

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

Hi Ben, Michelle,

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

1. Based upon the contents of the Applicant's 'EIA Scoping Opinion Request Report' (September 2020) ('the September 2020 EIA Scoping Opinion Request') and the responses provided to Avison Young's 'Independent Review of the Environmental Impact Assessment (EIA) Scoping Opinion Request Report' (December 2020) ('the December 2020 Response to the EIA Scoping Opinion Request Review') subject to the points and required actions / further clarification request below, I am satisfied that intended scope of the forthcoming ES is appropriate.
2. With reference to **item 10** in the December 2020 Response to the EIA Scoping Opinion Request Review, it is clear that the anticipated vehicular traffic arising from the Proposed Development would not give rise to significant air quality effects. Acknowledging that the traffic data does not represent that of a final and fixed Proposed Development, it is requested that the validity of the traffic data already presented is cross-checked and validated with final and fixed Proposed Development traffic flows (including for relevant Cumulative Schemes). Should this exercise continue to demonstrate no significant air quality effects would arise from the final and fixed Proposed Development then this should be explained / evidenced in the forthcoming ES and it would remain appropriate to scope this component of assessment out of the ES. If, however, this is not the case, then an appropriate assessment of completed and operational Proposed Development road traffic emissions (including for relevant Cumulative Schemes) will be required for inclusion with the ES. It is acknowledged that this latter scenario is unlikely.
3. With reference to **item 11** in the December 2020 Response to the EIA Scoping Opinion Request Review, whilst the WEG Energy Centre may have the existing capacity to service the Proposed Development, it still remains unclear whether the new and additional land uses associated with the completed and operational Proposed Development to be 'plugged into' the WEG Energy Centre would give rise to increased emissions to ambient air quality and therefore give rise to significant air quality effects.

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

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

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

4. With reference to **item 18** in the December 2020 Response to the EIA Scoping Opinion Request Review, once again, it is clear that the anticipated vehicular traffic arising from the Proposed Development would not give rise to significant transport and traffic (environmental) effects. Acknowledging that the traffic data does not represent that of a final and fixed Proposed Development, it is requested that the validity of the traffic data already presented is cross-checked and validated with final and fixed Proposed Development traffic flows (including for relevant Cumulative Schemes). Should this exercise continue to demonstrate no significant transport and traffic (environmental) effects would arise from the final and fixed Proposed Development then this should be explained / evidenced in the forthcoming ES and it would remain appropriate to scope this component of assessment out of the ES. If, however, this is not the case, then an appropriate assessment of transport and traffic (environmental effects) will be required for inclusion with the ES. It is acknowledged that this latter scenario is unlikely.

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

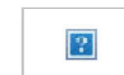
Any questions, please do feel free to call.

Best regards,

Hannah.

Hannah Fiszpan
Director, Environmental Planning

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



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Appendix V
The Second Ramboll Response

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

External Sender

Dear Hannah
Apologies for the delay.

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

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

Kind regards and take care
Michelle and Ben

Kind regards
Michelle Wheeler

Senior Managing Consultant
1702706 - London

—

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

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

Hi Ben, Michelle,

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

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

would not give rise to significant air quality effects. Acknowledging that the traffic data does not represent that of a final and fixed Proposed Development, it is requested that the validity of the traffic data already presented is cross-checked and validated with final and fixed Proposed Development traffic flows (including for relevant Cumulative Schemes). Should this exercise continue to demonstrate no significant air quality effects would arise from the final and fixed Proposed Development then this should be explained / evidenced in the forthcoming ES and it would remain appropriate to scope this component of assessment out of the ES. If, however, this is not the case, then an appropriate assessment of completed and operational Proposed Development road traffic emissions (including for relevant Cumulative Schemes) will be required for inclusion with the ES. It is acknowledged that this latter scenario is unlikely.

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

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

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

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

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

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

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

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

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

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

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

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

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

4. With reference to **item 18** in the December 2020 Response to the EIA Scoping Opinion Request Review, once again, it is clear that the anticipated vehicular traffic arising from the Proposed Development would not give rise to significant transport and traffic (environmental) effects. Acknowledging that the traffic data does not represent that of a final and fixed Proposed Development, it is requested that the validity of the traffic data already presented is cross-checked and validated with final and fixed Proposed Development traffic flows (including for relevant Cumulative Schemes). Should this exercise continue to demonstrate no significant transport and traffic (environmental) effects would arise from the final and fixed Proposed Development then this should be explained / evidenced in the forthcoming ES and it would remain appropriate to scope this component of assessment out of the ES. If, however, this is not the case, then an appropriate assessment of transport and traffic (environmental effects) will be required for inclusion with the ES. It is acknowledged that this latter scenario is unlikely.

