



THE ARCHITECTURAL
HERITAGE SOCIETY
OF SCOTLAND

*For the study and
protection of Scottish
architecture*

Development Management
City of Edinburgh Council
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30 September 2015

Dear Ms Parkes and Mr Mcmeeken,

E/36/12 | New Parliament House, 5 - 7 Regent Road | 15/03989/FUL & 15/03990/LBC

Thank you for the opportunity to comment on the above applications.

The school is one of the most important examples of Greek Revival architecture in the world, and the Historic Scotland list description states that its massing and masterful use of classical architectural language cemented Edinburgh's reputation as the Athens of the North. The building stakes Scotland's claim to be the seat of Enlightenment both implicitly by its learned and elegant architecture, and explicitly by the motto over the door 'mysis res publica floreat', which translates roughly as 'may the country flourish through education'.

The applicant proposes to alter Thomas Hamilton's building, and to flank it with two tall hotel bedroom blocks, demolishing a number of features of note including a later gate lodge and a considerable extent of boundary walls and railings.

The Architectural Heritage Society of Scotland (AHSS) supports high quality modern architectural interventions. In our view, however, although the architecture is undoubtedly of high quality, the applicant has failed to respond to the existing building, the site or its historical context. The scale of the proposals dwarfs the school, and has a negative impact on nearby St Andrew's House (category A), the Nelson Monument (category A), the National Monument (category A) and Regent Terrace (category A). This is in contravention of local plan policy ENV 3. The proposals ignore the relationship between the buildings of Calton Hill and views to the Salisbury Crags and Arthur's Seat, and disrupt the composition of the buildings grouped on Calton Hill.

The Forth and Borders cases panel has studied the documents appended to the application carefully. The panel strongly disagrees with the conclusions of the heritage impact assessment (part 3 of the 'Heritage Statement'). For instance, we cannot accept that blocking the view towards the Old Town and Edinburgh Castle from the public footpath to the top of Calton Hill is only 'moderate adverse' (view 032 b), especially as it

will become an increasingly important public route to new cultural activities at the former City Observatory. In another example, an intervention is described only as 'negligible adverse', although the distant view framed by St Andrew's House would be completely blocked, and the public footpath heavily overshadowed (view 032 c). View 021 b is described as 'minor adverse', although the massing of the building bisects the Nelson Monument, and obliterates any sense of Calton Hill as a landscape setting. Nor can blocking the key view of a category A-listed building with a six-storey hotel wing be described as 'minor beneficial' (view 027 b). Of the thirty-eight views assessed, there are no 'major adverse' impacts and only four 'moderate adverse' impacts. Therefore, the panel cannot regard this evaluation as a reliable assessment of the potential impact of the proposals on this remarkably sensitive location.

Further concerns include the proposal to install poorly designed and detailed railings around the portico, damaging the little-altered architectural purity of the key point of the composition; and the proposal to slap a clumsy service entrance through the east pavilion resulting in the loss of one of the pylon-framed doors. The panel also objects to the demolition of Robert Wilson's lodge of 1885, which is suitably scaled to the context in footprint, height and detail.

The floorplans also gave rise to concerns. The small size and northerly aspect of many of the bedrooms gave rise to concerns that the building will not be viable as a six-star hotel in the long term. The discrete nature of the two bedroom tower blocks suggest that the building could, at some time, be divided should its fortunes change, further undermining the integrity of the original building. Since planning legislation cannot protect the building from a progressive decline in its use, the panel would urge the council to assure itself that control over the quality of the tenant's business is written into the lease. That hotels in Edinburgh can have mixed fortunes is evidenced by the four-star Hilton adjacent to the Belford Bridge, which became a Travelodge, with its smart principal entrance at street level converted to a fire escape, its restaurant subdivided into bedrooms, and the well-kept landscaping of the Water of Leith pathway level abandoned. Another example is Andrew Doolan's ground-breaking Point Hotel, which became a particularly bland DoubleTree. The Scotsman Hotel has had well-publicised financial troubles. Missoni pulled out of their George IV Bridge hotel after little more than five years. These experiences suggest that the proposed use constitutes a potential danger to the building.

The proposals also erode the cultural meaning of the buildings on Calton Hill, which all represent aspects of national life and values: science, the arts, the army, the navy and education. The buildings of Calton Hill are a manifesto in stone, embodying ideas about national identity, and this manifesto would be disrupted by a new narrative of private commercial gain.

