2.2.1 National Policy and Guidance

National Planning Policy Framework, 2019

The 2019 National Planning Policy Framework (NPPF)[1] 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)[2] 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)[3], and The Intend to Publish London Plan 2019 (December 2019)[4].

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

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

[1] Ministry of Housing, Communities and Local Government, 2019. National Planning Policy Framework. London. HMSO.
[2] Ministry of Housing, Communities and Local Government, 2019. Planning Practice Guidance [online]. Available from: https://www.gov.uk/government/collections/planning-practice-guidance
[3] Greater London Authority, 2016 (Updated 2017). The London Plan: The Spatial Development Strategy for London Consolidation with Alterations since 2011. London. GLA.
[4] Greater London Authority, 2019. Intend to Publish London Plan 2019. London. GLA.
[5] Greater London Authority, 2018. London Environment Strategy. London. GLA.
[6] Greater London Authority, 2018. Mayor's Transport Strategy, London. GLA.
[7] Greater London Authority, 2017. Homes for Londoners: Affordable Housing and Viability Supplementary Planning Guidance. London. GLA.
[8] Greater London Authority, 2017. Culture & the Night-Time Economy, Supplementary Planning Guidance. London. GLA.
[9] Greater London Authority, 2016 (Updated 2017). Housing, Supplementary Planning Guidance. Implementation Framework. London. GLA.
[10] Greater London Authority, 2015. Social Infrastructure, Supplementary Planning Guidance. London. GLA.
[11] Greater London Authority, 2014. Accessible London: Achieving an Inclusive Environment, Supplementary Planning Guidance. Implementation Framework. London. GLA.
[12] Greater London Authority, 2014. The Control of Dust and Emissions During Construction and Demolition, Supplementary Planning Guidance. London. GLA.
[13] Greater London Authority, 2014. Character and Context, Supplementary Planning Guidance. London. GLA.
[14] Greater London Authority, 2014. London Planning Statement, Supplementary Planning Guidance. Implementation Framework. London.

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

2.2.3 Local Policy and Guidance

The EIA will have regard to the Westminster City Plan (2016)[26] 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).

[15] Greater London Authority, 2014. Sustainable Design and Construction, Supplementary Planning Guidance. London.
[16] Greater London Authority, 2012. Play and Informal Recreation, Supplementary Planning Guidance. London.
[17] Greater London Authority, 2012. Green Infrastructure and Open Environments: The All London Green Grid, Supplementary Planning Guidance. Implementation Framework. London.
[18] Greater London Authority, 2012. London View Management Framework, Supplementary Planning Guidance. London.
[19] Greater London Authority, 2012. London's World Heritage Sites: Guidance on Settings, Supplementary Planning Guidance. Implementation Framework. London.
[20] Greater London Authority, 2007. Planning for Equality and Diversity in London, Supplementary Planning Guidance to the London Plan. London.
[21] Greater London Authority, 2016. Housing Supplementary Planning Guidance. London. GLA.
[22] Greater London Authority, 2017. Affordable Housing and Development Viability Supplementary Planning Guidance. London. GLA.
[23] Greater London Authority, 2016. Central Activities Zone Supplementary Planning Guidance. London. GLA.
[24] Greater London Authority, 2014. Accessible London Supplementary Planning Guidance. London. GLA.
[25] Greater London Authority, 2015, Social Infrastructure Supplementary Planning Guidance. London. GLA.
[26] 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[27] 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:

[27] 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[28]
  - IEMA: Delivering Proportionate EIA[29];
  - IEMA: Health in Environmental Impact Assessment[30];
  - IEMA: IEMA Guide to Assessing Greenhouse Gas Emissions and Evaluating their Significance[31]
  - IEMA: Shaping Quality Development[32].
  - IEMA: Special Report into the State Environmental Impact Assessment Practice in the UK[33];
  - IEMA: Guidelines for Environmental Impact Assessment[34];
- Department for Transport: Design Manual for Roads and Bridges (DMRB) – LA series (2019)[35];
- National Planning Policy Framework (NPPF)[36];
- Planning Practice Guidance[37];
- European Commission (EC): EIA of Projects: Guidance on Scoping[38];

