

No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
		<p>planning application stage may give rise to significantly different environmental effects (when compared to any previous EIA material) or new previously unidentified environmental effects (when compared to any previous EIA material). In addition, it may not only be the 'design' of a project which gives rise to significantly different or new environmental effects. Other governing factors may include changes to the baseline conditions, changes in assessment methodologies and so forth.</p> <p>In view of the above, the assumption that the original outline scheme would give rise to the worst-case environmental effects may not necessarily be true and should be judged on a case-by-case basis.</p>	<p>cumulative schemes within the assessment of inter-project cumulative effects. It is therefore requested to be mindful of the comments / observations made in relation to Section 3.6.4.</p>	<p>to the outline scheme is particularly relevant in instances where a number of valid but unimplemented permissions were live for any given cumulative site.</p>
7	Section 3.6.4 and Appendix I.	<p>The list of cumulative schemes included within Appendix I of the Ramboll EIA Scoping Opinion Request Report has been reviewed. With reference to cumulative scheme reference number 2 (Two Merchant Square, planning application reference 10/09757/FULL) this cumulative scheme has been partially implemented. Although construction has stalled, there is no indication to suggest the cumulative scheme will not be completed. As such, it is advised that for completeness, this cumulative scheme is included within the assessment of inter-project cumulative effects.</p> <p>An additional cumulative scheme should also be considered within the assessment of inter-project cumulative effects. This additional scheme is that of 5 Kingdom Street (planning</p>	<p>Not applicable. It is assumed that Two Merchant Square (planning application reference 10/09757/FULL) and 5 Kingdom Street (planning application reference 19/03673/FULL) will be included within the assessment if inter-project cumulative effects.</p>	<p>As the two schemes fall within the proposed selection criteria, it is agreed that the cumulative scheme list can be updated to include the two schemes.</p>

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		<p>application reference 19/03673/FULL). The detailed planning application received a resolution to grant planning permission at the end of October 2020.</p>		
8	Section 5.	<p>In describing the emerging proposed Development, reference is made to the provision of "...approximately 8,250 sqm Gross External Area (GEA) of flexible commercial floorspace (class E)".</p> <p>Class E is a wide-ranging land-use class with the variety of land-uses allowable having the potential to give rise to significantly different environmental effects depending on the ultimate end use. It is therefore advised that a strategy be defined to ensure that likely significant environmental effects arising from the provision of flexible commercial floorspace (class E) can be robustly identified via the EIA process and reported in the ES.</p>	<p>Clarification is required as to how the ES will deal with the assessment of flexible commercial floorspace (class E) so as to ensure the robust assessment of all likely significant environmental effects arising from the Proposed Development. This will be particularly important for assessments which are dependent upon floorspace areas.</p>	<p>The introduction of Class E was intended to provide flexible use. The use class by definition is wide-ranging to allow variance in the end use.</p> <p>As with all matters of potential variance the worst-case scenario for each specific specialism will be assessed. This is likely to mean that the area is considered by different specialists as different uses and compositions. This, however, is a ubiquitous practice and should be the standard manner of consideration.</p>
9	Section 6.1.2.	<p>Table 6.1 of the Ramboll EIA Scoping Opinion Request Report sets out various study areas for various elements of the socio-economic assessment. The study area quoted for the assessment of housing delivery is stated to be at the "...neighbourhood and local authority..." level. However, further on in Section 6.1.2 of the Ramboll EIA Scoping Opinion Request Report, it is stated "...delivery of housing will be evaluated by using the quantum of proposed residential units against the identified housing targets set out in WCC policy and the London Plan". This implies that the assessment of housing delivery</p>	<p>Clarification is required as to whether the assessment of housing delivery will be undertaken at the neighbourhood and / or local authority and / or Regional (London wide) level.</p> <p>Clarification is required regarding the intended methodology to be employed to derive the likely number of construction employees.</p> <p>Clarification is required as to whether the assessment of completed and operational jobs will focus on net employees.</p>	<p>The assessment of housing delivery will be undertaken at the neighbourhood and local authority level. The reference to the London Plan is due to the document containing housing targets for each of the London Boroughs.</p> <p>The neighbourhood level of assessment will be based on the actual number of residential units to be brought forward on-site. The local authority level of assessment will be based on the proportion of residential units to be brought forward on-site over the plan period (taking both the targets set out within WCC policy and the London Plan into consideration).</p>