We wish to put it on record that the consultation process has not been exemplary. The developers invited the AHSS to tour the building in advance of their exhibition. However, although the plans have changed considerably since the exhibition, further community consultation did not take place, and the applicant refused an invitation to speak at an event held by the AHSS in March. Furthermore, we have received information that the electronic surveys carried out at the time of the exhibition at the school were designed in such a way that if the visitor did not express a preference for design options A, B or C (there was no option for 'none of the above'), the survey could not be submitted. Images of the proposals have, at times, been released the press, but community groups have been unable to contribute to public discussion because information was not made

available to them at the same time. In addition, it appears that advice from the City of Edinburgh Council's planning department, Edinburgh World Heritage and Historic Scotland has not been taken into account as the proposals have evolved. Poor maintenance of the building over the past five years has made acceptance of the proposals appear more urgent than, in fact, it is.

The cases panel's opinion is based on the following policies:

Policy Des 1: the design fails to draw upon the positive characteristics of the surrounding area, drawing inspiration, instead, from the Salisbury Crags and South American examples. The scale, in particular, is damaging to the character of the building's context.

Policy Des 3(a): the design will have a negative impact on the setting, blocking key views of the Royal High School, the Nelson Monument and the setting of the National Monument. It develops on and blocks views to a considerable portion of the Calton Hill landscape.

Policy Des 3(b): the applicant proposes to demolish the 1885 lodge, which makes a sensitive and appropriate contribution to the site. The proposals block a number of key views of the site and of neighbouring buildings, and views from within and behind the site out across the city. This would be detrimental to the sense of place.

Policy Des 3(e): the proposals do not distinguish between public and private spaces, as many of the supposedly public spaces are of an exclusive commercial nature. This is not appropriate for such a prominent public building.

Policy Des 10(a): the proposals would be harmful to the skyline and townscape in this part of the city, rising above the topography of the natural surroundings that define the character of Calton Hill from key viewpoints, and above Thomas Hamilton's Royal High.

Policy Des 10(b): the scale of the hotel towers is wholly inappropriate to the sensitive historic setting, and is detrimental to a number of listed buildings, a landscape that is protected by statute and the overall character of Calton Hill.

Policy Des 11(a): the design and form of the proposed buildings is not compatible with the character of the existing building. Whilst the architectural treatment is of a high quality, the scale and form mean that the proposed buildings would dominate Thomas Hamilton's Royal High and be to the detriment of its character as a building in a carefully considered landscape setting.

Policy Des 11(c): the proposals will be to the great detriment of neighbourhood amenity and character, changing the public and cultural emphasis to one of commerce, branding and exclusivity.

Policy Env 1: The development explicitly harms the qualities that justified inscription, through the inappropriate scale of development, the impact on Calton Hill and on the neighbouring listed buildings that form a key part of the character of the World Heritage Site.

Policy Env 2: The demolition of the gate lodge cannot be justified as it is not beyond repair, and no efforts have been made to safeguard or market it for other purposes. As the proposed development does not contribute to the character for the site, its loss is not outweighed by the construction of a better building.

Policy Env 3: as above, the proposals would be to the detriment not just of Thomas Hamilton's Royal High, but St Andrew's House, the Nelson Monument, the National Monument and Regent Terrace.

Policy Env 4: the proposals for the portico of the school and the service entrance on the east pavilion both cause unnecessary damage and diminish the interest of the building.

Policy Env 5: The demolition of the gate lodge would be detrimental to the character of the New Town Conservation Area, and its replacement would neither enhance nor preserve the character of the area.

Policy Env 6(a): The proposals neither preserve nor enhance the special character or appearance of the conservation area, and are not consistent with the character appraisal.

Policy Env 6(b): The proposals obliterate, to a considerable extent, the trees, hedges, boundary walls and railings that define the character and setting of the listed building and the character of the conservation area.

Policy Env 7: The proposals have a direct and considerable detrimental impact on The New Town Gardens, would block key views, and harm the understanding of the topography and designed features of Calton Hill.

In sum, the cases panel wishes to **object** to the proposals for Thomas Hamilton's Royal High School because the hotel is too big for the site, because it fails to respect the Neoclassical language of the school, because it harms the historical and topographical context of the building, because it has a negative impact on key views into and out of Calton Hill, and because it disrupts the narrative of nationhood and aspiration that is embodied in the site. The architecture of the Athens of the North, with Calton Hill at its core, is austere and learned, but millions respond to its beauty, and this brings £1.6 billion to the city each year. Edinburgh's core survived the slum clearances of the nineteenth century and the demolition craze of the 1960s that laid waste many of the great cities of Europe. The Architectural Heritage Society of Scotland hopes that, by refusing this application, the City of Edinburgh Council will continue to preserve what is best about this city for future generations to enjoy.

Yours sincerely,

Dr Elizabeth Graham
on behalf of
Forth & Borders Cases Panel