



Your Ref: **13/01834/LBC** Our Ref: **1349**
Subject: **Material change to existing listed building consent (12/03241/LBC) including to alter floorplate positions at upper level and partly rebuild facade.**
3-6 St Andrews Square
Edinburgh
EH2 2BD
Date: **21-Jun-13**

the
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Scottish Charity No.
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The Trust wishes to **object** to this application for the substantial demolition of a Category B-listed building in Edinburgh's New Town Conservation Area and the World Heritage Site.

The Trust is disappointed and concerned to see this application described as a 'material change' to an existing consent, when quite clearly what is being described here is the demolition of the building to ground floor slab level and the cladding of a new building in the existing facade.

Historic Scotland defines demolition as "the total or substantial demolition of a building. This definition can include the demolition of a building behind a retained facade but does not include the demolition of part of a building, e.g. an extension or a shopfront."

What is being proposed in this case does not even go so far as to retain the facade in-situ, and so with only a tiny fraction of the building being retained or reinstated we must insist that this application is assessed and decided as an application for demolition. The description of the application as it currently stands is misleading.

Decision makers should therefore apply the SHEP tests for demolition: "applicants will be expected to provide evidence to show that:

- a. the building is not of special interest; or
- b. the building is incapable of repair; or
- c. the demolition of the building is essential to delivering significant benefits to economic growth or the wider community; or
- d. the repair of the building is not economically viable and that it has been marketed at a price reflecting its location and condition to potential restoring purchasers for a reasonable period."

The Trust does not feel that this application meets the SHEP tests for demolition of a listed building. The building's special interest is clearly still intact and isn't in dispute, and there has been no suggestion that the building is incapable of repair. Equally the applicant has not proved that repair would not be economically viable (apart from that the current specifications do not meet the aspirations of the chosen market) or that the building has been marketed to an alternative potential restoring purchaser. As for test c, this really only applies in exceptional circumstances related to major infrastructure projects, where developments of national or regional significance





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cannot be realised without the demolition of the building; this is clearly not the case here.

The Trust would urge the Council to consider the implications of the decisions that have been made about 4 and 5 St Andrews Square. These buildings are historic facades attached to 1970s office buildings behind; it is now acknowledged that, having lost their interiors, these facades have lost some value. Taking the plan away from the facade often renders the facade meaningless, and this will be compounded in this case where the new floor levels do not correspond to the facade treatment. This loss of a meaningful relationship to the interior has been used as justification for the total demolition of No's 4 & 5, with David Leslie stating in a letter to Councillor Rankin in October 2012 that "the quality and integrity of these buildings had been so prejudiced by previous development that their retention was not justified." (CEC ref VIP/DRL/NAJ/SR476249/mb). Allowing the building to be reduced to its facade will therefore undoubtedly prejudice the long-term viability of the remaining historic fabric, and if there were to be an application to demolish the retained facade in the future, the Trust believes that the Council would have difficulty making a robust case for its retention.

In summary, The Trust feels that the removal of the associated plan form of 6-7 St Andrews Square and the reinstatement of the facade on a new building would lead to the retained facade, and therefore the listed building, losing its special architectural and historic interest. This is contrary to Policy ENV4 of the Edinburgh City Local Plan. Scottish Ministers' Historic Environment Policy states that demolition of a listed building should always be a last resort, and the SHEP tests are used to ensure that all other avenues have been pursued before the decision is taken to demolish. This application does not provide sufficient justification for the demolition of a listed building.

The Trust is committed to promoting well-designed, good quality, contemporary architecture while protecting and enhancing our historic built environment; we fear that this application does neither well. The misleading description of the application is a major concern, and allows the applicant to avoid making a robust case for the demolition of this listed building within a conservation area and a World Heritage Site.

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To Stephen Dickson, City of Edinburgh Council
cc Historic Scotland
Cockburn Association
AHSS

