

# Development Management Sub Committee

Wednesday 3 September 2014

**Application for Listed Building Consent 12/04007/LBC  
At Napier University Craighouse Campus, Craighouse Road,  
Edinburgh**

**Proposed conversion of existing listed buildings at New  
Craig , Queen's Craig, East Craig, Bevan Villa, South Craig,  
Craighouse Lodge, Old Craighouse to form residential  
properties, including extension at South Craig and  
demolition of Boiler House (as amended).**

**Item number** 3.1(b)

**Report number**

**Wards** A09 - Fountainbridge/Craiglockhart

## Summary

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The proposals comply with the development plan and non-statutory guidance. They will not adversely affect the character of the listed building, its setting or the character and appearance of the conservation area. The case for demolition of the Boiler House is accepted. The proposals will help ensure the long term, sustainable survival of these significant listed buildings.

## Links

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[Policies and guidance for this application](#)

LPC, CITE2, CITE3, CITE4, CITE6, NSG, NSLBCA, OTH, CRPCHI,

# Report

## **Application for Listed Building Consent 12/04007/LBC At Napier University Craighouse Campus, Craighouse Road, Edinburgh**

### **Proposed conversion of existing listed buildings at New Craig , Queen's Craig, East Craig, Bevan Villa, South Craig, Craighouse Lodge, Old Craighouse to form residential properties, including extension at South Craig and demolition of Boiler House (as amended).**

#### **Recommendations**

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1.1 It is recommended that this application be Granted subject to the details below.

#### **Background**

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##### **2.1 Site description**

The application property is composed of a series of individual listed buildings set within the larger landscape setting that is Easter Craighouse Hill, one of the "seven hills" of Edinburgh. The site is steeply sloped and is generally open and grassy at lower levels and wooded higher up. The existing listed buildings which are the subject of this application include Old Craig which is A listed (reference number 28046, listed on 14 December, 1970) and a series of Victorian A listed buildings listed separately (reference number 27736, listed on 28 August, 1979). All the buildings have most recently been used by Napier University.

The Learning Resource Centre, an unlisted modern building, lies to the south of the listed buildings, Bevan and South Craig.

The listed buildings include:

##### Old Craig

Old Craig dates from 1565, with later additions, and is a three storey with attic harled L plan building initially built as a tower house. It was modified in the 19th century by Sidney Mitchell, the architect of the other listed buildings on the site. Part of the original walled gardens remains to the south.

##### The Victorian buildings

The other listed buildings on the site are grouped together in one listing as they were all built from 1899 to the design of Sidney Mitchell as a mental hospital to the specification of William Clouston, a pioneer in the treatment of mental illness.

These buildings include the main hospital block which is New Craig, as well as Queen's Craig to the west and a series of pavilion buildings in a line to south which look out over the sloped open grassy area and include South Craig, Bevan, and East Craig. A small lodge house is to the west on the boundary with Craighouse Road. A boiler house is to the north of New Craig and lies lower down the slope than New Craig. These buildings are sandstone with slated roofs and were designed in the Free Renaissance style.

### New Craig

New Craig is a massive, towered and gabled picturesque building with a steeply pitched roof that steps down a sloping site, dominating the site and other buildings. It is predominantly three storey with dormerheads, basements and towers and can be seen from both near and distant views. It contains the Great Hall and a series of rooms with remarkable interiors. On its northern elevation at the level of the rear service lane the Boiler House Annex is an extension that is historic, but not original to the initial building of New Craig.

### Queen's Craig

Queen's Craig sits to the west of New Craig and is the least conspicuous building in views into the site. It is the second largest listed building after New Craig, being predominantly a single storey structure with a basement except for the western section which is a two storeys with an attic.

### East Craig

East Craig is the first in a series of three villa buildings that run south of New Craig and across the top of the open space. It is a single storey structure with basement and attic levels. It has a non-original modern extension on its south elevation.

### Bevan

Bevan is the next villa building running south after East Craig. It presents a symmetrical elevation overlooking the open space and the city beyond and is a two storey structure with basement and attic levels.

### South Craig

South Craig is the most southerly villa building. It is a two storey structure with basement and attic levels. It also overlooks the grassy open space and has views of the city.

### The Lodge House

This building is located by the gatepiers on Craighouse Road. It is a small single storey building with attic accommodation.

### Boiler House

This building is not specifically mentioned in the list description but is listed by virtue of being a historic structure that is within the curtilage of the listed buildings.

It was built to provide heat to New Craig via services under the rear road that runs north of New Craig. From this road, it presents a single storey structure with a prominent pyramidal roof adjacent to a long stretch of corrugated metal roof to the east. It is set into the north facing slope and from the south the building is approximately two storeys high. It has been redundant as a boiler house for a number of years and is in a poor state of repair.

There are also listed gates and gate piers at the top of Craiglea Place and adjacent to the lodge house.

Originally these buildings were connected by a series of underground tunnels. Access to the tunnels has been blocked for a considerable time and the tunnels have not been maintained. It is understood that many of them are now filled in.

The Victorian buildings designed by Sidney Mitchell are remarkable for their external and internal design and their relationship to the landscape. The 19th century buildings were designed to give the appearance inside and out of a lavish hydropathic hotel establishment rather than a hospital. They were designed "in the round". Although each of them has a principal elevation, all elevations are highly designed and conceived. The Historic Scotland list description notes that "the buildings are set in superb landscaped hilltop site, still completely unspoiled either by later accretions or more modern buildings". The buildings were sited on Easter Craiglockart Hill because the larger landscape setting was integral to the restorative and healing role of the hospital.

With the exception of Queen's Craig and New Craig, the buildings are currently on the Buildings at Risk Register. The Boiler House is rated "high risk", East Craig is at "moderate risk" and Old Craig, Bevan, South Craig and the Lodge House are at "low risk".

This application site is located within the Craiglockhart Hills Conservation Area.

## **2.2 Site History**

There were several applications in the 1990s for conversion to Napier University.

13 September 2001 - an application for the development of a new arts faculty building and minor works to existing 'A' listed building was withdrawn (application reference: 01/01435/FUL).

24 September 2001 - an application for the development of a new arts faculty building and minor works to existing 'A' listed building was withdrawn (application reference: 01/01435/LBC).

24 May 2002 - listed building consent was granted for minor works to basement area of New Craig in conjunction with development of new arts facility building (application reference : 01/04599/LBC).

26 June 2007 - planning permission was granted for the development of a new arts facility building, new surface car park and minor works to existing 'A' listed building (application reference: 01/04599/FUL).

19 September 2012 - an application for the modification of clause (fourth) and clause (seventh) of the legal agreement relating to application no. 01/04599/FUL was withdrawn (application reference: 12/02261/OBL).

22 November 2012 - permission was granted for the modification of clause (fourth) and clause (seventh) of the legal agreement relating to application no. 01/04599/FUL (application reference: 12/03397/OBL).

There have also been several applications for minor works relating to the operation of the university estate.

### Parallel applications

Application for the proposed change of use and conversion of existing buildings from university campus to residential and construction of new build residential, together with ancillary development, public realm, utilities infrastructure including access roads, car parking and landscaping is running in parallel with this application (application reference: 12/04007/FUL).

Application for the demolition of Learning Resource Centre Building is running in parallel with this application (application reference: 12/04007/CON).

## **Main report**

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### **3.1 Description Of The Proposal**

It is proposed to convert the listed buildings on this site to form residential flats and houses. The current scheme has been amended from what was first submitted.