[28] Institute of Environmental Management and Assessment (IEMA), 2020. IEMA Guide to Materials and Waste in Environmental Impact Assessment. IEMA.
[29] IEMA, 2017. Delivering Proportionate EIA. IEMA.
[30] IEMA, 2017. Health in Environmental Impact Assessment. IEMA.
[31] IEMA, 2017. IEMA Guide to Assessing Greenhouse Gas Emissions and Evaluating their Significance. IEMA.
[32] IEMA, 2015. Shaping Quality Development, November 2015. IEMA.
[33] IEMA, 2011. Special Report into the State Environmental Impact Assessment Practice in the UK. IEMA.
[34] IEMA, 2004. Guidelines for Environmental Impact Assessment. IEMA.
[35] Department for Transport, 2019. Design Manual for Roads and Bridges - LA series, July 2019. Department for Transport.
[36] Ministry of Housing, Communities and Local Government, 2019. National Planning Policy Framework. London. HMSO.
[37] Ministry of Housing, Communities and Local Government (Live Document) Planning Practice Guidance [online]. Available: http://planningguidance.communities.gov.uk/.
[38] European Commission, 2017. EIA of Projects: Guidance on Scoping, 2017.

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

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

[39] Ministry of Housing, Communities and Local Government, 2014. Guidance for Environmental Impact Assessment. DCLG.
[40] Department for Communities and Local Government, 2006. Amended Circular on Environmental Impact Assessment: A consultation paper. DCLG.
[41] Department for Communities and Local Government, 2006. Environmental Impact Assessment: A guide to good practice and procedures – a consultation paper. DCLG.
[42] 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 to 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^2 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.

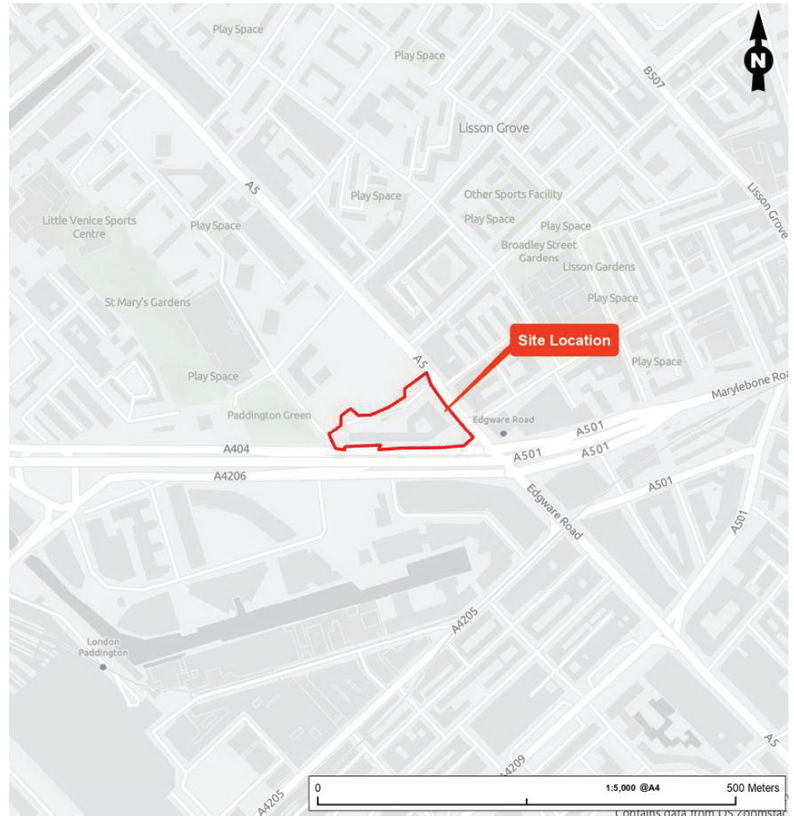

Figure 4.1: Site Location

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

Hospital; offices; and residential uses); and educational facilities (including the City of Westminster College Paddington Green campus) to the north-west.

