

11 February 2025

Attention: Kenny Bowes
Senior Planning Officer
City of Edinburgh Council

By email only

SLR Project No.: 405.VT3200.00001

Your Ref: 24/06261/SCR

RE: New Town Quarter, Edinburgh – Proposed Scope of EIA

Dear Kenny,

We refer to your EIA Screening Opinion received on 17th January 2025 by our client (the 'Applicant'¹) regarding the proposed New Town Quarter development at Fettes Row, Edinburgh (the 'Proposed Development').

You have concluded that EIA is required to support the Applicant's planning application for the Proposed Development. Your Screening Opinion states that your key concerns and the reasons for screening the proposals into EIA are (quoting from your Screening Opinion documents):

The proposals show a different height, form and design of development over and above that has previously been granted.

The site is in an environmentally sensitive location sitting within the New Town Conservation Area and the New Town Gardens Inventory Designed Landscape. It is also next to the World Heritage Site and in the vicinity of a number of listed buildings, primarily along Fettes Row and Royal Crescent.

There are a number of Category A listed buildings within the vicinity of the site boundary. There are also a number of other listed buildings around the site.

Information provided to date shows a differing form of development and heights with the potential for negative impacts on the aforementioned assets.

The scale and height of development has the potential to impact significantly on sensitive heritage receptors ... within the vicinity of the site and wider views.

The scale, mass and height has the potential to significantly impact on the city's heritage assets, including the outstanding universal values of the World Heritage Site.

Adopting the precautionary principle the proposed changes to the development, including the height, form and design, are likely to have a significant effect on the historic environment even in the context of the granted permissions.

It is clear that your concerns centre around two technical EIA topics: Townscape & Visual Impact, and Cultural Heritage. To that end, the Applicant accepts your Screening Opinion and intends to submit an EIA Report in support of the forthcoming planning application which will be limited to those two technical chapters only. The proposed chapter structure of the EIA Report is:

¹ Izar V Lux S.a.r.L and Fusion Edinburgh Propco Ltd

1. Introduction
2. EIA Methodology
3. Previous and Existing Land Uses and Activities
4. Alternatives and Design Evolution
5. The Proposed Development
6. Construction
7. Townscape and Visual Impact
8. Cultural Heritage
9. Cumulative Effects
10. Summary of Effects

The EIA Report will be accompanied by a Non-Technical Summary in line with the EIA Regulations².

The proposed scopes of the Cultural Heritage assessment and the Townscape and Visual Impact Assessment (TVIA) are provided in **Appendices 1 and 2** respectively. A Viewpoint Location Plan is in **Appendix 3** and a Heritage Asset Plan is in **Appendix 4**.

Both technical assessments will consider two assessment scenarios:

Assessment against current baseline conditions (i.e. the currently cleared and excavated site); and

Assessment against the consented development (i.e. the changes to the consented development that the Proposed Development will bring about).

All technical topics other than TVIA and Cultural Heritage will be 'scoped-out' of the EIA Report. This is in line with the EIA Screening Opinion which is clear that the two topics of concern to CEC are TVIA and Cultural Heritage. This also accords to a degree with our previous assertion³ that the changes to the Proposed Development that would be brought forward by the forthcoming planning application would not result in any significant adverse effects to sensitive receptors for any of the technical topics.

Nevertheless, the Applicant understands their responsibility to ensuring that all potential environmental impacts of the Proposed Development are appropriately assessed and reported. To that end, the Applicant intends to provide the following documents in support of the planning application as standalone documents, separate from the EIA Report:

- Noise Impact Assessment
- Arboricultural Impact Assessment and Tree Survey
- Daylight, Sunlight and Overshadowing Assessment
- Flood Risk Assessment and Drainage Strategy (including Surface Water Management Checklist)
- Preliminary Ecological Survey
- Biodiversity Strategy
- Preliminary Site Investigation
- Affordable Housing Statement

² The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended)

³ Request for EIA Screening Opinion, 12th December 2024



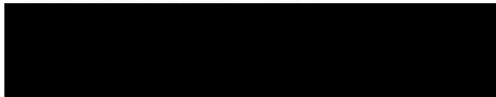
- Planning Statement including Affordable Housing Statement, and Statement of Community Benefit
- Student Need and Demand Assessment
- Pre-Application Consultation Report
- Socio Economic Impact Assessment
- Sustainability Statement and S1 Form
- Transport Statement

The Applicant has commenced work on the EIA Report. This letter is to inform CEC of the Applicant's proposed scope of the EIA. In the interests of overall project timescales, it is not a request for a formal EIA Scoping Opinion although we would welcome CEC's feedback on the proposed scope that we have set out above.

Kind regards,



Gavin Spowage
Technical Director – EIA



- Encs Appendix 1: Cultural Heritage Scope and Methodology
 Appendix 2: Townscape and Visual Scope and Methodology
 Appendix 3: Viewpoint Location Plan
 Appendix 4: Heritage Asset Plan



Appendix 1: Cultural Heritage Scope and Methodology



Cultural Heritage

1. The cultural heritage assessment will be accompanied by a Heritage Statement (incorporated as an appendix to the chapter). The Heritage Statement will provide detailed description of the built heritage baseline (including World Heritage Site (WHS), Listed Buildings, and Conservation Area), including description of the assets and their heritage value, including their settings. The information contained within the Heritage Statement will be used to inform the ES Chapter.
2. The cultural heritage assessment (specifically impacts on the setting of heritage assets) will be informed by viewpoints and views prepared as part of the Townscape and Visual Impact Assessment. The viewpoint locations to inform both the cultural heritage and townscape and visual chapters of the ES and the Heritage Statement will be as per those agreed for inclusion in the ES for the previously consented application at the Site. The locations of the proposed viewpoints are shown on the plan in Appendix 3.

Potential Effects

Demolition and Construction Effects

3. There are no listed buildings or scheduled monuments within the Site. All buildings which previously occupied the Site have been demolished.
4. A programme of archaeological evaluation in the form of trial trenching was carried out by CFA Archaeology in 2019 (Musgrave and Kirby 2019) and confirmed the low potential for significant archaeological remains on the Site. Further archaeological mitigation in the form of an archaeological watching brief and excavation was carried out by CFA Archaeology in 2022 (McNicol 2022). As such, any potential for demolition and construction effects upon buried archaeological remains within the Site have already been mitigated and these therefore do not require consideration within the ES.