It is proposed to form 64 dwellings within the listed buildings that exist on this site and this will include a mixture of housing types.

The breakdown of units is as follows:

#### Old Craig:

Single dwelling  
- 8 bedrooms

#### Lodge:

Single dwelling  
- 1 bedroom

#### Bevan:

Three flats  
- One 2 bedroom  
- One 3 bedroom  
- One 6 bedroom

#### South Craig:

Three flats  
- One 3 bedroom  
- Two 4 bedroom

### East Craig:

Two flats

- Two 4 bedroom

### Queen's Craig:

Ten flats

- Three 1 bedroom
- Four 2 bedroom
- Three 3 bedroom

### New Craig:

Forty four flats

- Four 1 bedroom
- Seventeen 2 bedroom
- Eight 3 bedroom
- Fourteen 4 bedroom
- One 5 bedroom

The listed buildings will accommodate 26 wheelchair accessible units.

The proposed alterations are as follows:

### Old Craig:

The building will become one single dwelling with its own garden grounds within the former walled garden. Proposed physical alterations are minor. Internally, some non-original partitions will be removed and some new partitions formed to create bedrooms and en-suites. A kitchen will be formed on the first floor. Externally a ramp to the exterior will be removed. An enclosed courtyard will be formed to the north-east of the L shaped plan.

### Lodge:

The lodge will form a single one bedroom dwelling with minimal alterations including the formation of a kitchen at ground floor and the removal of an external ramp.

### Bevan:

Bevan Villa will be horizontally subdivided to form three flats, one on the lower ground level, one on upper ground level and one on first and second floors. A new entrance stair and platt will be formed to the upper flat adjacent to the existing entrance to the upper ground level flat to the rear and a new stair will be formed internally to access the upper flat. A door will be formed from a window to access the lower ground floor flat. Internally a lift and some minor partitions will be removed. The flats will have gas central heating and balanced flues will be required to vent through external walls.

### South Craig:

South Craig will be subdivided both horizontally and vertically to form three flats. The southern half of the building will form a dwelling over three levels.

One flat will be formed on the lower ground floor and upper ground floor of the northern half of the building and a further flat will be formed above on first and second levels. A non-original stair and lift will be removed and a new stair formed to access the upper flat. A porch extension will be built at the bottom of the stair to the rear of the building. At first floor level a terrace on an existing flat roof will be formed and wrought iron railings erected to form a balustrade. Internally some partitions will be removed and new partitions formed. The flats will have gas central heating and balanced flues will be required to vent through external walls.

#### East Craig:

The building will be subdivided to form two flats, one on part of the ground floor and one over three levels, lower ground, ground and first floor. A non-original extension and ramp will be removed on the south elevation. A non-original stair that is currently housed in a dormer extension will be replaced by a new stair in a new dormer extension of approximately the same footprint. A new entrance will be formed on the west elevation to access the ground floor flat in a location where there is an existing stair to one of the tunnels between buildings. The lean-to flat roof covering the tunnel in this location will be removed and the tunnel filled in. Internally some partitions will be removed and new ones erected.

#### Queen's Craig:

This building will be subdivided both horizontally and vertically. There will be one flat at lower ground floor level, five at ground floor level (one of which is accessed from an entrance at lower ground floor level), two flats on the first floor and two on the second floor. Some entry doors will be formed in window openings. Internally the sound proofing that Napier University has installed in many of the rooms for its use as the music department will be removed. Non-original stairs in the central corridor will be removed and the stage will be removed in the former snooker room in Apartment 4. Some partitions will be removed and others added. In order to meet requirements for fire and acoustic separation between apartments, double skin partitions with internal cavities need to be constructed between units. The flats will have gas central heating and balanced flues will be required to vent through external walls. Access to the tunnels will be blocked off.

#### New Craig:

New Craig, as the largest of the buildings on the site, will be converted to house 44 flats. The largest space in the building, which is the Great Hall, will not be converted and will be in shared ownership with all the other occupants of the development.

In order to form the residential flats, the building will be subdivided both vertically and horizontally, with many flats spanning more than one floor. The scheme makes use of existing staircases and lifts although there will be the installation of an additional lift to access the flat that is being created in the tower. The nature of the sub-division with more than one flat per wing necessitates the construction of double skin subdividing partitions for acoustic and fire separation.

Some windows will be converted to doors to provide individual entrances to flats. Access to the tunnels will be blocked off. Unlike the other listed buildings on the site, New Craig lends itself to a system of common flues which enables ventilation from each flat to be grouped in a series of shafts that ventilate out through the roof. This minimises the need for balanced flues through the exterior walls but there will be traditionally designed housing for the ventilation as they exit through the roof. The exception to this system will be the north wing where this system cannot be accommodated and balanced flues through the walls will be required.

At roof level it is proposed to install new rooflights where flats are proposed in the roof space.

It is proposed to remove the Boiler House Annex in order to increase the room for the road to the rear and to facilitate construction of new build on the Boiler House site.

#### Boiler House:

The boiler house, on the other side of the road from New Craig, will be demolished to make way for new build. Historically it would have served New Craig via services under the road but has now been redundant for a number of years.

#### Boundary Walls:

At the current, non-original front entrance to the site, which lies to the north of the lodge house gates, the modern curved entry will be modified to include gate piers and railings.

#### Supporting Statements

The following documents have been submitted in support of the application:

- Design Statement Listed Buildings, Document 1 (November 2012)
- External Alterations; Photographic Record, Document 2 (November 2012)
- Internal Alterations; Photographic Record, Document 3 (November 2012)
- Internal Alterations; Photographic Record, Document 4 (November 2012)
- Design Statement Listed Buildings, Document 5 (November 2012)
- Conservation Plan (November 2012)
- Proposed Removal of Boiler House; Supporting Statement and Photographs. (February 2013)
- New Craig. Proposed Alterations to North Wing. Supporting Statement and Photographs (January 2014)

These documents are available to view on the Planning and Building Standards Online Services.

### **3.2 Determining Issues**

In considering whether to grant consent, special regard must be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.



For the purposes of this issue, preserve, in relation to the building, means preserve it either in its existing state or subject only to such alterations or extensions as can be carried out without serious detriment to its character.

Do the proposals harm the character or appearance of the conservation area? If they do, there is a strong presumption against granting of permission.

### **3.3 Assessment**

To address these determining issues, the Committee needs to consider whether:

- a) the proposed alterations will have a detrimental impact on the character of the listed building or its setting;
- b) the demolition of the boiler house is acceptable and meets the criteria specified in the Scottish Historic Environment Policy (SHEP) tests;
- c) the proposals will preserve or enhance the character and appearance of the conservation area;
- d) any impacts on equalities or human rights are acceptable; and
- e) comments raised have been addressed.

#### a) Impact on the Character of the Listed Building

The application proposes that the buildings, which are currently in educational use, be converted to residential accommodation. This listed building consent application is for the physical alterations that will be required to fulfil that function. The impact of the proposed new build elements which are the subject of the concurrent planning application (12/04007/FUL) on the setting of the listed buildings, are assessed in that application. The specific proposal to demolish the Boiler House is dealt with in Section 3.3.b below.

The proposals to convert the buildings to accommodate 64 dwellings is as described in proposals above.

