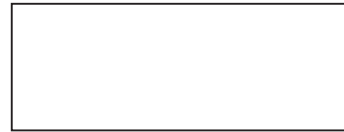


Technical Appendix 2.3: EIA Scoping Opinion



Your ref:
My ref: 20/05827/EIASCO

Please reply to: Nathan Barrett
Tel No: 07866036771
Email: northplanningteam@westminster.gov.uk

Laurence Brooker
Turley
8th Floor Lacon House
84 Theobald's Road
London WC1X 8NL

Place Shaping and Town Planning
Westminster City Council
PO Box 732
Redhill
RH1 9FL

Date: 25 March 2021

Dear Sir,

**TOWN AND COUNTRY PLANNING ACT 1990
PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990**

**Paddington Green Police Station, 4 Harrow Road, London, W2 1XJ,
Request for a scoping opinion under Regulation 15 of The Town and Country Planning
(Environmental Impact Assessment) Regulations 2017 for redevelopment of the site, including
demolition of the existing police station, excavation of basement, erection of three blocks
containing approximately 650 flats (including 260 affordable flats) and 8250 sqm of Class E
floorspace and stopping up of Newcastle Place.**

I refer to your EIA Scoping Report from Turley received on 17 September 2020. This letter constitutes the formal scoping opinion of the council.

The City Council has had the Scoping Report independently assessed by Avison Young. A copy of their review is appended for your attention and action when preparing the Environmental Statement ("ES") and planning application.

The City Council considers that the following topics / chapters should be scoped into the Environmental Statement:

- Socio-economics;
- Air quality;
- Noise and vibration;
- Wind microclimate;
- Daylight, sunlight, overshadowing and solar glare; and
- Townscape, Visual and Built Heritage.

The City Council agrees that the following non-significant environmental issues / topics can be scoped out of the Environmental Statement:

- Ecology;
- Contamination;
- Water resource and flood risk;
- Archaeology;
- Telecommunication interference;
- Light spill;
- Waste;

- Climate;
- Major accidents and disasters;
- Human health;
- Transportation and Accessibility; and
- Air Quality (in relation to likely effects associated with completed and operational traffic flow associated with the proposed development in combination with other relevant cumulative schemes).

The evidence put forward to justify scoping out Transportation and Accessibility and Air Quality are based on anticipated vehicular traffic arising from the proposed development. Acknowledging that this traffic data does not represent that of a final and fixed proposed development, the validity of the traffic data should be cross-checked and validated with final and fixed proposed development traffic flows (including for relevant Cumulative Schemes). Should this exercise continue to demonstrate no significant transportation and accessibility effects and no significant air quality effects would arise from vehicular emissions associated within the operation of the final and fixed proposed development then this should be explained / evidenced in the forthcoming ES. It would then remain appropriate to scope them out of the ES. If, however, this is not the case, then an appropriate assessment of transport and traffic (environmental effects) and associated air quality effects will be required for inclusion with the ES. The applicant will be informed of this in the decision letter.

I have appended a copy of the representations received in response to the City Council's consultation on the request for a scoping opinion. These which will need to be taken into account when compiling the Environmental Statement and planning application documents.

Yours faithfully

Deirdra Armsby
Director of Place Shaping and Town Planning

Item No.

Item No.

Delegated Report	Development Planning
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Address:	Paddington Green Police Station, 4 Harrow Road, London, W2 1XJ
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Case No.:	20/05827/EIASCO	TP:	
Date Received:	17.09.2020	Date Valid:	17.09.2020
Date amended/ completed:	17.09.2020	8 Wk Date:	15.10.2020
		EoT date:	
Agent:	Laurence Brooker / Turley	On behalf of:	
Development Plan Context:	<ul style="list-style-type: none"> - London Plan March 2021 - Westminster's City Plan November 2016 - Unitary Development Plan (UDP) January 2007 - City Plan 2019-2040 Intend to Adopt version 		

LB:		CA:	
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Proposal:

Request for a scoping opinion under Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for redevelopment of the site, including demolition of the existing police station, excavation of basement, erection of three blocks containing approximately 650 flats (including 260 affordable flats) and 8250 sqm of Class E floorspace and stopping up of Newcastle Place.

Consultations:

NATURAL ENGLAND

Advise that significant effects on statutorily designated nature conservation sites or landscapes are unlikely in this instance

ENVIRONMENT AGENCY

Following a constraint check, they have found no environmental constraints within their remit on this site and we therefore have no comments at this time.

GREATER LONDON AUTHORITY

No response received.

TRANSPORT FOR LONDON

Confirm that the applicant has entered into pre-application discussions and this consultation process is on-going. Understand that the Transport and Access chapter is proposed to be scoped out of the Environment Statement because the development will not give rise to significant adverse effects in relation to Transport. TfL are working with the applicant to agree the scope of the Transport Assessment and the development's impact on strategic transport matters. Therefore, TfL agree with the suggested approach.

THAMES WATER

Advise that the EIA Regulations 2017 set out in Schedule 4 that water and wastewater issues may need to be covered in an EIA. Thames Water considers the following issues should be considered and covered in either the EIA or planning application submission: 1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met. 2. The surface water drainage requirements and flood risk of the development both on and off site and can it be met. 3. The developments demand for water supply and network infrastructure both on and off site and can it be met. 4. Build - out/ phasing details to ensure infrastructure can be delivered ahead of occupation. 5. Any piling methodology and will it adversely affect neighbouring utility services.

HISTORIC ENGLAND

Advise that they have not comments to make on the scoping request but confirm that they will need to be consulted when the application is made

HISTORIC ENGLAND ARCHAEOLOGY

Query scoping out archaeology in the Environment Statement but then including it as a technical appendix.

ENVIRONMENTAL HEALTH OFFICER

The application site is adjacent to the WEG development. All the proposed baselines include an element of construction activities occurring within the WEG development. It is recommended that pre-construction baselines at WEG should be considered to ensure that impact magnitude against a true baseline are fully considered, rather than against an enhanced background.

In addition, current baselines for noise vibration and air quality parameters have all been impacted by current Covid 19 restrictions and lockdowns and may be reduced compared to a pre Covid 19 scenario. It is recommended that cross referencing with representative data from other projects in proximity to the site is utilised, specifically for generating the noise and vibration baselines.

When assessing the magnitude of any impacts, the applicant is encouraged to use a worst-case scenario when assessing future impacts further information regarding this point is include within this memo.

As class E is proposed, how the building will be used, the sensitivity of the occupiers and impact to nearby receptors can vary greatly. It is therefore recommended that when assessing the site suitability and any impacts to sensitive receptors within and adjacent to the development, the worst-case scenario should assessed.

On road vehicle emission for demolition and construction have been included in the assessment. Non road mobile machinery should be screened and scoped into the assessment where appropriate.

It has been stated that an air quality assessment will be produced and will consider the implications of current and future ambient air quality at the site for the proposed residential use,

Class E is proposed for part of the development that can include nurseries and other air quality sensitive uses therefore in addition to the implication of the residential elements implications to the commercial elements should also be considered. The relevant air quality objectives for assessment should follow Box 1.1 of LLAQN TG19 for example Should nurseries be proposed within Class E then the annual mean will apply.

Outdoor seating areas for commercial uses should be assessed against the 1 Hour Mean, where they are proposed.

Process contribution from the district heating energy centre within the WEG development will need to be considered for future users and occupiers of the proposed development and should include impacts to the residential roof terraces garden areas if impacted.

Impacts from traffic cannot be scoped out of the assessment unless there is a robust traffic data to demonstrate that proposed vehicle trips including any trips associated with cumulative schemes fall below the thresholds set out in the EPUK and IAQM Land-Use Planning & Development Control: Planning for Air Quality, 2017 guidance. The development has been stated to be "car free" although in the absence of any restrictions to proposed private car ownership travelling to the site and parking in nearby streets/within the neighbouring development impacts from vehicle traffic will still need be considered further.

It is proposed that this development will connect to the WEG basement and energy centre with energy provided by a combined heat and power (CHP) plant. Connecting to the existing facility is encouraged,

Item No.

although it will place additional burdens on the CHP therefore potentially resulting in increased emissions. The impacts from any increases in emissions to both existing and future receptors should be considered to reflect any changes. When modelling proposed scenario 4, as set out in the screening document, a true worst-case scenario should be used, (CHP operating continually for 365 days at maximum capacity). It is recommended that 3 years meteorological data is used when modelling point sources to avoid any seasonal variability.

The scoping opinion assumes that there are no other point sources that will impact local air quality. It is not clear, but it is assumed that there will be back up generators included in the proposed scheme. Impacts from backup generators will need to be screened and where impacts exceed criteria than they should be included in the detailed assessment.

A basement is proposed with assumed parking facilities. Where extraction to the basement is proposed this can also act as a point source for vehicle emissions. Table 6.2 of the IAQM EPUK guidance sets out the criteria for a detailed assessment of emission and should be scoped into the assessment where appropriate.

It has been stated that there is no official guidance in the UK on how to assess the significance of local air quality emissions from existing sources on a new development. The assessment of the suitability of the site will be limited to predicting air quality at on-site receptors and the significance of this will be based on whether the national air quality objectives for each pollutant, as set out in the Air Quality Strategy for England, Scotland, Wales and Northern Ireland, are exceeded or not. London councils has produced guidance relating to site suitability where it applies a "5% buffer" to the national air quality objectives and it is recommended that this is used.

An air quality neutral assessment has been scoped into the EIA but it is recommended that the calculation should include combustion plant associated to the WEG development and include any other point sources for example backup generators (testing and maintenance cycles only). The assessment should be based on data from the approved transport assessment for vehicle emissions and for building emissions accurate energy demand for the CHP or where this is not available assumed 365 day for 24 hours a day usage.

Air quality positive is included within the revised London Plan. Should further information become available before submission of the EIA then air quality positive should be included.

The following noise and vibration impacts have been scoped into the EIA

- o Demolition and construction noise and vibration at noise sensitive receptors (NSRs) in close proximity to the proposed development, as well as early occupied units on-site;
- o Demolition and construction HGV traffic noise and the associated potential noise level changes on the local road network at NSRs, as well as early occupied units on-site;
- o Public transport operational noise - although not a direct effect on the existing noise sensitivities as a result of the development, the operations of TfL (both bus and rail) and surrounding London airports will be taken into consideration to ensure a suitable acoustic environment prevails for any future residential occupants of the developed site;
- o Vibration from public transport, in particular from the London Underground tunnels below the site, and an assessment on the likely effects of vibration and associated re-radiated noise on the proposed development;
- o Noise effects on future residents of the proposed development from the operation of non residential components of the proposed development (e.g. commercial). As Use Class E is proposed it is recommended that a worst-case assessment is provided for potential impacts.
- o Building services plant noise effects associated with the operation of the proposed development upon existing and future residents and amenity areas introduced by the proposed development.

The proposed scenarios can be agreed but in addition, BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites - Part 1: Noise, Section E.3.2 sets out a methods to assess significant impacts from construction impacts and section E4 sets out the example thresholds used to determine the eligibility for insulation and temporary rehousing, and these should form

Item No.

part of the assessment process.

Site suitability has been scoped into the EIA which can be agreed. In addition to habitable spaces any outdoor areas, proposed balconies and communal outdoor spaces should be assessed against WHO standards 1999. Where external areas do not meet WHO standards mitigation options should be explored to reduce noise impacts as far as it is practicable.

Impacts for traffic uplift as a result of cumulative impacts from consented and the proposed scheme should be included where it has been reported that the assessment would be undertaken for road links subjected to at least a 20 % change in traffic flow.

The monitoring strategy proposed is broadly agreeable although this will require some thought. The base line surveys will be temporally influenced by the active construction site and it undertaken during times of national/local lockdown or restrictions could result in accurate data to make judgments against site suitability and setting design criteria for any plant and equipment and internal/external activities. It is recommended that library data, local assessments pre-construction and any other representative data are used to supplement the survey to make a judgment of its accuracy.

Where mitigation is proposed to meet internal noise standards in the form of closed windows and mechanical ventilation, overheating assessments should be scoped into the assessment to demonstrate that the development complies with the latest version of the CIBSE TM59 guidance.

Section 7.3 states "A Contamination technical assessment chapter is proposed to be scoped out of the ES because the proposed development would not give rise to significant environmental effects in relation to Contamination."

Impacts to future occupiers will require assessment due to the historic use of the site which include various factories prior to use as a police station as demonstrated in the following historic map.

Communal open spaces, residential development and sensitive uses are propped under Class E. Contamination should be scoped into the impact assessment.

BUILDING CONTROL
No response received.

WASTE PROJECT OFFICER
The applicant has confirmed that the development will summarise the operational waste management measures which would be included within the proposed development (and outlined within the Waste Strategy). For example, the new on-site floorspace would be provided with appropriate waste facilities to promote sustainable waste practices and recycling. Sufficient information relevant to waste management practices during all stages of the proposed development will be provided to fulfil requirements in line with the key UK waste related legislation and overarching EU Directives.

Notwithstanding, the proposed development is a major development that will generate large amount of waste and recycling. The applicant will need to be aware of the following requirements:

- No chute should be proposed as part of the strategy to collect waste and recyclables as the of chutes has not demonstrated or result in capturing quality recyclable materials for further processing and use.
- The proposal is a major development that will require siting of a public Micro Recycling Centre that will be funded by the applicant.

HIGHWAYS PLANNING MANAGER
No response received.

LEAD LOCAL FLOOD AUTHORITY
No response received.

Item No.

PLACESHAPING TEAM
No response received.

Relevant Planning History:

None.

Considerations:

APPLICATION SITE

The application site occupies the triangle of land bound by Edgware Road (to the east), Harrow Road/the Westway (to the south) and Newcastle Place (to the north). It is occupied by a disused police station and section house (Use Class Sui Generis). This use is contained within a complex comprised of a 17-storey element at its eastern end and an 8-storey element at its western end connected by a three-storey podium. The 17-storey element contained the section house, whilst the podium and 8 storey element contained the police stations front desk, offices and custody suite. A carpark and loading facilities are located on the northern side of the podium. Further parking and plant facilities are located within a basement level beneath the site.

The application site is located to the south and opposite the applicants West End Gate (WEG) development. That development includes 829 new homes within a 30 storey tower and seven mansion blocks between five and 19 storeys. Two levels of basement parking and servicing are located beneath the entire WEG site.

Under the operative development plan, the application site is located within the Central Activities Zone (CAZ), is on a Named Street (Edgware Road) and is located within the North Westminster Economic Development Area (NWEDA). It is not located within a conservation area and does not contain a listed building. The site is located opposite and immediately to the south of the Church Street/Edgware Road District Shopping Centre.

The City Council has recently received the Inspectors report following the EiP for the City Plan 2019-2040 (Intend to Adopt Version) ("the City Plan 2019-2040"). The Inspectors report has found the City Plan 2019-2040 sound and it is highly likely that it will be adopted at a full Council meeting next month. Accordingly, its policies now carry significant weight.

Under the City Plan 2019-2040, the application site is no longer in the CAZ, on a Named Street or in NWEDA. It is located within the Church Street/Edgware Road Housing Renewal Area and located opposite, although outside the Paddington Opportunity Area. It remains outside and immediately to the south of the Church Street/Edgware Road District Shopping Centre.

PROPOSED DEVELOPMENT

The applicant has requested an EIA scoping opinion with respect to the following:

- demolition of the Paddington Green Police Station;
- excavation of a basement connection to the West End Gate development basement;
- erection of three buildings of 39, 25 and 14 storeys with associated landscaping and public realm works around the site; and
- stopping up of Newcastle Place with associated landscaping and cycle parking.

The proposed land uses are likely to comprise:

- approximately 650 homes, including 260 affordable housing units (Class C3);

Item No.

- approximately 8,250 sqm gross external area (GEA) flexible commercial space (Class E);s
- servicing and disabled parking at basement level; and
- connection to the West End Gate (WEG) basement and energy centre with combined heat and power (CHP) plant.

No drawings of the proposed development have been submitted.

LEGISLATIVE CONTEXT

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (hereafter referred to as 'the 2017 EIA Regulations') require that for certain planning applications, an Environmental Impact Assessment (EIA) is undertaken, and an Environmental Statement (ES) produced.

Schedule 1 of the 2017 EIA Regulations lists developments that always require EIA, and Schedule 2 lists developments that may require EIA if it is considered that they could give rise to significant environmental effects by virtue of factors such as its nature, size or location.

Where a proposed development is determined to be an 'EIA development' the Applicant can ask the relevant planning authority for advice on the scope of the EIA (an EIA Scoping Opinion).

A request for an EIA Scoping Opinion was received by the City Council as the 'relevant planning authority' from Turley on behalf of the applicant on 17 September 2020.

The purpose of the Scoping Application is to outline the scope of the ES to support the planning application for the development proposed.

The issuing of this EIA Scoping Opinion does not prevent the planning authority from requesting 'further information' at a later stage under Regulation 25 of the 2017 EIA Regulations.

The 2017 EIA Regulations require that the local planning authority consults 'consultation bodies' prior to issuing an EIA Scoping Opinion. WCC has therefore consulted both internal and external consultees on the request for an EIA Scoping Opinion..

ASSESSMENT

This section of the report considers the proposed scope of the forthcoming ES as well as providing a commentary on the content of the ES having regard to the comment received in response to consultation on the submitted scoping report. The Scoping Report has also been independently assessed by EIA specialists at Avison Young. A copy of Avison Young's review will be appended to the decision letter.

The applicant proposes scoping in the following topics:

- Socio-economics;
- Air quality;
- Noise and vibration;
- Wind microclimate;
- Daylight, sunlight, overshadowing and solar glare; and
- Townscape, Visual and Built Heritage.

The applicant proposes scoping out the following topics:

- Ecology;
- Contamination;
- Water resource and flood risk;
- Archaeology;
- Telecommunication interference;
- Light spill;
- Waste;
- Climate;

Item No.

DRAFT DECISION LETTER

- Major accidents and disasters;
- Human health;
- Transportation and Accessibility; and
- Air Quality (in relation to likely effects associated with completed and operational traffic flow associated with the proposed development in combination with other relevant cumulative schemes).

Avison Young have raised no objection to the proposed topics to be scoped in and out at the present time. However, the evidence put forward to justify scoping out Transportation and Accessibility and Air Quality are based on anticipated vehicular traffic arising from the proposed development. Acknowledging that this traffic data does not represent that of a final and fixed proposed development, Avison Young advise that the validity of the traffic data should be cross-checked and validated with final and fixed proposed development traffic flows (including for relevant Cumulative Schemes). Should this exercise continue to demonstrate no significant transportation and accessibility effects and no significant air quality effects would arise from vehicular emissions associated within the operation of the final and fixed proposed development then this should be explained / evidenced in the forthcoming ES. It would then remain appropriate to scope them out of the ES. If, however, this is not the case, then an appropriate assessment of transport and traffic (environmental effects) and associated air quality effects will be required for inclusion with the ES. The applicant will be informed of this in the decision letter.

The Environmental Health Officer has made a number of comments on the scoping request and these have been reviewed by Avison Young. Generally, the issues raised are of a technical nature and do not change the topics to be scoped in or out. However, the EHO has requested the scoping in of overheating for the proposed units and site contamination. Avison Young have reviewed the EHO's comments and note that neither overheating or site contamination are likely to result in significant environmental effects given the applicants assessment and the history of this site. Accordingly, overheating and site contamination have not been scoped in

CONCLUSION

The City Council agrees the topics that the applicant proposes to include in the ES. In addition to the principal matter of the scope of the ES, the independent guidance from Avison Young is to be provided to the applicant, along with full copies of all correspondence received in response to consultation on the scoping opinion to the assist the continued preparation of the ES.

Recommendation:

Adopt scoping opinion that:

- Socio-economics; Air quality; Noise and vibration; Wind microclimate; Daylight, sunlight, overshadowing and solar glare; and Townscape, Visual and Built Heritage should all be scoped in; and
- Ecology; Contamination; Water resource and flood risk; Archaeology; Telecommunication interference; Light spill; Waste; Climate; Major accidents and disasters; Human health; Transportation and Accessibility; and Air Quality (in relation to likely effects associated with completed and operational traffic flow associated with the proposed development in combination with other relevant cumulative schemes) may be scoped out.

Case Officer or Morning Meeting Officer: Nathan Barrett	Date: 24 March 2021
Reason (if over 8/13 wk deadline):	

Address: Paddington Green Police Station, 4 Harrow Road, London, W2 1XJ

Proposal: Request for a scoping opinion under Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for redevelopment of the site, including demolition of the existing police station, excavation of basement, erection of three blocks containing approximately 650 flats (including 260 affordable flats) and 8250 sqm of Class E floorspace and stopping up of Newcastle Place.

Plan Nos: EIA Scoping Opinion Request Report by Ramboll, dated September 2020

Case Officer: Nathan Barrett **Direct Tel. No.** 07866036771

Recommended Condition(s) and Reason(s) or Reason(s) for Refusal:

Reason:
See decision letter.

Item No.

Date: 02 October 2020
Our ref: 328677
Your ref: 20/05827/EIASCO



Mr Nathan Barrett
Development Planning
City of Westminster
PO Box 732
Redhill RH1 9FL

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

northplanningteam@westminster.gov.uk

T 0300 060 3900

Dear Mr Barrett

Environmental Impact Assessment Screening consultation: Request for a scoping opinion under Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for redevelopment of the site, including demolition of existing police station, excavation of basement, erection of three blocks containing approximately 650 flats (including 260 affordable flats) and 8250 sqm of Class E floorspace and stopping up of Newcastle Place.

Location: Paddington Green Police Station, 4 Harrow Road, London, W2 1XJ,

Thank you for your consultation on the above dated 23 September 2020 which was received by Natural England on 23 September 2020.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

It is Natural England's advice, on the basis of the material supplied with the consultation, that significant effects on statutorily designated nature conservation sites or landscapes are unlikely.

Schedule 3(2) of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 requires consideration of the selection criteria for Schedule 2 EIA development and identification of 'environmental sensitivity'.

The proposed development is not located within or partly within any Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SPA) or Ramsar Site and is not likely to significantly effect the notified interest features of such sites. The proposal is not located within or partly within a National Park, Area of Outstanding Natural Beauty or Heritage Coast and is unlikely to impact upon the purposes for which these areas are designated or defined.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this proposal is likely to affect protected species to such an extent as to require an Environmental Impact Assessment (EIA).

The developer must provide sufficient information for your authority to assess whether protected species are likely to be affected and, if so, whether appropriate avoidance, mitigation, or compensation measures can be put in place. Further information is included in Natural England's [standing advice](#) on protected species.

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. This development proposal may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant an EIA. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the proposed development before determining whether an EIA is necessary.

Should you determine that an EIA is not required in this case, you should still ensure that the application is supported by sufficient biodiversity, landscape and other environmental information in order for you to assess the weight to give these material considerations when determining the planning application.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that this response relates only to the EIA screening consultation. Natural England may wish to provide advice should your authority consult us on any subsequent planning application. Guidance on when to consult Natural England is [here](#).

Please send any new consultations, or any further information on this consultation to: consultations@naturalengland.org.uk

Yours sincerely

Sally Ireland
Consultations Team

From: Flower Chloe
Sent: 18 Mar 2021 05:08:59
To: nbarrett@westminster.gov.uk,
Subject: RE: Paddington Green Police Station - Scoping Request (our ref: 20/05827/EIASCO)
Attachments: image002.png,

Hi Nathan,

Thank you for consulting TfL on this application, apologies for the delay in getting back to you.

The developer has entered into pre-application discussions with TfL and this consultation process is on-going. I've reviewed the EIA Scoping Note and it is understood that the Transport and Access chapter is proposed to be scoped out of the ES because the development will not give rise to significant adverse effects in relation to Transport. TfL are working with the applicant team to agree the scope of the Transport Assessment and the development's impact on strategic transport matters. Therefore we are in agreement with the suggested approach.