Operational Effects

5. The significance / heritage value of proximate heritage assets which may be significantly affected by the development due to its impact on their setting, and which will be included in the assessment are listed below. The locations of these assets are shown on the plan in Appendix 4. The assets to be included are as per the scope agreed for inclusion in the EIA for the previously consented application at the Site.
 - 1-13a Royal Crescent/24 and 24a Dundonald Street and 26-28 Scotland Street including railings and lamps (Category A Listed Building LB29679) & 15-23a Royal Crescent and 15 Dundonald Street including railings and lamps (Category A Listed Building LB29680)
 - 1-12 Fettes Row, and 99-103 (Odd Nos) Dundas Street, including railings and lamps with 13 North East Cumberland Street Lane including wall (Category B Listed Building LB28754)
 - 78-86a (Even Nos) Dundas Street, and 36a Cumberland Street, including railings (Category A Listed Building LB28721)
 - Old and New Towns of Edinburgh World Heritage Site
 - New Town Conservation Area
 - New Town Gardens Inventory Garden and Designed Landscape (GDL00367)

Approach and Methodology

Legislation, Policy and Guidance

6. The assessment will be informed by relevant cultural heritage legislation, policy and guidance documents including the following key documents:
 - The Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997
 - National Planning Framework 4 (NPF4) (Scottish Government, October 2024)
 - Historic Environment Policy for Scotland (HEPS) (Historic Environment Scotland, 2019)
 - Historic Environment Scotland Managing Change Guidance including: - Setting - World Heritage - Interim Guidance on the Designation of Conservation Areas and Conservation Area Consent
 - City Plan 2030 (City of Edinburgh Council, November 2024)
 - New Town Conservation Area Character Appraisal (City of Edinburgh Council, 2017)
 - Old and New Towns of Edinburgh World Heritage Site Management Plan 2017-2022
 - Convention Concerning the Protection of the World Heritage Cultural and Natural Heritage (UNESCO 1972)
 - Principles of Cultural Heritage Impact Assessment (IHBC, ClfA & IEMA 2021)
 - World Heritage Resource Manual. Guidance and Toolkit for Impact Assessments in a World Heritage Context (the 'UNESCO Guidance') (UNESCO 2022)
 - Operational Guidelines for the Implementation of the World Heritage Convention (the 'Operational Guidelines') (UNESCO 2023)
 - Guidance and Toolkit for Impact Assessments in a World Heritage Context (UNESCO 2022)
 - Design Manual for Roads and Bridges (DMRB), LA 104 Environmental assessment and monitoring (Standards for Highways 2020) and LA 106 – Cultural Heritage Assessment (Standards for Highways Jan 2020)

Consultation

7. The programme of consultation with statutory authorities which was carried out as part of the pre-application process for the previous consented development at the Site has informed the proposed scope for the cultural heritage chapter of the ES. Key consultees in relation to cultural heritage matters were City of Edinburgh Council, Historic Environment Scotland and Edinburgh World Heritage.

Assessment Methodology

8. The assessment will be prepared in accordance with the same assessment methodology as agreed for assessment of the previously consented application for the Site. This methodology is set out below¹.
9. The preparation of the cultural heritage assessment will be informed by a Heritage Statement report which will be included as an Appendix to the ES Chapter. The Heritage Statement will set out in detail the baseline description of the Site, including identification and description of cultural heritage assets in the vicinity and their heritage value and the contribution made by setting. It will assess the impacts of the proposed development to address the requirements of local and national planning policy. This information as presented in the Heritage Statement will help to inform the preparation of the ES Chapter.

Classification of Effects

10. The effects of the proposed Development will be assessed under the following headings:
 - Construction effects
 - Operational effects
 - Cumulative effects
11. The nature of effects will be categorised as either:
 - Temporary and reversible
 - Permanent and irreversible

Heritage Value

12. The baseline section of the ES chapter will describe the heritage value of each asset, informed by the more detailed assessment of significance as set out in the Heritage Statement. The heritage value of each asset will be derived from the relative importance of the asset and the relative importance that legislation and policy attach to it.
13. Table 10 summarises the relative sensitivity of those historic environment assets that are relevant in the context of the proposed Development.

¹ There is no established methodology for assessment of impacts on heritage assets for the purpose of EIA set out in legislation, policy or guidance. This methodology has been prepared with reference to a number of guidance documents, including DMRB LA 104 Environmental assessment and monitoring (Standards for Highways 2020) and LA 106 – Cultural Heritage Assessment (Standards for Highways Jan 2020). It also takes account of the guidance set out in the now superseded Guidance on Heritage Impact Assessments for Cultural World Heritage Properties. (ICOMOS, January 2011). The 2011 ICOMOS guidance has been superseded by Guidance and Toolkit for Impact Assessments in a World Heritage Context (UNESCO 2022). This new guidance is specific to WHSs and does not set out a methodology for assessing effects on the value of heritage assets which could be applied for the purposes of EIA assessment. Accordingly, the previous 2011 ICOMOS guidance has been deferred to.

Table 1: Heritage Value

Heritage Value	Definition / Criteria
Very High	Assets of acknowledged international importance including: <ul style="list-style-type: none"> Inscribed World Heritage Sites
High	Assets of national importance including: <ul style="list-style-type: none"> Category A Listed Buildings, or other buildings that can be shown to have exceptional qualities in their fabric or historical associations which is not adequately reflected in their listing grade. Conservation Areas containing very important buildings Well preserved historic landscapes or townscapes, exhibiting considerable coherence, time-depth or other critical factors
Medium	Assets of regional importance including: <ul style="list-style-type: none"> Category B Listed Buildings, or other buildings that can be shown to have considerable qualities in their fabric or historical associations and are of regional or more than local importance Conservation Areas which contain buildings that contribute significantly to its historic character
Low	Assets of local importance including: <ul style="list-style-type: none"> Category C Listed buildings or other buildings of modest quality in their fabric or historical associations Historic townscape of limited historic integrity in terms of their buildings or built settings.
Negligible	Other assets of local importance, including: <ul style="list-style-type: none"> Unlisted buildings or built up areas of no architectural or historic merit, or whose value is limited by poor preservation.

Assessment of Impacts

In order to assess the impact of change resulting from the Development upon each heritage asset, or group of heritage assets, the following categories will be used:

Table 2: Magnitude of impact²

Magnitude of Impact	Description
High beneficial	The proposed changes will substantially improve the overall setting and character of the heritage asset, revealing and/or enhancing important characteristics that were previously unknown or inaccessible. There would be a substantial improvement to important elements of the asset.
Medium beneficial	The proposed changes will considerably improve the setting or overall character of the heritage asset. There may be an improvement in key uses and beneficial change (e.g. the creation of coherency) to the characteristics of the asset.
Low beneficial	The proposed changes will result in a minor improvement to the setting or overall character of a historic asset
Negligible	The proposed changes will have a very slight or minimal positive or negative impact on the heritage asset or its setting which is barely distinguishable
No change	The proposed changes will have no impact on the historic asset or its setting
Low adverse	The proposed changes will cause a slight change to an asset or its setting, causing minor alteration.
Medium adverse	The proposed changes will negatively alter many key elements of an asset or its setting, causing considerable change and noticeably detracting from its heritage value.
High adverse	The proposed changes will fundamentally change the physical condition or overall setting and/or character of historic assets, causing considerable disruption to, or in some cases, complete destruction of, important features.

14. The heritage value of the asset (Table 1) and the magnitude of impact (Table 2) will be combined to assess the overall significance of the effect on each cultural heritage asset or group of heritage assets, using the matrix presented below (Table 3). The use of this matrix enables a transparent and objective assessment to be made.

² These definitions of magnitude of impact have been derived from the ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties. (ICOMOS, January 2011) which has been superseded by Guidance and Toolkit for Impact Assessments in a World Heritage Context (UNESCO 2022). This new guidance is specific to WHSs and does not set out a methodology for assessing effects on the value of heritage assets which could be applied for the purposes of EIA assessment. Accordingly, the previous 2011 ICOMOS guidance has been deferred to.