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

Figure 4.2: Surrounding Context

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

4.2 Site Description

As shown in Figure 4.3, the site redline boundary is approximately triangular in shape and occupies much of the street frontage of the street block on which it sits, covering a total site area of approximately 0.83 ha.

The site is currently occupied by the Paddington Green Police Station, which has been in this location since the 1970's. The building was acquired by the Applicant in 2020 following the relocation of the police station to Church Street in 2018.

The ground surface of the site is generally level, at approximately 32.000 m AOD.

The building is underlain be a one level of basement used for on-site parking.

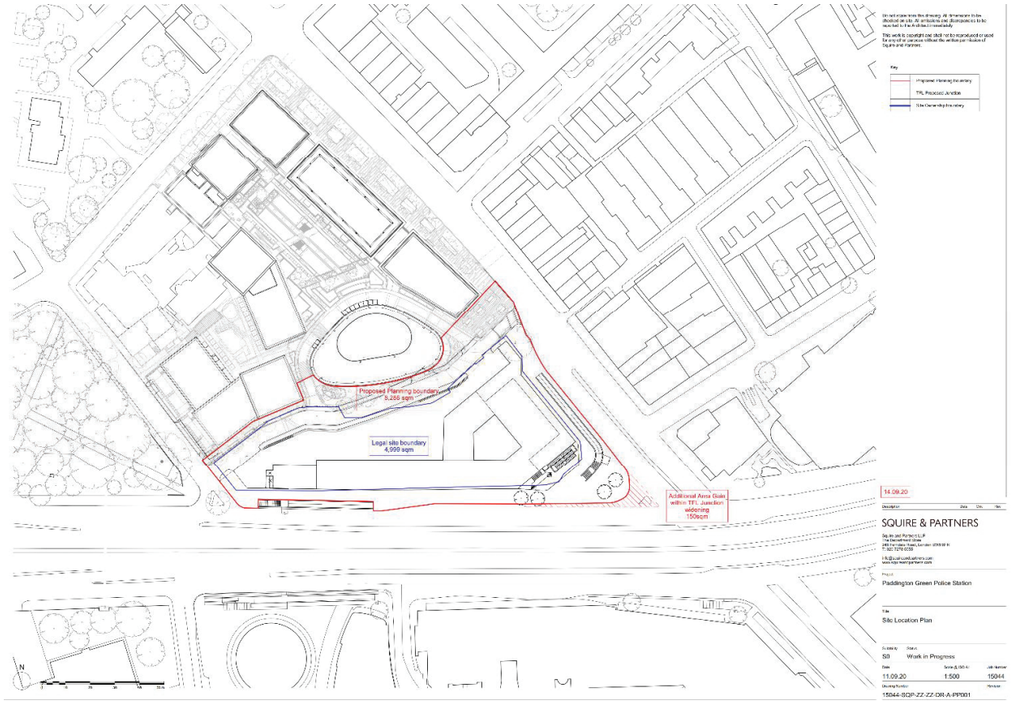

Figure 4.3: Site Redline Boundary

4.3 On-site and Surrounding Environment and Environmental Considerations

Geological maps for the area indicate that the geology beneath the site is underlain by Langley Silt Member (Clay and Silt), Lynch Hill Gravels and London Clay Formation.

Historic[43] and recent[44] ground investigations undertaken at the site indicates the following ground stratigraphy at the site:

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

The superficial Langley Silt Member and London Clay at depth are classified by the EA as Unproductive Strata. The intermediate Lynch Hill Gravel is classified as a 'Secondary A' aquifer, described as '*permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers*'. The site is not located within a groundwater Source Protection Zone.

