LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date: 1st September 2020

Report of Head Of Planning

Contact Officer: Andy Higham David Gittens Kate Perry Ward: Enfield Highway

Ref: 19/04103/FUL

Category: Major

LOCATION: Bell Lane Playing Fields, Bell Lane, Enfield EN3 5EG

PROPOSAL: Erection of a single storey Special Educational Needs and Disabilities (SEND) school building with associated landscaping, car parking and drop off facilities and alterations to existing access arrangements (Revised Drawings)

Applicant Name & Address:

Michael Frain
Department For Education
Sanctuary Buildings
Level 5
Great Smith Street
Westminster
SW1P 3BT

Agent Name & Address:

Laura Meyer GL Hearn 7th Floor Lee House 90 Great Bridgewater Street Manchester M1 5JW

RECOMMENDATION:

It is recommended that planning permission be GRANTED subject to Conditions and a S106 Agreement.

Ref: 19/04103/FUL LOCATION: Bell Lane Playing Fields, Bell Lane, Enfield, EN3 5EG ALDAINT PARK AVEN MEADOW CLOSE MEADOW 25 \Box Playing Fields 164 to 180 El Sub Sta THEIGHTS Reproduced by permission of Ordnance Survey on behalf of HMSO. ©Crown Copyright and Scale 1:1250 North database right 2013. All Rights Reserved. Ordnance Survey License number 100019820

1. **Note for Members**

1.1 This planning application is categorised as a "major dwellings" planning application and in accordance with the scheme of delegation, is reported to Planning Committee for determination.

2. Recommendation

- 2.1 That planning permission be GRANTED subject to the conditions
 - The development to which this permission relates must be begun not later than 1. the expiration of three years beginning with the date of the decision notice.

Reason: To comply with the provisions of S.51 of the Planning & Compulsory Purchase Act 2004.

2. Unless required by any other condition attached to this Decision, the development hereby permitted shall be carried out in accordance with the following approved plans and documents:

748 158 A	Proposed Demolition Plan
748 156 A	Proposed Elevations
748 153 A	Proposed First Floor
748 152 A	Proposed Ground Floor
748 154 A	Proposed Roof Plan
748 157 A	Proposed Sectional Elevations
748 155 C	Proposed Site Layout

Location Plan 748 150 A

748 151 A Existing Site Layout

Design and Access statement dated 22 March 2019

External Lighting Columns Elevations

JR19DE19-SP-06 Swept Path Analysis

14513-DWG-EX-0001 External Lighting Layout 14513-DWG-EX-0002 **External Lighting Layout** 14513-DWG-EX-0003 **External Lighting Layout**

Archaeological Report dated December 2016

Preliminary Ecological Report and Bat Survey dated 30 November 2016 Addendum to Preliminary Ecological Report dated 14 January 2019

Flood Risk Assessment and Surface Water Drainage Strategy dated 22 March 2019

Cricket net photos

J6/01070 MUGA fencing – Euroguard Rebound Fencing

Euroguard Rebound Fencing Specification

J6/01059 Site boundary fencing – 2.4m Euroguard Extra Fencing

J7/01166 Fencing Detail

J8/04018 Bow Top Fencing Detail

Anti- trap Bow Top Fencing Specification

Lighting Specifications dated 16 May 2019

Lighting Map

Lighting Report dated 17 May 2019

Sustainability Statement dated 10 June 2019

Noise Impact Assessment dated 6 November 2018

Arboricultural Impact Assessment dated 13 March 2019

Energy Assessment dated 26 March 2019

Demolition Statement dated March 2019 Transport Assessment dated 25 March 2019

Reason: In the interest of proper planning and for the avoidance of doubt.

- External Materials
- 4. Surfacing Materials
- 5. Details of Noise Levels in Relation to Plant / Ancillary Equipment
- 6. Construction Management Plan
- 7. Community Use Scheme

Details of a Community Use Scheme shall be submitted to and approved in writing by the Local Planning Authority, after consultation with Sport England. The Scheme shall include details of pricing policy, hours of use, access by non-school users/non-members, management responsibilities and include a mechanism for review. The approved Scheme shall be implemented upon commencement of use of the development.

Reason: To secure well managed safe community access to the sports facility, to ensure sufficient benefit to the development of sport and to accord with Policy.

- 8. Secure by Design Guide
- 9. Travel Plan
- 10. Construction Waste Management Plan
- 11. Bird Nesting Season
- 12. Bat Boxes / Ecological Mitigation
- 13. Energy Strategy Verification
- 14. Suds Strategy
- 15. Suds Verification
- 16. Tree Protection / Works
- 17. Employment Skills Strategy
- 18. Cycle Parking
- 19. Access Improvements
- 2.2 It is also requested that authority to finalise the wording of conditions under the above headings, is given to officers to ensure they reflect any issues raised by Planning Committee and / or any reported updates to the meeting.

3. Executive Summary

- The purpose of this application is to provide a special education needs and disabilities (SEND) school. The school will provide 70 school places for secondary school children (aged between 11 and 18 years) with social, emotional and mental health (SEMH) needs. It is expected that there will be 55-60 staff members.
- 3.2 The proposal seeks to address the current demand for Special Educational Needs and Disabilities within Enfield which currently has one special school for learners with SEMH which has 44 places. This proposal therefore forms part of a strategy by the Education department to create more capacity and continuity for this group and support transitions into provision post 16 which would include a full educational programme up until the age of 18/19.
- 3.3 Currently, there is insufficient provision for pupils with diagnosed and undiagnosed SEMH in the Borough. This proposal would address this issue. It would provide expert support both in terms of fulltime placements, part time assessment placements as well as a comprehensive outreach programme to support inclusion in the Borough's mainstream schools of pupils with SEMH. The new school has been commissioned by the London Borough of Enfield and will be operated by the Edmonton County Academy Trust ('The Trust').
- 3.4 While the proposal is sited on land designated as open space, the availability of suitable sites within the Borough accommodate a much needed enhancement to existing special educational needs is extremely limited and it is considered, significant weight should be given to the need on this site.
- 3.5 The reasons for recommending approval of this application are:
 - The principle of the development is appropriate given their size, form and detailed design.
 - The proposal would not have a detrimental impact on the character and appearance upon the school buildings or the wider area and would protect the openness of the land designated as local open space.
 - o The proposed development would meet an identified need for specialist educational facilities.
 - The development by virtue of its size, location and proximity would not harm the amenity of occupying and neighbouring residents.
 - The proposal would not cause any unacceptable harm upon highway safety or the flow of traffic in the locality.
 - The design and construction of the proposal would have appropriate regard to environmental sustainability issues including energy and water conservation, renewable energy generation, and efficient resource use.

- The proposed development would meet the Council's policy objectives in terms of climate change, low carbon energy and sustainable construction.
- The proposal would replace where required and protect trees of amenity and biodiversity value.
- 3.1 The development would be appropriate and in accordance with relevant National and Regional Policy, Core Strategy and Development policies and for the reasons noted above.

4. Site and Surroundings

- 4.1 The application site is located within a residential area and is located on the southern side of Bell Lane opposite Albany Park. The site is designated as a playing field and local open space.
- 4.2 There are existing sports facilities on the site in the form of tennis courts and a football pitch, but these are run down and unused.
- 4.3 Along the boundary with Bell Lane there are large grass bunds built across the entrance points and there is a 2.4m high chain link fence around the whole site to prevent unauthorised use.
- 4.4 The site is not located within a Conservation Area and does not contain a Listed Building. Furthermore, there are no trees on the site which are subject to a Tree Preservation Order, although there are mature trees around the perimeter of the site.