Table 3: Significance of Effect

		Heritage Value				
		Very High	High	Medium	Low	Negligible
Magnitude of Impact	High Beneficial	Major	Major	Major/Moderate	Moderate /Minor	Minor
	Medium Beneficial	Major / Moderate	Major / Moderate	Moderate	Minor	Minor / Negligible
	Low Beneficial	Moderate / Minor	Moderate / Minor	Minor	Minor / Negligible	Minor / Negligible
	Negligible	Minor	Minor	Minor / Negligible	Minor / Negligible	Minor / Negligible
	No change	Neutral	Neutral	Neutral	Neutral	Neutral
	Low adverse	Moderate / Minor	Moderate / Minor	Minor	Minor / Negligible	Minor / Negligible
	Medium adverse	Major / Moderate	Major / Moderate	Moderate	Minor	Minor / Negligible
	High adverse	Major	Major	Major / Moderate	Moderate / Minor	Minor

15. Cultural heritage assets can be affected by a broad range of factors invoking change, these may be physical changes or changes to their setting. The range of effects in relation to change of cultural heritage assets, and at which point they may be considered to be significant, does not fit the strict outcome of the binary assessment presented in the matrix above. However, for guidance, overall effects determined to be moderate / minor or below are likely to be not significant, all other effects above moderate may be significant depending on the type of change and factors involved. Whether an effect is significant or not significant is a matter of professional judgement.

Cumulative Impacts

16. The assessment of cumulative effects on heritage assets will consider the effects of the proposed development upon the significance / heritage value of heritage assets, in addition to the likely effects of other consented or approved developments. The approved development at 108, 114-116 Dundas Street (Planning application ref 22/05886) would be included within this assessment.

Mitigation

17. The previously approved development for the Site was designed through an iterative process which allowed identification and mitigation of potential impacts on heritage assets throughout the design process. The new amended proposals are also being designed through a similar iterative process. Mitigation through design therefore comprises the primary measure to mitigate impacts upon cultural heritage assets. The assessment will describe any additional measures which can be adopted to prevent/ reduce or offset significant impacts and will then assess the residual effects taking into account the likely effectiveness of the proposed mitigation.

Appendix 2: Townscape and Visual Scope and Methodology



Townscape and Visual Impact

Potential Effects

1. The Proposed Development has the potential to alter the existing townscape character and quality, and to change views to, through and from the Site.
2. It is considered that the Proposed Development has the potential to have significant effects on surrounding visual receptors and local townscape character area receptors. Table 1 sets out details of the potentially significant effects which have been identified and will be assessed within the ES chapter. This scope is as per the scope agreed for inclusion in the EIA for the previously consented application at the Site, and agreed with consultees as part of that previous application.

Table 1: Potentially Significant Effects

Effect	Receptor	Applicable Development Phase (Construction and/or Operational)
Changes to local townscape character	<p>Local Townscape Character Areas:</p> <ul style="list-style-type: none"> • TCA1 – Second (Northern) New Town – including streets within character area (relative to Site) – Dundas Street, Fettes Row, Royal Crescent, Scotland Street, Dundonald Street • TCA2 – Canonmills and Claremont <ul style="list-style-type: none"> – Sub area - TCA2A – Former Canonmills Haugh – including streets within sub - character area (relative to Site) – Dundas Street, Eyre Terrace – Sub area - TCA2B – Canonmills – Speculative Georgian and Victorian development – including streets within subcharacter area (relative to Site) – Brandon Street, Eyre Place, Eyre Crescent, Henderson Row 	Operational
Changes to the character and amenity of views	<p>Visual Receptors:</p> <ul style="list-style-type: none"> • Public Open Space users - Botanic gardens • Public Open Space users - Calton Hill • Public Open Space users - King George V Park • Motorists and Pedestrians – Dundas Street 	Operational

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- Motorists and Pedestrians – Royal Crescent
 - Motorists and Pedestrians – Eyre Place
 - Motorists and Pedestrians – Secondary roads to the north of the Site
 - Motorists and Pedestrians – Secondary roads to the east of the Site
 - Motorists and Pedestrians – Secondary roads to the west of the Site
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Changes to the character and amenity of views	Representative Views (RV):	Operational
	<ul style="list-style-type: none"> • RV 1 – Dundas Street sequence – orientated north • RV 2 – Botanic Garden – orientated south east • RV 3 – Fettes Row Leading to Royal Crescent • RV 4 – Calton Hill, from Old Observatory House – orientated north west • RV 5 – King George V Park, entrance from Logan Street – orientated south west • RV 6 – Ferry Road, close to Inverleith St Serf’s Church – orientated south • RV 7 – Brandon Street – orientated south • RV 8 – Dundonald Street – orientated north • RV 9 – Summer Bank – orientated west • RV 10 – Fettes Row – orientated east • RV 11 – Eyre Place – orientated south west • RV 12 – Henderson Row – orientated east • RV13 Castle Ramparts – orientated northwest • RV14 Salisbury Crags, Radical Road – orientated north west • RV15 –View from the junction of Eyre Place and Eyre Terrace, looking south along Eyre Terrace 	

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- RV16 - View from within King George V Park, in front of the play areas, looking upwards towards the New Town.
 - RV17 - View from Cornwallis Place at the corner where it becomes Summer Bank, looking over the park towards the Site
 - RV18 – View from the junction of Dundonald Street and Royal Crescent, looking west along Royal Crescent (towards Fettes Row)
 - RV19 – View from Fettes Row – orientated in an easterly direction
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3. Visualisations of the Proposed Development will be prepared for all of the above RVs. These will be used to inform the assessment of effects on the identified townscape and visual receptors within the Townscape and Visual Impact Assessment (TVIA) which will form an appendix to the ES chapter on townscape and visual effects. The assessment of effects for those receptors with significant effects will be presented in the ES chapter on Townscape and Visual effects
4. As agreed in the scoping opinion in relation to the previously consented development at the Site, effects upon the following assets have been scoped out, and will not be considered in the EIA
 - Potential impact of the proposed Development on townscape character and views from areas of townscape and public open space beyond the maximum one-kilometre study area¹. This includes Edinburgh Castle ramparts; Salisbury Crags; Inverleith Park; and Arthur's Seat.
 - Private views from residential properties surrounding the Site. In most townscape and visual assessments, unless specifically requested by the LPA, visual receptors are restricted to groups of people in publicly accessible places. Views from private residential properties will not be included in the assessment as changes to private views are not a planning consideration unless the development is likely to be so overbearing or dominating that they could result in unacceptable living conditions. Where this is possible, a separate residential visual amenity assessment is undertaken. In this case, due to the existing development already being present in views from properties adjoining the Site and the retention of a reasonable separation between the Proposed Development and the existing residential properties, it is recommended that impacts on views from private residential properties are not required.
 - Potential Townscape and Visual Effects during construction. The assessment of townscape and visual effects will consider the likely significant effects during operation only. This is due to the temporary nature of construction effects and professional experience and judgement which has established that the effect on the townscape character and visual amenity during construction would be similar in magnitude to those changes experienced

during the operational phase. It is not expected that effects during the construction phase would be any greater than those when the proposed Development is complete; the assessment of operational effects within the EIA Report chapter would therefore represent a worst-case scenario for construction phase effects and these will not be considered further within the chapter

