



Case reference	NAL-EDB-001
Application details	Listed Building Consent - Internal and external alterations, erection of shop fronts and associated works (as amended)
Site address	27, 29, 31 James Craig Walk, Edinburgh
Applicant Determining Authority Local Authority Area	Nuveen Real Estate City of Edinburgh Council
Reason(s) for notification	<i>Planning (Listed Buildings and Conservation Areas)(Notification of Applications) Direction 2015</i> – where Historic Environment Scotland has advised against the granting of listed building consent; conservation area consent or recommended conditions which the planning authority does not propose to attach to the consent, and the local authority are minded to grant consent, the application must be notified to Ministers.
Heritage Designations	Category B listed, New Town Conservation Area, World Heritage Site
Representations	3
Date notified to Ministers Date of recommendation	1 October 2020 17 December 2020
Decision / recommendation	Call-in

Description of Proposal and Site:

- 27-31 James Craig Walk in central Edinburgh is a five-storey sandstone terrace, immediately to the west of the ongoing St James Quarter redevelopment, a major development scheme in Edinburgh city centre. It is a category B listed building, located within the Old and New Towns of Edinburgh World Heritage Site and the New Town Conservation Area. It is one of only a few remaining elements of St James Square which was laid out in 1773 by James Craig (the designer of the 18th century Edinburgh New Town expansion) and was converted and adapted into the Sasine Office in 1902. St James Square and the terrace context was significantly altered by partial demolition, redevelopment and the construction of the modernist St James Centre in the 1970s.
- The current application is seeking amendments to an earlier scheme granted Listed Building Consent (LBC) in 2016 for internal and external alterations and ancillary works and that consent remains live - Ref: 16/03663/LBC. The site is also subject of an extant Planning Permission for change of use from student accommodation to Class 1 (shops), Class 2 (financial, professional and other services), Class 3 (food and drink) and Class 8 (hotel) uses where retail and catering units would occupy the lower and upper ground floors, with hotel accommodation above.
- The notified application seeks LBC for broadly the same works as approved under the 2016 consent, including the reinstatement of slated mansard roof and chimney stacks, porticos to upper ground floor level; raising of the external ground floor level; reinstatement of traditionally styled entrance stairs, and internal remodelling

including the removal of stairs. The significant difference is that the current application is proposing the addition of four two-storey projecting timber shopfronts on the northeast elevation of the listed building - this is the main change from the previous scheme. Visualisations of the proposal, an elevation drawing and historic photographs of the existing building, are included in Annex A.

Consultations and Representations:

- Historic Environment Scotland (HES) object to the application because they consider the introduction of a range of two-storey faux shopfronts on the terrace would significantly harm the character and special interest of the listed building. They consider the works would harm understanding and experience of the terrace, introducing an artificial interpretation of its history, from that of one of Edinburgh's first residential squares. HES consider that the demolition of the majority of St James Square was one of Edinburgh's worst architectural losses in the post-war period and that 27-31 James Craig Walk (along with the Category A listed twinned tenement at 24-25) represents the last surviving side of St James Square. Although the terrace concerned has been much altered, it survived the demolition of the remaining three sides of the Square but was left awkwardly sited with the lowering of the adjacent public realm with the only original doorpiece remaining marooned at first floor level, until it was removed later. (see Annex A).
- Representations from the Architectural Heritage Society of Scotland and two members of public were received by the Council during the consideration of the application. These raised concerns regarding the effect of the proposals on the listed buildings and the character of the surrounding area and on the privacy of nearby communal gardens.
- PAD consulted Scottish Government's Culture and Historic Environment Division (CHED) following notification. CHED consider the proposals raise issues of national significance, given the HES view that the proposed shopfronts would significantly harm the character and special interest of the listed buildings, and the lack of acknowledgement in the City of Edinburgh Council's report of the international significance of the location as a World Heritage Site. Options with less impact could have been explored further, and there is little evidence of alternative solutions having been considered by the Council, or of a clear rationale for granting consent given the issues the proposed development presents. CHED also recognise the St. James Quarter development is significant within the city centre and World Heritage Site and acknowledge the intention that the shopfront additions will be reversible and that the original window openings will be retained.