Kind regards

Chloe Flower

Area Planner (West) | Spatial Planning

Transport for London 9B4, 5 Endeavour Square, Westfield Avenue, London | E20 1JN

Phone: (020) 7126 4155 | Auto: 64155 | M: 07702 015049 | Email: ChloeFlower@tfl.gov.uk

From: Barrett, Nathan: WCC <nbarrett@westminster.gov.uk>

Sent: 12 March 2021 10:20

To: Flower Chloe <ChloeFlower@tfl.gov.uk>

Subject: Paddington Green Police Station - Scoping Request (our ref: 20/05827/EIASCO)

Importance: High

Hi Chloe,

Hope you are well.

I have just sent a consult on the above scoping request to TFL and understand you have been dealing with this site. We have had this request with us for some time whilst our EIA consultant was reviewing it. Unfortunately, TFL were not initially consulted on it. I appreciate you have just received this, but anything you can do to expedite your response on this would be greatly appreciated.

Kind Regards

Nathan Barrett

Area Planning Officer - North Team

Place Shaping and Town Planning - Growth, Planning and Housing

Westminster City Council

PO Box 732

Redhill

RH1 9FL

Tel: 078 6603 6771 (Please note new number)

westminster.gov.uk



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Any views or opinions expressed in this email are those of the sender, and whilst given in good faith, do not necessarily represent a formal decision of the Local Planning Authority unless a statutory application is or has been made and determined in accordance with requisite procedures, planning policies and having had regard to material considerations.

Due to constraints on officer time and the large volume of correspondence received, emails will only be responded to where I deem necessary.

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If you are concerned about an adult who you think requires social care and support or you have a safeguarding concern, phone 020 7641 1444 or 020 7641 1175 or email: adultsocialcare@westminster.gov.uk

If you are concerned about a child and you have a safeguarding concern, phone: 0207 641 4000 or email AccesstoChildrensServices@westminster.gov.uk

Westminster City Council switchboard: +44 20 7641 6000.

www.westminster.gov.uk

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Subject: 3rd Party Planning Application - 20/05827/EIASCO

City of Westminster
Department of Planning & City Development
Westminster City Hall
64 Victoria Street
London
SW1E 6QP

Our DTS Ref: 60044
Your Ref: 20/05827/EIASCO

23 September 2020

Dear Sir/Madam

Re: PADDINGTON GREEN POLICE STATION-4, HARROW ROAD, LONDON, W2 1XJ

Waste Comments

.

Water Comments

Thank you for giving Thames Water the opportunity to comment on the above application. Thames Water are the statutory water and sewerage undertaker for the area and would like to make the following comments: The EIA Regulations 2017 set out in Schedule 4 that water and wastewater issues may need to be covered in an EIA. Thames Water considers the following issues should be considered and covered in either the EIA or planning application submission: 1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met. 2. The surface water drainage requirements and flood risk of the development both on and off site and can it be met. 3. The developments demand for water supply and network infrastructure both on and off site and can it be met. 4. Build – out/ phasing details to ensure infrastructure can be delivered ahead of occupation. 5. Any piling methodology and will it adversely affect neighbouring utility services. The developer can obtain information to support the EIA by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ
[Tel:020 3577 9998](tel:02035779998)
Email: devcon.team@thameswater.co.uk

Mr Nathan Barrett
City of Westminster
Development Planning
64 Victoria Street
London
SW1E 6QP

Direct Dial: 020 7973 3712

Our ref: PL00717002

3 October 2020

Dear Mr Barrett

Thank you for contacting us on 23 September 2020 seeking our observations on an Environmental Impact Assessment Scoping Opinion Request made under Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 to your authority relating to the above site.

We have reviewed the Scoping Opinion submission available on your website. Whilst we do not have any observations to make in relation to the Scoping Opinion submission, we can confirm that Historic England would be a statutory consultee on any resulting planning application. We may provide comments once we have been consulted on the full application.

If you have questions regarding any of the above, please do contact me.

Yours sincerely,

Steve Hurst
Business Officer
steve.hurst@HistoricEngland.org.uk



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

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HistoricEngland.org.uk



CITY OF WESTMINSTER MEMORANDUM

1

TO	NATHAN BARETT, Development Planning Services 12 th Floor, City Hall
REFERENCE	20/05827/EIASCO
FROM	Public Protection and Licensing Environmental Sciences 4 th Floor, City Hall
REFERENCE BEING DEALT WITH BY TELEPHONE E-MAIL DATE	20/36797/EEMAJ Gavin McIntosh 0207 641 07890 380 520 gmcintosh1@westminster.gov.uk 1 February 2021

RE: Paddington Green Police Station, 4 Harrow Road, London, W2 1XJ

Request for a scoping opinion under Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for redevelopment of the site, including demolition of existing police station, excavation of basement, erection of three blocks containing approximately 650 flats (including 260 affordable flats) and 8250 sqm of Class E floorspace and stopping up of Newcastle Place.

I have reviewed the scoping request Intended for Berkeley Homes (Central London) Limited Date September 2020 Project Number 1620009008 make the following comments.

Section 3.2.1 Existing and Future Baselines

It has been stated that,

The existing baseline for the EIA will be taken as the existing site and its immediate surrounds, with the exception of transport and accessibility; air quality; and noise and vibration where the following future baselines will be considered:

- the year of the most intensive demolition and construction works, in terms of the number of vehicle movements; and*
- the year of the proposed development's completion*

Adjacent to the proposed development is the permitted Westend Gate (WEG) scheme, that is currently under construction. Construction and demolition activities influence will enhance the noise, vibration and air quality baselines therefore potentially impacting the assessment for this project.

All the proposed baselines include an element of construction activities occurring within the WEG development. When assessing impacts, it is recommended that preconstruction baselines of the WEG should be considered to ensure that impact magnitude against a true baseline are fully considered, rather than against an enhanced background.

In addition, current baselines for noise vibration and air quality parameters have all been impacted by current Covid 19 restrictions and lockdowns, therefore may be reduced compared to a pre Covid 19 scenario. It is recommended that cross referencing with representative data from other projects in proximity to the site is utilised, specifically for generating the noise and vibration baselines. 2

When assessing the magnitude of any impacts the applicant is encouraged to use a worst-case scenario when assessing future impacts further information regarding this point is include within this memo.

Section 5 Proposed Development

It has been stated that approximately 8,250 m² gross external area (GEA) flexible commercial space (Class E) is proposed. Class E can include retail, restaurant, office, financial/professional services, indoor sports, medical and nursery **uses** along with “any other services which it is appropriate to provide in a commercial, business or service locality”.

As class E is proposed, how the building will be used, the sensitivity of the occupiers and impact to nearby receptors can vary greatly. It is therefore recommended that when assessing the site suitability and any impacts to sensitive receptors within and adjacent to the development, the worst-case scenario should assessed.

For example:

With respect to air quality, if a nursery/medical facility is proposed the annual mean objective is applicable where if a less sensitive use is proposed the 1-hour mean objective is applicable.

With respect to noise and vibration, if a restaurant or sports facility is proposed, compared to an office, internal noise levels generated will vary therefore so will any impacts.

It is recommended that the EIA always ensure that a worst-case scenario is used to predict impacts and judge the site suitability.

Section 6.2 Air Quality

Demolition and construction

On road Vehicle emission for demolition and construction have been included in the assessment. Non road mobile machinery should be screened and scoped into the assessment where appropriate.

Impact to future receptors (site suitability)

It has been stated that an air quality assessment will be produced and will consider the implications of current and future ambient air quality at the site for the proposed residential use,

Class E is proposed for part of the development that can include nurseries and other air quality sensitive uses therefore in addition to the implication of the residential elements

implications to the commercial elements should also be considered. The relevant air quality objectives for assessment should follow Box 1.1 of LLAQN TG19 for example Should nurseries be proposed within Class E then the annual mean will apply. 3

Outdoor seating areas for commercial uses should be assessed against the 1 Hour Mean, where they are proposed.

Process contribution from the district heating energy centre within the WEG development will need to be considered for future users and occupiers of the proposed development and should include impacts to the residential roof terraces garden areas if impacted.

Impacts to existing receptors operation impacts

The report states that “*the proposed development will be car-free, with the exception of minimal disabled parking provision and subject to scoping with WCC. Together with servicing trips, the total vehicle trip generation for the site would be minimal and therefore the effects of the proposed development traffic emissions would be not significant and have been scoped out of the assessment.*”

Impacts from traffic cannot be scoped out of the assessment unless there is a robust traffic data to demonstrate that proposed vehicle trips including any trips associated with culminative schemes fall below the thresholds set out in the EPUK and IAQM Land-Use Planning & Development Control: Planning for Air Quality, 2017 guidance. The development has been stated to be “car free” although in the absence of any restrictions to proposed private car ownership traveling to the site and parking in nearby streets/within the neighbouring development impacts from vehicle traffic will still need be considered further.

It is proposed that this development will connect to the WEG basement and energy centre with energy provided by a combined heat and power (CHP) plant. Connecting to the existing facility is encouraged, although it will place additional burdens on the CHP therefore potentially resulting in increased emissions. The impacts from any increases in emissions to both existing and future receptors should be considered to reflect any changes. When modelling proposed scenario 4, as set out in the screening document, a true worst-case scenario should be used, (CHP operating continually for 365 days at maximum capacity). It is recommended that 3 years metrological data is used when modelling point sources to avoid any seasonal variability.

The scoping opinion assumes that there are no other point sources that will impact local air quality. It is not clear, but it is assumed that there will be back up generators included in the proposed scheme. Impacts from backup generators will need to be screened and where impacts exceed criteria than they should be included in the detailed assessment.

A basement is proposed with assumed parking facilities. Where extraction to the basement is proposed this can also act as a point source for vehicle emissions. Table 6.2 of the IAQM EPUK guidance sets out the criteria for a detailed assessment of emission and should be scoped into the assessment where appropriate.

It has been stated that there is no official guidance in the UK on how to assess the significance of local air quality emissions from existing sources on a new development. The assessment of the suitability of the site will be limited to predicting air quality at on-

site receptors and the significance of this will be based on whether the national air quality objectives for each pollutant, as set out in the Air Quality Strategy for England, Scotland, Wales and Northern Ireland, are exceeded or not. London councils has produced guidance relating to site suitability where it applies a “5% buffer” to the national air quality objectives and it is recommended that this is used. 4

Air Quality Neutral Assessment

An air quality neutral assessment has been scoped into the EIA but it is recommended that the calculation should include combustion plant associated to the WEG development and include any other point sources for example backup generators (testing and maintenance cycles only). The assessment should be based on data from the approved transport assessment for vehicle emissions and for building emissions accurate energy demand for the CHP or where this is not available assumed 365 day for 24 hours a day usage.

Air quality positive is included within the revised London Plan that is due to be published imminently. Should further information become available before submission of the EIA then air quality positive should be included.

Noise and Vibration

the following impacts have been scoped into the EIA

- Demolition and construction noise and vibration at noise sensitive receptors (NSRs) in close proximity to the proposed development, as well as early occupied units on-site;
- Demolition and construction HGV traffic noise and the associated potential noise level changes on the local road network at NSRs, as well as early occupied units on-site;
- Public transport operational noise – although not a direct effect on the existing noise sensitivities as a result of the development, the operations of TfL (both bus and rail) and surrounding London airports will be taken into consideration to ensure a suitable acoustic environment prevails for any future residential occupants of the developed site;
- Vibration from public transport, in particular from the London Underground tunnels below the site, and an assessment on the likely effects of vibration and associated re-radiated noise on the proposed development;
- Noise effects on future residents of the proposed development from the operation of nonresidential components of the proposed development (e.g. commercial). As Use Class E is proposed it is recommended that a worst-case assessment is provided for potential impacts.
- Building services plant noise effects associated with the operation of the proposed development upon existing and future residents and amenity areas introduced by the proposed development.

The proposed scenarios can be agreed but in addition, BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1:

Noise, Section E.3.2 sets out a methods to assess significant impacts from construction impacts and section E4 sets out the example thresholds used to determine the eligibility for insulation and temporary rehousing, and these should form part of the assessment process. 5

Section 6.3

Site suitability has been scoped into the EIA which can be agreed. In addition to habitable spaces any outdoor areas, proposed balconies and communal outdoor spaces should be assessed against WHO standards 1999. Where external areas do not meet WHO standards mitigation options should be explored to reduce noise impacts as far as it is practicable.

Impacts for traffic uplift as a result of culminative impacts from consented and the proposed scheme should be included where it has been reported that the assessment would be undertaken for road links subjected to at least a 20 % change in traffic flow.

Baseline Characterisation

A monitoring strategy that is proposed that is broadly agreeable although this will require some thought. The base line surveys will be temporally influenced by the active construction site and it undertaken during times of national/local lockdown or restrictions could result in in accurate data to make judgments against site suitability and setting design criteria for any plant and equipment and internal/external activities. It is recommended that library data, local assessments preconstruction and any other representative data are used to supplement the survey to make a judgment of its accuracy.

Impacts

As previously advised due to the presence of Use Class E there is a wide range of potential use options all with varying impacts. When assessing impacts to proposed and existing receptors a “worst case” noise generating use type should be considered.

Mitigation Overheating

Where mitigation is proposed to meet internal noise standards in the form of closed windows and mechanical ventilation, overheating assessments should be scoped into the assessment to demonstrate that the development complies with the latest version of the CIBSE TM59 guidance.

Contamination

Section 7.3 states “A Contamination technical assessment chapter is proposed to be scoped out of the ES because the proposed development would not give rise to significant environmental effects in relation to Contamination.”

Impacts to future occupiers will require assessment due to the historic use of the site which include various factories prior to use as a police station as demonstrated in the



City of Westminster

INTERNAL MEMORANDUM

To: Nathan Barrett, Development Planning
 From: Saeed Oluwadipe, Projects Officer (Waste), Highways Planning
 Tel: 7962
 Date: 23 January 2020
 Ref: 20/05827/EIASCO
 Subject: Paddington Green Police Station, 4 Harrow Road, London, W2 1XJ

This application is for Environmental Impact Assessment – Scoping Report for for redevelopment of the site, including demolition of existing police station, excavation of basement, erection of three blocks containing approximately 650 flats (including 260 affordable flats) and 8250 sqm of Class E floorspace and stopping up of Newcastle Place.

The scoping report identifies the potential significant environmental effects likely to occur due to the proposed development and the potential non-significant environmental impact and effects.

In view of the above, applicant has affirmed that the Proposed Development Description will summarise the operational waste management measures which would be included within the proposed development (and outlined within the Waste Strategy). For example, the new on-site floorspace would be provided with appropriate waste facilities to promote sustainable waste practices and recycling. Sufficient information relevant to the waste management practices during all stages of the proposed development will be provided to fulfil requirements in line with the key UK waste related legislation and overarching EU Directives.

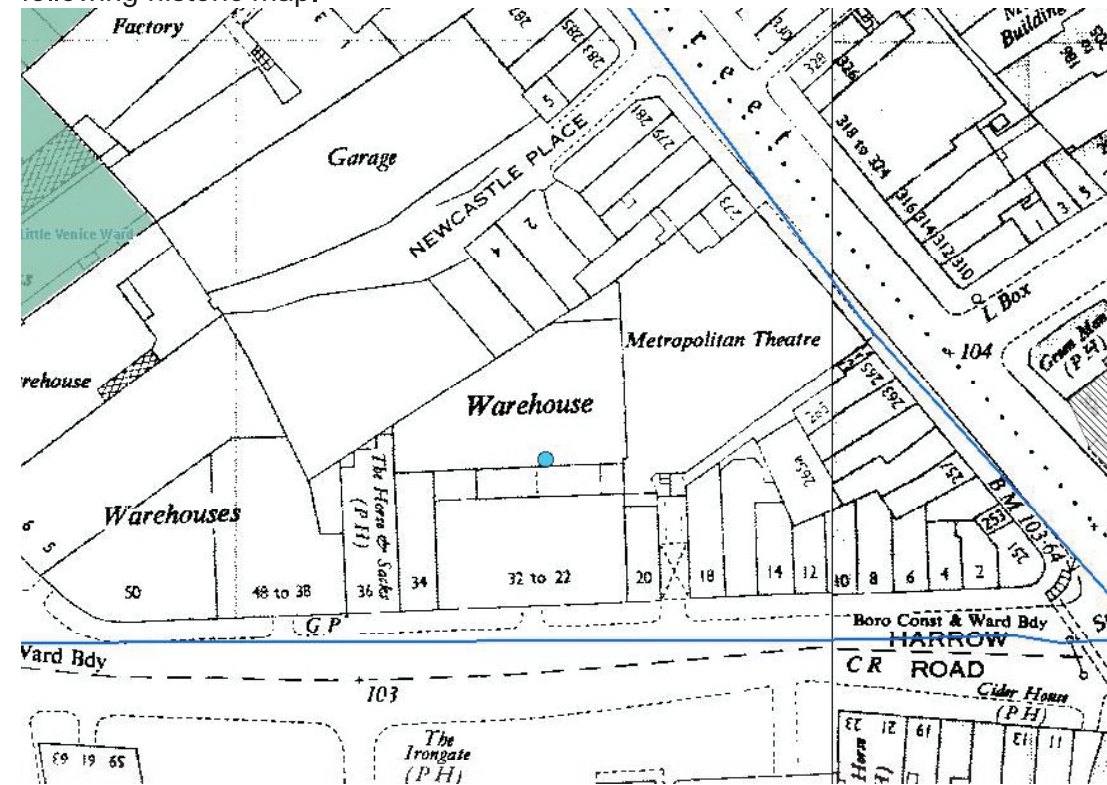
Notwithstanding, the proposed development is a major development that will generate large amount of waste and recycling. Applicant need to take into consideration two important issues when designing the waste strategy for operational phase.

- No chute should be proposed as part of the strategy to collect waste and recyclables as the of chutes has not demonstrated or result in capturing quality recyclable materials for further processing and use.
- The proposal is a major development that will require siting of a public Micro Recycling Centre that will be funded by the applicant.

Therefore, the applicant in planning for the waste management strategy for the operational phase should have regards to the following planning documents:

Policy ENV 12: Waste and Recycling Storage of the Westminster's Unitary Development Plan (UDP) approved on 24 January 2007.
The City of Westminster Recycling and Waste Storage Requirements updated 15 January 2019.

following historic map.



Communal open spaces, residential development and sensitive uses are propped under Class E therefore I recommend that contamination is scoped into the impact assessment.

Should you wish to discuss any of my comments please contact me directly

Gavin McIntosh
 Senior Practitioner

Technical Appendix 2.4: Ecological Impact Assessment

Technical Appendix 2.4: Ecological Impact Assessment

Intended for
Berkeley Homes (Central London) Limited

Date
March 2021

Project Number
1620009008

PADDINGTON GREEN POLICE STATION ECOLOGICAL IMPACT ASSESSMENT

PADDINGTON GREEN POLICE STATION ECOLOGICAL IMPACT ASSESSMENT

Project No. **1620009008**
Issue No. **Final**
Date **March 2021**
Made by **Laura Sanderson**
Checked by **Malcolm Robertson/Ben Seward**
Approved by **Michelle Wheeler**

Made by: "[Insert scanned signature]"
Checked/Approved by: "[Insert scanned signature]"

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Version Control Log

Revision	Date	Made by	Checked by	Approved by	Description
1	19/02/21	LS	MR/BS	MW	Issue for Client Comment
Final	29/03/21	LS	MW	MW	Issue for Planning

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CONTENTS

1.	INTRODUCTION	1
1.1	Background	1
1.2	Objectives	1
1.3	Site Location and Description	2
1.4	Proposed Development	3
1.5	Legislation and Policy Framework	4
2.	METHODOLOGY	5
2.1	Desk Study	5
2.2	Extended Phase 1 Habitat Survey	5
2.3	Daytime Building and Tree Inspection for Bats	6
2.4	Importance Criteria	7
2.5	Method of Assessment	8
2.6	Significance	8
2.7	Consultation	9
2.8	Limitations	9
3.	BASELINE CONDITIONS	10
3.1	Desk Study	10
3.2	Habitats	11
3.3	Species	12
3.4	Ecological Importance	13
4.	ASSESSMENT OF POTENTIAL EFFECTS, MITIGATION MEASURES AND RESIDUAL EFFECTS	14
4.1	Potential Effects	14
4.2	Mitigation and Enhancement Measures	15
4.3	Residual Effects	17
4.4	Summary	18
5.	CONCLUSIONS	20

LIST OF TABLES

Table 2.1: Building, Structure and Tree Bat Roost Potential Categories	7
Table 3.1: Sites of Importance for Nature Conservation within 1 km of Site..	10
Table 3.2: Ecological Importance of Features Present On-Site	13
Table 4.1: Summary of Potential and Residual Effects	18

LIST OF FIGURES

Figure 1.1: Site Location.....	1
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APPENDICES

1. INTRODUCTION

1.1 Background

Ramboll UK Limited ('Ramboll') was commissioned by Berkeley Homes (Central London) Limited (the 'Applicant') to undertake an Ecological Impact Assessment (EcIA) of a site located at 2-4 Harrow Road, Paddington, London, W2 1XJ (the 'site') in advance of the site's proposed redevelopment for a residential-led scheme (the 'proposed development'). The site is located at OS grid reference TQ 2696 8174 within the administrative boundary of the Westminster City Council (WCC), as shown in Figure 1.1.

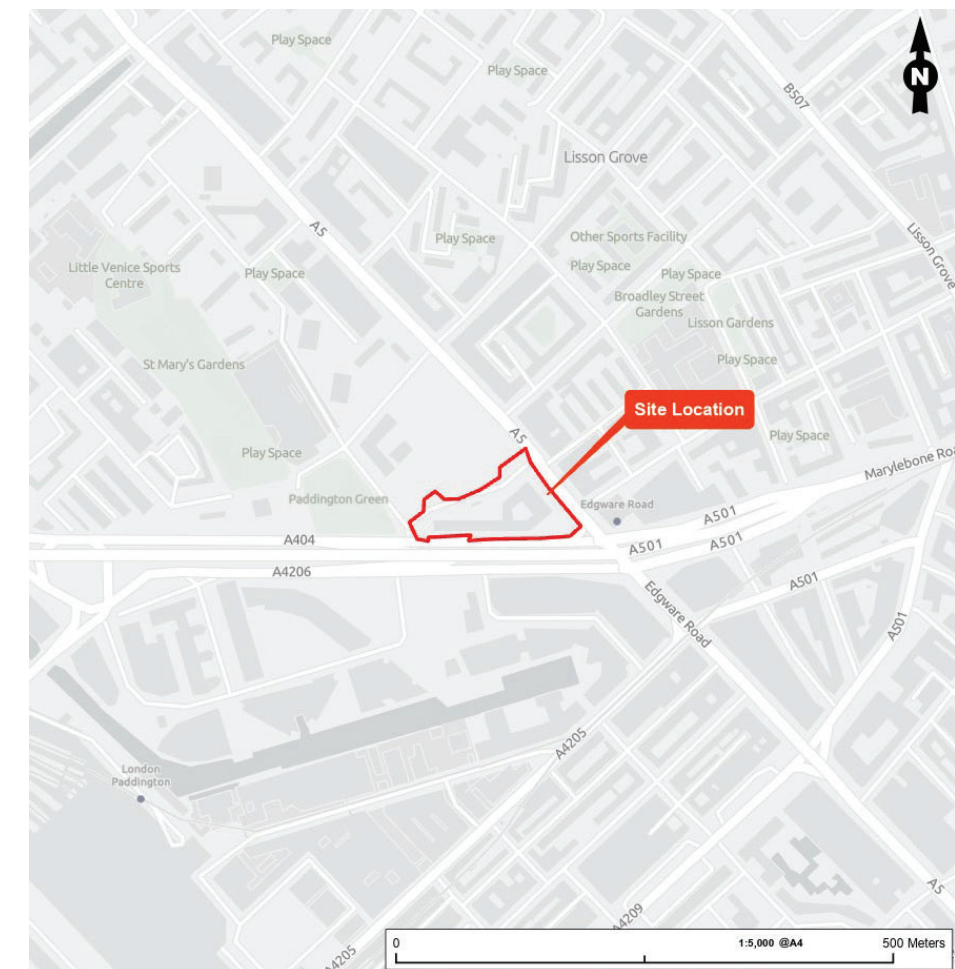


Figure 1.1: Site Location

1.2 Objectives

The aim of this report is to provide an EcIA in relation to the site and the zone of influence (ZOI) of the proposed development (CIEEM, 2019¹). The EcIA comprises a description of the existing on-site ecological conditions, as well as the ecological context of the site and its ZOI; an appraisal of the site's ecological importance; and an assessment of likely impacts in relation to the proposed development and its associated activities, taking into account the mitigation and enhancement measures incorporated into the proposed development. The structure and content of the report is

¹Chartered Institute of Ecology and Environmental Management (CIEEM), 2019. Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal and Marine. Chartered Institute of Ecology and Environmental Management, London.

based on current ecological report writing guidance (CIEEM, 2017² and BSI Standards Institution, 2013³).

