

Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
Section 7.4.	to be included within a Technical Appendix which would technically form part of the ES.	stand-alone Preliminary Risk Assessment would be submitted to fulfil planning, not EIA requirements.	
	<p>It is considered appropriate and robust to scope the topic of water resources and flood risk out of the ES.</p> <p>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.</p> <p>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 ES Volume 1 - Chapter 4: Proposed Development Description.</p> <p>Thames Water have prepared a standard consultee response in respect of the EIA Scoping process (refer to <b>Appendix I</b>). Thames Water's comments do not change the intended scope of the ES with respect to water resources and flood risk.</p>	<p>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.</p> <p>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.</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 surface water drainage strategy, foul water drainage strategy and other 'embedded' design features which would achieve sustainable water usage etc.</p>	
Section 7.5.	The justification for potentially scoping the topic of archaeology out of the ES is	In order to inform a decision on whether it is appropriate to scope the topic of	

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Section 7.9.	<p>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.</p>	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.	
	<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>	

Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
Section 7.11.	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.	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.	
Section 8.	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.	Refer to all of the above.	
Appendix I.	Refer to commentary provided in relation to Section 3.6.4.	Refer to commentary provided in relation to Section 3.6.4.	

## 4. Next Steps

- 4.1As 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.
- 4.2Following 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.
- 4.3Following 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

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



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

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### BY EMAIL ONLY

[northplanningteam@westminster.gov.uk](mailto:northplanningteam@westminster.gov.uk)

Dear Mr Barrett

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Please send any new consultations, or any further information on this consultation to: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)

Yours sincerely

Sally Ireland  
Consultations Team

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

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

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

23 September 2020

Dear Sir/Madam

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

Waste Comments

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Water Comments

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

Yours faithfully  
Development Planning Department

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## Appendix III The First Ramboll Response



# Independent Review of the Environmental Impact Assessment (EIA) Scoping Opinion Request Report

## Paddington Green Police Station

9<sup>th</sup> November 2020

**Client Name:** Westminster City Council

**Report Title:** Independent Review of the EIA Scoping Request Report

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### Appendices

Appendix I    Consultee Responses Received to Date

**Prepared By:** Hannah Fiszpan

**Status:** ISSUED

**Date:** 9<sup>th</sup> November 2020

**For and on behalf of Avison Young (UK) Limited**



# 1. Introduction

- 1.1. Berkeley Homes (Central London) Limited (the ‘Applicant’) intend to submit a full detailed planning application for the redevelopment of a 0.83 hectare (ha) site (the ‘Site’), located at 4 Harrow Road, Paddington, London W2 1XJ to the immediate north of the A40 Westway. The Site lies within the City of Westminster and is currently occupied by the (unoccupied) Paddington Green Police Station.
- 1.2. At the current time, the Applicant’s proposals (the ‘Proposed Development’) envisage:
  - Demolition of the Paddington Green Police Station.
  - Construction of three new buildings which could range from approximately ground plus 13-storeys in height, ground plus 24-storeys in height, and ground plus 38-storeys in height.
  - Excavation of a basement linking into the Applicant’s adjacent West End Gate (WEG) basement located to the north of the Site.
  - The provision of approximately 650 new homes, including approximately 260 affordable homes (located within the upper levels of the new buildings).
  - The provision of approximately 8,250 sqm Gross External Area (GEA) of flexible commercial floorspace (located at ground floor, first and second floor levels within the new buildings).
  - The provision of servicing and car-parking for the mobility impaired only at basement level. Aside from car-parking for the mobility impaired, the Proposed Development is envisaged to be car-free.
  - Connection to the WEG energy centre with combined heat and power (CHP) plant.
  - Comprehensive landscaping including public realm improvements.
  - Residential amenity areas including residents’ roof gardens and children’s play space.
  - The stopping up of Newcastle Place.
- 1.3. Under the Town and Country Planning (Environmental Impact Assessment) Regulations, 2017 (as amended) (the ‘EIA Regulations’), the Development is recognised to be ‘EIA development’. Accordingly, the Applicant commissioned Ramboll as Lead EIA Consultant to manage and coordinate the entire pre-planning EIA process for the Proposed Development, including the preparation of an EIA Scoping Request Report and an Environmental Statement (ES).

- 1.4. In accordance with Part 1 4 (5) of the EIA Regulations, Westminster City Council (WCC) (as the determining authority) wish to ensure “...*they have, or have access as necessary to, sufficient expertise to examine the ES...*”  
As such, Avison Young are appointed to assist WCC in ensuring the forthcoming ES (including its scope) will be compliant with the requirements of the EIA Regulations, current EIA best practice and relevant EIA case law.