There are no surface water features on the site and no main rivers located within a 1 km radius. The closest surface water features are the Grand Union Canal, located approximately 150 m to the

[43] Soil Mechanics 1995
[44] LEAP Environmental 2015

south and the Boating Lake at Regent's Park approximately 1 km to the north-east. No additional surface water features have been identified within 1 km of the site.

A review of EA data indicates that the site is located in Flood Zone 1 (low probability) where the annual probability of flooding from rivers or the sea is less than 1 in 1,000 (0.1%). The site is also shown by the EA to be at Very Low or Low risk of surface water (pluvial) flooding, associated with potential surcharging of the drainage network during extreme rainfall events.

The site is not shown to be within a Critical Drainage Area (CDA) as shown in the WCC 2010 Strategic Flood Risk Assessment (SFRA).

A Phase 1 Habitat Survey of the site undertaken on 4 September categorised the existing habitats on-site as negligible to site level importance for wildlife. Limited vegetation is present, with street trees of site level importance and scattered ephemeral vegetation of negligible importance. The street trees are suitable for use by common bird species. No potential roost features were recorded on the buildings or trees, and the site is considered to be of negligible potential for use by bats.

The nearest Local Nature reserve (LNR) is the St John's Wood Church Grounds LNR approximately 1 km north-east of the site.

The site is located within Little Venice ward.

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

The northern half of Newcastle Place, which is within the redline boundary, is located within Paddington Green Conservation Area, but otherwise the site is not within a CA.

The Paddington Green Children's Hospital (a three storey, red terracotta Grade II listed building dating back to approximately 1895) and 17 and 18 Paddington Green (residential terrace houses Grade II listed dating back to approximately 1800) are located to the north-west.

There are also several Grade II listed structures within the adjacent Paddington Green public open space, including telephone kiosks (corner of Harrow Road and Paddington Green) and a statue, in addition to the Grade II* Church of St Mary's, which is located further west within Paddington Green.

The site is not located within one of the designated views under the London View Management Framework, nor in a locally designated view.

The prevailing townscape character comprises the following:

- To the north-west of the site, the area is dominated by the Hall Place Estate which features a mixture of medium scale residential blocks and tower blocks;
- To the north, north-east and east of the site beyond Edgware Road, the area is densely built up, generally characterised by three to five storey terraces and small post-war blocks with ground floor retail lining Edgware Road;
- To the south of the site, beyond the A40, the area is dominated by Paddington Basin, mainly comprising large scale commercial buildings, generally of recent construction, arranged in relatively coherent groupings; and
- To the west of the site, the area features a mix of smaller scale historic buildings, open space, low rise post-war housing, stuccoed villas, mansion blocks and educational uses (The City of Westminster College). Parts of this area lies within the Paddington Green and Maida Vale CAs.

The site is situated in a highly accessible location with a public transport accessibility level (PTAL) rating of 6b. Edgware Road Underground Station is approximately 50 m to the east of the site and Paddington Station approximately 400 m to the south-west of the site. There are also good bus,

pedestrian and cycle routes in the vicinity of the site, with the following three London Cycle Network (LCN) routes in the locality of the site:

- Route 50 which provides a link between Marylebone and Hendon;
- Route 5 links Edgware and Battersea; and
- Route 36 provides links to Twickenham and Hammersmith.

Due to the site's urban location it is affected by road traffic noise.

The site is located within an Air Quality Management Area (AQMA) declared under the Environment Act 1995, which incorporates the whole City of Westminster (CoW). The AQMA has been designated due to the high traffic flows within the CoW which give rise to concentrations of pollutants nitrogen dioxide (NO_2) and fine particulates (PM_{10}) that exceed the current National Air Quality Standard objectives.

The site falls outside the designated London Congestion Charging Zone.