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		<p>would be undertaken at a local authority and Regional (London wide) level.</p> <p>The intended methodology to derive the likely number of construction employees associated with the works required to facilitate the Proposed Development is unclear.</p> <p>With regard to the number of jobs created by the completed and operational Proposed Development, it is unclear whether the EIA process will establish (and therefore the ES report upon) net or gross employees arising from the completed and operational Proposed Development. It is assumed that in accordance with the relevant Additionality Guidance, net employees will be established.</p>		<p>It is stated within the Ramboll EIA Scoping Opinion Request Report that the likely number of construction employees "will be assessed using the latest published results in the Annual Business Survey. To provide further detail, by using the latest published results of the Annual Business Survey, the ratio of total UK annual construction costs compared to total UK annual construction employment will be applied to the capital construction cost provided by the Applicant. This will give the total construction employment for the proposed development assuming a single year of construction which will then be pro-rated to account for the duration of the construction phase.</p> <p>As stated within the Ramboll EIA Scoping Opinion Request Report both the "gross employment as well as net additional above any existing employment levels on-site" will be considered. The net employee calculation will be established in accordance with the Additionality Guide.</p>
10	Section 6.2.	<p>The Ramboll EIA Scoping Opinion Request Report sets out that an assessment of completed and operational road traffic emissions upon ambient air quality is intended to be scoped out of the ES. This is on the basis that the completed and operational Proposed Development is not envisaged to generate significant additional traffic volumes or flows on the local highway network.</p> <p>A pragmatic and proportionate approach to EIA is fully supported. In addition, with the exception of car-parking for the mobility impaired and servicing for the Proposed Development as a whole, it is appreciated that the Proposed Development is intended to be</p>	<p>Further quantified information is required with respect to likely traffic volumes and flows associated with the Proposed Development (both in isolation and with relevant Cumulative Schemes) to allow a more robust and informed judgement as to whether it is appropriate to scope an assessment of competed and operational traffic emissions out of the air quality assessment.</p>	<p>The likely peak and daily (based on an average weekday) traffic volumes and flows associated with the Proposed Development are detailed in point 18.</p> <p>The thresholds set out in 'EPUK and IAQM Land-Use Planning & Development Control: Planning for Air Quality, 2017' are based on Annual Average Daily Traffic (AADT), which take into account traffic volume across all days for a year (including weekends) for a given location. The AADT flows would therefore be expected to be lower than daily weekday flows presented in point 18.</p> <p>The cumulative schemes have been reviewed and they are not expected to add significant traffic on the roads within the vicinity of the site. Further information will be provided to inform the final EIA.</p>

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		<p>car-free. However, servicing trips for large-scale development can be quite significant and residents may well choose to own cars and park them in surrounding streets (subject to relevant parking restrictions).</p> <p>The Ramboll EIA Scoping Opinion Request Report does not provide any quantified evidence to demonstrate that the anticipated traffic generated by the Proposed Development (either in isolation or with relevant Cumulative Schemes) would not exceed the relevant thresholds set out in 'EPUK and IAQM: Land-Use Planning & Development Control: Planning for Air Quality, 2017' at which likely significant air quality effects could result.</p>		<p>Proposed Development – Completed and Operational</p> <p>The proposed development would be car free, except for the provision of nominal disabled car parking. The proposed development is therefore not expected to be a significant net contributor to residential car trips on the roads within the study area.</p> <p>At this stage, the Annual Average Daily Traffic (AADT) trip generation and distribution for the proposed development are expected to be as below for car-parking for the mobility impaired, taxis and servicing:</p> <ul style="list-style-type: none"> • Basement access at Church Street: 90 AADT; • Church Street east of site basement access: 96 AADT; • Church Street west of site basement access: 73 AADT; • Newcastle Place: 55 AADT; • Paddington Green north of Newcastle Place: 73 AADT • Harrow Road: 74 AADT; and • Edgware Road south Church Street: 51 AADT. <p>During the completed development stage, the change in traffic flows brought about by the proposed development on local roads would be below the threshold of 100 AADT within an Air Quality Management Area (AQMA) for an assessment to be necessary according 'EPUK and IAQM Land-Use Planning & Development Control: Planning for Air Quality, 2017'. It is therefore considered appropriate to scope out an assessment of completed and operational traffic emissions of the air quality assessment.</p>

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11	Section 6.2.1 and 6.6.2.	Again, with respect to the assessment of air quality, Section 6.2.1 of the Ramboll EIA Scoping Opinion Request Report states that emissions from centralised energy plant will not be assessed as the Proposed Development does not include for any centralised energy plant. However, it is also stated that the Proposed Development will connect into the existing CHP plant associated with the adjacent WEG. Accordingly, an additional energy loading directly attributable to the Proposed Development will be placed upon the adjacent WEG CHP plant which, in turn, may result in greater CHP emissions. Although the Ramboll EIA Scoping Opinion Request Report notes that this will be considered in the ES, it is unclear whether the ES will include for a necessary full assessment of the additional emissions arising from the increased energy loading of the WEG CHP plant. This is strongly inferred in Section 6.2.2. However, the text provided in both sections is contradictory.	Clarification is required as to whether the ES will include for a full assessment of the additional emissions arising from the increased energy loading of the WEG CHP plant.	<p>The proposed development would not have a separate energy centre as the current MEP strategy is to utilise the spare capacity anticipated in the WEG development's energy centre. Therefore, the sizing of the existing approved combined heat and power (CHP) plant at the WEG development would not require an increase in capacity to accommodate the additional residential units at the proposed development.</p> <p>An assessment of additional energy plant emissions is therefore not required as the WEG development's energy centre has been designed and assessed taking into account the required proposed development energy demand.</p>
12	Section 6.2.2.	In setting out the assessment scenarios for the purposes of the air quality assessment, an existing baseline year of 2019 is stated. It is assumed that this relates to the latest year of fully available air quality monitoring data appropriate for use in the assessment and so is the most appropriate baseline year to consider.	Clarification is sought regarding the rationale for the use of an existing baseline year of 2019.	As recognised by the AY independent review, 2019 is the latest year of fully available air quality monitoring data, also representative of a pre COVID 19 pandemic baseline, and therefore 2019 is the most appropriate baseline year to consider.