## 2. Work to Date and Purpose of this Report

- 2.1

In September 2020, pursuant to Regulation 15 of the EIA Regulations, the Applicant submitted a request for an EIA Scoping Opinion to WCC. This comprised a report prepared by Ramboll (the ‘Ramboll EIA Scoping Opinion Request Report’) setting out the intended scope and content of the forthcoming ES.
- 2.2

In line with their statutory duties, WCC undertook consultation with relevant consultees in order to inform their forthcoming EIA Scoping Opinion.
- 2.3

Avison Young have undertaken a review of the Ramboll EIA Scoping Opinion Request Report, undertaken a review of consultee comments received to date in respect of the EIA Scoping process, and have engaged with WCC in respect of key findings and recommendations. In conclusion, although Avison Young agree with majority of the intended scope of the ES, additional information and clarification is required in order to make a robust evaluation of the proposed scope of forthcoming ES. Accordingly, under Part 4, Paragraph 15 (3) of the EIA Regulations, WCC request additional information and clarification from the Applicant prior to adopting an EIA Scoping Opinion.
- 2.4

In view of the above, this Report sets out:

The key comments and observations of Avison Young in respect of the Ramboll EIA Scoping Opinion Request Report.

The key comments and observations of Avison Young in respect of consultee comments received to date (where relevant).

Additional information and clarification requested from the Applicant in order to inform a robust EIA Scoping Opinion.

2.5

The above is set out in tabular form within Section 3 and Appendix I of this Report. It is of note that an empty column exists within the tables of Section 3 so that the Applicant can easily provide responses.

2.6

It should be noted that 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. Furthermore, 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.
- Client Name: Westminster City Council

Report Title: Independent Review of the EIA Scoping Opinion Request Report
- ## 3. Independent Review of the Ramboll EIA Scoping Opinion Request Report
- Table 1: Independent Review of the Ramboll EIA Scoping Opinion Request Report
- | No | Reference within the Ramboll EIA Scoping Opinion Request Report | Independent Review Comment(s) / Observation(s)  | Additional Information / Clarification Request  | Applicant's Response  |
|----|---|---|---|---|
| 1  | Section 2.3.  | <p>Reference is made to the ES comprising a range of stand-alone reports as Technical Appendices for the purposes of providing an evidence based to prove it is appropriate to scope out various topics from full assessment in the ES. Such stand-alone reports cover the topic areas of ecology, flood risk, contamination and archaeology.</p> <p>On the basis of the information provided within the Ramboll EIA Scoping Opinion Request Report, it would seem entirely appropriate to scope out the topics of ecology, flood risk and contamination from the ES. However, with reference to further comments / observations below (refer to Section 7.5), it is currently unclear whether it is appropriate or not to scope archaeology out of the ES.</p> <p>In addition to the above, if a topic is to be scoped out of the ES, it is unclear as to why that topic area needs to be considered within a Technical Appendix which would technically form part of the ES. It is suggested that such stand-alone reports can be submitted to support the detailed planning application out-with the ES.</p> | <p>Further information / clarification is required prior to confirming whether the topic of archaeology can be scoped out of the ES (refer to Section 7.5).</p> <p>Clarification is required as to why reports relating to specific topic areas to be scoped out of the ES are (by default) included in the ES via incorporation into Technical Appendices 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 such reports as stand-alone reports entirely out-with the ES. The stand-alone reports would be to fulfil planning, not EIA requirements.</p> | <p>Please see point 22 (below) for an explanation of the justification for Archaeology to be scoped out.</p> <p>The inclusion of technical assessments that are scoped out as technical assessment chapters in ES Volume 2: Main Environmental Statement as technical assessment reports in ES Volume 3: Technical Appendices is a standard practice typically used to ensure that all relevant material is located within the same collective document and to avoid a paper chase. This is particularly the case where scoped-in ES chapters reference topics that have been scoped out, for example the framework construction environmental management (CEMP) that will be presented in ES Chapter 5: Demolition and Construction Description.</p> |
- Date: 9<sup>th</sup> November 2020

