



Report to the Scottish Ministers

PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) (SCOTLAND) ACT 1997

Report by Mike Croft, a reporter appointed by the Scottish Ministers

- Case reference: NAL-EDB-001.
- Site address: 27, 29 and 31 James Craig Walk, Edinburgh EH1 3BA.
- Application by Nuveen Real Estate.
- Application for listed building consent, ref. 20/02527/LBC dated 23 June 2020, called in by notice dated 22 December 2020.
- The works proposed: internal and external alterations, erection of shopfronts and associated works.
- Date of site visit: 25 March 2021.

Date of this report and recommendation: 20 April 2021



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HES	Historic Environment Scotland
PAD	the Planning and Architecture Division in the Scottish Government's Directorate for Local Government and Communities
1997 Act	Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997



Summary of Report into Called-In Application for Listed Building Consent

Internal and external alterations, erection of shopfronts and associated works at 27, 29 and 31 James Craig Walk, Edinburgh EH1 3BA

• Case reference	NAL-EDB-001
• Case type	Call-in
• Reporter	Mike Croft
• Applicant	Nuveen Real Estate
• Planning authority	Edinburgh City Council
• Other parties	Historic Environment Scotland The Architectural Heritage Society of Scotland Mr S Elliot Mr A C O Jack
• Date of application	23 June 2020
• Date case received by DPEA	22 December 2020
• Method of consideration and date	Written submissions, and unaccompanied site inspection on 25 March 2021
• Date of report	20 April 2021
• Reporter's recommendation	Grant listed building consent

Background

Ministers' reasons for call in

The case was called in because of the proposed development's potential impact on national historic environment policies. Concerns had been raised by HES, and PAD considered its concern to be valid, stating that 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. But in the light of the council's consideration of the application, PAD also felt the issues to be very finely balanced. So it was concluded that the proposal would benefit from further scrutiny by Scottish Ministers to fully assess the impact of the works on the application building.

The policy context

The significance of the application building is recognised by its listing in category B. Section 14(2) of the 1997 Act requires Ministers to have special regard to the desirability of preserving such a building or its setting or any features of special architectural or historic interest which it possesses.

Significant HES policies include those seeking decisions to be informed by an inclusive understanding of the breadth and cultural significance of any part of the historic environment, to ensure that this is secured for present and future generations, to identify opportunities for enhancement, and to minimise detrimental impact. As for managing change in the historic environment, HES is clear that we cannot have the benefits of listed buildings without caring for them; that a listed building cannot be replaced once it has gone, and the best way to protect it is usually to keep it in use; that decisions about listed buildings should always focus on the qualities that make them important; that for a building to stay in use over the long term, change will be necessary; that even extensive alterations to a building will be better than losing the building entirely; and that keeping a listed building in use helps us to build successful places.

The application building's location within the New Town Conservation Area means, through section 64 the 1997 Act, that special attention is also to be paid to the desirability of preserving or enhancing the character or appearance of that area.

There are a number of material policies in the local development plan and in further guidance that it has issued. These are very much aligned with the national policies and guidance referred to above.

The site is also within the Old and New Towns of Edinburgh World Heritage Site. Although no further powers arise from this, it is a material consideration.

The application building and its surroundings

The application building is a tenement building of (when the application was made) four storeys plus an attic. It is part of a group which also includes the adjoining Sasine Office (also listed in category B) and, about 10 metres away, a five-storey tenement building at 23-26 St James Square¹ (category A). James Craig Walk is to be a pedestrian route. To the east of it, and generally extending as far as Leith Street in the east, is an area of substantial and ongoing commercial redevelopment known as Edinburgh St James.

The council's character appraisal for the conservation area indicates the area to be typified by formal plan layouts, spacious stone-built terraces, broad streets and an overall classical elegance. The appraisal also states that the form and appearance of shop fronts make an important contribution to the appearance and character of certain parts of the area.

The application building's history in its context

The application building was erected as a five-storey residential tenement building in the late 1770s. It formed the bulk of the south-western side of St James Square, which was designed by James Craig who had earlier won the competition for the design of Edinburgh New Town. However, plans of the time show little design connection between St James Square and the remaining part of the New Town.

In the early years of the 20th century, the application building was significantly altered. The alterations included the replacement of its pitched slated mansard roof by an attic storey

¹ The building at 23-26 St James Square is sometimes given the numbers 24-25, and is sometimes referred to as being on James Craig Walk.

with a flat roof and much internal stripping out. It was then used as an extension of the adjoining Sasine Office. That use continued until 2002, when it was converted to student flats.

The late 1960s and early 1970s saw the wholesale clearance of the area to the east for the development of the St James Centre shopping complex. This left the application building and the nearby numbers 23-26 as the only remnants of St James Square, with the ground level lowered immediately to the north-east of the application building.

The early 1970s redevelopment was itself the subject of redevelopment proposals in 2008. These proposals included the application building. The council granted outline planning permission in 2009 for redevelopment and refurbishment to provide a mixed use development (Edinburgh St James), including retail, leisure and culture, hotel, offices, food and drink uses, and residential uses. That permission included a new hotel building at what would form part of a new St James Square located roughly where the original square had been. The permission authorised the raising of the level of the square back to its original level. Subject to subsequent approvals, this redevelopment is now proceeding. The illustrative masterplan accompanying the 2008 application showed the application building as having two levels of retail (at upper and lower ground floors), and sketch plans showed projecting single-storey shop fronts. However, no details of the retail frontages at the application building have so far been granted listed building consent.

The application works in their context

In 2016, the council granted planning permission for the change of use of the application building to shops, financial, professional and other services, and/or food and drink uses and hotel use. Listed building consent for a wide range of internal and external alterations was also granted in 2016. These included the reinstatement of the slated mansard roof, taking down and rebuilding the original chimney stacks to their original height, reintroducing entrance porticos to the reinstated raised ground level, replacing existing non-original windows and restoring the original fenestration pattern, introducing a new lift core, and removing an original turnpike stair.

In September 2020 the council granted planning permission, subject to conditions, for the scheme which is now in question on the matter of listed building consent, ie including the erection of projecting two-storey shopfronts.

In effect, the applicant now seeks consent for amendments to the 2016 listed building consent. The lower two storeys (lower and upper ground floors) would provide a mixture of shops, financial, professional and other services and food and drink uses within six commercial units. Above these commercial units would be an apart-hotel. The main difference now proposed from the works previously consented² is the proposed installation of four two-storey projecting shopfronts on the main, north-east, elevation. They would be of a traditional design and use traditional materials. The existing walls would remain behind the new shopfronts, and fixings into the historic fabric would be minimised. The interiors of the commercial units would be accessed through consented openings.

² There are also many elements common both to the works previously consented and those that make up the works now in question.

The applicant's case

The inclusion of the shopfronts now proposed should not alter the conclusions reached in the assessment of the previous applications. The application building will form one side of the new St James Square. The application proposals ensure that the building responds to its changing context within the city and remains in active and productive use as part of the new retail and leisure quarter. The shopfronts are important in providing the application building with an inviting and outward looking face, and bringing much needed active connectivity between the building and the new square.

The heritage value of the application building

The building has medium historical significance as, along with 23-26 St James Square, it is the only surviving part of the former St James Square. But Craig's layout for the square did not satisfactorily reconcile it with the geometry of the eastern edge of the New Town. The building has low evidential value because it has been so heavily altered and damaged, both externally and internally, that it has almost completely lost its link to the square, and its recent state says little about the original building. It has low architectural and aesthetic value, because the early 20th century alterations almost entirely detached it from the public realm, the changes to the roofline had a negative impact on the building's aesthetic value, and the building was further compromised by the changes to the street level in the 1960s and 1970s. It has low communal value, having become largely obscured from the streetscape of the city as a result of the nearby 1970s redevelopment.

Commercial considerations

When considering store acquisitions retailers are now comparing opportunities across Europe. Potential occupiers are reluctant to proceed if the commercial units do not have a commercial presence within the new square. It is not believed that it will be possible to successfully let the units to retailers without enhancing the frontage as proposed. The proposed shopfronts would create additional interest and give opportunities to occupiers to stamp their identities on the building which would bring it to life. Computer-generated illustrations of what is now proposed have been marketed to retailers resulting in immediate offers for the space.

Shopfront design

The traditionally styled and sensitively proportioned projecting shopfronts would provide a distinct public face that addresses the new square while respecting and responding to the special interest of the listed building.

Most of the lower and upper ground floors across St James Square were converted to shop units in the 19th century. The design of the proposed shopfronts is intended visually to reflect high-quality examples seen in the New Town. Careful attention has been paid to materials, proportions and detailing, and to the composition of the elevation as a whole, to maintain a harmonious façade and attractive streetscape.

The proposed shopfronts would be low-impact in relation to the original building fabric to allow for possible future reversibility. The new shopfront display areas would be accessed through the retained openings in the existing front wall. So the approach is reversible, safeguarding the building's heritage for the future.

Heritage impact of the application proposals

The significant alterations proposed in 2016 to the front elevation and roof of the application building, and now repeated, will return some of its original character that was lost as a result of the earlier alterations. It is accepted that the loss of the turnpike stair is an adverse feature of the proposals, but it had seen numerous interventions and was not a rare feature. The 2016 scheme (as consented) was therefore considered to be beneficial overall.