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13	Section 6.3.	The intended scope of the noise and vibration assessment seeks to include an assessment of the Site's suitability for residential development. This is commonly scoped out of ESs on the basis that the matter can be considered as a 'design issue' and is not a true 'impact assessment'. That is, there are no residential units currently on the Site and so there are no baseline conditions available to judge environmental change with the proposed Development and residential units in place. It is also noted that a similar rationale is put forward within Section 6.5 of the Ramboll EIA Scoping Opinion Request Report for the assessment of daylight, sunlight and overshadowing internal to the Proposed Development.	Clarification is sought as to whether the Applicant wishes to scope out an assessment of the Site's suitability for residential development in terms of noise and provide this by way of a separate stand-alone document in support of the detailed planning application.	<p>This is a valid observation; however, site suitability is not dealt with consistently in EIA practice. Should the same principle be applied, on-site wind microclimate assessment could arguably also be scoped out of the EIA, similar to daylight, sunlight and overshadowing as there is no existing baseline to assess against. (the same applies to light spill assessments).</p> <p>Assessment against absolute numerical criteria is standard practice in EIA. Both the air quality and noise and vibration assessments seek to demonstrate that future receptors proposed to be introduced to the site, would not be adversely affected by future environmental baseline conditions.</p> <p>Site suitability is closely related to the consideration of human health impacts. To meet the wide scope and broad purpose of the EIA Directive, it is considered appropriate to consider site suitability within the EIA.</p>
14	Section 6.3 and 6.3.2.	The proposed scope of the noise and vibration assessment includes for an assessment of completed and operational Proposed Development road traffic noise. Although it is stated that an assessment will only be provided where road links experience at least a 20% change in traffic attributable to the Proposed Development, based upon previous judgements regarding the Proposed Development's traffic generation, it would seem unlikely that this element of the noise and vibration assessment will be required.	The Applicant may wish to consider providing quantified information in respect to likely traffic volumes and flows associated with the Proposed Development (both in isolation and with relevant Cumulative Schemes) to enable more certainty at the EIA Scoping stage as to whether it is appropriate to scope an assessment of completed and operational road traffic noise into or out of the ES.	<p>The particular paragraph which is referenced here (replicated below for ease of reference), is incorrect and should be disregarded as an assessment of completed development traffic noise effects on existing noise sensitive receptors (NSRs) are proposed to be scoped out:</p> <p><i>"An assessment of the change in road traffic noise from roads around the proposed development will be conducted by comparing the number of vehicle movements with and without the proposed development. The results of this assessment will be used to establish the acoustic effects of the development on existing dwellings in the area. The assessment would be undertaken for road links subjected to at least a 20 % change in traffic flow."</i></p>

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15	Section 6.4.2.	<p>Within the intended scope of the wind and microclimate assessment, it is stated "...Due to the advanced construction stage of the WEG development, it will be considered as part of the existing baseline." This partially clarifies the comment(s) / observation(s) noted in relation to Section 3.4 of the Ramboll EIA Scoping Opinion Request Report. However, for absolute clarity and understanding it would be helpful to understand:</p> <ul style="list-style-type: none"> • The current status of the WEG scheme. • When the WEG scheme is anticipated to be fully completed and operational. • How the above WEG scheme milestone dates relate to the envisaged implementation programme for the Proposed Development. 	<p>Clarification is required regarding:</p> <ul style="list-style-type: none"> • The current status of the WEG scheme. • When the WEG scheme is anticipated to be fully completed and operational. • How the above WEG scheme milestone dates relate to the envisaged implementation programme for the Proposed Development. <p>The above information should be used to clarify how the WEG scheme will be considered in each and every assessment scoped into the ES.</p>	<p>The noise and vibration assessment will consider:</p> <ul style="list-style-type: none"> • Demolition and construction effects on existing and future NSRs; • Completed development effects on existing NSRs in respect of plant noise; and • Completed development effect on future NSRs in respect of site suitability (including vibration, plant noise and traffic noise). <p>As clarified above (see point 4)</p>

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16	Section 6.5.2.	<p>Within the intended scope of the daylight, sunlight, overshadowing and solar glare assessment, it is stated "...Due to the advanced construction stage of the WEG development, it will be considered as part of the existing baseline. However, Blocks B and H of the 14 - 17 Paddington Green scheme which overlaps with the WEG development, will be considered as a cumulative scheme." As above, this partially clarifies the comment(s) / observation(s) noted in relation to Section 3.4 of the Ramboll EIA Scoping Opinion Request Report. However, for absolute clarity and understanding it would be helpful to understand:</p> <ul style="list-style-type: none"> • The current status of the WEG scheme. • When the WEG scheme is anticipated to be fully completed and operational. • How the above WEG scheme milestone dates relate to the envisaged implementation programme for the Proposed Development. • What is meant by Blocks B and H of the 14 - 17 Paddington Green 'overlapping' with the WEG scheme. 	<p>Clarification is required regarding:</p> <ul style="list-style-type: none"> • The current status of the WEG scheme. • When the WEG scheme is anticipated to be fully completed and operational. • How the above WEG scheme milestone dates relate to the envisaged implementation programme for the Proposed Development. <p>The above information should be used to clarify how the WEG scheme will be considered in each and every assessment scoped into the ES.</p> <p>Additional clarification is required in relation to the meaning of Blocks B and H of the 14 - 17 Paddington Green 'overlapping' with the WEG scheme.</p>	<p>As clarified above (see point 4).</p> <p>In relation to 14-17 Paddington Green, this was a 'drop in application' which overlaps with WEG Blocks G and H (not B, apologies) and replaces WEG Blocks G and H to form an extension to the WEG development</p>
17	Section 6.5.2.	<p>With regard to the cumulative assessment of solar glare, it is stated "...Solar glare is not considered in the cumulative scenario as the worst-case scenario is shown in the Proposed Development scenario" This statement is unsubstantiated. However, it is assumed to mean that since solar glare typically results</p>	<p>Clarification and substantiation is required as to why the worst-case solar glare scenario would be that related to the completed and operational Proposed Development in isolation.</p>	<p>The assumed meaning is correct.</p>

