

Old and New Towns of Edinburgh World Heritage Site: communal bin review

Heritage Impact Assessment

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Simpson & Brown

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FRONT MATTER

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Abbreviations

- CACA – Conservation Area Character Appraisal
- CEC – City of Edinburgh Council
- CECAS – City of Edinburgh Council Archaeology Services
- EIA – Environmental impact assessment
- EWB – Edinburgh World Heritage
- HER – Historic environment record (see CECAS)
- HES – Historic Environment Scotland
- HEPS – *Historic Environment Policy for Scotland (2019)*
- HIA – Heritage Impact Assessment
- ICOMOS – International Council on Monuments and Sites
- LDP – Local Development Plan
- LPA – Local planning authority (see CEC)
- NLS – National Library of Scotland
- NTBCC – New Town and Broughton Community Council
- OS – Ordnance Survey
- OUV – Outstanding universal value
- S&B – Simpson & Brown
- SM – Scheduled monument
- SMR – Sites and Monuments Records
- SPP – *Scottish Planning Policy (2014)*
- TVIA – Townscape and visual impact assessment
- UNESCO – United Nations Educational, Scientific and Cultural Organisation
- WHS – World Heritage Site

1.0 EXECUTIVE SUMMARY

1.1 Purpose and background to this heritage impact assessment

This heritage impact assessment has been commissioned by the New Town and Broughton Community Council and New Town resident's associations to review the decision of CEC to replace the existing gull-proof-bag waste collection system in use in parts of the Old and New Towns of Edinburgh World Heritage Site (the WHS) with on-street bin hubs. The WHS is inscribed by the United Nations Educational, Scientific and Cultural Organisation (UNESCO) for its outstanding universal value and City of Edinburgh Council (CEC) provides statutory protection for the site under UK law by conservation area designation.

In 2011, the City of Edinburgh Council trialled a number of options for collecting waste in the streets across the World Heritage Site, in order to reduce the debris caused by gulls and urban foxes attacking black bin bags. Following these trials CEC officials recommended the introduction of large communal bins in the New Town. These were to be positioned after consultation with local residents' associations. However, palace-fronted streets and architectural set pieces were (and are) protected by a policy agreed by the Councils' Planning Committee in 2006. An overwhelming majority of residents voted against communal bins for waste collection or recycling during a consultation held in November 2011. Individual households on a number of streets in the New Town, Moray Feu, West End, Stockbridge and Inverleith were therefore provided with gull-proof bags instead of on-street communal bins. The current type of bag has been in use since 2014. The bags are supported by recycling box collections for recyclable materials for individual households.

In 2019-20 CEC reviewed the types of bins and services used throughout the city, and on 22 April 2021 the decision was made by the Transport and Environment Committee to replace the gull-proof-bag service with on-street bin hubs, in addition to replacing and expanding existing on-street bins in the World Heritage Site. CEC Waste and Cleansing Services submitted an EIA screening opinion request to CEC Planning and Building Standards in August 2021, and in September of the same year it was concluded that an EIA (which would have included a heritage impact assessment) was not required. In particular, the screening request opinion concluded that the bin hubs were not likely to result in a significant impact to landscapes and sites of historical, cultural, or archaeological significance.

This heritage impact assessment was commissioned to provide a second opinion on the impacts of bin hubs on heritage assets in Edinburgh. It follows the methodology set out in ICOMOS's *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* (2011). This sets out guidance for carrying out heritage impact assessments for World Heritage properties, in order to evaluate effectively the impact of a potential development on the property's outstanding universal value (OUV).

Since the commissioning of this heritage impact assessment an alternative approach to on-street bin hubs has been commenced. For six months from October 2022, CEC agreed with resident associations to trial the use of green gull-proof bags for around a thousand households in the New Town. These bags were to be used instead of recycling boxes and households were required to place their mixed recycling into clear plastic bags and use the green gull-proof bags in the same manner as the black gull-proof bags (i.e. putting them out for collection on a specific day). The trial was led by residents as an attempt to demonstrate to CEC that an alternative to communal bins could be found which minimised visual impact on the OUVs of the World Heritage

Site and the conservation areas, provided greater opportunity to recycle, keep the streets clean, and was cost-effective. The trial was accompanied with an informational and educational leaflet about how to recycle. This trial is under way at time of writing.

1.2 Heritage assets

Heritage assets which might undergo change as a result of the proposals scoped in to this impact assessment are: the New Town conservation area; Old Town conservation area; West End conservation area; and the Old and New Towns of Edinburgh World Heritage Site. Following the methodology for this type of impact assessment, these heritage assets are considered separately despite the fact that the World Heritage Site includes all of the conservation areas.

These heritage assets contain streets currently served by the gull-proof-bag system which would be changed to communal bin hub sites were CEC's plans to be enacted. The focus of this study has generally been on the gull-proof-bag streets as they would undergo the greatest level of change: they currently have no on-street waste infrastructure at all, and this would be changed with the construction of the proposed bin hubs. However, some examples of streets which already have some on-street bin provision (which would be increased under the proposals) have been included where they are judged to be particularly sensitive to change.

Listed buildings are not considered in this impact assessment as the precise location of the proposed bin hubs is unknown, meaning that it is not currently possible to assess the effects of the hubs on individual buildings. However, it is highly likely that there would be impacts on the setting of listed buildings, including many in Category A which would have high or very high sensitivity to change. The likely effects on these heritage assets in particular might therefore be significant and adverse in EIA terms (see section 1.4 for explanation of terminology).

It was determined that no specific scheduled monument or garden and designed landscape would be sufficiently affected by the proposals to be considered.

1.3 Summary history of the site and context

The study area comprises the Old and New Towns of Edinburgh World Heritage Site, with a particular focus on those containing streets currently served by the gull-proof-bag system, in particular the New Town, Old Town, and West End conservation areas.

The Edinburgh area has been settled since at least the Bronze Age, and there has been a royal castle on Castle Rock since the tenth century. The primary settlement of Edinburgh grew up around the castle and along the ridge between it and Holyrood Abbey, using the narrow medieval burgh plots extending from each side of the main street which are characteristic of historic Scots town planning. Throughout the later middle ages and the early modern period, difficulties were caused in the Old Town by the simultaneous needs to accommodate a growing population and to contain and protect the city from attack, which led to the erection of the Flodden and Telfer walls. The result of these combined objectives, as well as the steep topography of the site, led to the development of an extremely dense settlement with narrow streets and unusually tall buildings.

By the eighteenth century, middle- and upper-class residents of the Old Town felt that the overcrowding and unsanitary conditions were becoming untenable. The erection of the North Bridge in 1763-72, which connected the Old Town to the plain to the north, made a northern extension of the city more manageable, and construction began on the first New Town at the tail end of the eighteenth century to designs by James Craig. The success of the development became clear not long after it began and repeated extensions to the New Town were planned and executed throughout the nineteenth century, including the Second New Town to the north, the Third New Town to the east, and the Moray Estate and West End to the west. Many of Scotland's most important architects worked in the New Town, including Robert Adam, W. H. Playfair, James Gillespie Graham, and William Burn. Broadly speaking the architectural style of the new town as development was Neo-classical and Picturesque, relying on formal aesthetic qualities such as order, symmetry, regularity, balance, axiality, aesthetic simplicity, simple volumes and clean lines, and – of course – details and forms derived from Greek and Roman Antiquity.

The success of the New Town led to many of wealthy citizens leaving the Old Town, which subsequently suffered a decline in conditions. It began to be revived later in the nineteenth century with increased development, particularly in the Baronial style, which attempted to modernise accommodation and improve living standards while still evoking Edinburgh's medieval past.

While there was some large-scale development in post-war Edinburgh, in particular the erection of the St James Centre—now recently replaced—the interest in the preservation of the historical character of the Old and New Towns in particular meant that the city remained relatively unaltered. The Old and New Town conservation areas were designated in 1977, the West End conservation area in 1980, and the World Heritage Site inscribed by UNESCO in 1995.

1.4 Heritage impacts of the proposals and proposed mitigation

Heritage Impact Assessment methodology classifies the effects of a development on heritage assets as either adverse or beneficial, and then into categories based on its magnitude: in this case major, moderate, minor, negligible, and no effect. It is then considered whether proposed mitigation will change the category of the effect and a final, residual effect category is indicated. Where there is no residual effect, or where the effect is negligible or minor, this is classed as not being significant in EIA terms. This means that there is no reason to object to the proposed development on heritage grounds. Where the residual adverse effect is moderate or major, this is termed a significant effect. Where an adverse effect has been found which is significant in EIA terms, there is a presumption that on heritage grounds, the development should not proceed as proposed.

1.4.1 *New Town conservation area*

Under the terms of EIA (heritage impact assessment), the installation of bin hubs would have a significant impact on the special character and appearance of the New Town conservation area, specifically a moderate adverse effect. This is because although the bin hubs themselves would only represent a small change to the heritage asset, the conservation area has a high sensitivity to change. The mitigations proposed by the council are judged not to be sufficient to negate a residual moderate adverse

effect. Especially significant areas of the conservation area on which there would be an effect include CEC's Edinburgh Key Views C15 and C17 towards St Mary's Cathedral, and on the cathedral itself, which is identified as a focal point of views in the New Town Conservation Area Character Appraisal (CACA); Key View C12 (viewpoint A1) along Frederick Street; Key View C11a along Queen Street; Key View C11c along Albany Street; and Key Views C07a, b, and c from Regent and Royal Terraces. There would also be a negative effect on views towards Calton Hill, which is a focal point of views in the CACA. There would also be a certain visual and possible physical effect on historic street surfaces, which are recognised as a key element of the conservation area in the CACA.

1.4.2 Old Town conservation area

The installation of bin hubs would have a significant impact on the special character and appearance of the Old Town conservation area, specifically a moderate adverse effect. This is because although the bin hubs themselves would only represent a small change to the heritage asset, the sensitivity of the conservation area is high. The mitigations proposed by the council are judged not to be sufficient to negate a residual moderate adverse effect. Especially significant areas of the conservation area on which there would be an effect include Edinburgh Key View C06 from Jeffrey Street towards Calton Hill.

1.4.3 West End conservation area

The installation of bin hubs would have a minor adverse effect on the special character and appearance of the West End conservation area. This is not classed as significant in EIA terms. This is because although the bin hubs themselves would represent a small change to the heritage asset, the sensitivity of the conservation area is only medium. The mitigations proposed by the council are judged not to be sufficient to negate a residual minor adverse effect. However, in any case, this effect is not considered significant in EIA terms.

1.4.4 Old and New Towns of Edinburgh: World Heritage Site

The installation of bin hubs would have a significant impact on the outstanding universal value of the Old and New Towns of Edinburgh World Heritage Site, specifically a moderate adverse effect. This is because although the bin hubs themselves would only represent a small change to the heritage asset, the sensitivity of the World Heritage Site is very high. The mitigations proposed by the council are judged not to be sufficient to negate a residual moderate adverse effect. The fact that the effect is significant means that there is a risk to the OUV of the WHS from the installation of bin hubs. In particular, there would be a threat to the integrity of the WHS, which is described in the Statement of Outstanding Universal Value as 'a remarkably consistent and coherent entity.' The coherent appearance of the New Town, in particular, would be negatively affected by the introduction of bin hubs.

1.4.5 Conclusion

Overall, the introduction of bin hubs would have a significant effect on the New Town and Old Town conservation areas, and on the Old and New Towns of Edinburgh World Heritage Site. Although the bin hubs amount to only a small change to the heritage assets, the sensitivity of the New Town and Old Town conservation areas and the World Heritage Site is such that their installation would have a significant impact, on their setting, in the form of a moderate adverse effect. This is particularly in recognition of the fact that it is part of a pattern of cumulative negative effects which have gradually eroded the significance of the heritage asset (for example increases to signage and use of inappropriate paving materials). There would also be a negative effect on CEC's Edinburgh Key Views recognised in both conservation areas, such as the view along Melville Street towards St Mary's Episcopal Cathedral, the view west along Regent Terrace towards the Tron Spire, and the view north from Jeffrey Street towards Calton Hill. The West End conservation area is judged to have a slightly lower sensitivity, meaning that there would be a minor adverse effect there, which is not considered significant in EIA terms.

The mitigation currently proposed by CEC is not judged to be effective, relying too heavily on the transitory and already negative effect of parked cars to screen the hubs and not reflecting the fact that the design of the streets is such that there is no appropriate place for a permanent installation. A number of CEC's proposed mitigation strategies focused only on superficial aspects of the hubs such as bin lid colour. Overall based on the current bin hub design and the as-built realities of the hubs outside the World Heritage Site, in our assessment we do not consider that the proposed mitigations would effectively address the massing of the hubs, which is the primary concern. Therefore an adverse effect on the cultural-heritage significance of the assets would still remain even if all of the proposed mitigations were applied.