5.0 Proposal

- 5.1 Proposed is a development involving the erection of a special education needs and disabilities (SEND) school. The school will provide 70 school places for secondary school children (aged between 11 and 18 years) with social, emotional and mental health (SEMH) needs. It is expected that there will be 55-60 staff members.
- 5.2 The proposed building will be predominantly single storey with a taller central element containing the school hall.
- 5.3 There are 38 staff and visitor car parking spaces proposed, 3 disabled bays and 2 minibus bays. There will also be 8 short term drop off bays at the front of the school site.
- 5.4 Vehicular access and egress will be provided via an existing access point towards the north eastern corner of the site. Pedestrian access will be in the north western corner of the site.
- 5.5 An outdoor Multi Use Games Area (MUGA) is proposed to the rear of the school building, close to the western site boundary.

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6.0 Relevant Planning History

- 6.1 Pre-application advice was sought in respect of the proposed erection of special education needs and disabilities (SEND) school (19/03174/PREAPP) which supported the principle and highlighted a number of policy requirements that would need to be addressed.
- 6.2 TP/00/1250- Details of reserved matters in pursuant to Appeal reference APP/Q/5300/A/00/103779 for the redevelopment of site by the erection of three 3-storey blocks of 27 two-bed flats and 21 two and three-storey houses (comprising 14 three-beds and 7 four-beds) together with associated garaging, cycle store facilities and new access road of Greenwood Avenue. (Reserved matters from outline consent allowed on appeal under Ref: TP/99/0628)- Approved 22/11/2000
- 6.3 TP/99/0628- Redevelopment of part of school playing fields for residential purposes (Outline)- Refused 26/08/1999. Appeal allowed subject to conditions 01/08/2000.

7.0 Consultations

Statutory and non-statutory consultees

Internal

- 7.1 Traffic and Transportation: Further revisions to the plans are being sought to ensure an appropriate level of parking is being provided to provide 46 and, on this basis, the proposal is considered to be acceptable.
- 7.2 Environmental Health: No objections as there is unlikely to be a negative environmental impact. Conditions have been recommended.
- 7.3 Tree Officer: The loss of the Category A tree is not supported but the constraints are recognised as is the level of retained / replacement planting which is replaced by car parking. Suggests re-looking at the front parking layout/ soft landscaping so that the tree can be retained. It is considered a condition covering this aspect and to address this concern can be imposed if necessary. The overall approach to tree retention / planting is covered in the Analysis.
- 7.4 SUDs Officer: No objections subject to conditions:
- 7.5 Urban Design Officer: Concerns have been raised regarding the form and appearance of this development in terms of its design and appearance relative to the Bell Lane and the wider area. Revisions have been received on matters relating to materials, elevational details and the treatment of the parking / access area to the front of the school. These elements will be addressed in the Analysis section of the report.
- 7.6 Planning Policy: Acknowledge the policy designation of the land as Local Open Space and playing field but recognise concerns about the loss of such space can be

offset due to the circumstances of the proposals in terms of educational need, land availability and design.

External

- 7.7 Designing Out Crime Officer: No objection subject to a secure by design condition and informative:
- 7.8 Thames Water: No objections.
- 7.9 London Fire Brigade: No comments received
- 7.10 Sport England: Comments awaited on revised plans but no objection in principle subject to delivery of MUGA

Public

- 7.11 345 neighbouring residential occupiers were notified in respect of the proposal. There have been 3 rounds of public consultation. The first was between 13.12.2019 and 3.1.2020, the second between 4.6.2020 and 18.6.2020 and the third between 30.7.2020 and 13.8.2020.
- 7.12 One objection has been received to each round of public consultation. The objections received from rounds 2 and 3 are from the same person. The following objections have been raised (in summary):
 - Affect local ecology
 - Close to adjoining properties
 - Conflict with local plan
 - General dislike of proposal
 - Inadequate access
 - Inadequate parking provision
 - Increase danger of flooding
 - Increase in traffic
 - Increase of pollution
 - Loss of parking
 - Loss of privacy
 - Noise nuisance
 - Out of keeping with character of area
 - Over development
 - Strain on existing community facilities
 - Already overrun with schools in the locality and this would make five special needs schools within one mile which is unfair to the residents when there is plenty of land available in western Enfield.
 - There are already parking issues as a result of the existing educational facilities and excess traffic flow using the residential streets as cut throughs for drop offs. Bell lane is already difficult to navigate due to parking issues

and this application will expand on that problem added to the extra strain on access to Albany Park Avenue with extra staff parking and the construction site staff who will require parking facilities

- Overload the local facilities
- Increase in noise
- Loss of privacy
- Increased pollution.
- The road located at the back end of the development is not wide enough for access and will impact local residents by increasing traffic to narrow streets.
 Enfield has won a grant to develop
- Should be used for environmental projects rather than a school

8.0 Relevant Planning Policies

8.1 <u>London Plan (2016)</u>

Policy 3.16 Protection and Enhancement of Social Infrastructure

Policy 3.18 Education Facilities

Policy 5.1 Climate change mitigation

Policy 5.2 Minimising carbon dioxide emissions

Policy 5.3 Sustainable design and construction

Policy 5.7 Renewable energy

Policy 5.10 Urban greening

Policy 5.11 Green roofs and development site environs

Policy 5.12 Flood risk management

Policy 5.13 Sustainable drainage

Policy 5.14 Water quality and wastewater infrastructure

Policy 5.15 Water use and supplies

Policy 5.16 Waste self sufficiency

Policy 6.9 Cycling

Policy 6.13 Parking

Policy 7.4 Local character

Policy 7.6 Architecture

Policy 7.19 Biodiversity and Access to Nature

8.2 The London Plan – Intend to Publish

A draft London Plan was published on 29 November 2017 for consultation purposes with a deadline for consultation of 2 March 2018. The current 2016 (The London Plan consolidated with alterations since 2011) is still the adopted Development Plan, but the Draft London Plan is a material consideration in planning decisions. The significance given to it is a matter for the decision makers, but it gains more weight as it moves through the process. It is anticipated that the publication of the final London Plan will be in the later end of 2020, and as such its weight, as a material consideration, is increasing.

In the circumstances, it is only those policies of the Intention to Publish version of the London Plan, that remain unchallenged to which weight can be attributed.

Policy GG1 - Building Strong and Inclusive Communities

Policy GG2 - Making the Best Use of Land

Policy GG3 – Creating a Healthy City

Policy D1 – London's Form, Character and Capacity for Growth

Policy D2 – Infrastructure Requirements for Sustainable Densities

Policy D4 – Delivering Good Design

Policy D5 - Inclusive Design

Policy D8 - Public Realm

Policy D11 – Safety, Security and Resilience to Emergency

Policy D12 – Fire Safety

Policy D14 - Noise

Policy S3 – Education and Childcare Facilities

Policy S5 – Sports and Recreation Facilities

Policy G3 - Metropolitan Open Land

Policy G4 - Open Space

Policy G5 - Urban Greening

Policy G6 - Biodiversity and Access to Nature

Policy SI1 - Improving Air Quality

Policy SI2 - Minimising Greenhouse Emissions

Policy SI4 – Managing Heat Risk

Policy SI12 - Flood Risk Management

Policy SI13 - Sustainable Drainage

Policy T1 – Strategic Approach to Transport

Policy T4 – Assessing and Mitigating Transport Impacts

Policy T5 - Cycling

Policy T6 - Car Parking

Policy T7 – Deliveries, Servicing and Construction

Policy DF1 – Delivery of the Plan and Planning Obligations

8.3 Core Strategy (2010)

CP8	Education
CP20	Sustainable Energy use and Energy Infrastructure
CP21	Delivering Sustainable Water Supply, Drainage and Sewerage Infrastructure
CP22	Delivering Sustainable Waste Management
CP30	Maintaining and Improving the Quality of the Built and Open Environment
CP33	Green Belt and Countryside
CP34	Parks, Playing Fields and Other Open Spaces
CP36	Biodiversity