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18	Section 7.1.	<p>from light reflection arising from a point source which affects a specific receptor or group of receptors at a specific time and for a specific duration of time, there can be no cumulative or additive solar glare effects resulting from multiple schemes.</p> <p>The Ramboll EIA Scoping Opinion Request Report sets out that an assessment traffic and transport is intended to be scoped out of the ES. This is on the basis of standard tried and tested construction traffic management and that the completed and operational Proposed Development is not envisaged to generate significant additional traffic volumes or flows on the local highway network.</p> <p>A pragmatic and proportionate approach to EIA is fully supported. In addition, with the exception of car-parking for the mobility impaired and servicing for the Proposed Development as a whole, it is appreciated that the Proposed Development is intended to be car-free. However, servicing trips for large-scale development can be quite significant and residents may well choose to own cars and park them in surrounding streets (subject to relevant parking restrictions).</p> <p>The Ramboll EIA Scoping Opinion Request Report does not provide any quantified evidence to demonstrate that the anticipated traffic generated by the Proposed Development (either in isolation or with relevant Cumulative</p>	<p>Further quantified information is required with respect to likely traffic volumes and flows associated with Proposed Development (both for the demolition and construction works and the completed and operational Development in isolation and with relevant Cumulative Schemes) to allow a more robust and informed judgement as to whether it is appropriate to scope the topic of transport and accessibility out of the ES.</p>	<p>Baseline, Future Baseline and Cumulative Traffic Flows</p> <p>The cumulative schemes have been reviewed and they are not expected to add significant traffic on the roads within the study area of the site. Further information will be provided to inform the final EIA.</p> <p>For the purposes of this response, indicative traffic flows (including the WEG and 14-17 PG developments) are provided below:</p> <ul style="list-style-type: none"> Edgware Road: Peak hours around 1,500 to 1,700, and daily flows around 31,100. Church Street: Peak hours around 150 to 200, daily flows around 2,500. Paddington Green: Peak hours around 100 to 120, daily flows around 1,500. <p>Newcastle Place is proposed to be stopped up. The road primarily facilitates access to the former police station and the new street would be mainly used for the proposed development.</p>

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		<p>Schemes) would not exceed the relevant thresholds at which significant traffic and transport and accessibility effects could result with reference to the 'Institute of Environmental Management. Guidelines for the Environmental Assessment of Road Traffic, 1993.'</p>		<p>Demolition and Construction Stage Traffic</p> <p>Demolition and construction traffic estimates for the proposed development have been provided by the Applicant.</p> <p>The highest construction traffic generated in one week would be 56 vehicles (one-way). Assuming a 5.5 day working week and a 10 hour working day, this equates to an average of one HGV per hour (one-way).</p> <p>This is very low and will not affect severance, pedestrian delay, pedestrian amenity, fear and intimidation, driver delay, or accidents and safety. Demolition and construction traffic would be managed through the CEMP and Construction Logistics Plan (CLP). Accordingly, no significant traffic and transport effects are expected during demolition and construction.</p> <p>Proposed Development - Completed Development Stage Traffic</p> <p>The proposed development would be car free, except for the provision of nominal disabled car parking, and is therefore not expected to be a significant net contributor to residential car trips onto the surrounding roads.</p> <p>The indicative vehicle trip generation for the proposed development is provided below. These have been discussed with TfL and WCC and agreed in principle during pre-application meetings.</p> <p>Car drivers (use Church Street to access basement):</p> <ul style="list-style-type: none"> AM Peak: 3 arrival, 10 departure PM Peak: 7 arrival, 4 departure

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				<ul style="list-style-type: none"> Weekday: 40 vehicles two-way Taxis (use one-way Newcastle Place): AM Peak: 2 vehicles one-way PM Peak: 2 vehicles one-way Weekday: 12 vehicles one-way Servicing (residential deliveries use one-way Newcastle Place, commercial deliveries use Church Street to access basement): AM Peak: 3 vehicles on Newcastle Place, 6 vehicles on Church Street PM Peak: 3 vehicles on Newcastle Place, 1 vehicle on Church Street Weekday: 51 vehicles on Newcastle Place, 31 vehicles on Church Street <p>Total</p> <p>In total, the proposed development is expected to generate the following indicative two-way trips: 34 in the AM Peak, 22 in the PM peak, and 228 daily trips. Note these are two-way trips, but Newcastle Place is one-way and therefore vehicles would not be returning in the same direction.</p> <p>On Church Street, 13 to 25 two-way vehicle trips are estimated in the peak hours, and 102 two-way vehicle trips are expected in a day.</p> <p>On Newcastle Place, the proposed development is expected to generate around 5 one-way vehicles in each peak hour and 63 one-way daily vehicles.</p>