The fact that effects on the New Town and Old Town conservation areas and on the Old and New Towns of Edinburgh World Heritage Site were found to be significant in EIA terms means that there would be a risk both to the character and appearance of the conservation areas, and to the OUV of the WHS, were communal bin hubs to be installed. It also means that this report contradicts the decision taken by CEC that an EIA was not required in order to install communal bin hubs, as according to ICOMOS guidance, wherever a significant effect is anticipated, an impact assessment should be carried out.

Overall, this report comes to the conclusion that since negative effects on heritage assets which are significant in EIA terms are anticipated, there should be a presumption against the installation of communal bin hubs within the Old Town Conservation Area, New Town Conservation Area, and Old and New Towns of Edinburgh World Heritage Site.

2.0 INTRODUCTION

2.1 Objectives of this heritage impact assessment

The purpose of this heritage impact assessment is to assess the proposed scheme against the significance of the heritage assets and designations, and the related legislative, planning policy and guidance context.

Historic Environment Policy for Scotland (2019) ('HEPS') sets out how HES expects others to interpret and implement the *Scottish Planning Policy (2014)* with regard to the historic environment, enabling good decision-making by a set of principles and policies. These state the requirements for applications concerning development which are anticipated to affect the historic environment, and this heritage impact assessment is formulated to respond primarily to these principles and policies. It is intended:

- Regarding HEP1, to set out 'an inclusive understanding of the breadth and cultural significance' of the heritage assets that would be affected;
- Regarding HEP2, to demonstrate the ways that the 'understanding, enjoyment as well as [the] benefits' of the historic environment would be secured; and
- Regarding HEP3, explain how unavoidable detrimental impacts from the Proposed scheme would be minimised and mitigated.

Similarly, the *Edinburgh Design Guidance (2020)* advises that applications affecting the historic environment should be accompanied by appropriate supporting documents relating to the assessment of the heritage such as an assessment of the setting of listed buildings and potential impacts from proposals.

2.2 Study Area

The study area comprises the Old and New Towns of Edinburgh World Heritage Site (**Figure 1**) as well as the New Town, Old Town, and West End conservation areas.



Figure 1 Heritage assets: the interaction between the WHS and City of Edinburgh Council's conservation areas. The outline of the WHS is marked in red. The individual conservation areas are shaded. ©UNESCO

2.3 Method of assessing effects on cultural-heritage assets

Baseline values of the heritage assets were assessed using a photographic survey. A camera with an APS-C sensor format was used with a 35 mm focal length and the aperture set at f/10, creating normal perspectival conditions (equivalent to 50 mm focal length in 35 mm full-format), taking into account TVIA guidelines.

The methodology adopted in section 7.0 of this heritage impact assessment is that set out in ICOMOS's *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* (2011). This sets out guidance for carrying out heritage impact assessments for World Heritage properties, in order to evaluate effectively the impact of a potential development on the property's outstanding universal value (OUV). Nonetheless, it is a valid assessment methodology to adopt for all heritage assets potentially affected by the Proposed scheme, as it allows sensitivity of receptors and impacts of changes to be evaluated in the same systematic and coherent manner.

The ICOMOS *Guidance* (2011) sets out two scales: for assessing the value of attributes of WHSs and therefore their sensitivity to change; and for assessing the magnitude of impact of a particular change. These have been adapted and combined with the EIA Regulations (as defined by Scottish Ministers) in this heritage impact assessment.

Furthermore, the ICOMOS *Guidance* states that the value of assets and their sensitivity to change is derived from: their relative heritage value; and the relative weight which statute and policy attach to it. **Table 1** below summarises the relative sensitivity of the heritage asset types relevant to the proposed scheme. This is derived from the ICOMOS *Guidance*, and it should be noted that it deviates from the magnitude of change definitions set out in EIA regulations, with the inclusion of the additional 'Very high' criterion. The criteria described in the table are reproduced largely verbatim from ICOMOS, and have been adapted only to reflect the specific built heritage policy landscape of Scotland. For example, ICOMOS describes in the 'Very High' category of buildings 'Individual attributes that convey OUV of the WH property'; as 'High' 'Nationally-designated structures with standing remains'; and as 'Medium' simply 'designated buildings'. This has been adapted as 'Category A listed buildings that convey the OUV of a world heritage site', then other Category A listed buildings, followed by Category B and C listed buildings. Text referring to Conservation Areas and the WHS have been taken directly from ICOMOS.

Table 1 Sensitivity of historic environment assets to change from ICOMOS (2011) Appendix 3a, adapted to reflect the Scottish built heritage policy landscape.

Sensitivity change	to Definition/criteria derived from ICOMOS (2011)
<i>Very high</i>	Assets of acknowledged international importance, including: <ul style="list-style-type: none"> - Inscribed World Heritage Sites (including candidate sites); - Scheduled monuments that convey the OUV of a World Heritage Site; - Category A Listed Buildings that convey the OUV of a World Heritage Site.
<i>High</i>	Assets of national importance, including: <ul style="list-style-type: none"> - Category A Listed Buildings; - Conservation areas containing very important buildings.
<i>Medium</i>	Assets of regional importance, including: <ul style="list-style-type: none"> - Category B and C Listed Buildings; - Conservation areas containing buildings that make an important contribution to historic character.
<i>Low</i>	Assets of local importance, including: <ul style="list-style-type: none"> - Archaeological sites of local importance; - Unlisted buildings and townscapes with local characteristics.
<i>Negligible</i>	Other assets of little or no importance, including: <ul style="list-style-type: none"> - Sites of former archaeological features (now destroyed); - Unlisted buildings of no architectural merit, or of an intrusive character.

In order to assess the magnitude of impacts resulting from construction and operation of the proposed scheme on each heritage asset, the criteria set out in **Table 2** below will be used.

Table 2 Magnitude of effects, from ICOMOS (2011) Appendix 3b, adapted to reflect the Scottish built heritage policy landscape.

Level of magnitude	Definition derived from ICOMOS (2011)
<i>Large change</i>	Comprehensive change to the surroundings of an asset, such that its baseline setting is substantially or totally altered and key visual links and relationships with the surroundings are lost or substantially altered.
<i>Medium change</i>	Considerable changes to the surroundings of an asset, such that the character of the asset and its baseline setting is materially altered and key visual links and relationships with the surroundings are materially affected.
<i>Small change</i>	A noticeable change in the surroundings of an asset, resulting in superficial alteration of its baseline or setting while key visual links and relationships with the surroundings are unaffected.
<i>Negligible change</i>	A very slight or minimal change in the surroundings of an asset, resulting in a barely noticeable alteration of its baseline setting while key visual links and relationships with the surroundings are unaffected.
<i>No change</i>	No change to an asset.

The sensitivity/heritage value of assets, and the magnitude of impact in the above tables will be combined to assess the overall significance of effect upon each heritage asset, using the matrix presented below in **Table 3**. These effects may be adverse or beneficial.

Table 3 Matrix showing significance of effects on heritage assets

		Sensitivity to change				
		<i>Very high</i>	<i>High</i>	<i>Medium</i>	<i>Low</i>	<i>Negligible</i>
Magnitude of change	<i>Large</i>	Major	Major to Moderate	Moderate to Major	Minor to Moderate	Negligible
	<i>Medium</i>	Major to Moderate	Moderate to Major	Moderate	Minor	Negligible
	<i>Small</i>	Moderate to Minor	Minor to Moderate	Minor	Negligible to Minor	Negligible
	<i>Negligible</i>	Minor to Negligible	Minor to Negligible	Negligible	Negligible	Negligible

Where this matrix provides a split in the level of effects – e.g. moderate/minor – the assessor will exercise professional judgement in determining which is more appropriate.

Greater levels of effects may occur during installation, however these would be of a temporary duration. Therefore, the assessment will only assess effects during the operational phase.

Moderate effects and above are considered to be ‘significant effects’ within the meaning of the EIA Regulations. Minor effects and below are considered to be ‘not significant’.

3.0 RELEVANT HERITAGE ASSETS

3.1 Heritage assets considered in this statement

The heritage assets considered in this statement are:

- Conservation areas (New Town, Old Town, West End)
- The Old and New Towns of Edinburgh World Heritage Site (WHS);

These heritage assets are shown on **Figure 1**.

Listed buildings are not discussed in this impact assessment as individual entities, as the precise location of the proposed bin hubs is unknown and the potential impacts therefore impossible to judge.

3.2 Conservation areas

The site of the proposed scheme affects the New Town conservation area, and to a lesser extent the Old Town and West End conservation areas.

In section 61 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 a conservation area is defined as an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.

The *Scottish planning policy 2014* (SPP) states that development proposals should preserve or enhance the character and appearance of a conservation area and its setting, and that proposals that 'do not harm the character or appearance of a conservation area should be treated as preserving its character or appearance'.

HES notes that the local planning authority is required to pay special attention to the desirability of preserving or enhancing the character and appearance of the area when exercising their powers under the planning legislation. Thus, the 'General principles' from CEC's *Listed Buildings and Conservation Area Guidance* (2020, p. 24) regarding conservation areas, sets out guidelines and recommendations regarding development within a conservation area:

Designation of a conservation area does not mean development is prohibited.

However, when considering development within a conservation area, special attention must be paid to its character and appearance. Proposals which fail to preserve or enhance the character or appearance of the area will normally be refused. Guidance on what contributes to character is given in the conservation area character appraisals.

The aim should be to preserve the spatial and structural patterns of the historic fabric and the architectural features that make it significant.

Preservation and re-use should always be considered as the first option.

Interventions need to be compatible with the historic context, not overwhelming or imposing.

Without exception, the highest standards of materials and workmanship will be required for all works in conservation areas.

3.3 World Heritage Site

The proposals would impact the Old and New Towns of Edinburgh World Heritage Site, inscribed in 1995 by UNESCO. Areas are inscribed on the World Heritage List under certain criteria to protect heritage that is of such outstanding universal value that its conservation is important for current and future generations.

The WHS management plan (2018, p. 18) states that one of its purposes is to ensure

that development takes appropriate account of the unique qualities of the Site (i.e., the OUV). Care and attention is required to ensure that any change preserves and enhances the OUV.

The SPP establishes that the responsibility for enforcing this lies with CEC. It states that 'Where a development proposal has the potential to affect a World Heritage Site... the planning authority must protect and preserve its Outstanding Universal Value'.

4.0 HISTORICAL SUMMARIES

4.1 New Town conservation area

4.1.1 History

The New Town conservation area comprises approximately 322ha of land representing the north part of the city centre. It is bounded by Princes Street Gardens and Waverley Station to the south, Royal Crescent to the east, Magdala Crescent and the Dean conservation area to the west, and by the Inverleith and Stockbridge Colonies conservation areas to the north.

The New Town of Edinburgh represents a northern extension of the city initiated in the 1760s as a way for the middle- and upper classes to escape the cramped and unsanitary conditions of the medieval city centre around the castle. Its construction was enabled by the erection of the North Bridge between 1763 and 1772, which connected the Old Town to the land to the north. The first New Town was laid out to designs by James Craig. It was laid out in an orthogonal grid-plan with the long axes oriented perpendicular to the gradient; by this means the city's topography was used to engineer a series of level views east and west, and dramatic views north and south looking up and down steep gradients. Its streets typically comprise homogenous, flat façades, the regular appearance of which frame distant focal point buildings such as St George's Church (now West Register House) in Charlotte Square. Initially the appearance of the individual buildings was not constrained, being at the discretion of the purchaser of each plot, but laws and guidelines written up in the 1780s and 90s regulated their design. The street names, such as Queen Street, Prince's (later Princes) Street and Hanover Street, were designed to honour the house of Hanover and the United Kingdom, in the light of the 1707 Act of Union. Construction began from the east corner closest to North Bridge, and was encouraged by Robert Adam's Register House (begun in 1774), although it was not fully completed until well into the nineteenth century.

The success of Craig's New Town led relatively swiftly, and long before it was completed, to further schemes being planned for extensions to it. The layout of the northern or second new town was initially designed in the early 1800s by William Sibbald and extended the city northwards as far as the Water of Leith, largely using the same basic layout as Craig, while William Playfair masterminded the eastern or third new town. Only part of the latter was built, around Calton Hill, including the two magnificent streets Regent Terrace and Royal Terrace, designed to be seen from a distance and to capitalise on exceptional views looking away from the hill. Continuing development on Playfair's plan to the north of London Road towards Leith was never completed as designed. Other areas were also developed, such as the western new town structured around Melville Street and Shandwick Place, and the Moray Estate overlooking the Water of Leith.

Dramatic proposals for alterations in the conservation area, particularly in Princes Street and its immediate environs, were made after the Second World War by town planner Sir Patrick Abercrombie, and resulted in the demolition of Picardy Place and St James Square, the latter of which when rebuilt became the St James Centre. However, increasing interest in the preservation of the New Town throughout the 1960s and 70s resulted in relatively few of the proposed major changes being carried out.

The New Town conservation area was first inscribed in 1977, and alterations were made in 1980 and 1995.