Approach and Methodology

5. The methodology for townscape and visual assessment is based on current best practice as set out in:
 - Landscape Institute and Institute for Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Assessment Third Edition
 - Landscape Institute (2017) Landscape Character Assessment: Technical Guidance Note 05/2017
 - Landscape Institute (2017) Townscape Character Assessment: Landscape Institute Technical Information Note 05/2017 (updated April 2018)
 - Landscape Institute (2019) Visual representation of development proposals (Landscape Institute Technical Information Note 06/2019)
6. The Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) states that this type of assessment provides a tool for identifying and assessing “the effects of change resulting from development on both the landscape as an environmental resource in its own right and on people’s views and visual amenity” (Para. 1.1). It goes on to emphasise that the appraisal has two interlinked elements of: landscape, as a resource; and visual amenity, including views. The effects of both must be addressed in the assessment.
7. The definition of landscape in the European Landscape Convention, which the UK has signed and ratified, includes villages and towns and cities and the GLVIA states that ‘townscape’ refers to areas where the built environment is dominant. It goes on to state that townscape includes the buildings and the different types of urban spaces, and the relationship between the two.
8. In carrying out the townscape and visual assessment, the baseline conditions of the existing townscape character and visual receptors of the Site and the surrounding area will be established. The Proposed Development is then considered, along with an assessment of the ‘sensitivity’ of the identified townscape receptor, visual receptor or representative view. This is determined by establishing the ‘value’ of the townscape or view and ‘susceptibility to change’ of the receptor in relation to the proposed Development. From this, the potential magnitude of ‘effect’ on the first day of operation of the proposed Development is predicated and assessed. The likely significant effects on the townscape and visual receptors, as a result of the Proposed Development, will then be identified and presented within the chapter of the ES.
9. The visual assessment will be supported by an assessment of representative views set out in an A3 appendix to assist with the interpretation of the effects in visual receptors. This will incorporate existing photography of each view. For key views as agreed with officers at CEC, Accurate Visual Representations (AVRs) will be provided illustrating the Proposed Development and any other scoped-in cumulative schemes which are also visible. The approved development

at 108, 114-116 Dundas Street (Planning application ref 22/05886) would be included within this assessment.

10. The assessment will be undertaken with reference to the following relevant legislation, policy and guidance:
 - European Landscape Convention (European Council, 2007)
 - National Planning Framework 4 (NPF4) (Scottish Government, October 2024)
 - Old and New Towns of Edinburgh, World Heritage Site, Management Plan 2017-2022
 - City Plan 2030 (City of Edinburgh Council, November 2024)
 - Edinburgh Design Guidance (City of Edinburgh Council, January 2020)
 - New Town Conservation Area Character Appraisal (City of Edinburgh Council, 2017)

Study Area

11. A study area of 1km radius from the centre of the Site will be used for the assessment. This study area is as per that agreed for the EIA for the previously consented application at the Site, and agreed with consultees as part of that previous application. The size of this study area was determined through desk study and field study, the full details of which will be described in the ES Chapter.

Consultation

12. The programme of consultation with planning officers undertaken as part of the pre-application process for the previous consented development at the Site has informed the proposed scope for the Townscape and Visual chapter of the ES. This included the agreement of representative viewpoint locations and visualisation types. The viewpoint locations are shown on the plan in Appendix 3.

Assessment Methodology

13. The assessment will be prepared in accordance with the same assessment methodology as agreed with CEC for assessment of the previously consented application for the Site. This methodology is set out below
14. A detailed baseline landscape/townscape appraisal will be undertaken to supplement the baseline appraisal work undertaken already to inform this scoping chapter. This will include a mixture of desk study and field work to identify and record the key townscape features and character of the townscape within the study area. An analysis of the townscape character context of the Site will be undertaken which will reference the current published townscape character studies relating to the study area at a national and city level. This will be followed by fieldwork to assess the key characteristics of the two local townscape character areas within the study area. The key townscape receptors (townscape character areas, townscape features or townscape characteristics) with potential to be affected by the Proposed Development will then be identified and a judgement made on the Value of each of these. This judgement will be made based on the approach set out in GLVIA3 and as described below.

15. The Value of each of the identified townscape receptors will then be assessed with reference to the following criteria and the definitions of level of value set out in Table 2:

- Any designations or policies (both national and local) which may be present; and
- The presence or absence of other attributes which contribute to townscape value such as condition, scenic quality, rarity, representativeness, conservation interests, recreation value, perceptual aspects or associations e.g. with writers, artists or historic events

Table 2: Value of Townscape Receptors

Value	Typical Level of Designation / Rarity	Typical Examples
Very High	International, National	World Heritage Sites, and/or key features of World Heritage Sites. No potential for substitution
High	National, Regional	Scheduled Monuments, some Conservation Areas, and townscape areas with typically a significant number of Category A/B listed buildings, and/or Gardens and designated landscapes. No or limited potential for substitution.
Medium	Regional, Local	Townscape areas designated at local level e.g. some Conservation Areas and other undesignated areas or features of notable townscape quality or recreational/tourist interest with value perhaps expressed through nonofficial publications or demonstrable use. Limited potential for substitution
Low / Ordinary	Local	Townscape features or character areas which are not related to designated, or non-designated heritage assets, or a planning designation; and/or mentioned in guidebooks or on tourist maps; and/or referenced in art and literature; and/or is of little scenic or townscape importance. Considerable potential for substitution
Very Low	Local	Townscape features or local character areas in poor condition or quality and/or identified for recovery.

Baseline Visual Appraisal Methodology

16. The baseline visual appraisal established the area in which the Site, and emerging Proposed Development, may be visible; the different groups of people who may experience the views of the Proposed Development (defined as visual receptors); and, the nature of these views. These factors interrelate, but for the purpose of the assessment are dealt with in that order.
17. Following identification of the key visual receptors, representative views were identified to reflect typical views from the key visual receptors. A description and evaluation of the identified views will be undertaken which will take into account the following:

- type and relative numbers of people, and their occupation or activity
- location, nature, composition and characteristics of the views (including directions)
- elements which may interrupt, filter or otherwise influence the views
- seasonal changes in the view

Method of Assessing Significance

Assessment of Townscape Effects

18. Townscape effects include:

- Changes to, and/or complete or partial loss of features, elements, characteristics or perceptual aspects that contribute to the character and distinctiveness of the townscape/local townscape area; and/or,
- Introduction of new elements or features that influence the character and distinctiveness of the townscape/local townscape area;

19. The assessment of townscape effects will consider the sensitivity of the townscape receptor and the magnitude of the predicted effect. Significance will then be concluded as major, moderate, minor or negligible, with significant effects determined through professional judgement.

Sensitivity of Townscape Receptors

20. The sensitivity of townscape receptors relates to the value attached to that receptor (which is established as part of the baseline assessment) and the susceptibility of the receptor to the type of change or development proposed. GLVIA3 defines susceptibility as “the ability of the landscape receptor (whether it be the overall character or quality/condition of a particular landscape type or area, or an individual element and/or feature, or a particular aesthetic and perceptual aspect) to accommodate the Proposed Development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies”.