8.4 Development Management Document

DMD16	Provision of New Community Facilities
DMD37	Achieving High Quality and Design-Led Development
DMD38	Design Process
DMD42	Design of Civic Buildings
DMD45	Parking Standards and Layout
DMD47	New Roads, Access and Servicing
DMD49	Sustainable Design and Construction Statements
DMD51	Energy Efficiency Standards
DMD53	Low and Zero Carbon Technology
DMD57	Responsible Sourcing of Materials, Waste Minimisation and Green
	Procurement
DMD58	Water Efficiency
DMD59	Avoiding and Reducing Flood Risk
DMD60	Assessing Flood Risk
DMD61	Managing Surface Water
DMD71	Protection and Enhancement of Open Space
DMD74	Playing Pitches
DMD78	Nature Conservation
DMD79	Ecological Enhancements
DMD80	Trees on Development Sites
DMD81	Landscaping

8.5 Other Material Considerations

National Planning Policy Framework (NPPF) National Planning Practice Guidance (NPPG)

9.0 Summary of Key Reasons for Recommendation

- 9.1 The reasons for recommending approval of this application are:
 - The principle of the development is appropriate given their size, form and detailed design.
 - The proposal would not have a detrimental impact on the character and appearance upon the school buildings or the wider area and would protect the openness of the land designated as local open space.
 - The proposed development would meet an identified need for specialist educational facilities.
 - The development by virtue of its size, location and proximity would not harm the amenity of occupying and neighbouring residents.

- The proposal would not cause any unacceptable harm upon highway safety or the flow of traffic in the locality.
- The design and construction of the proposal would have appropriate regard to environmental sustainability issues including energy and water conservation, renewable energy generation, and efficient resource use.
- The proposed development would meet the Council's policy objectives in terms of climate change, low carbon energy and sustainable construction.
- The proposal would replace where required and protect trees of amenity and biodiversity value.

10. Analysis

Principle of Development

Educational Need

10.1 The proposals are considered in the context of relevant education related policy. Policy 3.18 (Education Facilities) of the London Plan 2016 states that:

"The Mayor will support provision of childcare, primary and secondary school, and further and higher education facilities adequate to meet the demands of a growing and changing population...Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing or change of use to educational purposes. Those which address the current and projected shortage of primary school places and the projected shortage of secondary school places will be particularly encouraged."

10.2 The policy continues and states that:

"In particular, proposals for new schools, including free schools should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the appropriate use of planning conditions or obligations."

10.3 Policy 3.18 also states that:

"Development proposals which maximise the extended or multiple use of educational facilities for community or recreational use should be encouraged."

10.4 Strategic Objective 5 of the Enfield Core Strategy 2010 (Education, health and wellbeing) seeks to ensure the capacity and quality of local social infrastructure provision, including schools, is sufficient to meet the needs of Enfield's existing population and new residents and address the inequalities in educational attainment between Enfield's residents particularly in areas such as Edmonton Green, Enfield Highway, Ponders End, Turkey Street and Upper Edmonton, where these issues are more prevalent.

- 10.5 The proposals must also have regard to Policy 8 (Education) of the Core Strategy which seeks to contribute to improving the lives and prospects of children and young people by supporting and encouraging provision of appropriate public and private sector pre-school, school and community learning facilities to meet projected demand across Enfield. It states that new facilities should be provided on sites that offer safe and convenient access by pedestrians, cyclists and public transport users, and schools will be encouraged to allow the use of buildings for other community purposes in the evenings and at weekends.
- 10.6 Having regard to the above policies, it is clear that the principle of providing new or enhanced educational facilities is strongly supported by adopted policy and the strategic aims of the Council. This constitutes significant weight in favour of the proposed development when balancing the merits of the scheme
- 10.7 It should also be noted a community use plan has been submitted to show the parts of the premises which will be available for use by the community outside of school hours which is also a benefit associated with the development.
- 10.8 However, whilst the principle of providing an educational facility is supported, there are other in principle matters that must be addressed in this case. These include the principle of development on designated local open space and playing fields.
 - Loss of designated Local Open Space
- 10.9 The proposal must be considered in light of the policy designation of the site as local open space.
- 10.10 Core Policy 34 (Parks, Playing Fields and Other Open Spaces) of the Enfield Core Strategy 2010 states that the Council will protect and enhance existing open space and seek opportunities to improve the provision of good quality and accessible open space in the Borough. DMD policy 71 goes on to state:
 -"Development involving the loss of other open space will be resisted unless:
 - a. Replacement open space can be re-provided in the same locality and of better quality to support the delivery of the Council's adopted Parks and Open Spaces Strategy; or
 - b. It has been demonstrated through the submission of an assessment that the open space in question is surplus to requirements."
- 10.11 This proposal has been accompanied by an Open Space Assessment which has demonstrated that the open space in question is surplus to requirements and moreover, hasn't been used for the purpose for many years. Together with the community access to facilities, on this basis the proposal is considered to comply with part b of Core Policy 34.
 - Loss of Natural Playing Fields
- 10.12 Following on from the loss of the local open space, the effect on the existing natural playing field must also be considered. Paragraph 97 of the NPPF is concerned with

the loss of playing fields. It states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.
- 10.13 The NPPF is supported by Policy DMD 74 which seeks to resist the loss of natural playing pitches unless it can be demonstrated that the loss is clearly outweighed.
- 10.14 In this case, the site has not been used as a playing pitch for many years (at least since 2002) and is overgrown and unmarked. Despite being allocated as a playing pitch, the site is not used for this function and its use for an alternative much needed educational facility is therefore accepted in this case.
- 10.15 Nevertheless, it is considered appropriate as part of the compensation for the loss of the local open space, there should be a contribution towards enhancements to existing open space in close proximity. Discussions are ongoing and this will be updated at meeting.

Impact on the Character of the Area

- 10.16 The NPPF (section 12) confirms that the Government attaches great importance to the design of the built environment, with good design being a key aspect of sustainable development. London Plan policies 7.4, 7.5 and 7.6 confirm the requirement for achieving the highest architectural quality, taking into consideration the local context and its contribution to that context. Design should respond to contributing towards "a positive relationship between urban structure and natural landscape features..."
- 10.17 Civic buildings are required by DMD42 to be of a high standard and prominence within their community. They need to communicate their importance and function through architectural cues; they should positively address the public realm; have entrances which are prominent; and be designed to accommodate alternative uses.
- 10.18 The proposed school would introduce a contemporary building that, by virtue of its form and materials, would change the relationship of the site to the wider area. There has been extensive discussion with the applicant design team about this proposal and concerns have been identified, particularly in relation to the amount and prominence of car parking at the front of the site, the legibility of the site and particularly the identification of the entrance, and the design of the building and the relationship between the single storey and 2 storey elements. However, following revisions, it is considered on balance, the proposed elevational treatment and design addresses its relationship with the character and appearance of the wider site.

- 10.19 Although the development would not present a physically strong building presence on the frontage to Bell Lane as normally encouraged especially for a civic building, there are particular requirements associated with a SEND school that dictate the need for parking / drop off in front of the school dictating its set back away from the main road frontage.
- 10.20 Following negotiation, revisions have been received to enhance the frontage and the appearance relative to the street scene together with improvements to the detailing of the building. These include:
 - omission of render from front façade;
 - ii) replace render with the dark brick;
 - iii) recreate the lower datum level in the same dark brick but with a different bonding of expressed headers;
 - iv) additional large window added to the library; and
 - v) sports hall render retained but simplified with omission of colour stripes and colour.