The main variation from the 2016 proposals – the proposed shopfronts – would cause minimal impact to the original fabric of the building and would not discernibly harm the building's significance. If the shopfronts do not proceed, the upper ground floor of retail units would remain unoccupied, which would be highly adverse to the heritage asset. While not an authentic restoration of the original building, the proposed scheme would be beneficial in returning the entirety of the building back into use. The proposal is resonant with many examples of shopfronts found throughout the New Town and would work to positively strengthen the connection to the new square. With the exception of the removal of the turnpike stair and minor alterations required to attach the shopfronts to the façade, the alterations would generally affect modern fabric only. The overall heritage impact of the commercial frontages proposal on the front elevation of the building is neutral.

Conditions

The council propose no conditions, and there is no need to duplicate the September 2020 planning permission conditions relating to external materials, the paint colour scheme of the shopfronts and details of the extract flue and ventilation system. Relevant details are included in the application plans. An archaeological watching brief is already in place.

Conclusions

The proposed external alterations, including the new shopfronts, are the minimum interventions required to bring the building into beneficial use. The proposals have an acceptable impact on the site's historic context including the conservation area, and would not adversely impact the setting of any listed building. They comply with Historic Environment Policy for Scotland (2019). Their impact on the international significance of the location within the World Heritage Site is more appropriately considered as part of an application for planning permission, as was done here.

The council's case

Listed building

The shopfronts would change the character of the building from a plain domestic tenement, but this must be considered as part of the wider regeneration of Edinburgh St James and the building's changing relationship with the new St James Square, hotel and shopping centre. The proposals must also be considered as a whole in terms of the level of change to the building, including the conservation benefits of the reintroduction of original features. These changes are a significant conservation gain by the scheme, and they align with the aspirations of HES's Managing Change guidance.

The traditional design of the shopfronts would retain the character of this built heritage asset within the wider Edinburgh St James, creating an attractive juxtaposition with the contemporary St James Square. The shopfront changes would be reversible and could be removed later if no longer required. The inclusion of shopfronts would contribute towards the building's sustainability.

Any harm to the setting of the listed building by reducing its residential appearance or to its relationship with the neighbouring A listed tenement that survives in near original condition has to be seen in the context of the exceptional circumstance of the adjacent redevelopment.

The council's conclusion

The reuse of the building will form part of a diverse mix of uses and contribute towards the comprehensive Edinburgh St James redevelopment. The proposals would comply with the local development plan. They would enhance the character of the listed building and the character and appearance of the conservation area. The scheme accords with sections 14 and 64 of the 1997 Act.

The council Archaeology Officer's comments

It is recommended that an archaeological survey of the existing building is undertaken prior to and during any alterations and ancillary works, and that a condition is imposed to make an appropriate full record.

The case for Historic Environment Scotland

HES objects because the introduction of a range of two-storey shopfronts on the 18th century terrace would significantly harm the character and special interest of the listed buildings.

The application building and numbers 23-26 represent the last surviving side of St James Square, planned and designed by the New Town's architect James Craig. Although the south-western side of the square has been much altered, it survived the late 1960s demolition of the remaining three sides. The 2016 consent was for a sensitive set of proposals, with the proposed restoration being seen as a major conservation benefit.

However, the current shopfront proposals would be significantly harmful to the building's character and special interest, and are a retrograde step away from the 2016 proposals. The extent of the alterations proposed is neither necessary nor desirable. There is scope for uses that complement the character and special interest of the building, as well as for sensitive signage, hanging signs, free-standing panel signs and the use of feature lighting. Several retail and catering units operate behind similar Georgian façades in Edinburgh without the need for shopfronts.

The shopfronts proposed here – timber and glazed screens placed over the elevations – would not retain the Georgian heritage of the building, as the chosen form of the shopfronts is from a much later historical period and approach to shopfront design. The works would introduce an artificial interpretation of the building's history and differentiate it from its category A listed neighbour at numbers 23-26, which survives in near original condition.

The cases for other third parties

The Architectural Heritage Society of Scotland says that the introduction of the shop fronts would drastically alter the building's appearance and therefore its historic importance.

Mr S Elliot says the design is not in keeping with the area.

Mr A C O Jack says the shopfronts would dramatically change the Georgian appearance of the south-western side of the original St James Square, apparently breaching the historic building line.

Reporter's assessment and recommendation

The building's original significance, as one side of a formal Georgian residential square with a strong association with James Craig, was muted by the design disconnection between St James Square and the extensive formal layout only a short distance to the west. Further significance was then lost at the beginning of the 20th century and in the 1960s/1970s. The much-altered application building became something of a backwater largely unrelated to the development around it. The application building is therefore a remnant of 18th century town planning, but its original planning context has long gone.

I see the inclusion of a rehabilitated application building within the scope of the Edinburgh St James redevelopment proposals as a rescue operation for the building itself. In addition, there will be a significant pedestrian space in front of the application building which will link it functionally and spatially with the entirely modern elements of Edinburgh St James.

Although the focus of this case is the proposed provision of shopfronts, the application in question includes a very wide range of other proposed works, most of which already have listed building consent. Some of the works already consented have an adverse effect. But apart from the loss of the turnpike stair, very little of significance is now being lost as a result of the internal works: the major losses in that respect were over a century ago. Putting the shopfronts to one side for the moment, the external works also provide very significant benefits in relation to the building's listing, including the reinstatement of the mansard roof, the rebuilding of chimney stacks to their original height, the reintroduction of entrance porticos and the restoration of the original fenestration pattern.

No listed building consent has so far been granted for shopfronts of any kind here. Nor is there any firm evidence that the application building has ever had shopfronts. But shopfronts have been added to other Georgian buildings in the New Town. The shopfront design in this case reflects a later (post-Georgian) period, but there are very few examples of Georgian shopfront design to be seen in the New Town. The shopfronts would not be out of character with the New Town and conservation area context. They would have minimal physical impact on the existing fabric of the building behind them. The criticism of the proposals in terms of the building line does not readily fit the circumstances of this case.

There is no evidence of an explicit examination of design alternatives, and this is an omission in the applicant's case that ought to have been avoided, but it is difficult to identify specific harm in the design that is put forward. That design should ensure, with the other elements of the proposals, that the building remains in beneficial use.

There are few locations where the application building will be seen together with the other listed buildings nearby. There would undoubtedly be a visual contrast with the substantially unaltered form of the A-listed numbers 23-26. But to regard that as harmful would, it seems to me, be too narrow a view. Instead, my assessment is very much like the council's – that the wider redevelopment now in progress, including the formation of a new public square, provides an exceptional circumstance that outweighs any such harm.

The commercial evidence as presented is quite stark. I accept that Edinburgh is competing with international opportunities, and the risk of having unlet units in a prominent location within an area of major redevelopment is not one to be taken lightly. A refusal in this case would be likely to lead, at least, to a significant delay in the application building coming fully back into use. This would amount to delay in the complete building yielding enjoyment and benefit, and that could present an image problem for the nearer parts of the Edinburgh St James development.

Looking at the proposals overall, including the shopfronts and also including all the other elements, I do not believe harm to the character or appearance of the conservation area and the World Heritage Site is demonstrated. Overall, again, I believe the requirements of policies HEP1, HEP2 and HEP4 in "Historic Environment Policy for Scotland" are met. A consent would be consistent with the duties imposed by sections 14(2) and 64 of the 1997 Act.

I therefore conclude that listed building consent should be granted.

Conditions and informatives

Like the applicant, I see no need to duplicate the conditions for what is the same project that is the subject of the September 2020 planning permission, and that, together with the details already submitted, seems sufficient.

The suggested need for a condition relating to archaeological work is obviated by the 2016 planning permission including a condition requiring the implementation of an approved programme of archaeological work, the existence of the applicant's watching brief, and the absence of new archaeological issues.

Similarly, no informative needs to be appended to a consent.

Therefore, if consent is to be granted, I perceive no need for any condition or informative.

Recommendation

I recommend that listed building consent be granted.

Scottish Government
Planning and Environmental Appeals Division
Hadrian House
Callendar Business Park
Callendar Road
Falkirk
FK1 1XR

DPEA case reference: NAL-EDB-001

The Scottish Ministers
Edinburgh

Ministers

I conducted an unaccompanied site inspection on 25 March 2021 in connection with an application to Edinburgh City Council for listed building consent for internal and external alterations, the erection of shopfronts and associated works at 27, 29 and 31 James Craig Walk, Edinburgh EH1 3BA. The council had been minded to grant consent for the works against the advice of Historic Environment Scotland, and Ministers had decided that the application should be referred to them for determination. This was because of the proposed works' potential impact on national historic environment policies, and it was considered that the issues raised would benefit from further scrutiny. I have been asked to submit a report on the matter, with recommendations, to Ministers for their consideration. This is that report.

I have taken account of the observations I made at my site inspection and of all the information before me. This includes the documentation associated with the application to the council, PAD's assessment report and correspondence on it, and further documentation made available in response to my limited requests. I have seen no need to hold any oral process.

My report deals in turn with the background (the reasons for call-in, the policy context, the site and its surroundings, the application building's history and the application works); the cases for the applicant, the council, Historic Environment Scotland, and other third parties; and my assessment and recommendation.