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No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
2	Section 3.2.	Refer to commentary provided in relation to Section 2.3.	Refer to commentary provided in relation to Section 2.3.	Please see above (point 1)
3	Section 3.3.	The Proposed Development is (in part) defined as "... <i>demolition and construction methods and control measures</i> ". As such, it is assumed that any legislative requirements and standard tried and tested sectorial mitigation (such as a Site-specific Construction Management Plan (CEMP)) will be relied upon to establish the potential for likely significant environmental effects (not likely significant residual effects) to occur. In other words, all legislative requirements and standard tried and tested sectorial mitigation will not be viewed as 'additional mitigation' required over and above that proposed by the Proposed Development.	Clarification is required in respect of how legislative requirements and standard tried and tested sectorial mitigation will be applied and considered as part of the EIA process.	It can be confirmed, as indicated in section 3.6.2, that ES Chapter 5: Demolition and Construction Description will present the framework construction environmental management plan (CEMP) for the proposed development, which will be considered embedded mitigation for the purposes of the EIA.  <i>"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."</i>
4	Section 3.4.	Information is provided in relation to relevant 'baseline conditions' to be considered within the EIA process and the ES.  With reference to Section 4.1 of the Ramboll EIA Scoping Opinion Request Report it is understood that the Applicant's adjacent WEG scheme is partially implemented. As such, the adjacent site of the WEG scheme is in a continual state of flux and will likely remain so for certain period.  WEG is not referenced in the list of cumulative schemes included within Appendix I. However, it is not made explicitly clear if the ES will assume that the WEG scheme is fully completed	Clarification is required regarding how the adjacent WEG scheme will be considered in each and every assessment scoped into the ES.	The WEG development (16/12162/FULL) is located immediately to the north of the site and under the control of the Applicant. The WEG development is at an advanced stage of construction.  To the west of the WEG development is the 14-17 Paddington Green site which benefits from full planning permission (18/08004/FULL and associated Listed Building Consent 18/080110/LBC) and forms an overlap to/extension of the WEG development, replacing Blocks G and H of WEG. This scheme is also under the control of the Applicant. Demolition works have been completed for 14-17 PG, although no construction works have commenced.

No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
		and operational for the purposes of all assessments scoped into the ES.		WEG Blocks A-F would be fully completed and occupied by Q3 2022. Construction of 14-17 PG Blocks G and H would be completed and occupied by Q1 2025.  Because of the close proximity of these two schemes to the site and the certainty in respect of their delivery, these two schemes will not be purely considered in the cumulative scenario of the EIA, as clarified below.  Based on the current construction works, the defined ' <b>existing baseline</b> ' for the purposes of the EIA will include the completed massing for WEG Blocks A-F (with only Block C occupied).  It is anticipated that the proposed development would commence demolition and construction works on-site in Q1 2021 and would be completed and become operational in Q4 2028.  For simplicity, the defined ' <b>future baseline</b> ' for the demolition and construction stage assessment of the EIA, will assume WEG Blocks A - F completed and fully occupied by the time that the proposed development works commence on-site. Construction works on 14-17 PG Blocks would be ongoing.  The defined ' <b>future baseline</b> ' for the completed development stage, will assume all WEG and 14-17 PG Blocks (A-H) completed and occupied.  Therefore, in summary: <ul style="list-style-type: none"><li>Existing Baseline: WEG Blocks A-F completed, but only Block C occupied;</li><li>Future Baseline (2021 or worst-case year for transport/air quality/noise and vibration): Blocks A-F</li></ul>

No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
				<p>completed and occupied with Blocks G and H being built out concurrently; and</p> <ul style="list-style-type: none"><li>Future Baseline 2028: Blocks A-H completed and occupied.</li></ul> <p>The following approach would be adopted in the EIA:</p> <p><b>Demolition and construction stage assessment:</b> All of the WEG Blocks would be considered as ‘existing’ sensitive receptors for the purposes of all of the technical assessment chapters scoped into the EIA. This takes into account the fact that the Wind; Daylight, Sunlight and Overshadowing; and Townscape, Visual and Built Heritage Assessments will be based on qualitative assessments.</p> <p>It is acknowledged that the construction of Blocks G and H would overlap with the demolition and construction works of the proposed development; however due to the minor nature of Blocks G and H, and the control measures to be adopted as part of the respective sites’ CEMPs, significant cumulative effects in respect of transport, air quality and noise, are considered unlikely to arise.</p> <p><b>Completed development stage assessment:</b> The WEG and 14-17 PG developments are anticipated to be fully completed, occupied and operational by the time the proposed development becomes operational and would therefore form part of the future baseline.</p> <p>On this basis, the following scenarios will be assessed:</p> <ul style="list-style-type: none"><li>Existing Baseline (which includes WEG Blocks A to F massing but with only Block C occupied);</li></ul>

