

## **Technical Appendix 2.2: Avison Young EIA Scoping Independent Review**

## Briefing Note

### Paddington Green Police Station, City of Westminster

## Environmental Impact Assessment (EIA) Scoping Opinion Advice

### 1. The EIA Scoping Process To-Date

- 1.1 Avison Young are appointed by Westminster City Council (WCC) as independent EIA advisors in respect of the redevelopment of the Paddington Green Police Station (the Proposed Development). A detailed planning application for the Proposed Development is scheduled for submission in late spring / early summer 2021.
- 1.2 In September 2020, pursuant to Regulation 15 of the Town and Country Planning (England and Wales) Regulations, 2017 (as amended) (the EIA Regulations), the Applicant for the Proposed Development submitted a request for an EIA Scoping Opinion to WCC. This comprised a report prepared by the Applicant's Lead EIA Consultant, Ramboll (the 'Ramboll EIA Scoping Report') setting out the intended scope and content of the forthcoming Environmental Statement (ES). The Ramboll EIA Scoping Report is included within **Appendix I**.
- 1.3 The Ramboll EIA Scoping Report was critically reviewed by Avison Young. The findings of the review were reported in a document entitled 'Independent Review of the Environmental Impact Assessment (EIA) Scoping Request' dated 9<sup>th</sup> November 2020 (the 'Avison Young Independent Review Report'). The Avison Young Independent Review Report is included within **Appendix II**. In summary, although Avison Young broadly agreed with much of the intended scope of the ES, the Avison Young Independent Review Report noted that additional information and clarification was required to make a robust evaluation of the proposed scope of the forthcoming ES. Accordingly, under Part 4, Paragraph 15 (3) of the EIA Regulations, additional information and clarification from the Applicant was requested prior to adopting an EIA Scoping Opinion.
- 1.4 To facilitate a collaborative approach, the Avison Young Independent Review Report was issued to Ramboll for consideration, thereby providing an opportunity for additional information and / or clarification to be provided in respect of the findings of the Avison Young Independent Review Report. Additional information and various clarifications were submitted in by Ramboll to Avison Young on 15<sup>th</sup> December 2020 (the 'First Ramboll Response'). This is included within **Appendix III**.
- 1.5 Following a review of the First Ramboll Response, a meeting between Avison Young and Ramboll was held on 13<sup>th</sup> January 2021. This meeting allowed for a useful and pro-active discussion on all matters, with Avison Young setting

out a few additional requests for clarification in respect of the First Ramboll Response. An email summarising the meeting was issued from Avison Young to Ramboll on 13<sup>th</sup> January 2021 (the '13<sup>th</sup> January 2021 Email'). The 13<sup>th</sup> January 2021 Email is included within **Appendix IV**.

- 1.6 Ramboll's response to the 13<sup>th</sup> January 2021 Email was received on the 2<sup>nd</sup> February 2021 (the 'Second Ramboll Response'). This is included within **Appendix V**.
- 1.7 Careful consideration of the Ramboll EIA Scoping Report (refer to **Appendix I**), the Avison Young Independent Review Report (refer to **Appendix II**), the First Ramboll Response (refer to **Appendix III**), discussions held on the 13<sup>th</sup> January 2021, the 13<sup>th</sup> January 2021 Email (refer to **Appendix IV**), the Second Ramboll Response (refer to **Appendix V**), and consultation with statutory consultees should now allow WCC to formulate an EIA Scoping Opinion.

### 2. Purpose of this Briefing Note

- 2.1 Having considered all Reports, meetings and outputs described above, this Briefing Note sets out Avison Young's recommendations to WCC in respect of the scope of the forthcoming ES.

### 3. General Approach to the ES

- 3.1 The proposed general approach to the ES is considered appropriate with regard to:
  - Non-technical elements of the ES (that is, ES components that will describe the Proposed Development, describe the demolition and construction works, together with the implementation programme, the consideration of reasonable alternatives to the Proposed Development and the Non-Technical Summary (NTS)).
  - The broad approach to assigning significance criteria to determine the likely significance of environmental effects and residual environmental effects.
  - The definition of the relevant baseline conditions to be used within the various assessments to comprise the ES, giving due regard to the ongoing implantation of the adjacent West End Gate (WEG) scheme (planning reference 16/12162/FULL) and the 14 - 17 Paddington Green scheme (planning references 18/08004/FULL and 18/080110/LBC) as described within the First Ramboll Response (refer to **Appendix III**).
  - The selection of 'other schemes' to be included within the cumulative assessment, subject to the ongoing review of planning approvals which may be granted following the issuing of an EIA Scoping Opinion. In this regard, at the current time (and subject to the aforementioned ongoing review), it should be noted that the list of 'other schemes' to be included within the cumulative assessment should include those set out in the Ramboll EIA Scoping Report (refer to **Appendix I**) plus the two additional 'other schemes' set out in the Avison Young Independent Review Report (refer to **Appendix II**). This approach was acknowledged and agreed by Ramboll in the First Ramboll Response (refer to **Appendix III**).

## 4. Topics to be 'Scoped In' to the ES

4.1 In line with the Ramboll EIA Scoping Report (refer to **Appendix I**), the Avison Young Independent Review Report (refer to **Appendix II**), the First Ramboll Response (refer to **Appendix III**), discussions held on the 13<sup>th</sup> January 2021, the 13<sup>th</sup> January 2021 Email (refer to **Appendix IV**), and the Second Ramboll Response (refer to **Appendix V**), it is considered appropriate to scope in the following topic areas to the ES:

- **Socio-economics** - The scope, methodology and proposed approach set out in the Ramboll EIA Scoping Report (refer to **Appendix I**) and subsequently clarified in the First Ramboll Response (refer to **Appendix III**) is considered appropriate.
- **Air quality** - The scope, methodology and proposed approach set out in the Ramboll EIA Scoping Report (refer to **Appendix I**) with was subsequently clarified in the First Ramboll Response (refer to **Appendix III**), and further clarified in the Second Ramboll Response (refer to **Appendix V**) is considered appropriate. For the avoidance of doubt and as clarified in the Second Ramboll Response (refer to **Appendix V**), it is confirmed appropriate for the proposed air quality assessment to omit an assessment of emissions arising from the West End Green (WEG) Energy Centre, of which the Proposed Development will 'plug into'.
- **Noise and vibration** - The scope, methodology and proposed approach set out in the Ramboll EIA Scoping Report (refer to **Appendix I**) and subsequently clarified in the First Ramboll Response (refer to **Appendix III**) is considered appropriate. For the avoidance of doubt and as clarified in the First Ramboll Response (refer to **Appendix III**), it is confirmed appropriate to omit an assessment of the completed and operational Proposed Development's effects upon road traffic noise.
- **Wind microclimate** - The scope, methodology and proposed approach set out in the Ramboll EIA Scoping Report (refer to **Appendix I**) and subsequently clarified in the First Ramboll Response (refer to **Appendix III**) is considered appropriate.
- **Daylight, sunlight, overshadowing and solar glare** - The scope, methodology and proposed approach set out in the Ramboll EIA Scoping Report (refer to **Appendix I**) and subsequently clarified in the First Ramboll Response (refer to **Appendix III**) is considered appropriate.