4.1.2 Attributes contributing to the special architectural or historic interest within the context of the proposed scheme

The CACA for the New Town conservation area notes that the significance of the conservation area lies in its 'outstanding concentration of planned ensembles of ashlar-faced, world-class, neo-classical buildings'.¹ Much of the special architectural and historic interest of the New Town therefore lies not in individual buildings (although there are a great many listed buildings within it) but in the effect of its streets taken as a whole. This is particularly expressed by what the CACA describes as its 'visual homogeneity', initiated in the late eighteenth century by mandating buildings of a consistent size, material, and to some extent design, and still protected by CEC by design guidance such as requiring that windows be painted white, and ironwork black.² This serves the 'neoclassical order, regularity, symmetry, rigid geometry and hierarchical arrangement of buildings and spaces' which is absolutely key to the conservation area's special architectural interest.³ It also plays a role in creating the terminated vistas which were a key design feature of the various new towns: for example, the view south-west down Melville Street, dramatically terminated by St Mary's Episcopal Cathedral.

Parks and green spaces were also part of the plans for the New Town from its earliest iteration, as what would become Queen Street Gardens was drawn into James Craig's initial plans. The relationship between the buildings and gardens, whether they are public parks or private shared gardens, is a key part of the New Town's design and represents a picturesque approach to town planning.⁴ Streets such as Heriot Row became particularly desirable locations during the planning of the second New Town specifically because of their green outlook, looking directly on to Queen Street Gardens.

In addition, the CACA specifically references 'the relationship [between] stone buildings, pavements and setted streets' as a key feature of the conservation area which provides 'a disciplined unity and cohesion' to the New Town.⁵ Many streets in the New Town retain their historic pavement and/or road surfaces, typically Craighleith sandstone pavements and granite setted streets. This is in addition to the survival in many places of early street furniture, such as carriage and horse mounting blocks, gullies, street lights, police boxes, and telephone boxes, which also contribute to the special interest of the area. The CACA states that

The extensive retention of historic street surfaces... add [sic] an important texture to the character of the area. [The surfaces] should be rigorously protected and used as guiding references in new works.⁶

¹ CEC, *New Town conservation area character appraisal*, 5.

² *Ibid.*, 22; 45-46.

³ *Ibid.*, 20.

⁴ *Ibid.*, 36.

⁵ *Ibid.*, 41.

⁶ *Ibid.*

4.2 Old Town conservation area

4.2.1 History

The Old Town conservation area is bounded by the parallel valleys of Princes Street Gardens to the north and the Cowgate to the south, by the Castle to the west and Calton Hill and Holyrood Palace to the east.

The Old Town conservation area represents the ancient historical centre of the city of Edinburgh, and parts of the area have been settled since at least the Bronze Age. The natural outcrop of Castle Rock has long been recognised as a strategic site, and there has been a royal castle on the rock from the tenth century. As settlement grew up around the castle, both to service it and be protected by it, the topography of the site necessitated a long narrow strip of development along the ridge towards the site to the which was the home of Holyrood Abbey since its foundation in 1128. The urban development of the town was in the typical Scots medieval form of narrow burgage plots extending away from the main road on each side in a 'fishbone' pattern. Throughout the middle ages and early modern period, the Old Town of Edinburgh was characterised by increasing urban density, the outward spread of the city being constrained both by the location of the site and surrounding landscape features, such as the Nor Loch, and from the sixteenth and seventeenth centuries by the erection of the Flodden and Telfer walls respectively. This increase in density led to narrow streets and especially to unusually tall buildings.

By the eighteenth century overcrowding in the Old Town had become a serious concern and precipitated the construction of the New Town to the north. The migration of middle- and upper-class accommodation to the New Town, as well as numerous civic functions, resulted in the social and economic decline of the Old Town, which by the middle of the nineteenth century had descended into slum conditions in some parts. It was subject to multiple improvement schemes during the nineteenth century, which aimed to introduce more open space and a greater number of new buildings which would be subject to tighter council regulation.

Ramsay Garden was developed in the late nineteenth century by Sir Patrick Geddes, a biologist and sociologist who also worked extensively in town planning. Geddes hoped to improve conditions in the Old Town both by creating better accommodation for the working classes, and by encouraging greater numbers of wealthier residents back to the area, in part by creating student accommodation buildings. Ramsay Garden developed around Ramsay Lodge, the eighteenth-century home of poet Allan Ramsay, and an existing row of houses, and was reconstructed into a new housing development which played on the Old Town's characteristic height and density and incorporated medievalising design elements.

The Old Town conservation area was first designated in 1977, although amendments were made in 1982, 1986, and 1996.

4.2.2 *Attributes contributing to the special architectural or historic interest within the context of the proposed scheme*

One of the key elements of the Old Town conservation area, according to the CACA, is its dense urban development which gives a 'sense of enclosure, separation, and

defence.⁷ This was necessitated by the restricted space of the city while its population was growing, but was also imitated in some later nineteenth-century developments which aimed to provide more quality housing in the area in the popular baronial style, and in a manner characteristic of the adjacent medieval city buildings. While the north façade of Ramsay Garden plays a key role in the dramatic skyline leading to the castle, the interior south and west façades create a close. Its small plan in combination with towering walls creates an intimate, domestic space which has a profusion of medieval detail, some historic and some fantastical. The result is a theatrical space which makes a strong contribution to the architectural interest of the conservation area, and which is also representative of historical efforts to regenerate the Old Town, and of the development of the baronial style, here combined with vernacular arts-and-crafts elements to create something which is particular to late-nineteenth-century Scotland.

4.3 West End conservation area

4.3.1 History

The shape of the West End conservation area is complex but it is roughly bounded by the New Town conservation area to the north and the Old Town conservation area to the east. Its southern boundary runs primarily along Morrison Street, with outshots to accommodate Bread Street Lane, Gardner's Crescent, and parts of Grove Street (the Rosebank Colonies are excluded as they make up their own conservation area), and the western tip of the area is at Haymarket.

Much of the history of the West End of Edinburgh stems from its location and role as a transport hub and the primary route out of the city towards Glasgow and South Queensferry. Routes crossed this area from the medieval period onwards, although the surrounding land appears to have been predominantly open until work began on the New Town in the middle of the eighteenth century and the subsequent laying-out of Lothian Road in the 1780s. It was subsequently crisscrossed by both the canal, from the 1820s, and the railways both to Waverley Station and to the Princes Street Station, now the Caledonian Hotel.

The 1820s saw considerable development in the conservation area, including the laying-out of some of its most significant streets such as Gardner's Crescent and Torphichen Street. In the latter half of the nineteenth century this was supplemented by development along the east side of Lothian Road, although much of the west side was taken up by transport infrastructure and concomitant industrial buildings. The presence of the Royal Lyceum Theatre and the Usher Hall, in addition to further nineteenth-century entertainment buildings no longer extant, meant that the West End also became a cultural centre in the city.

The twentieth century saw the closure of both the Port Hopetoun canal basin (in the 1920s) and the Princes Street Station (1960s), and redevelopment of these areas carried on through the century, culminating with the creation of the new financial district in the northwest part of Lothian Road in the 1980s and 1990s.

The conservation area was first designated in 1980 and was amended in 1995.

⁷ CEC, *Old Town conservation area character appraisal*, 44.

4.3.2 *Attributes contributing to the special architectural or historic interest within the context of the proposed scheme*

The West End conservation area contains buildings from a range of different architectural styles and periods, from early nineteenth-century tenement buildings to modern office blocks, and this eclecticism contributes to the architectural and historic interest of the area.⁸ In Torphichen street, Georgian tenement buildings survive along much of the north and some of the south side of the street, reflecting the aspirations for the West End to become a further New Town, while the later modern office buildings demonstrate the relative volatility of this conservation area in comparison to the Old and New Towns, due to its role in transport and that industry's receptiveness to changing technologies and their spatial requirements. The tenement buildings are typical of New Town residential blocks of the period, in fine ashlar masonry of three storeys, plus attic and sunken basement.

4.4 World Heritage Site

The proposals would impact the Old and New Towns of Edinburgh World Heritage Site, inscribed in 1995 by UNESCO. It was added to the World Heritage List under UNESCO criteria (ii) and (iv):

Criterion (ii) - Have exerted great influence, over a span of time or within a cultural area of the world, on developments in architecture, monumental arts, or town planning and landscape design.

The successive planned extensions of the New Town, and the high quality of its architecture, set standards for Scotland and beyond, and exerted a major influence on the development of urban architecture and town planning throughout Europe, in the 18th and 19th centuries.

Criterion (iv) - Be an outstanding example of a type of building or architectural ensemble or landscape which illustrates (a) significant stage(s) in human history.

The Old and New Towns together form a dramatic reflection of significant changes in European urban planning, from the inward looking, defensive walled medieval city of royal palaces, abbeys and organically developed burgh plots in the Old Town, through the expansive formal Enlightenment planning of the 18th and 19th centuries in the New Town, to the 19th century rediscovery and revival of the Old Town with its adaptation of a distinctive Baronial style of architecture in an urban setting. (UNESCO, WHS728)

The Edinburgh World Heritage Site covers an area of approximately 4.5km² (ewh.org.uk) and extends from its easternmost boundary at Holyrood Palace and Abbemount to the grounds of the Scottish National Gallery of Modern Art in the West. Its northern boundaries include Royal Crescent and St Stephen's Street and its southernmost point makes up part of the northern edge of the Meadows. Lothian Road lies along its irregular southeastern boundary.

⁸ CEC, *West End conservation area character appraisal*, (2006), 12.

4.4.1 History

The World Heritage site encompasses both the Old and New Town conservation areas, as well as parts of the West End conservation area.⁹ The histories of these have been summarised above.

4.4.2 Attributes contributing to OUV

The key focus of the inscription of Edinburgh Old and New Towns as a WHS is the area's contribution to the history of urban planning, and its unique ability to demonstrate the evolution of planning in Europe through the exceptional state of preservation of the medieval Old Town and Neoclassical New Town, and the inherent contrast between the two.

UNESCO Criterion (iii) states that 'The successive planned extensions of the New Town' are included, and that 'the high quality of [their] architecture set standards for Scotland and beyond.'¹⁰

Regarding the Old Town, a particular feature highlighted by UNESCO's assessment of the site's OUV is 'the renewal and revival of the Old Town in the late 19th century, and the adaptation of the distinctive baronial style of building for use in an urban environment' which 'influenced the development of conservation policies for urban environments.'¹¹

Regarding the integrity of the WHS, UNESCO writes that it is 'a remarkably consistent and coherent entity' and they also note that 'the level of authenticity in Edinburgh is high. Individually the high-quality buildings of all dates have been conserved to a high standard and the layout of streets and squares maintain their intact-ness.'¹²

⁹ The World Heritage Site also includes parts of the Dean Village, Coltbridge and Wester Coates, Marchmont and Meadows, and South Side conservation areas, but as these do not include any streets currently served by gull-proof bags, they are not included in this study.

¹⁰ UNESCO WHS728.

¹¹ Ibid.

¹² Ibid.

4.5 Summary of cultural-heritage significance and sensitivity

Table 4 below provides a summary of the cultural heritage resource in each receptor considered in the assessment and an explanation of how its sensitivity to change has been assessed. Please refer to **Table 1** which provides definitions for the sensitivity of heritage assets to change.

Note: World Heritage Sites can only be placed in the top category ('Very high' sensitivity to change); and conservation areas can only be placed in the second or third categories ('High' or 'Medium' sensitivity).

Table 4 Summary table of statutory weight of heritage assets, relevant heritage values and sensitivity to impacts from the Proposed scheme.

Heritage asset receptor and statutory weight	Heritage values	Sensitivity (see Table 1)
New Town conservation area	The majority of the conservation area lies within the WHS. The conservation area is known for its high concentration of well-preserved eighteenth- and nineteenth-century planned streets and predominant survival of contemporary buildings. The quality of the architecture is especially high, and there are many important views. The value of the conservation area lies both in the aesthetic importance of the streets and buildings, and the contribution it makes to the history of town planning.	High
Old Town conservation area	The majority of the conservation area lies within the WHS. It represents a medieval city centre in a good state of preservation, both its architecture and street plan, as well as its history of expansion and conservation. It includes a number of highly important buildings from all periods and views.	High
West End conservation area	Some of the conservation area lies within the WHS. It has an eclectic mix of architecture which demonstrates the changing history of this area over time from transport link to financial centre. There are some highly important buildings.	Medium
Old and New Towns of Edinburgh World Heritage Site: potential effects to OUV, due to setting impacts.	This is a site inscribed on the list of World Heritage Sites, possessing outstanding universal value. The part of the WHS most relevant to the proposed scheme includes attributes of historical association with the history of the city as a whole, important views, landmark buildings, fine-quality architecture by known architects, all with a high degree of integrity and authenticity.	Very high

5.0 HISTORIC ENVIRONMENT POLICY AND GUIDANCE

5.1 International guidance: ICOMOS

The *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* (2011) sets out guidance for carrying out heritage impact assessments for World Heritage properties, in order to evaluate effectively the impact of potential development on the property's OUV. It sets out a methodology to allow HIAs to respond to the needs of WHSs, through considering them as discrete entities and evaluating impact on the attributes of OUV in a systematic and coherent way.