No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
				<ul style="list-style-type: none"><li>Future Baseline (which includes completed WEG Blocks A to F and 14-17 PG Blocks G + H massing and occupied) + Proposed Development; and</li><li>Future Baseline (which includes completed WEG Blocks A to F and 14-17 PG Blocks G + H massing and occupied) + Proposed Development + Cumulative Development.</li></ul>
5	Section 3.6.2.	It is clearly stated that within ES Volume 1, Chapter 5: Demolition and Construction Description a framework CEMP will be provided, and measures included within the framework CEMP will be considered as mitigation embedded into the Proposed Development. This provides partial clarification in relation to the comments / observations raised in relation to Section 3.3. However, will the same approach be applied to legislative controls and other standard tried and tested sectorial mitigation?	Clarification is required in respect of how legislative requirements and standard tried and tested sectorial mitigation will be applied and considered as part of the EIA process.	Please see above (point 3)
6	Section 3.6.4.	In describing the approach to be employed with regard to the assessment of inter-project cumulative effects, it is stated: <i>"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."</i>  EIA at the reserved matters application stage is intended to identify the likely significant environmental effects of a project which were not or could not be assessed at the outline planning application stage. Accordingly, any EIA work undertaken at the reserved matters	It is noted that the list of cumulative schemes included within Appendix I of the Ramboll EIA Scoping Opinion Request Report does not include for any outline planning applications which have been subject to subsequent reserved matters applications. As such, the comments / observations made in relation to Section 3.6.4 are a moot point.  Despite the above, it is acknowledged that the list of cumulative schemes will be continually reviewed up until submission of the planning application which may necessitate the inclusion of further	<p>It is agreed that none of the cumulative schemes include an outline planning application.</p> <p>In response to the request for clarification, the lack of information at outline planning stage should not be used as a reason to defer assessment to the reserved matters stage. Where information is not available, reasonable assumptions should be made as a basis for assessment. Therefore, Ramboll maintains that outline applications would typically present the worst-case in respect of assessed environmental effects.</p> <p>Specialists would consider <b>both</b> the reserved matters and the outline applications to establish which represents the worst-case scenario on a topic-by-topic basis. Reference</p>

No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
		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.  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.	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.	to the outline scheme is particularly relevant in instances where a number of valid but unimplemented permissions were live for any given cumulative site.
7	Section 3.6.4 and Appendix I.	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.  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	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.	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.

No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
		application reference 19/03673/FULL). The detailed planning application received a resolution to grant planning permission at the end of October 2020.		
8	Section 5.	In describing the emerging proposed Development, reference is made to the provision of “... <i>approximately 8,250 sqm Gross External Area (GEA) of flexible commercial floorspace (class E)</i> ”.  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.	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.	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.  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.
9	Section 6.1.2.	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 “... <i>neighbourhood and local authority</i> ...” level. However, further on in Section 6.1.2 of the Ramboll EIA Scoping Opinion Request Report, it is stated “... <i>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</i> ”. This implies that the assessment of housing delivery	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.  Clarification is required regarding the intended methodology to be employed to derive the likely number of construction employees.  Clarification is required as to whether the assessment of completed and operational jobs will focus on net employees.	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.  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).



No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
		would be undertaken at a local authority and Regional (London wide) level.  The intended methodology to derive the likely number of construction employees associated with the works required to facilitate the Proposed Development is unclear.  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.		It is stated within the Ramboll EIA Scoping Opinion Request Report that the likely number of construction employees " <i>will be assessed using the latest published results in the Annual Business Survey</i> ". 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.  As stated within the Ramboll EIA Scoping Opinion Request Report both the " <i>gross employment as well as net additional above any existing employment levels on-site</i> " will be considered. The net employee calculation will be established in accordance with the Additionality Guide.
10	Section 6.2.	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.  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	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.	The likely peak and daily (based on an average weekday) traffic volumes and flows associated with the Proposed Development are detailed in point 18.  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.  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.

No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
		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).  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.		<b>Proposed Development – Completed and Operational</b>  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.  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: <ul style="list-style-type: none"><li>• Basement access at Church Street: 90 AADT;</li><li>• Church Street east of site basement access: 96 AADT;</li><li>• Church Street west of site basement access: 73 AADT;</li><li>• Newcastle Place: 55 AADT;</li><li>• Paddington Green north of Newcastle Place: 73 AADT</li><li>• Harrow Road: 74 AADT; and</li><li>• Edgware Road south Church Street: 51 AADT.</li></ul> 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.

No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
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.