CHAPTER 1. BACKGROUND

MINISTERS' REASONS FOR CALL IN

1.1 The [call-in letter](#) to the Edinburgh City Council is dated 22 December 2020. The letter noted that the council was minded to grant listed building consent for the development against the advice of HES. It stated that Ministers had decided that, under section 11 of the 1997 Act, the application should be referred to them for determination. This was because of the proposed development's potential impact on national historic environment policies, and it was considered that the issues raised would benefit from further scrutiny.

1.2 Call-in had been recommended by PAD. Its Assessment Report (December 2020) is [here](#). PAD had consulted the Scottish Government's Culture and Historic Environment Division, which noted the lack of acknowledgement in the council's report of the international significance of the location as a World Heritage Site.

1.3 PAD states that the conversion and adaptation of the application building ensures its continued use with or without the proposed shopfronts. It comments that the addition of a range of shopfronts, as now proposed, would retain the existing elevations 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.

1.4 However, 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. It notes that no conditions are to be imposed to adequately control or safeguard the impact of the works on the application building. It says that information regarding the materials, detailing, specifications and number and type of necessary stonework fixings is lacking, so the impacts of the proposed shopfronts on the listed building cannot be fully assessed or understood.

1.5 PAD considers that the council has carefully weighed up the advice of HES. It notes the council's view 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 application building.

THE POLICY CONTEXT

Statutory requirements and national policy

1.6 The significance of the application building is recognised by its listing in category B. This indicates that the building is of regional or more than local importance, or a major example of some particular period, style or building type. This categorisation is advisory, without statutory weight, but is an important material consideration in decision making.

1.7 Section 14(2) of the 1997 Act says that, in considering whether to grant listed building consent for any works, Scottish Ministers "*shall have special regard to the*

desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.” In effect, this is a presumption against development that would have an adverse effect on the listed building, its setting or features of special interest.

1.8 HES’s “Interim Guidance on the Principles of Listed Building Consent” (2019) is a material consideration. Its paragraph 6 states: *“The majority of listed buildings are adaptable and have met the needs of successive generations while retaining their character. Change should therefore be managed to protect a building’s special interest while enabling it to remain in active use...”*. Paragraph 9 says: *“Listed buildings ... require alteration and adaptation from time to time if they are to remain in beneficial use, and will be at risk if such alteration and adaptation is unduly constrained. In most cases such change, if approached carefully, can be managed without adversely affecting the special interest of the building.”*

1.9 A significant material consideration is HES’s Historic Environment Policy for Scotland (2019), which sets out how the historic environment should be cared for in cases of this sort. Its policies include these:

“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.”

“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.”

1.10 HES’s guidance “Managing Change in the Historic Environment - Use and Adaptation of Listed Buildings” (2019) sets out the principles that apply to the works in this case. It contains six key messages which I summarise as below.

1. We cannot have the benefits of listed buildings without caring for them.
2. A listed building cannot be replaced once it has gone, and the best way to protect it is usually to keep it in use.
3. Decisions about listed buildings should always focus on the qualities that make them important.
4. For a building to stay in use over the long term, change will be necessary. Proposals that keep buildings in use, or bring them back into use, should be supported as long as they do the least possible harm.
5. Alterations to a building, even if they are extensive, will be better than losing the building entirely.

6. Keeping a listed building in use helps us to build successful places.

1.11 My attention is drawn to paragraph 137 of Scottish Planning Policy. This states “... *Change should be sensitively managed to avoid or minimise adverse impacts on the fabric and setting of the asset, and ensure that its special characteristics are protected, conserved or enhanced.*” Paragraph 141 includes this: “*Change to a listed building should be managed to protect its special interest while enabling it to remain in active use. ... The layout, design, materials, scale, siting and use of any development which will affect a listed building or its setting should be appropriate to the character and appearance of the building and setting. ...*”.

1.12 The application building’s location within the New Town Conservation Area means, through section 64 the 1997 Act, that special attention is to be paid to the desirability of preserving or enhancing the character or appearance of that area. Paragraph 143 of Scottish Planning Policy states: “... *Proposals that do not harm the character or appearance of the conservation area should be treated as preserving its character or appearance. ...*”.

1.13 Planning Advice Note 71 on Conservation Area Management (2004) states that many conservation areas “*need to continue to adapt and develop in response to the modern-day needs and aspirations of living and working communities. This means accommodating physical, social and economic change for the better. Physical change in conservation areas does not necessarily need to replicate its surroundings. The challenge is to ensure that all new development respects, enhances and has a positive impact on the area.*”

1.14 The site is within the Old and New Towns of Edinburgh World Heritage Site. Although no further powers arise from this, it is a material consideration.

1.15 The Statement of Outstanding Universal Value for the World Heritage Site refers to:

“The remarkable juxtaposition of two clearly articulated urban planning phenomena. The contrast between the organic medieval Old Town and the planned Georgian New Town of Edinburgh, Scotland, provides a clarity of urban structure unrivalled in Europe. The juxtaposition of these two distinctive townscapes, each of exceptional historic and architectural interest, which are linked across the landscape divide, the “great arena” of Sir Walter Scott’s Waverley Valley, by the urban viaduct, North Bridge, and by the Mound, creates the outstanding urban landscape.”

...

“Authenticity. 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 intactness.”

1.16 The materiality of this is indicated in paragraph 147 of Scottish Planning Policy which says “*World Heritage Sites are of international importance. Where a development proposal has the potential to affect a World Heritage Site, or its setting, the planning authority must protect and preserve its Outstanding Universal Value.*”

The council's policies

1.17 There are a number of material policies in the Edinburgh Local Development Plan (adopted in 2016).

- Policy Env 1 says *“Development which would harm the qualities which justified the inscription of the Old and New Towns of Edinburgh ... as World Heritage Sites or would have a detrimental impact on a Site’s setting will not be permitted.”*
- Policy Env 3 says *“Development within the curtilage or affecting the setting of a listed building will be permitted only if not detrimental to the architectural character, appearance or historic interest of the building, or to its setting.”*
- Policy Env 4 says *“Proposals to alter or extend a listed building will be permitted where (a) those alterations or extensions are justified; (b) there will be no unnecessary damage to historic structures or diminution of its interest; and (c) where any additions are in keeping with other parts of the building.”*
- Policy Env 6 says *“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 ... 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.”*
- Policies Env 8 and Env 9 seek to protect archaeological remains.

1.18 Local development plan policy Des 13 relates to alterations to shopfronts. The proposal here is for new shopfronts, not alterations, but I note that policy Des 13 says shopfronts should *“relate sensitively and harmoniously to the building as a whole”*.

1.19 The council’s character appraisal for the conservation area refers to proposals for alterations and extensions there. It says they *“... will normally be acceptable where they are sensitive to the existing building, in keeping with the character and appearance of the particular area and do not prejudice the amenities of adjacent properties. Extensions should be subservient to the building, of an appropriate scale, use appropriate materials and should normally be located on the rear elevations of a property.”*

1.20 The applicant draws attention to the council’s “Guidance for Businesses” (2019). This includes a section entitled “Altering a Shopfront”. Taking the points that are potentially relevant here, it says

- *“Consider the period of the building and the style of the shopfront. (Shopfronts come in many styles, reflecting the different periods of architecture in Edinburgh.)”*
- *“Shopfronts should be designed for their context by considering the relationship of the frontage to the rest of the street (... One shopfront across two separate buildings will not normally be acceptable as it disrupts the vertical rhythm of the facades above.)”*

- *“Consider the relationship to features on the upper floors. (Where units have a narrow frontage and vertical emphasis, they should retain their individual integrity, rather than attempting to achieve uniformity with adjoining properties.)”*
- *“Consider the design and materials to be used. (... Reproduction frontages should be based on sound historical precedent in terms of archival evidence or surviving features.)”*

1.21 My attention is also drawn to the council's "Guidance on Listed Buildings and Conservation Areas" (2019) as it relates to staircases. It says *“The removal or alteration of any historic staircase, including handrails and balusters, is not normally acceptable. The stair is often the most significant piece of design within a building and can be important dating evidence.”*

THE APPLICATION BUILDING AND ITS SURROUNDINGS

1.22 The location is well seen in the applicant's [site location plan](#), one of the application plans.

1.23 The application building has a frontage approaching 50 metres to the north-east, and is a maximum of about 20 metres deep. Its full listing is at Appendix A of [this](#) document.

1.24 The building has 17 bays, with (when the application was made) four storeys plus an attic. It is constructed of coursed ashlar sandstone walls on the principal north-east elevation and random rubble sandstone facing walls on the rear and gable elevations.

1.25 The list describes the application building as part of a group which also includes the adjoining Sasine Office of the General Register House and 23-26 St James Square³. The Sasine Office (also listed in category B) adjoins the application building to the south-east, and the General Register House itself (category A), which has its main frontage to the eastern end of Princes Street, comes after the Sasine Office with a gap of a few metres. Behind the application building to the south-west is the Register House garden and New Register House (category A). A little over 10 metres to the north-west of the application building is a five-storey tenement building at numbers 23-26 (category A), and then modern commercial development. James Craig Walk is to be a pedestrian route. To the east of it, and generally extending as far as Leith Street in the east, is an area of substantial commercial redevelopment, now proceeding, known as Edinburgh St James.