The prevailing wind direction is south-westerly with a secondary north-easterly wind.

With respect to telecommunications users and sensitive receptors (primarily terrestrial and satellite television users) it is expected that due to the nature of building use around the site, there will be a high number of different radio networks and services in use for communications and remote monitoring needs. A number of different wireless and radio technologies will be in use for both public and private requirements.

Figure 4.4 presents the publicly available environmental sensitivity data sets for the site and surrounding study area.

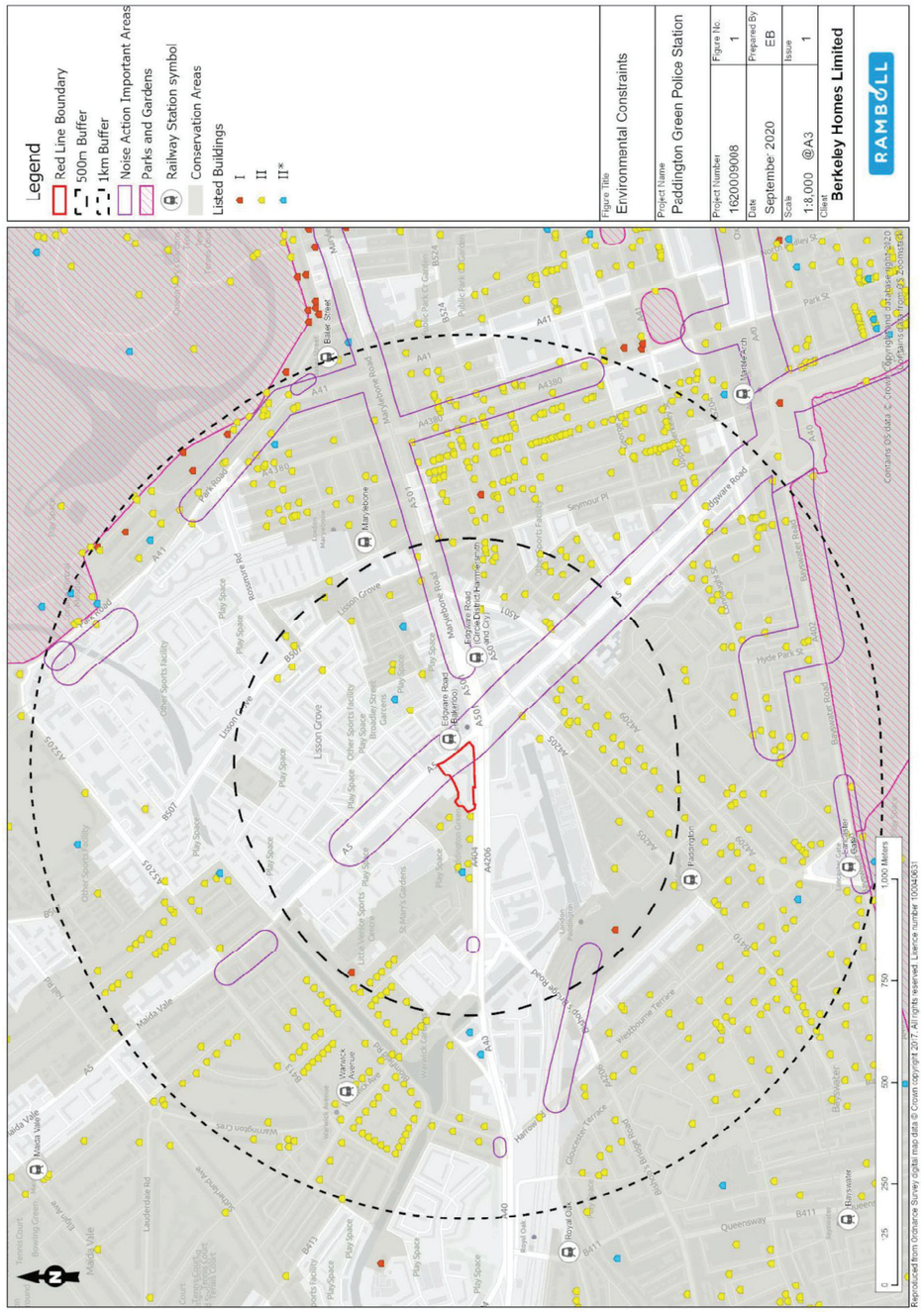

Figure 4.4: Environmental Sensitivities

5. PROPOSED DEVELOPMENT

The development proposals, which are currently being refined through the on-going pre-application design and planning process, are envisaged to comprise the:

- demolition of the Paddington Green Police Station;
- excavation of a basement connection to the West End Gate development basement;