The content of this report is based on the findings of:

- a desk study;
- an extended Phase 1 habitat survey; and
- a daytime inspection of buildings, structures and trees for bats.

The objectives of this report are to:

- identify designated nature conservation sites located either within the site or the ZOI of the proposed development;
- assess the potential for the site and the ZOI of the proposed development to support populations of protected species or species of nature conservation importance⁴;
- record the main habitats and features of ecological interest on the site;
- assess the ecological importance of the site;
- describe the proposed mitigation measures; and
- assess the potential impacts and likely residual effects of the proposed development.

The report is supported by the following appendices:

- Appendix 1: Figures;
- Appendix 2: Relevant Legislation and Policy;
- Appendix 3: Site Photographs; and
- Appendix 4: Landscape Proposals.

1.3 Site Location and Description

The site is located at 4 Harrow Road, Paddington, London W2 1XJ. The immediate boundaries of the site are defined by the following:

- West End Gate (WEG) development (ref: 16/12162/FULL under construction to be completed 2025) to the north;
- Edgware Road to the east;
- Harrow Road and the A40 to the south;
- Paddington Green Road and open space to the west; and
- 14-17 Paddington Green (ref: 16/11562/FULL and 16/11563/LBC) development site to the north-west which has recently been cleared by demolition works prior to the implementation of the WEG development.

² CIEEM, 2017. Guidelines for Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.

³ BSI Standards Institution, 2013. BS 42020:2013. Biodiversity – Code of Practice for Planning and Development. BSI Standards Limited, London.

⁴ The following species are considered to be of nature conservation importance i) listed as a national priority for conservation (such as those listed as habitats and species of principal importance for the conservation of biodiversity under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006; ii) listed as a local priority for conservation, for example in the relevant local Biodiversity Action Plan (BAP); iii) assessed as a threatened or near-threatened species according to International Union for the Conservation of Nature (IUCN) red list criteria; iv) Red or Amber Listed species in national Species of Conservation Concern assessments; v) listed as a Nationally Rare or Nationally Scarce species (e.g. in one of the Species Status Project reviews) or a Nationally Notable species where a more recent assessment of the taxonomic group has not yet been undertaken; and/or vi) endemic to a country or geographic location (including endemic sub-species, phenotypes, or cultural behaviours of a population that are unique to a particular place).

The site was acquired by the Applicant in 2020 following the vacation of the site by the Metropolitan Police as part of their London wide estate and disposals strategy. In this regard the neighbourhood policing function has been relocated to a new facility on Church Street. The site is currently predominantly vacant, aside from the Annex building on the western end of the site which is in lawful use as offices. However, at the time of the site visit undertaken for this assessment, the site was fully vacant.

The wider context surrounding the site is of a mixed nature with residential use predominant to the north, north-west and north-east with public open space in the form of Paddington Green to the west; small scale commercial along Edgware Road as part of the Edgware Road/Church Street district shopping centre which includes a street market; larger scale mixed-use to the south of the A40 in the Paddington Basin (including hotels; the Saint Mary's Hospital; offices; and residential uses); and educational facilities (including the City of Westminster College Paddington Green campus) to the north-west.

The Edgware Road London Underground Station (which is served by the Bakerloo Line) is located approximately 50 m to the east of the site. Paddington Mainline Station is located approximately 400 m to the south-west.

The site is surrounded by a number of tall buildings located in the Hall Place Estate (Hall Tower and Braithwaite Tower, Parsons House) and West End Gate to the north; and the Hilton London Metropole Hotel, Burne House, Capital House and Merchant Square development to the south. There are further tall buildings with planning permission in the Paddington basin which are partially or yet to be implemented.

1.4 Proposed Development

The planning application description of the proposed development is as follows:

“Demolition and redevelopment of the site to provide three buildings, providing private and affordable residential units (Class C3), commercial uses (Class E), flexible community/affordable workspace (Class E/F.1), provision of private and public amenity space, landscaping, tree and other planting, public realm improvements throughout the site including new pedestrian and cycle links, provision of public art and play space, basement level excavation to provide associated plant, servicing and disabled car and cycle parking, connecting through to the basement of the neighbouring West End Gate development.”

The proposed development would comprise the following:

- Demolition of the Paddington Green Police Station buildings;
- Excavation of a basement with a connection into the WEG development basement;
- Erection of three blocks (I, J, K) along, set back from, Harrow Road and Edgware Road;
- Delivery of office, commercial and residential uses, with associated amenity and landscaped residential gardens; and
- Stopping up of and realignment of Newcastle Place with associated public realm and landscaping.

The proposed land uses would comprise the following:

- 556 homes, including 210 affordable housing units (Class C3);
- 4,762 m² gross internal area (GIA) office floorspace (Class E);
- 1,088 m² GIA flexible community/affordable workspace (Class E/F1);
- 328 m² GIA affordable workspace ((Use Class E/F.1);

- Servicing, disabled parking and cycle parking at basement level; and
- Connection to the West End Gate (WEG) basement and energy centre with combined heat and power (CHP) plant.

The proposed building heights would be as follows:

- Block I – ground plus 17 storeys (18 storeys in total);
- Block J - ground plus 14 storeys (15 storeys in total); and
- Block K - ground plus 31 storeys (32 storeys in total).

The proposed development would be car free with the exception of minimal disabled parking provision. The proposed basement would be over two levels (B1 and B2), with B1 comprising an extension of the existing basement level and B2 comprising a deeper level, but over all small footprint.

The existing six trees on-site would be retained. In addition, the following landscaping is proposed:

- Residents roof garden with raised planters, multi-stem trees and mixed shrub and perennial planting at Block K level 25 (approximately 214 m²);
- Biodiverse roof garden with open-mosaic type habitat at the visual amenity space of Block K (approximately 170 m²);
- Residents roof garden with raised planters, multi-stem trees and mixed shrub and perennial planting at Block J roof level (approximately 621 m²);
- Ground level landscaping including; lawns, bulbs, rain gardens and planters (approximately 730 m²).
- Native hedgerow (50 m); and
- 121 new trees.

1.5 Legislation and Policy Framework

Various legislation and planning policies refer to the protection of wildlife. These are summarised in Appendix 2, but should not be regarded as a definitive legal opinion. When dealing with individual cases, the full texts of the relevant documents should be consulted and legal advice obtained if necessary.

2. METHODOLOGY

2.1 Desk Study

The purpose of the desk study was to collect existing baseline data about the site and the ZOI, such as the location of designated sites or other natural features of potential ecological importance such as woodland and ponds. The following ZOI has been considered:

- all statutory designated sites up to 1 km from the site, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), National Nature Reserves (NNR), Sites of Special Scientific Interest (SSSI) and Local Nature Reserves (LNR);
- non-statutory designated sites: Sites of Importance for Nature Conservation (SINCs) up to 1 km from the site;
- records of protected species up to 1 km from the site; and
- international and national statutory designated sites with bats as a qualifying feature for designation, up to 10 km from the site.

Greenspace Information for Greater London (GiGL) was contacted to provide details of designated sites and protected species within 2 km of the site. Due to data ownership restrictions in the reproduction of the GiGL report [Report Ref. 12011aw, dated 2 September 2020], it is not appended to this EcIA, but the information provided is summarised in the relevant sections. In addition, the Multi Agency Geographic Information for the Countryside (MAGIC) website⁵ was searched for supplementary information on statutory sites. This included a search for European Protected Species licences issued within 2 km of the site. Supplementary information on the site and its surroundings were obtained from aerial images available from Google™ Earth.

2.2 Extended Phase 1 Habitat Survey

An extended Phase 1 habitat survey of the site was undertaken by Laura Sanderson CEnv MCIEEM on 4 September 2020. Laura has a BSc in Zoology and an MSc in Wildlife Management and Conservation and has worked professionally as a consultant ecologist since 2005. The weather during the survey period was mild and dry with little wind.

The survey involved a site walkover and preliminary assessment of key habitats, land use and ecological features, particularly focusing on areas of natural interest which will be affected by the proposed development. The main habitats present were recorded using standard Phase 1 habitat survey methodology as described in the Handbook for Phase 1 Habitat Survey (JNCC, 2010⁶). Target notes were used to record habitats and features of particular interest. In addition to general habitat classification, a list was compiled of observed plant species (using the nomenclature of Stace, 2019⁷, with common and Latin names referred to in the first instance after which only the common names are used). The abundance of each species was estimated for each habitat respectively using the following standard 'DAFOR' codes:

- D = Dominant;
- A = Abundant;
- F = Frequent;
- O = Occasional; and

⁵ www.magic.gov.uk, accessed 2 September 2020.

⁶ Joint Nature Conservation Committee (JNCC), 2010. Handbook for Phase 1 habitat survey – a technique for environmental audit. JNCC Peterborough.

⁷ Stace, C., 2019. New Flora of the British Isles 4th Edition. Cambridge University Press.

- R = Rare.

The site was assessed for its potential to support protected and notable species such as birds, bats and badgers *Meles meles*, and was inspected for signs of any invasive plant species subject to legal controls. This was in order to identify potential ecological constraints and to guide recommendations for further survey requirements for these species.

2.3 Daytime Building and Tree Inspection for Bats

A daytime inspection of buildings, trees and structures was completed on 4 September 2020 during the extended Phase 1 habitat survey by Laura Sanderson. Laura is licensed to survey bats (Natural England Level 2 licence). Trees and the exterior elevations and of the site's buildings and structures were visually inspected for field evidence of roosting bats including droppings, urine staining, feeding remains and potential roosting points. In accordance with the guidance outlined in Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd edition (Collins, 2016⁸) each building was assessed for its potential to support bats. The following building types and features are considered to be of particular suitability to support roosting bats:

- Buildings of pre-20th or early 20th century construction;
- Agricultural buildings of brick, stone or timber construction;
- Large and complicated roof void(s) with unobstructed flying spaces;
- Large (>20 cm) roof timbers with mortise joints, cracks and holes;
- Entrances into buildings for bats to fly through;
- Poorly maintained buildings such that they provide access points for bats into roofs, walls, bridges, but at the same time not being too cool and draughty;
- Roof warmed by the sun e.g. south facing;
- Weatherboarding and/or hanging tiles with gaps;
- Undisturbed building roofs and structures;
- Buildings and built structures in proximity to each other providing a variety of roosting opportunities throughout the year; and
- Buildings and built structures close to good foraging habitat e.g. mature trees, parkland, woodland or wetland.

The following tree features are considered of particular suitability to support roosting bats:

- Natural holes;
- Woodpecker holes;
- Cracks / splits in major limbs;
- Loose bark;
- Bat, bird or mammal boxes;
- Partially detached large-stemmed ivy; and
- Other hollows / cavities.

Each building, structure and tree has been classified into a category dependent on the presence of features suitable to support bat roosts. The categories assigned were: Confirmed Roost, High, Moderate, Low and Negligible Potential for use by bats. Table 2.1 provides criteria for each of these categories. In addition, the suitability of the site for foraging and commuting bats was assessed.

⁸ Collins, J., 2016. Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition). Bat Conservation Trust (BCT).

Roost Potential	Description
Confirmed	A building, structure or tree that is confirmed to support a bat roost.
High	A building, structure or tree with one or more potential roost site that is obviously suitable for use by larger numbers of bats on a regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
Moderate	A building, structure or tree with one or more potential roost site that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
Low	A building or structure with one or more potential roost site that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection and / or suitable surrounding habitat to be used on a regular basis or by a large number of bats (i.e. unlikely to be suitable for hibernation or maternity). Trees of sufficient size and age to contain potential roost features but with none seen from the ground or features seen with very limited roosting potential.
Negligible	Negligible habitat features likely to be used by roosting bats and bats very unlikely to be present.
Notes: Category descriptions drawn from Collins (2016)	

2.4 Importance Criteria

The importance of ecological features (i.e. designated sites, habitats and species), identified within the zone of influence has been assessed using a scale that classifies ecological features within a defined geographic context in accordance with CIEEM guidelines (2019). The following frame of reference has been used for the site:

- International and European Importance;
- National Importance (England);
- Regional Importance;
- Borough Importance (City of Westminster);
- Local Importance (within an approximately 1 km radius of the site);
- Site-level⁹ Importance (limited to the site boundary or ZOI); and
- Negligible Importance.

Various characteristics contribute to the importance of ecological features. These include recognised and published criteria (e.g. Ratcliffe, 1977¹⁰, Wray *et al.* 2010¹¹) where the ecological features are assessed in relation to their size, diversity, naturalness, rarity, fragility, typicalness, connectivity with surroundings, intrinsic value, recorded history and potential importance.

A wide range of sources can be used to assign importance to ecological features, including legislation and policy. In the case of designated sites, their importance reflects the geographic context of the designation. For example, sites designated as SACs are recognised as being of importance at an International level. Ecological features not included in legislation and policy may

⁹ Note that Site-level is not defined in CIEEM, 2019. It is used here to define ecological features which contribute to the biodiversity importance of the site, but not at a level which can be considered locally important or higher. It is important in the context of biodiversity net gain.

¹⁰ Ratcliffe, D.A. (Ed.), 1977. A Nature Conservation Review. 2 vols. Cambridge University Press.

¹¹ Wray S, Wells D, Long E, Mitchell-Jones T., 2010. Valuing Bats in Ecological Impact Assessment, CIEEM In-Practice. 23-25.

also be assigned importance, due to, for example, local rarity or decline, or provision of a functional role for other ecological features. Professional judgement is used to assign such importance.

2.5 Method of Assessment

The ecological impact assessment has been undertaken by means of existing best practice tools and techniques as recommended by CIEEM. As such, potential impacts and effects on ecological features (as defined by baseline conditions) have been assessed taking into consideration mitigation measures integral to the proposed development; consideration has been given to the need for additional mitigation to reduce or off-set potential significant effects, and finally all residual effects have been assessed as either significant or not significant at the relevant geographic level. As part of this, consideration was given to the avoidance, mitigation, restoration, compensation and enhancement measures (the 'mitigation hierarchy') integral to the proposed development.

2.6 Significance

The potential impacts and likely effects on ecological features were considered in relation to the proposed development at the site. The assessment was made by reference to the pre-development baseline conditions at the site. The impacts and effects have been characterised according to the following variables:

- Magnitude and extent - quantitative size of an impact (e.g. area of habitat/number of individuals);
- Timing - when the impact may occur;
- Duration and reversibility - timescale of effect (days/weeks/months/years) until recovery. Permanent impacts are described as such, and likelihood of recovery is detailed where appropriate;
- Frequency - frequency of effect (if appropriate; described as low to high and quantified where possible);
- Complexity - whether the effect would directly or indirectly affect the feature; and
- Negative/ positive - if the effect would be beneficial or detrimental to the feature.

The assessment only describes those characteristics relevant to the ecological effect and determining the significance. For example, timing of when a habitat is destroyed may not be relevant in relation to the assessment of the effect on the habitat. However, it may be relevant to assessing the impact to the species that occur within the habitat (e.g. roosting bats).

In accordance with CIEEM guidance, each impact has been assessed as having a significant effect or not having a significant effect upon each ecological feature qualified with reference to the appropriate geographic scale. The importance level of the ecological feature concerned may be a determinant of the geographical level at which the effect is significant. For example, a significant effect to a Site of Special Scientific Interest (SSSI), is likely to be significant at a national level. However, it may be the case that the effect could be considered significant at a lower or higher geographical level than that at which the feature is important, depending on the magnitude of the effect. A significant effect is an effect that either enhances or undermines the conservation objectives of an ecological feature. Conservation objectives may be specific (e.g. for a designated site), or broad (e.g. national conservation policy).

2.7 Consultation

Details on the ecological assessment and proposed mitigation were included in the EIA Scoping Opinion Request¹².

2.8 Limitations

It should be noted that availability and quality of the data obtained during desk studies is reliant on third party responses. This varies from region to region and for different species groups. Furthermore, the comprehensiveness of data often depends on the level of coverage, the expertise and experience of the recorder and the submission of records to the local recorder. Accordingly, the conclusions in this report are valid only to the extent that the information provided to Ramboll was accurate, complete and available to Ramboll within the reporting schedule.

The extended Phase 1 habitat survey provides a snapshot of ecological conditions and does not record plants or animals that may be present on-site at different times of the year. The survey was undertaken during the optimum April to September Phase 1 habitat survey period when plants are generally visible.

Ramboll is satisfied that this report represents a robust appraisal of the site. If any action or development has not taken place on this land within 12 months of the date of this report, the findings of this survey should be reviewed by a suitably qualified ecologist and may need to be updated in line with CIEEM's 'Advice Note on the Lifespan of Ecological Reports and Surveys' (2019)¹³.

¹² Ramboll, 2020. 1620009008_4_PGPs EIA Scoping Opinion Request.

¹³ Chartered Institute of Ecology and Environmental Management (CIEEM), 2019. Advice Note on the Lifespan of Ecological Reports and Surveys. CIEEM, Winchester. Available online: <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf> [Accessed 04/09/2019].

3. BASELINE CONDITIONS

3.1 Desk Study

3.1.1 Landscape Context

The site is an urban location, with roads and buildings to the north, east and south. Paddington Green is immediately to the west, with roads and buildings beyond this, and Paddington Basin, Regent's Canal and the Paddington Arm of the Grand Union Canal are within 1 km of the site boundary to the north, south and west.

3.1.2 Designated Sites

Statutory Sites

No SPAs, SACs, SSSIs, NNRs or LNRs are located within 1 km of the site boundary, and no SACs designated for bats are present within 10 km of the site boundary.

Non-Statutory Sites

In London there are the following three tiers of SINC:

1. Sites of Metropolitan Importance (SMINC);
2. Sites of Borough Importance (Borough Grade I and Borough Grade II) (SBINC); and
3. Sites of Local Importance (SLINC).

GiGL identified nine SINCS located within 1 km of the site. These are listed in Table 4.1. No further designated sites are present within 1 km of the site.

Name	Type	Location	Reason for designation
London's Canals	Metropolitan	Approximately 200 m south at closest point, also north and west.	London's canals provide a home for many fish and aquatic plants.
Hyde Park and Kensington Gardens	Metropolitan	Over 500 m south.	The largest area of open space in central London, these Royal Parks have long been recognised as having considerable importance for their birds.
Hyde Park Gardens	Borough Grade II	Over 500 m south.	An attractive garden square, adjacent to Hyde Park, with a variety of habitats including woodland providing a home for a large number of common birds.
Little Venice Garden, Winston Garden and The Crescent Garden	Borough Grade II	Over 500 m north-west.	Three large communal back gardens in Maida Vale, which are home to many garden birds.
St Mary's Churchyard and Paddington Green	Borough Grade II	Immediately adjacent to the site boundary to the west.	This historic churchyard and associated open spaces combine cultural, wildlife and amenity value in a densely built-up area beside the Westway and Paddington Station.

Name	Type	Location	Reason for designation
Park Square Gardens	Borough Grade II	Approximately 100m north-west.	A garden square particularly valuable for birds.
Lisson Garden	Local	Approximately 260 m east	A small children's playground and garden, in a heavily built up area just to the north of Marylebone Road, which has been developed on unusually naturalistic lines.
Talbot Square	Local	Over 500 m south.	A garden square with a range of wildlife habitats.
Hallfield Primary School and Housing Estate	Local	Over 500 m well10	A school and housing estate with a good range of wildlife habitats, reported to be supporting a population of hedgehogs.

The Westminster City Plan (2016) identifies the site as a site of wildlife deficiency.

3.2 Habitats

The following descriptions of habitats should be read in conjunction with the Phase 1 Habitat Plan in Appendix 1.

3.2.1 General Site Description

The site consists of the following:

- A single, interconnected building, albeit with a number of different, interrelated built forms, with hardstanding. This includes the 17 storey accommodation/section house on the eastern side of the site, a main office and police front of house 3-storey building below this on the eastern side of the site, and an 8 storey annex at the western side of the site, connected by a single storey building that previously housed high security cells;
- A single level of basement and a surface level podium car park to the rear, both accessed from Newcastle Place;
- Newcastle Place;
- An electricity substation in the north-eastern corner; and
- Six existing trees.

The remaining areas of the site are formed of concrete, asphalt, cobble and paved hardstanding.

3.2.2 Ephemeral/Short Perennial

Small amounts of scattered ephemeral vegetation are present, growing in cracks in hardstanding in the west and south-east of the site. These include occasional Canadian fleabane *Erigeron canadensis*, dandelion *Taraxacum officinale* agg., common nettle *Urtica dioica*, smooth sow-thistle *Sonchus oleraceus*, dove's-foot cranesbill *Geranium molle* and small butterfly bush *Buddleja davidii* plants.

Small amounts of scattered ephemeral vegetation is of negligible ecological importance.

3.2.3 Buildings and Structures

The existing structures on the site comprise:

- A 14 storey concrete tower block (with a flat concrete roof) rising above a three storey courtyard block in the east; (17 storeys in total);
- A 1 storey brick and concrete link block and raised surfaced car parking area in the centre. The link block has a temporary corrugated metal roof on scaffolding. Small, single-storey brick buildings with flat concrete roofs are present in the car-parking area; and
- An 8 storey concrete tower block (with a flat concrete roof) in the west.

The buildings are underlain by a one level of basement previously used for on-site parking.

The suitability of the buildings for use by birds and bats is described in Section 4.3. The buildings are of negligible ecological importance in their own right.

3.2.4 Hardstanding

The remaining areas of the site are formed of concrete, tarmac, cobble and paving hardstanding. Hardstanding is of negligible ecological importance.

3.2.5 Street Trees

Six street trees are present on the pavements surrounding the buildings, within the site boundary. These include one mature London plane *Platanus x hispanica* trees, semi-mature lime *Tilia* sp. trees and young Turkish hazel *Corylus colurna*.

Street trees contribute to the amenity value of the surrounding area, as well as supporting birds and invertebrates, and are therefore of Site level importance. The suitability of the trees for use by birds and bats is described in Section 3.3.

3.2.6 Invasive Species

No invasive species subject to legal control were recorded on the site.

3.3 Species

3.3.1 Invertebrates

Records of a small number of invertebrates from within 1 km of the site, including Wildlife and Countryside Act protected stag beetle *Lucanus cervus*, were provided by GiGL.

The site is of negligible suitability for use by important invertebrates including stag beetle, due to the lack of suitable habitat. It is therefore of negligible importance for invertebrates.

