

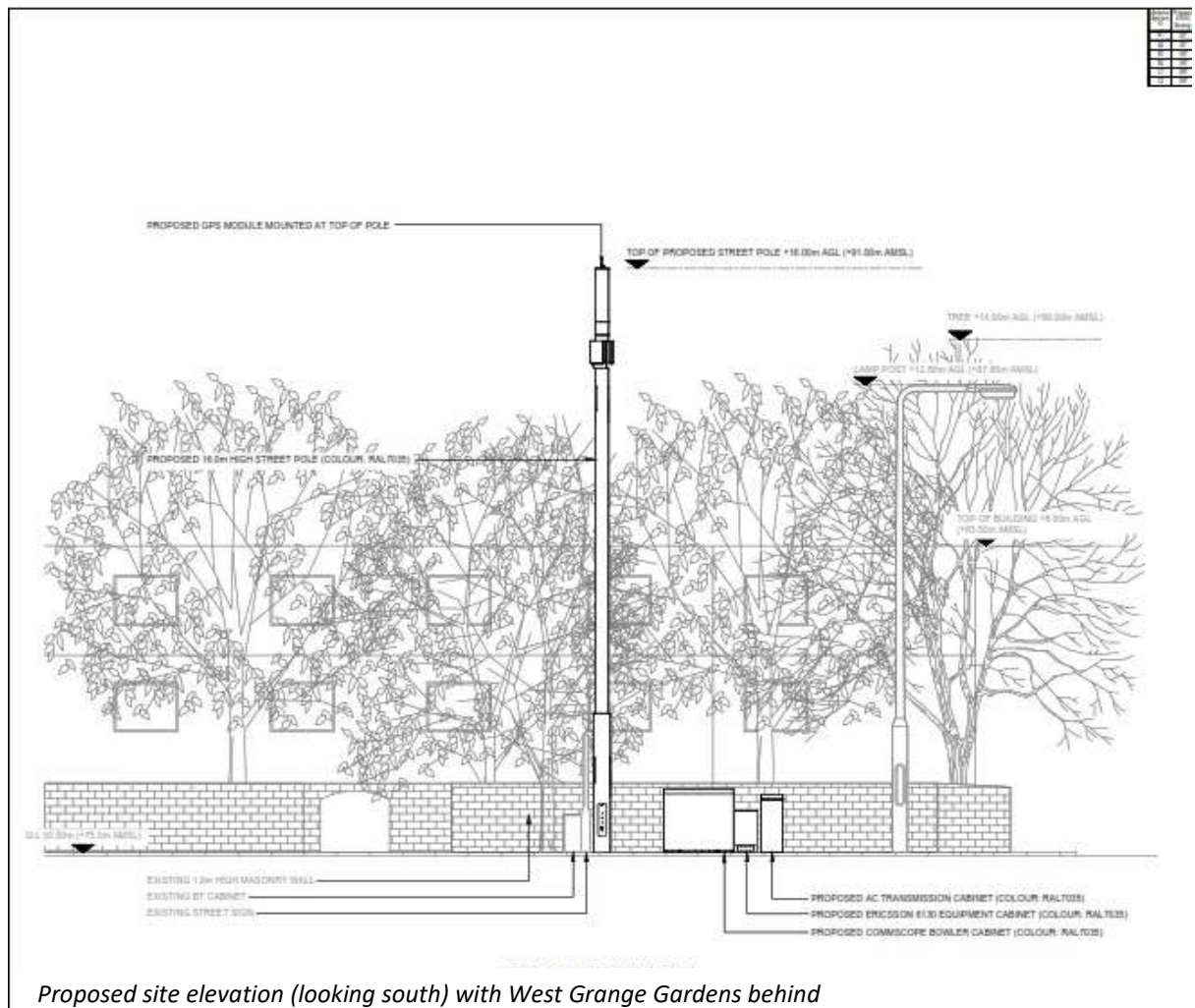
**OBJECTION from Grange Association**

**12 July 2023**

We object to the proposal to site a 16m high telecoms mast on this prominent site within the Grange Conservation Area. Our objections relate to three concerns:

- 1) The visual intrusion and incongruity with the Conservation Area;
- 2) The inappropriate siting of the cabinets in the middle of the pavement;
- 3) The potential noise nuisance from the cooling fans in the ground cabinets.

**1. The visual intrusion and incongruity with the Conservation Area**



The height of the proposed mast will dominate the skyline and the views along Grange Loan which is characterised by mature trees lining the residential street at the heart of the Grange Conservation Area.