It is proposed to remove the Boiler House Annex which is set below New Craig's basement level and relates to the Boiler House and the road. This part of New Craig does not appear in any of the original Sydney Mitchell drawings of the buildings. It has an interesting roof configuration of a series of hipped slated roofs but presents a blank stone wall at road level. The removal of this element will enable the road to be widened to an acceptable standard which will enhance access to Queen's Craig and the top of the site. As the Annex is not original, and of no great merit, it is acceptable to remove this part of New Craig. The removal of the modern extension to East Craig and the ramp on Old Craig will be of benefit to the buildings.

With the exception of the removal of the Boiler House Annex and the non-original extension to East Craig, external changes have been minimised. In terms of new interventions, the current scheme is proposing an extension on South Craig and a dormer extension on East Craig and a new entrance to Bevan with associated platt. There will be the introduction of some railings at roof levels on South Craig and New Craig and rooflights will be formed in New Craig. The extensions and the new entrance to Bevan all enable the subdivision of the large villas into flatted dwellings. The South Craig extension is to the rear and set into the hill and the East Craig dormer extension replaces a non-original dormer element.

The entry platt to Bevan is well designed and will be compatible with the design of the rest of the building. Similarly the design of new railings will be as per other railings and will integrate within the rest of the buildings. The new rooflights on New Craig will have a minor visual impact on the appearance of the building but will allow additional accommodation to be formed within the roof space. This increases the financial viability of the conversion of the building as the more units that can be accommodated within the building, the less pressure there is for new build.

Internally, the conversion of the buildings to residential units has been organised to make maximum use of the existing layout including stairs and access. It involves elements of both vertical and horizontal subdivision of the buildings but uses the existing configuration of the buildings to be guided by the appropriate location for subdivisions. Although it would have been possible to accommodate more dwelling units within the seven listed buildings, this would have involved a far greater level of subdivision and intervention that would be detrimental to the fabric, features and character of the listed buildings. The current layout reflects a sensitive approach to the conversion of the buildings and, although some units will be large, the layout involves the minimum alterations to achieve self contained units. Because the buildings in some instances will be horizontally sub-divided, the building of walls that will provide the necessary fire rating will necessitate the re-running of some cornices but this is acceptable within the context of the works to the whole set of buildings. The occasional introduction of new stairs is acceptable on the grounds that it enables the buildings to be converted. In addition, some level of intervention, particularly in New Craig, such as the subdivision of the occasional room of interest and the insertion of a mezzanine in one of the rooms in the North Wing are all considered acceptable in the context of the need to convert the buildings to a new use. The most significant spaces in the buildings, including the Great Hall in New Craig, will be kept intact.

The permanent blocking up of the tunnels is acceptable as many of these tunnels have already been filled in, and although of some interest, it is not feasible to open them up again. The removal of non-original features that are not of merit is to be welcomed. Overall, the scheme strives to retain the features that are of value in the vast majority of situations.

The proposals have been amended to delete some extensions that were part of the original submission. This is an improvement and the proposed alterations and works to the exterior will cause a minimal impact on the setting of the listed building. The removal of the modern extension on East Craig will be of benefit to the building. The removal of the Boiler House and Boiler House Annexe will not harm the setting of the listed buildings. There will be alterations to the main entrance gates. The narrowing of the entrances will provide a more traditional approach which will enhance the boundary treatment and the setting of the listed buildings. The proposals will have no detrimental impact on the setting of the listed building.

These former institutional buildings are at risk of long term neglect if a new and sustainable use is not found for them. Their conversion involves certain compromises that are acceptable given the need for a new use. The current scheme represents a well conceived response that balances the need to conserve what is significant about the buildings while doing the minimum required to convert the building to a new use.

There will be no adverse effect on the character of the listed buildings or their setting.

b) The Acceptability of the Demolition of the Boiler House

The Scottish Historic Environmental Policy (SHEP) sets out the context for considering applications for the demolition of listed buildings. It states that it is Scottish Ministers' policy that no listed building should be demolished unless it can be clearly demonstrated that every effort has been made to retain it.

Consequently planning authorities should only approve such applications where they are satisfied 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.

This position is supported by Policy Env 2 of the Edinburgh City Local Plan (ECLP), which also states that demolition will only be supported in exceptional circumstances, taking into account the merits of alternative proposals for the site and whether there are public benefits to be derived from allowing demolition which outweigh the loss.

The justification for demolition of the boiler house needs to meet only one of the SHEP tests above in order to be considered acceptable. The applicants have submitted a statement justifying its demolition based on Test A - that the building is not of special interest.

The Boiler House lies to the north of New Craig on the other side of the service road that leads up to Queen's Craig. Although physically separated from New Craig it reads from the air as part of the larger New Craig complex and is connected under the road, via its service routes, to New Craig. OS maps of 1893-4 or 1896 indicate that it was not built at the same time as New Craig but was built by the time of the 1908 map. It is possible that it may have been built because the original heating system for New Craig proved to be inadequate. There are modern extensions to the north. The building is in poor condition and has attracted vandalism and graffiti.

The Boiler House is an outbuilding to New Craig. It is not contemporary with the New Craig and is not part of the overall vision and composition of New Craig and the larger site. The building is set into the hill and is positioned to be inconspicuous. It is not mentioned in the list description and is listed only by virtue of being within the curtilage of New Craig. It is not worthy of listing in its own right, as its only interesting features are its pyramidal roof and stone arch details to the north.

The Boiler House is not of special interest and its demolition can be justified against the first SHEP test.

Policy ENV 2 of the Edinburgh City Local Plan supports demolition only in exceptional circumstances including: *the merits of alternative proposals for the site and whether the public benefits to be derived from allowing demolition outweigh the loss.*

The conservation and continued viable use of these significant A listed buildings is dependent on a level of new build on the site that will cross fund the works required for the conversion. The demolition of the Boiler House will allow new build on this part of the site which has been assessed in the concurrent planning application as being an appropriate location for new development. This will help enable the significant buildings to be retained. Therefore the public benefit of conserving the main subjects of listing outweigh the loss of the Boiler House.

Conditions will be added to this consent to ensure that the building is appropriately recorded prior to its demolition and that a Notice of Initiation for the new build has been submitted which confirms the start date.

c) Impact on the Character of the Conservation Area

The Craiglockhart Hills Conservation Area Character Appraisal notes that:

*The views to the Hills from Arthurs Seat, Calton Hill, Blackford Hill and Edinburgh Castle are also spectacular, in particular to Easter Craiglockhart Hill on which high quality Victorian buildings are set against a predominantly wooded hill.*

And that:

*The Craighouse complex has a strong unity of composition derived from the inter-relationship of buildings, woodlands, open spaces and views over the city. Areas of woodland to the south west provide an important backcloth to the buildings, the setting of which is further enhanced by varied specimen trees which provide a sense of scale. The buildings form a homogeneous group round the old mansion, as they are closely related in design, layout and materials. This character has remained largely unchanged since the late 19th century. The conversion of the site by Napier University has maintained the essential historic and architectural character, and conserved and enhanced the surrounding landscape.*

And states that: *listed buildings and ancient monuments will be protected, as will their setting and surroundings.*

This listed building consent application is for the alterations and extensions to the listed building and not the new build elements. Therefore this report can only assess the impact that proposed alterations to the listed buildings have on the character and appearance of the conservation area as opposed to the impact of any new build elements.

The removal of the Boiler House and the Boiler House Annex will not compromise the integrity of the listed structures and will not adversely affect the character or appearance of the conservation area. These elements are of minor interest and their inconspicuous location in the conservation area means that the impact of their loss will be minimal.