1.26 Further details of the application building's features can be found within the applicant's 2016 [Design Statement](#).

1.27 The application building is located in the eastern half of the New Town Conservation Area. This covers an area of about 3.7 kilometres (west to east) by 2 kilometres (north to south). The council's [New Town Conservation Area Character Appraisal](#) says *“The Conservation Area is typified by formal plan layouts, spacious stone built terraces, broad streets and an overall classical elegance. The majority of buildings are of a standard type that expresses Georgian ideals of urban living. ... The street elevations of each property typically follow a standard form of evenly spaced vertically proportioned sash windows, with a door at street level. There is usually a high proportion of masonry to window opening on*

³ The building at 23-26 St James Square is sometimes given the numbers 24-25, and is sometimes referred to as being on James Craig Walk.

both the front and rear elevations. The façades reflect the internal planning of the buildings with larger balconies and lengthened windows to the drawing rooms at first floor level.”

1.28 The Character Appraisal also states: *“The form and appearance of shop fronts make an important contribution to the appearance and character of certain parts of the area. Streets of shops were included from the beginning of the New Town. Many of these shops have survived on the fringes of the central area However, within the central area these early shop fronts have largely disappeared. Victorian and early twentieth century shop fronts incorporated fine and elaborate joinery, becoming more elegant and maximising display space....”*

THE APPLICATION BUILDING’S HISTORY IN ITS CONTEXT

1.29 The application building was built as a five-storey residential tenement in the late 1770s. It formed the bulk of the south-western side of a new opportunistic development called St James Square. The open area of the square approached 70 metres by 45 metres in size. The square was designed by James Craig (1739-95), who had won the competition in 1766 for the design of Edinburgh New Town. The exact role of Craig in the design of the application building itself is unclear. Plans of the time show little design connection between St James Square and the remaining part of the New Town.

1.30 Part of the building was used as a hotel for some time during the 19th century. However, the applicant indicates that most of the lower and upper ground floors across St James Square were converted from residential use to shop units in the 19th century. So the applicant assumes that a number of the lower floor units of 27-31 James Craig Walk were occupied in a similar way. The applicant suggests (from photographs) that the buildings across the square were all altered in a similar fashion providing a consistent retail presentation; external signage was added, frontages were painted but most window openings remained unaltered.

1.31 In the early years of the 20th century, the application building was significantly altered, both internally and externally. The alterations included the removal of the pitched slated mansard roof and its replacement by an attic storey with a flat roof. In addition, the separate blocks were connected up together, timber floors were removed and replaced with new concrete floors on steel beams, internal and external staircases were removed, original interior finishes stripped out, windows replaced and the chimneys reduced in height to suit the new attic storey. The original turnpike stair was retained. The alterations were to enable the building to be used as an annexe to the Sasine Office. That use continued until 2002, when the building was converted to its most recent use, student flats.

1.32 The limited changes to the application building itself during much of the remainder of the 20th century contrasted with major developments immediately to the east. In 1949 “A civic survey & plan for the city & royal burgh of Edinburgh” by Patrick Abercrombie proposed the demolition of St James Square and the insertion of a new road network through the cite centre. Wholesale clearance followed in the late 1960s and early 1970s, leaving the application building and the nearby (relatively unaltered) numbers 23-26 as the only remnants of St James Square. A large area as far as Leith Street to the east saw the development of the St James Centre shopping complex, car parking and a tall office block for the Scottish Office, New St Andrew’s House. That development included lowering the external ground level in the area immediately to the north-east of the application building.

Consequently what had been the lower ground floor level of the application building became its principal entrance level.

1.33 The early 1970s redevelopment was itself the subject of redevelopment proposals in 2008. This time, the proposals included the application building. They resulted in the council granting permission (08/03361/OUT) in June 2009 for redevelopment and refurbishment including demolition works and new buildings to provide a mixed use development comprising retail, leisure and culture, hotel, offices, food and drink uses, residential, and other related ancillary uses, car parking, servicing, access arrangements, provision of new public realm and the refurbishment of the existing department store, detailed approval of siting and maximum height of building blocks, points of vehicular access and egress and the location of pedestrian routes. The 2009 outline permission included a new hotel building at what would form part of a new St James Square located roughly where the original St James Square had been. The permission authorised the raising of the level of the square back to its original level. This latest redevelopment project is called Edinburgh St James. Subject to subsequent approvals, this redevelopment is proceeding and is well towards completion.

1.34 The illustrative [masterplan](#) accompanying the 2008 application identified the intended design approach, with 27-31 James Craig Walk shown as having two levels of retail (at upper and lower ground level) which, the commentary stated, would help the building to complement the reinvention of the square it faces. Sketch plans in the illustrative master plan showed projecting single-storey shop fronts. Although there have been several approvals of details, including listed building consents, no details of the retail frontages at 27-31 James Craig Walk have been put forward for listed building consent until the application now at issue.

THE APPLICATION WORKS IN THEIR CONTEXT

1.35 The application for listed building consent (council reference 20/02527/LBC) that is the subject of this case needs to be seen in the context of the planning permissions, not only for the application building (see below) and the wider Edinburgh St James redevelopment (see above) and listed building consents already granted by the council.

1.36 Several planning permissions are worthy of note. In September 2016, the council granted planning permission (16/03662/FUL) for the change of use of 27-31 James Craig Walk *“from student accommodation to Class 1 (Shops), Class 2 (Financial, professional & other services), and/or Class 3 (Food and Drink) and Class 7/Hotel uses, proposed alterations and ancillary works (as amended)”*. Non-material variations to this were permitted (16/03662/VARY) in November 2019.

1.37 Closely associated with the application that is the subject of this report is planning application 20/02524/FUL. The description of that development was the same as for the 2016 development except for the addition of the words *“erection of shopfronts”*. The main difference from the 2016 scheme was in fact the introduction of the projecting shopfronts that are the main new feature of the listed building application that is the subject of this report (see paragraph 1.44 below). The council’s [decision](#) on that, in September 2020, was to grant planning permission subject to three conditions. These required the submission and approval of a detailed specification of the proposed external materials before work is commenced; the submission and approval of details of the shopfronts paint colour scheme

prior to occupation; and the submission, approval and implementation of the extract flue and ventilation system prior to occupation.

1.38 The intention (in line with the September 2020 planning permission) is that the lower two storeys (lower and upper ground floors) would provide a mixture of Class 1 (shops), Class 2 (financial, professional and other services) and Class 3 (food and drink) within six commercial units. The layout of these floors remains relatively unchanged from the 2016 permission and consent. The lower ground floor units would all be accessed directly from the external pedestrian area to the front of the building which steps and slopes down from the new St James Square. The upper ground floor would be accessed either by new external entrance stairs or via a lift replacing the turnpike stair. Above the commercial units, on the first to fourth floors, would be an apart-hotel, with 39 studios and apartments for longer-stay guests.

1.39 The proposed works that are the subject of this report are described on the [application form](#), dated 23 June 2020, as “*Internal and external alterations, erection of shopfronts and associated works*”.

1.40 The application form also states, and as I saw on my site inspection, that the works applied for were already underway under the terms of the planning permission mentioned in paragraph 1.36 above and listed building consents granted previously (16/03662/FUL (as varied), 16/03663/LBC, 19/04401/LBC and 20/01751/LBC). There are 46 plans for the current application (four of them superseding others during the period when the council had jurisdiction), and these are listed in annex 1 to this report.

1.41 In effect, the applicant now seeks consent for amendments to the previously approved listed building consent 16/03663/LBC. That consent was for “*Internal and external alterations and ancillary works (as amended)*” and was granted in September 2016. It provided for a wide range of works including: the reinstatement of the slated mansard roof; taking down and rebuilding the original chimney stacks to their original height; the amendment of the roof profile and articulation to the rear elevation, including the introduction of dormer windows; the reintroduction of entrance porticos to the reinstated ground level created through raising the St James Square level; the creation of contemporary entrance stairs as part of proposals for the public realm; the restoration of the original fenestration pattern, with Georgian-style six-over-six sash and case windows replacing non-original windows; the provision of discreet ventilation in selected windows on the rear elevation; the introduction of a new lift core; and the removal of the turnpike stair.

1.42 HES did not object to the 2016 proposal. It welcomed the conservation-based treatment. It particularly welcomed the mansard roof replacing the early 20th century sheer-storey extension and the restoration of the original doorpieces, platts and stairs. It noted that internally there was little of interest in the building.

1.43 Revisions to the scheme consented in 2016 were granted listed building consent in November 2019 (19/04401/LBC). The main variations then from the 2016 consent related to door design at the upper ground floor retail unit entrances; the inclusion of glass entrance lobbies; additional vents in new chimneystacks; design amendment of the external entrance stairs, platts and balustrading; changes to the internal layouts of the upper floors; the addition of a shallow services trench beneath the passenger lifts; the relocation of the plant area; an alternative fire exit route; and associated internal layout changes at the lower ground floor. The council received no comments from HES on this proposal.