10.21 In addition:

- a direct alternative pedestrian path from Bell Lane to the visitor entrance has been added to provide a route that is separated from any possible vehicular movement.
- ii) additional tree, shrub and hedge planting had been incorporated to the site's frontage and car park area.
- the tree planting has been increased from a total of 8 to 16 across the site with most of these being located to the front of the school.
- iv) an extra 100m2 of shrub planting to the frontage has also been provided. This provides a softer view into the site from Bell Lane as well as providing an additional buffer zone between the pedestrian footpath and the road without loss of parking numbers;
- v) the southern play space has been adjusted by moving some of the hardstanding area from the east side of the southern play area and adding it to the west side of the play area to allow for emergency vehicle turning area with no loss to the over play space area.
- 10.22 Taking all material considerations into account, it is felt the scheme has progressed to ensure it would sit comfortably within its environment
- 10.23 In terms of the building design, it would be a mainly single storey with a central courtyard and projecting taller element which would accommodate the school hall which would rise above the adjacent buildings, its location to the centre of the site within an inner courtyard, detailed design relief to the facades and elements of depth, would provide a degree of variation which would break up the façade and lessen its impact. As a result, the additional height compared with its neighbouring educational buildings is not considered to be detrimental from a design or scale perspective.

Impact on Neighbouring Properties

Light and Outlook

10.24 The proposal is single storey in the main and the separation from the nearest residential properties means that the development would not result in an unacceptable loss of light or outlook for the nearest residential occupiers. The 2 storey element is located relatively centrally in the site/ away from the boundaries which will minimise any impacts.

Noise and General Disturbance

- 10.25 Paragraph 180 of the NPPF considers noise impacts of development. It confirms that policies and decisions should aim to:
 - avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;
 - mitigate and reduce to a minimum other adverse impact on health and quality of life arising from noise from new development, including through the use of conditions;
 - recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established; and
 - identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.
- 10.26 London Plan Policy 7.15 encourages development proposals to manage noise through appropriately locating noisy activity away from noise sensitive receptors or through mitigation where appropriate. Core Policy 32 recognises the noise pollution should be minimised and DMD68 provides the criteria upon which developments will be assessed.
- 10.27 Having regard to the current proposal, the development will result in the replacement of open space with a school. This will undoubtedly result in some additional noise and general disturbance for the nearest residential occupiers. However, it is considered that the proposals are unlikely to have an unacceptably detrimental impact particularly having regard to the separation to the neighbouring residential occupiers and the suburban setting where this type of development is to be expected. It should also be noted the use of the site as playing fields would also have generated a degree of noise and disturbance when in use.
- 10.28 The Council's Environmental Health Officer has considered the proposed development and has not raised any objections. Conditions in relation to contamination, emissions standards and provision of a construction management plan and acoustic report are recommended.

Lighting

- 10.29 The NPPF advises that through the encouragement of good design, policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. The supporting text to London Plan policy 7.5 confirms the balance that must be struck between issues of safety / security and reducing light pollution. Core Policy 32 recognises the need to minimise light pollution and DMD69 confirms that development which results in light pollution that has a harmful impact on local amenity, nature conservation/wildlife and environment will not be permitted. Restrictions on the hours of operation may be imposed.
- 10.30 A Lighting Statement has been produced by Roger Park Associates Limited, which outlines the external lighting scheme to be prepared for the development. The design will seek to minimise the number of luminaires used and provide only the lighting levels required for safe access and use of the site, while also recognising the location, ecological and wildlife requirements.
- 10.31 The proposed lighting scheme shall incorporate column-type fittings to provide general illumination to the on-site pedestrian routes, footpaths and parking facilities. No lighting will be provided to the sports facilities or the landscaping surrounding these facilities, lighting to the adjacent roads and spaces will form part of the overall development plan. LED light sources will be used for all the columns, ground and wall mounted fittings throughout to provide an energy efficient solution. Columns are expected to be no higher than six metres in the parking areas. The wall mounted fittings are generally mounted at 2.8 metres AFFL around the building. Furthermore, all the lanterns will be mounted at a zero inclination and incorporate a flat glass protector, this will result in no upward light spill; providing a scheme compliant with the International Dark Sky Associations and The Institution of Lighting Professionals (ILP) requirements for a 'dark sky' design.
- 10.32 It should also be noted that all external site lighting will be controlled by a photocell and time switch arrangement to ensure that the luminaires are only in operation when required and that their hours of operation can be controlled and seasonally adjusted.
- 10.33 This is considered acceptable in relation to the aforementioned policies

Access, Parking and Highways

10.34 Policy 6.3 of the London Plan requires that the impact of development proposals on transport capacity and the transport network are fully assessed. The proposal must comply with policies relating to better streets (Policy 6.7), cycling (Policy 6.9), walking (Policy 6.10), tackling congestion (Policy 6.11), road network capacity (6.12) and parking (Policy 6.13). Policies DMD45 and 47 provide the criteria upon which developments will be assessed with regard to parking standards / layout and access /servicing.

Trip generation

10.35 The Transport Assessment supporting the application includes a trip rate assessment using information for pupils from an existing school and local travel to work mode share from the 2011 Census. In this worst case scenario, there would be 108 entries

and 70 exits by vehicles in the school's AM peak. Whilst this is an increase in trips on the local highway network, the applicant indicates that this will be between 07:30 and 08:00, so is outside of the general AM peak period, and that pupil arrivals will be staggered to smooth flows. In addition, the number of staff trips is likely to be lower because only 25 parking spaces are being provided (less than the 35 in the worst case scenario) and permits are being restricted. Therefore, on balance, whilst there will be an increase in private vehicle trips on the local highway network, the applicant is seeking to put in place mitigations so that this does not have a significant impact.

10.36 As well as trip generation, junction analysis has been undertaken which indicates that at some local junctions there will be significant increases in flows. However, this is in the context of existing flows being low. There is an indication that the development will lead to increased queue lengths on the Eastfield Road junction and that the junction will be over capacity in the PM peak. This is a cause for concern and, whilst the Transport Assessment suggest that for a variety of reasons (including changes to driver behaviour and changing mode shares) in reality the impact will not be a significant as the modelling suggest, there is clearly a need to monitor the situation with a view to taking remedial action.

Pedestrian and Cyclist Access

- 10.37 The proposal is for an existing access point on the west of the site to be utilised and a route with a minimum width of 2.8m to be provided for pedestrians and cyclists. Given the likely volumes of pedestrians and cyclists are likely to be relatively low (due to both the type of school provision and the size of facility) this approach is acceptable.
- 10.38 There does appear to be an area of land separating the application site from public highway. Land ownership and access rights is not usually a material planning consideration, however in this instance it is key to the delivery of a safe and convenient pedestrian and cyclist access so clarification should be sought from the applicant.

Vehicular access:

- 10.39 It is proposed that new gated vehicular access is provided from the public highway, with gates set back 8.6m from the edge of the kerb, which is acceptable in this location. The final design and delivery of the new access should be agreed with the local Highway Authority so a planning condition will be required. There should also be a commitment by the applicant to cover the cost of the new access and, if necessary, to enter into a legal agreement in relation to works on the public highway.
- 10.40 In addition, the applicant will need to cover the cost of removing the traffic island near to the proposed access and providing markings, signage as well as a related traffic order to provide waiting restrictions and school keep clear markings at the entrance to the site.
- 10.41 It is noted that the proposal is for an internal loop road which will provide a vehicle circulation route through the site. Vehicle tracking for the largest vehicle regularly

- serving the site (a 10.0m refuse vehicle) has been provided so this approach is acceptable.
- 10.42 A drop off facility is being provided to the front of the school building. Whilst regional transport policy would discourage a facility which encourages the use of private vehicles, given that this is a specialist type of school provision for children with particular needs, this approach is acceptable in this instance.

