

**19 Grange Terrace EH9 2LF (Camilla House)**

**Planning Application 18/03581/LBC**

**OBJECTION from Grange Association**

**6 August 2018**

The Grange Association has reviewed application 18/03581/LBC, taking into account the setting within the Grange Conservation Area of 19 Grange Terrace and its neighbours. We note the proposals for minor internal works to improve facilities, which we welcome. However:

- ) The proposals include in drawing 25 (“proposed landscape plan”) “planting removed in this zone” relating to the area immediately behind the wall fronting Grange Terrace. There is no justification presented for this removal. There is currently car parking in use adjacent to that position and the proposed plans indicate no change of use. We therefore object to this unnecessary removal of soft landscaping.
- ) The proposals include, in drawing 03 (“proposed block plan”) and drawing 25, new illuminated external signage to be erected on the corner of Grange Terrace and Blackford Avenue. The drawings give no information about the height, format, colour, or materials of this new signage. The proposed signage is not shown in any elevation drawing.
- ) The Grange Conservation Area Character Appraisal (GCACA) recommends (page 33): *“Signage in relation to access to and management of multi-occupancy sites...requires sensitive design”*.
- ) Signage on the site was the subject of Enforcement reports 18/00228/EADV and 18/00239/EADV (the latter with the address incorrect) in April 2018. Although those reports were closed with no further action, the applicants will be well aware of the contentious nature of signage with local residents. It is therefore disingenuous to add the proposal for new illuminated signage disguised as a minor element within an LBC application. This should have been the subject of a separate explicit application for express consent for an advertisement, with associated neighbour notification.
- ) The application as submitted is principally for Listed Building Consent (LBC) for works to upgrade and improve the building, which we would welcome. The new signage is not identified in the title of the application (*“Minor internal works to improve facilities. Including the creation of en-suites, repurposing rooms and upgrading existing facilities. Alterations to existing landscaping and fencing”*) and we therefore consider the notification process to be flawed. Neighbours will have been misled by the title of the proposals and its status as a LBC and will not have been alerted to the inclusion of the proposal for new signage and thus not had the opportunity to comment on the proposal for the new signage.
- ) The application contains technical errors and inaccuracies. Location Plan (01) is of the wrong site, in Nitshill, Glasgow. “Existing Block Plan (02)” includes inaccurate out-of-date photographs. Photo 01 on that plan was taken before the erection of the signage that was the subject of the Enforcement reports above, and which remains in place, giving a misleading impression of the current frontage as viewed from Grange Terrace.

) Given the absence of information in drawings 03 and 25, and the inaccurate elevations and photos in block plan 02, the compliance of the application for new signage with the GCACA recommendation cannot be assessed. In combination with the absence of reference to signage in the title as advised to stakeholders, the application for new signage is seriously deficient and should be refused.

We request that the application be given a **Mixed Decision**, approving the internal works as you may otherwise see fit, but refusing the new signage and the removal of the soft landscaping against the Grange Terrace front wall. We do not wish to frustrate the aims of the property owners to improve the building internally.

We request that the applicants are not invited to withdraw or amend the proposals to remove the signage but rather are advised that their application has been treated as an application for express consent under the Town and Country Planning (Control of Advertisements) (Scotland) Regulations 1984 and that this refusal of consent shall be regarded as refusal for the purposes of Regulation 10 and specifically Regulation 10(2):

*“...in the event of refusal of consent, the provisions of this regulation whereby the display of advertisements may be undertaken without express consent shall not apply to the subsequent display on the same land of any advertisement by, or on behalf of, the person whose application was so refused”*

thereby requiring the applicant to submit a formal application for express consent for any new signage which will be open to comment by neighbours and other interested parties.

If, despite this objection, you were to be minded to grant express consent for an advertisement on the corner with Blackford Avenue, we ask that you should make that conditional on it not being illuminated and that any new advertisement should be a replacement for the sign currently above the wall on Grange Terrace, not as an additional sign, noting that the final arrangement should be as shown in drawing 25 (but not illuminated) with any signage not expressly shown in that drawing excluded from the consent.

Grange Association  
6 August 2018