A simple three-step process for HIA is set out at paragraph 2-2-1:

- *What is the heritage at risk and why is it important – how does it contribute to OUV?*
- *How will change or a development proposal impact on OUV?*
- *How can these effects be avoided, reduced, rehabilitated or compensated?*

The detailed considerations for each step are set out in the other sections of the document. Many of these are very similar to heritage impact assessment methodologies noted elsewhere in this document.

As noted in section 2.3, of particular relevance, the guidance sets out two scales: for assessing the value of attributes of WHSs and therefore their sensitivity to change; and for assessing the magnitude of impact of a particular change. These have been adapted and combined with the EIA Regulations, for use in this heritage impact assessment and the EIA for ease of use.

5.2 National and local policy and guidance

5.2.1 *Planning (Listed Buildings and Conservation Areas) Scotland) Act 1997*

Some changes in conservation areas are subject to statutory controls under the Planning (Listed Buildings and Conservation Areas) Scotland) Act 1997. This requires that owners must obtain approval from the Local Planning Authority before commencing any works that may impact on the area's 'special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance'. LPAs are required to act to preserve or enhance conservation areas, and controls include requiring applications for demolition of buildings and tree works.

5.2.2 *Scottish Planning Policy (SPP) (2014)*

The SPP sets out national planning policies which reflect Scottish Ministers' priorities for the operation of the planning system and for the development and use of land. The SPP promotes consistency in the application of policy across Scotland whilst allowing sufficient flexibility to reflect local circumstances. The SPP includes the Scottish Government's national planning policy on the conservation of the historic environment.

Regarding the historic environment, it includes an explicit recognition of the need for informed conservation, to understand the significance of historic sites and the potential impacts that any proposed scheme might have. It also emphasises the need

to 'enable positive change in the historic environment' based on well-informed understanding.

This document has been prepared in accordance with the following policies:

- General policies relating to the historic environment (policy numbers 135, 136 & 137)
- Conservation Area (143)
- World Heritage Sites (147)

5.2.3 Historic Environment Policy for Scotland (HEPS) (2019)

This policy statement sets out how HES expects others including LPAs to interpret and implement the SPP (2014) with regard to the historic environment, enabling good decision-making by a set of principles and policies. These state requirements for applications concerning development which are anticipated to affect the historic environment, as follows:

HEP1 Decisions affecting any part of the historic environment should be informed by an inclusive understanding of its breadth and cultural significance.

HEP2 Decisions affecting the historic environment should ensure that its understanding and enjoyment as well as its benefits are secured for present and future generations.

HEP3 Plans, programmes, policies and strategies, and the allocation of resources, should be approached in a way that protects and promotes the historic environment

If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.

HEP4 Changes to specific assets and their context should be managed in a way that protects the historic environment. Opportunities for enhancement should be identified where appropriate.

If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.

HEPS is intended to accompany the guidance note series *Managing Change in the Historic Environment*.

5.2.4 Managing Change in the Historic Environment: World Heritage (2016)

Published in 2016, this non-statutory guidance note about managing change in the historic environment forms part of a large suite of guidance notes. The guidance notes explain how to apply government policies, identify the main issues which can arise in different situations, to advise how best to deal with these, and to offer further sources of information. They are also intended to inform planning policies and the determination of applications relating to the historic environment.

Specifically, this note sets out the principles that apply to developments affecting World Heritage Sites and provides guidance on assessing the potential impact of proposed scheme.

Key issue 4:

When changes to World Heritage Sites are planned, adverse impacts should be avoided where possible. Assessment should focus on the impact these changes could have on the OUV of the World Heritage Site.

With regard to the setting of the WHS, it notes on p. 10:

'Setting' is the way the surroundings of a historic asset or place contribute to how it is understood, appreciated and experienced.

The setting of a World Heritage Site can extend more widely than the limits of any formal buffer zone. Planning authorities may have identified key views that are important for a Site's OUV, to allow the impact of development proposals to be assessed against this baseline.

In section 4, a five-stage process for assessing the nature of potential impacts and decision making in World Heritage Site contexts is set out:

- Stage 1: Understand the World Heritage Site
- Stage 2: Assess the potential impact of proposals on OUV
- Stage 3: Mitigate impacts through design and enhancement

At stage 1, assessors are directed primarily to the WHS OUV statement as well as other statutory designation information concerning heritage assets. It also requires the assessment of setting: see below section 5.2.5 for HES guidance.

At stage 2, assessors are required to use tools including EIA and Heritage Impact Assessment. Assessors are directed to the ICOMOS *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* (2011), as 'a starting point': see Section 5.1.

Regarding relevant LPA policy and guidance regarding the WHS, see also Section 5.3.

The HES guidance continues with a further two stages:

- Stage 4: Pre-application engagement (with the LPA and thus other stakeholders)
- Stage 5: The decision-making process

5.2.5 Managing Change in the Historic Environment: Setting (2016)

Specifically, there is clear guidance in the assessment of setting. The first five out of six key issues are relevant to this application:

1. Setting can be important to the way in which historic structures or places are understood, appreciated and experienced. It can often be integral to a historic asset's cultural significance. Planning authorities must take into account the setting of historic assets or places when drawing up development plans and guidance, when considering environmental and design assessments/statements, and when making decisions on planning applications.

2. Where development is proposed it is important to:

- *identify the historic assets that might be affected*

- *define the setting of each historic asset*
- *assess the impact of any new development on this*

3. *Setting often extends beyond the property boundary or 'curtilage' of an individual historic asset into a broader landscape context. Both tangible and less tangible elements can be important in understanding the setting. Less tangible elements may include function, sensory perceptions or the historical, artistic, literary and scenic associations of places or landscapes.*

4. *If proposed development is likely to affect the setting of a key historic asset, an objective written assessment should be prepared by the applicant to inform the decision-making process. The conclusions should take into account the significance of the asset and its setting and attempt to quantify the extent of any impact. The methodology and level of information should be tailored to the circumstances of each case.*

5. *In the light of the assessment described above, finalised development proposals should seek to avoid or mitigate detrimental impacts on the settings of historic assets.*

Setting is defined as follows:

'Setting' is the way the surroundings of a historic asset or place contribute to how it is understood, appreciated and experienced.

[Scheduled] Monuments, buildings, gardens and settlements were almost always placed and orientated deliberately, normally with reference to the surrounding topography, resources, landscape and other structures. Over time, these relationships change, although aspects of earlier settings can be retained.

Setting can therefore not simply be defined by a line on a map, and is likely to be unrelated to modern landownership or to curtilage, often extending beyond immediate property boundaries into the wider area.

There is guidance on how to define and analyse setting:

Key viewpoints to, from and across the setting of a historic asset should be identified. Often certain views are critical to how a historic asset is or has been approached and seen, or understood when looking out. These views were sometimes deliberately manipulated, manufactured and/or maintained, and may still be readily understood and appreciated today. Depending on the historic asset or place these could include specific points on current and historical approaches, routeways, associated farmland, other related buildings, monuments, natural features, etc.

Sometimes these relationships can be discerned across wide areas and even out to distant horizons...

Changes in the surroundings since the historic asset or place was built should be considered, as should the contribution of the historic asset or place to the current landscape. In some cases the current surroundings will contribute to a sense of place, or how a historic asset or place is experienced.

The value attributed to a historic asset by the community or wider public may influence the sensitivity of its setting. Public consciousness may place a strong emphasis on an asset and its setting for aesthetic reasons, or because of an artistic or historic association. Such associative values can contribute to the significance of a site, and to the sensitivity of its setting.

Whether or not a site is visited does not change its inherent value, or its sensitivity to alterations in its setting. This should be distinguished from the tourism, leisure or economic role of a site. Tourism and leisure factors may be relevant in the overall analysis of the impact of a proposed development, but they do not form part of an assessment of setting impacts.

Factors to be considered in assessing the impact of a change on the setting of a historic asset or place include:

- *whether key views to or from the historic asset or place are interrupted*
- *whether the proposed change would dominate or detract in a way that affects our ability to understand and appreciate the historic asset*
- *the visual impact on the proposed change relative to the scale of the historic asset or place and its setting*
- *the visual impact on the proposed change relative to the current place of the historic asset in the landscape*
- *the presence, extent, character and scale of the existing built environment within the surroundings of the historic asset or place and how the proposed development compares to this*
- *the magnitude of the proposed change relative to the sensitivity of the setting of an asset - sometimes relatively small changes, or a series of small changes, can have a major impact on our ability to appreciate and understand a historic asset or place. Points to consider include:*
 - *the ability of the setting to absorb new development without eroding its key characteristics*
 - *the effect of the proposed change on qualities of the existing setting such as sense of remoteness, current noise levels, evocation of the historical past, sense of place, cultural identity, associated spiritual responses*
 - *cumulative impacts: individual developments may not cause significant impacts on their own, but may do so when they are combined.*

Advice is given on mitigation:

Where the assessment indicates that there will be an adverse impact on the setting of a historic asset or place, even if this is perceived to be temporary or reversible, alterations to the siting or design of the new development should be considered to remove or reduce this impact.

5.3 Local Planning Policy: Edinburgh Local Development Plan (2016)

The LDP was adopted in November 2016. It sets out policies and proposals relating to the development and use of land in the Edinburgh area. The policies in the LDP are used to determine planning applications.

Concerning the WHS, in paragraphs 23-25, it comments that:

Two of Edinburgh's most widely acclaimed assets are its World Heritage Sites ['Old and New Towns...' and the 'Forth Bridge']. World Heritage Sites are places of outstanding universal value, recognised under the terms of the 1972

UNESCO Convention concerning the Protection of the World Cultural and Natural Heritage...

UNESCO requires every world heritage site to have a management plan which says how the Outstanding Universal Value (OUV) of the Site will be protected. OUV is the collection of attributes which make the area special and give Edinburgh its international importance.

Edinburgh's World Heritage Site Management Plans have been prepared by a partnership of the Council, Historic Environment Scotland and Edinburgh World Heritage. They provide a link between the international requirements of World Heritage, the planning process and the wider management issues involved in protecting complex Sites in Edinburgh. The Management Plans informs separate Action Plans and may be a material consideration for decisions on planning matters.

Concerning conservation areas, in paragraph 28, it comments that:

Across Edinburgh there are a number of designated conservation areas. These are areas of special architectural or historic interest, the character or appearance of which should be conserved or enhanced. A quarter of Edinburgh's urban area lies within a conservation area. Each conservation area has its own unique character and appearance that is identified in a character appraisal. The underlying principle behind the designation of the conservation areas is to maintain the variety of character that illustrates the history of Edinburgh. An ongoing review of conservation areas will consider amendments to boundaries, opportunities for enhancement, and the designation of new conservation areas. In conservation areas, consent is required for changes such as demolitions and window alterations, which elsewhere in the city wouldn't require permission. This additional level of control helps to ensure that small scale incremental changes do not damage the character of the conservation areas.

The relevant historic-environment policies, in part 2, section 3 of the LDP, are as follows. Many of these policies are followed by explanatory paragraphs which have been removed for clarity in the quotations below:

Policy Env 1 World Heritage Sites

Development which would harm the qualities which justified the inscription of the Old and New Towns of Edinburgh and/or the Forth Bridge as World Heritage Sites or would have a detrimental impact on a Site's setting will not be permitted.

Policy Env 6 Conservation Areas - Development

Development within a conservation area or affecting its setting will be permitted which:

- a) preserves or enhances the special character or appearance of the conservation area and is consistent with the relevant conservation area character appraisal*
- b) preserves trees, hedges, boundary walls, railings, paving and other features which contribute positively to the character of the area and*
- c) demonstrates high standards of design and utilises materials appropriate to the historic environment...*

6.0 SUMMARY OF PROPOSED SCHEME

At time of writing, no masterplan for the location or layout of the proposed bin hubs within the study area was available to the authors. Written criteria, objectives, a description and concept designs for hub types have however been set out which enable reasonable inference for the scheme as a whole. The following summary is derived from those written criteria.

In addition, CEC has installed a number of bin hubs outwith the World Heritage Site which have been sampled by the authors to assess how the concept designs have been realised.

6.1 Purpose of the proposed scheme

CEC has stated a number of reasons for the changes to waste collection in Edinburgh. One reason is to encourage greater rates of recycling as part of CEC's goal to become carbon neutral by 2030.¹³ The bin hubs will provide greater total capacity for recyclable waste and more collections than currently executed, on average.¹⁴ Placing all types of bin (both recycling and non-recyclable) together in a hub also has the aim of making recycling easier, encouraging greater use. Other purposes of the scheme include the creation of a more consistent service across the whole city, and a reduction in the loss of parking bays due to bins.¹⁵

6.2 Design of the proposed scheme

Existing bin collection services within the WHS will be replaced with on-street bin hubs. Most bin hubs will serve 50-55 properties and will comprise:

- 2 x 1280 or 1100 litre non-recyclable bins
- 2 x 1280 or 1100 litre mixed recycling bins
- 1 x 500 or 660 litre glass bin
- 1 x 240 litre bin food waste bin in housing

The bins will be surrounded by 'bull bar' railings to keep them in place and will be grouped so as to minimise loss of parking (the non-recyclable waste and mixed recycling bins will be emptied every two days).¹⁶

On streets marked in green on the map below, the new bin hubs will be replacing existing on-street bin provision (**Figure 2**). On streets marked in purple, bin hubs will be replacing the existing gull-proof bag and householder recycling box kerbside

¹³ <https://www.edinburgh.gov.uk/bins-recycling/communal-bin-review/4?documentId=12997&categoryId=20001> (accessed 05.05.2022).