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19	Section 7.2.	<p>It is considered appropriate and robust to scope the topic of ecology out of the ES.</p> <p>As noted in relation to Section 3.2 and 3.3 it is proposed that a stand-alone Ecological Impact Assessment will be provided within the Technical Appendices of the ES. However, ecology is to be scoped out of the ES. As such, it is unclear why an Ecological Impact Assessment needs to be included within a Technical Appendix which would technically form part of the ES.</p> <p>Natural England have prepared a standard consultee response in respect of the EIA Scoping process (refer to Appendix I). Natural England's comments do not change the intended scope of the ES with respect to ecological matters.</p>	<p>Clarification is required as to why an Ecological Impact Assessment is intended for inclusion within the ES despite being a topic that is appropriate to scope out of the ES.</p> <p>The Applicant is invited to consider and confirm if there is an opportunity to slim down the ES further by submitting the Ecological Impact Assessment as a stand-alone report entirely out-with the ES. The stand-alone Ecological Impact Assessment would be submitted to fulfil planning, not EIA requirements.</p>	<p>Summary</p> <p>Based on the expected vehicle routes to the site, the proposed development daily flows represent less than 1 % of traffic on Edgware Road, 4 % of traffic on Church Street and 5 % to 7 % on Paddington Green. Traffic flows on the new Newcastle Place are expected to be low.</p> <p>The peak hour flows are very low and would not affect severance, pedestrian delay, pedestrian amenity, fear and intimidation, driver delay, or accident and safety.</p> <p>Therefore, the proposed development is not expected to exceed the relevant thresholds at which significant traffic and transport and accessibility effects could result.</p> <p>Please see the comments at Point 1</p>

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20	Section 7.3.	As for the topic of ecology, it is considered appropriate and robust to scope the topic of contamination out of the ES. As noted in relation to Section 3.2 and 3.3 it is proposed that a stand-alone Preliminary Risk Assessment will be provided within the Technical Appendices of the ES. However, contamination is to be scoped out of the ES. As such, it is unclear why a Preliminary Risk Assessment needs to be included within a Technical Appendix which would technically form part of the ES.	Clarification is required as to why a Preliminary Risk Assessment is intended for inclusion within the ES despite being a topic that is appropriate to scope out of the ES. The Applicant is invited to consider and confirm if there is an opportunity to slim down the ES further by submitting the Preliminary Risk Assessment as a stand-alone report entirely out-with the ES. The stand-alone Preliminary Risk Assessment would be submitted to fulfil planning, not EIA requirements.	Please see the comments at Point 1
21	Section 7.4.	It is considered appropriate and robust to scope the topic of water resources and flood risk out of the ES. As noted in relation to Section 3.2 and 3.3 it is proposed that a stand-alone Flood Risk Note / Memorandum will be provided within the Technical Appendices of the ES. However, the topic of water resources and flood risk is to be scoped out of the ES. As such, it is unclear why a Flood Risk Note / Memorandum needs to be included within a Technical Appendix which would technically form part of the ES. It is suggested that the demonstration of a suitable surface water drainage strategy, foul water drainage strategy and other 'embedded' design features to achieve sustainable water usage can be described in a specific section in	Clarification is required as to why a Flood Risk Note / Memorandum is intended for inclusion within the ES despite being a topic that is appropriate to scope out of the ES. The Applicant is invited to consider and confirm if there is an opportunity to slim down the ES further by submitting the Preliminary Risk Assessment as a stand-alone report entirely out-with the ES. The stand-alone Preliminary Risk Assessment would be submitted to fulfil planning, not EIA requirements. Clarification is required as to whether ES Volume 1 - Chapter 4: Proposed Development Description will include for a description of the Proposed Development's inherent surface water drainage strategy, foul water drainage	Please see the comments at Point 1 It can be confirmed that ES Chapter 4 will provide a description of the proposed development's inherent surface water drainage strategy, foul water drainage strategy and other 'embedded' design features which would achieve sustainable water usage etc.