1.44 The main difference⁴ now proposed from the works previously consented is the proposed installation of four two-storey projecting shopfronts on the main, north-east, elevation. The shopfronts would be additions to the lower and upper ground floors. They would be of a traditional design and use traditional materials. They would extend across 12 of the building's 17 bays, in two groups of four bays each and two groups of two bays each. They are portrayed on some of the application plans, notably those showing the [north-east \(façade\) elevation](#), the [north-east \(St James Square\) elevation](#)⁵ and the [shop front details](#). [Photo-montages](#) are submitted as supporting information.

1.45 The proposed shopfronts would be constructed from quality hardwood. A basic steel frame set in concrete raft foundations would be erected to support the timber construction and fixed back to steel restraints which would themselves be fixed to the existing masonry. This would minimise fixings into the historic fabric. Each shopfront would have a lead-clad finish to its roof, chased into and weather-sealed against the existing masonry. The same detail would be applied down the sides of each shopfront.

1.46 The existing walls would remain behind the new shopfronts. Works would be carried out on these walls at lower and upper ground floor levels, mainly the re-opening of several currently blocked-up original windows and the enlargement of several existing window openings to form new door openings. The interiors of the commercial units would be accessed through consented window and door openings.

1.47 The council provides a copy of the [advertisement](#) of application (with other applications) and a copy of [site notice](#).

⁴ There are also many elements common both to the works previously consented and those that make up the works now in question. As indicated in paragraph 1.40 above, progress on the works common to both sets of proposals was in hand at the time of my site inspection. For instance, the new mansard roof was in place and the turnpike stairs had been removed.

⁵ This shows St James Square at its new proposed level.

CHAPTER 2. THE APPLICANT'S CASE

Introduction

2.1 The applicant's case is contained primarily in the following documents (in chronological order):

- An extract from the illustrative [masterplan](#) accompanying the 2008 application.
- [Planning Statement](#) (June 2020).
- Design & Heritage Statement (July 2020). This is saved as several parts: chapters 1-3 are [here](#), chapter 4 and part of chapter 5 are [here](#), the rest of chapter 5, chapters 6 and 7 and part of Appendix I are [here](#), part of Appendix I and part of Appendix II (which is the Design Statement, July 2016) are [here](#), and part of Appendix II and part of Appendix III (which is the Heritage Statement and Impact Assessment July 2016) are [here](#)
- [Letter](#) to reporter (28 January 2021).

2.2 There are long established aspirations, within the Edinburgh St James proposals, to activate the north-east elevation of the application building through the addition of shopfronts. The principle of the proposed development has also been accepted through previous approvals. The inclusion of the particular shopfronts now proposed should not alter the conclusions reached in the assessment of the previous applications.

2.3 The application building will form one side of the new St James Square, which will be a new retail and leisure destination in the city. So the proposals for the building itself seek to improve its appearance and significance, allowing it to regain its place on one side of a new urban square forming the setting for the new central hotel. The application proposals ensure that the building will respond to its changing context within the city and remain in active and productive use as part of the new retail and leisure quarter.

2.4 The key aspect of the design is the beneficial improvement it brings to the public realm, specifically the new St James Square. There will be new entrances in the spirit of the original building: a set of four new staircases will rise up to new stone doorcases in traditional style providing entry to the upper level retail units; at the same time, landscaped steps will descend to the lower level retail entrances. The shopfronts are important in providing the application building with an inviting and outward looking face, and bringing much needed active connectivity between the building and the new square.

The heritage value of the application building

2.5 The building has medium historical significance as, along with 23-26 St James Square, it is the only surviving part of the former square. It is associated with James Craig, a person of national importance. But Craig's layout for the square did not satisfactorily reconcile it with the geometry of the eastern edge of the New Town.

2.6 The building has low evidential value. Although it provides tangible evidence of the original St James Square, it has been so heavily altered and damaged both externally and internally (particularly at the beginning of the 20th century) that it has almost completely lost

that link, and its recent state says little about the original building. Little of value internally remains. Externally, the third floor attic storey and roof are not original, and the roofline of the original building has been drastically altered; the sash and case windows are not original and are styled on a period later than the original building; the original external steps, platts and entrance porticos have been removed and altered to window openings; chimneys have been lowered; gables have been heavily altered.

2.7 The application building has low architectural and aesthetic value. This is because the early 20th century alterations almost entirely detached it from the public realm, and the changes to the roofline had a negative impact on the building's aesthetic value. The building was further compromised by the changes to the street level in the 1960s and 1970s.

2.8 The building has low communal value: it does not have high significance for the people of Edinburgh and has never had a particularly high profile. The 1970s redevelopment resulted in the loss of St James Square, and the application building became largely obscured from the streetscape of the city and with very little presence in the public realm. The lowering of the external street level at that time resulted in the former basement serving as the ground floor and affected the relationship between the building and the street.

Commercial considerations

2.9 Edinburgh remains an attractive market for retailers, but when considering store acquisitions retailers are now comparing opportunities across Europe. Prior to the inclusion of the now-proposed shopfronts, the applicant's discussions with potential occupiers have *"highlighted the units as having a lack of commercial presence within the new square and has resulted in a reluctance for retailers to occupy them."* Successful rejuvenation of the building and engagement with the new public square would be greatly compromised by vacant units.

2.10 The application building's range of commercial unit sizes creates interest, but the nature of the existing building also causes difficulties: the small windows are unsuitable for display; they are not at eye level; limited signage would result in brands struggling to create an identity; and the uniform stone façade creates a dead frontage. The proposed shopfronts would create additional interest and give opportunities to occupiers to stamp their identities on the building which will bring it to life. From the feedback received *"we do not believe it will be possible to successfully let James Craig Walk to retailers without enhancing the frontage as proposed."*⁶ Conversely, computer-generated illustrations of what is now proposed have been marketed to retailers resulting in immediate offers for the space.

Shopfront design

2.11 As a result of the commercial feedback, the applicant now wishes to include projecting shop fronts to the principal elevation for retail display purposes and to provide the proposed retail units with a distinct public face that addresses the new square. The traditionally styled and sensitively proportioned projecting shopfronts would achieve this while respecting and responding to the special interest of the listed building.

⁶ Commercial statement by consultant Culverwell in Design & Heritage Statement July 2020.

2.12 The Georgian New Town was developed primarily as a residential area. Its retail streets, such as Princes Street and George Street, were not built as such, but have developed in that way over time. St James Square, too, was built as a residential square and the buildings surrounding it, including the application building, were initially residential tenements. However, most of the lower and upper ground floors across St James Square (probably including those at the application building) were converted to shop units in the 19th century, although photographs appear to show that most window openings remained unaltered.

2.13 The design of the shopfronts is intended visually to reflect high-quality examples seen in the New Town, including elements reminiscent of Victorian shopfronts, the style that is most prevalent on Georgian buildings throughout the New Town. Photographs of existing examples demonstrate this.

2.14 Careful attention has been paid to materials, proportions and detailing, and to the composition of the elevation as a whole to maintain a harmonious façade and attractive streetscape.

2.15 The proposed shopfronts would be low-impact in relation to the original building fabric to allow for possible future reversibility. Fixings into the historic fabric would be minimised (see paragraph 1.45 above). The window openings would not be removed or altered: these openings, although not the windows themselves, are one of the few remaining original features of the building. Instead, the new shopfront display areas would be accessed through the retained window openings. Should a change of use back to office or residential occupation be required, the timber shopfronts could be removed and sash and case windows easily inserted directly into the existing openings. This safeguards the building's heritage for the future.

Heritage impact of the application proposals

2.16 The significant alterations proposed in 2016, and now repeated, to the front elevation and roof of the application building will return some of its original character that was lost as a result of the earlier alterations to the building and its setting. In addition, refurbishment of the interiors will generally affect modern fabric and will not destroy the overall understanding of the design and construction of the building. It is accepted that the loss of the turnpike stair is an adverse feature of the proposals, but it had seen numerous interventions to its treads, balusters and handrail, and it had had a painted finish applied to all of its stone surfaces. It was not a rare feature. Its removal has been required to locate a new lift core, which is central to the proposed internal configuration of the building. The 2016 scheme was therefore considered to be beneficial overall. The most beneficial elements were envisaged to be the reinstatement of entrance porticos and the reinstatement of the mansard roof and dormers.

2.17 The heritage impact of the proposed shopfronts is assessed as follows:

“With the light-touch approach suggested, the proposed shopfronts will cause minimal impact to the original fabric of the building. The commercial frontages will not result in adjustment to the original window openings and is therefore a substantially reversible intervention. The proposed shopfronts do not discernibly harm the buildings significance

which lies mainly in its historical association to James Craig and connection to the historic St James Square.

Given the commercial feedback received, it is to be assumed that should a proposal for shopfronts not be included as part of the proposal then the upper ground floor of retail units would remain unoccupied, which would be highly adverse to the heritage asset.

While not an authentic restoration of the original building, the proposed scheme will be beneficial in returning the entirety of the building back into use, and such adjustments to the existing building need to be considered in order to ensure its long term conservation and overall benefit.

The proposal is resonant with many examples of shopfronts found throughout the Edinburgh New Town and would work to positively strengthen the connection to the new square and resolve the issues that have existed since the 1970s which resulted in the building being largely overlooked by the public and its low significance within the local community.

The overall impact of the commercial frontages proposal on the front elevation of the building is a neutral heritage impact.”