¹⁴ <https://www.edinburgh.gov.uk/bins-recycling/communal-bin-review/2?documentId=12997&categoryId=20001> (accessed 05.05.2022).

¹⁵ <https://www.edinburgh.gov.uk/bins-recycling/communal-bin-review/2?documentId=12997&categoryId=20001> (accessed 05.05.2022).

¹⁶ <https://www.edinburgh.gov.uk/bins-recycling/communal-bin-review/2?documentId=12997&categoryId=20001> (accessed 05.05.2022).

collection service. 360 new bin hubs (containing over 2000 communal bins) are proposed, replacing 290 current bin locations of one or more bins. Although streets have been identified for the new scheme, as illustrated in **Figure 2**; information regarding the exact location of each hub has yet to be made available.

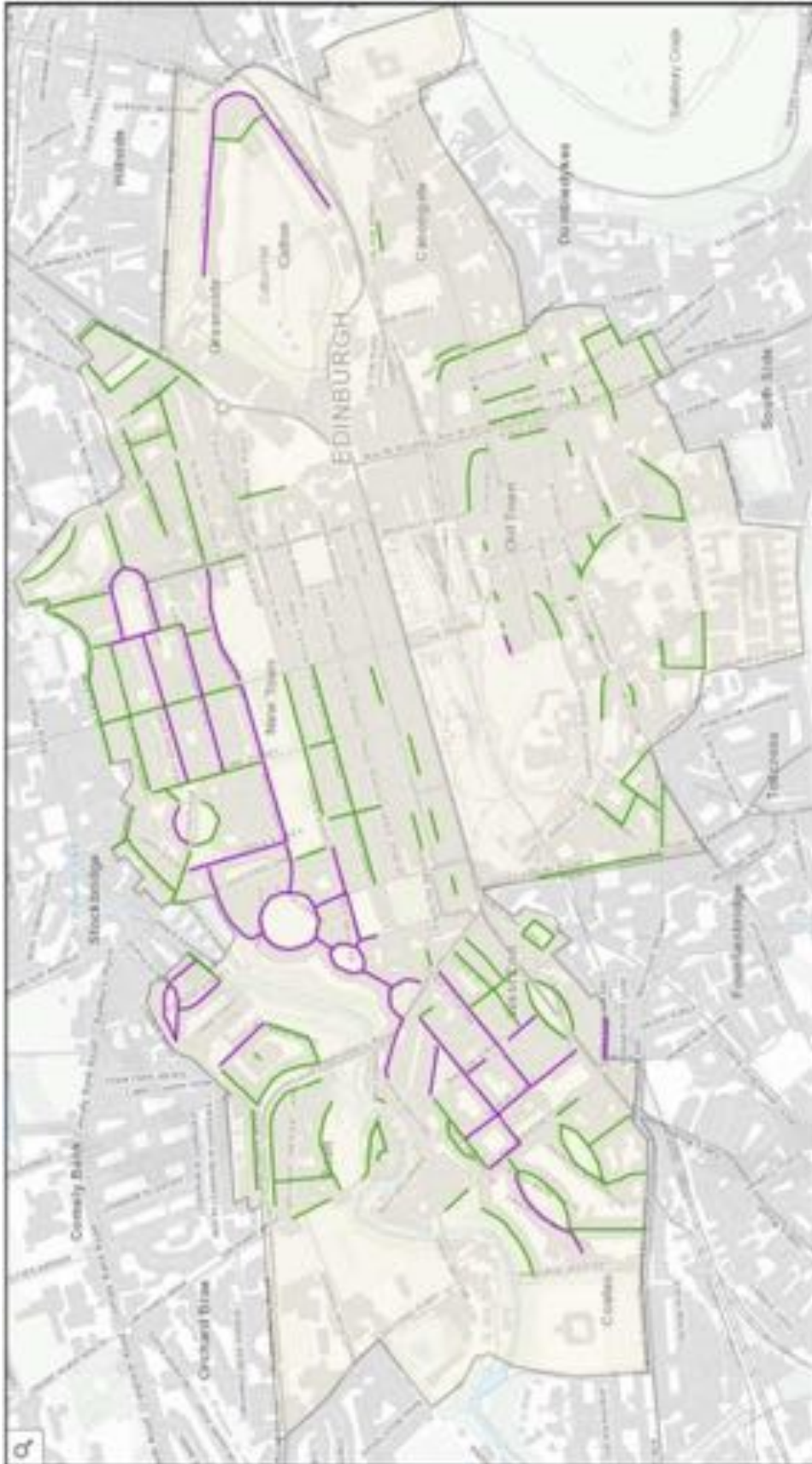


Figure 2 Existing waste collection services in the WHS with gull-proof bag streets shown in purple and on-street bin streets in green. ©CEC

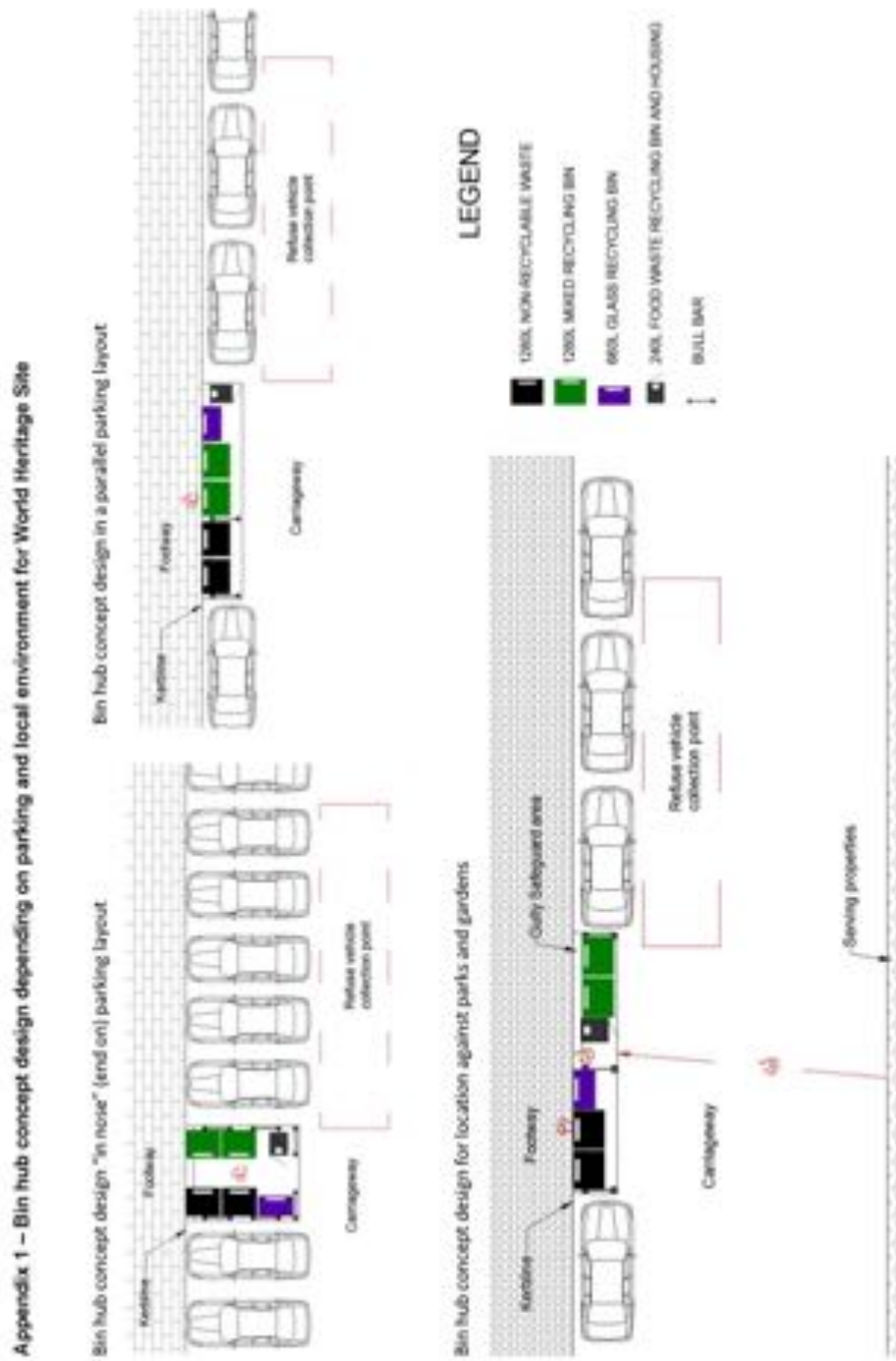


Figure 3 Bin hub concept design for the WHS ©CEC



Figure 4 Example bin hub as built outside the study area in Pitt Street. This is an “in nose” (end on) parking layout’ configuration.



Figure 5 Example bin hub as built outside the study area in Pitt Street, showing hub extending beyond most parked cars.



Figure 6 Example bin hub as built outside the study area in Gosford Place. This is a ‘parallel parking layout’ configuration.



Figure 7 Example bin hub as built outside the study area in Gosford Place. Hub length appears longer than on the concept design.



Figure 8 Example bin hub as built outside the study area in Smith Place. This is an “in nose” (end on) parking layout’ configuration. A larger gap can be seen between bins than shown on concept design.



Figure 9 Example bin hub as built outside the study area in Dalmeny Street. This is a ‘parallel parking layout’ configuration. Hub length appears longer than on the concept design.

It should be noted that a ‘Gulley Safeguard area’ is shown in the concept design for locating hubs ‘against parks and gardens’ but not in the “in nose” (end on) parking

layout' or 'parallel parking layout'. However, in many streets in the study area, there is historic street surfacing/detailing (gullies, mounting blocks etc) which would also require a 'Gulley Safeguard area'. This means that in reality, and as demonstrated by examples of these hubs as already built in parts of the city, the concept designs are optimistic with regard to the size of the hubs (Figure 4). The railed enclosures in the 'in nose' configuration seem to project further into the street than the average car length even without the inclusion of a 'Gulley Safeguard area' (Figure 5). Also the railed enclosures are larger than those shown on the concept designs, with more space allowed between bins, possibly because it has been found to be practically impossible to manoeuvre bins within the confines of the railed enclosures as drawn.

Similarly, the concept design for locating hubs 'in parallel parking layout' is unrealistically compact: again, as demonstrated by as built examples of these hubs, the length of the hubs seems generally longer than that shown on the concept designs (Figure 6, Figure 7).

In addition, the bin hubs photographed as installed have red-and-white reflective tape strips applied to the railings and to some of the bins themselves, presumably to increase visibility to drivers; this is not part of the concept design and it is unclear how it would be compatible with proposed mitigation to make the hubs less visually obtrusive in within the World Heritage Site.

6.3 Proposed mitigation of heritage impacts

The following mitigation measures were referenced in the 2021 EIA Screening Opinion document:

- Location where possible on the park/garden side of the road among parked cars;
- Location of bin hubs within parking bays rather than at the end;
- Relaxation of stated resident walking distances of 50m to minimise total number of bin hubs;
- Design and finish of railings/corralling and bins to be made 'appropriate' to the streetscape of the WHS: black powder-coated bespoke corralling, deeper green mixed-recycling-bin lids, glass lids to have only the flap purple; and
- No bins placed on main arterial routes.

The Transport and Environment Committee's Business Bulletin of 27 January 2022 made clear that many of these measures and other possible mitigations suggested by EWH, such as increasing the frequency of collections and retaining current food and glass collections, both of which measures would reduce the number of bins on the street, would not be considered.

It should be noted that as per Councillor Lesley Macinnes's response to enquiry by the New Town and Broughton Community Council on 15 March 2022, even if these mitigations were not carried out, CEC would still conclude that there would be no significant effect of communal bin hubs on the heritage assets.

7.0 IMPACT ASSESSMENTS: NEW TOWN CONSERVATION AREA

7.1 West of Queensferry Street

7.1.1 Eglinton Crescent



Figure 10 Eglinton Crescent, north side, looking east.



Figure 11 Eglinton Crescent, north side, looking west.

Eglinton Crescent comprises two parts, a straight west part, and a curved east part. The terraced houses in both parts are of three storeys with attic and basement; they date from the late nineteenth century and were designed by John Chesser. The houses in the curved crescent, in particular, are characterised by stacked bay windows, with curved fronts at basement and ground floor level and a canted bay above, decorated with repeated balustrading. This relatively subtle change in window design adds visual interest to the repeating façades. In the straight part of the crescent, the buildings on the north side are decorated with iron brattishing at roof level. There are views from the west end of the crescent towards Donaldson's Hospital, while views towards the southwest prominently feature the spires of St Mary's Episcopal Cathedral, which is classified as a focal point in the New Town conservation area character appraisal. The curved part of the crescent is visually complemented by Glencairn Crescent opposite, and contrasted by the central enclosed garden. There is no pavement on the garden side of the crescent.