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22	Section 7.5.	ES Volume 1 - Chapter 4: Proposed Development Description. Thames Water have prepared a standard consultee response in respect of the EIA Scoping process (refer to Appendix I). Thames Water's comments do not change the intended scope of the ES with respect to water resources and flood risk. The justification for potentially scoping the topic of archaeology out of the ES is well reasoned. However, there is no information on the location and extent (vertically and laterally) of the Proposed Development's basement construction or piling location and depth which is assumed to be significant given the likely height of the buildings proposed. Without this information, and in view of the fact that the Site is located within the Tier 2 Watling Street Archaeological Priority Area (APA) it is difficult to judge if the Proposed Development would likely give rise to any additional and / or significant archaeological effects over and above those which have already occurred due to historic on-Site development and nearby adjacent development.	In order to inform a decision on whether it is appropriate to scope the topic of archaeology out or into the ES, clarification is required regarding the location, vertical extent and lateral extent of the Proposed Development's basement excavation together with other ground works (such as piling) necessary to facilitate the Proposed Development.	The APA indicates a general enhanced potential for the area it covers, but actual potential depends on the site-specific conditions. In the site, potential for any Roman or medieval remains is likely to have already been severely compromised by 19th and 20th century development. The basement would consist of two levels: <ul style="list-style-type: none"> B1 – which would extend over the majority of the footprint of the site, would have an excavation depth of approximately 24.3 mAOD and a finished floor level of approximately 27.8 mAOD. B2 – which would be smaller and would be partially located within the footprint of the western Block (Block I). The excavation depth would be approximately 23.3 mAOD and the finished floor level would be approximately 24.8 mAOD. The length of the piles would vary, depending on whether they are to support superstructure column loads, but it is anticipated that the piles would largely be between approximately 15 m to 25 m in length. Where large loads are transferred from the superstructure the piles would

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				<p>increase in length to between 30 m - 45 m below the ground surface.</p> <p>Given the relatively shallow nature of the underlying natural brickearth and gravel geologies in relation to the likely impact of modern basement construction, it has been assumed for the purpose of scoping that the proposed development would remove all archaeological remains within its footprint, with piling outside the basement removing any remains within each pile footprint.</p> <p>Detailed information on basement and foundation design will be robustly assessed for their impact against baseline conditions in the proposed Archaeological Desk-based Assessment.</p>
23	Section 7.9.	<p>It is considered appropriate and robust to scope the topic of climate out of the ES. However, rather than relying on information intended to be scoped out of the ES to demonstrate how the Proposed Development seeks to reduce carbon emissions and ensure long-term resilience to climate change (that is via the proposed reference to the Flood Risk Note / Memorandum and Energy and Sustainability Assessment (including BREEAM Assessment) it is suggested that the demonstration of these factors which will form an inherent part of the Proposed Development be summarised within a specific section of ES Volume 1 - Chapter 4: Proposed Development Description.</p>	<p>Clarification is required as to whether ES Volume 1- Chapter 4: Proposed Development Description will include for a description of the Proposed Development's inherent design features / attributes which will reduce carbon emissions and ensure long-term resilience to climate change.</p>	<p>The Applicant agrees with the review comment and will ensure that ES Chapter 4 contains details of measures included at the design stage to reduce GHG emissions and ensure the development is resilient to climate change.</p>

No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
24	Section 7.11.	<p>It is considered appropriate and robust to scope the topic of human health of the ES. However, rather than relying on the inference that can be drawn from the results of various technical assessments which may have direct and indirect influences and effects upon human health, it is suggested that ES Volume 1 - Chapter 4: Proposed Development Description includes for a description of those elements of the Proposed Development that could contribute to healthy lifestyles. This could also include cross-references to various assessments scoped into the ES and other stand-alone documents to be submitted in support of the planning application.</p>	<p>Clarification is required as to whether ES Volume 1- Chapter 4: Proposed Development Description will include for a description of the Proposed Development's inherent design features / attributes which could contribute to healthy lifestyles together with cross-reference to various assessments scoped into the ES and other relevant stand-alone documents to be submitted in support of the planning application.</p>	<p>It is assumed that this is affirmation of the Applicant's proposal to scope human health out as a discrete technical assessment chapter of the ES.</p> <p>It is confirmed that ES Chapter 4 will provide details of measures included within the proposed development to contribute to healthy lifestyles and human health.</p>
25	Section 8.	<p>The preliminary content and structure of the ES set out in the Ramboll EIA Scoping Opinion Request may require amendment depending on various Applicant responses to this independent review.</p>	<p>Refer to all of the above.</p>	<p>Understood. Please see the above comments/responses.</p>
26	Appendix I.	<p>Refer to commentary provided in relation to Section 3.6.4.</p>	<p>Refer to commentary provided in relation to Section 3.6.4.</p>	<p>Please see comments Point 6</p>

4. Next Steps

- 4.1 As noted in Section 1, WCC and Avison Young (on behalf of WCC) are keen to work pro-actively with the Applicant and their team in order to progress a formal EIA Scoping Opinion. It is suggested that following the Applicant's review and consideration of Section 3, direct liaison occurs between the Applicant team, WCC and Avison Young to ensure a full and correct understanding of both the Ramboll EIA Scoping Opinion Request Report and the content of Section 3 of this Report, together with the intended response to the additional information / clarification requests set out within Section 3 of this Report. Again, as noted in Section 1, it is fully appreciated that when authoring, reporting and reviewing substantially detailed reports such as the Ramboll EIA Scoping Opinion Request Report, there could be an element of unintentional misinterpretation and misunderstanding such that various matters set out within Section 3 may be irrelevant, immaterial and / or easily resolvable.
- 4.2 Following liaison between the Applicant team, WCC and Avison Young, a full written response to Section 3 of this Report is requested under Part 4, Paragraph 15 (3) of the EIA Regulations.
- 4.3 Following receipt of a full written response to Section 3 of this Report, WCC and Avison Young will consider the response and use this (together with the Ramboll EIA Scoping Opinion Request Report) to formulate and issue a formal EIA Scoping Opinion.