No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
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>



No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
				<p>The noise and vibration assessment will consider:</p> <ul style="list-style-type: none"><li>• Demolition and construction effects on existing and future NSRs;</li><li>• Completed development effects on existing NSRs in respect of plant noise; and</li><li>• Completed development effect on future NSRs in respect of site suitability (including vibration, plant noise and traffic noise).</li></ul>
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"><li>• The current status of the WEG scheme.</li><li>• When the WEG scheme is anticipated to be fully completed and operational.</li><li>• How the above WEG scheme milestone dates relate to the envisaged implementation programme for the Proposed Development.</li></ul>	<p>Clarification is required regarding:</p> <ul style="list-style-type: none"><li>• The current status of the WEG scheme.</li><li>• When the WEG scheme is anticipated to be fully completed and operational.</li><li>• How the above WEG scheme milestone dates relate to the envisaged implementation programme for the Proposed Development.</li></ul> <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>As clarified above (see point 4)</p>

No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
16	Section 6.5.2.	<p>Within the intended scope of the daylight, 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"><li>• The current status of the WEG scheme.</li><li>• When the WEG scheme is anticipated to be fully completed and operational.</li><li>• How the above WEG scheme milestone dates relate to the envisaged implementation programme for the Proposed Development.</li><li>• What is meant by Blocks B and H of the 14 – 17 Paddington Green 'overlapping' with the WEG scheme.</li></ul>	<p>Clarification is required regarding:</p> <ul style="list-style-type: none"><li>• The current status of the WEG scheme.</li><li>• When the WEG scheme is anticipated to be fully completed and operational.</li><li>• How the above WEG scheme milestone dates relate to the envisaged implementation programme for the Proposed Development.</li></ul> <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>

No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
		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.		
18	Section 7.1.	<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><b>Baseline, Future Baseline and Cumulative Traffic Flows</b></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"><li>• Edgware Road: Peak hours around 1,500 to 1,700, and daily flows around 31,100.</li><li>• Church Street: Peak hours around 150 to 200, daily flows around 2,500.</li><li>• Paddington Green: Peak hours around 100 to 120, daily flows around 1,500.</li></ul> <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>

No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
		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><b>Demolition and Construction Stage Traffic</b></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 thought the CEMP and Construction Logistics Plan (CLP). Accordingly, no significant traffic and transport effects are expected during demolition and construction.</p> <p><b>Proposed Development - Completed Development Stage Traffic</b></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><b>Car drivers (use Church Street to access basement):</b></p> <ul style="list-style-type: none"><li>• AM Peak: 3 arrival, 10 departure</li><li>• PM Peak: 7 arrival, 4 departure</li></ul>

No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
				<ul style="list-style-type: none"><li>Weekday: 40 vehicles two-way</li></ul> <b>Taxis (use one-way Newcastle Place):</b> <ul style="list-style-type: none"><li>AM Peak: 2 vehicles one-way</li><li>PM Peak: 2 vehicles one-way</li><li>Weekday: 12 vehicles one-way</li></ul> <b>Servicing (residential deliveries use one-way Newcastle Place, commercial deliveries use Church Street to access basement):</b> <ul style="list-style-type: none"><li>AM Peak: 3 vehicles on Newcastle Place, 6 vehicles on Church Street</li><li>PM Peak: 3 vehicles on Newcastle Place, 1 vehicle on Church Street</li><li>Weekday: 51 vehicles on Newcastle Place, 31 vehicles on Church Street</li></ul> <b>Total</b> <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>

No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
				<b>Summary</b> <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>
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 <b>Appendix I</b>). 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>Please see the comments at Point 1</p>



No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
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.

No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
		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 <b>Appendix I</b> ). Thames Water's comments do not change the intended scope of the ES with respect to water resources and flood risk.	strategy and other 'embedded' design features which would achieve sustainable water usage etc.	
22	Section 7.5.	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"><li>• 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.</li><li>• 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</li></ul> 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

No	Reference within the Ramboll EIA Scoping Opinion Request Report	Independent Review Comment(s) / Observation(s)	Additional Information / Clarification Request	Applicant's Response
				increase in length to between 30 m - 45 m below the ground surface.  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.  Detailed information on basement and foundation design will be robustly assessed for their impact against baseline conditions in the proposed Archaeological Desk-based Assessment.
23	Section 7.9.	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.	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.	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.

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.	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.	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.	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.  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.
25	Section 8.	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.	Refer to all of the above.	Understood. Please see the above comments/responses.
26	Appendix I.	Refer to commentary provided in relation to Section 3.6.4.	Refer to commentary provided in relation to Section 3.6.4.	Please see comments Point 6



## 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

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## Appendix IV The 13<sup>th</sup> January 2021 Email