## 5. Topics to be 'Scoped Out' of the ES

5.1 In line with the Ramboll EIA Scoping Report (refer to **Appendix I**), the First Ramboll Response (refer to **Appendix III**), the 13<sup>th</sup> January 2021 Email (refer to **Appendix IV**) and the Second Ramboll Response (refer to **Appendix V**), at the current time it is considered appropriate to scope out the following topic areas from the ES:

- Ecology.
- Contamination.

- Water resource and flood risk.
- Archaeology.
- Telecommunication interference.
- Light spill.
- Waste.
- Climate.
- Major accidents and disasters.
- Human health.

## 6. Topics to be 'Scoped Out' of the ES Subject to Further Information Provided in the Final ES

6.1 In line with the Ramboll EIA Scoping Report (refer to **Appendix I**), the First Ramboll Response (refer to **Appendix III**), the 13<sup>th</sup> January 2021 Email (refer to **Appendix IV**) and the Second Ramboll Response (refer to **Appendix V**), at the current time it is considered appropriate to scope out the following topic areas from the ES:

- Transportation and Accessibility.
- Air Quality (in relation to likely effects associated with the completed and operational traffic flow associated with the Proposed Development in combination with other relevant Cumulative Schemes).

6.2 However, as set out in the 13<sup>th</sup> January 2021 Email (refer to **Appendix IV**), the evidence put forward to justify scoping out the above from the ES in the First Ramboll Response (refer to **Appendix V**) is based the *anticipated* vehicular traffic arising from the Proposed Development. Acknowledging that this traffic data does not represent that of a final and fixed Proposed Development and consistent with the content of the 13<sup>th</sup> January Email (refer to **Appendix IV**) it is advised that the validity of the traffic data presented in the First Ramboll Response (refer to **Appendix III**) is 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 and it would remain appropriate to scope these assessment 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. It is acknowledged that this latter scenario is unlikely.

Appendix I  
The Ramboll EIA Scoping Report

Intended for  
**Berkeley Homes (Central London) Limited**



Date  
**September 2020**

Project Number  
**1620009008**

# **PADDINGTON GREEN POLICE STATION EIA SCOPING OPINION REQUEST REPORT**

**PADDINGTON GREEN POLICE STATION  
EIA SCOPING OPINION REQUEST REPORT**

Project No. **1620009008**  
Issue No. **4**  
Date **16/09/2020**  
Made by **Ben Seward, Callum Mackenzie**  
Checked by **Michelle Wheeler**  
Approved by **Michelle Wheeler**

Made by:  Callum Mackenzie  
Checked/Approved by: 

*This report is produced by Ramboll at the request of the client for the purposes detailed herein. This report and accompanying documents are intended solely for the use and benefit of the client for this purpose only and may not be used by or disclosed to, in whole or in part, any other person without the express written consent of Ramboll. Ramboll neither owes nor accepts any duty to any third party and shall not be liable for any loss, damage or expense of whatsoever nature which is caused by their reliance on the information contained in this report.*

**Version Control Log**

Revision	Date	Made by	Checked by	Approved by	Description
1	09/09/2020	BS/CM	MW	MW	Issue for Client Review
2	14/09/2020	CM	MW	MW	Second Issue for Client Review
3	15/09/2020	BS/CM	MW	MW	For Planning Submission
4	16/09/2020	BS/CM	MW	MW	For Planning Submission

Ramboll  
240 Blackfriars Road  
London  
SE1 8NW  
United Kingdom  
T +44 20 7808 1420  
www.ramboll.co.uk

**CONTENTS**

<b>1.</b>	<b>INTRODUCTION</b>	<b>1</b>
1.1	Background	1
1.2	Purpose of EIA Scoping Report	1
1.3	Consultation Strategy	2
<b>2.</b>	<b>PLANNING CONTEXT</b>	<b>3</b>
2.1	Planning History	3
2.2	Legislation, Planning Policy and Guidance	3
2.3	Application Documents	6
<b>3.</b>	<b>EIA PROCESS</b>	<b>8</b>
3.1	Need for Environmental Impact Assessment	8
3.2	Content and Format of Environmental Impact Assessment	8
3.3	Basis of Environmental Impact Assessment	10
3.4	Baseline Conditions	10
3.5	Alternatives	11
3.6	Assessment Methodology	11
<b>4.</b>	<b>SITE</b>	<b>17</b>
4.1	Site Location	17
4.2	Site Description	18
4.3	On-site and Surrounding Environment and Environmental Considerations	19
<b>5.</b>	<b>PROPOSED DEVELOPMENT</b>	<b>23</b>
<b>6.</b>	<b>POTENTIAL SIGNIFICANT ENVIRONMENTAL IMPACTS AND LIKELY EFFECTS SCOPED IN</b>	<b>25</b>
6.1	Socio-Economics	25
6.2	Air Quality	27
6.3	Noise and Vibration	30
6.4	Wind and Microclimate	33
6.5	Daylight, Sunlight, Overshadowing and Solar Glare	35
6.6	Townscape, Visual and Built Heritage	39
<b>7.</b>	<b>POTENTIAL NON-SIGNIFICANT ENVIRONMENTAL IMPACTS AND EFFECTS</b>	<b>46</b>
7.1	Transport and Accessibility	46
7.2	Ecology	47
7.3	Contamination	48
7.4	Water Resources and Flood Risk	49
7.5	Archaeology	51
7.6	Telecommunication Interference	52
7.7	Light Spill	55
7.8	Waste	56
7.9	Climate	57
7.10	Major Accidents and Disasters	59
7.11	Human Health	59
<b>8.</b>	<b>SUMMARY</b>	<b>61</b>

**LIST OF TABLES**

Table 1.1: Consultees.....	2
Table 2.1: Site Planning History .....	3
Table 6.1: Socio-Economic Study Area.....	26
Table 7.1: Telecommunication and Broadcast Services Appraisal .....	52

## LIST OF FIGURES

Figure 4.1: Site Location.....	17
Figure 4.2: Surrounding Context.....	18
Figure 4.3: Site Redline Boundary .....	19
Figure 4.4: Environmental Sensitivities .....	22
Figure 5.1: Indicative Proposed Block Layout .....	23

## APPENDICES

### Appendix 1

Cumulative Schemes

## 1. INTRODUCTION

### 1.1 Background

Ramboll UK Limited ('Ramboll') has been commissioned by Berkeley Homes (Central London) Limited (hereinafter referred to as the 'Applicant') to prepare a formal Environmental Impact Assessment (EIA) Scoping Opinion Request for the proposed redevelopment of a site at 4 Harrow Road, Paddington, London W2 1XJ (hereinafter referred to as the 'site'). The site is located within the administrative boundary of the Westminster City Council (WCC).