Car parking:

- 10.43 There are not specific parking standards for schools, so vehicle parking provision is based on the specific needs of the pupils and the staff required to operate the school. Given this there are 52 car parking spaces proposed:
 - 25 spaces for staff permit holders.
 - 8 drop off spaces for parents / carers.
 - 16 spaces for flexible use during peak drop off time and off peak for visitors, deliveries etc.

Of these 3 (equivalent to 5%) will be disabled parking spaces. It is recommended that the applicant should indicate how a further 5% of spaces could be enlarged to provide additional disabled parking provision if required in the future.

- 10.44 There will also be 20% of spaces with electric vehicle charging points and a further 10% with passive provision which is in line with policy requirements.
- 10.45 Parking provision on site has been informed by a number of factors including the desire to incorporate more planting amongst the parking area to improve the overall visual amenities and setting for the development. In addition, it is also noted that the applicant has committed to promote sustainable travel by the school community via a Travel Plan which includes details of the operation of the staff permit scheme. This includes only staff living beyond 20-minute walk/cycle time from the site or 60 minutes public transport journey being entitled to a parking permit. This is a progressive approach which is strongly supported. Therefore, the overall level of staff parking and proposed mitigation measures are supported although discussions are on-going on the final detail. Any update will be provided at the meeting.
- 10.46 As noted before the drop off / pick up facilities are more extensive than would usually be acceptable. However, as the supporting Transport Assessment points out "Pupils attending the school will be required to be accompanied to the school building...", which means that dwell times will be much higher than for other school settings. Therefore, this approach is acceptable in this instance.
- 10.47 As well as the car parking spaces, 2 minibus spaces are being provided which is acceptable.

Cycle parking:

10.48 20 covered and secure cycle parking spaces are being provided which is acceptable.

Highway safety:

10.48 The detailed analysis of recorded collisions in the vicinity of the site indicates that the numbers have not been significant in relation to overall vehicles flows and that close to the site there are not any recurring features which should be addressed. However, it is noted that there will be increased vehicle flows in the vicinity of the site which will have an impact on pedestrians and cyclists. Therefore, a transport measures contribution is appropriate to improve pedestrian and cycling facilities.

Refuse and recycling:

10.49 The proposed arrangements for a refuse vehicle to access the site are acceptable.

Mitigation measures:

- 10.50 It is welcome that a draft Travel Plan has been provided and that the applicant is committed to promoting sustainable travel by the school community within the operational and resource constraints of a SEND school. The final version should be secured by way of a planning condition and obligation.
- 10.51 Given the negative impact on the Eastfield Road / Hertford Road junction there should also be contribution to support ongoing capacity monitoring and if required minor works together with a contribution to improve pedestrian and cycle access to and from the site as indicated in 7.13 of the Transport Assessment.
- 10.52 Details on this point are being finalised and an update will be provided at the meeting.

Construction traffic:

10.53 The scale of the development requires the provision of a separate Construction Traffic Management Plan.

Conclusion:

10.54 Subject to the clarifications, conditions and contributions as set out above, T&T have no objection to this proposal.

Climate Change - Sustainable Design and Construction

Biodiversity / Ecology

- 10.55 Policy 7.19 of the London Plan ("Biodiversity and access to nature") requires development proposals to make a positive contribution, where possible, to the protection, enhancement, creation and management of biodiversity. Furthermore, Core Policy 36 of the Core Strategy confirms that all developments should be seeking to protect, restore, and enhance sites while Policy DMD79 advises that onsite ecological enhancements should be made where a development proposes more than 100sqm of floor space, subject to viability and feasibility.
- 10.56 A habitat / ecological survey has been submitted and that confirms there are no habitats on site which were identified as requiring any legal protection.

In terms of protected species. no trees or buildings within the site have been identified as containing features with potential to support roosting bats although it is recommended thought should be given to appropriate considerate lighting, to prevent any new light spillage in the direction and vicinity of the existing adjacent trees and gardens; which would maintain dark commuting corridors for bats. As identified in an earlier section, the lighting is considered to be acceptable in this regard.

- 10.57 All birds, their nests and eggs are protected under the Wildlife and Countryside Act 1981 and it is illegal to take, damage or destroy the nests of wild birds whilst being built or in use. It is recommended that all vegetation clearance and any building demolition works be undertaken outside of the breeding bird season (nesting March to August, inclusive). If this is not feasible, then a survey of all vegetation to be disturbed should be performed within a 48 hour period prior to works, to identify any nests present. Should any active nests be found, then all work in these areas will have to wait until all young have fully fledged. A condition to this effect is recommended.
- 10.58 It is also noted that the report recommends the placing of bird boxes on trees and buildings would be favourable, as would be the erection of bat boxes. Also, log piles could be created from any felled trees, creating extra hibernation and refuge sites for invertebrates and small mammals. Wildlife areas provide an important. A condition to this effect is recommended

Energy

- 10.59 Policy DMD 51 sets out the Councils energy efficiency standards. All developments will be required to demonstrate how the proposal minimises energy-related CO2 emissions in accordance with the following energy hierarchy:
 - a. Maximising fabric energy efficiency and the benefits of passive design;
 - b. Utilising the potential for connection to an existing or proposed decentralised energy network in accordance with DMD 52 'Decentralised Energy Networks';
 - Demonstrating the feasibility and use of low or zero carbon technology in accordance with DMD 53 'Low and Zero Carbon Technology'; and, where applicable,
 - d. Financial contributions
- 10.60 Paragraph 148 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure. In this regard, the applicant has provided an Energy Statement that confirms the proposals would meet the 35% CO2 reduction over Part L of Building regulations (2013). This will be achieved through the installation of photovoltaic panels. This shall be conditioned to ensure the energy performance.

10.61 The application is accompanied by a BREEAM pre-assessment which indicates a 'Very Good' rating for the scheme. The assumptions made are reasonable and in relation to the above potential condition have committed to continued monitoring of energy performance. The building has been designed to minimise energy consumption by using passive design features, such as: thermal insulation bettering Building Regulations Part L (2013) values, suitable glazing with sufficient g-values to control heat losses, heat gains and daylighting, optimising fabric air permeability; implementation of passive natural ventilation and hybrid natural ventilation, efficient lighting and lighting control, low NOx condensing boilers and water heaters, and heat recovering units to pre-heat air.

Sustainability and Sustainable Drainage Systems (SuDS)

- 10.62 London Plan policies 5.12 and 5.13 require the consideration of the effects of development on flood risk and sustainable drainage respectively. Core Policy 28 ("Managing flood risk through development") confirms the Council's approach to flood risk, inclusive of the requirement for SuDS in all developments. Policy DMD59 ("Avoiding and reducing flood risk") confirms that new development must avoid and reduce the risk of flooding, and not increase the risks elsewhere and that Planning permission will only be granted for proposals which have addressed all sources of flood risk and would not be subject to, or result in unacceptable levels of flood risk on site or increase the level of flood risk to third parties.
- 10.63 DMD61 ("Managing surface water") requires the submission of a drainage strategy that incorporates an appropriate SuDS scheme and appropriate greenfield runoff rates.
- 10.64 The site is located in Flood Zone 1 and is not at risk of flooding from rivers or seas. From the available information, surface water, groundwater and artificial sources are considered to present low risks of flooding to the site.
- 10.65 All types of development including 'More Vulnerable' developments are considered appropriate land uses within Flood Zone 1. The proposed development is therefore appropriate in the context of current National Planning Policy, and the proposals are considered appropriate for the site location.
- 10.66 In light of the above, the SuDS approach is acceptable; however further details are required and shall be secured by conditions.