2.18 In general terms, the current proposals overall would have a beneficial impact on the listed building and would, on balance, not adversely impact its special interest. With the exception of the removal of the turnpike stair and minor alterations required to attach the shopfronts to the façade, the alterations would generally affect modern fabric only. The proposals are of high design quality and would use materials which are appropriate to the site’s historic context and/or relate to the contemporary design of the new St James Square. The development responds to, and is important for, the proper planning of the area as part of the wider Edinburgh St James development.

Conditions

2.19 In the event of consent being granted, and with reference to PAD’s claim (see paragraph 1.4 above) that the council proposes no conditions to adequately control or safeguard the impact of the works on the application building, it should be remembered that the council imposed three relevant conditions in granting planning permission (20/02524/FUL) for the same scheme that is the subject of this report (see paragraph 1.37 above). It is understood that the council’s standard practice, when applications for listed building consent and planning permission are submitted together as in this case, is to apply any conditions to the planning permission. There is no requirement to duplicate controls. In addition, both applications in this case were supported by a shopfront details [drawing](#) clearly showing the proposed materials, detailing, specifications and number and type of necessary stonework fixings for the shopfronts.

2.20 On the council archaeologist’s recommendation for a condition (see paragraph 3.12 below) attention is drawn to the applicant’s Historic Building Recording & Archaeological Watching Brief [Written Scheme](#) of Investigation (April 2018). This was submitted to the council during its consideration of the application now in question. The council also approved this scheme under planning permission 16/03662/FUL as varied by 16/03662/VARY and listed building consent 19/04401/LBC. Given that works to the listed building are already under way pursuant to these permissions and consent, and the

submitted written scheme met the requirements of the council's Archaeologist, it is unnecessary to apply this condition now.

2.21 HES does not raise issue, in its consultation responses to either the 2020 planning application or the 2020 listed building consent application, with the level of detail provided. It is not clear whether PAD took the points in paragraphs 2.19-20 above into account or what further information would be expected to allow impacts on the listed building to be fully assessed and understood.

Conclusions

2.22 The internal alterations proposed as part of the refurbishment of the application building will not harm our overall understanding of its design and construction. The external alterations, including the new two-storey shopfronts, are the minimum interventions required to bring the building into beneficial use, allow the building to adapt to its new context as part of the prime retail and leisure destination in the city, and are entirely reversible in the future. As a result, it is concluded that the proposals are beneficial overall.

2.23 The proposals would have an acceptable impact on the site's historic context including the conservation area, and would not adversely impact the setting of any listed building.

2.24 The proposals comply with "Historic Environment Policy for Scotland" (2019).

2.25 On the lack of acknowledgement in the council officer's report of the international significance of the location as a World Heritage Site, the proposals have an acceptable impact on the Outstanding Universal Value of the World Heritage Site. However, such issues are more appropriately considered as part of an application for planning permission, as was done here.

CHAPTER 3. THE COUNCIL'S CASE

Introduction

3.1 The council's case is contained in the officer's [report](#) to its Development Management Sub Committee (September 2020). In addition, the council's Archaeology Officer makes [comments](#) on the application, and I refer to them at paragraphs 3.8-12 below.

Listed building

3.2 The proposed shopfronts would change the character of the building from a plain domestic tenement, but this must be considered as part of the wider regeneration now in progress and the building's changing relationship with the new St James Square, hotel and shopping centre. The proposals must also be considered as a whole in terms of the level of change to the building, including the 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. These changes are a significant conservation gain by the scheme, and they align with the aspirations of HES's Managing Change guidance.

3.3 The traditional design of the shopfronts would sit comfortably with the listed building and retain the traditional character of this built heritage asset within the wider area. This would provide a contrast with the contemporary St James Square and create an attractive juxtaposition. The shopfront changes would be reversible and could be removed later if no longer required. The original window openings would be retained, maintaining the original fabric of the building. The inclusion of shopfronts would contribute towards the building's sustainability, securing a long-term future for the building that can adapt to different uses.

3.4 Any harm to the setting of the listed building by reducing its residential appearance or to its relationship with the neighbouring A listed tenement that survives in near original condition has to be seen in the exceptional circumstance that applies here. This exceptional circumstance is the wider redevelopment now in progress, including the formation of a new public square. Therefore the change in character from a domestic tenement to a more commercial orientation would reflect the changing nature of this part of the city and the building's ongoing history. The addition of shopfronts to the building is acceptable in the light of that.

Conservation area

3.5 The reuse of the building will form part of a diverse mix of uses and contribute towards the comprehensive Edinburgh St James redevelopment. The addition of shopfronts would provide visual interest to the building and integrate it with its new surroundings. They would reflect the changing character of this area. The conservation and restoration of the listed building would, overall, enhance the character and appearance of the conservation area and be a significant improvement on its existing condition before the current works commenced. The proposal would comply with local development plan policy Env 6.

The council's conclusion

3.6 The proposals enhance the character of the listed building and the character and appearance of the conservation area. The scheme accords with HES's Managing Change guidance and sections 14 and 64 of the 1997 Act.

3.7 Therefore, as indicated in its [letter](#) of 25 September 2020 to Scottish Ministers, the council proposed to grant listed building consent⁷ subject to no conditions, but with this informative: *"The works hereby permitted shall be commenced no later than the expiration of three years from the date of this consent."*

The council Archaeology Officer's comments

3.8 The application building lies at the core of the World Heritage Site and represents the last significant survival of St James Square designed by James Craig. Accordingly, this site is within an area of archaeological potential. The aim should be to preserve archaeological remains in situ as a first option but, where this is not possible, archaeological excavation or an appropriate level of recording may be acceptable alternative.

3.9 The works will require significant internal and external alterations including the removal of an original staircase, internal stripping, excavation of new basement levels, lift shafts and a new tunnel linking the building with the adjacent Edinburgh St James development. Although the removal of the original staircase is a significant and adverse impact upon the fabric of this historic building it is acceptable in this instance given the consent history of the development.

3.10 The proposed additions of wooden shop fronts are considered to have a significant and potentially adverse impact on the original fabric and understanding of the application building by adding new and prominent architectural details.

3.11 It is recommended that an archaeological historic building survey of the existing building is undertaken prior to and during any alterations and ancillary works, to provide a permanent record of this important historic structure and understanding of its development history. This would continue from and incorporate the results of the watching brief and investigation referred to at paragraph 2.20 above.

3.12 It is also recommended that the following condition is attached in order to fully record this important building and any associated buried remains: *"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."*

⁷ The letter referred to the council's proposal to grant planning permission, but that was clearly an error. As indicated in paragraph 1.37, planning permission has been granted separately.

CHAPTER 4. THE CASE FOR HISTORIC ENVIRONMENT SCOTLAND

Introduction

4.1 HES comments on the application in a [letter](#) to the council dated 30 July 2020. The letter says that two listed buildings are affected: the application building and the Sasine Office to the south-east. HES objects because the introduction of a range of two-storey shopfronts on the 18th century terrace would significantly harm the character and special interest of the listed buildings.

Background

4.2 The application building and numbers 23-26 represent the last surviving side of St James Square, planned and designed by the New Town's architect James Craig. Craig's pared-down classicism relied on proportions and detail and, although now lost, one side of the square introduced Edinburgh's first "palace front", where buildings were designed as a unified composition.

4.3 Although the south-western side of the square has been much altered, it survived the late 1960s demolition of the remaining three sides. However, it was then left awkwardly sited with the lowering of the adjacent public realm. The only original doorpiece remained marooned at first floor level, until it too was removed.

4.4 The documents supporting the 2008 outline planning application for the Edinburgh St James development urged sensitivity towards the current application building. That was achieved by the 2016 consent for the restoration of the original doorpieces, entrance stairs, platts and fenestration, the removal of the sheer storey extension and the restoration of Craig's original mansard roof. This was in conjunction with the proposal to restore the external levels to close to the original level of the square.

4.5 At that stage, HES judged the removal of sections of the original internal walling as acceptable, being balanced by the positive external improvements. The proposed restoration was seen as a major conservation benefit, and HES have raised no concerns over the changing use for the buildings.

Current proposals

4.6 In a pre-application meeting in 2019 HES intimated that it would be unable to support the addition of two-storey shopfronts to the buildings.

4.7 The current shopfront proposals would be significantly harmful to the building's special interest, and are a retrograde step from the 2016 proposals.

4.8 The extent of the alterations proposed is neither necessary nor desirable. Catering uses are proposed for some of the commercial units, and it is suggested that such uses (bar, restaurant or café) would not require the level of advertisement and display space proposed. The block is prominently sited with an open forecourt to the proposed signature hotel, and will undoubtedly benefit from a considerable level of both visibility and footfall.

4.9 Uses that complement the character and special interest of the building should be sought, providing a different offer to the "mall environment" as acknowledged in the

applicant's Design and Heritage Statement. As well as display and advertisement from within the units, there is scope for sensitive signage, hanging signs, free-standing panel signs and the use of feature lighting. Several retail and catering units operate with Georgian façades in Edinburgh without the need for shopfronts.

4.10 The shopfronts proposed, which are not traditional, but rather a timber and glazed screen placed over the elevations, would harm the special interest of the buildings which, despite alterations, still have a recognisable character, retaining all their original façade openings (with only the former doors changed to windows). The shopfronts would not retain the Georgian heritage of the building, as the chosen form of the shopfronts is from a much later historical period and approach to shopfront design. The works would harm our understanding and experience of the block and introduce an artificial interpretation of its history. It would also differentiate the block from its category A listed neighbour at numbers 23-26, which survives in near original condition.