21. Judgements on the susceptibility to change of each of the identified townscape receptors will then be made based on the scale set out in Table 3.

Table 3: Susceptibility to Change of Townscape Receptors

Susceptibility to change	Description
High	Townscape receptor would be unlikely to accommodate the type of development proposed without undue negative consequences for the maintenance of the baseline townscape character and/or the achievement of townscape planning policies and strategies. Townscape receptor has little or no relationship to the type of development proposed and/or would be difficult to replace or substitute if lost e.g. ancient woodland, veteran trees and historic parkland. Characteristics of the townscape which contribute to the townscape character are highly sensitive and would be fundamentally altered by the type of development proposed.
Medium	Townscape receptor would be compromised by the type of development proposed and/or the achievement of townscape planning policies and strategies would be compromised. Townscape receptor has some relationship to the type of development proposed and/or could be partially replaced or substituted if lost. Townscape receptor is moderately sensitive and characteristics of the receptor would be altered by the type of development proposed. The general townscape character would remain but would be weakened by the type of development proposed.
Low	Townscape receptor would be likely to accommodate the type of development proposed without undue negative consequences for the maintenance of the baseline townscape character and/or the achievement of townscape planning policies and strategies. Townscape receptor has a close relationship to the type of development proposed and could be easily replaced or substituted if lost. Townscape receptor is of low sensitivity and characteristics of the townscape would not be significantly altered by the type of development proposed. The general townscape character is resilient to change.

22. A judgement on the overall sensitivity of each townscape receptor (ranging from Very High to Very Low) will be made based on the combined evaluation of susceptibility and value attached to the receptor together with informed professional judgement and guidance provided in GLVIA3.

Magnitude of Effect on Townscape Receptors

23. The magnitude of townscape effect will consider the size or scale of the effect, the geographical extent of the effect and the duration and reversibility of the effect. Judgements on the magnitude of townscape effect will be broadly based on the descriptions of magnitude set out in Table 4.
24. Consideration will also be given to the Type of Effect in terms of whether it is Adverse, Beneficial or Neutral. Often, effects will include a combination of both beneficial and adverse effects. However, a judgement will be made on the nature of the overall effect which is based on the following terms:

- Adverse: overall harm to townscape character/feature
- Beneficial: overall improvement to townscape character/feature
- Neutral: no overall harm or improvement to townscape character/feature

Table 4: Defining Magnitude of Effect - Townscape Receptors

Magnitude of Effect	Definition
High	Permanent loss of all or most of the key characteristics of a townscape receptor and/or addition of major new elements which would be dominant features with little or no relationship to the townscape receptor. Changes would substantially alter the character of a large area.
Medium	Permanent partial loss or change to some of the key characteristics of a townscape receptor and/or addition of new elements which would be prominent features. Changes would result in a large change to the character of a small area or a noticeable change to a larger area.
Low	Permanent limited/localised loss or change to common characteristics of a townscape receptor and/or addition of new elements which would be noticeable features but largely in keeping with the existing character. Changes would result in a small change to the character of a large area or a noticeable change to a small area. Also includes temporary and/or reversible changes of larger scale or extent.
Very Low	Small scale changes to common characteristics of a townscape receptor and/or small-scale additions of new elements which are in keeping with the existing character. Changes would not noticeably alter the character of the area. Also includes temporary and/or reversible changes of small or medium scale and extent.
Negligible /None	No, or barely discernible, change to townscape receptor

Assessment of Visual Effects

25. Visual effects include:

- changes to, and/or complete or partial loss of features, elements, characteristics or perceptual aspects that contribute to the character and distinctiveness of the view; and/or,
- Introduction of new elements or features that influence the character and distinctiveness of the view;

26. The assessment of visual effects will consider the sensitivity of the visual receptor and the magnitude of the predicted effect. Significance will then be concluded as major, moderate, minor or negligible, with significant effects determined through professional judgement.

Sensitivity of Visual Receptors

27. The sensitivity of the visual receptor relates to the value attached to that receptor (which is established as part of the baseline assessment) and the susceptibility of the receptor to the type of change or development proposed. A judgement on the value attached to the views will be made with reference to the following criteria and the definitions of value set out in Table 5.

- Planning designations e.g. Designated Views or Protected Vistas identified in local or regional planning policy;
- Other designations relating to landscape/townscape features or heritage assets e.g. key views identified in conservation area appraisals or recorded in citations for listed buildings or Gardens and Designated Landscapes; and
- Indicators of the value attached to views by visitors e.g. views identified in guidebooks or on tourist maps, official viewpoints (often with sign boards and interpretive material) or views referenced in literature or art.

Table 5: Value attached to views

Value	Typical level of designation / Rarity	Typical Examples
Very High	International, National	Views associated with sites of international importance e.g. World Heritage sites
High	National, Regional	Designated views of national or regional importance e.g. views of noted importance to sites of national importance e.g. Scheduled Monuments, AONBs, Category A/B listed buildings, and/or Gardens and Designated Landscapes.
Medium	Regional, Local	Views identified or protected at local level e.g. identified in local planning policy or guidance and views associated with heritage or townscape features of regional or local importance e.g. some Conservation Areas and Category B/C listed buildings. May also include views which are undesignated but value perhaps expressed through non-official publications or its contribution to enjoyment of a designated or non designated heritage asset.
Low / Ordinary	Local	The view from the identified visual receptor is not related to designated, or non-designated, heritage assets, or a planning designation; and/or mentioned in guidebooks or on tourist maps; and/or referenced in art and literature; but contributes positively to the general visual amenity experienced by the receptor.
Very Low	Local	The view from the identified visual receptor does not make a positive contribution to local visual amenity.

28. The assessment of susceptibility of visual receptors will be based on the approach set out in para 6.32 of GLVIA3 which notes that:

- 'the susceptibility of different visual receptors to changes in views and visual amenity is mainly a function of:
 - The occupation or activity of people experiencing the view at particular locations: and,
 - The extent to which their attention or interest may therefore be focussed on the views and the visual amenity they experience at particular locations'.

29. Judgements on the susceptibility of a visual receptor to change will be broadly based on the descriptions of susceptibility set out in Table 6.

Table 6: Susceptibility to Change of Visual Receptors

Susceptibility to change	Description
High	Receptors for whom the view and visual amenity is of high importance to the experience or activity including: people engaged in outdoor recreation whose attention or interest is likely to be focused on the landscape and on particular views e.g. waymarked walks through the landscape; and visitors to heritage assets or other attractions where views of the surroundings are an important contributor to the experience.
Medium	Receptors for whom the view and visual amenity is of moderate importance to the experience or activity including: Travellers on most road or rail routes
Low	Receptors for whom the view and visual amenity is of low importance to the experience or activity including: people engaged in outdoor sport or recreation which does not involve or depend upon appreciation of views of the landscape; and, people at their place of work whose attention may be focussed on their work, not on their surroundings, and where the setting is not important to the quality of working life.

30. A judgement on the overall sensitivity of each visual receptor (ranging from Very High to Very Low) will be made based on the combined evaluation of susceptibility and value attached to the receptor, together with informed professional judgement and guidance provided in GLVIA3.