7.1.2 Palmerston Place



Figure 12 Palmerston Place, west side, corner of West Maitland Street, looking north.



Figure 13 Palmerston Place, east side, looking north.



Figure 14 Palmerston Place, west side, looking south.

The view north along Palmerston Place from the junction with West Maitland Street is CEC's key view C17; this view takes in George Gilbert Scott's St Mary's Episcopal Cathedral, which is identified as a focal point in the New Town Conservation Area Character Appraisal. Palmerston Place currently has mixed bin provision: the south end is served by some on-street bins, while the north end is served by gull-proof bags.

The west end of the cathedral faces on to Palmerston Place, and the west portions of the north and south elevations, and in particular the western spires, are prominent in views in both directions along Palmerston Place. From the junction with West Maitland Street, Peddie & Kinnear's 1870s Palmerston Place Church is also a key feature. The church is Italianate in style, with paired octagonal cupolas, and is currently negatively affected by the placement of two bins directly in front of the main façade. These views are framed by terraces by John Lessels on the east side (1870s, although in a style recalling 1820s New Town work with banded rustication), and by John Chesser on the west side (in a more contemporary 1870s style with bay windows).

At the centre of the street, views to both north and south are dominated by the proximity of the west end of the cathedral, which is emphasised by the gardens around it. Adjacent to the cathedral is the seventeenth-century Easter Coates House, the oldest building in the New Town.

The gull-proof bag section of the street is between junctions with Chester Street and Rothesay Place. Views south in this area prominently feature the cathedral, while a key element of views to the north is the tower of the former Belford Church (now Belford Hostel) by Sydney Mitchell and Wilson. As at the south end of Palmerston Place, the houses on the west side are by John Chesser; on the east side they are by Alexander White.

As is typical in views in the West End, views along Palmerston Place are characterised by well-designed nineteenth-century terraced housing, but what is particularly

valuable about Palmerston Place in particular is the interplay between the three church buildings, and how views towards them develop as the viewer moves along the street.

7.1.3 Manor Place



Figure 15 Manor Place, east side, looking north.



Figure 16 Manor Place, east side, looking south.



Figure 17 Manor Place, west side, looking south.



Figure 18 Manor Place, east side, looking north.

Views along Manor Place are dominated by George Gilbert Scott's Episcopal Cathedral, in particular the east end, which faces on to Manor Place, and the crossing tower. At the south end of the street, views are framed by 1820s terraced houses by Robert Brown. They are typically of two storeys plus basement, with a third storey on the end pavilions, which are also highlighted with extra architectural details such as pedimented central windows, and prominent cornice. At the north end of Manor Place the terraces are later, by John Lessels, but mimic some aspects of Brown's design such as rustication at ground floor level, and a relatively flat façade where generally by the later nineteenth century bay windows would have been preferred. This deliberate emulation of the earlier design gives views along manor place a stronger sense of uniformity. At the centre of Manor Place the cathedral is especially prominent, emphasised by the gardens around it. Page\Park's West End Medical Practice is low-lying, an example of contemporary development which aims not to detract from its historic surroundings.

7.1.4 Melville Street



Figure 19 Melville Street, south side, looking west



Figure 20 Melville Street, north side, looking east



Figure 21 Melville Street, north side, looking west

The view from Queensferry Street along Melville Street towards the east end of St Mary's Episcopal Cathedral is view C15 in CEC's documentation of key views in the city centre. It is also featured in the Conservation Area Character Appraisal for the New Town conservation area as a terminated view, and the cathedral in general is identified as a focal point in the same document. The view west towards the cathedral is therefore one of the city's most important views. It is characterised by the extreme contrast between the uniformity and horizontal emphasis of the Robert Brown's early nineteenth-century terraces and the verticality and neo-gothic extravagance of George Gilbert Scott's cathedral. The former can still be appreciated in views to the west, and views in both directions also feature John Steele's statue of Viscount Melville, at the centre of Melville Crescent (Melville Street's halfway point). There is a high degree of authenticity in Melville Street, with the development surviving intact, and a sense of changing architectural tastes throughout the nineteenth century with the addition of

the gothic cathedral. However a number of changes negative to the special interest of the street have been made, in particular the change of road surface from setting to tarmac and visually intrusive changes to the pavement surface, as well as a proliferation of street furniture including a lamppost directly in front of the east end of the cathedral.

7.2 Moray Estate

7.2.1 Randolph Crescent



Figure 22 Randolph Crescent, east side, looking south-west.



Figure 23 Randolph Crescent, east side, looking north-west.

Randolph Crescent is a semi-circular crescent along one side of an enclosed central garden. All views around Randolph Crescent have the gardens on one side. There is only a minimal pavement on the garden side. Views are dominated by James Gillespie Graham's 1822 terraced houses in two blocks, one on either side of the junction with Great Stuart Street. Each block is terminated at both ends by a pavilion of four bays, highlighted by a stepping-forward of the façade and use of Tuscan pilasters between the bays. The road surface is setted. The view around Randolph Crescent is characterised by the contrast between the high terraces and the central garden, and by the revealing of uniform houses as the viewer moves around the crescent. Near the centre of the crescent, views also feature the listed early twentieth century lamp standard by E. J. MacRae.

7.2.2 Great Stuart Street



Figure 24 Great Stuart Street, west side, looking north



Figure 25 Great Stuart Street, west side, looking south

Great Stuart Street is characterised by direct views north and south towards the wooded gardens at the centre of Ainslie Place and Randolph Crescent respectively. These views are framed by James Gillespie Graham’s terraces, notable for their rusticated entrance floors and anthemion and palmette window-guards at first floor level. The road surface is setted, and views towards Randolph Crescent include E. J. Macrae’s listed lamp standard, one of only three of this type surviving in the city. There is a very high degree of authenticity, with little alteration to the exterior of the buildings since construction.

7.2.3 *Ainslie Place*



Figure 26 Ainslie Place, south side, looking west



Figure 27 Ainslie Place, west side, looking north



Figure 28 Ainslie Place, north side, looking west



Figure 29 Ainslie Place, east side, looking south

Ainslie Place is an oval-shaped street centred on an enclosed garden. There is no pavement on the garden side. Views are dominated by James Gillespie Graham’s palace-fronted terraces, particularly notable for their rusticated entrance floors and anthemion and palmette window-guards at first-floor level. The relatively small area of the Place compared to the height of the buildings (at three storeys plus attic and basement) gives a particularly strong sense of verticality and enclosure. The streets are setted. There is a very high degree of authenticity in Ainslie Place, with very little external alteration to the buildings.

7.2.4 Moray Place



Figure 30 Moray Place, north side, looking east.



Figure 31 Moray Place, north side, looking west.

Moray Place is the centrepiece of the Moray Estate development, its highest-status address and most elaborately designed street. It is a circular street surrounding the central Moray Place Bank Gardens. The terraces, by James Gillespie Graham, are made up of palace-fronted blocks, the central blocks with tetrastyle porticoes of engaged Tuscan columns with a blank entablature and triangular pediment above. The houses are finished with ironwork including anthemion and palmette window-guards at first-floor level and decorative lamp standards which are the main source of lighting on the built-up side of the street. There are modern streetlights on the garden side, although there has been some effort (only partially successful) to choose a design which complements the iron lamp standards. Additional street furniture has also been kept to a minimum. Views around Moray Place are characterised by the dramatic unfolding of Gillespie Graham's buildings as the viewer moves around the square, which is enhanced by the sloping of the street, which is highest at its south-east corner. The street is setted. Although there have been some minor alterations to the buildings at attic level, Moray Place generally has a very high degree of authenticity and has changed little externally since it was established as the jewel in the crown of the Moray Estate.

7.2.5 St Colme Street / Albyn Place



Figure 32 Albyn Place, north side, looking west



Figure 33 St Colme Street, south side, looking east

Views along St Colme Street/Albyn Place are gently sloping downwards from east to west. They are framed by the gardens to the rear of Charlotte Square on the south side,

and James Gillespie Graham’s palace-fronted block on the north side, slightly stepped to accommodate the topography and featuring cast-iron balconies at first-floor level. Parts of St Colme Street are setted. Prominent in views from Albyn Place is David Bryce and John Rhind’s Catherine Sinclair monument, in a neo-gothic style to recall the thirteenth-century Eleanor Cross monuments erected in twelve towns in England.

7.2.6 *Doone Terrace / Gloucester Place*



Figure 34 Doone Terrace, west side, looking north-east



Figure 35 Doone Terrace, north side, looking east towards Gloucester Place

Doone Terrace is a long, curving street which becomes Gloucester Place, connecting Moray Place with India Street. The topography of the site, which slopes dramatically downwards on the north side of the terrace, means that there are houses on only one side of the street; these are made up of a palace-fronted block by James Gillespie Graham typical of the Moray Estate. On the other side of the street, a hedge separates the road from Moray Bank Gardens; the view is in part defined by its relationship by the contrast between the built-up south and open north side. The street also slopes slightly downwards from west to east. The result is a dramatically curved street, with Gillespie Graham’s building gradually revealed as the viewer moves eastwards. Distant views are along Gloucester Place, where there are terraces by Thomas Bonnar. These are more severe than Gillespie Graham’s, and are characterised by banded rustication at ground floor level.

7.2.7 *Glenfinlas Street*



Figure 36 Glenfinlas Street, east side, looking north.



Figure 37 Glenfinlas Street, west side, looking south.

Glenfinlas Street runs north-south, connecting Ainslie Place with Charlotte Square; the north part of the street is currently served with gull-proof bags. The street slopes quite steeply towards the south. The terraces along Glenfinlas Street, and terminating views to the north, are mostly by James Gillespie Graham and date from the 1820s, although the side elevation of Robert Adam's 10-11 Charlotte Square is also visible at the south end of the street. 1-4 Charlotte Square are late twentieth century additions, designed to match exactly Gillespie Graham's work, including railings with decorative lamp standards. Views north and south along Glenfinlas Street are framed by the terraces on the west side and gardens at the rear off Charlotte Square on the east side, and offer views through to Ainslie Place to the north and Charlotte Square to the south. Glenfinlas Street plays a role in the setting of Adam's Charlotte Square, and considerable effort has been taken to maintain its authenticity as much as possible, in particular with the design of 1-4 Glenfinlas Street but also with the introduction of aesthetically sympathetic lampposts on the east side of the street.

7.3 Stockbridge

7.3.1 *St Bernard's Crescent*



Figure 38 St Bernard's Crescent, east end, looking north



Figure 39 St Bernard's Crescent, east end, looking south



Figure 40 St Bernard's Crescent, west end, looking east



Figure 41 St Bernard's Crescent, west end, looking south

The whole of the north side and the east part of the south side of St Bernard's Crescent were designed by James Milne and built in the 1820s on land which was owned by Sir Henry Raeburn. They are designed with liberal use of the Doric order, which is characteristic of Stockbridge and of the Greek Revival period in which they were built. The particularly strong appeal of the Greek Revival in Edinburgh adds to their interest.

The palace-fronted north side is dominated by a centre block or frontispiece of fifteen bays, which includes a Doric giant order. There are cast-iron railings around the sunken areas which include decorative lamp-standards. The south-west portion of the crescent was completed in the 1870s by John Webster, and features bay windows and banded rustication. The terraces face a central enclosed garden, and there is no pavement on the garden side; the streets are setted.

7.3.2 Danube Street



Figure 42 Danube Street, west side, looking north



Figure 43 Danube Street, west side, looking south

Danube Street is a gently curving street running south from St Bernard's Crescent towards Dean Terrace. Views north along the street are towards St Bernard's Crescent, in particular its central enclosed garden, while views south are towards the Water of Leith, the wooded area around the river and, at a higher level, the rear of Moray Place. The view is framed by James Milne's 1824 terraces. At two storeys plus basement, the houses are relatively modest in size, which is characteristic of Stockbridge in comparison to the New Town. They are rusticated at ground floor level, with decorative ironwork balconies above, and the street is articulated with an advancement of six bays at the centre on each side which has a solid, rather than a balustraded, parapet. The street is setted. Danube street has a high level of authenticity, with little change since the buildings were erected.

7.3.3 Carlton Street



Figure 44 Carlton Street, east side, looking north



Figure 45 Carlton Street, west side, looking south

Carlton Street runs from the east end of St Bernard’s Crescent south towards Dean Terrace. Views to the north are towards the curving end of St Bernard’s Crescent, while views south are towards the Water of Leith and the wooded area around it, and at a higher level the rear of buildings on India Place. These views are framed by terraced by James Milne, designed in 1824. The terraced houses are typically of three bays, with larger end-terrace houses of five bays, and are rusticated at ground floor level with decorative ironwork balconies above. The street is highly uniform, and has a high degree of authenticity with little external alteration since the erection of the buildings. The street is setted.