The removal of the modern extension to East Craig will be an improvement. New external interventions to the listed buildings will be limited and of good quality. They will be sympathetic to the buildings and the area.

The elements proposed in this application will preserve the character and appearance of the conservation area.

d) Equalities and Human Rights impacts

The accessibility of a large number of units is of benefit to those with disabilities and there will be an overall improvement in equalities. An Equalities and Human Rights Impact Assessment has been completed.

e) Public Comments

**Material representations -**

- The conservation of the built environment. The case for the loss of the Boiler House is discussed in Section 2.3.b). The stopping up of the tunnels is discussed in Section 2.3.a) and the alterations and additions to the listed buildings are assessed in 2.3.a)
- The process and quality of the submission. The application was re-advertised on 15 March, 2013 after missing information had been submitted.

**Non-material representations** - Comments that are non-material to the assessment of this listed building consent application but that are material to the concurrent planning application (12/04007/FUL) will be assessed in the relevant report to committee.

**Community Council Comments** - Craiglockhart Community Council has no objections.

CONCLUSIONS

In conclusion, the proposals comply with the development plan and non-statutory guidance. They will not adversely affect the character of the listed building or its setting or the character and appearance of the conservation area. The case for demolition of the Boiler House is accepted. The proposals will help ensure the long term sustainable survival of these significant listed buildings and represent a sympathetic, minimal intervention to the buildings. There are no other material considerations which outweigh this conclusion and subject to the addition of conditions to ensure the recording of demolitions, the contract, and further details, approval is recommended.

It is recommended that this application be Granted subject to the details below.

### **3.4 Conditions/reasons/informatives**

1. The application shall be notified to the Scottish Ministers prior to determination.
2. No demolition shall start until the applicant has confirmed in writing the start date for the new development by the submission of a Notice of Initiation.
3. The Royal Commission on the Ancient and Historical Monuments of Scotland shall be given access to the site, at any reasonable time in a period of at least three months from the date of this consent, for the purposes of recording the building, structure or other item of interest.
4. A conservation strategy is required relating to historic wall paper in both Old Craig and New Craig prior to the submission of any proposals to alter the wall paper.
5. Details of the location of suspended ceilings shall be submitted to and approved by the Head of Planning and Building Standards before work is commenced on site.
6. Details of the treatment of interior timber panelling shall be submitted to and approved in writing by the Head of Planning and Building Standards before work is commenced on site.
7. Details of fireplace removals and relocations in the form of a schedule shall be submitted to and approved in writing by the Head of Planning and Building Standards before work is commenced on site.
8. Details of external wall treatment where the Boiler House Annexe is being removed shall be submitted to and approved in writing by the Head of Planning and Building Standards before work is commenced on site.
9. Details of housing for ventilation through the roof of Old Craig shall be submitted to and approved in writing by the Head of Planning and Building Standards before work is commenced on site.

#### **Reasons:-**

1. In order to accord with the statutory requirements of the Town and Country Planning (Scotland) Acts.
2. In order to safeguard the character of the statutorily listed building.
3. In order to safeguard the interests of archaeological heritage.
4. In order to safeguard the character of the statutorily listed building.
5. In order to enable the Head of Planning and Building Standards to consider this/these matter/s in detail.

6. In order to enable the Head of Planning and Building Standards to consider this/these matter/s in detail.
7. In order to enable the Head of Planning and Building Standards to consider this/these matter/s in detail.
8. In order to enable the Head of Planning and Building Standards to consider this/these matter/s in detail.
9. In order to enable the Head of Planning and Building Standards to consider this/these matter/s in detail.

## **Informatives**

It should be noted that:

1. The works hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.

## **Financial impact**

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### **4.1 The financial impact has been assessed as follows:**

There are no financial implications to the Council as a result of this Listed Building Consent application.

## **Risk, Policy, compliance and governance impact**

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5.1 Provided planning applications are determined in accordance with statutory legislation, the level of risk is low.

## **Equalities impact**

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### **6.1 The equalities impact has been assessed as follows:**

The application was assessed in terms of equalities and human rights. The impacts are identified in the Assessment section of the main report.

## **Sustainability impact**

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### **7.1 The sustainability impact has been assessed as follows:**

This application is not subject to the sustainability requirements of the Edinburgh Design Guidance.

## **Consultation and engagement**

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### **8.1 Pre-Application Process**

This application was the subject of extensive pre-application discussions prior to the submission of this application.

## 8.2 Publicity summary of representations and Community Council comments

The application was advertised on 23 November 2012. Due to some drawings having been omitted in the first submission, the application was re-advertised on 15 March 2013. There have been 39 letters of representation, including 33 individuals, the Craiglockhart Community Council, the Garden History Society, the Morningside Court Residents Association, the Cockburn Association and two individuals representing the Friends of Craighouse.

In all there have been two letters of support, one letter of comment and the rest have been letters of objection. One person has written two letters, one supporting the proposals and one objecting. Eight letters are non-material to the assessment of the listed building consent application.

### Material Representations

The main points of objection/concern can be summarised as follows:

#### matters relating to conservation of the built environment:

- new additions and alterations are detrimental to the character of the listed building;
- the loss of the boiler house is detrimental to the character of the listed buildings; and
- the blocking up of the tunnels is detrimental to the character of the listed buildings.

#### matters relating to process and quality of the submission:

- there were irregularities in the processing of the application; and
- the submission is inadequate in terms of its quality.

The main points of support can be summarised as follows:

#### matters relating to the principle of the development:

- The conversion of the listed buildings into flats is to be supported.

### Non-material Representations

Non material points raised are as follows:

- the financial case for the conversion and new build has not been demonstrated;
- matters relating to quantity of the new build element on the site;
- matters relating to the design of the new build element on the site;
- matters relating to road and pedestrian safety;
- matters relating to residential amenity;
- matters relating to local infrastructure;
- matters relating to the open space; and
- matters relating to the natural environment and wildlife.

These non-material points are dealt with in the concurrent planning application.



## Community Council Comments

The Craiglockhart Community Council has no objections to the listed building consent application.

A full assessment of the representations can be found in the main report in the Assessment section.

## Background reading / external references

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- To view details of the application go to
- [Planning and Building Standards online services](#)

### Statutory Development

#### Plan Provision

Edinburgh City Local Plan, Craiglockhart Hills Conservation Area, Open Space, Area of Great Landscape Value. Part of the site is within a Local Nature Reserve and part is within a Local Nature Conservation Site.

#### Date registered

12 November 2012

#### Drawing numbers/Scheme

01, 117-121, 123-127, 129-142, 144-202, 203a, 204a, 210a,,  
211a, 212, 213a, 214-224, 225a, 226a, 227-232, 256-263, 266,,  
268-274, 276-281,

Scheme 3

## **David R. Leslie**

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## **Links - Policies**

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### **Relevant Policies:**

#### **Relevant policies of the Edinburgh City Local Plan.**

Policy Env 2 (Listed Buildings - Demolition) identifies the circumstances in which the demolition of listed buildings will be permitted.

Policy Env 3 (Listed Buildings - Setting) identifies the circumstances in which development within the curtilage or affecting the setting of a listed building will be permitted.

Policy Env 4 (Listed Buildings – Alterations & Extensions) identifies the circumstances in which alterations and extensions to listed buildings will be permitted.

Policy Env 6 (Conservation Areas Development ) sets out criteria for assessing development in conservation areas.

