

2F 18 Grange Terrace EH9 2LD

Planning Application 20/01570/LBC

OBJECTION from Grange Association

20 April 2020

The Grange Association has reviewed application 20/01570/LBC and submits this objection.

18 Grange Terrace is a C-listed property, on the end of the terrace and therefore with all elevations visible from Grange Terrace, Blackford Avenue and Oswald Road. We recognise that planning application 20/00277/FUL has already been granted but we consider the conditions to be applied for Listed Building Consent (LBC) should be more rigorous given the prominence of this site.

Our objections relate to the details of the proposal, not to the principle. The Grange Association is generally supportive of proposals to install renewable energy generation for domestic use, as part of a drive to reduce carbon emissions nationally. However, this proposal is for an unusually large array of 22 solar PV panels, with a combined output of 7.4kW, significantly greater than most domestic installations.



18 Grange Terrace, seen from Oswald Road, across Blackford Avenue (Google streetview Oct-2012)

We request that this application should be determined on specific drawings of the proposed roof plan and street elevations, such that compliance with the LBC can be assessed when installation is complete. There are no such drawings in the application at present. All the documents and photographs relate to the current configuration of the roof, with no architectural quality drawings of the proposed finished configuration.

The third page of the document "solar panels details" does include a simple configuration drawing for the panels, but it is not possible to assess how this relates to the roof plan. For example, we cannot assess how proud of the roof the panels will be; we cannot assess how close to the edge of the flat roof the panels will be; we cannot assess the proposed inclination of the panels to the horizontal. In the absence of such detailed drawings, it will not be possible for the Planning Department to assess any future request for enforcement based on non-compliance with approved drawings. The only condition on which we could rely is the one sentence in the application for 20/00277/FUL: "They will not be visible from the street." We note that that sentence is absent from this LBC application 20/01570/LBC. In any case, we do not consider this to be adequate assurance that visible inclined panels would be judged to be non-compliant in any future enforcement request.

We are not aware of any other LBC application that has been granted in the absence of drawings of the proposed plans and elevations. We request that this applicant be required to submit such drawings to provide an unambiguous baseline against which compliance can be assessed.

The Handling Report for the granting of planning permission 20/00277/FUL includes in Section 3.3(b):

The current scheme has been designed to minimise impact on the external appearance of the building. The panels will be set within the flat roof area and will not impact on the building or its setting. The low profile inclination of the panels is such that the visual impact will be mitigated, in accordance with policy.

We challenge the assertion that policy requires visual impact of solar panels on listed buildings to be "mitigated". We believe the policy is clear that panels on listed buildings should not be visible from the street.

Historic Environment Scotland's guidance "Managing Change in the Historic Environment: Micro-renewables" provides guidance and the Council's own guidance "Listed Building and Conservation Areas (Feb 2019)" is consistent with this and states (page 16):

The installation of renewable energy technologies should be carefully sited in order to protect the architectural integrity of the listed building. Poorly located renewable energy technologies can be visually intrusive and will not be acceptable where they detract from the character of the building. They should not be visible from public view.

They may be acceptable in the following locations:

- On the ground to the rear of the building.
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- In the internal valley of a roof, provided that no part projects above the ridge.

Neither of the guidance documents admits "mitigation" of visual impact.

We request that the Council's guidance be implemented and that this LBC be granted only on condition that there are plan and elevation drawings included in the application that show the panels to be configured to be not visible from public view, consistent with the guidance, and that compliance can be assessed unambiguously after installation.

Grange Association
20 April 2020