3.3.2 Birds

GiGL data provided records of a large number of bird species from within 1 km of the site. Those which may be relevant to the site include starling *Sturnus vulgaris* (Birds of Conservation Concern (BoCC) red list¹⁴), house sparrow *Passer domesticus* (BoCC red list), black redstart *Phoenicurus ochruros* (Wildlife and Countryside Act 1981 Schedule 1 species, BoCC red list) and swift *Apus apus*. No evidence of these species was recorded on the site.

Feral pigeon *Columba livia domestica* and magpie *Pica pica* were recorded on the site during the survey. The buildings on the site are suitable for nesting by feral pigeon, and the street trees are suitable for use by nesting and foraging common urban bird species. The site is not considered to be suitable for use by black redstart due to the lack of foraging and nesting habitat on site and in the local area. The site is considered to be of Site level importance for birds.

¹⁴ Eaton MA, Aebischer NJ, Brown AF, Hearn RD, Lock L, Musgrove AJ, Noble DG, Stroud DA and Gregory RD. 2015. Birds of Conservation Concern 4: the population status of birds in the United Kingdom, Channel Islands and Isle of Man. British Birds 108, 708-746. Available online at britishbirds.co.uk/wp-content/uploads/2014/07/BoCC4.pdf

3.3.3 Bats

Records of a number of bat species, including Daubenton's *Myotis daubentonii*, noctule *Nyctalus noctula* and common and soprano pipistrelles *Pipistrellus pipistrellus* and *P. pygmaeus* were provided from within 1 km of the site, with the closest being from 203 m west of the site.

Although some crevices were present on the exterior of the buildings, including broken cladding around the entrance porch on the south-east side of the building and open windows, the site is not considered to be suitable for use by roosting bats due to the very urban, disturbed and well-lit nature of the site with no foraging opportunities in the immediate vicinity. No features suitable for roosting bats are present on the street trees.

The site is not suitable for regular use by foraging or commuting bats, due to its very urban nature with no habitat suitable for invertebrate prey species. The nearest area of habitat potentially suitable for use by foraging and roosting bats is St Mary's Churchyard and Paddington Green to the west of the site.

The site is therefore considered to be of negligible importance for bats.

3.3.4 Other Protected Species

Records of a number of other species from within 1 km of the site were provided by GiGL, including common frog *Rana temporaria*, slow-worm *Anguis fragilis* and hedgehog *Erinaceus europaeus*.

The site is not suitable for use by other protected or notable species such as amphibians, reptiles and badgers, due to the lack of suitable habitat and poor or no connectivity to suitable habitat elsewhere.

3.4 Ecological Importance

Table 3.2 presents the ecological importance of habitats and species present on the site, in accordance with CIEEM guidance. Species assessed as being unlikely to be present on the site are not considered further in this assessment.

Feature	Ecological Importance	Rationale
Ephemeral/Short Perennial Vegetation	Negligible	Very small amount of scattered vegetation growing in cracks, unlikely to significantly contribute to the biodiversity importance of the site.
Buildings and Structures	Negligible	Does not contribute to biodiversity importance of the site.
Hardstanding	Negligible	Does not contribute to biodiversity importance of the site.
Street Trees	Site Level	Contribute to amenity value of surrounding area and support birds and invertebrates.
Invertebrates	Negligible	Very limited numbers of common invertebrates likely to use the site as part of wider resource.
Birds	Site Level	Building may be used by nesting feral pigeon, and street trees suitable for use by foraging and nesting common bird species.
Bats	Negligible	Site is not suitable for regular use by bats.

4. ASSESSMENT OF POTENTIAL EFFECTS, MITIGATION MEASURES AND RESIDUAL EFFECTS

This section describes potential impacts that could arise from the proposed development on the site, in the absence of mitigation, and outlines mitigation measures that have been included in the redevelopment proposals to avoid significant impacts on ecological features and maximise biodiversity enhancement. Residual effects are then described.

The proposed development would result in the removal of all buildings and replacement with three buildings of up to 32 storeys. Areas of landscape planting including a biodiverse roof garden with open-mosaic type habitat (approximately 170 m²), residents roof garden with raised planters, flower-rich perennial planting (approximately 835 m²), approximately 50 m native hedgerows, tree avenues, lawns, podium planting and approximately 121 new native and ornamental trees are proposed. In line with planning policy (as described in Appendix 2), any development should aim for no net loss of biodiversity.

4.1 Potential Effects

4.1.1 Designated Sites

St Mary's Churchyard and Paddington Green SINC is located adjacent to the site. This is a Borough Grade II site, listed for its plant and bird communities. Although the SINC would not be directly impacted as a result of the proposed development, there is potential for indirect impacts on it as a result of development proposals. A number of other SINCs are present in the wider area, but due to their distance from the site, effects as a result of the proposed development are not considered likely. In the absence of mitigation, the proposed development would likely result in the following effects at the demolition and construction stage and the completed development stage:

- Demolition and Construction Stage: Significant Negative effect at up to the Local Level, due to pollution, noise disturbance, dust and waste run off; and
- Completed Development: No Significant effects.

4.1.2 Habitats

Redevelopment of the site would lead to the loss of all buildings, hardstanding, and ephemeral/short perennial vegetation. The street trees would be retained.

Buildings, hardstanding and ephemeral/short perennial vegetation are assessed as being of Negligible importance and are not considered further. The street trees are of importance at the Site level.

In the absence of mitigation, the proposed development would likely result in the following effects at the demolition and construction stage and the completed development stage:

- Demolition and Construction Stage: Significant Negative effect at the Site Level, due to the potential for unmitigated impacts on trees (e.g. inadvertent or accidental damage from construction activity); and
- Completed Development Stage: Following the establishment of habitats which may take up to three years, and provided habitats are managed appropriately, Significant Positive effects at the Site Level.

4.1.3 Species

Invertebrates

The site is considered to be of Negligible importance for invertebrates. In the absence of mitigation, the proposed development would likely result in the following effects at the demolition and construction stage and the completed development stage:

- Demolition and Construction Stage: No Significant effects; and
- Completed Development Stage: Following the establishment of habitats which may take up to three years, and provided habitats features for invertebrates are managed appropriately, Significant Positive effects at the Site Level.

Birds

Loss of habitat at the site would potentially affect nesting birds, for which the site is of Site level importance, and if undertaken at the wrong time of year could result in contravention of wildlife legislation. Therefore, the loss of these habitats would likely result in the following effects at the demolition and construction stage and the completed development stage:

- Demolition and Construction Stage: Significant Negative effect at the Site Level; and
- Completed Development Stage: Following the establishment of habitats which may take up to three years, and provided habitat features for birds are managed appropriately, Significant Positive effects at the Local Level.

Bats

The site is of Negligible importance for bats, and in the absence of mitigation, the development of the site would likely result in the following effects at the demolition and construction stage and the completed development stages:

- Demolition and Construction Stage: No significant effects; and
- Completed Development Stage: No significant effects.

4.2 Mitigation and Enhancement Measures

4.2.1 Designated Sites

The proposed development would be subject to a Construction Environmental Management Plan (CEMP) which would be secured via an appropriately worded planning condition under Westminster's Code of Construction Practice provisions, which will include measures to reduce run-off, noise, lighting and dust impacts caused during the demolition and construction period, to avoid impacts on surrounding habitats and species.

The CEMP would include the following:

- Specifications for the appropriate timing of works. For example, where possible, demolition would be undertaken between September and February, outside of the bird nesting period; and
- Pollution prevention measures to prevent work causing run-off, air and noise pollution, as well hydrological changes to habitats.

4.2.2 Habitats

The following new habitat would be provided within the proposed development, providing considerable biodiversity and amenity enhancement for the site, as shown in the landscape masterplan (see Appendix 4):

- Areas of landscape planting including a biodiverse roof garden with open-mosaic type habitat, residents roof garden with raised planters, multi-stem trees and mixed shrub and perennial planting, hedgerows, trees, lawns, rain gardens, podium planting, are proposed.
- Landscape planting, including wildlife friendly species, with trees and hedgerows, are proposed. Species incorporated would be predominately native (including native fruiting and nectar-producing shrub species and trees), but the mix would also include non-native species with known biodiversity importance. The planting scheme would not include any potentially invasive non-native species.
- Approximately 170 m² biodiverse roof garden with open-mosaic type habitat, are proposed. The species mix for the biodiverse roof would comprise at least 20 species and include plants of known benefit for pollinators, including a number listed on the Royal Horticultural Society's (RHS) 'Plants for Pollinators' list such as yarrow *Achillea millefolium*, vipers bugloss *Echium vulgare* and common cowslip *Primula veris*. Additional biodiversity features would be incorporated onto the roof such as log piles, stone piles and sand to attract invertebrates and provide nesting habitat for them.

For the retained street trees, root protection zones would be included, in accordance with BS 5837:2012 – 'Trees in relation to design, demolition and construction. Recommendations'¹⁵.

A Habitat Management Plan (HMP) would be produced for the site. This document would detail management activities necessary to cover up to the first 10 years of site operation and would contain, among other detail; information on planting regimens, mowing schedules and what to do should habitats fail.

A Biodiverse Roof Strategy (BRS) would be produced to detail management practices associated with biodiverse roof. The aim of the document would be to ensure favourable condition of the of roof and maximise their potential ecological importance. The BRS would be read in conjunction with the roof maintenance information provided by the specialist roof contractor.

Both the HMP and BRS would be secured by means of an appropriately worded planning condition.

If invasive species are identified during the planting process, the plants would be discarded and disposed of appropriately. Plants imported from outside the UK would be avoided to prevent introducing invasive species.

4.2.3 Species

Invertebrates

Provision of landscape planting with known biodiversity importance, as well as green infrastructure would be of benefit to invertebrate species using the site, and once established, would provide enhancement for invertebrates.

Invertebrate boxes or 'bee hotels' are proposed and would provide additional interest and enhancement for invertebrates such as bees. The exact number and type of box would be agreed following consultation with an ecologist prior to the build stage.

Features of interest for invertebrates would also be included on the biodiverse roof, including sand and stone piles, and log piles.

¹⁵ British Standards Institute (BSI), 2012. BS 5837:2012 – Trees in relation to design, demolition and construction. Recommendations. April 2012.

Breeding Birds

All wild nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended). As such, any works to the off-site trees (such as pruning) would be undertaken between September and February, outside of the bird nesting season.

Feral pigeon can nest all year round, and therefore the demolition of the buildings would be undertaken following checks for nests. It may be necessary to consult a pest control specialist to prevent new nesting activity, in advance of clearance works.

The provision of landscape planting within the redevelopment would provide new habitat for use by foraging and nesting birds, enhancing the site for birds. Furthermore, a variety of bird nest box types would be provided at suitable locations on the site, attached to or built within buildings and other infrastructure, as mitigation for loss of habitat and additional enhancement. Boxes suitable for house sparrow, starling and swifts would be included. The exact type, number (expected to be a minimum of five) and location of bird boxes would be agreed following consultation with an ecologist prior to the build stage.

Bats

Provision of landscape planting and green infrastructure with native vegetation would potentially provide an enhancement opportunity for bats. Though proposed in the EIA Scoping Opinion Request Report, the provision of bat boxes is not considered appropriate to this site due to its highly urban and well-lit nature.

4.3 Residual Effects

4.3.1 Designated Sites

Following the implementation of the CEMP, the proposed development of the site is likely to result in the following residual effects at the demolition and construction stage and completed development stage:

- Demolition and Construction Stage: **No significant** effects; and
- Completed Development Stage: **No significant** effects.

4.3.2 Habitats

Following the implementation of the proposed landscaping scheme, as well the production of an appropriate management plan, the proposed development of the site is likely to result in the following residual effects at the demolition and construction stage and completed development stage:

- Demolition and Construction Stage: **No significant** effects; and
- Completed Development Stage: Following the establishment of habitats which may take up to three years, and provided habitats are managed appropriately, **Significant** Positive effects at the **Site** Level.

4.3.3 Species

Invertebrates

Following the implementation of the proposed landscaping scheme, as well the introduction of biodiversity features to provide habitat for invertebrates, the proposed development of the site is likely to result in the following residual effects at the demolition and construction stage and completed development stage:

- Demolition and Construction Stage: **No significant** effects; and

- Completed Development Stage: Following the establishment of habitats which may take up to three years, and provided habitats features for invertebrates are managed appropriately, **Significant** Positive effects at the **Site** Level.

Breeding Birds

Following works to trees and buildings at appropriate times of the year so as to avoid the bird breeding season and following appropriate checks, the implementation of the proposed landscaping scheme, as well the introduction of bird boxes; the development of the site is likely to result in the following residual effects at the demolition and construction stage and completed development stage:

- Demolition and Construction Stage: **No Significant** effects; and
- Completed Development Stage: Following the establishment of habitats which may take up to three years, and provided habitat features for birds are managed appropriately, **Significant** Positive effects at the **Local** Level.

Bats

Following the implementation of the proposed landscaping scheme; the proposed development of the site is likely to result in the following residual effects at the demolition and construction stage and completed development stage:

- Demolition and Construction Stage: **No Significant** effects; and
- Completed Development Stage: **No Significant** effects.

4.4 Summary

Table 4.1 contains a summary of the potential effects pre-mitigation, and likely residual effect post-mitigation. As can be seen, provided mitigation and enhancements are incorporated, the scheme would likely lead to long-term positive effects for habitat, invertebrates, breeding birds and bats.

Table 4.1: Summary of Potential and Residual Effects			
Feature	Ecological Importance	Potential Effects	Likely Residual Effects following Mitigation
St Mary's Churchyard and Paddington Green SINC	Borough	Demolition and Construction: Significant, Negative, Local Level Completed Development: Not Significant	Demolition and Construction: Not Significant Completed Development: Not Significant
Habitats	Site	Demolition and Construction: Significant, Negative, Site Level Completed Development: Significant, Positive, Site Level	Demolition and Construction: Not Significant Completed Development: Significant, Positive, Site Level
Invertebrates	Negligible	Demolition and Construction: Not Significant Completed Development: Significant, Positive, Site Level	Demolition and Construction: Not Significant Completed Development: Significant, Positive, Site Level

Table 4.1: Summary of Potential and Residual Effects			
Feature	Ecological Importance	Potential Effects	Likely Residual Effects following Mitigation
Birds	Site	Demolition and Construction: Significant, Negative Site Level Completed Development: Significant, Positive, Local Level	Demolition and Construction: Not Significant Completed Development: Significant, Positive, Local Level
Bats	Negligible	Demolition and Construction: Not Significant Completed Development: Not Significant	Demolition and Construction: Not Significant Completed Development: Not Significant

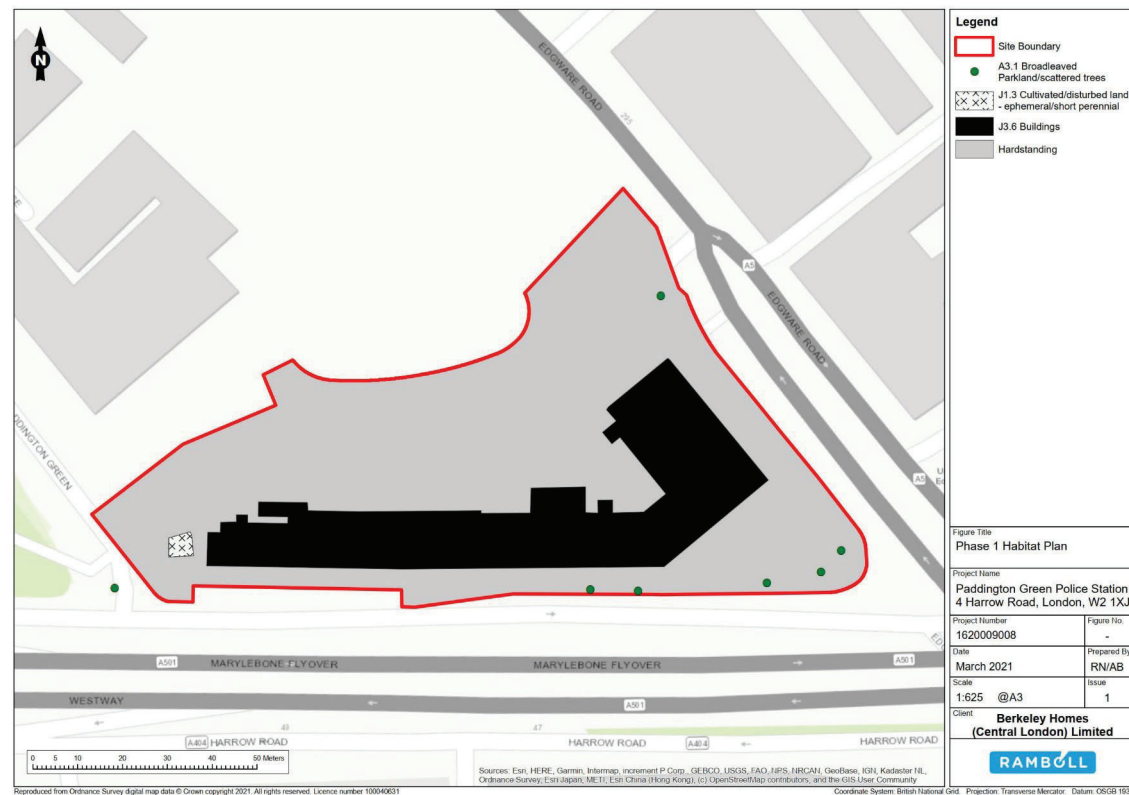
5. CONCLUSIONS

The Phase 1 habitat survey and bat surveys confirmed that the site is of nature conservation importance at up to the Site level. Opportunities for significant enhancement of the sites biodiversity are possible, through the provision of new landscape planting including trees and green infrastructure. By undertaking the work in accordance with the commitments and recommendations made in this report, the proposed development is likely to be in conformity with relevant planning policy and legislation relating to ecology. Furthermore, a biodiversity net gain in excess of 10% can comfortably be achieved¹⁶. Following the implementation of the mitigation and enhancements listed here, negative impacts on biodiversity would be avoided, and in the long term the proposed development would provide numerous significant benefits to biodiversity.

APPENDIX 1 FIGURES

¹⁶ Ramboll, 2021. 1620009008. PGPS BNG Assessment Report.

**APPENDIX 2
RELEVANT LEGISLATION AND POLICY**



Phase 1 Habitat Plan

RELEVANT LEGISLATION AND POLICY

Ecological features are protected under various United Kingdom (UK) and European legislative instruments. These are described below. European legislation is not included as it is incorporated in UK legislation by domestic provisions.

Legislation

The Conservation of Habitats and Species Regulations 2017 (As Amended)

The Habitats Directive (Council Directive 92/43/EEC)¹⁷ came into force in 1992 and provides for the creation of a network of protected wildlife areas across the European Union (EU), known as 'Natura 2000'. The Natura 2000 network consists of Special Areas of Conservation (SAC) designated under the Habitats Directive and Special Protection Areas (SPA) designated under the Birds Directive (Council Directive 79/409/EEC)¹⁸. These sites are part of a range of measures aimed at conserving important or threatened habitats and species.

The Conservation of Habitats and Species Regulations 2017¹⁹ (commonly known as the 'Habitats Regulations') transposes the Habitats Directive into national law and set out the provisions for the protection and management of species and habitats of European importance, including Natura 2000 sites. The 2017 bill consolidated all previous versions of the regulations and subsequent amendments since initial transposition, bringing them all under the single heading, and made some minor amendments. It extends to England and Wales, and to a limited extent Scotland and Northern Ireland. Further amendments were made via The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018²⁰ to ensure they reflect recent European case law (C-323/17 People Over Wind and Sweetman v Coillte Teoranta) in relation to the assessment of plans and projects on sites protected under Council Directive 92/43/EEC on the conservation of natural habitats of wild fauna and flora (the 'Habitats Directive'). In Scotland, the Habitats Directive is transposed through a combination of the Habitats Regulations 2010 (in relation to reserved matters) and the Conservation (Natural Habitats &c.) Regulations 1994. The Conservation (Natural Habitats, &c) Regulations (Northern Ireland) 1995 (as amended) transposes the Habitats Directive in relation to Northern Ireland.

In addition to providing for the designation and protection of Natura 2000 sites, the Habitats Regulations provide strict protection for plant and animal species as European Protected Species. Derogations from prohibitions are transposed into the Habitats Regulations by way of a licensing regime that allows an otherwise unlawful act to be carried out lawfully for specified reasons and providing certain conditions are met. Under the Habitats Regulations, competent authorities have a general duty, in the exercise of any of their functions, to have regard to the Habitats Directive and Wild Birds Directive including in the granting of consents or authorisations. They may not authorise a plan or project that may adversely affect the integrity of a European site, with certain exceptions (considerations of overriding public interest).

The Conservation of Habitats and Species Regulations 2017, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, require the Secretary of State and Welsh Ministers to secure compliance with the requirements of the Nature Directives. Any new powers in the 2019 Regulations must be exercised in line with the Directives and retained EU case law up to 1 January 2021.

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019²¹

¹⁷ European Commission, 1992. Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora.

¹⁸ European Commission, 1979. Council Directive 79/409/EEC on the conservation of wild birds.

¹⁹ Her Majesty's Stationery Officer (HMSO), 2017. The Conservation of Habitats and Species Regulations 2017. HMSO.

²⁰ Her Majesty's Stationery Officer (HMSO), 2018. The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018. HMSO.

²¹ Secretary of State, 2019. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Her Majesty's Stationery Office (HMSO)

SACs and Special Protection Areas (SPAs) in the UK no longer form part of the EU's Natura 2000 ecological network. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 have created a national site network on land and at sea, including both the inshore and offshore marine areas in the UK. The national site network includes:

- existing SACs and SPAs; and
- new SACs and SPAs designated under these Regulations.

Any references to Natura 2000 in The Conservation of Habitats and Species Regulations 2017, as amended and in guidance now refers to the new national site network. Maintaining a coherent network of protected sites with overarching conservation objectives is still required in order to:

- fulfil the commitment made by government to maintain environmental protections; and
- continue to meet our international legal obligations, such as the Bern Convention, the Oslo and Paris Conventions (OSPAR), Bonn and Ramsar Conventions.

Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap with SACs and SPAs, and may be designated for the same or different species and habitats. All Ramsar sites remain protected in the same way as SACs and SPAs.

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 establish management objectives for the national site network. These are called the network objectives.

The UK Government and devolved administrations (in Wales, Northern Ireland and Scotland) will cooperate to manage, and where necessary, adapt the network to contribute towards meeting the network objectives.

Any references in the 2017 Regulations to meeting the 'requirements of the Directives' includes achieving the network objectives.

The appropriate authorities may publish guidance relating to these requirements. The appropriate authorities are the Secretary of State for Environment, Food and Rural Affairs in England and the Welsh Ministers in Wales.

The network objectives are to:

- maintain or, where appropriate, restore habitats and species listed in Annexes I and II of the Habitats Directive to a favourable conservation status (FCS); and
- contribute to ensuring, in their area of distribution, the survival and reproduction of wild birds and securing compliance with the overarching aims of the Wild Birds Directive.

The appropriate authorities must also have regard to the:

- importance of protected sites;
- coherence of the national site network; and
- threats of degradation or destruction (including deterioration and disturbance of protected features) on SPAs and SACs.

The network objectives contribute to the conservation of UK habitats and species that are also of pan-European importance, and to the achievement of their FCS within the UK.

The Countryside and Rights of Way Act 2000

The Countryside and Rights of Way Act 2000²² primarily extends to England and Wales. It provides a new statutory right of access to the countryside and modernises the rights of way system, bringing into force stronger protection for both wildlife and the countryside.

²² Her Majesty's Stationery Officer (HMSO), 2000. The Countryside and Rights of Way Act 2000. HMSO.