Trees and Landscaping

- 10.67 Policy DMD 80 retains and protects trees of amenity and biodiversity value on the site and in adjacent sites that may be affected by proposals. Policy DMD 81 ensures development must provide high quality landscaping that enhances the local environment. Policy DMD 78 and 79 ensures ecological enhancement from sites.
- 10.68 All trees on site, however, fall outside of a conservation area and no trees are covered with a designation (Trees in the conservation areas are statutorily protected Tree Preservation Order).

- 10.69 The general presumption is that the loss of mature trees will be resisted, and it is considered there has to be good justification for this to be permitted.
- 10.70 It is acknowledged that a category A tree located on the eastern boundary is proposed to be removed. While it is recognised as being less than ideal, this has to be balanced against other development considerations including the design and appearance of the development, the design and appearance of the frontage parking / drop off area the fact the tree in question forms part of a row of trees along this boundary. IT should also be noted that discussions have resulted in the number of trees being planted on this site from 8 to 16.
- 10.71 The retention of the tree would result in the loss of 3 parking spaces and looking at the proposal in the round, and the need to ensure there is an appropriate number of spaces available to support the operation of this use, for which the need has been established, it is considered on balance, the loss of the tree with the replacement planting, can be accepted.

Secure by Design

10.72 Following consultation with the Metropolitan Police Service (MPS) Designing out Crime team, the project has the potential to meet the criteria for Secured by Design Accreditation. The MPS have recommended a condition that the development shall achieve a certificate of compliance with the secured by design credentials. The scheme may not be able to comply with all criteria for Secured by Design and consequently, other conditions will be attached requiring details of external lighting and enclosure to prevent any increase in crime and anti-social behaviour in the locality.

Employment and Skills

- 10.73 There is a requirement for an Employment and Skills Strategy in accordance with the provisions of the Enfield Section 106 SPD. The Council is committed to maximising the number and variety of jobs and apprenticeships available to residents of the borough and maintaining and encouraging the widest possible range of economic activity, including the availability of a skilled labour force. To this end, the Council will seek agreement with developers to secure appropriate planning obligations for employment and training initiatives as part of development proposals. The Council is committed to maximising the number and variety of jobs and apprenticeships available to residents of the borough and maintaining and encouraging the widest possible range of economic activity, including the availability of a skilled labour force.
- 10.74 In the interest of being positive and pro-active, aiming to avoid any s106 agreement which might delay the development, the Local Planning Authority has agreed that Employment and Skills Strategy in accordance with the provisions of the Enfield Section 106 SPD, could be secured through a planning condition.

11 Section 106 (S106) Obligations

11.1 As part of the compensation for the loss of the local open space, it has been suggested it would be beneficial to enter a S106 to enhance an existing open space

- in close proximity. Discussion regarding this are ongoing and an update will be provided at the meeting.
- 11.2 There are also possible requirements in respect of transportation and an update on this will also be provided ahead of the meeting once discussions have finalised.

Community Infrastructure Levy (CIL)

- 12.1 As of the April 2010, legislation in the form of CIL Regulations 2010 (as amended) came into force which would allow 'charging authorities' in England and Wales to apportion a levy on net additional floorspace for certain types of qualifying development to enable the funding of a wide range of infrastructure that is needed as a result of development.
- 12.2 Due to the educational nature of the developement however, development is exempt from making an CIL payment

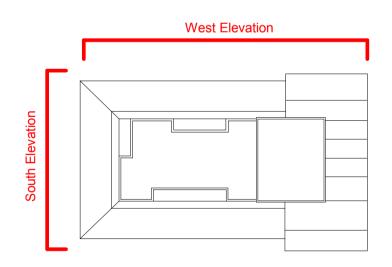
13.0 Conclusion

- 13.1 Planning decisions on applications are made by assessing how proposals accord with the development plan and material considerations
- 13.2 Currently there is insufficient provision for pupils with diagnosed and undiagnosed SEMH in the Borough. This proposal would address this issue. It would provide expert support both in terms of full-time placements, part time assessment placements as well as a comprehensive outreach programme to support inclusion in the Borough's mainstream schools of pupils with SEMH.
- 13.3 The site was selected following a review of available sites designated for education use by Enfield Council's Education Asset Management Team. It was considered the site was the only available and suitable site for the proposed development.
- 13.4 While the proposal involves the permanent loss of open space/ playing field land, it is considered this is offset by the benefits of the scheme, which include the provision of a much-needed Special Educational Needs (SEND) school, the re-use of a currently unsightly piece of land, better quality/provision of playing space, including an external hard standing court, soft/ hard play space, sports hall, and multi-purpose hall are considered to outweigh the harm of the loss of open space. A Community Use Agreement accompanies this planning application and will be adopted by the school prior to occupation to allow the use of both the school building and external areas during evenings and weekends.
- 13..5 The reasons for recommending approval of this application are:
 - The principle of the development is appropriate given their size, form and detailed design.

- The proposal would not have a detrimental impact on the character and appearance upon the school buildings or the wider area and would protect the openness of the land designated as local open space.
- o The proposed development would meet an identified need for specialist educational facilities.
- The development by virtue of its size, location and proximity would not harm the amenity of occupying and neighbouring residents.
- The proposal would not cause any unacceptable harm upon highway safety or the flow of traffic in the locality.
- The design and construction of the proposal would have appropriate regard to environmental sustainability issues including energy and water conservation, renewable energy generation, and efficient resource use.
- The proposed development would meet the Council's policy objectives in terms of climate change, low carbon energy and sustainable construction.
- The proposal would replace where required and protect trees of amenity and biodiversity value.
- 13.6 Having regard to the above assessment it is recommended that planning permission be granted subject to conditions.



8 4 9 2 Material Key: South Elevation (Planning)
1:100 1. PPC aluminium roof vents PPC aluminium roof vents
 PPC aluminium windows
 PPC aluminium louvres
 PPC aluminium capping
 Aluminium signage
 Feature brickwork with expressed headers
 Light grey render
 Dark grey / brown multi tonal brick. Product reference: Cinder Coal by Bespoke Brick Company or equal and equivalent
 Single ply roof with standing seam profile
 Light grey multi tonal brick. Product reference: All-White Bromo by Camptech or equal and equivalent



VISUAL SCALE 1:100 @ A1



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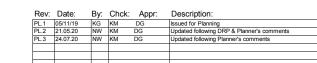
Client: Morgan Sindall

Job Title: Salmon's Brook School

Drawing Title:
Proposed Coloured GA Elevations West & South

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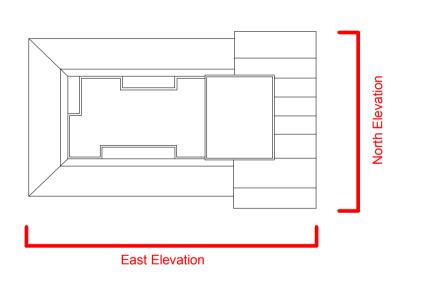






Material Key:

- PPC aluminium roof vents
 PPC aluminium windows
 PPC aluminium louvres
 PPC aluminium capping
 Aluminium signage
 Feature brickwork with expressed headers
 Light grey render
 Dark grey / brown multi tonal brick. Product reference: Cinder Coal by Bespoke Brick Company or equal and equivalent
 Single ply roof with standing seam profile
 Glazed brick in yellow/bronze/gold tones