Appendix I

Consultee Responses Received to Date

Contact Details

Enquiries

Hannah Fiszpan
020 7911 2695
Hannah.Fiszpan@avisonyoung.com

Visit us online

avisonyoung.co.uk

Appendix IV

The 13th January 2021 Email

Avison Young

65 Gresham Street, London EC2V 7NQ

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From: _____
To: _____
Cc: _____
Subject: Paddington Green Police Station - EIA Scoping Discussions
Date: 13 January 2021 17:55:00
Attachments: [image001.jpg](#)

Hi Ben, Michelle,

Many thanks for your time earlier today. For the purposes of a clear audit trail, I set out the items discussed and the relevant actions:

1. Based upon the contents of the Applicant's 'EIA Scoping Opinion Request Report' (September 2020) ('the September 2020 EIA Scoping Opinion Request') and the responses provided to Avison Young's 'Independent Review of the Environmental Impact Assessment (EIA) Scoping Opinion Request Report' (December 2020) ('the December 2020 Response to the EIA Scoping Opinion Request Review') subject to the points and required actions / further clarification request below, I am satisfied that intended scope of the forthcoming ES is appropriate.
2. With reference to **item 10** in the December 2020 Response to the EIA Scoping Opinion Request Review, it is clear that the *anticipated* vehicular traffic arising from the Proposed Development would not give rise to significant air quality effects. Acknowledging that the traffic data does not represent that of a final and fixed Proposed Development, it is requested that the validity of the traffic data already presented 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 air quality effects would arise from the final and fixed Proposed Development then this should be explained / evidenced in the forthcoming ES and it would remain appropriate to scope this component of assessment out of the ES. If, however, this is not the case, then an appropriate assessment of completed and operational Proposed Development road traffic emissions (including for relevant Cumulative Schemes) will be required for inclusion with the ES. It is acknowledged that this latter scenario is unlikely.
3. With reference to **item 11** in the December 2020 Response to the EIA Scoping Opinion Request Review, whilst the WEG Energy Centre may have the *existing capacity* to service the Proposed Development, it still remains unclear whether the new and additional land uses associated with the completed and operational Proposed Development to be 'plugged into' the WEG Energy Centre would give rise to increased emissions to ambient air quality and therefore give rise to significant air quality effects.

It was explained that the air quality assessment for the WEG ES assessed emissions from the Energy Centre on the basis of the worst-case maximum WEG parameters, and with the former Paddington Green Police Station land uses 'plugged in' to the Energy Centre. Clarification is therefore required in relation to the following:

- a. Have changes in assessment methodologies and relevant baseline conditions since undertaking the aforementioned assessment altered in such a way that significantly different air quality effects could result?
- b. What would be the implications of substituting the Paddington Green Police Station land uses with the proposed Development land uses? It is assumed that the proposed Development would have a much greater energy demand than the former Paddington Green Police Station and so has the potential to give rise to significantly different air quality effects?

Until such time that it can be evidenced that there would be no significant air quality effects arising from 'plugging in' the Proposed Development to the WEG Energy Centre, it will be recommended to Westminster City Council (WCC) that the air quality assessment within the ES includes for an assessment of the Proposed Development's associated heating and plant emissions.

4. With reference to **item 18** in the December 2020 Response to the EIA Scoping Opinion Request Review, once again, it is clear that the *anticipated* vehicular traffic arising from the Proposed Development would not give rise to significant transport and traffic (environmental) effects. Acknowledging that the traffic data does not represent that of a final and fixed Proposed Development, it is requested that the validity of the traffic data already presented 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 transport and traffic (environmental) effects would arise from the final and fixed Proposed Development then this should be explained / evidenced in the forthcoming ES and it would remain appropriate to scope this component of assessment out of the ES. If, however, this is not the case, then an appropriate assessment of transport and traffic (environmental effects) will be required for inclusion with the ES. It is acknowledged that this latter scenario is unlikely.

We verbally agreed that points 2 and 4 were an appropriate way to proceed. However, if you could provide further clarification in relation to the point 3 that would be appreciated. Following this, I will provide my final advice to Westminster City Council (WCC) and a formal EIA Scoping Opinion will follow.

Any questions, please do feel free to call.

Best regards,

Hannah.

Hannah Fiszpan
Director, Environmental Planning

avisonyoung.co.uk
7NQ
65 Gresham Street, London, EC2V 7NQ



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Appendix V
The Second Ramboll Response

From: _____
To: _____
Cc: _____
Subject: FW: Paddington Green Police Station - EIA Scoping Discussions
Date: 02 February 2021 14:15:50
Attachments: [image002.jpg](#)
Importance: High

External Sender

Dear Hannah
Apologies for the delay.

Please see our clarification responses in red below. Hope these are helpful and will enable you to finalise your EIA Scoping Opinion feedback to WCC.

Should you have any further questions, please do not hesitate to let us know.

