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Dear Andrew

ROYAL BRUNSWICK PARK - EIA COMPLIANCE STATEMENT

Greengage Environmental Ltd. (hereafter 'Greengage') is providing support to our client (Comer Homes Group) regarding proposed changes to the plans attached to the permitted Royal Brunswick Park development in the London Borough of Barnet (Barnet Council reference: 21/4433/OUT).

The purpose of this letter is to review the implications of the proposed changes upon the findings of the 2021 Environmental Statement (ES).

PLANNING CONTEXT

Existing Permission

The site benefits from an existing hybrid planning permission (HPP) which was granted in on appeal in February 2020 (Barnet Council reference 15/07932/OUT and PINS reference APP/N5090/W/17/3189843). Further details of the planning history are set out below.

An ES was prepared in support of this application in 2015 (the 2015 ES).

Following the preparation of the 2015 ES further associated reports were prepared in 2016 and 2017 to reflect changes in the number of units and the scale and massing of the proposed development.

The planning description was amended in 2017 to the following:







'Hybrid planning application for the phased comprehensive redevelopment of the North London Business Park to deliver a residential led mixed-use development. The detailed element comprises 360 residential units in five blocks reaching eight storeys, the provision of a 5 Form Entry Secondary School, a gymnasium, a multi-use sports pitch and associated changing facilities, and improvements to open space and transport infrastructure, including improvements to the access from Brunswick Park Road, and; the outline element comprises up to 990 additional residential units in buildings ranging from two to nine storeys, up to 5,177 sq m of non-residential floor space (Use Classes A1-A4, B1 and D1) and 2.54 hectares of public open space. Associated site preparation/enabling works, transport infrastructure and junction works, landscaping and car parking.'

Following the refusal of the application in September 2017 an ES Addendum was prepared in 2018 to provide further environmental information to support an appeal as a result of a request from the planning inspectorate in March 2018.

HPP (Planning ref: 15/07932/OUT) was then granted for the site on the 24th February 2020 by the Secretary of State following appeal. The HPP was granted for:

'Hybrid planning application for the phased comprehensive redevelopment of the North London Business Park to deliver a residential led mixed-use development. The detailed element comprises 376 residential units in five blocks reaching eight storeys, the provision of a 5 Form Entry Secondary School, a gymnasium, a multi-use sports pitch and associated changing facilities, and improvements to open space and transport infrastructure, including improvements to the access from Brunswick Park Road, and; The outline element comprises up to 824 additional residential units in buildings ranging from two to eleven storeys, up to 5,177 sq m of non-residential floorspace (Use Classes A1-A4, B1 and D1) and 2.9 hectares of public open space, Associated site preparation/enabling works, transport infrastructure and junction works, landscaping and car parking, as amended (IR10) to;

Hybrid planning application for the phased comprehensive redevelopment of the North London Business Park to deliver a residential led mixed-use development. The detailed element comprises 360 residential units in five blocks reaching eight storeys, the provision of a 5 Form Entry Secondary School, a gymnasium, a multi-use sports pitch and associated changing facilities, and improvements to open space and transport infrastructure, including improvements to the access from Brunswick Park Road, and; the outline element comprises up to 990 additional residential units in buildings ranging from two to nine storeys, up to 5,177 sq m of non-residential floor space (Use Classes A1-A4, B1 and D1) and 2.54 hectares of public open space. Associated site preparation/enabling works, transport infrastructure and junction works, landscaping and car parking.'

2021 Application (Ref: 21/4433/OUT)

In consideration of the existing planning permission on the site, a revised proposal was developed, taking on board the Inspector's comments from the 2020 appeal. This proposal evolved through further pre-application engagement and collaboration with officers over the course of 2021, including several meetings with local planning, design and highways officers, a Design Review



Panel, meetings with the Greater London Authority and Transport for London and various public engagement exercises.

An ES was submitted in 2021 (the 2021 ES) with the application in support of revised development for the site with the following description of development:

'Hybrid planning application for the phased comprehensive redevelopment of the North London Business Park to deliver a residential-led mixed use development. The detailed element comprises up to 466 residential units in five blocks reaching 9 storeys, the provision of a 5 form entry secondary school, a gymnasium, a multi-use sports pitch and associated changing facilities and improvements to open space and transport infrastructure, including improvements to the access from Brunswick Park Road and; the outline element comprises up to 1,967 additional residential units in buildings ranging from three to twelve storeys, up to 7,148 sqm of non-residential floor space (use Class E) and 20,250 sqm of open space. Associated site preparation/enabling work, transport infrastructure and junction work, landscaping and car parking.'

PROPOSED CHANGES TO THE SCHEME

Since the submission of the application in 2021, additional daylight/sunlight assessment work has been undertaken which has led to the following changes to the scheme:

- Reduction in single aspect units in Phase 1 including internal layout changes and full floor windows
- Glass addition to balustrades in Phase 1
- Internal design changes to meet recommendations of fire report (addition of lift to upper floors)
- These changes result in a loss of 9 units (apartments) in Phase 1.
- Block 3A has been amended to provide more community floorspace with the revised mix as follows:

• Retail: 474m²

Offices: 989m²

Community: 2,083m²

Childcare: 980m²

Residential: 21,050m²

REVIEW

Greengage have reviewed the implications of the proposed changes for the 2021 ES. It is confirmed that proposed changes will not lead to any previously unidentified likely significant effects and the ES remains sufficiently robust for application.



Further to the above it is also concluded that:

- There is no significant change to the baseline environmental conditions under which the 2021 ES was undertaken which would warrant the need for re-assessment and submission of a supplementary ES or Addendum;
- There have been no significant changes to the relevant prescribed assessment methodologies within which would warrant the need for re-assessment within a supplementary ES or Addendum; and
- The mitigation measures previously proposed are not altered by the revised plans, and are assessed as being sufficient to manage any impacts that may arise.

As such, the revised plans would not give rise to any new, additional or different likely significant impacts to those which have already been identified and reported within the ES; and we consider that it remains adequate to assess the significant effects of the development on the environment for the purposes of regulations 9(2) and 9(3) of the Regulations.

Furthermore, the findings and conclusions of the 2021 ES, in relation to the impacts associated with all of the other technical topic areas remain robust and valid, and the proposed mitigation is still appropriate and proportional.

We trust the above information provides you with the details and information you require; if you require any further clarification then please let me know.

Kind regards

James Bumphrey

Associate

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For and on behalf of Greengage Environmental Ltd