7.4 First New Town

7.4.1 Junction of George Street and Frederick Street



Figure 46 Frederick Street, east side, looking north



Figure 47 Frederick Street, east side, looking north

The view north along Frederick Street from the junction with George Street is designation as Key View C12, view A1. Bin hubs are proposed for the section of Frederick Street between the junctions with Thistle and Queen Streets. The view to the north is terminated by Playfair’s church of St Stephen, while the downward sloping of the street also allows for spectacular distant views towards Fife. The buildings lining Frederick Street are typically late-eighteenth century New Town tenement terraces with shopfronts added in the nineteenth century. The view north along Frederick Street is one of the more dramatic in Edinburgh (and its designation recognises it as such), but some measures have already been taken which negatively affect its appearance, in particular the proliferation of street furniture, partial and now deteriorating surfacing of its setted street paving with asphalt, and the use of on-street bins in some parts.

7.4.2 Junction of Queen Street and New Castle Street



Figure 48 Queen Street, north side, looking east



Figure 49 Queen Street, south side, looking east

The view east along Queen Street from the junction of Queen and North Castle Streets is designated as Key View C11a. Bin hubs are proposed on Queen Street from this point to the junction with Hanover Street. Queen Street Gardens runs along the north side of Queen Street, while the south side is made up of generally late-eighteenth-century terraced housing which was part of the First New Town development. Viewed from the junction with North Castle Street, the view is characterised by the contrast between the regular terraces and the thick vegetation of the gardens; the view is to open sky to the east, due to the downward sloping of York Place towards Picardy Place. Features of the view include the Tudor turrets of John Henderson’s 1852 Queen Street Church, and more distantly the Scottish National Portrait Gallery by Robert Rowand Anderson. The view is also notable for its dimensions: the sheer length and width of the street makes an impression, and historically would have made a dramatic contrast with the cramped conditions of the Old Town.

7.5 Second New Town

7.5.1 India Street



Figure 50 India Street, east side, looking south



Figure 51 India Street, west side, looking south



Figure 52 India Street, east side, looking north



Figure 53 India Street, west side, looking north

India Street runs north-south and connects Heriot Row to Royal Circus and Gloucester Place. The street slopes downwards in a northerly direction. The majority of the terraces are by William and Lewis A. Wallace and date from the early nineteenth century, and the street is setted. Views to the north are terminated by Queen Street gardens, but the topography of the site is such that views to the south include long-distance views north across the Firth of Forth into Fife. The effect of the recession of uniform terraces (mostly mansion houses) framing these northerly views is dramatic and highly effective.

7.5.2 Heriot Row



Figure 54 Heriot Row, north side, looking east



Figure 55 Heriot Row, north side, looking west



Figure 56 Heriot Row, south side, looking east



Figure 57 Heriot Row, south side, looking west

Heriot Row runs east to west, connecting Abercromby Place with Darnaway Street. It is bounded on the south side by Queen Street Gardens, and on the north side by terraced housing by Robert Reid and William Sibbald dating from the early nineteenth century. The street is setted. Reid and Sibbald's work is of palace-fronted blocks with the central frontispiece and end pavilions emphasised with an additional storey and balustrading at parapet level. Some of the effect has been lost with piecemeal development of upper storeys along the street, but the view along Heriot Row is still characterised by the contrast between regular terraced housing to the north and the natural surroundings of Queen Street Gardens to the south. Heriot Row has a high degree of authenticity as it retains a number of original features, such as decorative lamp standards outside the houses. The modern freestanding lampposts which have been introduced are of mixed quality, but generally reflect the style of early streetlighting in Edinburgh. The general appearance and effect of the view has remained the same since the early nineteenth century.

7.5.3 *Royal Circus (North)*



Figure 58 East end of Royal Circus looking north-west.



Figure 59 West end of Royal Circus looking north-east.

Royal Circus is the western terminal feature of the Second New Town (Drummond Place being the eastern feature) and it was designed by W. H. Playfair in 1820. The buildings on the north side of Royal Circus form a crescent around a central enclosed garden. There is no pavement on the garden side. It is palace-fronted, the central and end blocks defined by an extra storey in height (four storeys plus basement, while the linking blocks have three) and Tuscan pilasters. The façade is further articulated with iron window-guards at first floor level and rustication on the ground floor. The screening effect of the central garden means that the buildings are gradually revealed as the viewer moves around the Circus. The relatively enclosed space between the garden and the buildings emphasises their height and gives them a sheer, cliff-like appearance. The street is setted.

7.5.4 Great King Street



Figure 60 Great King Street, north side, looking east



Figure 61 Great King Street, south side, looking east



Figure 62 Great King Street, south side, looking west



Figure 63 Great King Street, south side, looking west

Great King Street runs east-west between Royal Circus and Drummond Place and was conceived as the central throughfare of the Second New Town. It was designed by Robert Reid and William Sibbald c.1810, and construction began in 1814. It is made up of four palace-front blocks, the street bisected centrally by Dundas Street. As befits its status, the palace-fronts are especially grand, with Ionic pilasters on the central and end raised blocks, and pedimented windows at first floor level in the central and end bays of each block. The street is setted, and also retains its original stone gullies and mounting blocks. The views in both directions are towards the central enclosed gardens of Royal Circus and Drummond Place, and in the latter direction includes a listed police box, designed by E. J. Macrae. The most important feature of the views, however, are their framing by the uniform fronts of Reid and Sibbald's buildings; the status of the street makes this one of the most important views in the Second New Town. Great King Street has a very high degree of authenticity, as the exterior of the buildings remains largely unchanged since their construction, and the street retains its ironwork and historic road surface and other furniture. Later additions, such as the freestanding street lights, have been modestly and relatively tastefully designed to complement the street, and other street furniture is minimal.

7.5.5 Northumberland Street



Figure 64 Northumberland Street, north side, looking east



Figure 65 Northumberland Street, north side, looking west



Figure 66 Northumberland Street, south side, looking east



Figure 67 Northumberland Street, south side, looking west

Northumberland Street runs from east to west across the Second New Town, acting as one of two secondary thoroughfares either side of Great King Street (along with Cumberland Street to the north). The majority of the street was designed by Robert Reid and William Sibbald in the early nineteenth century, and is characteristic of New Town design with flat, uniform facades rusticated at ground floor level. Although the street was designed by Reid and Sibbald as one unified design, development in Northumberland Street was piecemeal, meaning that there is a relative lack of uniformity compared to some New Town streets; there has also been varied alteration at dormer level. However, from street level there is still a high degree of authenticity, and the road retains its original setted surface.

7.5.6 Drummond Place



Figure 68 Drummond Place, north-east corner, looking east



Figure 69 Drummond Place, north-east corner, looking west



Figure 70 Drummond Place, south-east corner, looking east



Figure 71 Drummond Place, south-west corner, looking north

Drummond Place is one of the key developments of the Second New Town, acting as its eastern terminus. It has an elongated D-shape, curved on its east end, and surrounds a central enclosed garden. Drummond Place was designed by Robert Reid and William Sibbald in 1804, with some alterations to the design by Thomas Bonnar a decade later. The topography of the site is such that the exedral east end is slightly raised. The houses comprise large, palace-fronted blocks of three storeys plus basement, and an extra storey on the pavilion and centre blocks of each part of the square. These are also enhanced with Ionic pilasters and pedimented windows. The street retains its setted surface, and the iron railings include decorative lamp-standards which are the primary street-lighting for the built-up side of the street. Street furniture has been kept to a minimum and where there have been later additions, such as the street lighting on the garden side, it has been modestly designed to complement the original design. At the centre of the west end of the street there is a listed police box by E. J. Macrae.

7.5.7 Abercromby Place



Figure 72 Abercromby Place, north side, looking west (including gull-proof bag)



Figure 73 Abercromby Place, south side, looking east

Abercromby Place is a slightly curved street. It runs east-west and is bordered by a large private garden to the south. The north side of the street consists of two fairly identical terraces by Robert Reid and William Sibbald (1806-19) with later additions including a porch by David Bryce at number 30 (The Royal Scots Club). Each terrace is of 44 bays and three to four storeys in ashlar sandstone over a rock-faced rusticated basement. The street retains its iron railings including decorative lamp-standards.

7.6 Third New Town

7.6.1 Regent Terrace



Figure 74 Regent Terrace, north side, looking west.



Figure 75 Regent Terrace (west end of the street), north side, looking east.

Two views from Regent Terrace are designated as Key Views: the view west towards the Tron Spire (view C07a) and south towards Salisbury Crags (view C07b). Impressive views are available along the street in both directions, however. Regent Terrace runs along the south and east side of Calton Hill, and was developed as part of the Third, or Eastern New Town by Playfair in the 1820s and 30s.



Figure 76 Regent Terrace, looking south towards the Burns Monument.



Figure 77 Regent Terrace, looking south towards Arthur Seat.

Playfair's terraces of two storeys plus basement (many with attic added later) are particularly notable for their Doric entrance porticoes, cast-iron balconies, and iron railings with decorative lamp-standards. They run only along the north side of the street, while on the south side there is a steep wooded area separating Regent Terrace from Regent Road, running parallel at the lower level. Regent Terrace is setted. Looking to the west along Regent Terrace allows a distant view towards the centre of Edinburgh, featuring the Tron Spire, while views to the east are terminated by trees on the east side of Carlton Terrace. An impressive view of Salisbury Crags is available through the trees to the south, and the Burns Monument can be viewed from the west end of the terrace. Regent Terrace is one of the most important streets in the Third New Town development and was deliberately designed with the effects of views along, towards, and away from it in mind.

7.6.2 Royal Terrace



Figure 78 Royal Terrace, south side, looking west.



Figure 79 Royal Terrace, north side, looking east

Edinburgh Key View C07c is along Royal Terrace, towards Greenside Church to the east. Royal Terrace runs along the north side of Calton Hill, and is part of the Third or Eastern New Town development of W. H. Playfair in the 1820s and 30s. The wide, setted street is lined with Playfair's terraces on the south side, and the downward-sloping London Road Gardens on the north side, which separate Royal Terrace from the parallel London Road. Playfair's palace-fronted blocks are worked around a system of seven pavilions: four Ionic hexastyle flanking pavilions, two composite heptastyle pavilions, and a central decastyle composite pavilion. Additionally the

composite order is more lavish in the central pavilion, with two layers of acanthus leaves under the volutes instead of one. The effect is of a highly planned, uniform design, the order of which contrasts the relative chaos and natural nature of Regent Terrace Gardens. The width of the road and lack of railings on the north side means there is a sense of wide open space.

7.7 Conclusions

A very important aspect of the special architectural and historic interest of the New Town conservation area is that almost every street within it was specifically designed as a homogenous unit, and was designed with views along, to and from that street in mind. Each development in the New Towns, Stockbridge, and the West End was designed with an awareness of the underlying topography and of existing streets and features, meaning that few if any views are left to chance. They were also designed with a very high level of attention to detail, meaning that elements of ironwork, street surfaces, and street furniture were carefully considered.

In the 150-250 years since most of the New Town streets were designed they have been exceptionally well-preserved, meaning that walking down many of these streets today replicates an authentic experience of late eighteenth- or early nineteenth-century Edinburgh. This means that the New Town conservation area in general, and the streets currently served by gull-proof bags in particular, are very sensitive to any form of change. This sensitivity is heightened by the typically extremely uniform quality of street design in the New Town, where a sense of order and cleanliness was created by a combination of geometric street-planning, wide streets, and typically repeating flat residential façades, with some palace-fronted blocks accented by more elaborate frontispieces and pavilions, generally at the centre and ends of streets. Enclosed gardens introduced natural elements to contrast the houses. All of these elements were deliberately in contrast to the increasingly chaotic condition of the Old Town by the eighteenth century.

This combination of factors means that on many streets there are realistically no places where a bin hub could be installed where it would not have a negative impact on the special interest of the conservation area. This is especially clear in streets where some bins are already in place. In Palmerston Place, for example, bins have been placed directly in front of Palmerston Place Church, one of the key elements of Edinburgh Key View C17. CEC's proposed mitigation includes the location of bin hubs where possible on the garden side of streets; the assessment in this document shows that the New Town gardens play a highly important role in views along and around streets in the conservation area, and that they were conceived as a key part of the New Town developments.

In some cases, there has been a concerted effort in recent decades to maintain the authentic experience as far as possible, for example by keeping signage to a minimum and by installing visually sympathetic lampposts as on Great King Street, Moray Place, and Heriot Row. . This intention to preserve the authenticity of New Town streets has been taken a step further by the recent Scotland Street project, which saw replica historic lighting installed. However other streets in the New Town conservation area are evidence of how a combination of small changes can have a considerable negative effect on a street. For example, the changes to street and pavement surface and proliferation of street signs on Melville Street. In this context, while the addition of bin hubs might seem like in itself a minor change to streets which

have already been altered, it would in fact be a contribution to an ongoing degradation which results in a slow stripping of the authenticity which is absolutely at the heart of the special interest of the New Town conservation area. The minor alterations proposed by CEC to bin hubs in the conservation area compared to the rest of Edinburgh, such as changes to the shade of the colours and to the amount of colour on the bins, would not significantly alter the negative appearance of the bins.