The redevelopment proposals comprise a residential-led scheme (hereinafter referred to as the 'proposed development') for which the Applicant intends to submit a planning application for full planning permission (hereafter referred to as the 'application').

The proposed development falls within Schedule 2 (10(b)) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (hereinafter referred to as the 'EIA Regulations') and, by virtue of factors such as its size, nature or location, is likely to have a significant effect on the environment. On this basis, an EIA for the proposed development will be undertaken.

The findings of the EIA will be reported in an Environmental Statement (ES), which will accompany the application. Ramboll and a team of technical specialists have been commissioned by the Applicant to undertake the EIA and to prepare the ES to accompany the application.

### 1.2 Purpose of EIA Scoping Report

Regulation 15 of the EIA Regulations allows for the Applicant to ask the local planning authority to state in writing their opinion as to the scope of the EIA. This report constitutes a formal request for an EIA Scoping Opinion from the WCC.

The purpose of this EIA Scoping Report is to agree with the WCC the proposed scope of the EIA and the approach to be adopted for the technical assessments to be scoped within the EIA and ES, as well as to facilitate wider consultation with statutory consultees and key stakeholders who may have an interest in the likely significant environmental effects of the proposed development.

This EIA Scoping Report:

- outlines the planning context in Section 2;
- summarises the key considerations of the EIA process in Section 3 and the approach that will be adopted for the EIA of the proposed development;
- describes the key characteristics and the surrounding context of the site in Section 4, providing a plan sufficient to identify the land;
- briefly describes the emerging proposed development for the site including its technical capacity, as appropriate, in Section 5;
- identifies the likely significant environmental effects for the proposed development that are proposed to be scoped in the ES as discrete technical assessment chapters in Section 6, together with the associated proposed scope and assessment methodologies that will be adopted to predict the magnitude of potential impacts, the scale of likely effects, and the significance of the effects; and
- identifies the likely non-significant environmental effects for the proposed development that are proposed to be scoped out of the ES as discrete technical assessment chapters in Section 7.

This EIA Scoping Report has been developed in accordance to the provisions of Regulation 15 of the EIA Regulations, as well as good practice methods.

During the EIA Scoping process, it is anticipated that the WCC will provide an EIA Scoping Opinion which will further inform the scope and methodology of the EIA to be undertaken. When adopting a formal EIA Scoping Opinion, the WCC will take into account the views of statutory consultees and other interested parties.

### 1.3 Consultation Strategy

The process of consultation is a key requirement of EIA and the views of statutory consultees and stakeholders serve to help identify specific issues, as well as highlighting the existence of any information in their possession, or of which they have knowledge, which may be of assistance in progressing the EIA. The key consultees that should be provided the opportunity to contribute to the formal EIA Scoping process include, but are not limited to, those set out in Table 1.1.

Table 1.1: Consultees	
Statutory Consultees	Non-Statutory Consultees
Westminster City Council (WCC)	Thames Water
Environment Agency (EA)	National Grid and other service providers
Natural England (NE)	Metropolitan Police Force and other emergency services.
Historic England (HE)	London Wildlife Trust
Transport for London (TfL)	Canal and River Trust (previously British Waterways)
Greater London Authority (GLA)	Local Ward Councillors
	Local amenity societies and community groups including the Paddington West Partnership, Paddington Development Trust and Local Area Renewal Partnerships (LARP)

Each technical assessment chapter of the ES will include a summary of the relevant consultations undertaken as part of the EIA process.

As part of the design and EIA process, measures will be developed and discussed with relevant consultees (i.e. NE, HE, EA) and other stakeholders where necessary to avoid, reduce, remediate likely adverse effects, or provide enhancements.

## 2. PLANNING CONTEXT

### 2.1 Planning History

This section summarises the key planning history of most relevance to the site and provides background to the existing and consented land uses at the site.

The on-site building was originally consented in the late 1960's (ref. A.174.66) as a 'Divisional Police Station, district headquarters, and section house.' It is understood that construction on the building was completed in 1971.

The most recent planning history of the site is summarised in Table 2.1 and relates mainly to operational works at the site. There are further advertising applications for a public call box, applications for the temporary installation of public art, and for the installation of telecommunications and CCTV equipment on the building.

Table 2.1: Site Planning History	
Reference	Description
01/06109/FULL	Erection of a replacement covered walkways between police station and office annex at first floor level
95/04667/1884	Panel and glazed infill to external covered way
94/00394/1884	Proposed replacement of two security huts
91/04645/1884	Repositioning of observation post
91/03630/1884	Single storey extension to provide cloakroom/baggage store
91/00634/1884	Access ramp for the disabled at main entrance to Paddington Green Police Station on Harrow Road

### 2.2 Legislation, Planning Policy and Guidance

Legislation, planning policy and guidance will inform the scope of technical assessments within the EIA and the identification of sensitive receptors.

The proposed development's compliance to and performance against legislation, planning policy and guidance (together with associated planning standards/targets) will be appraised within the Planning Statement and Design and Access Statement for the application, and not within the EIA. Accordingly, the ES will not provide an exhaustive discussion of legislation, policies and guidance. Instead, a list of legislation and policies that have been considered in preparing the EIA as a whole, will be appended to the ES.

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that any determination under the Planning Act should be made in accordance with the development plan unless material considerations indicate otherwise. The development plan for Westminster consists of:

- The London Plan (March 2016), consolidated with alterations since 2011;
- Westminster City Plan – Strategic Policies, consolidated version adopted November 2016;
- Westminster Policies and Proposals Map – adopted November 2016; and
- Westminster's Unitary Development Plan saved policies, adopted January 2007 (saved policies 2010).

### 2.2.1 National Policy and Guidance

#### **National Planning Policy Framework, 2019**

The 2019 National Planning Policy Framework (NPPF)<sup>1</sup> was published and became immediately effective on 19 February 2019, superseding the July 2018 revision of the 2012 NPPF. It sets out the Government's planning policies for England. It provides within a single document, the greater part of national planning policy advice and articulates the Government's vision for delivering sustainable development. The NPPF is a material planning consideration.

#### **Planning Practice Guidance**

The national Planning Practice Guidance (PPG)<sup>2</sup> is an online resource that provides more detailed, continuously updated information in support of the NPPF. The PPG aims to make planning guidance more accessible, and to ensure that guidance is kept up-to-date. Of note is the EIA guidance presented in the PPG.

### 2.2.2 Regional Policy and Guidance

The EIA will have regard to The London Plan (2016): Spatial Development Strategy for Greater London Consolidated with Alterations Since 2011 (including January 2017 typesetting correction)<sup>3</sup>, and The Intend to Publish London Plan 2019 (December 2019)<sup>4</sup>.