CHAPTER 5. THE CASES FOR OTHER THIRD PARTIES

5.1 Other third parties' representations can be found [here](#).

The Architectural Heritage Society of Scotland.

5.2 The loss of the main 18th century curved stair would contravene the council's "Guidance on Listed Buildings and Conservation".

5.3 The principal façade of the originally domestic townhouses here should be respected and protected. The introduction of projecting shopfronts over two levels would not do that, as it would drastically alter the building's appearance and therefore its historic importance.

5.4 The proposals conflict with policies Env 4 and Env 6 of the local development plan.

Mr S Elliot

5.5 The design is not in keeping with the area. In addition, bringing shoppers closer to St James Square reduces the likelihood of maintaining a level of privacy in the communal garden.

Mr A C O Jack.

5.6 The quaint proposed shop fronts might enhance the setting; they would harmonise the changes in levels of the tenement; they would cover up the unattractive condition of some of the masonry walls at the lower levels; and they might increase the rental income and the class of tenant for the redeveloper. However, they would dramatically change the Georgian appearance of the south-western side of the original St James Square. They would apparently breach the historic building line from the General Register House through to 23-26 St James Square. They would reduce the access to the building for disabled people.

CHAPTER 6. REPORTER'S ASSESSMENT AND RECOMMENDATION

6.1 The reason for this case being called in for Ministerial decision is the potential impact of the proposed works on national historic environment policies. I indicate those policies at paragraphs 1.6-16 above. Other policies, as outlined at paragraphs 1.17-21 above, are consistent with the national policies.

6.2 Emerging from the policy background are several clear needs:

- (a) to care for the application building in view of its B listing, and to have special regard to the desirability of preserving it or its setting or any features of special architectural or historic interest which it possesses;
- (b) to understand the building's significance, so that decisions can focus on its qualities;
- (c) to preserve or enhance the character or appearance of the New Town Conservation Area, and to protect the Outstanding Universal Value of the World Heritage Site;
- (d) to ensure that the understanding of the historic environment, and its enjoyment and benefit, are secured for the future;
- (e) to manage changes to the building sensitively, so that opportunities for enhancement are identified where appropriate, unavoidable detrimental impact minimised, and alternatives explored; and
- (f) to avoid unduly constraining the building's alteration if it is to remain in beneficial use; to support proposals to keep it in use as long as they do the least possible harm, as keeping a listed building in use helps build successful places.

6.3 It seems to me that the building's significance is well understood. It originated as one side of a formal Georgian residential square and is strongly associated with James Craig, a figure of national importance who was crucial to the development of Edinburgh's New Town. In my view that significance was muted to a degree from the beginning by the design disconnection between St James Square and the extensive formal layout only a short distance to the west.

6.4 Subsequently, further significance was lost in two main stages. The first was at the beginning of the 20th century when the application building was much altered when it became part of the nearby Sasine Office, including the loss of the original mansard roof and many internal features. The second subsequent loss was the demolition of the buildings on the other three sides of St James Square in the 1960s/1970s to make way for commercial development (St James Quarter). That left the already much-altered application building (to be further altered when it was converted to student flats some 30 years later) as something of a backwater largely unrelated to the development around it.

6.5 Given that context, it seems proper to me to regard the current redevelopment of the St James Quarter to form Edinburgh St James, and particularly the inclusion of a rehabilitated application building within the scope of the overall proposals, as something of a rescue operation for the building. The rehabilitated building itself will have a new lease of life as part of the new commercial entity, Edinburgh St James. In addition, the approved overall proposals include a significant pedestrian space in front of the application building

which will link it functionally and spatially with the entirely modern elements of Edinburgh St James.

6.6 Although the focus of this case is the proposed provision of shopfronts, it must be remembered that the application that is before Ministers for determination includes a very wide range of proposed works, most of which already have listed building consent. In seeking to provide an overall picture of the proposed changes to the building, it needs to be mentioned that some of the works that have been consented may rightly be regarded as having an adverse effect. The most notable example of this is the loss of the building's turnpike staircase, although the applicant makes a good case for regarding that loss as acceptable. On the other hand, a wide range of very clear benefits is proposed, including the reinstatement of the mansard roof, the rebuilding of chimney stacks to their original height, the reintroduction of entrance porticos and the restoration of the original fenestration pattern.

6.7 The material objections to the varied proposals now in question focus overwhelmingly (and completely in the case of HES's objection) on the proposed shopfronts. HES objects to the two-storey shopfronts as proposed. But its suggestion regarding "*other less harmful options*" such as sensitive signage and the use of feature lighting seems to imply a concern with any kind of shopfront here.

6.8 Although HES's concern was signalled in 2019, the applicant says that aspirations to activate the north-east elevation of the application building through the addition of shopfronts are long established within the Edinburgh St James proposals. That is correct, as the illustrative masterplan with the 2008 outline application for the overall Edinburgh St James development included sketches with shopfronts. But these sketches were not part of any formal proposal, they were not part of any application for listed building consent (or planning permission), and no listed building consent has so far been granted for any shopfronts here.

6.9 The question therefore remains whether the present formal proposals are justified for this particular building within the national policy context. On the one hand, notwithstanding the applicant's remarks, there is no firm evidence that the application building has ever had shopfronts of any kind. On the other hand, by no means all of the existing shopfronts in the Georgian New Town are indications of an initial retail use. Shopfronts have clearly been added at various times in various parts of the New Town. The application works would do just that.

6.10 No objection has been explicitly made with specific regard to the two-storey character of the proposed shopfronts. That character would in any case be visually modified to a degree by the raising of the ground level outside the application building, so that the lower portion of the shopfronts would only be seen in very close views. In addition, the shopfronts' two-storey character would not in my view be seriously at odds with the vertical emphasis of the building's frontage here.

6.11 As to HES's concern that the proposed shopfront design is from a much later historical period and approach, there are very few examples of Georgian shopfront design to be seen in the New Town. The council's conservation area character appraisal refers to the New Town's early shopfronts having largely disappeared; the appraisal includes positive remarks about Victorian and early twentieth century shop fronts there. The design in this case does indeed reflect that later period, but that would not make it out of character with

the context of the New Town and the conservation area. It seems to me that no case has been substantiated against the proposed shopfronts on the basis of their intrinsic design.

6.12 I note Mr Jack's point about the apparent breach, by the proposed position of the shopfronts, of a historic building line from the General Register House through to 23-26 St James Square. However, it seems to me that regard for building lines is a useful design tool in only some circumstances. It is difficult to apply the concept in this case, where the General Register House and 23-26 St James Square are set at different angles.

6.13 My remarks in paragraphs 6.9-12 above do not combine to make a strong case against the proposed shopfronts. It seems to me that four additional points tend to put the balance of the overall argument on the side of allowing the proposed works to proceed.

6.14 First, the proposed shopfronts would not involve any irreversible harm to the existing principal façade of the application building. They would be attached only minimally to the wall behind them. They would be capable of being removed and the façade of the building then fully revealed.

6.15 Secondly, the commercial evidence as presented is quite stark, pointing on the one hand to the impossibility of successfully letting the application building to retailers in the absence of the proposed works and the attraction on the other hand of the commercial units behind the shopfronts if the works were to proceed. No details of this contrast are given, and I have not probed the matter with the applicant as considerations of commercial confidentiality would undoubtedly limit what can be revealed. I do not support the proposition that the rehabilitation of the application building is ensured if the proposed shopfronts have to be omitted. However, some exploration and explanation of other possible alternative design solutions in the face of the commercial difficulties would have been useful. But I accept that Edinburgh is competing with international opportunities, and the risk of having unlet units in a prominent location within an area of major redevelopment is not one to be taken lightly.

6.16 Thirdly, the proposed shopfronts have to be seen in the context of the other changes proposed for the building. In my view, collectively, those other changes represent positive heritage impact.

6.17 Fourthly, I turn to the application building's setting. It is important to remember that the application building adjoins another listed building (the Sasine Office) to the south-east with a further free-standing listed building (23-26 St James Square) only 10 metres or so to the north-west. The heading to HES's objection says that the proposals affect the Sasine Office, but it does not pursue that particular concern. Apart from its concern for the application building itself, it instead fears for the effect of the proposals on numbers 23-26.

6.18 Particularly from my site inspection, my perception is that the proposed shopfronts would form a significant element in views of all three buildings referred to in paragraph 6.17 above from those locations on James Craig Walk where such views can be obtained. But those locations will be few. That is partly because the wall of the Sasine Office facing James Craig Walk is at an angle to the wall of the application building, but more so because the new buildings of the Edinburgh St James development are located sufficiently far forward to limit the number of viewpoints of all three buildings together.

6.19 There is a further element of setting that requires mention. The commercial use of the application building has been accepted through the planning permissions granted. The building is itself part of the Edinburgh St James development. From my site inspection, I see the proposed shopfronts having the effect of drawing in the building, visually, to sit functionally within the scope of that wider development. In this context, I see the consistency between function and visual perception as a benefit. There would undoubtedly be a visual contrast with the substantially unaltered form of the A-listed numbers 23-26 only 10 metres or so from the application building. But to regard that as harmful would, it seems to me, be too narrow a view. Instead, my assessment is very much like the council's – that the wider redevelopment now in progress, including the formation of a new public square, provides an exceptional circumstance that outweighs that harm.