The retention of historic street surfaces is highlighted in the CACA as a key element of the conservation area, which states that they 'should be rigorously protected and used as guiding references in new works'; there is a concern that the introduction of bin hubs compromises the visual integrity of these street surfaces, as well as the possibility of physical damage to paving, setts or gulleys during the installation of railings and bin housing.

Parked cars are an ongoing problem in the New Town conservation area, and they have a significant negative impact on its special interest. However, parked cars are transitory; streets are not always entirely full and cars can be temporarily removed if desired, and are on occasion, for example if the street is to be used for filming. The proposed bin hubs would be by nature permanent, as some elements would be immovable. CEC's current proposed mitigation of locating bin hubs between parking bays assumes that they will therefore always be masked by parked cars, which will not necessarily always be the case.

The sensitivity to change of the New Town conservation area is **high**. This is based on the high concentration of Category A listed buildings, which satisfies the criterion for high sensitivity in **Table 1** of 'conservation areas containing very important buildings'. The introduction of bin hubs is regarded as a **small change** to the heritage asset, as while key visual links within the conservation area and between the conservation area and its surroundings would be unaffected, the introduction of bin hubs, especially in their proposed numbers, would be a noticeable change. The effect is judged to be **moderate** overall. While **Table 3** allows for either a minor or moderate change to be recorded in these circumstances, we have assessed that the importance of the buildings within the conservation area, as well as the contribution of the conservation area to the WHS, meant that a small change to the New Town Conservation Area would result in a moderate adverse effect.

8.0 IMPACT ASSESSMENTS: OLD TOWN CONSERVATION AREA

8.1 Ramsay Garden



Figure 80 Ramsay Gardens, looking west



Figure 81 Ramsay Gardens, looking north-east

Ramsay Garden runs east to west, just north-east of the castle Esplanade. Views along Ramsay Garden in both directions are highly enclosed, terminated by parts of the Ramsay Garden development itself to the west, and by Ramsay Lane to the east. Buildings along the street are typically early eighteenth century in origin, but have been substantially remodelled in the late nineteenth century as part of a planned development by Professor Patrick Geddes. Some areas were also built new by Geddes. The result is a deliberately dense, vertical residential area with architectural features varied by design, including original eighteenth-century, Arts-and-Crafts, and Scots Baronial touches. Ramsay Garden is extremely characterful, and its designer intended to evoke the feeling of original Old Town spaces with small courts surrounded by vertiginous tenements. The street as it stands, however, is unique in Edinburgh and is in itself an important part of the architectural history of the Old Town.

8.2 Cockburn Street



Figure 82 Cockburn Street, north side, looking east



Figure 83 Cockburn Street, north side, looking east, looking west

Cockburn Street is a steep, curving street which slopes downwards from the High Street in the south to Market Street on its north side. The majority of the buildings on the

street were designed by Peddie & Kinnear in a Baronial style in the mid-nineteenth century, although at the west end of the street much of its south side is taken up with the rear of the City Chambers. The character of the street is highly vertiginous, due to the combination of the height of the buildings and the steepness of the street itself. It also has a bright, bustling character, created by the number of open shopfronts and awnings in different colours. Currently parts of the street are dominated by temporary outdoor restaurant seating, and negatively affected by the existing bins, which take away from the authenticity of the street, which is otherwise an excellent example of the marrying of dramatic Baronial architecture with a commercial function.

8.3 Jeffrey Street



Figure 84 Jeffrey Street, south side, looking east



Figure 85 Jeffrey Street, north side, looking west



Figure 86 Jeffrey Street, south side, looking north towards Calton Hill

The view from Jeffrey Street north towards Calton Hill is Edinburgh Key View C06, and Calton Hill is also a designated focal point in the Old Town Conservation Area Character Appraisal. The combined retail and residential buildings on each side of the street were erected in the late nineteenth century and were designed by James Lessels and Harry Ramsay Taylor in a Baronial style. However, the most dramatic views from Jeffrey Street are available along the open north side of Jeffrey Street, above Waverley Station towards Calton Hill. The view is dominated by the rear side of St Andrew's House, but also prominently features the remains of the Old Calton Jail, the Dugald Stewart Monument, Nelson's Monument, and the Political Martyrs' Monument as well as a glimpse of the National Monument. To the northwest there is an almost equally impressive view of the rear of Waterloo Place, the Waverley Hotel and, further to the west, the Scott Monument. This is an exceptional view, and one which can be more

fully enjoyed from Jeffrey Street than, for example, from North Bridge, where the height of safety barriers can impede views. However, the current placement of bins on Jeffrey Street is already having a negative impact, standing directly in front of views towards Calton Hill (Figure 86).

8.4 Conclusion

Ramsay Garden is a tight, enclosed space, typical of the Old Town where reduced space led to increasingly vertical building – although, in the case of Ramsay Garden specifically, this space was deliberately manufactured in the 1890s to mimic the medieval street pattern. Although Ramsay Garden is best-known for its outward-facing elevations with their dramatic position above Princes Street Gardens, its internal courtyard is just as carefully designed, and its sense of restriction and vertiginous construction is a key element of the development. With this in mind, there is no appropriate space within it for a bin hub.

Cockburn and Jeffrey Streets are examples of streets in the Old Town where there are already bins, but where bin hubs are proposed. As with many streets in the New Town, Cockburn Street was designed as a unified work, in this case in the Baronial style, and its long curve and steep gradient means that the street is gradually exposed as the viewer walks up or down it. Existing bins on Cockburn Street are already having a negative effect on the special interest of the Old Town conservation area. In the case of Jeffrey Street, the existing bins have been placed directly in the path of Edinburgh Key View C06, interrupting views towards Calton Hill. The importance of views in the Old Town does not appear to have been fully considered when the siting of future bin hubs has been discussed.

The sensitivity to change of the Old Town conservation area is **high**. This is based on the high concentration of Category A listed buildings, which satisfies the criterion for high sensitivity in **Table 1** of ‘conservation areas containing very important buildings’. The introduction of bin hubs is regarded as a **small change** to the heritage asset, as while key visual links within the conservation area and between the conservation area and its surroundings would be unaffected, the introduction of bin hubs, especially in their proposed numbers, would be a noticeable change. The effect is judged to be **moderate** overall. While **Table 3** allows for either a minor or moderate change to be recorded in these circumstances, we consider that the importance of the buildings within the conservation area, as well as the contribution of the conservation area to the WHS, meant that a small change to the Old Town Conservation Area would result in a moderate adverse effect.

9.0 IMPACT ASSESSMENTS: WEST END CONSERVATION AREA

9.1 Torphichen Street



Figure 87 Torphichen Street, looking east.



Figure 88 Torphichen Street, south side, looking west.



Figure 89 Torphichen Street, south side, looking east.

Torphichen Street runs east from West Maitland Street. It is characterised by a mixture of historic terraced housing and modern business accommodation. The terraces date from the various points in the nineteenth century and include works by Robert Wilson, James Haldane, and Thomas Bonnar; the latter in particular designed the graceful transitional building between Torphichen Street and Atholl Place. Haldane's work on the south side of the street includes pavilions with Tuscan pilasters. A landmark on the street is the turret of the Torphichen Street School, designed by Robert Wilson in the later nineteenth century to fit its awkward site on the corner of Canning Street. At the east end of the street, on the south side, a number of modern office buildings have been built which have a negative effect on the visual experience of Torphichen Street,

but particularly towards the junction with West Maitland Street the historic buildings have survived externally intact.

9.2 Conclusion

In comparison to the New Town and Old Town conservation areas, the West End conservation area is not so sensitive to change, as it has already been subject to considerable alteration, typically as part of schemes to regenerate former industrial areas. This has resulted in the erection of numerous modern office buildings, in evidence in Torphichen Street. However, Torphichen Street nonetheless has a high number of surviving nineteenth century terraced houses, which are part of an ensemble of streets around West Maitland Street with complex views through them. It is therefore unlikely that an appropriate space could be found in Torphichen Street to site a bin hub.

The sensitivity to change of the West End conservation area overall is judged to be **medium**. As shown in **Table 1**, ICOMOS's guidelines allow for two categories of sensitivity for Conservation Areas: high sensitivity for 'conservation areas containing very important buildings' and medium sensitivity for 'conservation areas containing buildings that make an important contribution to historic character.' The aforementioned level of change to which the West End Conservation Area has been subjected resulted in a decision to select the latter category. The introduction of bin hubs is regarded as a **small change** to the heritage asset, as while key visual links within the conservation area and between the conservation area and its surroundings would be unaffected, the introduction of bin hubs would be a noticeable change. According to **Table 3**, the effect is therefore judged to be **minor** overall.

10.0 IMPACT ASSESSMENTS: OLD AND NEW TOWNS OF EDINBURGH WORLD HERITAGE SITE

All of the above streets are within the Old and New Towns of Edinburgh World Heritage Site and the assessments above can be taken as a whole in this section.

10.1 Conclusion

The introduction of bin hubs across the world heritage site does represent a risk to the OUV of the World Heritage Site. UNESCO's synthesis of the key features of the WHS emphasises its integrity and authenticity. Regarding the former, UNESCO places particular emphasis on the Skyline Policy developed by CEC, through which Key Views in Edinburgh were identified. While the purpose of the study was to protect the integrity of the city's skyline, an examination of the Key Views and how they relate to the streets where bin hubs are proposed, as detailed above, shows that a significant number of these streets would be affected. It is clear from looking at views of the streets in question, that the introduction of bin hubs would have a negative effect on the experience of those views by introducing a visually intrusive element into the foreground: this is already clear in examples of those Key Views where there are already bins, such as on Palmerston Place (Key View C17) and Jeffrey Street (Key View C06).

Regarding the authenticity of the WHS, UNESCO's Statement of Outstanding Universal Value states that the level is high, and that 'individually the high-quality buildings of all dates have been conserved to a high standard and the layout of streets and squares maintain their intactness.' To streets which have the highest degree of integrity, examples of which include Moray Place and Great King Street, the introduction of a bin hub would be a relatively large threat to their exceptional integrity. To streets which have already undergone a degree of alteration and the introduction of modern elements, adding a bin hub would combine with those elements as a collection of relatively small changes which can nonetheless have a significant negative effect on the OUV of the WHS.

Based on ICOMOS's criteria in **Table 1**, the sensitivity to change of the WHS is **very high**. The introduction of bin hubs is regarded as a **small change**, as while key visual links within the conservation area and between the conservation area and its surroundings would be unaffected, the introduction of bin hubs, especially in their proposed numbers, would be a noticeable change to the heritage asset, the effect is judged to be **moderate** overall. While **Table 3** does allow for a small change to an asset of very high sensitivity to be judged to be either moderate or minor, we consider that the international importance of the WHS and its high level of authenticity, combined with the widespread nature of the proposed bin hubs, meant that the effect should be considered moderate in this case.

11.0 IMPACT ASSESSMENTS AND MITIGATION: SUMMARY OF EFFECTS ON HERITAGE ASSETS

Table 5 Likely significant effects on heritage asset receptors

Effect type	Heritage asset receptor	Effect before mitigation	Mitigation measures (as proposed by CEC)	Residual effect	Significant effect ?
Effects on the special character and appearance of the New Town conservation area.	New Town conservation area	Moderate adverse	Location on garden side Location within parking bays Minimum number of hubs Alterations to design	Moderate adverse	Yes
Effects on the special character and appearance of the Old Town conservation area.	Old Town conservation area	Moderate adverse	Location on garden side Location within parking bays Minimum number of hubs Alterations to design	Moderate adverse	Yes
Effects on the special character and appearance of the West End conservation area.	West End conservation area	Minor adverse	Location on garden side Location within parking bays Minimum number of hubs Alterations to design	Minor adverse	No
Effects upon the Outstanding Universal Value of the WHS.	Old and New Towns of Edinburgh World Heritage Site	Moderate adverse	Location on garden side Location within parking bays Minimum number of hubs Alterations to design	Moderate adverse	Yes

Overall, the introduction of bin hubs would have a significant effect on the New Town and Old Town conservation areas, and on the Old and New Towns of Edinburgh World Heritage Site. Although the bin hubs amount to only a small change to the heritage assets, the sensitivity of the New Town and Old Town conservation areas and the World Heritage Site is such that their installation would have a moderate adverse effect on their setting. This is particularly in recognition of the fact that it is part of a pattern of cumulative negative effects which have gradually eroded the significance of the heritage asset (for example increases to signage and use of inappropriate paving

materials). The West End conservation area is judged to have a slightly lower sensitivity, meaning that there would be a minor adverse effect there, which is not considered significant in EIA terms. The mitigation currently proposed by CEC is not judged to be effective, relying too heavily on the transitory and already negative effect of parked cars to screen the hubs and not reflecting the fact that the design of the streets is such that there is no appropriate place for a permanent installation. There would thus still be an adverse effect on the cultural-heritage significance of the assets, were the mitigations to be applied.

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