Magnitude of Effect on Visual receptors

31. The magnitude of visual effect will consider the size or scale of the effect, the geographical extent of the effect, and the duration and reversibility of the effect. Judgements on the magnitude of visual effect will be broadly based on the descriptions of magnitude set out in Table 7.

32. Consideration will also be given to the Type of Effect in terms of whether it is Adverse, Beneficial or Neutral. Often, effects will include a combination of both beneficial and adverse effects. However, a judgement will be made on the nature of the overall effect which is based on the following terms:

- Adverse: overall harm to the character/quality of the view and loss of visual amenity
- Beneficial: overall improvement to the character/quality of the view and improvement of visual amenity
- Neutral: no overall harm or improvement to the view or visual amenity

Table 7: Defining Magnitude of Effect - Visual Receptors

Magnitude of Effect	Definition
High	Permanent loss of all or most of the key characteristics of a view and/or addition of major new elements which would be dominant features. Changes would substantially alter the character of the view
Medium	Permanent partial loss or change to some of the key characteristics of the view and/or addition of new elements which would be prominent features. Changes would result in a large change to the character of a small part of the view or a noticeable change to a larger part of the view.
Low	Permanent limited/localised loss or change to a view and/or addition of new elements which would be noticeable features but largely in keeping with the existing character of the view. Changes would result in a small change to the character of a large part of the view or a noticeable change to a small part of the view. Also includes temporary and/or reversible changes of larger scale or extent within the view.
Very Low	Small scale changes to common characteristics and/or small scale additions of new elements to the view. Changes would not noticeably alter the character of the view. Also includes temporary and/or reversible changes of small or medium scale and extent.
Negligible / None	No, or barely discernible, change to the view.

Duration of Effect

33. The assessment of townscape and visual effects will consider the likely significant effects during operation only. It is considered that these would all be permanent effects. The influence of the construction phase on townscape character and visual amenity will be briefly summarised within the ES chapter but temporary construction effects will not be assessed separately.
34. This is due to the temporary nature of construction effects and professional experience and judgement which has established that the effect on the townscape character and visual amenity during construction would be similar to those changes experienced during the operational phase. It is not expected that effects during the construction phase would be any greater than those when the Proposed Development is complete; the assessment of operational effects within this ES chapter would therefore represent a worst case scenario for construction phase effects.
35. The assessment of operation phase effects will consider the Proposed Development at year 1. Commentary will also be provided on how these predicted effects may change following the establishment of any proposed mitigation measures incorporated in the landscape strategy (where relevant).

Significance of Effect

36. The overall significance of townscape and visual effects will be determined by combining the assessment of sensitivity for each receptor with the assessment of predicted magnitude of change for each receptor. This assessment will be based on professional judgement but broadly follows the matrix set out in Table 8.

Table 8: Matrix for assessing significance of effect

		Sensitivity				
		Very High	High	Medium	Low	Very Low
Magnitude	High	Major	Major	Major-Moderate	Minor – Moderate	Minor
	Medium	Major	Major – Moderate	Moderate	Minor	Negligible
	Low	Moderate	Minor – Moderate	Minor	Minor	Negligible
	Very Low	Minor	Minor	Minor	Negligible	Negligible
	Negligible / None	Negligible	Negligible	Negligible	Negligible	Negligible

Note: Bold text demotes ‘significant’ effects

37. A description of the typical meaning of each category of significance is summarised in Table 9.

Table 9: Description of significance

Significance of effect	Description
Major adverse	The Development would have a major detrimental effect on the identified townscape or visual receptor. It is likely to be a large scale permanent change affecting a receptor of high or very high sensitivity or a medium scale permanent change affecting a receptor of very high sensitivity
Moderate adverse	The Development would have a moderate detrimental effect on the identified townscape or visual receptor. It includes permanent medium scale changes to receptors of medium sensitivity, permanent large scale changes to receptors of lower sensitivity and permanent smaller scale changes to receptors of very high sensitivity.
Minor adverse	The Development would have a slight detrimental effect on the identified townscape or visual receptor. It includes permanent larger scale changes to receptors of lower sensitivity and smaller scale

	changes to receptors of moderate and higher sensitivity. It also includes temporary effects of larger scale changes to receptors of higher sensitivity.
Major Neutral	The Development would have a major effect on the identified townscape or visual receptor, but the effect neither contributes to nor detracts from the identified townscape or visual receptor. The effect may comprise both detrimental and beneficial effects and/or integrate with the existing character of the identified townscape or visual receptor. It is likely to be a large scale permanent change affecting a receptor of high or very high sensitivity or a medium scale permanent change affecting a receptor of very high sensitivity
Moderate Neutral	The Development would have a moderate effect on the identified townscape or visual receptor, but the effect neither contributes to nor detracts from the identified townscape or visual receptor. The effect may comprise both detrimental and beneficial effects and/or integrate with the existing character of the identified townscape or visual receptor. It includes permanent medium scale changes to receptors of medium sensitivity, permanent large scale changes to receptors of lower sensitivity and permanent smaller scale changes to receptors of very high sensitivity.
Minor Neutral	The Development would have a slight effect on the identified townscape or visual receptor, but the effect neither contributes to nor detracts from the identified townscape or visual receptor. The effect may comprise both detrimental and beneficial effects or integrates with the existing character of the identified townscape or visual receptor. It includes permanent larger scale changes to receptors of lower sensitivity and smaller scale changes to receptors of moderate and higher sensitivity. It also includes temporary effects of larger scale changes to receptors of higher sensitivity.
Negligible Neutral / None	The Development would result in no, or barely discernible, change to the identified townscape or visual receptor.
Minor beneficial	The Development would have a slight beneficial effect on the identified townscape or visual receptor. It includes permanent larger scale changes to receptors of lower sensitivity and smaller scale changes to receptors of moderate and higher sensitivity.
Moderate beneficial	The Development would have a moderate beneficial effect on the identified townscape or visual receptor. It includes permanent medium scale changes to receptors of medium sensitivity, permanent large scale changes to receptors of lower sensitivity and permanent smaller scale changes to receptors of very high sensitivity.
Major beneficial	The Development would have a major beneficial effect on the identified townscape or visual receptor. It is likely to be a large scale permanent change affecting a receptor of high or very high sensitivity or a medium scale permanent change affecting a receptor of very high sensitivity.