In addition, the following regional supplementary planning guidance (SPG) and strategies will be considered:

- London Environment Strategy (2018)<sup>5</sup>;
- Mayor's Transport Strategy (2018)<sup>6</sup>;
- Affordable Housing and Viability SPG (2017)<sup>7</sup>;
- Culture and Night-Time Economy SPG (2017)<sup>8</sup>;
- Housing SPG (2016)<sup>9</sup>;
- Social Infrastructure SPG (2015)<sup>10</sup>;
- Accessible London: Achieving an Inclusive Environment SPG (2014)<sup>11</sup>;
- Control of Dust and Emissions During Construction and Demolition SPG (2014)<sup>12</sup>;
- Character and Context SPG (2014)<sup>13</sup>;
- London Planning Statement SPG (2014)<sup>14</sup>;

<sup>1</sup> Ministry of Housing, Communities and Local Government, 2019. National Planning Policy Framework. London. HMSO.

<sup>2</sup> Ministry of Housing, Communities and Local Government, 2019. Planning Practice Guidance [online]. Available from: <https://www.gov.uk/government/collections/planning-practice-guidance>

<sup>3</sup> Greater London Authority, 2016 (Updated 2017). The London Plan: The Spatial Development Strategy for London Consolidation with Alterations since 2011. London. GLA.

<sup>4</sup> Greater London Authority, 2019. Intend to Publish London Plan 2019. London. GLA.

<sup>5</sup> Greater London Authority, 2018. London Environment Strategy. London. GLA.

<sup>6</sup> Greater London Authority, 2018. Mayor's Transport Strategy. London. GLA.

<sup>7</sup> Greater London Authority, 2017. Homes for Londoners: Affordable Housing and Viability Supplementary Planning Guidance. London. GLA.

<sup>8</sup> Greater London Authority, 2017. Culture & the Night-Time Economy, Supplementary Planning Guidance. London. GLA.

<sup>9</sup> Greater London Authority, 2016 (Updated 2017). Housing, Supplementary Planning Guidance. Implementation Framework. London. GLA.

<sup>10</sup> Greater London Authority, 2015. Social Infrastructure, Supplementary Planning Guidance. London. GLA.

<sup>11</sup> Greater London Authority, 2014. Accessible London: Achieving an Inclusive Environment, Supplementary Planning Guidance. Implementation Framework. London. GLA.

<sup>12</sup> Greater London Authority, 2014. The Control of Dust and Emissions During Construction and Demolition, Supplementary Planning Guidance. London. GLA.

<sup>13</sup> Greater London Authority, 2014. Character and Context, Supplementary Planning Guidance. London. GLA.

<sup>14</sup> Greater London Authority, 2014. London Planning Statement, Supplementary Planning Guidance. Implementation Framework. London.

- Sustainable Design and Construction SPG (2014)<sup>15</sup>;
- Play and Informal Recreation SPG (2012)<sup>16</sup>;
- All London Green Grid Supplementary Planning Documents (2012)<sup>17</sup>;
- London View Management Framework SPG (2012)<sup>18</sup>;
- London's World Heritage Sites (2012)<sup>19</sup>;
- Planning for Equality and Diversity in London (2007)<sup>20</sup>;
- London's Housing SPG (2016)<sup>21</sup>;
- Affordable Housing and Development Viability SPG (2017)<sup>22</sup>;
- London Central Activities Zone SPG (2016)<sup>23</sup>;
- Accessible London SPG (2014)<sup>24</sup>; and
- Social Infrastructure SPG (2015)<sup>25</sup>.

### 2.2.3 Local Policy and Guidance

The EIA will have regard to the Westminster City Plan (2016)<sup>26</sup> which provides spatial policies, development management policies and site allocations to guide and manage developments in the borough up to and beyond 2027.

The following WCC SPG documents will also be considered:

- WCC Code of Construction Practice (2008);
- City of Westminster Open Space Strategy (2007);
- Development and Demolition in Conservation Areas (1996);
- City of Westminster Inclusive Design and Access (2007);
- Public Realm Credits - Operating a System in Westminster (2011);
- Basement Development in Westminster (2014);
- City of Westminster Trees and Public Realm Strategy (2011);
- Planning Obligations (2008 and new consultation version 2015);
- WCC Air Quality Strategy and Action Plan (2001);
- Paddington Green Conservation Area Audit;
- Designing Out Crime in Westminster (1997);
- Westminster Way: Public Realm Strategy SPD (2011); and
- Trees and the Public Realm: A strategy for Westminster SPD (2011).

<sup>15</sup> Greater London Authority, 2014. Sustainable Design and Construction, Supplementary Planning Guidance. London.

<sup>16</sup> Greater London Authority, 2012. Play and Informal Recreation, Supplementary Planning Guidance. London.

<sup>17</sup> Greater London Authority, 2012. Green Infrastructure and Open Environments: The All London Green Grid, Supplementary Planning Guidance. Implementation Framework. London.

<sup>18</sup> Greater London Authority, 2012. London View Management Framework, Supplementary Planning Guidance. London.

<sup>19</sup> Greater London Authority, 2012. London's World Heritage Sites: Guidance on Settings, Supplementary Planning Guidance. Implementation Framework. London.

<sup>20</sup> Greater London Authority, 2007. Planning for Equality and Diversity in London, Supplementary Planning Guidance to the London Plan. London.

<sup>21</sup> Greater London Authority, 2016. Housing Supplementary Planning Guidance. London. GLA.

<sup>22</sup> Greater London Authority, 2017. Affordable Housing and Development Viability Supplementary Planning Guidance. London. GLA.

<sup>23</sup> Greater London Authority, 2016. Central Activities Zone Supplementary Planning Guidance. London. GLA.

<sup>24</sup> Greater London Authority, 2014. Accessible London Supplementary Planning Guidance. London. GLA.

<sup>25</sup> Greater London Authority, 2015. Social Infrastructure Supplementary Planning Guidance. London. GLA.

<sup>26</sup> Westminster City Council, 2016. Westminster City Plan, London.



#### 2.2.4 Emerging Local Policy and Guidance

**Both the London Plan and Westminster City Plan are undergoing revision at present, which are at the following stages of revision:**

*London Plan – Intend to Publish Version (2019) (and subsequent letters/correspondence with the Secretary of State).*

The London Plan has gone through Examination in Public, and the Secretary of State (SoS) subsequently directed further revisions to the plan. The Plan therefore holds material weight in decision making as it nears adoption.

A number of Mayoral SPG's are currently in draft form following consultation in 2020, including:

- Good Quality Homes for all Londoners;
- Circular Economy Guidance;
- Whole life-cycle carbon assessments;
- Energy Monitoring Guidance;
- Energy Planning Guidance; and
- Fire Safety.

#### **Westminster City Plan 2019-2040**

The Westminster City Plan 2019-2040<sup>27</sup> has been submitted to the SoS for Examination in Public, which is due to take place in Autumn 2020. Several sets of minor modifications have been submitted to the SoS following submission, and many matters remain un-resolved. The draft plan therefore has limited weight in decision making.