Assessment:

1. The City of Edinburgh Council are minded to grant Listed Building Consent for internal and external alterations, erection of shopfronts and associated works. The application has been notified because Historic Environment Scotland (HES) have objected to the application, solely on the basis of the proposed shopfronts. HES consider the shopfronts proposed are not traditional, but rather a timber and glazed screen placed over the elevations, and would harm the special interest of the buildings, which, despite alterations, still have a recognisable character, retaining all their façade openings (with only the former doors changed to windows). HES do not agree the shopfronts would retain the character of the building as the chosen form of the shopfronts is from a much later historical period and approach to shopfront design.

2. HES consider that there are other less harmful options for providing methods of advertisement for the units, including sensitive signage and hanging sign displays, free standing panel signs, feature lighting and advertisement from within the units. HES consider this is a retrograde step from the principles set out in the conservation plan, adopted for the buildings in 2014 on which the 2016 approved LBC was based.
3. The Council's Archaeology Officer states the proposed additions of wooden shop fronts are considered to have a significant and potentially adverse, impact upon the original character of these Georgian tenements by adding new and prominent architectural details. On archaeological grounds this impact is considered to be relatively moderate in terms of the impact upon the fabric and understanding of the building. They recommend that the following condition is attached in order fully record these important industrial buildings but also any associated buried remains as follows; 'No demolition/ development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (historic building recording, excavation, recording and analysis, publication) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.' No conditions are proposed to be attached by the Council.
4. The applicant, in their submitted Planning Statement, indicate in order to realise the retail/commercial uses within the upper and lower ground floor units, enhanced visibility is required to attract occupiers to the development. The physical alterations to the building, including the reinstated entrances, shopfronts and scale and platt entrance stairs are required to physically connect and associate the building to the new square levels and help assist with pedestrian connectivity. Their proposals seek to improve the appearance and significance of the listed building, enabling it to provide suitable frontage to the new square and ensure the listed building responds to its changing context within the city.
5. The Council considers that traditional style shopfronts are required for retail display and would provide a distinct public face and frontage to address the new St James Quarter development, hotel and public square. Their committee report acknowledges that the shopfronts will change the character of the building from a plain domestic tenement but suggests they be considered as a whole in terms of the level of change to the existing building, including conservation benefits of the reintroduction of original features such as the mansard roof and chimney stacks, porticos, entrance stairs and improvements to the public realm. The Council also notes that the shopfront changes are reversible and can be removed later if no longer required, and the original window openings would be retained.
6. The committee report states that there are exceptional circumstances in this case that would justify the addition of the shopfronts. Whilst, the validity of HES's assessment and concern is acknowledged, with the preference being that the tenement is conserved and restored as originally intended, it is considered by the Council that there are overall benefits to the building which outweigh any negative aspect of these additions. It also states that considering the wider redevelopment of the St James Quarter and formation of the new public square, the change in character from domestic tenement to a more commercial orientation, reflects the changing nature of this part of the city and the building's

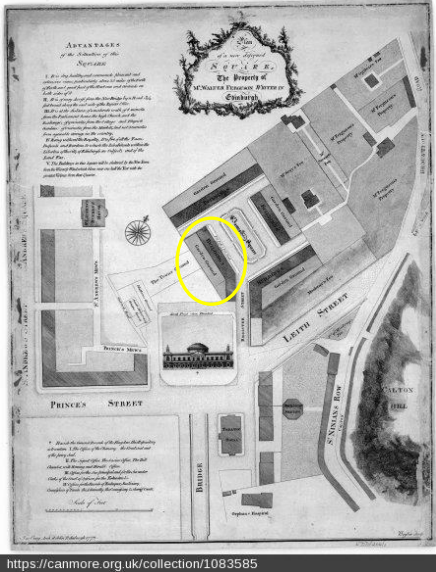
ongoing history. Therefore the Council concludes, in this exceptional circumstance, that the addition of the proposed shopfronts to the listed building is acceptable.