#### **Relevant Non-Statutory Guidelines**

**Non-statutory guidelines** 'LISTED BUILDINGS AND CONSERVATION AREAS' provides guidance on repairing, altering or extending listed buildings and unlisted buildings in conservation areas.

#### **Other Relevant policy guidance**

The Craiglockhart Hills Conservation Area Character Appraisal emphasises the outstanding quality of the natural topography and its visual relationship with the city, the high quality buildings set within a mixture of wooded and open slopes, the use of natural stone and slate as the traditional building materials.

# Appendix 1

## **Application for Listed Building Consent 12/04007/LBC At Napier University Craighouse Campus, Craighouse Road, Edinburgh Proposed conversion of existing listed buildings at New Craig , Queen's Craig, East Craig, Bevan Villa, South Craig, Craighouse Lodge, Old Craighouse to form residential properties, including extension at South Craig and demolition of Boiler House (as amended).**

### **Consultations**

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#### **Historic Scotland**

*We have considered your consultation and comment as follows:*

*This letter is split into 4 distinct responses - firstly we set out our response to your council in regard to the Environmental Impact Assessment, secondly our assessment of the case for development, thirdly a response to the Development Management Procedure Scotland (Regulations) (DMPR), and fourthly the Listed Building Consent application (LBC).*

#### *1. Environmental Impact Statement*

*The following comments are based on our statutory historic environment interests. That is scheduled monuments and their setting, category A listed buildings and their setting and gardens and designed landscapes and historic battlefields in their respective Inventories.*

#### *Baseline and Methodology*

*In general, we are satisfied that the environmental statement has identified the most relevant historic environment baseline against which to test the proposals. While the assessment would have benefited from a more holistic consideration of the group of A listed buildings within their wider setting we have based our comments on the information provided within the environmental statement. While we are in general, content to agree with the findings of the majority of this assessment we would like to offer further detailed comments on some aspects of the findings of the assessment.*

#### *Physical Impact to Listed Buildings*

*We note that the conversion of this large group of Category A listed buildings for residential use is considered to be a Major positive impact. Subject to the detail of the Listed Building Consent process we agree that the proposals will be of significant benefit to these historic environment assets in relation to their long-term sustainable future.*

### *In-direct Impacts*

*As noted above, the assessment reports on the individual listed structures and their settings and is less focused on a larger consideration of their context. Notwithstanding this we would generally agree with the findings of the assessment in relation to the impacts on the setting of these sites. However, we would not agree with the assessment findings in relation to the potential impacts on the settings of both South Craig House and Bevan House. In terms of the impact on South Craig House we note that the assessment considers that there will be a minor impact from the proposed Coulson Tower, citing the removal of the unsympathetic structure currently on the site. While we agree that the current structure detracts from the setting of South Craig the substantial scale of the Tower proposal would dominate views of South Craig and we do not consider that the removal of the existing structure mitigates this impact to any significant degree. To an extent this is recognised by the assessment but we would argue that the impact on the setting of South Craig is more than the minor impact reported in the assessment. We are of the view that the impact is likely to be of greater significance and should be considered at least a moderate impact on its setting, leading to a moderate to large significant negative impact.*

*Similarly we do not agree with the assessment finding relating to the setting impact on both South Craig and Bevan Houses through the insertion of a structure between these two sites. The assessment considers that there is no adverse impact in relation to this intervention as intervisibility between the two sites would not appear to be a key function of their relationship. While we agree that this intervisibility component between the two sites is not a great significance our concerns lie more with the reading of these two assets in their current setting. The inclusion of another structure between these two sites (as well as Clouston Tower to the south) would create a less readable relationship between the two sites within their landscape and create a more rigid grouping of buildings lining across the hillside. We would therefore argue that this constitutes a moderate impact on the setting of both South Craig and Bevan Houses.*

## *2. Assessment of the Case for Development*

### *The case for development*

*Throughout the pre-application discussions the extent of new-build development has been discussed at length. The submitted scheme reflects discussions regarding the appropriateness of various sites across the campus, and addresses many of our earlier concerns. Our comments on individual components of the development are given later in this letter.*

*Underpinning the case for an appropriate level of development at the Craighouse campus is the key priority of providing a sustainable economic use for the whole site, but particularly for the listed buildings. The background to such a case was submitted as a development appraisal by the developers in 2011. That appraisal was subsequently (summer 2012) considered by Knight Frank on behalf of your authority. We have had sight of both the original appraisal and Knight Frank's report, and have had the latter considered by Scottish Government colleagues.*

*The 2011 development appraisal was based on the scheme as then drafted. Since that time considerable amendment has been carried out, although the basic economic model, with new build residential units supporting the restoration and conversion of the listed buildings to residential, remains the same.*

*We note from your recent correspondence (10 December) that your authority has requested further, updated development appraisal information from the applicants. We support your authority in seeking this information. We will respond separately outlining outstanding issues, many raised by Knight Frank, that we believe need to be addressed in the updated development appraisal.*

*We will be happy to comment further on the updated development appraisal as and when that information is received by your authority.*

### *3. DMPR Comments: The setting of A-listed buildings*

#### *Design and Materials*

*Our concerns expressed in earlier comments in regard to the initial rather fragmented style approach to the new buildings across the site have now been addressed, with a revised design strategy which is applied throughout the site. This employs a careful choice of materials, colours, and textures - all seeking to harmonise with the listed buildings and their landscape setting.*

#### *Individual sites*

*We note that since September there have been considerable revisions to both the landscaping strategy, and design of the new buildings throughout the site. As the naming of individual elements has changed since our last comments, I should emphasise that the comments below use the plot names from the submitted scheme.*

#### *Kings Craig*

*This site is immediately to the south of the main block of New Craig, and its location and the sloping topography of the site mean that any development here will be prominent. The omission of the 2 pinwheel blocks of flats on this site, and their replacement by a terrace of contemporary town houses is to be welcomed. In terms of impact to setting and built form, this design has a better relationship with New Craig.*

#### *West Craig*

*We support the design revision to this site to tie these buildings in with nearby Kings Craig, whilst still maintaining an appropriate scale response to Queens Craig.*

#### *Old Craig Court*

*The development of the current car parking site to the east of Old Craig has been an area of extensive discussion and revision. The initial concerns we voiced in regard to this area have been largely addressed, with new development fully integrating with its immediate parkland setting, as was discussed in Workshop sessions with A+DS.*

*The location of the terraced development is an appropriate distance down the slope to avoid a negative impact on the setting of Old Craig, which will retain its visual presence in the wider landscape in key views from the south.*

### *North Craig*

*We have supported development of the Boiler House site throughout the pre-application process. The form and design of the proposed buildings of North Craig are respectful of the architectural language of New Craig, and utilise the falling ground to their advantage while minimising impact to the listed building.*

### *Old Grove Court*

*The rationalisation of development to the fringe of the site has been significantly explored and developed since September. We do not believe Old Grove Court and its associated landscaping would have a detrimental impact to the setting of the listed buildings. The site sits low in parkland and is shielded by existing planting and boundary wall.*

### *Craiglea Place*

*As the proposed continuation of Craiglea Place is within a very discrete part of the site, it has no setting issue to the listed buildings.*