Westminster has also set out its intention to publish and develop a number of supplementary guidance and development plan documents (SPD's and DPD's), including a Site Allocations DPD, Planning Obligations and Affordable Housing DPD and others in 2021.

There are no other emerging policies or guidance currently identified.

### 2.3 Application Documents

Whilst subject to ongoing discussion with the WCC, it is anticipated that the following documents will be required to accompany the application:

- Covering Letter and Application form;
- Relevant Certificates and Notices;
- Community Infrastructure Levy (CIL) Additional Information form;
- Site Plan and Site Location Plan 1:1250;
- Existing Site and Demolition Drawings;
- Development Plans (including area schedule and planning drawings);
- Planning Statement;
- Draft Planning Obligations Heads of Terms
- Draft Planning Performance Agreement (PPA)
- Statement of Community Involvement;
- Site Survey (Levels);
- Design and Access Statement (including but not limited to the lighting strategy, landscape strategy, parking and access details);
- Environmental Statement, including:

<sup>27</sup> Westminster City Council, 2019. The Westminster City Plan 2019-2040. London.

- ES Chapters for Socio-Economics; Air Quality; Noise and Vibration; Daylight, Sunlight and Overshadowing; Wind Microclimate; Townscape, Visual and Built Heritage (including Heritage Statement);
- Stand-alone reports presented as Technical Appendices for the following environmental topics to be scoped out as ES chapters: Ecology; Flood Risk; Contamination; Archaeology);
- Internal Daylight and Sunlight Assessment;
- Energy Statement;
- Landscaping Strategy and associated plans;
- Sustainability Statement (including BREEAM Pre-Assessment);
- Transport Assessment including Framework Servicing and Deliveries Management Plan, Travel Plan Construction Logistics Plan; and
- Fire Statement.

### 3. EIA PROCESS

#### 3.1 Need for Environmental Impact Assessment

EIA is a formal process by which the effects of certain types of development projects on the environment are identified, assessed and reported upon and mitigation identified in order for the effects to be taken into account by the relevant competent authority when considering whether to grant planning permission.

The EIA Regulations set out in general terms the content of an ES and allow an Applicant to obtain a formal EIA Scoping Opinion from the relevant planning authority regarding the issues to be considered within the EIA for a specific development proposal; what information should be contained in the ES; and what effects are likely to be more significant than others. EIA best practice encourages applicants to consult other organisations likely to have an interest in a development proposal.

#### 3.2 Content and Format of Environmental Impact Assessment

The specified information to be included in the ES of the proposed development will comply with Regulations 18(3) – 18(5) and Schedule 4 of the EIA Regulations. In summary, the ES will present the following:

- A description of the site, its location and surrounding context and associated environmental sensitivities – baseline conditions;
- A description of the proposed development containing information on:
  - the physical characteristics and land use requirements of the proposed development during the demolition and construction works and of the operational, completed development;
  - the main characteristics of the operational stage of the proposed development including energy demand, nature and quantity of the materials and natural resources used (water, land, soil and biodiversity);
  - the expected residues and emissions (water, air, soil, sub-soil pollution, noise, vibration, light, heat, waste) resulting from the construction and operation of the proposed development;
- A description of the reasonable alternatives studied by the Applicant, as relevant to the proposed development, and the reasons for the selection of the chosen option, including a comparison of the environmental effects;
- A description of the relevant aspects of the baseline and an outline of the likely evolution thereof without the implementation of the proposed development (see 'Do-Nothing scenario' in section 2.5) as far as natural changes from the baseline can be assessed;
- A description of the factors of the environment likely to be significantly affected by the proposed development, including:
  - population;
  - human health;
  - biodiversity (fauna and flora);
  - land (land take);
  - soil;
  - water (quantity and quality);
  - air;
  - climate (greenhouse gas emissions, adaptation to climate change);
  - material assets, including the architectural, archaeological and landscape assets; and
  - the interaction between the above factors.

- A description of the likely significant effects of the proposed development on the environment, which should indicate the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, beneficial and adverse effects of the proposed development resulting from:
  - the construction and existence of the development, including demolition works;
  - the use of natural resources, in particular land, soil, water, biodiversity and the sustainability of resources where possible;
  - the emission of pollutants such as noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;
  - the risk to human health, cultural heritage or the environment (due to accidents or disasters);
  - the accumulation of effects with other existing and/or approved projects, taking into account existing environmental problems or the use of natural resources;
  - impacts on climate (nature and magnitude of greenhouse gas emissions) and the vulnerability of the proposed development to climate change; and
  - the technologies and substances used.
- A description of the forecasting methods used to assess the effects on the environment including details of difficulties encountered and the main uncertainties;
- A description of mitigation measures to avoid, prevent, reduce or where possible, offset any significant adverse effects on the environment and, where appropriate, any proposed monitoring arrangements for both the demolition and construction stage and the completed development stage;
- A non-technical summary of the information provided above;
- A list of references detailing sources used for the descriptions and assessments included in the ES; and
- A statement outlining the relevant experience and/or qualifications of the technical experts who have prepared the ES.

The ES will comprise three volumes:

- Non-Technical Summary
  - Individual volumes of the ES will be summarised within a Non-Technical Summary (NTS), which will outline the key findings of the EIA, presented in non-technical language to assist the reader;
- Volume 1: Main ES Report comprising:
  - Five introductory chapters (Introduction; EIA Process and Methodology; Alternatives and Design Evolution; Proposed Development Description; and Demolition and Construction Description);
  - Technical assessment chapters which will report on the EIA of the proposed development as described in the introductory chapters, as well as in documents that will accompany the application, as explained in Section 2; and
  - Two concluding chapters (Intra-Cumulative Effects; and Summary of Residual Effects).
- Volume 2: Townscape, Visual and Built Heritage Assessment (TVBHA);
- Volume 3: Technical Appendices including amongst others:
  - EIA Scoping Request; Ecological Impact Assessment (EcIA); Flood Risk Assessment (FRA); Ground Conditions Risk Assessment (GCRA), Archaeological Desk Based Assessment (DBA).

### 3.3 Basis of Environmental Impact Assessment

As noted earlier, the EIA will be undertaken based on the proposed development as described in the introductory chapters of ES Volume 1. This is based on the proposed development being designed to a full (detailed) application.

The proposed development will principally be defined by means of the following:

- Demolition and construction methods and control measures;
- Detailed planning application drawings;
- Detailed 3D model;
- Detailed area schedule; and
- Detailed residential unit and tenure mix.

The following supporting documents will accompany the application and will be considered during the EIA:

- Design and Access Statement;
- Energy Statement;
- Sustainability Statement; and
- Application Drawings.

### 3.4 Baseline Conditions

Consideration will be given, as appropriate (and subject to programmed implementation), within the EIA to existing and future site conditions:

- as existing, identified during site surveys, desk-based data collection and/or modelling (Existing Baseline);
- at the time the proposed development is completed, established by means of desk-based prediction, calculation and/or modelling (Future Baseline); and
- in combination with other existing and/or approved development in the cumulative study area of the site, established by means of desk-based prediction, calculation and/or modelling (Cumulative Future Baseline).