Application site at Grange Loan / Blackford Avenue, looking West (Google streetview Sep-2022)

We note the recent refusal of similar applications [23/01490/FUL](#) and [22/04200/FUL](#) on Whitehouse Loan, also in a conservation area. In the Handling Report for the former application, explaining the refusal, the Case Officer wrote:

*“The proposal would be in a conspicuous location ..... The stark and utilitarian appearance of the mast and associated apparatus would create a visually discordant addition to the vicinity, which is characterised by mature landscaping, including a considerable number of mature trees.....”*

[...]

*“The proposal would have an adverse effect on the character and appearance of the conservation area by virtue of its utilitarian design, which would be in contrast to the mature, soft landscaped nature of the surrounding streetscape. There are no material considerations that outweigh this conclusion.”*

Likewise, for the latter application, [22/04200/FUL](#), the Case Officer found:

*“The development would disrupt the settled and mature character of the immediate vicinity, which is heavily influenced by soft landscaping and buildings formed in traditional and natural materials. It would erode the historic quality of the streetscape, to the detriment of the character and appearance of the conservation area.*

*“The proposal would have an adverse effect on the character and appearance of the conservation area and is unacceptable, having regard to Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.”*

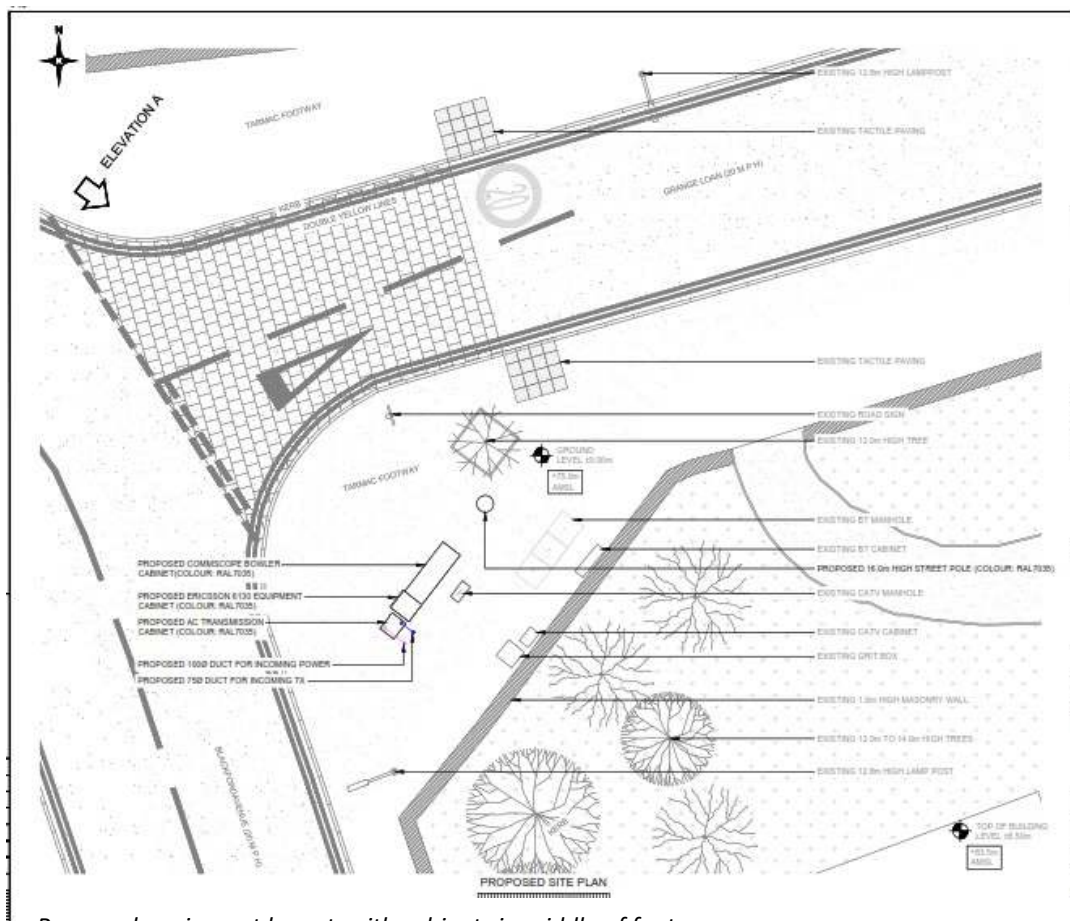
We concur with those opinions of the Case Officers and we request that the planning department maintains a consistent approach and likewise refuses planning permission for this 16m high mast on this landmark corner of the Grange Conservation Area.

## 2. The inappropriate siting of the cabinets in the middle of the pavement

The pavement at the corner of Grange Loan and Blackford Avenue includes a triangular area that is already home to a 10m tall tree, some small utilities cabinets, a grit bin and a 13m high streetlamp. However, these are all at the edges of the triangular area, leaving an uncluttered open footpath.