6.20 I can summarise by indicating the extent to which the present proposals meet the policy needs expressed in paragraph 6.2 above.

6.21 On point (a), my view is that the process of bringing the B-listed application building into retail, food and drink use and hotel use as allowed in planning permissions and listed building consents since 2016, and as proposed in the listed building consent application now in question, already includes a substantial degree of care. The heritage impact assessments have been carried out carefully. They represent the special regard that needs to be given to the desirability of preserving the building's features of special architectural or historic interest. Apart from the loss of the turnpike stair, very little of significance is now being lost as a result of the internal works: the major losses in that respect were over a century ago. Externally, the works from the first floor upwards provide very significant benefits in relation to the building's listing. Those now proposed at upper and lower ground floor levels in the form of the shopfronts have precedents in the Georgian New Town. In addition, I see the reversible character of the latter works (with the shopfronts having minimal physical impact on the existing fabric behind them) very much as a benefit. The shopfronts would help to draw the application building, both functionally and visually, into the scope of the new development.

6.22 Point (b) in paragraph 6.2 above requires the building's significance to be understood, so that decisions can focus on its qualities. The building is a remnant of 18th century town planning. That is of significance, but its original planning context – St James Square – disappeared 50 years ago. It seems to me that the decisions made since 2016 have focused properly on the building's qualities, and that the current application in question is in line with that.

6.23 Point (c) in paragraph 6.2 above concerns the merits of the proposed works in the contexts of the conservation area and the World Heritage Site. Material harm to the building, its features or its immediate setting would need to be demonstrated if there were to be material harm in the wider contexts. Bearing in mind my remarks at paragraph 6.19 above, I do not believe such harm is demonstrated. Moreover, post-Georgian shopfronts on Georgian buildings are numerous within the conservation area and the World Heritage Site, and the well-designed shopfronts here would represent an acceptable further example of that.

6.24 Point (d) requires that the understanding of the historic environment, and its enjoyment and benefit, are secured for the future. The evidence put to me is that the proposed shopfronts now in question are a crucial part of ensuring that the application building's future is secured. That might be an over-statement, but to say that the

conversion and adaptation of the application building already ensures its continued use with or without the proposed shopfronts also goes too far. A refusal in this case would be likely to lead, at least, to a significant delay in the application building coming fully back into use. This would amount to delay in the complete building yielding enjoyment and benefit, and that could present an image problem for the nearer parts of the Edinburgh St James development.

6.25 I have no doubt that the works previously consented represent a process of managing changes to the building sensitively, with opportunities for enhancement identified where appropriate and unavoidable detrimental impact minimised (point (e) in paragraph 6.2 above). I accept, too, that the current application can be regarded as part of the same process.

6.26 Accepted policy also requires alternatives to be explored (point (e) again). In this case we have the commercial evidence about the difficulty of letting the commercial units without the proposed shopfront, and the prospect of immediate offers if consent is granted. That is something of an all-or-nothing choice. The only other design alternative appearing in evidence is the single-storey shopfronts of the 2008 illustrative master plan. That there is no evidence of an explicit examination of design alternatives seems to me an omission in the applicant's case that ought to have been avoided.

6.27 Point (f) is about avoiding unduly constraining a building's alteration if it is to remain in beneficial use, with proposals to keep it in use being supported as long as they do the least possible harm. To my mind, this puts point (e) in context. Although it might have been preferable to have seen the explicit consideration of design alternatives, I find it difficult from the evidence to identify harm in the design that is put forward. The evidence, is that that design should ensure, with the other elements of the application in question, that the building remains in beneficial use.

6.28 Overall, in terms of the requirements of policies HEP1, HEP2 and HEP4 in "Historic Environment Policy for Scotland", it seems to me that a favourable view of the shopfronts is informed by an inclusive understanding of the breadth and cultural significance of the historic environment of this part of Edinburgh, that that understanding would be secured by the application proposals for present and future generations, and those proposals overall incorporate a number of opportunities for enhancement and minimise detrimental impact. A consent would be consistent with the duties imposed by sections 14(2) and 64 of the 1997 Act.

6.29 Two other matters raised by third parties – privacy and disabled access – are not material to considering whether listed building consent should be granted.

6.30 On that basis I conclude that listed building consent should be granted.

CONDITIONS AND INFORMATIVES

6.31 As indicated at paragraph 3.7 above, the council proposed to impose no conditions on a consent in this case (although its archaeologist took a different view – see paragraph 6.33 below). In addition, as the applicant points out, HES has raised no concerns in this respect. But two potential conditions still need to be considered.

6.32 The first relates to PAD's comments about the adequacy of control over the impact of the works on the application building. I agree with the applicant's view about those comments. The council's planning permission 20/02524/FUL relates to exactly the same proposals in the listed building application case in question here, and the conditions on that permission require the approval of the detailed specification of all the proposed external materials and details of the paint colour scheme of the shopfronts. As the applicant also points out, the application plans in this case include a shopfront details drawing showing the proposed materials, detailing, specifications and number and type of stonework fixings. Like the applicant, I see no need to duplicate the conditions for what is the same project, and that, together with the details already submitted, seems sufficient.

6.33 The second potential condition arises from the council archaeologist's recommendation for a condition relating to archaeological work. The applicant's reference in response to this to planning permission 16/03662/FUL is a fair one: this permission included a condition requiring the implementation of an approved programme of archaeological work. There is nothing to suggest that the applicant's written scheme (April 2018) does not accord with that condition.

6.34 The applicant also refers to planning permission 16/03662/VARY and listed building consent 19/04401/LBC. These are different schemes and no condition ties the archaeological work to the revised scheme. The scheme now in question is another revision. Having said that, I am not satisfied that it is necessary to impose a condition relating to archaeological work. This is because the existing controlled archaeological work addresses the existing building in a comprehensive manner, and there is no evidence that the scheme changes since 2016 (including the changes included in the application now in question) raise new archaeological issues. Again, there would be unnecessary duplication if such a condition were to be repeated in this case.

6.35 The council proposed to include an informative about the works needing to be commenced within three years if it had been issuing a consent notice in this case. However, many of the works included in the current scheme were also included in previous consents, and work has already commenced. An informative on this point therefore seems superfluous.

6.36 For these reasons, if consent is to be granted, I perceive no need for any condition or informative.

RECOMMENDATION

6.37 I recommend that listed building consent be granted.

Mike Croft
Reporter

Annex 1. Application plans

Location Plan

Proposed Site Plan with Boundary L(PL)000

Existing

Existing Lower Ground Floor Plan L(PL)010
Existing Upper Ground Floor Plan L(PL)011
Existing First Floor Plan L(PL)012
Existing Second Floor Plan L(PL)013
Existing Third Floor Plan L(PL)014
Existing Fourth Floor Plan L(PL)015
Existing Roof Level Plan L(PL)016
Existing Section A-A L(PL)020
Existing Sections B-B & D-D L(PL)021
Existing North East Elevation L(PL)030
Existing South West Elevation L(PL)031
Existing North West & South East Elevations L(PL)032

Downtakings

Downtakings Service Link Floor Plan L(PL)109
Downtakings Lower Ground Floor Plan L(PL)110
Downtakings Upper Ground Floor Plan L(PL)111
Downtakings First Floor Plan L(PL)112
Downtakings Second Floor Plan L(PL)113
Downtakings Third Floor Plan L(PL)114
Downtakings Fourth Floor Plan L(PL)115
Downtakings Roof Level Plan L(PL)116
Downtakings Section A-A L(PL)120
Downtakings Sections B-B & D-D L(PL)121
Downtakings North East Elevation L(PL)130
Downtakings South West Elevation L(PL)131
Downtakings North West & South East Elevations L(PL)132

Proposed

Proposed Basement Tunnel Floor Plan L(PL)209
Proposed Lower Ground Floor Plan L(PL)210
Proposed Upper Ground Floor Plan L(PL)211
Proposed First Floor Plan L(PL)212A (superseded L(PL)212)
Proposed Second Floor Plan L(PL)213A (superseded L(PL)213)
Proposed Third Floor Plan L(PL)214A (superseded L(PL)214)
Proposed Fourth Floor Plan L(PL)215A (superseded L(PL)215)
Proposed Roof Level Plan L(PL)216
Proposed Section A-A L(PL)220
Proposed Section B-B L(PL)221
Proposed Section C-C & D-D L(PL)222
Proposed North East (Façade) Elevation L(PL)230

Proposed North East (St James Square) Elevation L(PL)231
Proposed South West Elevation L(PL)232
Proposed North West & South East Elevations L(PL)233

Details

Sash & Case Window Details A(PL)250
Sash & Case Window Elevations A(PL)251
Shopfront Details A(PL)252

Landscaping

Public Realm: James Craig Walk Zone 6 – Landscape Levels
ESJ-OPE-ZZZ-SE6-DR-LA-LG102
Rev C
Public Realm: James Craig Walk Zone 6 – Landscape GA
ESJ-OPE-ZZZ-SE6-DR-LA-LS102
Rev C