In addition, the Alternatives and Design Evolution chapter will consider the 'Do Nothing' scenario (if the proposed development was not to proceed).

#### 3.4.1 Existing and Future Baseline

The EIA will predict the likely scale of change in environmental conditions as a result of the proposed development. The assessment of the scale and significance of a predicted change will be undertaken against a reference condition, known as the baseline. In most cases, the baseline represents the environmental condition of the site and the surrounding study area at the time of the assessment, although it may also include a projected environmental condition at some point in the future, referred to as the future baseline.

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.

Various baseline surveys will be undertaken at the site to inform the emerging development proposals. These surveys will characterise the existing baseline conditions at the site.

Desk-based collection, prediction, calculation and modelling undertaken during the course of the EIA process will utilise information already available, as well as new information provided in response to this EIA Scoping Report. Collectively the information will establish existing and future baselines against which changes introduced by the proposed development will be assessed.

#### 3.4.2 Do Nothing

The EIA Regulations stipulate that the ES should consider the likely evolution of the existing site conditions in the absence of the proposed development (i.e. the 'Do Nothing Scenario'). The evolution of site conditions will be qualitatively reviewed within ES Chapter 3: Alternatives and Design Evolution.

### 3.5 Alternatives

The EIA Regulations require that the ES provides an outline of the reasonable alternatives to the proposed development considered by the Applicant and the reasons for the selection of the preferred option. The alternatives considered in the course of the design process, such as site location, land uses, layouts and design evolution, will be presented. The environmental factors that informed each of the options would be presented as relevant.

### 3.6 Assessment Methodology

#### 3.6.1 Approach

The EIA will be undertaken in line with best practice guidance, which includes the following publications:

- Institute of Environmental Management and Assessment (IEMA):
  - IEMA Guide to Materials and Waste in Environmental Impact Assessment<sup>28</sup>
  - IEMA: Delivering Proportionate EIA<sup>29</sup>;
  - IEMA: Health in Environmental Impact Assessment<sup>30</sup>;
  - IEMA: IEMA Guide to Assessing Greenhouse Gas Emissions and Evaluating their Significance<sup>31</sup>
  - IEMA: Shaping Quality Development<sup>32</sup>.
  - IEMA: Special Report into the State Environmental Impact Assessment Practice in the UK<sup>33</sup>;
  - IEMA: Guidelines for Environmental Impact Assessment<sup>34</sup>;
- Department for Transport: Design Manual for Roads and Bridges (DMRB) – LA series (2019)<sup>35</sup>;
- National Planning Policy Framework (NPPF)<sup>36</sup>;
- Planning Practice Guidance<sup>37</sup>;
- European Commission (EC): EIA of Projects: Guidance on Scoping<sup>38</sup>;

<sup>28</sup> Institute of Environmental Management and Assessment (IEMA), 2020. IEMA Guide to Materials and Waste in Environmental Impact Assessment. IEMA.

<sup>29</sup> IEMA, 2017. Delivering Proportionate EIA. IEMA.

<sup>30</sup> IEMA, 2017. Health in Environmental Impact Assessment. IEMA.

<sup>31</sup> IEMA, 2017. IEMA Guide to Assessing Greenhouse Gas Emissions and Evaluating their Significance. IEMA.

<sup>32</sup> IEMA, 2015. Shaping Quality Development, November 2015. IEMA.

<sup>33</sup> IEMA, 2011. Special Report into the State Environmental Impact Assessment Practice in the UK. IEMA.

<sup>34</sup> IEMA, 2004. Guidelines for Environmental Impact Assessment. IEMA.

<sup>35</sup> Department for Transport, 2019. Design Manual for Roads and Bridges - LA series, July 2019. Department for Transport.

<sup>36</sup> Ministry of Housing, Communities and Local Government, 2019. National Planning Policy Framework. London. HMSO.

<sup>37</sup> Ministry of Housing, Communities and Local Government (Live Document) Planning Practice Guidance [online]. Available: <http://planningguidance.communities.gov.uk/>.

<sup>38</sup> European Commission, 2017. EIA of Projects: Guidance on Scoping, 2017.

- Ministry of Housing, Communities and Local Government Online Resource: Guidance for Environmental Impact Assessment<sup>39</sup>;
- Department for Communities and Local Government (DCLG) [now Ministry of Housing, Communities and Local Government]: Amended Circular on Environmental Impact Assessment (consultation paper)<sup>40</sup>;
- DCLG: Environmental Impact Assessment: A guide to good practice and procedures (consultation paper)<sup>41</sup>; and
- Institute of Environmental Assessment [now IEMA]: Guidelines for Environmental Assessment of Road Traffic<sup>42</sup>.

The EIA will employ a range of tools and approaches aimed at predicting the likely nature and extent of environmental effects. Some technical assessments will rely on mathematical models which provide a numerical estimate of the size of an environmental change or impact, such as the levels of noise or air pollutants likely to arise from net additional traffic, or from heating plant emissions. Other technical assessments will rely on map-based techniques to plot the extent of land use change or habitat loss or use illustrative methods to communicate how the proposed development might appear from a particular viewpoint.

The predictions in the EIA will indicate the nature and scale of the proposed development's likely effects, to enable informed planning decisions about the likely environmental outcomes of the proposed development; however, these predictions may be subject to a degree of uncertainty. As such, the tools employed, and the assumptions made in each case will be developed accordingly and set out clearly.

As a general rule, the EIA will assess the outcome of potential environmental effects that are likely to arise as a consequence of the proposed development. Any in-built mitigation and enhancement measures developed through the proposed development's design evolution will be considered within this assessment, and a level of significance would be applied to the likely effects.

Consideration will be given to any additional mitigation measures that would need to be incorporated/adopted/secured to reduce or off-set adverse effects. In addition, consideration will be given to enhancement measures. The assessment will then be undertaken again as necessary to incorporate the additional identified measures to report on the residual effects. Where significant residual effects are identified, consideration will be given for the need for any proposed monitoring arrangements.

The EIA will consider the proposed development's likely effects during the demolition and construction stage, upon completion and operation (the completed development stage), as well as cumulatively.

The assessment of environmental effects will be undertaken using specific methods of prediction including established guidelines and techniques.

Methods of prediction to be applied within this EIA will be either quantitative or qualitative or, in certain instances, both. Quantitative methods predict measurable changes because of the proposed development and rely on accurately measuring baseline conditions of the site to make accurate predictions with the completed proposed development.

Qualitative assessment techniques will rely on expert judgment and are exercised within a structured framework to ensure consistency of conclusions drawn. Clear distinctions will be made

<sup>39</sup> Ministry of Housing, Communities and Local Government, 2014. Guidance for Environmental Impact Assessment. DCLG.

<sup>40</sup> Department for Communities and Local Government, 2006. Amended Circular on Environmental Impact Assessment: A consultation paper. DCLG.