The Act is divided into five distinct sections, with Part III of relevance to ecology:

- Part III – Nature Conservation and Wildlife Protection: The Act details measures to promote and enhance wildlife conservation. These measures include improving protection for Sites of Special Scientific Interest (SSSI) and increasing penalties for deliberate damage to SSSIs. Furthermore, the Act affords statutory protection to Ramsar Sites which are wetlands designated under the International Convention on Wetlands²³.

The Wildlife and Countryside Act 1981 (As Amended)

The Wildlife and Countryside Act 1981 (as amended)²⁴ forms the basis of much of the statutory wildlife protection in the UK. Part I deals with the protection of plants, birds and other animals and Part II deals with the designation of SSSIs.

This Act covers the following broad areas:

- Wildlife – listing endangered or rare species in need of protection and creating offences for killing, disturbing or injuring such species. Additionally, the disturbance of any nesting bird during breeding season is also noted as an offence, with further protection for species listed on Schedule 1. Measures for preventing the establishment of non-native plant and animal species as listed on Schedule 9 are also provided;
- Nature Conservation – protecting those sites which are National Nature Reserves (NNR) and SSSIs;
- Public Rights of Way – placing a duty on the local authority (to maintain a definitive map of footpaths and rights of way. It also requires that landowners ensure that footpaths and rights of way are continually accessible; and
- Miscellaneous General Provisions.

The Act is enforced by local authorities.

Natural Environment and Rural Communities Act 2006

Under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006²⁵, public authorities must show regard for conserving biodiversity in all their actions. Public authorities should consider how wildlife or land may be affected in all the decisions that they make. The commitment to the biodiversity duty must be measured by public authorities.

Section 41 also requires the Secretary of State to publish a list of habitats and species that are of principal importance for the conservation of biodiversity in England.

Protection of Badgers Act 1992

The Protection of Badgers Act 1992²⁶ consolidated previous legislation relating specifically to badgers. The Act makes it an offence to kill, injure or take a badger, or to damage or interfere with a sett unless a licence is obtained from a statutory authority (i.e. Natural England).

Wild Mammals (Protection) Act 1996

²³ United Nations Educational, Scientific and Cultural Organization (UNESCO), 1971. Convention on Wetlands of International Importance especially as Waterfowl Habitat, as amended in 1982 and 1987. Ramsar, Iran Published in Paris, 1994.

²⁴ Her Majesty's Stationery Office (HMSO), 1981. The Wildlife and Countryside Act 1981 [as amended in Quinquennial Review and by the Countryside and Rights of Way Act 2000 and the Natural Environment and Rural Communities Act 2006]. HMSO.

²⁵ Her Majesty's Stationery Office (HMSO), Natural Environment and Rural Communities Act 2006. HMSO.

²⁶ Her Majesty's Stationery Office (HMSO), 1992. Protection of Badgers Act 1992. HMSO.

The Wild Mammals (Protection) Act 1996²⁷ makes it an offence for any person to mutilate, kick, beat, nail or otherwise impale, stab, burn, stone, crush, drown, drag or asphyxiate any wild mammal with intent to inflict unnecessary suffering. There are certain exemptions including acts of mercy and acts made lawful by means of hunting, shooting, coursing or pest control activities.

Policy

Biodiversity in the Planning Process

Administrative and policy guidance on the application of some of these statutory obligations is provided through relevant Government policy guidance and advice. In England, this includes National Planning Policy Framework 2019, national Planning Practice Guidance, Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System, Biodiversity 2020 and Natural Environment White Paper 'The natural choice: securing the value of nature'.

National Planning Policy Framework 2019

The National Planning Policy Framework (NPPF)²⁸ sets out the Government's planning policies for England and how these are expected to be applied. Objective 15 - Conserving and enhancing the natural environment' states that the planning system should contribute to and enhance the natural and local environment by:

- "...protecting and enhancing valued landscapes, geological conservation interests and soils;
- recognising the wider benefits of ecosystem services; and
- minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures..."

It furthermore advises local planning authorities to conserve and enhance biodiversity when considering planning applications, by applying principles aimed at protecting and enhancing biodiversity and designated sites and incorporating biodiversity in and around developments

Planning Practice Guidance 2019

The Planning Practice Guidance²⁹ is a web-based resource launched in June 2019 (last updated 1 October 2019). This guidance is divided into sections, of which Natural Environment: Biodiversity, Ecosystems and Green Infrastructure provides information on biodiversity issues within planning and guidance on where to find further information on biodiversity issues.

Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System

This circular³⁰ provides administrative guidance on the application of the law relating to planning and nature conservation as it applies in England. It complements the national planning policy in the NPPF and PPG.

Natural Environment White Paper. The Natural Choice: Securing the Value of Nature

²⁷ Her Majesty's Stationery Office (HMSO), Wild Mammals (Protection) Act 1996. HMSO.

²⁸ Ministry of Housing, Communities and Local Government, 2019. National Planning Policy Framework (NPPF), last updated 19 June 2019. London: HMSO.

²⁹ Ministry of Housing, Communities & Local Government, 2019. Planning Practice Guidance [online]. Available at: <http://planningguidance.planningportal.gov.uk/>

³⁰ Office of the Deputy Prime Minister, 2005. Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System. Available at: <https://www.gov.uk/government/publications/biodiversity-and-geological-conservation-circular-06-2005>

The Natural Environment White Paper³¹ outlines the Government's vision for the natural environment over the next 50 years, shifting the emphasis to an integrated landscape-scale approach. It describes the actions that will be taken to deliver that goal.

Biodiversity 2020

The Biodiversity 2020³² strategy for England builds on the Natural Environment White Paper and provides a comprehensive picture of how England is implementing its international and EU commitments. It sets out the strategic direction for biodiversity policy on land (including rivers and lakes) and at sea.

The mission for this strategy is to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.

It is anticipated that this will be delivered through:

- a more integrated large-scale approach to conservation on land and at sea;
- putting people at the heart of biodiversity policy;
- reducing environmental pressures; and
- improving our knowledge.

Biodiversity Action Plans

In 1994, the Government produced the UK Biodiversity Action Plan (BAP)³³, a national strategy for the conservation of biodiversity. This led to the creation of the UK Biodiversity Steering Group, which has listed 1,150 Species Action Plans (SAPs) and 65 Habitat Action Plans (HAPs). Regional and District/Borough BAPs apply the UK BAP at a local level.

From July 2012, the 'UK Post-2010 Biodiversity Framework'³⁴ succeeds the UK BAP. This is a result of a change in strategic thinking following the publication of the 'Convention on Biological Diversity's Strategic Plan for Biodiversity 2011-2020'³⁵ and its 20 'Aichi targets'³⁶, at Nagoya, Japan in October 2010, and the launch of the new EU Biodiversity Strategy (EUBS) in May 2011.

The UK Post-2010 Biodiversity Framework constitutes the UK's response to these new 'Aichi' strategic goals and associated targets. The Framework recognises that most work which was previously carried out under the UK BAP is now focussed on the individual countries of the UK (and Northern Ireland) and delivered through each countries' own strategies.

Following the publication of the new Framework, the UK BAP partnership no longer operates. However, many of the tools and resources originally developed under the UK BAP remain of use. The UK list of priority species has been used to help draw up statutory lists of priorities in England, Scotland, Wales and Northern Ireland. For England, this is in line with Section 41 of NERC.

Regional Policy

London Biodiversity Action Plan 2007

The overarching biodiversity action plan for the Greater London area is contained within the London BAP³⁷. This sets out the priority habitats and species for the area and provides action plans for

³¹ Department for Environment, Food and Rural Affairs (Defra), 2011. Natural Environment White Paper. The natural choice: securing the value of nature. Available at: <https://www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature>

³² Department for Environment, Food and Rural Affairs (Defra), 2011. Biodiversity 2020. Available at: <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>

³³ Her Majesty's Stationery Office (HMSO), 1994. Biodiversity: The UK Action Plan. HMSO.

³⁴ JNCC and Defra (on behalf of the Four Countries' Biodiversity Group), 2012. UK Post-2010 Biodiversity Framework. July 2012.

³⁵ <https://www.cbd.int/sp/>

³⁶ <https://www.cbd.int/sp/targets/>

³⁷ London Biodiversity Partnership, 2007. London Biodiversity Action Plan.: <http://www.gigl.org.uk/about-gigl/londons-biodiversity-action-plan/>

these priority habitats and species, as listed in the table below. Further important habitats and species do not currently have their own BAPs; these are also listed in the table below. The London Biodiversity Partnership was disbanded in 2013.

London BAP Habitats	London BAP Species
Acid grassland	Bats
Chalk grassland	Black poplar
Heathland	House sparrow
Parks and urban greenspaces	Mistletoe
Private gardens	Reptiles
Reed beds	Sand martin
Rivers and streams	Stag beetle
Standing water	Water vole
Tidal Thames	Other Important Species
Wasteland	Black redstart
Woodland	Common dormouse
Other Important Habitats	Grey heron
Built structures	Otter
Meadows and pastures	Peregrine falcon
Fen, marsh and swamp	
Open landscapes with ancient/old trees	

The Mayor's Biodiversity Strategy 2002

The Mayor's Biodiversity Strategy³⁸ aims to protect and enhance the natural habitats of London together with their species. It presents 14 detailed policies and 72 implementation proposals around a number of themes including the protection of biodiversity, blue ribbon network, managing wildlife habitats and connecting people to nature.

Of note are the following proposals:

- Proposal 5: The Mayor will, and boroughs should, take account of the protection of wildlife habitats and biodiversity in the consideration of all planning applications; and
- Proposal 8: Where biodiversity assessments are submitted, the Mayor expects the options to be refined only after full investigation of the existing ecological conditions and consideration of the potential impacts of options.

The Mayor's Biodiversity Strategy 2002

The Mayor's Biodiversity Strategy³⁹ aims to protect and enhance the natural habitats of London together with their species. It presents 14 detailed policies and 72 implementation proposals around a number of themes including the protection of biodiversity, blue ribbon network, managing wildlife habitats and connecting people to nature. Of note are the following proposals:

- Proposal 5: The Mayor will, and boroughs should, take account of the protection of wildlife habitats and biodiversity in the consideration of all planning applications; and

³⁸ Greater London Authority, 2002. Connecting with London's Nature - The Mayor's Biodiversity Strategy. London. GLA

³⁹ Greater London Authority, 2002. Connecting with London's Nature - The Mayor's Biodiversity Strategy. London. GLA.

- Proposal 8: Where biodiversity assessments are submitted, the Mayor expects the options to be refined only after full investigation of the existing ecological conditions and consideration of the potential impacts of options.

The London Plan, March 2021

The London Plan⁴⁰, published on 2 March 2021 sets out an integrated economic, environmental, transport and social framework for development in Greater London and runs from 2019 – 2041. This new London Plan replaces all previous versions of the London Plan. Policies of relevance to biodiversity are contained within Chapter 8 (Green Infrastructure and Natural Environment of this document. These are:

- G1: Green Infrastructure;
- G4: Open Space;
- G5: Urban Greening;
- G6: Biodiversity and Access to Nature; and
- G7: Trees and Woodlands.

Local Policy

Westminster Biodiversity Action Plan 2008

Westminster's Biodiversity Action Plan⁴¹ has been produced by the Westminster Biodiversity Partnership, and aims to prevent the decline of - and improve conditions for - species and habitats that are a conservation priority.

Those listed are:

Habitats

- Built Environment;
- Churchyards and Cemeteries;
- Parks and Green Spaces;
- Private Gardens;
- Standing Open Water; and
- Tidal Thames.

Species

- Bats,
- Buttoned Snout Moth;
- Hedgehog;
- House Sparrow; and
- Tawny Owl.

Westminster Open Spaces and Biodiversity Strategy 2019

This strategy⁴² has a number of priorities, with associated commitments. The priorities include the following:

- Protecting existing green assets;
- Prioritising city greening by creating new green infrastructure

⁴⁰ Greater London Authority, 2021. The London Plan: The Spatial Development Strategy for Greater London. London, GLA.

⁴¹ Westminster Biodiversity Partnership. 2008. Westminster Biodiversity Action Plan. Available online: <https://www.westminster.gov.uk/biodiversity-action-plan#:~:text=Westminster's%20Biodiversity%20Action%20Plan%20aims,to%20improving%20biodiversity%20in%20Westminster.>

⁴² City of Westminster. 2019. Westminster Open Spaces and Biodiversity Strategy. Available online: https://www.westminster.gov.uk/sites/default/files/draft_strategy_for_open_spaces_and_biodiversity.pdf

- Biodiversity and Wildlife;
- High standards; and
- Managing and balancing demands.

Westminster City Plan 2016

The Westminster City Plan (2016)⁴³ set out the vision for the City of Westminster up to and beyond 2026/27 and included a number of policies that relate to biodiversity:

- S35: Open Space;
- S36: Sites of Importance for Nature Conservation;
- S37: Westminster's Blue Ribbon Network; and
- S38: Biodiversity and Green Infrastructure.

The Council submitted a new plan, the City Plan 2019-2040⁴⁴, to the Secretary of State in November 2019. Following the Inspectors' Report of the City Plan 2019-2040 received on 19 March 2021, the council will now proceed towards formal adoption of the City Plan 2019-2040. Within the new plan, the following policies relate to biodiversity:

- Policy 34 (Green Infrastructure): this replaces policies S35, S6 and S37 of the 2016 City Plan; and
- Policy 31 (Waterways and Waterbodies): this replaces policy S37 of the 2016 City Plan.

⁴³ City of Westminster. 2016. Westminster City Plan. Available online: <https://www.westminster.gov.uk/planning-building-and-environmental-regulations/city-plan-neighbourhood-planning-and-planning-policy/westminsters-city-plan-and-unitary-development-policies-udp/city-plan>

⁴⁴ City of Westminster. 2021. City Plan 2019 – 2040: Intend to Adopt Version March 2021. Available online: <https://www.westminster.gov.uk/planning-building-and-environmental-regulations/city-plan-neighbourhood-planning-and-planning-policy/city-plan-2019-2040>

APPENDIX 3
SITE PHOTOGRAPHS



Photo 1.

View of building site from south-east, showing street trees on pavement in front of buildings, with main tower behind.



Photo 2.

Southern boundary of the site, with covered building on the left and street tree in the centre.

Title: Photographic Log	Client: Berkeley Homes (Central London)
Site: Paddington Green Police Station	Date: September 2020



Photo 3. Podium parking area in central part of site, with covered building on southern boundary in centre and smaller tower in west in background.



Photo 4. Smaller tower in west of site in foreground, with larger tower to right in background, viewed from the west.



Photo 5. Example of ephemeral vegetation growing in unmanaged paving cracks, in west of site.



Photo 6. Example of gaps into building, with damaged underside of porch at main entrance on south-east corner of site. Not considered to be suitable for roosting due to site setting.

Title: Photographic Log	Client: Berkeley Homes (Central London)
Site: Paddington Green Police Station	Date: September 2020

Title: Photographic Log	Client: Berkeley Homes (Central London)
Site: Paddington Green Police Station	Date: September 2020

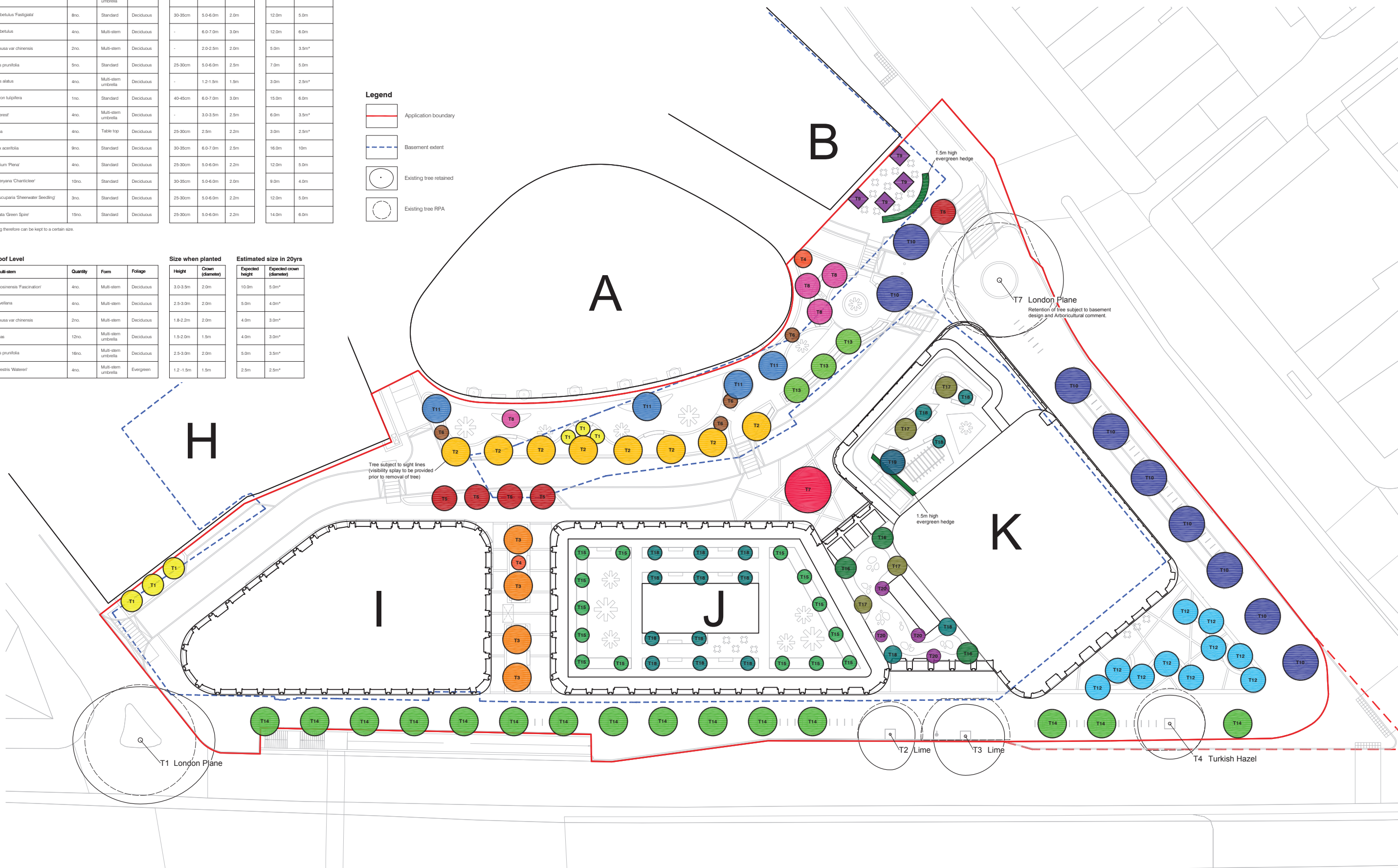
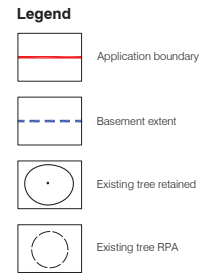
APPENDIX 4
LANDSCAPE PROPOSALS

Tree Planting Schedule and Size Guide

Ground Level				Size when planted			Estimated size in 20yrs		
Code	Tree or multi-stem	Quantity	Form	Foliage	Girth	Height	Crown (diameter)	Expected height	Expected crown (diameter)
T1	Amelanchier lamarckii	8no.	Multi-stem umbrella	Deciduous	-	2.5-3.0m	2.0m	5.0m	3.0m*
T2	Carpinus betulus 'Fastigiata'	8no.	Standard	Deciduous	30-35cm	5.0-6.0m	2.0m	12.0m	5.0m
T3	Carpinus betulus	4no.	Multi-stem	Deciduous	-	6.0-7.0m	3.0m	12.0m	6.0m
T4	Cornus kousa var chinensis	2no.	Multi-stem	Deciduous	-	2.0-2.5m	2.0m	5.0m	3.5m*
T5	Crataegus pruinifolia	5no.	Standard	Deciduous	25-30cm	5.0-6.0m	2.5m	7.0m	5.0m
T6	Euconymus alatus	4no.	Multi-stem umbrella	Deciduous	-	1.2-1.5m	1.5m	3.0m	2.5m*
T7	Liriodendron tulipifera	1no.	Standard	Deciduous	40-45cm	6.0-7.0m	3.0m	15.0m	6.0m
T8	Malus 'Everest'	4no.	Multi-stem umbrella	Deciduous	-	3.0-3.5m	2.5m	6.0m	3.5m*
T9	Morus alba	4no.	Table top	Deciduous	25-30cm	2.5m	2.2m	3.0m	2.5m*
T10	Platanus x acerifolia	9no.	Standard	Deciduous	30-35cm	6.0-7.0m	2.5m	18.0m	10m
T11	Prunus avium 'Pena'	4no.	Standard	Deciduous	25-30cm	5.0-6.0m	2.2m	12.0m	5.0m
T12	Pyrus calleryana 'Charitckler'	10no.	Standard	Deciduous	30-35cm	5.0-6.0m	2.0m	9.0m	4.0m
T13	Sorbus aucuparia 'Sheenwater Seedling'	3no.	Standard	Deciduous	25-30cm	5.0-6.0m	2.2m	12.0m	5.0m
T14	Tilia cordata 'Green Spire'	15no.	Standard	Deciduous	25-30cm	5.0-6.0m	2.2m	14.0m	6.0m

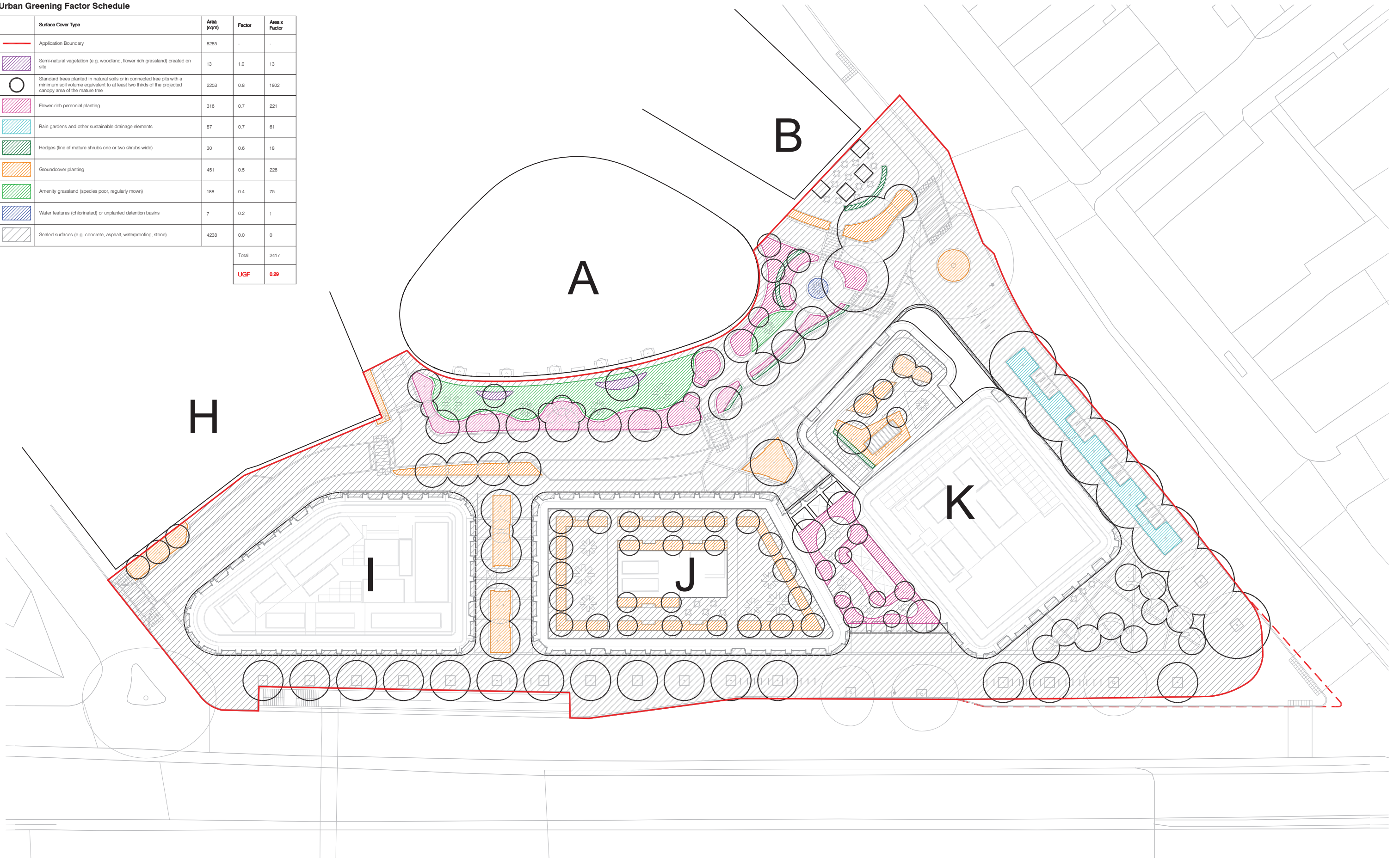
*Maintained by clipping therefore can be kept to a certain size.