### *Duncan and LRC site*

*The submission of the application sees us consulted in regard to 2 new development sites which we have had no prior part knowledge of. It is proposed to build an 8-storey tower block on the site of the Learning Resource Centre to the Eastern ridge. Furthermore there is a proposal to build a 3-storey housing block between South Craig and Bevan on the eastern ridge. In terms of assessing the impact to the adjacent listing buildings, and the site as whole, we do not feel at this moment in time there has been adequate supporting material and dialogue to allow us to make a full assessment. We would reserve comment in regard to these new development sites until such time as we have further information.*

### *Listed Building Consent Comments*

*We welcome the sensitive conversion strategy which has been adopted by the applicant to the listed buildings. While we recognise that there may be scope to introduce a more intensive scheme that would see the building divided to a greater degree, this would not be an approach that we would generally support, as it would greatly harm the value and significance of the site. We have welcomed the opportunity to visit all the listed buildings - Old Craig, New Craig, Queens Craig, East Craig, Bevan, South Craig and the Lodge on a number of occasions throughout 2012 with your officer Barbara Stuart, William Gray Muir (Sundial Properties) and Andrew Stevens (Oberlanders Architects).*

*In general the subdivision of the listed buildings has taken full account of their character, plan-form, and surprisingly intact survival of high quality fixtures and fittings. Furthermore there are a number of significant conservation benefits by the removal of a number of un-sympathetic 20th century alterations.*

### *General Points*

*Perhaps it would be helpful in the first instance to draw upon matters that have a commonality throughout the site. We are aware that some further clarification is required in regard to meeting the requirements of building standards, and importantly how these changes will impact on the fabric and appearance of the buildings.*

*We welcome however that it has already been established that individual balanced flues to apartments have been discounted due to the detrimental impact they would have on the exterior appearance of the building. Instead it has been proposed to rationalise, and group flues internally throughout the building in areas where minimal disruption to historic fabric will occur.*

*It is proposed to adopt a fire suppression system, this approach will allow for the retention of important fixtures and fittings (for example internal doors, decorative screens, and the abundance of stylised leaded lay-lights) which otherwise would be significantly altered or compromised to comply with fire regulations.*

*It is the intention of the applicant to refurbish all the windows by way of repair, it has been stated that no large scale replacement of windows is proposed, and it is not proposed to re-glaze with slim-profile.*

*As noted above there have been a number of site visits in the last year where alterations detailed on the current submitted set of drawings have been discussed. By agreement with all those present a number of changes have been made. However as yet, a large number of these have not been translated to the plans. We would ask that these changes are reflected in the most up to date drawings. This will allow us to have confidence that the submitted proposals are an accurate representation of the verbal assurances that have been given to date.*

### *Specific Buildings*

#### *Old Craig*

*Whilst being the oldest building on site, a significant part of the interior has been heavily modernised. The proposed conversion seeks to sensitively restore the building back to a single dwelling. Furthermore we welcome the proposal to lime wash the building a traditional colour which will give the building a more authentic appearance.*

#### *New Craig*

*In general we have no major concerns with the design strategy adopted to subdivide this vast building. The removal of fire partitioning to the 1st floor of the great hall is to be particularly welcomed, re-instating this impressive space back to its original appearance. As site visits have only very recently finished at New Craig, there have been a number of changes discussed that as yet have not been revised. We would welcome the opportunity to see these added before commenting in further detail. Added to the above, one key area which needs further discussion is the proposal to partition the ground North Wing spine corridor which runs off the Great hall past the former Dining Room.*

#### *Queens Craig*

*We have no concerns with the design strategy adopted to subdivide this building.*

#### *Lodge*

*The refurbishment of the lodge is sensitive and respectful to the building, the omission of the proposed large extension is welcomed.*

### *East Craig*

*We have no concerns with the design strategy adopted to subdivide this building. The loss of the late 20th century extension is to be welcomed.*

### *Bevan*

*In general the design strategy to subdivide this building causes us no major issues. However there are 3 points where further clarification and discussion has been required. We recognise that the configuration of the building was particularly designed for its use as accommodation for patients. In the case of Bevan, subdivision utilising the main stair to service the 3 proposed apartments has not proved practicable. The stair therefore becomes obsolete as a stair, however its high quality design, and the fact it is the principle stair dictates its meaningful retention. Furthermore it is our understanding that plans will be revised to omit the proposed slapping from the hall into the main reception room. The architectural design, quality and integrity of the hall is such that it should not be compromised. On site there was discussion about revising the design of the new entrance to the west elevation, we look forward to seeing this. We recognise that the villa buildings are very much designed in the round, with articulated faces to each elevation. Therefore any form of extension needs to be very carefully assessed in terms of the contribution it makes. The proposed extension to Bevan is located in a discrete area on the south elevation, it is our view that it does not have a detrimental impact to the character of the building.*

### *South Craig*

*In general the design strategy to subdivide this building into 3 apartment causes us no major issues. However as with Bevan, the principle of placing extensions onto this 4-sided building needs to be very carefully considered. On site we noted that we could not support the extension to the principle elevation.*

## **Historic Scotland - response dated 26/03/2013**

*Thank you for your consultation dated 13 March which we received on 13 March. We have considered your consultation and comment as follows:*

*We propose to address your re-consultation in the same format as our previously submitted comments of 21 December 2012. Therefore we have split the response into 4 distinct sections; Environmental Impact Statement, Case for Development, Development Management Procedure Scotland (Regulations) and Listed Building Consent Application.*

### *1. Environmental Impact Statement*

*We note the minor amendments contained within the addendum replacement chapter for Archaeology and Cultural Heritage. In noting that the majority of the assessment remains unchanged we would refer you to our previous comments dated 21 December 2012 regarding assessment of impact, in particular the impact on the setting of South Craig and Bevan.*

### *2. Assessment of the Case for Development*

*In our response to your council on the 21 December 2012 we outlined that we would respond further to your authority on information that is commercially confidential. We did so on 21 January 2013 raising a number of issues that required further*



clarification. We note that there has been subsequent information submitted as part of this current re-consultation. Given the business sensitive nature of this particular matter we would welcome further discussion with your Council.

### *3. DMPR Comments: The Setting of the A-listed Building*

*We note that the massing, form, layout and materials of the proposed new build have not changed since our last letter, and therefore, we would refer you to our previous comments dated 21 December, particularly in regard to Duncan and the LRC site.*

### *4. Listed Building Consent Comments*

*We welcome the updates made demonstrating a number of revisions since our last comments, in particular the reduction of extensions to South Craig and Bevan.*

*One point that still remains outstanding, however, is the proposal to partition the ground floor North Wing spine corridor which runs off the Great Hall, past the former dining room. Whilst it has been argued division of this space will be of advantage to the functioning of the apartment it is intended for, this has to be weighed against the disadvantage to the character, enjoyment and understanding of the public circulation spaces which elsewhere have been sensitively handled. We would urge further consideration of this matter.*

*We would ask that further consideration is given to establishing the provenance of decorative wallpapers which are to be found in both Old Craig and New Craig. Should it be established that they are authentic Victorian papers, a conservation based strategy should be established in terms of their practicable/reasonable retention/recording.*

*As noted above there remain a number of outstanding issues, and with this in mind we would value a meeting to discuss these at the earliest opportunity with your council.*

## **Historic Scotland - response dated 14/01/2014**

*Thank you for your consultation dated 17 December which we received on 17 December. We have considered your consultation and comment as follows:*