VISUAL SCALE 1:100 @ A1



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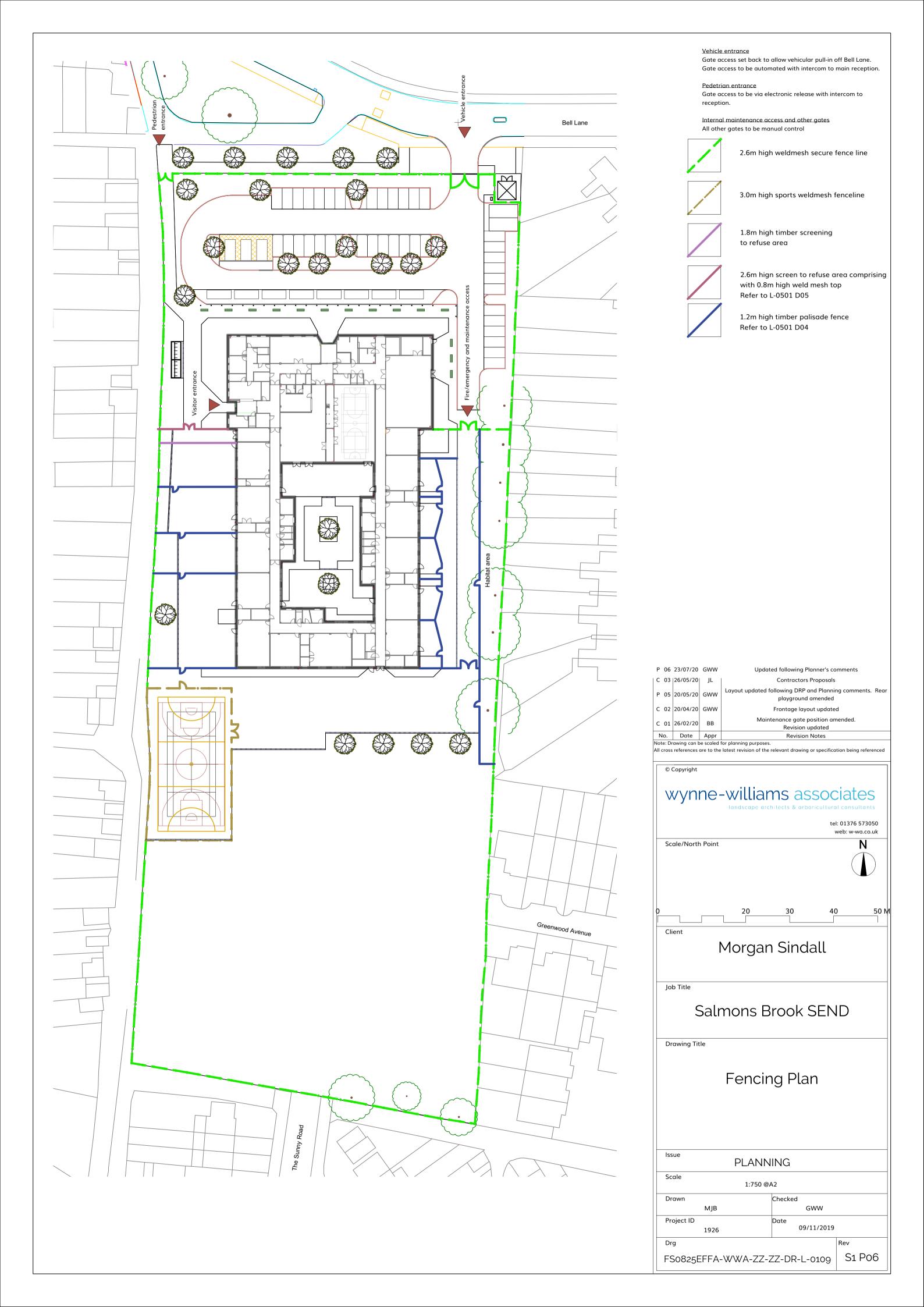
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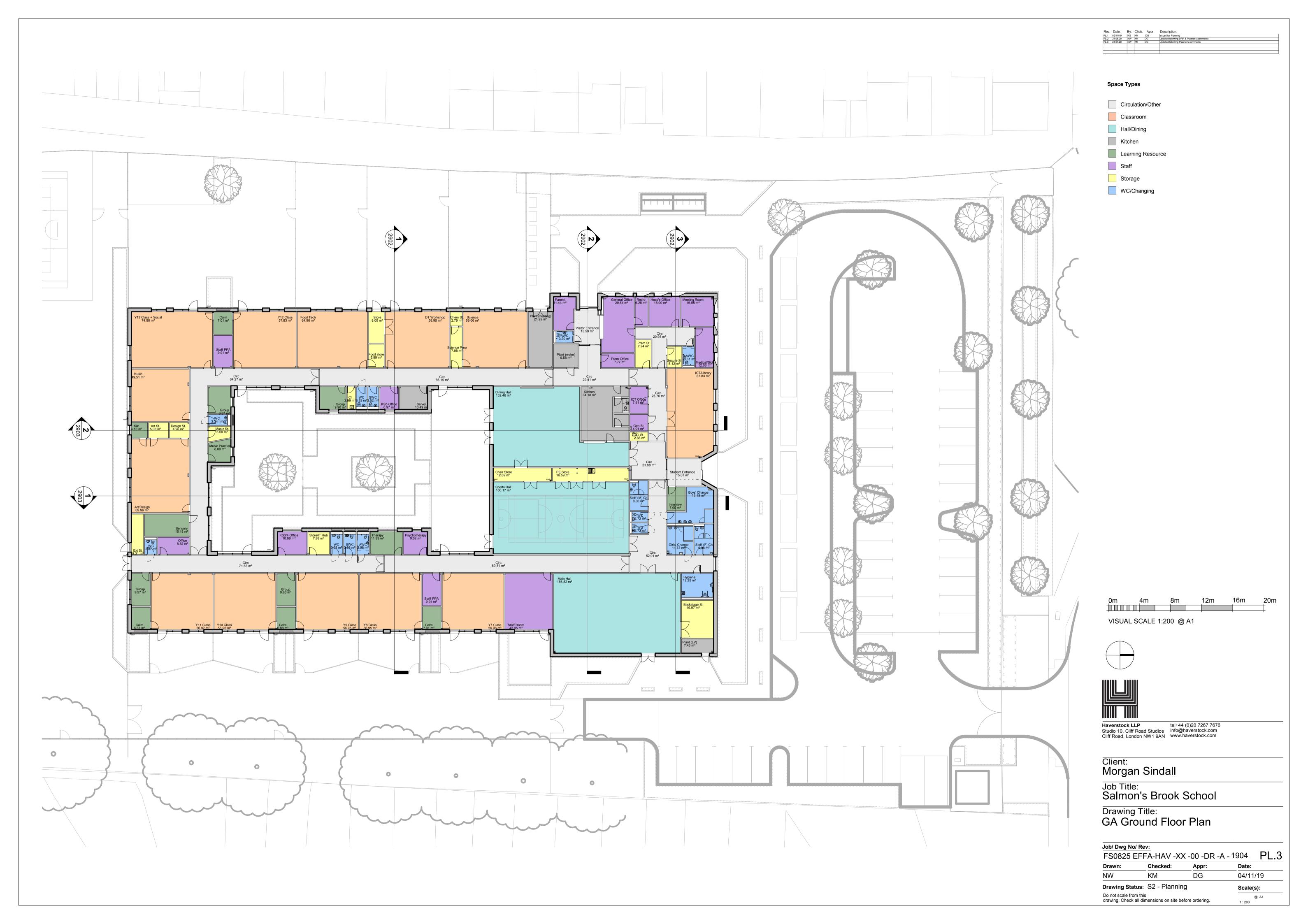
Job Title: Salmon's Brook School