Podium and Roof Level				Size when planted		Estimated size in 20yrs		
Code	Tree or multi-stem	Quantity	Form	Foliage	Height	Crown (diameter)	Expected height	Expected crown (diameter)
T15	Betula albosinensis 'Fascination'	4no.	Multi-stem	Deciduous	3.0-3.5m	2.0m	10.0m	5.0m*
T16	Corylus avellana	4no.	Multi-stem	Deciduous	2.5-3.0m	2.0m	5.0m	4.0m*
T17	Cornus kousa var chinensis	2no.	Multi-stem	Deciduous	1.8-2.2m	2.0m	4.0m	3.0m*
T18	Cornus mas	12no.	Multi-stem umbrella	Deciduous	1.5-2.0m	1.5m	4.0m	3.0m*
T19	Crataegus pruinifolia	16no.	Multi-stem umbrella	Deciduous	2.5-3.0m	2.0m	5.0m	3.5m*
T20	Pinus sylvestris 'Waterfall'	4no.	Multi-stem umbrella	Evergreen	1.2-1.5m	1.5m	2.5m	2.5m*







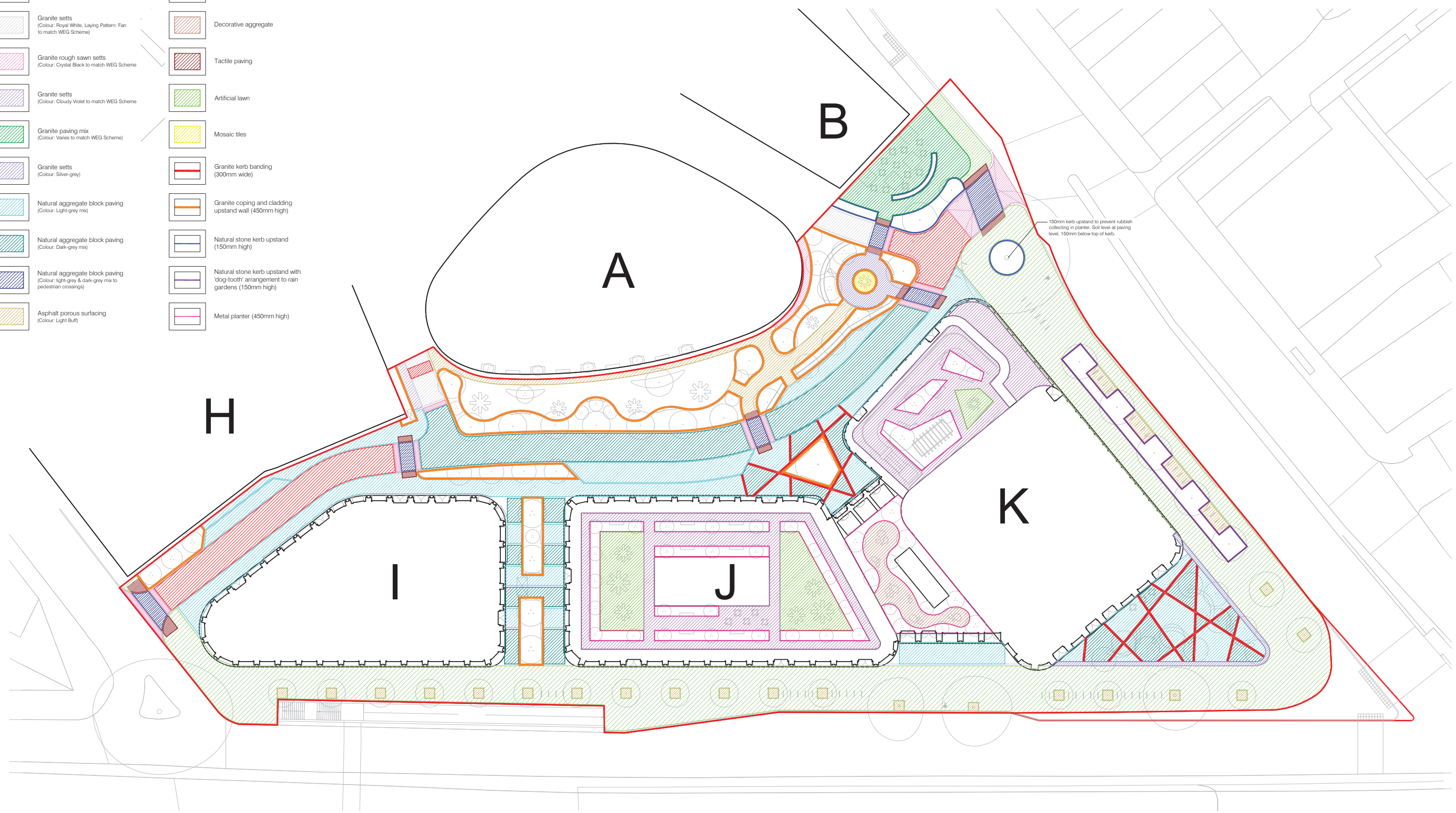
Urban Greening Factor Schedule

Surface Cover Type	Area (sqm)	Factor	Area x Factor
Application Boundary	8285	-	-
Semi-natural vegetation (e.g. woodland, flower rich grassland) created on site	13	1.0	13
Standard trees planted in natural soils or in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree	2253	0.8	1802
Flower-rich perennial planting	316	0.7	221
Rain gardens and other sustainable drainage elements	87	0.7	61
Hedges (line of mature shrubs one or two shrubs wide)	30	0.6	18
Groundcover planting	451	0.5	226
Amenity grassland (species poor, regularly mown)	188	0.4	75
Water features (chlorinated) or unplanted detention basins	7	0.2	1
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone)	4238	0.0	0
Total			2417
UGF			0.29







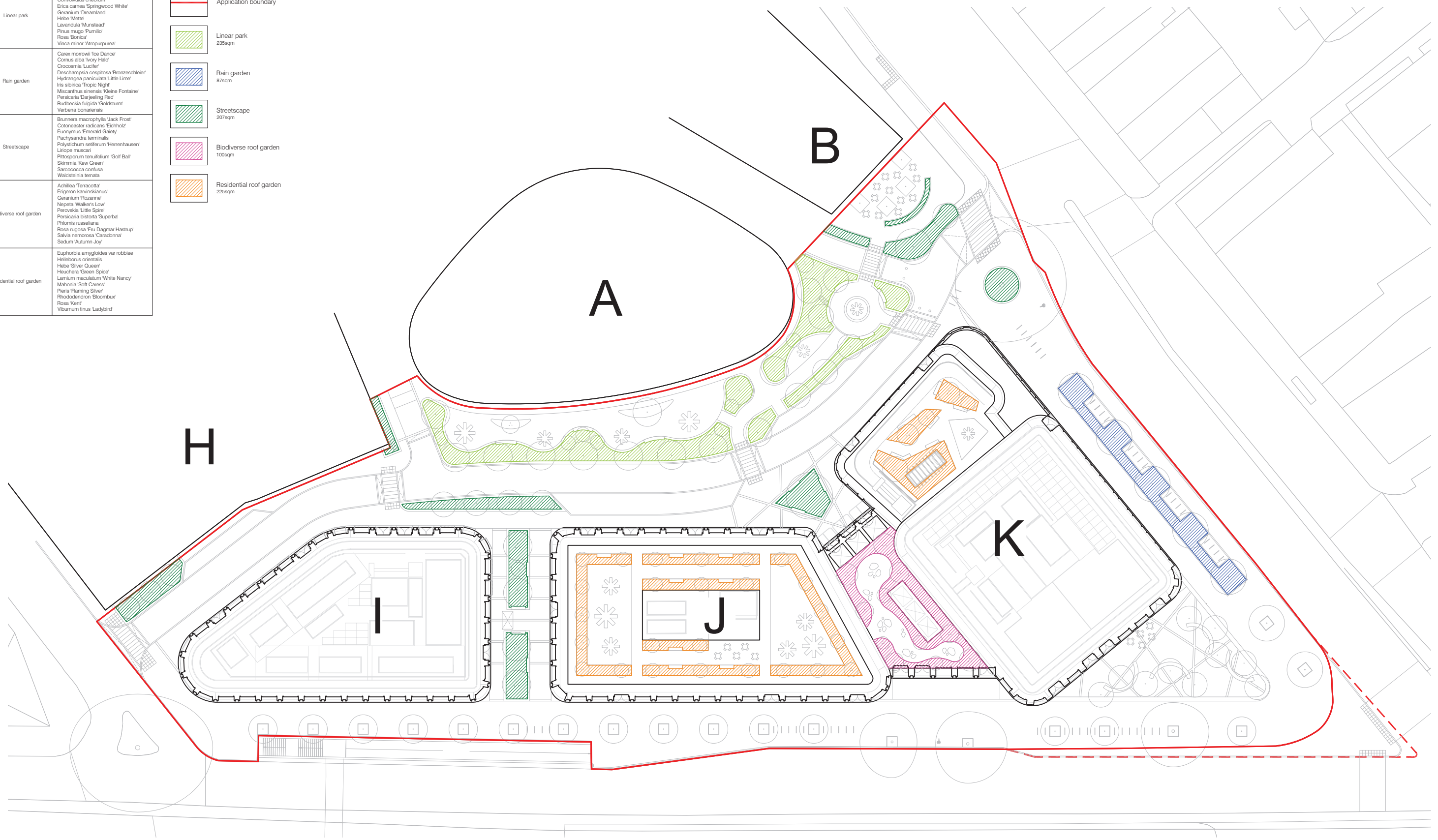
Legend

- | | | | |
|--|--|---|--|
|  | Application boundary |  | Flag paving to adoptable standards |
|  | Granite setts
(Colour: Kobra to match WEG Scheme) |  | Natural stone flag paving |
|  | Granite setts
(Colour: Royal White, Laying Pattern: Fan to match WEG Scheme) |  | Decorative aggregate |
|  | Granite rough sawn setts
(Colour: Crystal Black to match WEG Scheme) |  | Tactile paving |
|  | Granite setts
(Colour: Cloudy Violet to match WEG Scheme) |  | Artificial lawn |
|  | Granite paving mix
(Colour: Varies to match WEG Scheme) |  | Mosaic tiles |
|  | Granite setts
(Colour: Silver-grey) |  | Granite kerb banding
(300mm wide) |
|  | Natural aggregate block paving
(Colour: Light-grey mix) |  | Granite coping and cladding
upstand wall (450mm high) |
|  | Natural aggregate block paving
(Colour: Dark-grey mix) |  | Natural stone kerb upstand
(150mm high) |
|  | Natural aggregate block paving
(Colour: light-grey & dark-grey mix to pedestrian crossings) |  | Natural stone kerb upstand with
'dog-tooth' arrangement to rain
gardens (150mm high) |
|  | Asphalt porous surfacing
(Colour: Light Buff) |  | Metal planter (450mm high) |



Landscape Character Area	Shrub and perennial species
Linear park	Abelia Little Richard Cistus Silver Pink Convolvulus creorum Erica carnea Springwood White Geranium Dreamland Hebe Mette Lavandula Munstead Pinus mugo Purnillo Rosa Bonica Vinca minor Atropurpurea
Rain garden	Carex montowi 'Ice Dance' Cornus alba 'Ivory Halo' Crocosmia Lucifer Deschampsia cespitosa Bronzeschieeler Hydrangea paniculata Little Lime Iris sibirica Tropic Night Miscanthus sinensis Kleine Fontaine Persicaria Dajepingi Red Rutbeckia fulgida 'Goldsturm' Verbena bonariensis
Streetscape	Brunnera macrophylla Jack Frost Cotoneaster radicans Eichholz Euonymus Emerald Gaety Sieringia New Green Pachysandra terminalis Polystichum setiferum Herrenhausen Liriodendron muscari Pittosporum tenuifolium 'Golf Ball' Skimmia 'New Green' Sarcococca confusa Waldsteinia ternata
Biodiverse roof garden	Achillea Terracotta Erigeron karvinskianus Geranium Rozanne Nepeta Walker's Low Perovskia Little Spire Persicaria bistorta 'Superba' Phlomis russeliana Rosa rugosa 'Fu Dagmar Hastrup' Salvia nemorosa 'Caradornna' Sedum 'Autumn Joy'
Residential roof garden	Euphorbia amygdaloides var rotbbiae Helleborus orientalis Hebe Silver Queen Heuchera Green Spice Lamium maculatum White Nancy Mahonia Soft Caress Pieris Flaming Silver Rhododendron 'Bloombox' Rosa Kent Viburnum tinus Ladybird

Legend	
	Application boundary
	Linear park 235sqm
	Rain garden 87sqm
	Streetscape 207sqm
	Biodiverse roof garden 100sqm
	Residential roof garden 225sqm



Technical Appendix 2.5: Ground Conditions Preliminary Risk Assessment

Intended for
Berkeley Homes (Central London) Limited

Date
March 2021

Project Number
1620009008

PADDINGTON GREEN POLICE STATION GROUND CONDITIONS PRELIMINARY RISK ASSESSMENT

PADDINGTON GREEN POLICE STATION GROUND CONDITIONS PRELIMINARY RISK ASSESSMENT

Project No. **1620009008**
Issue No. **Final**
Date **March 2021**
Made by **Lucy Baker/Jessica Gregory**
Checked by **Matthew Pannett/Ben Seward**
Approved by **Michelle Wheeler**

Made by:
Checked/Approved by: "[Insert scanned signature]"

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CONTENTS

EXECUTIVE SUMMARY	I
1. INTRODUCTION	1
1.1 Background	1
1.2 Objectives	1
1.3 Scope of Works	1
1.4 Proposed Redevelopment	1
1.5 General Limitations and Reliance	3
2. SITE OBSERVATIONS	4
2.1 Site Setting	4
2.2 Site Layout and Activities	4
2.3 Storage of Chemicals and Hazardous Substances	5
2.4 Water, Wastewater and Drainage	6
2.5 Waste Storage and Disposal	6
2.6 Deleterious Materials	7
2.7 Air Emissions	8
2.8 Other Issues	8
2.9 Potential for Ground Contamination from Current Uses	8
3. HISTORICAL AND REGULATORY INFORMATION	9
3.1 Map History	9
3.2 Environmental Database Records	10
3.3 Regulatory Authority Enquiries	11
3.4 Historical Potential for Ground Contamination	12
4. ENVIRONMENTAL SETTING	13
4.1 Geology and Hydrogeology	13
4.2 Coal Mining	15
4.3 Hydrology	15
4.4 Ecology	15
4.5 Environmental Sensitivity and Vulnerability	16
5. CONCEPTUAL SITE MODEL	17
5.1 Introduction	17
5.2 Potential Sources of Contamination	17
5.3 Receptors	17
5.4 Potential Pathways	18
5.5 Preliminary Conceptual Site Model	19
6. CONCLUSIONS	21

LIST OF TABLES

Table 2.1: Adjacent and Surrounding Land Uses	4
Table 3.1: Summary of Key Environmental Database Information	10
Table 4.1: Summary of Geology and Hydrogeology	13
Table 4.2: Licensed Groundwater Abstractions within 2 km of Site	14
Table 4.3: Licensed Surface Water Abstractions within 2 km of Site	15
Table 5.1: Potential Sources of Contamination.....	17
Table 5.2: Potential Receptors to Contamination.....	18
Table 5.3: Potential Pathways for Contamination	19
Table 5.4: Conceptual Site Model - Potential Completed Development Pollutant Linkages.....	19
Table 5.5: Conceptual Site Model - Potential Demolition and Construction Pollutant Linkages.....	20

APPENDICES

Appendix 1	Figures
Appendix 2	Selected Historical Maps
Appendix 3	Photographic Log

EXECUTIVE SUMMARY

Ramboll UK Limited was commissioned by Berkeley Homes (Central London) Limited to carry out a Preliminary Risk Assessment of a site located at 2-4 Harrow Road, Paddington, London, W2 1XJ. The assessment is required in respect of the site's proposed redevelopment for a residential-led scheme. The objectives of the assessment were to consider the potential for soil or groundwater contamination, both at and in the study area of the site.

The site is currently occupied by Newcastle Place (a roadway) and Paddington Green Police Station, which has been in this location since the 1970s. The on-site buildings and the car parking area is underlain by a single level basement. Within the basement and on the ground floor there is evidence of oil storage for boilers. This oil storage appears to be in dedicated plant rooms, which reduces the risk of ground contamination occurring from oil spills or leaks. No other significant potentially contaminative activities were identified during the site inspection.

Historically - early and mid-20th century - the site was occupied by multiple units with the potential to cause ground contamination. These included part of a garage with a sunk petrol tank, a timber store, smithy, wood working workshop, slaughterhouse, garage and theatre. These activities were cleared in the late 1960s and the site was used as a coach park. The Police Station was developed in the early 1970s. Potential historic ground contaminants could include oils and fuels, asbestos fibres, metals, volatile organic compounds and other hydrocarbon compounds. Made Ground/fill of unknown composition is likely to be present due to past redevelopments.

The immediate surrounds have historically included potentially contaminative light industrial uses including garages, workshops, warehouses, factories, tramway and a sawmill. Historic building plans from the mid-1950s to 1970 show a garage (partially on-site) extended off-site to the north undertaking oil storage and paint spraying facilities. Potential contaminants from these off-site sources are similar to the site's history. The site is not particularly identifiable from its surroundings and a background level of contamination is likely to be present in the study area.

Westminster City Council has stated that in Westminster there are currently no contaminated land sites or 'Special Sites' as they are known under the Environmental Protection Act 1990 within their jurisdiction, and the Environmental Health Department have stated that there are no known ground contamination issues associated with the site.

The site is located within a low sensitivity location with regard to groundwater resources. Both the superficial deposits and natural bedrock underlying the site and immediate surrounding area are classified as Unproductive Strata. The site is not located within a Groundwater Source Protection Zone and there are no groundwater abstractions for public potable water supply within a 2 km radius.

The site is also located within a low sensitivity area with regard to surface water resources. The nearest surface watercourse is the Paddington Basin approximately 150 m south, connecting to the Grand Union Canal and Regents Canal at the junction of Little Venice 750 m north-west of the site. There are two surface water abstractions within 2 km of the site; however, none of the abstractions are for sensitive uses such as for public potable water supply.

The site is located within Flood Zone 1 (Low Probability).

St Mary's Churchyard and Paddington Green Park Square Gardens Borough Grade II Site of Importance for Nature Conservation is located immediately to the west of the site. An Ecology Impact Assessment accompanies the application.

The site is located within the Watling Street Tier II Archaeological Priority Area and the Paddington Tier II Archaeological Priority Area. An Archaeological Desk Based Assessment accompanies the application.

Part of Newcastle Place is located within the Paddington Green Conservation Area. A Heritage Statement, as well as a Townscape, Visual and Built Heritage Impact Assessment accompany the application.

Potential pollutant linkages associated with the history of the site include risks to human health from dermal contact, inhalation and ingestion of contaminated soils and risks from vapours or ground gases migrating into new buildings. Future building cover and clean soils in landscaping could mitigate some potential pollutant linkages (i.e. providing a barrier to the soil). As is standard for a brownfield site redevelopment, potential risks would be assessed through a site investigation and risk assessment. The investigation and risk assessment would be undertaken at an appropriate point before redevelopment work starts on-site. Remediation works cannot be completely ruled out until the investigation and risk assessment have been undertaken; however, given that the basement excavation would remove potentially contaminated soil, the requirement for extensive remediation is considered unlikely.

Development works would also consider the potential for contamination to be present and how this is managed. For example, this could include health and safety of workers, piling risk assessment, Sustainable Drainage System (SuDS) assessment, appropriate classification of contaminated soils and potential for asbestos and other contaminants to be present. Hazardous materials in buildings, such as oil tanks and asbestos, would also be considered and measures taken to prevent pollution during demolition and construction.

On the basis of the above, significant adverse environmental effects are considered unlikely. Site Investigation Works and associated remediation and validation works (if necessary) would be secured by means of an appropriately worded planning condition.

1. INTRODUCTION

1.1 Background

Ramboll UK Limited was commissioned by Berkeley Homes (Central London) Limited (the 'Applicant') to carry out a Preliminary Risk Assessment of a site located at 2-4 Harrow Road, Paddington, London, W2 1XJ. The assessment is required in respect of the site's proposed redevelopment for a residential-led scheme. The objectives of the assessment were to consider the potential for soil or groundwater contamination, both at and in the study area of the site.

The site is within the jurisdiction of Westminster City Council (WCC).

1.2 Objectives

The objectives of the assessment were to assess the potential for soil or groundwater contamination, both at and in the study area of the site.

1.3 Scope of Works

The scope of the PRA comprised the following:

- Review of historical, recent and current Ordnance Survey plans to identify activities which might have led to contamination of soil or groundwater (for example, from manufacturing processes, from storage activities or waste disposal practices) both on the site and on adjacent sites;
- Review of published records and drawings on the shallow and deep geology and hydrogeology of the site to assess the vulnerability and sensitivity of groundwater and surface water resources to contamination, if present, and the possible direction of movement off site, if mobile;
- Search of a proprietary database of environmental permits, records and incidents at the site and surrounding study area;
- Enquiries of the Local Authority Planning and Environmental Health Departments to obtain information on environmental conditions, incidents and known contamination risks and on the Local Authority's Contaminated Land Strategy;
- Enquiries of the Petroleum Enforcement Authority to determine if records exist of above ground or below ground licensed (petrol) storage facilities; and
- A site visit.

1.3.1 Scope of Works Notable Exceptions and Restrictions

No sampling or analysis of soils, waters or other materials has been carried out as part of the PRA.

The assessment did not include an audit of operational environmental compliance issues or environmental compliance requirements associated with close-down of operations and site exit.

The assessment specifically excluded a detailed assessment as to the presence and condition of asbestos or asbestiform containing materials at the site.

1.4 Proposed Redevelopment

The planning application description of the proposed development is as follows:

"Demolition and redevelopment of the site to provide three buildings, providing private and affordable residential units (Class C3), commercial uses (Class E), flexible community/affordable

workspace (Class E/F.1), provision of private and public amenity space, landscaping, tree and other planting, public realm improvements throughout the site including new pedestrian and cycle links, provision of public art and play space, basement level excavation to provide associated plant, servicing and disabled car and cycle parking, connecting through to the basement of the neighbouring West End Gate development."

The proposed land uses would comprise the following:

- 556 homes, including 210 affordable housing units (Class C3);
- 4,762 m² gross internal area (GIA) office floorspace (Class E);
- 1,088 m² GIA flexible community/affordable workspace (Class E/F1);
- 328 m² GIA affordable workspace ((Use Class E/F.1);
- Servicing, disabled parking and cycle parking at basement level; and
- Connection to the West End Gate (WEG) basement and energy centre with combined heat and power (CHP) plant.