*Thank you for your consultation in regard to the Craighouse Campus site. As with our previous replies to your council we propose to split our letter into distinct sections which will address the following - Environmental Impact Assessment, Development Management Procedure Scotland (Regulations) (DMPR) and the Listed Building Consent application (LBC). In our conclusions we have included comments in relation to the importance of the future of the site being protected by the achievement of a sustainable development. We have concluded that the proposals do not raise issues of national significance for the historic environment such that we would object.*

### *1. Environmental Statement*

*As you will be aware, in our response to the original Environmental Statement (dated 21 December 2012) we raised a number of concerns regarding the assessment and its findings. The following comments relate to our original concerns against the updated assessment in light of alterations to the proposals.*

### *Baseline and Methodology*

*We remain content that the environmental statement has identified the most relevant historic environment baseline against which to test the proposals. In terms of our comments regarding a more holistic approach to the assessment of the buildings as a group we welcome the expansion of consideration in this area and are content with the findings, although we consider the impact to be more neutral than positive.*

### *Duncan*

*Our original concerns related to the impact this component of the development would have on the setting of South Craig and Bevan Villa and their legibility in their setting. We therefore note that this building has been removed from the proposals and as such have no further comments to offer on this issue.*

### *Clouston*

*We note that the vertical dominance of the original proposed tower has been lessened by its reduction in height. However, the substantial increase in the massing of the block form of the revised proposal remains a significant impact on the immediate setting of South Craig. We therefore consider that this impact remains more significant than the reported minor impact from the environmental assessment.*

## *2. DMPR Comments: The Setting of A-listed Buildings*

### *Individual Sites*

*We note that since the previous public consultation in the Spring of 2013 there have been considerable revisions to both the landscaping strategy and the design of the buildings throughout the site. As the naming of some of the individual elements has changed since our last comments, I should emphasise that the comments below use the plot names from the current, revised scheme.*

### *Kings Craig*

*We note that the overall massing and scale of this row of townhouses has been reduced, particularly in regard to the central vertical element, and welcome this amendment as it will reduce the impact this element of the scheme will have on the setting of the historic buildings.*

### *West Craig*

*We note that the overall massing and scale of this row of townhouses has been reduced, and welcome this amendment, as it will reduce the impact this element of the scheme will have on the setting of the historic buildings.*

### *North Craig Villas*

*We have supported the re-development of the 'Boiler House Site' since it was tabled in the masterplan process, believing that a sensitively designed development in this location should be achievable with minimal impact of the adjoining listed building. From Spring 2013 there has been a comprehensive redesign of the terrace. The proposed buildings now present more of a traditional appearance echoing the existing run of ancillary buildings they will replace. In terms of impact to setting, New Craig will retain its visual dominance, as the new buildings will sit below the main range, utilising the falling ground to their advantage, and in longer views from the north will be screened by the surrounding woodland. We therefore welcome this amendment as it reduces the impact on the historic environment.*

### *Craiglea Place*

*The proposed terrace of 6 houses has been reduced to 4. As we have previously noted, the continuation of Craiglea Place is within a very discrete part of the site, and therefore has no setting impacts to the listed buildings.*

### *Duncan*

*The proposal to build a 3-storey housing block between South Craig and Bevan on the eastern ridge has been dropped from the scheme. We welcome this revision to the masterplan as we had major concerns in relation to the potential impact this aspect of development might have on the relationship between the listed buildings.*

### *Clouston*

*From Spring 2013 there has been a comprehensive redesign of the architectural language and scale of this block. We welcome the reduction in height of this building, which reduces its impact on long views and the site as a whole. This reduction has, however, been achieved by greatly increasing the floorplate of the building proposed. The greater bulk of this building, will, therefore, have a regrettably higher impact on the setting of the A Listed South Craig block immediately to its north.*

### *Napier and Burton*

*This site, currently the car-park and bus turning circle, has seen a number of revisions during the design process. The apartment blocks are a significant departure from earlier design approaches in terms of height, footprint and design. The increase in bulk of these proposals will inevitably have a considerable impact on the overall site, particularly in long views into and out from the higher ground to the south and from the historic approaches to the site.*

*In terms of footprint, Napier has been located further down the slope away from Old Craig with the formation of a generous delineated courtyard and walled garden, allowing Old Craig an appropriate breathing space and contextual immediate setting.*

*We believe the combined visual envelope of Napier and Burton will have a greater impact to the setting of Old Craig than the previous schemes.*

### *3. Listed Building Consent Comments*

*We fully welcome the conversion strategy which has been adopted to the full suite of listed buildings on the site.*

*Whilst we recognise that there may be scope to introduce a more intensive scheme that would see the building subdivided to a greater degree, we greatly welcome that this application does not propose this. The internal layout, and high quality fixtures and fittings of Craighouse are of particular merit, and therefore a scheme that respects the existing plan form and features is to be welcomed.*

*We believe the proposed refurbishment works are sensitive, responsive and retain the special value and significance of the buildings.*

#### 4. Conclusion

*In the course of the last three years we have been consulted, either formally or via pre-submission discussions, with a wide variety of development approaches to the Craighouse site. Underlying all has been the imperative of achieving an economically sustainable, long term future for the existing listed buildings on the site, which are currently on the buildings at risk register*

*Your Council has been leading considerable negotiations in establishing the appropriate equilibrium of development in regard to the interests of the landscape value of the site (designated by the Council as an Area of Great Landscape Value) balanced with that of safeguarding this group of nationally important Category A-listed buildings.*

*We are aware that these discussions have shaped this revised application. As noted above, we consider that some of the elements of the current revised submission will necessarily have a greater impact on the setting of certain of the listed buildings, or the wider group. Your authority is best qualified to consider this impact, which arises from the need to provide an appropriate level of development on the site to make it financially sustaining, and judge whether it is necessary in order to achieve the re-use of the site as a whole.*

*In terms of our locus and remit, our paramount objective has to be seeing these buildings removed from the Buildings at Risk Register with the guaranteed lifeline of a sustainable future. As noted above, the proposed refurbishment works are sensitive, responsive and should guarantee the preservation of the special value and significance of the buildings.*

#### **Archaeology - Scheme 2 response dated 16/01/2014**

*Further to your consultation request as a result of this revised submission, I would like to make the following revised comments and recommendations in respect to this application the proposed change of use and conversion of the existing buildings from university campus to residential, and construction of new build residential together with ancillary development, public realm and utilities infrastructure including access roads, car-parking and landscaping*

*As stated previously (see December 2012 & March 2013 responses) the development site is of considerable archaeological and historic interest both in terms of its surviving listed-buildings, landscapes and potential for buried archaeology. A comprehensive history of the site is contained within Appendix 4 Archaeological & Cultural Heritage Chapter of the revised February 2013 Environmental Statement Addendum produced by Wardell Armstrong and Simpson & Brown's Conservation Plan. In summary the site is first recorded in the 12th century as belonging to the important Abbey of Newbattle in the Scottish Borders with Old Craighouse House dating to 1565. The estate survived as private estate until 1878 when it was sold by a Dr Hill Burton to Edinburgh Royal Asylum with Napier University taking over the site in the 1990's.*

*As stated in my earlier responses, both the Old Craighouse House and Craighouse Hospital are regarded as being of national archaeological and historic importance (A-listed) with the wider estate suspected of containing significant archaeological remains relating primarily to the former medieval and post-medieval estate and of course the 19th-20th century hospital.*

*Accordingly this application must be considered under terms Scottish Government's Scottish Planning Policy (SPP) and Scottish Historic Environment Policy (SHEP) and also CEC's Edinburgh City Local Plan Policies ENV3, ENV4, ENV7, ENV8 & ENV9. The aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.*