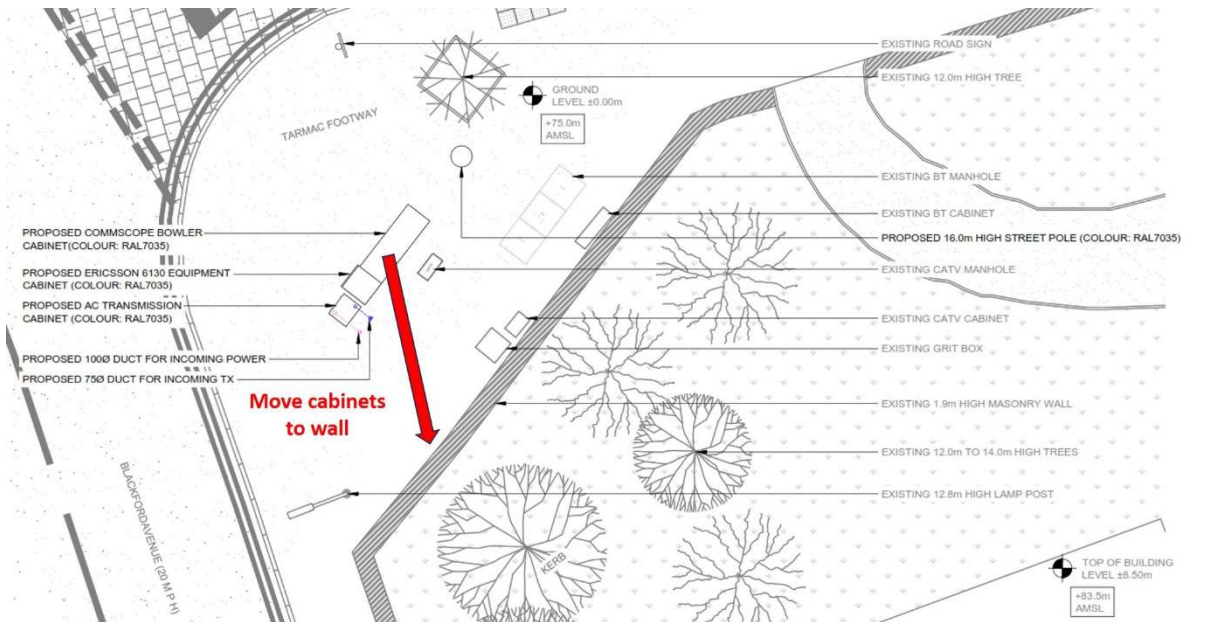
Grange Loan from Blackford Avenue – Google Streetview June 2023



Proposed equipment layout, with cabinets in middle of footway



The pavement has been marked up helpfully in yellow paint to indicate the proposed locations of the ground cabinets. This is visible in the streetview above. The cabinets would divide the pavement in two, effectively creating a narrow corridor for pedestrians and an obstacle to the desire lines for those crossing the road here. The cabinets would also be unnecessarily visually intrusive, dominating the streetview.



*Proposed relocation of cabinets*

We therefore request that, if you are otherwise minded to grant this application, you require the applicants to **relocate the proposed cabinets** (but not the mast) to the edge of the pavement, either at the kerbside or preferably against the wall of the adjacent property, as indicated above, beside the grit bin (which is not anchored and so could itself easily be moved if required). We recognise that this will entail some additional cost for the threading of cables around the existing utilities under the pavement but we consider this to be justified to protect the amenity of the footpath here.

### 3. The potential noise nuisance from the cooling fans in the ground cabinets.

The cabinets will contain fans to cool the electrical equipment. We have observed similar installations which, during recent hot weather, have been operating with noticeable noise. These sites are on busy roads (e.g. [Old Dalkeith Road](#)) or busy junctions (e.g. [Cameron Toll](#)) with no immediate neighbours and so the noise is not unduly disturbing. However, we are concerned that this site on Grange Loan is quiet, especially at night, with residents' bedrooms less than 15m from the proposed cabinets.

We are not aware of any regulations relating specifically to noise from telecoms installations such as these. However, we are aware of the constraints on microgeneration systems and on domestic installations such as Air-Source Heat Pumps. For these, the guidance from the Microgeneration Certification Scheme ([MCS 020](#)) is adopted, which requires that the noise measured at a residential property boundary should not exceed 42 dB(A). If the applicant cannot demonstrate that this criterion will be met under all equipment cooling conditions, then the design should be amended to incorporate acoustic hoods sufficient to meet it. **This noise limit should be a condition of any grant of planning permission** which would be subject to an Enforcement Notice if breached.

**Grange Association  
12 July 2023**