The proposed building heights would be as follows:

- Block I – ground plus 17 storeys (18 storeys in total);
- Block J - ground plus 14 storeys (15 storeys in total); and
- Block K - ground plus 31 storeys (32 storeys in total).

The proposed development would be car free with the exception of minimal disabled parking provision. The proposed basement would be over two levels (B1 and B2), with B1 comprising an extension of the existing basement level and B2 comprising a deeper level, but over all small footprint.

The existing six trees on-site would be retained. In addition, the following landscaping is proposed:

- Residents roof garden with raised planters, multi-stem trees and mixed shrub and perennial planting at Block K level 25 (approximately 214 m²);
- Biodiverse roof garden with open-mosaic type habitat at the visual amenity space of Block K (approximately 170 m²);
- Residents roof garden with raised planters, multi-stem trees and mixed shrub and perennial planting at Block J roof level (approximately 621 m²);
- Ground level landscaping including; lawns, bulbs, rain gardens and planters (approximately 730 m²).
- Native hedgerow (50 m); and
- 121 new trees.

The proposed development would be car free with the exception of minimal disabled parking provision. The proposed basement would be over two levels (B1 and B2), with B1 comprising an extension of the existing basement level and B2 comprising a deeper level, but over a small footprint (see Appendix 1). **It has been assumed that the formation level would be approximately 7- 10 m below existing ground level.**

The existing six trees on-site would be retained. In addition, the following landscaping is proposed:

1.5 General Limitations and Reliance

This report has been prepared by Ramboll exclusively for the intended use by the Applicant in accordance with the agreement between Ramboll and the Applicant defining, among others, the purpose, the scope and the terms and conditions for the services. No other warranty, expressed or implied, is made as to the professional advice included in this report or in respect of any matters outside the agreed scope of the services or the purpose for which the report and the associated agreed scope were intended or any other services provided by Ramboll.

In preparation of the report and performance of any other services, Ramboll has relied upon publicly available information, information provided by the Applicant and information provided by third parties. Accordingly, the conclusions in this report are valid only to the extent that the information provided to Ramboll was accurate, complete and available to Ramboll within the reporting schedule.

Unless otherwise stated in this report, the scope of services, assessment and conclusions made assume that the site would continue to be used for its current purpose and end-use without significant changes either on-site or off-site.

Ramboll's scope of services for this assignment did not include collecting samples of any environmental media. Ramboll cannot rule out the existence of conditions, including, but not limited to, contamination not identified and defined by the data and information available to and/or obtained by Ramboll. Specifically, this assessment must not be considered as an asbestos survey (whether in built structures, waste, soils, etc.), even though the subject of asbestos-containing materials may have been discussed in the report.

2. SITE OBSERVATIONS

The following information was derived from a site visit undertaken on 17 September 2020 by Jessica Gregory of Ramboll UK Limited (Ramboll). Discussions were held with Ali Ahmed (Project Manager, Berkeley Group) and a site tour was provided by one of the members of the full-time security team. The purpose of the site visit was to assess whether there is potential for contamination from current activities. Internal access was restricted and, Ramboll's visit was limited to external areas of the site, the basement and some of the vacant rooms on the ground, first and second floors.

Figures showing the location of the site, site boundary and key features are presented in Appendix 1. Photographs taken during the site visit are presented in Appendix 3.

2.1 Site Setting

The site is located at 2-4 Harrow Road, Paddington, London W2 1XJ to the immediate north of the A40 Westway, at National Grid Reference 526920, 181740. Vehicle access to the site is currently via Newcastle Place.

The site is located in an area of mixed-use including residential uses to the north, east, north-west and north-east and public open space in the form of Paddington Green to the west. Edgware Road is dominated by small scale commercial development including a street market. The Paddington Basin is located to the south, comprising larger scale mixed-uses including hotels, the Saint Mary's Hospital, offices and residential uses. Westminster College Paddington Green campus is located to the north-west of the site and Edgware Road London Underground Station is located approximately 50 m to the east of the site.

Adjacent and surrounding land uses are summarised in Table 2.1.

Direction	Distance	Occupant	Activities	Notes
North	Adjacent	Berkeley Homes	West End Gate development (ref: 16/12162/FULL under construction to be completed 2025)	Residential development construction site
South	Adjacent	N/A	Harrow Road and the A40 road	N/A
East	Adjacent	N/A	Edgware Road	N/A
West	Adjacent	N/A	Paddington Green road and open space	Public green space
North-West	Adjacent	N/A	14-17 Paddington Green (PG) development site	Demolished and part of WEG construction site.

2.2 Site Layout and Activities

The site is approximately triangular, covering a total site area of 0.83ha.

The site is currently occupied by Newcastle Place (roadway) and Paddington Green Police Station, which has been in this location since the 1970s.

The site was acquired by the Applicant in 2020 following the vacation of the site by the Metropolitan Police as part of their London wide estate and disposals strategy. In this regard the neighbourhood policing function has been relocated to a new facility on Church Street. The site is currently predominantly vacant, aside from the Annex building on the western end of the site

which is in lawful use as offices. However, at the time of the site visit undertaken for this assessment, the site was fully vacant.

Approximately 30 % of the site is currently occupied by building cover; the remainder is occupied by concrete and asphalt hardstanding comprising a car parking/courtyard area while a single level of basement runs under the Police Station. Newcastle Place is present in the north of the site, providing both pedestrian and vehicular access between Paddington Green to the west and Edgware Road to the east of the site.

The site consists of the following:

- A single, interconnected building, albeit with a number of different, interrelated built forms, with hardstanding. This includes the 17 storey accommodation/section house on the eastern side of the site, a main office and police front of house 3-storey building below this on the eastern side of the site, and an 8 storey annex at the western side of the site, connected by a single storey building that previously housed high security cells;
- A single level of basement and a surface level podium car park to the rear, both accessed from Newcastle Place;
- Newcastle Place;
- An electricity substation in the north-eastern corner; and
- Six existing trees.

The remaining areas of the site are formed of concrete, tarmac, cobble and paved hardstanding.

In addition to the electricity substation, a review of historical building plans indicates that a plant room for oil fuel heaters is located in the eastern extent of the basement (this area could not be accessed at the time of the site inspection). However, the associated external fill point was observed.

The ground surface of the site is generally level, ranging from between approximately 31 m and 32 m above ordinance datum (AOD). The car park/courtyard area is raised by approximately 1 m above Newcastle Place and, is access via two ramps located in the east and the west of the site. The basement car park is accessed via a ramp located in the east of the site. The site layout is presented in Figure 2.

At the time of Ramboll's site inspection, part of the basement was temporarily being used for material storage and vehicle parking for the adjacent WEG development.

Ramboll's visit was limited to external areas of the site, the basement and some of the vacant rooms on the ground, first and second floors. Internal access was restricted due to the presence of asbestos containing materials (ACMs).

No Environmental Permits are held by the site.

2.3 Storage of Chemicals and Hazardous Substances

2.3.1 Underground Storage Tanks (USTs)

Site personnel were not aware of the current or former presence of USTs at the site and no visual evidence of USTs, such as fill points, pumps, gauges, or signage, markings or concrete scarring indicative of such potential uses was identified during the visit. (Historic evidence of USTs is provided in Section 3).

2.3.2 Above Ground Storage Tanks (ASTs)

Site personnel were not aware of the current or former presence of ASTs at the site; however, Ramboll observed a fill point (labelled 35 sec oil) in the east of the site, adjacent to a roller shutter door. Based on a review of historical building plans, Ramboll understands that a plant room for oil fuel heaters is located in the eastern extent of the basement (this area could not be accessed at the time of the site inspection). An asbestos report for the site (see below for further details) indicates that a second oil tank is located on the ground floor of the building (room G.66) – this was not accessible to Ramboll during the site inspection.

A 'silencer' and associated generator was observed on the flat roof of the elongated low-rise structure connecting the eastern and western towers. Site personnel were unable to confirm the age of the generator; however, it was reported that the generator and the associated integrated fuel tank were out of use. No leaks or spills were observed within the vicinity of the generator.

The site is served by five or six lifts; site personnel reported that the associated lift motor rooms are located on the top floor of each tower. The lift motor rooms were not accessible at the time of the site inspection; however, it is considered likely that the lift motors may contain small hydraulic oil reservoirs. No spill or leak events were reported.

2.3.3 Other Bulk Storage

At the time of Ramboll's site inspection the site was vacant, as such, site personnel reported that no hazardous substances were being stored at the site. Part of the basement was being temporarily used for material storage and vehicle parking associated with the adjacent WEG development construction site.

2.4 Water, Wastewater and Drainage

A drainage drawing for the site was not available for review by Ramboll during the site visit. Ramboll understands that the site is provided with mains drainage to the municipal foul sewer system. No oil-water interceptors were reported to be present on-site or identified on-site by Ramboll during the site visit; however, their presence or absence cannot be confirmed without review of comprehensive drainage drawings.

Site personnel had no knowledge of any legionella management exercise or whether a legionella risk assessment has been carried out.

Under the Health and Safety at Work Act 1974 and subsequent regulations, the dutyholder is required to assess the risk of Legionella exposure and put in place any necessary measures. The dutyholder may be the employer, or a person in control of the premises.

No current issues in relation to flooding were reported by the site contacts during the site visit.

2.5 Waste Storage and Disposal

With the exception of a full-time security presence the site was vacant at the time of the inspection. Therefore, wastes generated on-site predominantly comprise small quantities of domestic waste and recyclables. Waste are stored in one of two wheeled bins located in the west of the car park.

No visual evidence of staining or leaching from waste storage areas onto unsurfaced ground was noted. A review of waste documentation was outside the scope of this review.

2.6 Deleterious Materials

2.6.1 Asbestos Containing Materials

Given the age of the buildings (1970s), it is considered likely that asbestos containing materials (ACMs) were used during construction. An asbestos demolition survey report¹ for the site was provided for review after the site inspection. A total of four 'medium risk' materials were identified by Eton Environmental Group Ltd. (Eton), and 290 'low' to 'very low' risk materials were reported to be present. Eton reportedly collected 198 samples during the demolition survey, 118 of which were confirmed to contain asbestos upon analysis. In total 174 assessments of strongly presumed asbestos were also made by Eton. The report recommended that all ACMs be removed from the site prior to demolition in compliance with the Control of Asbestos Regulations 2012.

Much of the internal floor space was inaccessible to Ramboll during the site inspection due to the known presence of damaged ACMs. Numerous materials labelled as containing asbestos were identified during the site visit.

The site contacts were unaware of any asbestos removal or management works having been undertaken.

Under the Control of Asbestos Regulations (2012), the dutyholder must manage the risk from asbestos on a premises and to develop and implement an ACM management plan, with review and updating as appropriate. The dutyholder is the party who has, by virtue of contract or tenancy, the main responsibility for maintenance or repair of the building.

An asbestos survey has not been undertaken by Ramboll as it is outside the scope of this assessment.

2.6.2 Refrigerant Gases

Site personnel reported that some of the disused office space was formally comfort cooled via electric air conditioning units. Ramboll understands that the associated air conditioning units are located on the tower roofs which could not be accessed at the time of the inspection. The refrigerant gas content of the units could not be confirmed therefore, the presence of R22 refrigerant gas cannot be ruled out.

Under the Fluorinated Greenhouse Gases (F-gas) Regulations 2015 (SI 2015/310) and Ozone-Depleting Substances (ODS) Regulations 2015 (SI 2015/168), ODS are to be phased out and must be recovered during servicing, maintenance and decommissioning. F-gas systems require leak testing and good record keeping. It is good practice to make sure that all equipment containing refrigerant gases is labelled with the type and amount of gas contained.

The responsibility for compliance with legislation regarding refrigerant gases would be expected to rest with the tenant as user/operator. Refrigerant gases are not generally considered to pose a ground contamination risk.

2.6.3 Polychlorinated Biphenyls (PCB)

An electricity substation which is reportedly operated by UK Power Networks is located in the north-eastern corner of the site, to the south of Newcastle Place. Responsibility for PCB oils (if present) would be expected to lie with the operator.

¹ Eton Environmental Group Ltd., Demolition Survey for Asbestos Containing Materials, Paddington Green Police Station, Job No. J041886, dated April 2020

Under the Polychlorinated Biphenyls Regulations 2000, the holder of equipment that contains PCBs must ensure it is decontaminated to less than 0.05 % unless within an electrical transformer, which requires annual registration with the regulatory authorities.

As discussed above, the site is served by five or six lifts and, site personnel reported that the associated lift motor rooms are located on the top floor of each tower. The lift motor rooms were not accessible at the time of the site inspection; however, it is considered likely that the lift motors may contain small hydraulic oil reservoirs which may contain PCB- containing oils. No other potential PCB-containing equipment was identified during the site visit.

2.7 Air Emissions

No significant emissions to air were noted. Site personnel reported that the building was formally heated by gas powered boilers and comfort cooled via air conditioning units. Three air extraction/circulation units were observed in the basement; site personnel reported that these are now redundant. A moderate to strong hydrocarbon odour was observed by Ramboll in the east of the basement car park; Ramboll was unable to determine the source of the odour.

2.8 Other Issues

According to the site contacts, there is no known history of complaints, enforcements or other regulatory actions regarding the site or immediate surrounding properties related to environmental conditions. No fire or spill events were reported. No flooding of the site is known to have occurred historically, according to site contacts.

Facility personnel were not aware of any environmental ground investigations or monitoring having taken place on the site; however, Ramboll observed two borehole covers in the basement.

No invasive species were reported to be present on-site by the site contacts.

2.9 Potential for Ground Contamination from Current Uses

2.9.1 Potential On-site Contamination Sources

The site is currently occupied by Newcastle Place and Paddington Green Police Station, which has been in this location since the 1970s. Ramboll understands that the site is served by at least two oil tanks located within the basement and on the ground floor, neither of which were accessible at the time of the inspection. The site is also served by at least one generator and a number of lift motor rooms. Site personnel reported that all on-site plant is currently out of use. A moderate to strong hydrocarbon odour was observed by Ramboll in the east of the basement car park; Ramboll was unable to determine the source of the odour. Asbestos containing materials are known to be present throughout the on-site buildings.

2.9.2 Potential Off-site Contamination Sources

The site is located within a predominantly commercial and residential area including the WEG development to the north and Edgware Road to the east. No significant potential offsite contamination sources were identified during the site inspection.

3. HISTORICAL AND REGULATORY INFORMATION

3.1 Map History

Ramboll has undertaken a review of historical mapping and aerial imagery (where available) obtained from a proprietary environmental database which is summarised in this section. Selected historical maps are presented in Appendix 2.

3.1.1 Site

From at least the late 1860s the entire site was occupied by multiple connected buildings of likely residential and commercial use. The site was still occupied by multiple buildings by the mid-1910s, albeit in a different configuration, and one of the buildings in the south-east of the site was labelled as a Metropolitan Theatre of Varieties. Historical building plans dated 1942 showed that other occupied buildings included showrooms in the west of the site, a timber store in the centre of the site, a smithy, wood working workshop, slaughterhouse and garage (likely for vehicle maintenance) in the north of the site, and the Metropolitan Music Hall in the east. Part of a garage was present in the north of the site, extending off-site to the north. As part of the garage a sunk petrol tank is labelled within the northern site boundary, which is later labelled as 'disused' in the historical building drawing dated 1963.

Historical building drawings dated 1960 showed the timber store, smithy, wood working workshop and slaughterhouse were no longer present, and a car park was present in the north and centre of the site. At this date the centre and eastern portions of the site had been cleared of buildings, and historical building plans dated 1967 showed the site had been cleared and was being used as a coach park.

By the early 1970s a building had been developed on the site (approximately 30% of the total site area) labelled as Police Station and Section House (the current site configuration). Historical building drawings dated 1970 show the configuration of the police station at this time, which included a car wash area towards the north and a plant room in the eastern part of the basement containing 'oil fuel heaters'. Aerial imagery published in 1999 showed the north of the site was occupied by external hardstanding used for car parking. No further significant changes were identified up to and including the map dated 2020.

3.1.2 Study Area

From at least the late 1860s the site has been located in a heavily built up area of Central London comprising a mixture of residential, commercial and light industrial uses. Maps dated 1915 showed that a tramway was located 10m south of the site, a garage was present 70 m north-west, a disused crane yard was labelled 130 m north-west, Paddington Station was 380 m south-west and Marylebone Station was 640 m north-east.

By the mid-1940s the tramway was no longer present, and historical building drawings dated 1942 show that a wood working workshop, garage and sawmill was present partially on-site and extending off-site to the north. The drawings show a sunk petrol tank (within the site boundary) forming part of the garage. Historical building plans dated 1970 show oil storage and paint spraying activities were also undertaken at the garage.

By the mid-1980s, light industrial sites within the surrounding area included a factory and works from 40m north-west, warehouses from 80 m south and garages from 200 m west, 240 m south-west, 260 m south-west and 280 m south. Land from 40m north (previously occupied by warehouses) was cleared by the early 2000s and Google Earth™ imagery from 2010 showed the garage to the north of the site was in the process of being demolished. The building was no

longer present by 2011 and the land was used for storage and parking of vehicles. Imagery from 2017 showed the former garage building and land to the north were occupied by a construction site, and by 2020 a high-rise building was under development.

No further significant changes were identified up to and including the map dated 2020.

3.2 Environmental Database Records

The information presented in Table 3.1 has been obtained from a review of a proprietary environmental database procured by Ramboll relating to the site and surrounding land.

Table 3.1: Summary of Key Environmental Database Information					
Data Type	On site	Within 250 m	Within 500 m	Within 1 km	Details of nearest relevant record within 250 m of site
Contaminated Land Register entries	0	0	0	0	None
Prosecutions or enforcement actions	0	0	0	0	None
Pollution incidents	0	0	1	6	None
Former landfill sites	0	0	0	0	None
Current landfill sites	0	0	0	0	None
Registered Waste Sites	0	2	2	1	Nearest (surrendered) license held by WCC 140 m SW, prohibited waste includes clinical, special wastes and waste N.O.S. Nearest (operational) licence held by Onyx UK Ltd 150 m SW, prohibited waste includes clinical, special wastes and waste N.O.S.
Part A(1) Environmental Permits	0	0	0	0	None
Part A(2) Environmental Permits	0	0	0	0	None
Part B Environmental Permits	1	1	4	14	On site: operated by Godfrey Davis London Limited for respraying of road vehicles. Application status is 'not yet authorised'; however, the permit is dated September 1992. Dry cleaning 180 m N operated by Brite. Application permitted.
Control of Major Accident Hazards Sites (COMAH)	0	0	0	0	None
Fuel Stations	0	0	2	4	None
Contemporary trade directory entries	0	51	134	360	Nearest active is Powergold Technology 80 m N for electrical goods sales, manufacturers and wholesalers. Others active within 250 m include car body repairs, decorating supplies, garage services, fabricated metal

Table 3.1: Summary of Key Environmental Database Information					
Data Type	On site	Within 250 m	Within 500 m	Within 1 km	Details of nearest relevant record within 250 m of site
					products and toy manufacturers.
Registered Radioactive Substances	0	0	24	4	Information on certain radioactive substance authorisations is not publicly accessible
EA discharge consents	0	0	1	13	None
Radon affected area	N	N/A	N/A	N/A	None

The LinesearchbeforeUdig database, which lists pipelines distributing crude oil and refined hydrocarbon products owned and/or operated by a number of UK pipeline operators indicates that there are records of underground oil or refined hydrocarbon product pipelines on the site or within 250 m operated by Fulcrum Pipelines.

Transport for London's Property Asset identifies the south-east of the site as lying within the zone of influence for the London Underground (Bakerloo Line).

3.3 Regulatory Authority Enquiries

3.3.1 Local Authority Environmental Health Department

The Environmental Health Department of WCC has provided the following information:

- In Westminster, there are no Special Sites registered under the Environmental Protection Act 1990 78R-T, and none where notices have been served under Part IIA Section 78. As yet, the Council has not produced a schedule of land that will require further assessment under Part IIA of the Environmental Protection Act 1990. Currently the Council's contaminated land inspection strategy is at the site prioritisation stage and they currently have no timescales on this.
- There are no known ground contamination issues associated with the site.
- The Council have no record of landfills within a 250 m radius of the site.
- The Council have no record of elevated indoor radon gas concentrations within buildings on site or within a 100 m radius of the site.
- There are three known private water supplies in Westminster and none of them are within 2 km of the site.

3.3.2 Local Authority Planning Department

Ramboll has obtained a planning history of the site from the Planning Department of WCC. Two relevant applications are summarised as follows (as set out in ES Chapter 1: Introductions):

- Ref. 20/02567/FULL: Use of the annex part of the site as an office (Class E). Application approved 11 December 2020.
- Ref. 20/02103/CLEUD: Mixed use comprising police station (*Sui Generis*), office (Class B1), residential institution (Class C2). Application withdrawn 07 September 2020. No further documents provided.

3.3.3 Petroleum Enforcement Authority

The Petroleum Enforcement Authority of London Fire Brigade have confirmed that they hold no record of petroleum storage tanks on the site.

3.4 Historical Potential for Ground Contamination

3.4.1 Site

Historically, the site was occupied by multiple units with the potential to cause contamination including part of a garage with a sunk petrol tank, a timber store, smithy, wood working workshop, slaughterhouse, garage and theatre, before the site was cleared and used as a coach park in the late 1960s. The Police Station on the site was developed in the early 1970s. WCC has stated that there are currently no contaminated land sites in the jurisdiction; however, potential contamination arising from historical site uses cannot be discounted. The WCC planning portal does not hold records of environmental investigations being undertaken at the site.

3.4.2 The Surrounding Area

The immediate surrounds have historically included potentially contaminative light industrial uses including garages, workshops, warehouses, factories and a sawmill. A tramway was historically within 10 m of the site to the south, and historical building plans from the mid-1950s to 1970 show a garage (partially on-site) extended off-site to the north undertaking oil storage and paint spraying facilities.

4. ENVIRONMENTAL SETTING

Desk-based research of the local geology, hydrogeology and hydrology was carried out in order to establish the potential for migration of contamination onto or away from the site, and to assess the sensitivity and vulnerability of the site's setting with respect to surface water, groundwater and ecological resources.

Information was obtained from the following sources:

- Published geological maps produced by the British Geological Survey (BGS) and associated sheet memoirs (where available);
- Publicly available BGS borehole logs for the site or within 10 m of the boundary
- A proprietary environmental database procured by Ramboll; and
- Regulatory Authority websites including the Environment Agency (EA).

4.1 Geology and Hydrogeology

According to BGS 1:50,000 mapping of the area and available BGS borehole logs, the site geology and hydrogeology is presented in Table 4.1.

Table 4.1: Summary of Geology and Hydrogeology				
Formation	Description	Thickness	EA Aquifer Designation	Hydrogeological Significance
Made Ground is anticipated on-site (consistent with a nearby borehole log described below).				
Langley Silt Member	Clay and Silt	Up to 5 m thick	Unproductive Strata	Low permeability formations with negligible significance for water supply.
London Clay Formation	Clay, silt and sand	Up to 150 m thick	Unproductive Strata	Low permeability formations with negligible significance for water supply.
Lambeth Group	Clay, silt, sand, gravel, minor limestones and lignites with occasional sandstone	Up to 39 m thick	Secondary A Aquifer	Permeable formations with potential to support localised abstractions.
Upper Chalk Formation	Chalk	Up to 60 m thick	Principal Aquifer	Highly permeable, with significant water storage. Able to support large abstractions.