Study Area

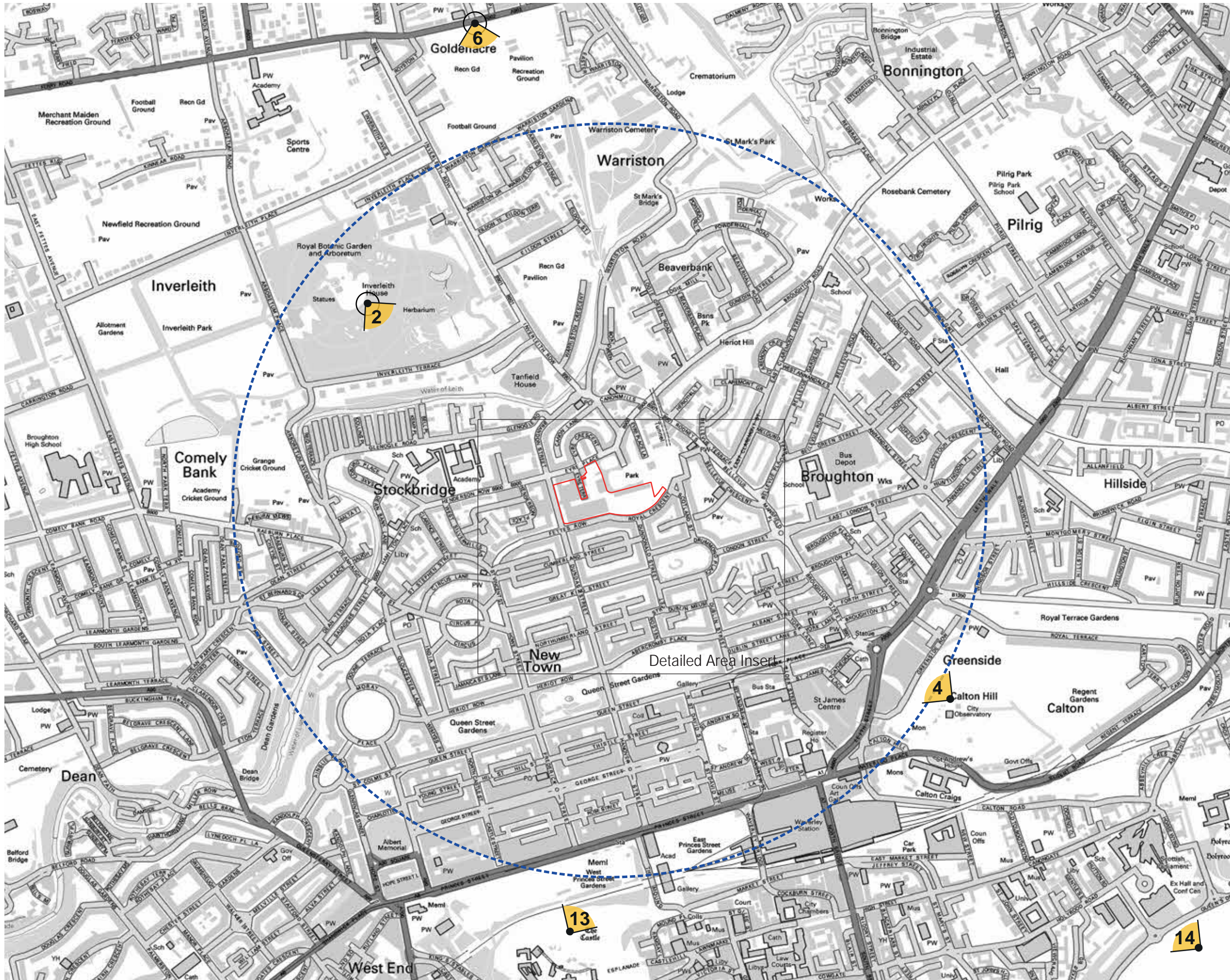
38. The study area for the townscape and visual assessment will comprise the area within which it is considered that there is potential for the Proposed Development to result in significant townscape or visual effects. It is likely that the Proposed Development would be visible from some points beyond this area but the effects of this would be so minor that detailed assessment is not warranted. (This approach is supported by GLVIA3 which states that the scale of assessment should be appropriate and proportional to the nature of the proposed development.)
39. The study area for this assessment will include both the Site and the surrounding wider context. The townscape character assessment considers the Site at a local level through the determination of local townscape character areas and the identification of townscape features. The visual assessment considers the existing and potential views within this defined study area.

Limitations and Assumptions

40. In considering the effects of the Proposed Development upon the significance of the identified townscape and visual receptors, the assessment will be based on the Proposed Development submitted for approval. Consideration will be given to the layout plans, elevations and Design and Access Statement. AVRs produced to demonstrate the effect of the Proposed Development within the Representative Views will also inform the assessment. This approach will allow for a balanced assessment that considers all the relevant material and allows for judgements to be made on design quality and associated mitigating effects.
41. In regard to the visual assessment, the assessment will not attempt to predict the visual effects of seasonal changes throughout the year, or the difference between day and night time effects, but describes the 'worst case' position in terms of the view when the Proposed Scheme would be most visible i.e. daytime views in the winter (when trees would have lost their leaves); and
42. Whilst a selection of RVs will be provided and further evaluation of the kinetic experience of visual receptors will be undertaken, not every available view within the study area will be illustrated and professional judgement will be used to assess the effects of the Proposed Scheme and when defining effects which are and are not significant.

Appendix 3: Viewpoint Location Plan









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-  Site Boundary
-  1km Radius Study Area
(Taken from centre of Site)
-  Detailed Insert (see following page)
-  Representative Viewpoint

Detailed Area Insert

CLIENT: _____

PROJECT:
New Town North

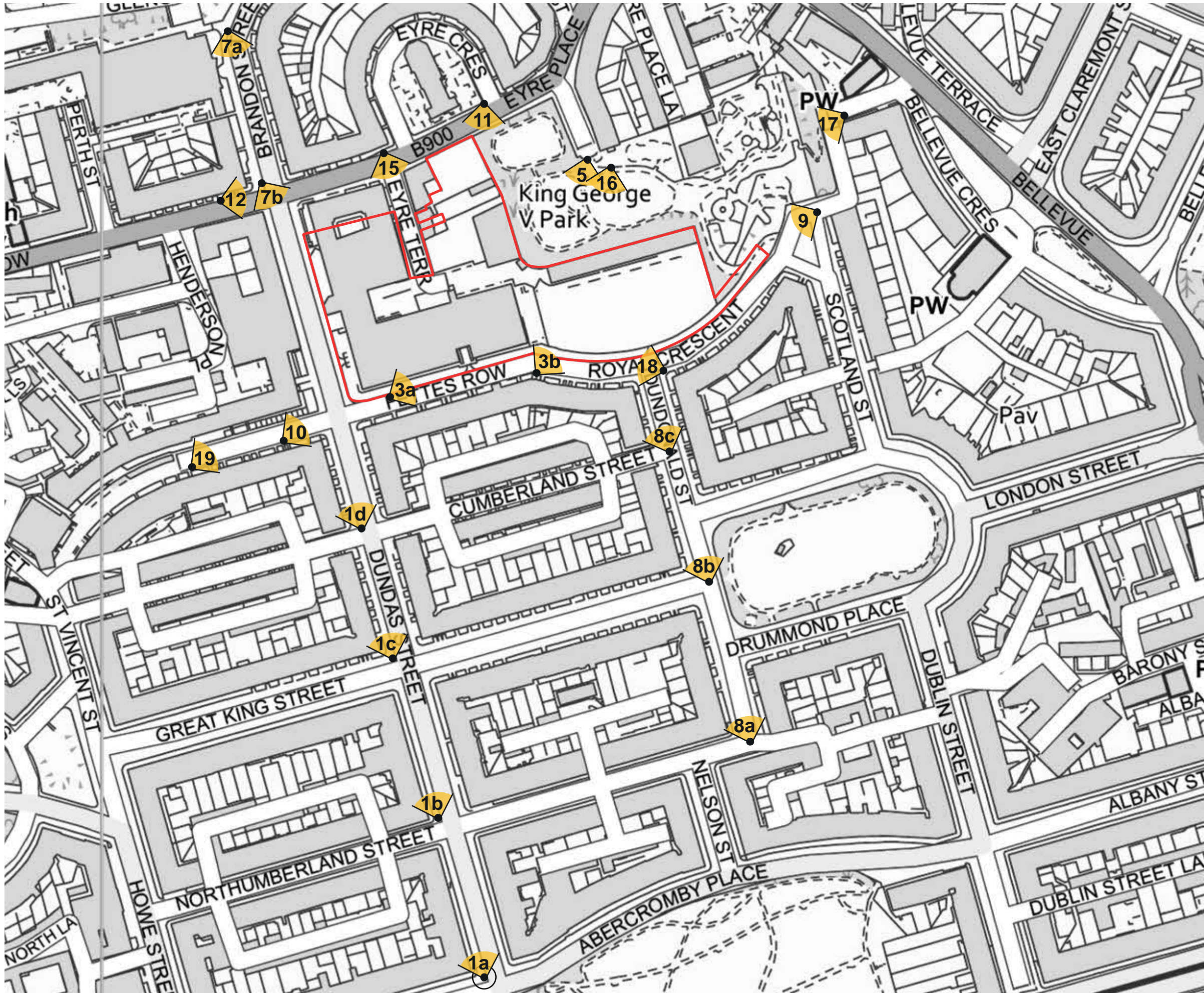
DRAWING:
Representative Viewpoint Location Plan

