

Response from Grange Park Conservation Area:**This is a specific response with regard to planning controls in Conservation Areas**

1. The DM (Development Management) policies are not specific enough to ensure high quality renovations and other development in conservation areas (CAs).
2. The draft local plan fails to address weaknesses in the current local plan in ensuring applicants understand how to commission alterations to buildings that are entirely compatible with the statements of significance of each conservation area. Planning officers do not feel they have the complete support of adopted policies to ensure detailed design features are replicated in changes, thus undermining designation.
3. Policy DM DE2 3a i a states a higher level of detail must be submitted for major or contentious schemes. All application in CAs should show a high level of detail. It is the detail that matters. How can a contentious scheme be identified before submission? Because it is already contrary to the local plan?
4. Policy SP DE4 3 states "The level of detail should be proportionate to both the significance of the heritage asset(s) affected and the scale of development". We strongly object. In Grange Park CA it is the small scale proposals which can have the greatest adverse impact of the features of significance such as the high quality of the joinery. All these impact on the Arts and Crafts nature of many of our significant properties. Enfield Council currently gives planning consent to applications which replace detailed window designs with simplified manufactured imitations. There seems to be an assumption that all development in a CA is of a larger scale. The character of the CAs is very different. In our CA most proposals are at a small scale. Policy should be drafted appropriately.
5. Policy DM DE10 fails to give a clear policy steer as to what is good design, how design details will be required in all proposals.
The policy seems to sit on the fence as to whether planning consent will be granted or not. What will be the outcome of implementing policy DM DE10 3 & 4? What do these clauses mean?
6. Policy DM DE10 5 gives us great concern. It is the incremental minor changes that undermine our designation. Para 7.10.6 contains policy statements which should be in the policy otherwise they cannot be implemented.
Para 7.10.6 also states "In some instances, replication and reference to the design characteristics of a heritage asset or area will be appropriate. In other cases, a contemporary and contextual design response may be more appropriate to conserving an asset's significance." How helpful/unhelpful is this to a property owner or a planning officer in assessing an application?
7. Policy DM DE15 sets out clear criteria for residential extensions. There is a clear explanation of

the policy re dormer windows in CAs. Why is a similar level of explanation not given to other types of residential developments in CAs subject to article 4 directions? We would like the council to encourage residents to bring forward high quality proposals which get planning consent, rather than poor quality plans which are refused or which have an adverse impact when built.

re Dormer windows - the paragraph/policy fails to mention front facing roof lights, which are not acceptable in a CA.

re outbuildings - the policy fails to take into consideration the increase in hard surfacing which reduces rainfall percolation and increased run off into neighbouring properties and street drains. We are on clay soil which needs rain water to be steadily percolating throughout the area. The increase in building on gardens and the diversion of rainfall into drains is causing the clay to dry out. The policy is not resilient to climate change.

8. There is nothing about the paving of front gardens and the impact on rain water run off. These are matters that are well covered in the Management Plans for our and I suspect most CAs in the Borough.