The BGS hold records of two boreholes drilled approximately 10 m south of the site in July 1963 relating to road improvements. The following ground conditions were encountered:

- 0.15 m of concrete underlain by rubble and soft clay to 0.4 m below ground level (bgl);
- Stiff brown sandy clay with fine and medium gravel to 1.0 mbgl;
- Stiff brown sandy clay to 3.2 mbgl;
- Medium dense clayey fine to medium sand with occasional pockets of firm brown sandy clay to 6.8 mbgl;
- Dense fine to medium gravel and brown medium sand to 8.8 mbgl;
- Stiff brown clay to 9.1 mbgl; and
- Stiff fissured dark grey silty clay to 15.2 mbgl (end of borehole).

No groundwater was reportedly encountered during drilling.

Historic² and recent³ ground investigations undertaken at the adjacent WEG development indicate the following ground stratigraphy at the site:

- Rubbly Made Ground (typically 1-2 m thickness);
- Langley Silt Member (clays, silts and sands, typically 2-3 m thickness);
- Lynch Hill Gravels (gravelly sands and flint gravel with uppermost 1-2 m thick layer of laminated clay, typically 6 m thickness in total); and
- London Clay (silty clay typically from 12 m below ground level (mbgl) to depth (anticipated approximately 50 mbgl).

Note that Lynch Hill Gravels were found and may also be present on the site.

Groundwater is not classified at the site and surrounding area by the EA under the Water Framework Directive classification scheme, likely due to the unproductive nature of the London Clay Formation.

According to EA information provided by a commercial environmental regulatory database provider, there are 28 licensed groundwater abstractions within a 2 km radius of the site. Of these, 10 are within 1 km, as detailed in Table 4.2. There are no abstractions for public potable water supply within 2 km.

Table 4.2: Licensed Groundwater Abstractions within 2 km of Site			
Licence Holder	Distance from Site	Abstraction source	Purpose of Abstraction
Derwent Valley London Limited	340 m W	Not specified	Other Industrial/Commercial/Public Services: Heat Pump.
Land Securities Properties Limited	580 m SW	Not specified	Commercial/Industrial/Public Services: Drinking; Cooking; Sanitary; Washing (Small Garden).
CSHV IUK ET Propco Limited	590 m SW	Not specified	Other Industrial/Commercial/Public Services: Heat Pump.
Britel Fund Trustees Limited	610 m SW	Not specified	Other Industrial/Commercial/Public Services: Non-Evaporative Cooling.
Britel Fund Trustees Limited	640 m SW	Not specified	Other Industrial/Commercial/Public Services: Non-Evaporative Cooling.
Accor UK Business & Leisure Hotels Limited	730 m W	Not specified	Hotels, Public Houses and Conference Centres: Heat Pump.
Dorset House Residential Limited	850 m E	Not specified	Household Water Supply: Drinking; Cooking; Sanitary; Washing (Small Garden).
Abbey National Plc	880 m E	Not specified	Commercial/Industrial/Public Services: Drinking; Cooking; Sanitary; Washing (Small Garden.)
Baskerville Estates (GP) Limited	930 m E	Not Specified	Commercial/Industrial/Public Services: Drinking; Cooking; Sanitary; Washing (Small Garden).

² Soil Mechanics 1995

³ LEAP Environmental 2015

Table 4.2: Licensed Groundwater Abstractions within 2 km of Site			
Licence Holder	Distance from Site	Abstraction source	Purpose of Abstraction
Wood Management Trustees Ltd	950 m NE	Not specified	Household Water Supply: Drinking; Cooking; Sanitary; Washing (Small Garden).

The site is not situated within an EA designated groundwater Source Protection Zone.

4.2 Coal Mining

According to the Coal Authority, the site is not located in a Coal Mining Affected Area. The BGS has stated that the site is located in an area where other (non-coal) mining activities are "No Hazard".

4.3 Hydrology

The nearest identified surface water body is the Paddington Basin approximately 150 m south, connecting to the Grand Union Canal and Regents Canal at the junction of Little Venice 750 m north-west of the site. The EA has not classified these watercourses under the Water Framework Directive classification scheme.

According to an independent, third party environmental database, there are two licensed surface water abstractions within a 2km radius of the site, as detailed in Table 4.3.

Table 4.3: Licensed Surface Water Abstractions within 2 km of Site			
Licence Holder	Distance from Site	Abstraction source	Purpose of Abstraction
British Waterways	620 m N	Regents Canal	Industrial Cooling
Canal and River Trust	680 m N	Regents Canal	Amenity: Spray Irrigation - Direct

According to the EA fluvial and tidal flood map for planning, the site is located in Flood Zone 1 (Low Probability). This zone comprises land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1 % in any year). The closest area of land recorded as having an elevated risk of flooding is located approximately 220 m south-west of the site.

According to the EA Flood Map for Surface Water which presents the theoretical potential for flooding from pluvial sources (i.e. flooding caused by rainwater exceeding capacity of drainage systems), the site is located in an area of Very Low flooding probability. This zone comprises land assessed as having a less than 1 in 1,000 annual probability of pluvial flooding (<0.1% in any year).

4.4 Ecology

There are no statutory designated ecologically sensitive sites located within 1 km of the site. St Mary's Churchyard and Paddington Green Park Square Gardens Borough Grade II Site of Importance for Nature Conservation (SINC) is located immediately to the west of the site. An Ecology Impact Assessment accompanies the application.

4.5 Environmental Sensitivity and Vulnerability

The site is located within a low sensitivity setting with regard to groundwater resources. The site overlies an Unproductive Strata, is not located within a Groundwater Source Protection Zone and there are no groundwater abstractions for public water supply located within 2 km.

The site is located in a low sensitivity location with regard to surface water resources, as the Paddington Basin is situated approximately 150 m south of the site. There are two licensed surface water abstractions within 2 km.

There are no statutory designated ecologically sensitive areas within 1 km.

The site is located within the Paddington and Lillestone Village Area of Special Archaeological Priority (ASAP). This designation exists on the basis of the possibility for Saxon, Anglo-Saxon and Medieval remains. An Archaeological Desk Based Assessment accompanies the application.

The western half of Newcastle Place, is within the Paddington Green Conservation Area. A Heritage Statement, as well as a Townscape, Visual and Built Heritage Impact Assessment accompanies the application.

5. CONCEPTUAL SITE MODEL

5.1 Introduction

In the UK ground contamination is assessed by identifying whether a pollutant linkage is present (or potentially present) between a contaminant, a pathway and a receptor in the form of a Conceptual Site Model (CSM). The CSM takes into account the known information from the site, surroundings and the environmental setting and is a simplified representation of the possible environmental conditions at and in the vicinity of the site, and is used to initially identify potential sources, potentially sensitive receptors, pathways, and pollutant linkages.

The information provided in the preliminary CSM is based on the findings of the Phase 1 assessment of this report.

5.2 Potential Sources of Contamination

The potential sources of contamination identified from the desk study are summarised in Table 5.1.

Period	On-site	Off-site
Current	Made Ground on-site. This may include demolition materials, asbestos, and unknown contaminants from previous uses.	Made Ground used in construction of current buildings.
	Two above ground oil storage tanks located in the basement and ground floor. Condition of the tanks is unknown. No spills or leaks reported.	
	A moderate to strong hydrocarbon odour was observed by Ramboll in the east of the basement car park; Ramboll was unable to determine the source of the odour.	
	Asbestos containing materials are known to be present throughout the on-site buildings.	
Historic	Use as a timber store, smithy, wood working workshop, slaughterhouse and garage from the early 1940s until the late 1960s.	A tramway <10 m south and a garage 10 m north including a sunk petrol tank, oil storage and paint spraying facilities.

5.3 Receptors

The identified receptors are summarised in Table 5.2.

Receptor	Location	Rationale	Receptor Present
Humans	On-Site	The site is currently occupied by disused police station buildings with a basement level car park. At the time of Ramboll's site inspection, part of the basement was temporarily being used for material storage and vehicle parking associated with the adjacent WEG development. Future redevelopment is proposed to comprise approximately 556 homes; approximately 6,171 m ² GIA office, flexible commercial space, affordable workspace; and connection to the WEG basement and energy centre with combined heat and power plant. Receptors include elevated residential site users, commercial site users and construction workers.	Yes
	Off-Site	The site is located within a mixed commercial/residential setting.	Yes
Water Environment	On-Site	The underlying superficial deposits and natural bedrock are both classified as Unproductive Strata. Shallow groundwater underlying the site is not anticipated. Lynch Hill Gravels may be present, although not likely to be a viable potable water resource.	No
	Off-Site	Surface Water: the Paddington Basin is located 150 m south of the site. No sensitive surface water abstractions are located within 2 km of the site. Given the local geology and distance to surface water a significant risk of pollution from ground contamination is not anticipated.	No
Ecological Receptors	On-Site	There are no statutorily designated ecological receptors identified on-site.	No
	Off-Site	There are no statutorily designated ecological receptors identified within 1km of the site.	No
Built Environment	On-Site	The site is proposed to be re-developed in future for a residential-led scheme with residential units.	Yes

5.4 Potential Pathways

The identified potential pathways for contamination are summarised in Table 5.3.

Pathway	Discussion	Pathway present
Direct Physical Contact, Ingestion and Inhalation	Direct contact with, ingestion, and dust and particulate inhalation pathways are considered unlikely for future site users, as extensive hardstanding and building cover across most of the future development break the pathway from these contaminants to site users. Future site users would be considered receptors to these pathways in exposed soft landscaped areas only. There is a potential pathway between contamination in soil and construction workers.	Yes, once site developed - in soft ground level landscaping areas only. Yes
Contaminant volatilisation into indoor and outdoor airspace	There is a potential pathway from volatile contaminant migration/soil gas migration to indoor and outdoor air.	Yes
Migration from soils to groundwater via leaching	Shallow groundwater is not expected beneath the site due to the underlying Unproductive Strata.	No
Migration within groundwater vertically and laterally to deeper groundwater, and to surface watercourses	The site is underlain by a Unproductive Strata and shallow groundwater is not expected beneath the site. Migration of potential contaminants (if present) is not anticipated.	No
Migration of volatile contaminants via service lines	There is a potential pathway through permeable gravels used to surround service lines.	Yes
Volatilisation of contaminants from groundwater to human receptors	Shallow groundwater is not anticipated to be present beneath the site.	No
Migration of potentially hazardous ground gases	There is a potential for ground gas ingress from the site into future commercial and residential buildings.	Yes

5.5 Preliminary Conceptual Site Model

The potential contaminant sources, pathways and receptors have been combined into potential pollutant linkages (PL) that are detailed in the CSM in Tables 5.4 and 5.5. A Pollutant Linkage is where there is a full connection between a contaminant, pathway and receptor.

Receptor Type	Location	Description of Pollutant Linkage	Pollutant Linkage
Humans	On-site	Dermal contact, inhalation and ingestion of contaminated soils by residential and commercial site users in ground level landscaped areas.	PL1
	On-site	Contaminant volatilisation into indoor and outdoor airspaces and inhalation by residential and commercial site users.	PL2

Receptor Type	Location	Description of Pollutant Linkage	Pollutant Linkage
Built Environment	On-Site	Migration of potentially hazardous ground gases into on-site buildings.	PL3

Receptor Type	Location	Description of Pollutant Linkage	Pollutant Linkage
Humans	On-site	Dermal contact, inhalation and ingestion of contaminated soils by construction workers.	PL1
	On-site	Contaminant volatilisation and dust into indoor and outdoor airspaces and inhalation by construction workers.	PL2
Built Environment	On-Site	Migration of potentially hazardous ground gases into on-site buildings.	PL3

6. CONCLUSIONS

The site is currently occupied by Paddington Green Police Station, which has been in this location since the 1970s, as well as Newcastle Place. The former police station was vacant at the time of the inspection. However, part of the site is currently in use as offices (the western annex building).

Approximately 30 % of the site is currently occupied by building cover, the remainder of the site is occupied by concrete and asphalt hardstanding comprising a car parking/courtyard area. A basement underlays the Police Station. Newcastle Place is present in the north of the site, providing both pedestrian and vehicular access between Paddington Green to the west and Edgware Road to the east of the site.

The site is served by at least two oil tanks located within the basement and on the ground floor, neither of which were accessible at the time of the inspection. The site is also served by at least one generator and a number of lift motor rooms. Site personnel reported that all on-site plant is currently out of use. A moderate to strong hydrocarbon odour was observed by Ramboll in the east of the basement car park; Ramboll was unable to determine the source of the odour. Asbestos containing materials are known to be present throughout the on-site buildings.

The site was historically occupied by multiple units with the potential to cause contamination including part of a garage with a sunk petrol tank, a timber store, smithy, wood working workshop, slaughterhouse, garage and theatre, before the site was cleared and used as a coach park in the late 1960s. The current Police Station was developed in the early 1970s. Potential historic ground contaminants could include oils and fuels, asbestos fibres, metals, volatile organic compounds and other hydrocarbon compounds. Made Ground/fill of unknown composition is likely to be present at the site from the construction of the current site buildings.

The immediate surrounds have historically included potentially contaminative light industrial uses including garages, workshops, warehouses, factories and a sawmill. A tramway was historically within 10 m of the site to the south, and historical building plans from the mid-1950s to 1970 show a garage (partially on-site) extended off-site to the north undertaking oil storage and paint spraying facilities. WCC has stated that in the City of Westminster there are currently no contaminated land sites or 'Special Sites' as they are known under the Environmental Protection Act 1990 within their jurisdiction, and the Environmental Health Department has stated that there are no known ground contamination issues associated with the site.

The site is located within a low sensitivity location with regard to groundwater resources. Both the superficial deposits and natural bedrock underlying the site and immediate surrounding area are classified as Unproductive Strata, and the site is not located within a Groundwater Source Protection Zone. There are no groundwater abstractions for public potable water supply within 2 km of the site.

The site is located within a low sensitivity location with regard to surface water resources. The nearest surface watercourse is the Paddington Basin approximately 150 m south, connecting to the Grand Union Canal and Regents Canal at the junction of Little Venice 750 m north-west of the site.

There are no statutory designated ecologically sensitive sites located within 1 km of the site. St Mary's Churchyard and Paddington Green Park Square Gardens Borough Grade II Site of Importance for Nature Conservation (SINC) is located immediately to the west of the site. An Ecology Impact Assessment accompanies the application.

The site is located within Flood Zone 1 (Low Probability).

The site is located within the Watling Street Tier II APA and the Paddington Tier II APA. An Archaeological Desk Based Assessment accompanies the application.

Part of Newcastle Place, is located within the Paddington Green Conservation Area. A Heritage Statement, as well as a Townscape, Visual and Built Heritage Impact Assessment accompanies the application.

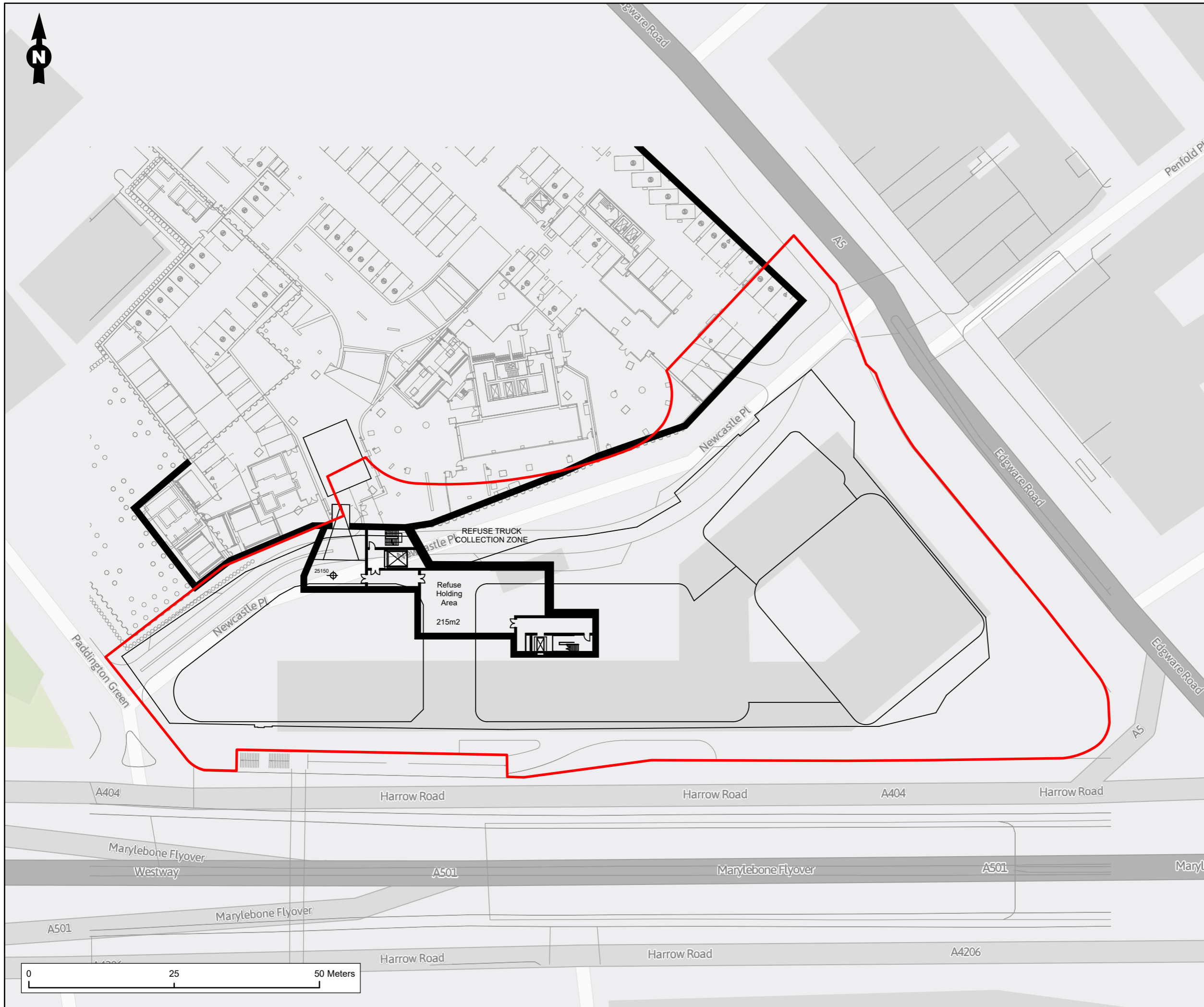
Potential pollutant linkages associated with the history of the site include risks to human health from dermal contact, inhalation and ingestion of contaminated soils and risks from vapours or ground gases migrating into new buildings. Future building cover and clean soils in landscaping would mitigate some potential pollutant linkages (i.e. providing a barrier to the soil). As is standard for a brownfield site redevelopment, potential risks would be assessed through a site investigation and risk assessment.

The investigation and risk assessment would be undertaken at an appropriate point before redevelopment work starts on-site. Remediation works cannot be completely ruled out until the investigation and risk assessment have been undertaken; however, given that the basement excavation would remove potentially contaminated soil, the requirement for extensive remediation is considered unlikely.

Development works would also consider the potential for contamination to be present and how this is managed. For example, this could include health and safety of workers, piling risk assessment, Sustainable Drainage System (SuDS) assessment, appropriate classification of contaminated soils and potential for asbestos and other contaminants to be present. Hazardous materials in buildings, such as oil tanks and asbestos, would also be considered and measures taken to prevent pollution during demolition and construction.

On the basis of the above, significant adverse environmental effects are considered unlikely. Site Investigation Works and associated remediation and validation works (if necessary) would be secured by means of an appropriately worded planning condition.

APPENDIX 1
FIGURES



Legend

Site Boundary

Figure Title
Proposed Basement: Level -2

Project Name
Paddington Green Police Station

Project Number 1620009008	Figure No. 1
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Date March 2021	Prepared By AB
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Scale 1:625 @A3	Issue 1
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Client
**Berkeley Homes
(Central London) Ltd**





Legend

 Site Boundary

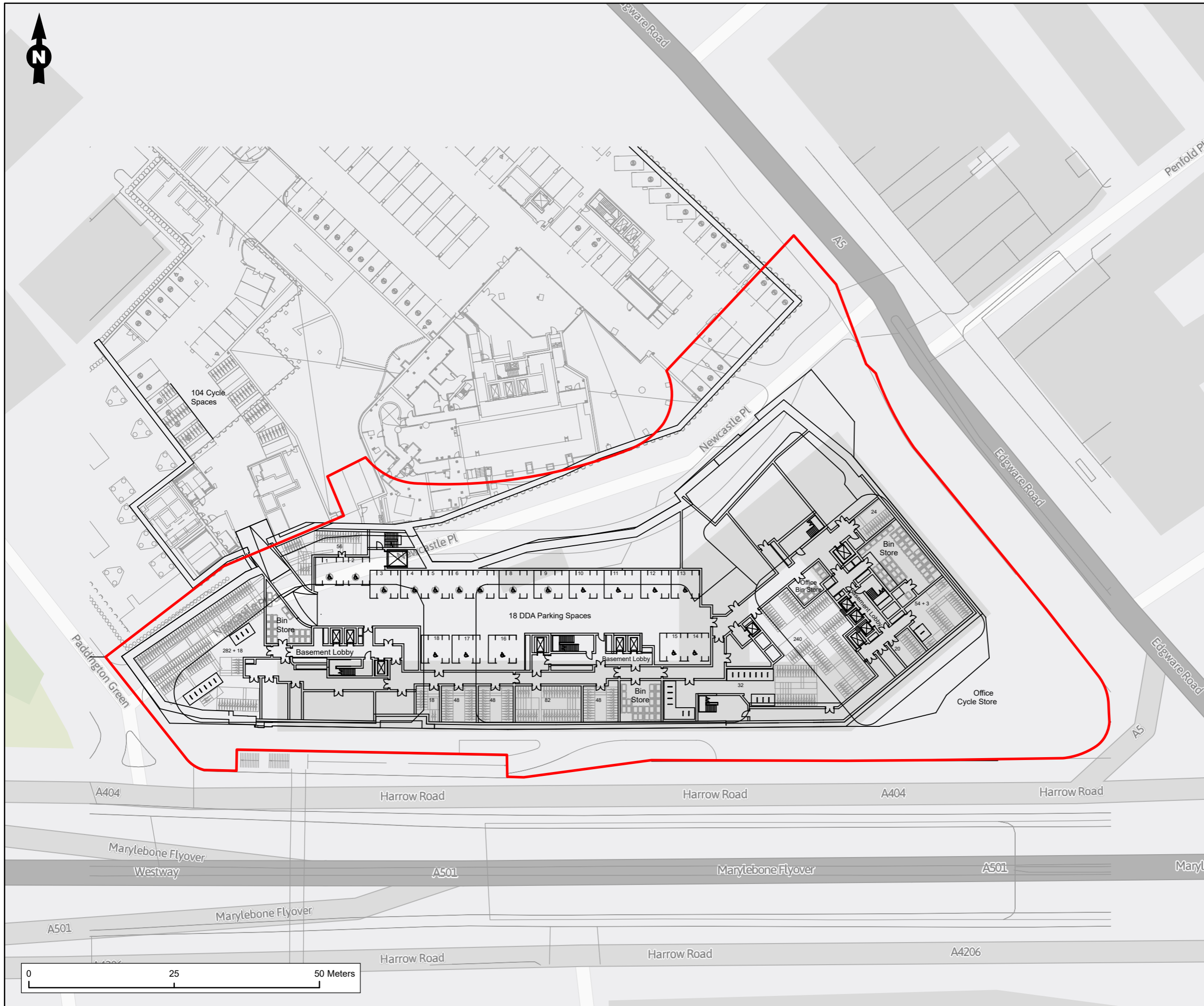


Figure Title
Proposed Basement: Level -1

Project Name
Paddington Green Police Station

Project Number 1620009008	Figure No. 2
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Date March 2021	Prepared By AB
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Scale 1:625 @A3	Issue 1
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Client
**Berkeley Homes
(Central London) Ltd**