#### *Buried Archaeology*

*As stated previously, the development site is regarded as being of archaeological significance primarily in terms of its medieval and post-medieval archaeology relating to the Craighouse Estate. The proposed development will require extensive excavations in terms of construction of new buildings, landscaping, utilities, roads car-parking etc. Having read over the accompanying environmental statement by Wardell Armstrong I agree with the general conclusions that such works are regarded as having a the whole a moderate archaeological impact. The scale of mitigation is larger than is again suggested by the revised Environment Statement Appendix 6 i.e. archaeological mitigation will encompass the whole site and not just be focused upon the area immediately surrounding Old Craighouse.*

*Accordingly it is recommended that a programme of archaeological works is undertaken prior to development. In essence this will see a phased archaeological programme of works, the initial phase being an archaeological evaluation up to a maximum of 10% of the site. The results of which would allow for the production of appropriate more detailed mitigation strategies to be drawn up to ensure the appropriate protection and/or full excavation, recording and analysis of any surviving archaeological remains affected.*

*In addition any agreed woodland management plan for the site must have an appropriate mitigation strategy which would aim to protect and enhance the site's archaeological heritage.*

#### *Drainage & SUDS*

*In addition to the above general programme of post determination works, it was mentioned in my response to the March 2013 revised scheme that I have concerns regarding the potential impact the new drainage and flood prevention proposals. In particular this is in regard to the site of the dovecot shown within the woods to the north of Old Craighouse on the 1st edition OS map which appears to be close or on the line of the projected new drainage track.*

*As stated in my earlier responses the requested aim is avoid damage to this archaeological site, with drainage proposals designed to avoid any impact. It was requested that this site be evaluated prior to determination in order to investigate its state of preservation and to allow for drainage designs to be undertaken. It is noted that although further drainage design appears to have been undertaken I refer you to the Drainage Strategy undertaken by Goodson Associates accompanying this application, no consideration appears to have been undertaken in response to these archaeological concerns. Accordingly it essential that before the route of the proposed drainage track is agreed that the exact location of this historic dovecote is located and mitigation measures submitted for agreement which will allow for its protection.*

### *Archaeological Setting*

*It is clear that these new proposals (Scheme 2) will have a significant impact upon the localised setting of the both the historic buildings occupying the site and the surviving estate's historic landscape. In general I concur with the assessments contained within Wardell Armstrong's revised Environmental Statement Appendix 6 that on purely archaeological grounds such impacts are in the main moderate. That said the construction of the new Napier and Burton buildings in my opinion have an significant increased impact, by want of their scale and in particular height on setting of the historic buildings and landscape.*

*This is particularly true in the case of the Burton building whose height above the existing tree heights obscures key views out towards Arthurs Seat and in conjunction with its neighbour Napier could be seem to conflict in scale with its neighbouring historic buildings of Old Craighouse and Craighouse Hospital. A reduction buy 1 to 2 storeys could resolve this issue.*

### *Archaeological Public Engagement*

*Further given the potential importance of these remains in terms of the history of Edinburgh and in particular Craighouse, it is essential that this programme of works contain a programme of public/community engagement (e.g. site open days, viewing points, temporary interpretation boards) the scope of which will be agreed with CECAS.*

### *Historic Buildings*

*As stated the site contains a range of nationally important historic buildings the development of which will see significant works to their fabric. Accordingly if consent is granted it is recommended that a programme of historic building survey (level 2-3) is undertaken prior to and during any works that may either affect or reveal new sections of historic fabric of the listed Old Craighouse and later hospital buildings. The works will be undertaken in accordance with an agreed brief with this office. This is in order that any archaeological remains (historic building fabric) that may be affected are properly recorded where preservation in situ is not possible.*

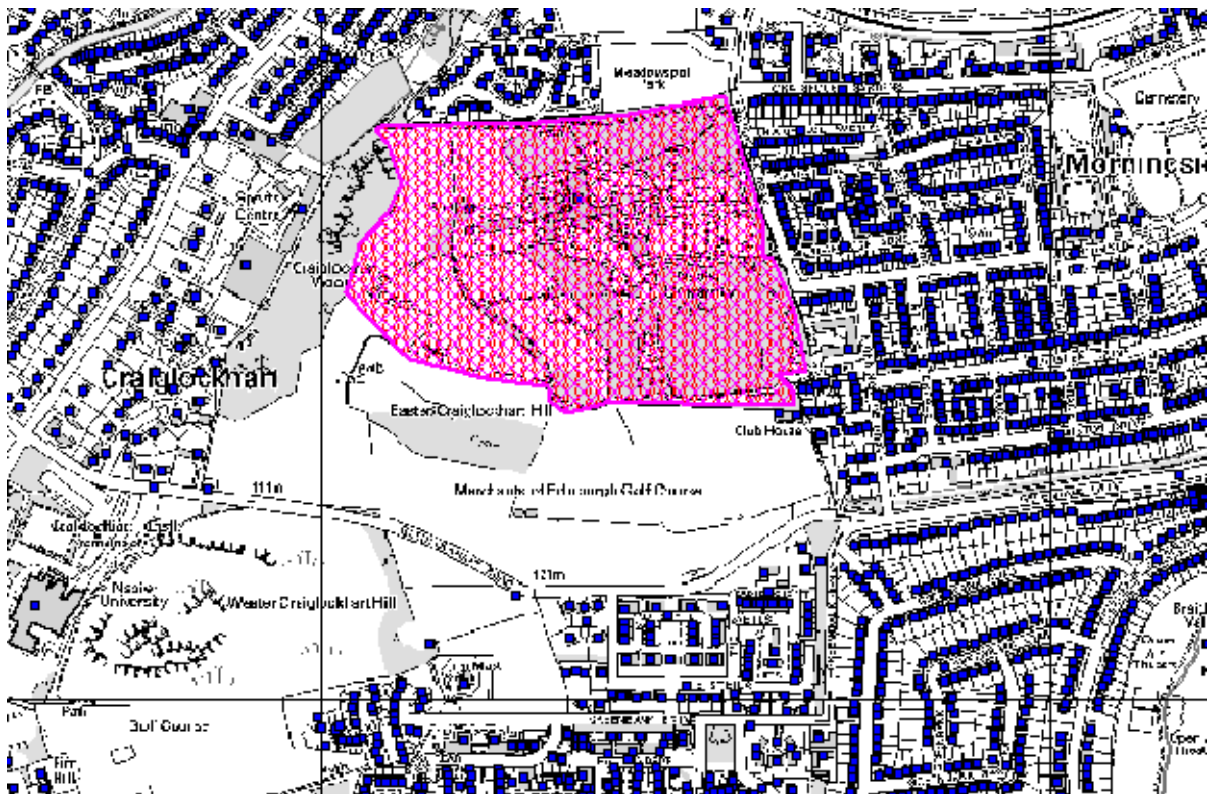
*It is essential therefore that a condition be applied to any consent granted to secure this programme of archaeological works based upon the following CEC condition;*

*'No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (Historic Building Recording, excavation, analysis & reporting, publication, public engagement & interpretation) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.'*

*The work must be carried out by a professional archaeological organisation, either working to a brief prepared by CECAS or through a written scheme of investigation submitted to and agreed by CECAS for the site. Responsibility for the execution and resourcing of the programme of archaeological works and for the archiving and appropriate level of publication of the results lies with the applicant.*

# Location Plan

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