7. A parallel application for Planning Permission for the revised scheme has recently been approved by The City of Edinburgh Council. In its consultation advice on the planning application, HES focused on the impacts of the proposal on the setting of the Category A listed building adjacent and on the World Heritage Site. HES considered that the proposed shopfronts would cause some harm to the setting of the adjacent A-listed tenement and could limit understanding of the two buildings as part of the same linked 18th Century development, but that the harm would not be substantial. HES's view, that the proposals did not raise historic environment issues of national significance, is purely in relation to the A-listed building (as opposed to impacts on the character of the B listed building itself), and therefore they did not object to the planning application.
8. PAD recognises the historic and architectural importance of the B listed building in central Edinburgh and within the core of the World Heritage Site and understands that its immediate context has been substantially altered from its original residential purpose over the last century. The conversion and adaptation of the listed building ensures its continued use with or without the proposed shopfronts. In this particular instance, the addition of a range of shopfronts, would retain the existing elevations and window openings/surrounds with no further loss of historic fabric (apart from the existing windows). PAD considers that HES's concern is valid as a modern intervention of the scale and nature proposed is advised against in historic environment guidance and would not normally be considered acceptable on the frontage of a listed building, especially one within a World Heritage Site.
9. PAD considers the issues are very finely balanced, given the unique circumstances, the current economic climate, that the building has been so heavily altered from its original context and design, and that it would form a significant element of the public space to the St James Quarter redevelopment. Each case has to be considered on its own merits, however information regarding the materials, detailing, specifications and number and type of necessary stonework fixings is lacking therefore the impacts of the proposed shopfronts on the listed building cannot be fully assessed or understood. It is noted that no conditions are to be imposed to adequately control or safeguard the impact of the works on the B-listed building.
10. PAD considers that the Council has carefully weighed up the advice of HES and their view is that the changing context provides sufficient justification for granting listed building consent in exceptional circumstances, contrary to that advice. However, on balance it is considered that the proposal has a nationally important context and would benefit from further scrutiny by Scottish Ministers to fully assess the impact on the B-listed building, given HES's concern.

Decision/Recommendation:

- It is recommended that this application is called in for Ministers' determination.

Annex A - 27, 29, 31 James Craig Walk, Edinburgh - Images



<https://canmore.org.uk/collection/1083585>
1773 plan by James Craig



<https://canmore.org.uk/collection/1112251>
2008 aerial photograph prior to demolition of St James Centre with 27-31 James Craig Walk outlined in yellow



1958 aerial photograph of St James Square prior to partial demolition in 1970 for St James Centre development

1956 - St James Square prior to redevelopment with 27-31 James Craig Walk on the right prior to removal of last entrance door piece.



2012 - James Craig Walk– prior to demolition of New St Andrews House to left



2012 – 27-31 James Craig Walk with A listed St James Square remnant on the right



North east elevation as existing (submitted by the applicant):



North East Elevation | Existing

PLANNING
 Scale: 1:100
 Date: 20/01/19
 Sheet: 01
 Revision: 1 (ISSUED)
 Project: 2017/19
 Issue for PLANNING

North east elevation as proposed (submitted by the applicant):



North East (facade) Elevation | Proposed

Annotations
 North East (facade) Elevation
 Drawing Number
LPL230
PLANNING
 Scale: 1:100
 Date: 20/01/19
 Sheet: 01
 Revision: 1 (ISSUED)
 Project: 2017/19
 Issue for PLANNING

Revised Annotation Key

- 1. New window unit
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Visualisations/context of the proposals (submitted by the applicant):