PROJECT NUMBER:
EDIE3001

DRAWING NUMBER: 02 CHECKED BY: CK

REVISION: 00 STATUS: Final

DATE: February 2025 SCALE: NTS@A3



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-  Site Boundary
-  Representative Viewpoint

CLIENT: _____

PROJECT:
New Town North

DRAWING:
Figure 3- Representative Viewpoint
Location Plan (Detailed Insert)

PROJECT NUMBER:
EDIE3001

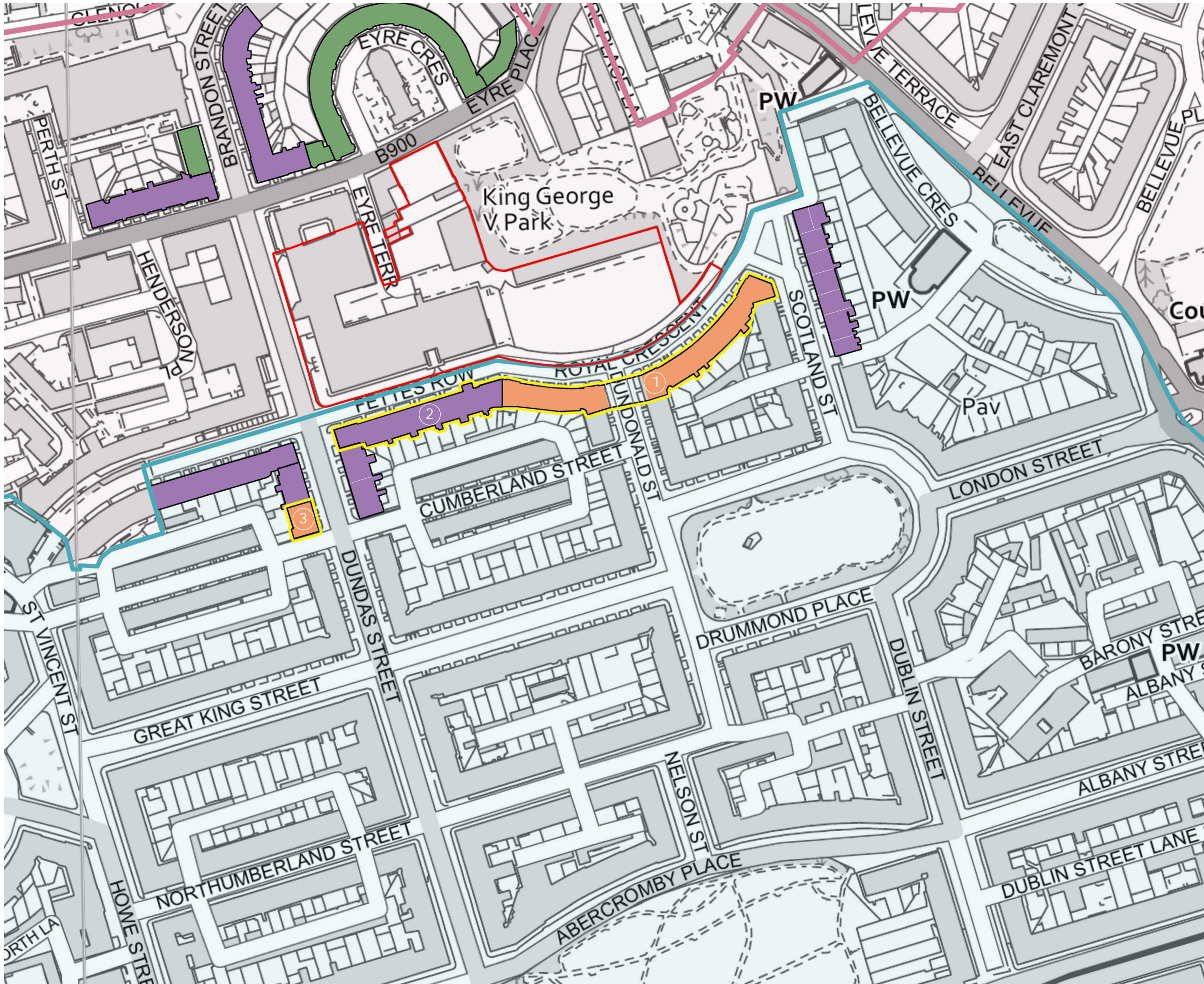
DRAWING NUMBER: 03 CHECKED BY: CK

REVISION: 00 STATUS: Final

DATE: February 2025 SCALE: 1:2500@A3

Appendix 4: Heritage Asset Plan





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- KEY**
- Category A-listed building
 - Category B-listed building
 - Category C-listed building
 - New Town Conservation Area
 - World Heritage Site
- Listed buildings (setting) to be assessed in ES.
- ① 1-13a Royal Crescent/24-24a Dundonald Street (Category A Listed Building LB29679) & 15-23a Royal Crescent/15 Dundonald Street/26-28 Scotland Street (Category A Listed Building LB29680)
 - ② 1-12 Fettes Row (Category B Listed Building LB28754)
 - ③ 78-86a (Even Nos) Dundas Street/36a Cumberland Street Including Railings (Category A Listed Building LB28721)

CLIENT:
Ediston Real Estate (Edinburgh)

PROJECT:
New Town North

DRAWING:
Cultural Heritage Assets
Proximate to Site

PROJECT NUMBER:
EDIE3001

DRAWING NUMBER: 01 **CHECKED BY:** CK

REVISION: 01 **STATUS:** Final

DATE: February 2025 **SCALE:** NTS @ A3