



## thecockburnassociation

Edinburgh's Civic Trust

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Emma Wilson  
Planning Officer  
City of Edinburgh Council

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Dear Emma Wilson,

**APPLICATION REFERENCE: 15/04445/FUL** Mixed use development comprising hotel, bar, restaurant, cafe, retail and commercial uses and alterations to India Buildings, 11-15 Victoria Street and Cowgatehead Church. | 1 -15 Victoria Street 18-20 Cowgate Edinburgh EH1 2EX

India Buildings, Category A listed, a 4-storey Scots Baronial and Jacobean office block, curved to street frontage. Built for James Lawson, who also built the adjoining building, Henderson also prepared plans for India Buildings, but after his death the plans were much altered and amended by David Cousin. The inscription above the principal entrance reads 'Dominus Providebit.' The British Linen Bank had premises in the main block. Victoria Street formed part of Thomas Hamilton's plan for the new Southern and Western approaches to the city and the link to the Grassmarket from the new bridge - Victoria Street. Hamilton was replaced as architect to the Commissioners to the Improvement Act in 1834. The style stipulated by the Commissioners for the new buildings associated with these developments was 'Old Flemish' a variation on Scotch Baronial, drawing heavily on detailing from Heriot's Hospital. Cousin's design is a development of this style. The site incorporates the Cowgatehead Church which is category B listed and adjacent buildings include the Category B listed Central Library and the Category A listed Magdalen Chapel.

We welcome development of this site and the re-use of the buildings. There is an opportunity to add to the unique character of the Conservation Area and World Heritage Site but it demands a high quality and sympathetic approach.

The Association has reviewed this application and objects to the proposals for the following reasons:

1. The scale of the development proposed does not acknowledge the setting within the Old Town Conservation Area and World Heritage Site and would be detrimental to the unique qualities of this protected part of the city. Any building proposed here must add to the character of the area and enhance the setting. The challenging topography with its 'multiple layers of built heritage' as noted in the WHS Management Plan, demands a layered approach to development in character with the Old Town and it must be subservient to the upper level buildings, Central Library and India Buildings. The proposals extend the height from Victoria Street into the centre of the site with harmful affect and the drama of the topography here is lost.  
DES 1, 3, 1 ENV 1, 3, 6
2. With LJ Research reporting earlier this year that 'Edinburgh (hotel) room occupancy reached 59.9% (falling 0.8% compared to last year)' we are bound to question the Council's brief for this site and others within the City Centre for more and more hotels. At the same time we are facing an affordable housing crisis and sites within the Council's control are being squandered when they could be providing vital residential opportunities to maintain communities within the city centre. Have opportunities for a mixed development been fully explored for the site? A Boutique Hotel with affordable housing and some retail? We believe a 235 bedroom hotel inappropriate for the site and the needs of the community.  
EMP 5

3. Public realm improvements would be welcomed as part of the development in partnership with the Council. Restoration of the closes which run from the Cowgate to Victoria St would increase vitality and spatial richness to the Old Town and are characteristic of the area. There are four north/south closes, Anderson Close, Pollock's Close, Allison's Close and Machonochie's Close which run or ran through the site in the past. The opportunity to provide a public route through the middle of the site should not be lost.

The current conditions in the Closes and at Cowgatehead are well below desirable standards. The developers will know from their experience at SoCo that pedestrian and vehicular access in this area is compromised. The additional congestion created by a 235 bedroom hotel will be hard to alleviate. We can envisage the pavement parking, double yellow line parking and pedestrians forced onto the roadways extending onto George IV Bridge as coaches, taxis, cars and service vehicles attempt to serve the hotel.

DES 3

4. We also draw attention to the Coalition pledges relevant to the site.
- CO7 Edinburgh draws new investment in development and regeneration.
  - CO19 Attractive Places and Well Maintained – Edinburgh remains an attractive city through the development of high quality buildings and places and the delivery of high standards and maintenance of infrastructure and public realm.
  - CO23 Well engaged and well informed – Communities and individuals are empowered and supported to improve local outcomes and foster a sense of community. Single Outcome Agreement
  - SO4 Edinburgh's communities are safer and have improved physical and social fabric.

We question whether this planning proposal meets CO19, 23 and 4.

Yours sincerely



Marion Williams  
Director