<sup>41</sup> Department for Communities and Local Government, 2006. Environmental Impact Assessment: A guide to good practice and procedures – a consultation paper. DCLG.

<sup>42</sup> Institute for Environmental Assessment, 1994. Guidelines for Environmental Assessment of Road Traffic. IEA.

between matters of fact, judgement and opinions with all sources identified. Assumptions, degrees of confidence and areas of uncertainty will be clearly stated.

It is anticipated that the demolition and construction programme of the proposed development would be sequenced (phased) over an approximate 5-year period. The EIA will assess and report on the completed development as a whole and not a phased development. This is because no significant delay (i.e. of more than 12 months) is anticipated between the development phases. In addition, a phased assessment is not proposed to be undertaken for the following reasons:

- A robust phasing strategy will be prepared by the Applicant based on detailed consideration of receptors within the immediate surroundings of the site, as well as newly introduced receptors (e.g. residents of completed residential units); and
- The impacts and effects that are likely to arise during the demolition and construction stage would not materially differ on a phase-by-phase basis and therefore robust assessments would be presented in each technical chapter.

The EIA will consider the phased delivery of the proposed development including the introduction of on-site sensitive receptors in completed buildings.

### 3.6.2 Demolition and Construction Stage Effects

ES Volume 1 will contain an introductory chapter (Chapter 5: Demolition and Construction Description) which will describe the proposed development's anticipated redevelopment programme and the key activities that are expected to be undertaken during demolition and construction works. This will form the basis for the assessment of demolition and construction effects.

Understanding of demolition and construction works (methods, techniques, equipment and phasing) is rarely available at the planning application stage. Where this is the case, 'realistic' scenarios will be adopted, with assumptions clearly identified in the relevant technical chapters of the ES. This will be based on demolition and construction methodologies for the site which can be used as a benchmark that would not be exceeded. Outputs will be identified that can be the subject of controls. It should be noted that in using this approach, actual construction methods may be more benign.

The chapter will also outline the measures that would be adopted/incorporated as part of the development proposals to avoid, reduce and mitigate typical environmental impacts and effects during the demolition and construction stage.

Standard measures that will be explored by the Applicant will include:

- re-use and recycling of demolition materials and excavated waste materials;
- appropriate selection and sourcing of construction materials;
- appropriate on-site management and siting of activities in relation to sensitive receptors;
- public safety;
- amenity and site security;
- operating hours;
- noise and vibration controls;
- air and dust management;
- noise and air emissions monitoring;
- hazardous substances storage and control;
- stormwater and sediment control; and
- public liaison.

It is important to note that this chapter of the ES will not assess the significance of likely effects during the demolition and construction works, as this will be addressed within subsequent individual technical assessment chapters of the ES, where relevant.

Chapter 5 will form a framework CEMP and will be a key form of embedded mitigation for the proposed development. It is anticipated that the CEMP will be secured by means of a suitably worded planning condition imposed by the WCC.

### 3.6.3 Completed Development Stage Effects

ES Volume 1 will contain an introductory Chapter 4: Proposed Development Description which will describe the proposed development's physical characteristics, proposed access arrangements, landscaping strategy, utility requirements, estimated emissions and arisings. The description will include mitigation measures embedded within the development proposals.

Assessment of impacts once the proposed development is complete and operational will be based upon the scheme submitted as part of the application, as shown in the drawings and documents submitted to support the application.

### 3.6.4 Cumulative Effects

The EIA Regulations require that, in assessing the effects of a particular development proposal, consideration is also given to the cumulative effects which might arise from the proposal in conjunction with other existing and/or approved development proposals in the vicinity. The following two types of cumulative effects will be considered within the EIA:

- Intra-Project: The effects of different types of impact from the proposed development on receptors at or surrounding the site. Potential impact interactions include the combined effects of noise, dust and visual impacts during demolition and construction of the proposed development on a sensitive receptor; and
- Inter-Project: The effects which are the combined effects generated from the proposed development with other existing and/or approved developments in the vicinity. These other developments may generate their own individually insignificant effects, but when considered together with the proposed development, could amount to a significant cumulative effect, for example, combined townscape and visual impacts from two or more (existing and/or approved) developments.

#### ***Intra-Project Cumulative Effects***

Impact interactions from the proposed development itself on receptors at or surrounding the site will be considered during the demolition and construction works, and once the proposed development is completed.

A qualitative assessment approach will be adopted, comprising the following steps:

- First, a review of the likely residual effects (and in particular the likely significant environmental effects) of each technical assessment within the EIA;
- Second, the likely receptors or receptor groups will be identified;
- Third, the individual effects which may impact a singular receptor or receptor group will be listed in a tabular/matrix format;
- Fourth, the potential for individual effects to interact will be identified; and
- Fifth, the scale of the combined intra-project cumulative effects will be assessed.

Dependent on the relevant sensitive receptors, the assessment will focus either on key individual receptors or on groups considered to be most sensitive to potential interacting effects. The criteria for identifying those receptors which are potentially sensitive will include existing land uses,

proximity to the demolition and construction works and the site, and likely duration of exposure to effects.

Only residual effects that are minor, moderate or major in scale will be considered within the assessment, as negligible effects are, by definition, imperceptible in their nature.

Due to the 'cross-boundary' and 'overlapping' nature of these effects across various environmental topics, and the assessment approach adopted, the results of intra-project cumulative effects will be holistically presented within a discrete assessment chapter (Intra Cumulative Effects) and not within each of the technical assessment chapters. This avoids unnecessary duplication and repetition and presents a proportionate approach.

#### ***Inter-Project Cumulative Effects***

To ensure the proportionate assessment of Inter-Project (in-combination) cumulative effects, the EIA will focus on the consideration of "existing and/or approved projects" as defined in the EIA Regulations. Ramboll has devised the following criteria for the selection of these existing and/or approved projects to ensure a proportional assessment:

- Either: are consented/approved or have resolution to grant or are currently at early stage of demolition/construction; and
- Have a total floor space area of 10,000 m<sup>2</sup> GEA and/or comprise >150 residential units; and
- Either:
  - Within 1 km of the redline boundary/site; or
  - Spatially linked to the site by means of the local road network; or
  - Visible in protected/important views to and from the site.

The criteria has been widely accepted across London boroughs for EIAs of a similar nature and scale.

For those cumulative schemes which have had subsequent amendments, the latest known iteration will be assessed with the EIA. Where reserved matters applications have been consented, consideration would be given to the original consented outline application as this presents the worst case and is the most reasonable approach.

It is proposed that schemes that fall within the spatial and quantum parameters defined above, and which are likely to lead to significant cumulative effects, are quantitatively assessed on a topic by topic basis, subject to the availability of scheme information in the public domain.

**Appendix 1** lists all of the cumulative schemes for consideration within the EIA. It is requested that the WCC review this list and provide any amendments or comments.