Drawing Title:
Proposed Coloured GA Elevations East & North

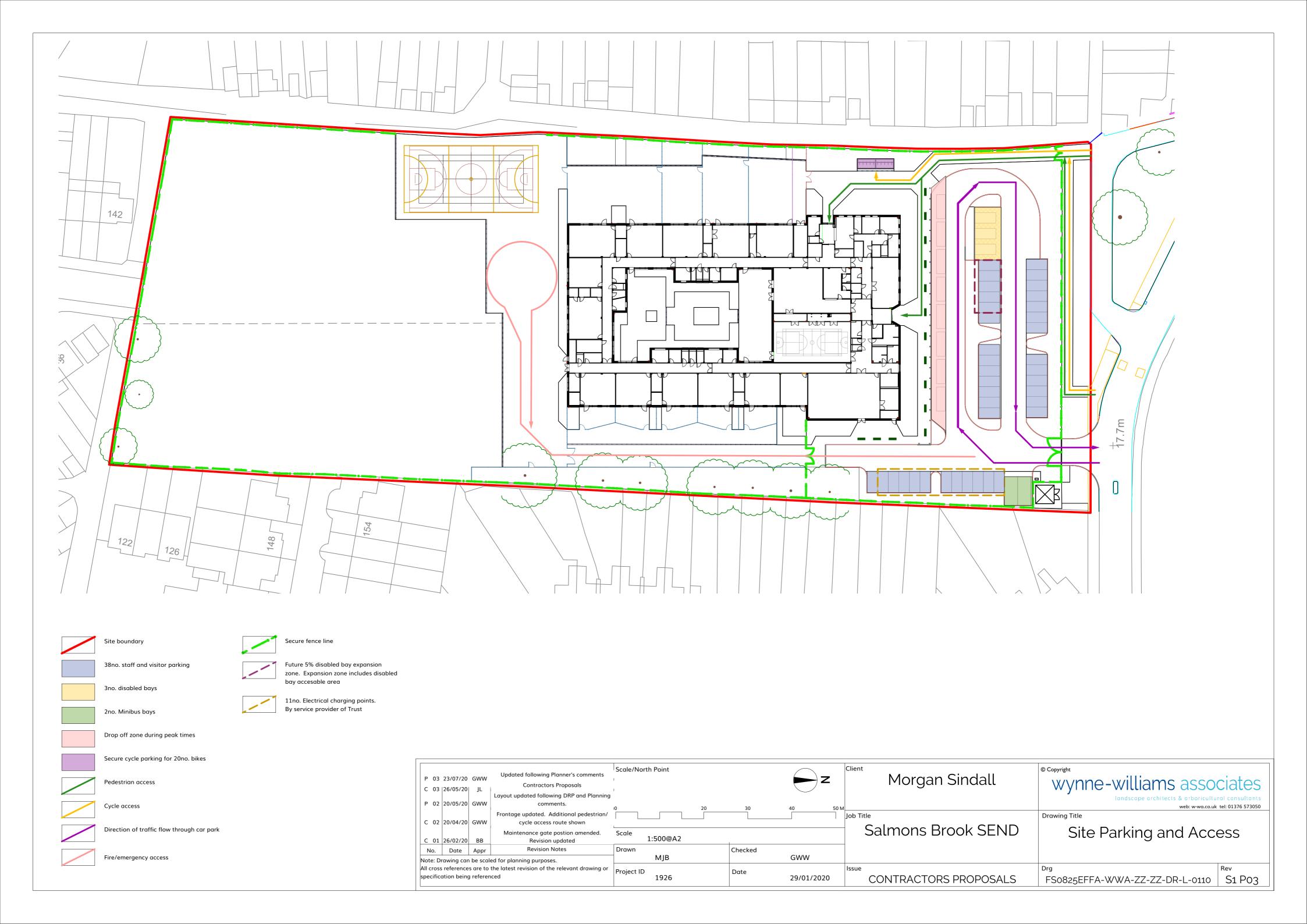
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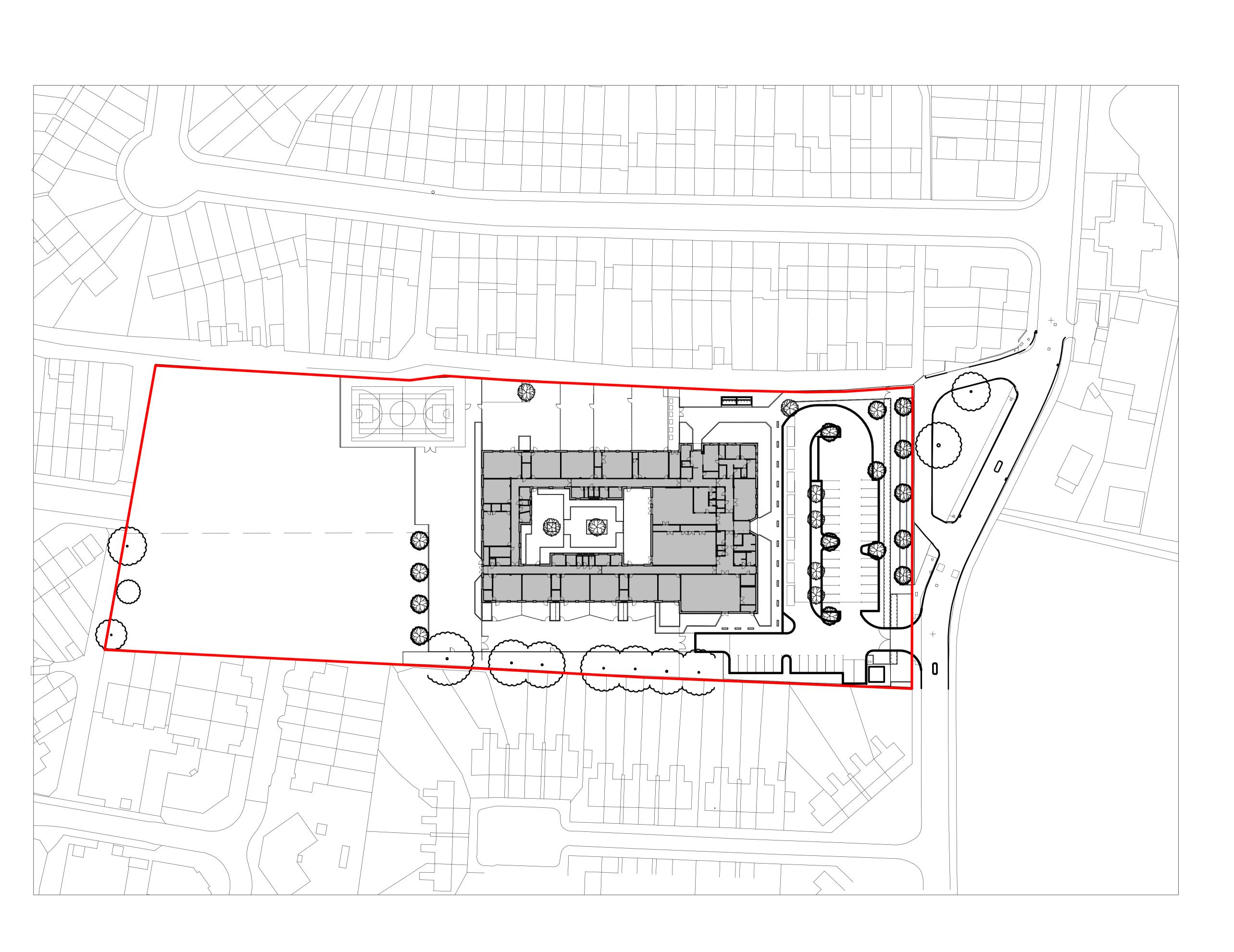
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NW	KM	DG	11/01/19	
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General Notes

Landscape proposal indicative only - please refer to WWA drawings for more detail

0m 10m 20m 30m 40m 50m

VISUAL SCALE 1:500 @ A1





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Client: Morgan Sindall

Job Title: Salmon's Brook School

Drawing Title: Proposed Site Plan - Ground Floor

Job/ Dwg No/ Rev:

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Drawing Status: S2 - Planning Scale(s): Do not scale from this drawing: Check all dimensions on site before ordering.