- erection of three blocks along, set back from, Harrow Road and Edgware Road;
- delivery of ground floor commercial uses and residential at upper floors, with associated landscaped residential gardens; and
- stopping up of Newcastle Place with associated landscaping and cycle parking.

The proposed land uses are likely to comprise:

- approximately 650 homes, including 260 affordable housing units (Class C3);
- approximately 8,250 m^2 gross external area (GEA) flexible commercial space (Class E);
- servicing and disabled parking at basement level; and
- connection to the West End Gate (WEG) basement and energy centre with combined heat and power (CHP) plant.

Building heights would range from approximately Ground plus 13 to Ground plus 24 storeys with the taller element up to Ground plus 38 storeys.

The proposed development would be car free with the exception of minimal disabled parking provision.

An indicative layout plan is shown at Figure 5.1.

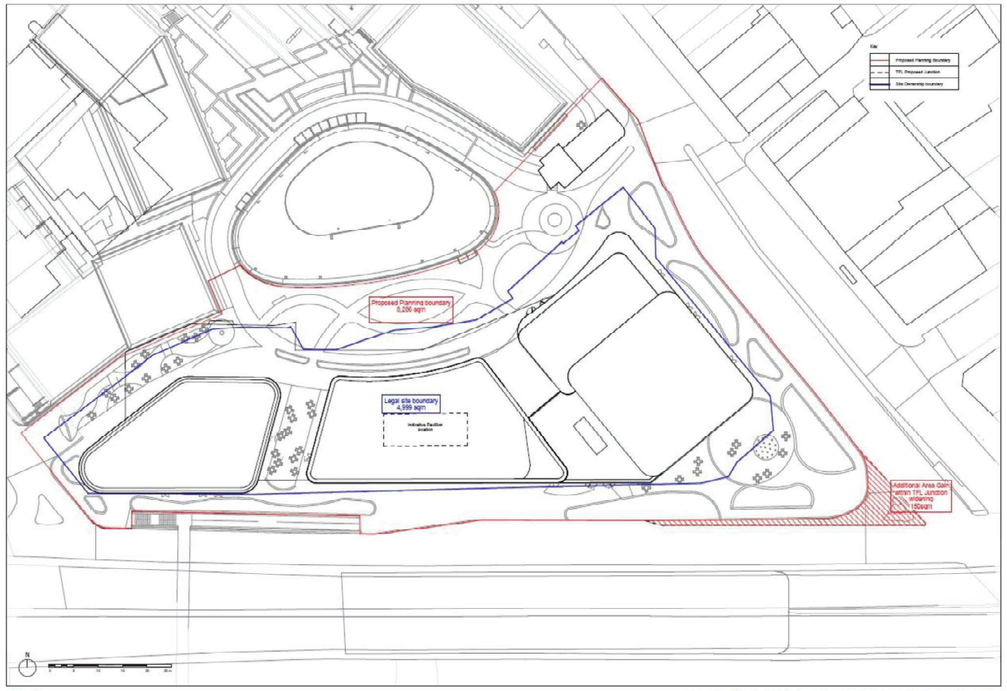

Figure 5.1: Indicative Proposed Block Layout