Following feedback from the WCC on this list and before submission of the application for the proposed development, if any additional cumulative schemes have been consented during this period, they will be assessed qualitatively through narrative text within the ES.

Further information on the schemes will be drawn from the WCC's planning application register at the time of undertaking the assessments. Where detailed information on schemes are not available to enable quantitative assessment, qualitative assessments would be undertaken.

Inter-project cumulative effects will be addressed within each of the individual technical assessment chapters, in ES Volume 1 and ES Volume 2. Each technical chapter will clearly state which cumulative schemes have been included within the assessment.

### 3.6.5 Significance

Significance is usually a function of the sensitivity (vulnerability/value/ importance) of the resource affected (receptor) and the magnitude of the potential impact.

The value or importance of a receptor could be a function of designation, whereas the vulnerability could be a function of carrying capacity and/or ability to respond to change. Receptor sensitivity will be defined based on a rating of high, medium or low.

The magnitude of impact of impact refers to the degree of change and will be defined based on a rating of high, medium and low/small (or unknown where relevant).

In assessing the magnitude of the impact, the scale and significance of resulting effects, regard will be had to the following:

- The likelihood of the impact/effect occurring, based on a scale of certain, likely or unlikely;
- The duration of the impact/effect, based on a scale of long, medium and short term (temporary);
- The geographical extent of the impacts/effect at local, borough, regional, national and international levels; and
- The reversibility of the impact/effect, being either reversible or irreversible.

Scale of effects will be determined by means of published guidance, matrices and/or application of professional judgement and defined based on a rating of major, moderate, minor, negligible.

Where published industry guidance and terminology do not exist and to provide a consistent approach to the presentation of likely effects, the following terminology will be used throughout the ES:

- Nature/Type of Effects -
  - Adverse: detrimental or negative effect to an environmental resource or receptor;
  - Neutral: effect that on balance, is both beneficial and adverse to an environmental resource or receptor; and
  - Beneficial: advantageous or positive effect to an environmental resource or receptor.
- Scale of Effects -
  - Negligible: effects which are beneath levels of perception;
  - Minor: slight, very short or highly localised effects;
  - Moderate: limited effects (by magnitude, duration, reversibility, value and sensitivity of receptor) which may be considered significant; and
  - Major: considerable effect (by magnitude, duration, reversibility, value and sensitivity of receptor, which may be more than of a local significance or lead to a breach of a recognised environmental threshold, policy, legislation or standard).

Where a particular absolute value, target criteria or threshold is achieved, negligible will be used to describe the effect.

Residual effects will be defined as either 'significant' or 'not significant'. Significant effects would be considered material to the planning decision making process. Based on the above, residual effects of moderate and major scale may be considered significant, but would be dependent on the relevant technical assessment, as well as the existence of published assessment guidance.

Where published assessment guidance is not definitive in respect of categorising/determining significant environmental effects, or where no published guidance is available, professional judgement will be applied, considering the duration, extent and context of the effect, to determine significant effects.

Where there are any deviations to the terminology set out above (e.g. due to published industry guidance or professional judgement), this will be clearly identified and explained within the relevant technical assessment of the EIA.

## 4. SITE

### 4.1 Site Location

The site is located at 4 Harrow Road, Paddington, London W2 1XJ to the immediate north of the A40 Westway as shown in Figure 4.1.

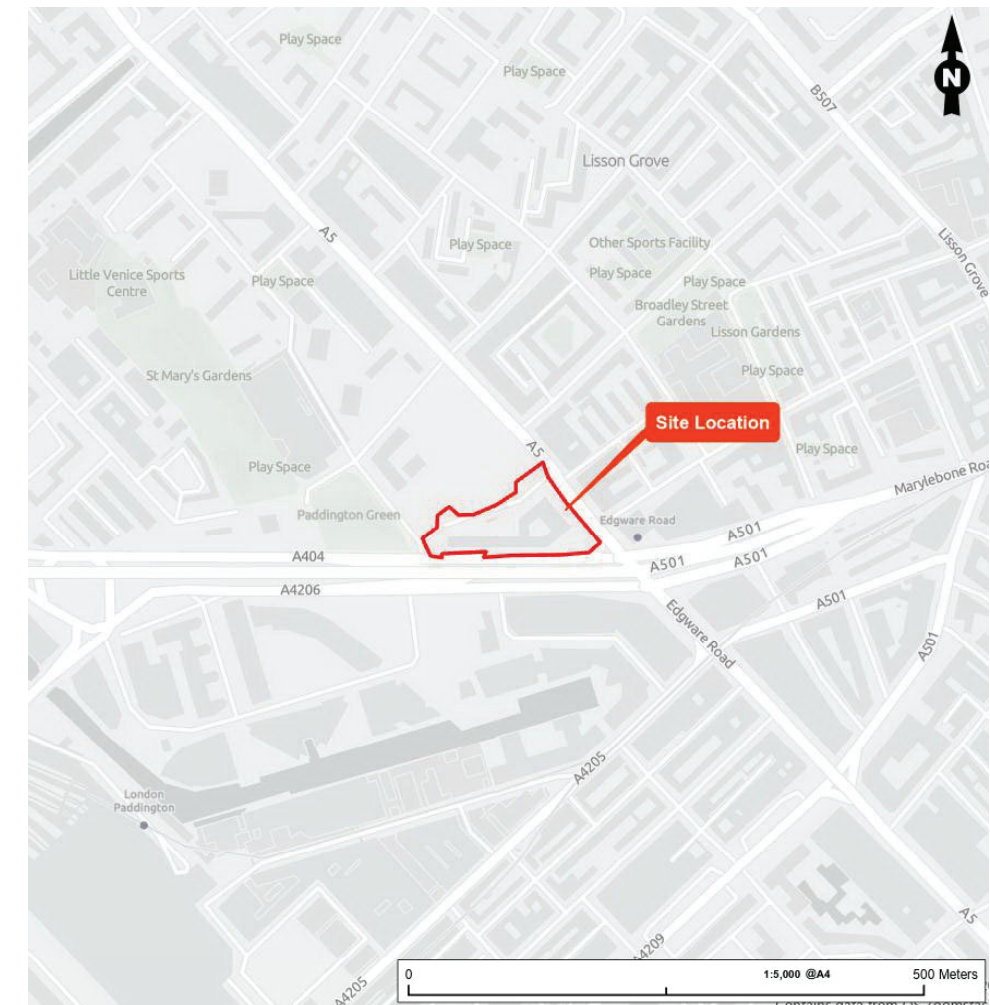


Figure 4.1: Site Location

The site is bound by:

- Newcastle Place road and the 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; and
- Paddington Green road and open space to the west; and
- 14-17 Paddington Green recently been cleared by demolition works prior to the implementation of the WEG application.

As shown in Figure 4.2, the site's surrounding context is of a mixed nature with residential use predominant to the north, north-west and north-east within 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 popular street market; larger scale mixed-use to the south of the A40 in the Paddington Basin (including hotels; the Saint Mary's