Kind regards and take care
Michelle and Ben

Kind regards
Michelle Wheeler

Senior Managing Consultant
1702706 - London

Ramboll
240 Blackfriars Road
London
SE1 8NW
<https://uk.ramboll.com/environment-and-health>
Ramboll UK Limited Registered in England & Wales Company No: 03659970
Registered office: 240 Blackfriars Road, London SE1 8NW

From:
Sent: 13 January 2021 17:55
To:
Cc:
Subject: Paddington Green Police Station - EIA Scoping Discussions

Hi Ben, Michelle,

Many thanks for your time earlier today. For the purposes of a clear audit trail, I set out the items discussed and the relevant actions:

1. Based upon the contents of the Applicant's 'EIA Scoping Opinion Request Report' (September 2020) (the September 2020 EIA Scoping Opinion Request) and the responses provided to Avison Young's 'Independent Review of the Environmental Impact Assessment (EIA) Scoping Opinion Request Report' (December 2020) (the December 2020 Response to the EIA Scoping Opinion Request Review) subject to the points and required actions / further clarification request below, I am satisfied that intended scope of the forthcoming ES is appropriate.
2. With reference to **item 10** in the December 2020 Response to the EIA Scoping Opinion Request Review, it is clear that the anticipated vehicular traffic arising from the Proposed Development

would not give rise to significant air quality effects. Acknowledging that the traffic data does not represent that of a final and fixed Proposed Development, it is requested that the validity of the traffic data already presented 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 air quality effects would arise from the final and fixed Proposed Development then this should be explained / evidenced in the forthcoming ES and it would remain appropriate to scope this component of assessment out of the ES. If, however, this is not the case, then an appropriate assessment of completed and operational Proposed Development road traffic emissions (including for relevant Cumulative Schemes) will be required for inclusion with the ES. It is acknowledged that this latter scenario is unlikely.

As discussed this is understood and accepted. The traffic data will be confirmed once design freeze is achieved and will be presented/validated in the ES. Should this data indicate an increase from that presented in our EIA Scoping Opinion response, the difference will be clarified, or alternatively, appropriate assessments will be undertaken.

3. With reference to **item 11** in the December 2020 Response to the EIA Scoping Opinion Request Review, whilst the WEG Energy Centre may have the existing capacity to service the Proposed Development, it still remains unclear whether the new and additional land uses associated with the completed and operational Proposed Development to be 'plugged into' the WEG Energy Centre would give rise to increased emissions to ambient air quality and therefore give rise to significant air quality effects.

Feedback from the Applicant's MEP specialists confirm that the WEG Energy Centre was originally assessed at its full capacity.

Detailed design of WEG and 14-17 PG has confirmed that the full capacity of the WEG energy centre will not be utilised. There will be spare capacity available which would be sufficient to supply in the PGPS demand.

In addition, the specialists have highlighted that the existing PGPS site has historically been served by an outdated, inefficient gas boiler system. Removal of this system will benefit local air quality.

It was explained that the air quality assessment for the WEG ES assessed emissions from the Energy Centre on the basis of the worst-case maximum WEG parameters, and with the former Paddington Green Police Station land uses 'plugged in' to the Energy Centre. Clarification is therefore required in relation to the following:

- a. Have changes in assessment methodologies and relevant baseline conditions since undertaking the aforementioned assessment altered in such a way that significantly different air quality effects could result?

No change in air quality methodologies have taken place since the last air quality assessment was undertaken for WEG + 14-17 PG in September 2018. The Applicant's MEP has confirmed that there would be no change in energy plant emissions in respect of off-site receptors.

The assessment for the PGPS will account for emissions from the WEG energy centre when considering site suitability.

- b. What would be the implications of substituting the Paddington Green Police Station land uses with the proposed Development land uses? It is assumed that the proposed Development would have a much greater energy demand than the former Paddington Green Police Station and so has the potential to give rise to significantly different air quality effects?

The proposed development land use is expected to have a higher energy demand than the previous PGPS land use. However, the increased energy use is in the form of electric demand, rather than gas/fossil fuels, which the existing site utilised. As stated above, the outdated, inefficient gas boiler system at the PGPS site will be

replaced. Therefore the air quality will be improved compared the previous PGPS land use.

Until such time that it can be evidenced that there would be no significant air quality effects arising from 'plugging in' the Proposed Development to the WEG Energy Centre, it will be recommended to Westminster City Council (WCC) that the air quality assessment within the ES includes for an assessment of the Proposed Development's associated heating and plant emissions.

4. With reference to **item 18** in the December 2020 Response to the EIA Scoping Opinion Request Review, once again, it is clear that the anticipated vehicular traffic arising from the Proposed Development would not give rise to significant transport and traffic (environmental) effects. Acknowledging that the traffic data does not represent that of a final and fixed Proposed Development, it is requested that the validity of the traffic data already presented 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 transport and traffic (environmental) effects would arise from the final and fixed Proposed Development then this should be explained / evidenced in the forthcoming ES and it would remain appropriate to scope this component of assessment out of the ES. If, however, this is not the case, then an appropriate assessment of transport and traffic (environmental effects) will be required for inclusion with the ES. It is acknowledged that this latter scenario is unlikely.

Please see point 2. above.

We verbally agreed that points 2 and 4 were an appropriate way to proceed. However, if you could provide further clarification in relation to the point 3 that would be appreciated. Following this, I will provide my final advice to Westminster City Council (WCC) and a formal EIA Scoping Opinion will follow.

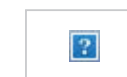
Any questions, please do feel free to call.

Best regards,

Hannah.

Hannah Fiszpan
Director, Environmental Planning

avisonyoung.co.uk
65 Gresham Street, London, EC2V 7NQ



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