Please see point 2. above.

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

Any questions, please do feel free to call.

Best regards,

Hannah.

Hannah Fiszpan
Director, Environmental Planning

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65 Gresham Street, London, EC2V 7NQ



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Technical Appendix 2.3: EIA Scoping Opinion



Your ref:
My ref: 20/05827/EIASCO

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

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

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

Date: 25 March 2021

Dear Sir,

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

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

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

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

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

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

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

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

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

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

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

Yours faithfully

Deirdra Armsby
Director of Place Shaping and Town Planning

Item No.

Item No.

Delegated Report Development Planning

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

Case No.:	20/05827/EIASCO	TP:	
Date Received:	17.09.2020	Date Valid:	17.09.2020
Date amended/ completed:	17.09.2020	8 Wk Date:	15.10.2020
		EoT date:	
Agent:	Laurence Brooker / Turley	On behalf of:	
Development Plan Context:	- London Plan March 2021 - Westminster's City Plan November 2016 - Unitary Development Plan (UDP) January 2007 - City Plan 2019-2040 Intend to Adopt version		

LB: **CA:**

Proposal:

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

Consultations:

NATURAL ENGLAND

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

ENVIRONMENT AGENCY

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

GREATER LONDON AUTHORITY

No response received.

TRANSPORT FOR LONDON

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

THAMES WATER

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

HISTORIC ENGLAND

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

HISTORIC ENGLAND ARCHAEOLOGY

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

ENVIRONMENTAL HEALTH OFFICER

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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part of the assessment process.

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

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

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

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

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

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

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

BUILDING CONTROL
No response received.

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

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

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

HIGHWAYS PLANNING MANAGER
No response received.

LEAD LOCAL FLOOD AUTHORITY
No response received.

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PLACESHAPING TEAM

No response received.

Relevant Planning History:

None.

Considerations:

APPLICATION SITE

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

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

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

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

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

PROPOSED DEVELOPMENT

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

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

The proposed land uses are likely to comprise:

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

Item No.

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

No drawings of the proposed development have been submitted.

LEGISLATIVE CONTEXT

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

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

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

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

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

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

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

ASSESSMENT

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

The applicant proposes scoping in the following topics:

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

The applicant proposes scoping out the following topics:

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

DRAFT DECISION LETTER

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

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

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

CONCLUSION

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

Recommendation:

Adopt scoping opinion that:

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

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

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

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

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

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

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

Reason:
See decision letter.

Item No.

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



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

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

T 0300 060 3900

BY EMAIL ONLY

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

Yours sincerely

Sally Ireland
Consultations Team

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

Hi Nathan,

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

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

Kind regards

Chloe Flower

Area Planner (West) | Spatial Planning

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

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

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

Sent: 12 March 2021 10:20

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

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

Importance: High

Hi Chloe,

Hope you are well.

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

Kind Regards

Nathan Barrett

Area Planning Officer - North Team

Place Shaping and Town Planning - Growth, Planning and Housing

Westminster City Council

PO Box 732

Redhill

RH1 9FL

Tel: 078 6603 6771 (Please note new number)

westminster.gov.uk



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

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

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

Westminster City Council switchboard: +44 20 7641 6000.

www.westminster.gov.uk

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

City of Westminster	Our DTS Ref: 60044
Department of Planning & City Development	Your Ref: 20/05827/EIASCO
Westminster City Hall	
64 Victoria Street	
London	
SW1E 6QP	

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

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

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

Direct Dial: 020 7973 3712

Our ref: PL00717002

3 October 2020

Dear Mr Barrett

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

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

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

Yours sincerely,

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

CITY OF WESTMINSTER MEMORANDUM

1

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

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

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

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

Section 3.2.1 Existing and Future Baselines

It has been stated that,

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

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

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

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



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

Telephone 020 7973 3700
HistoricEngland.org.uk



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

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

Section 5 Proposed Development

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

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

For example:

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

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

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

Section 6.2 Air Quality

Demolition and construction

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

Impact to future receptors (site suitability)

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

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

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

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

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

Impacts to existing receptors operation impacts

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

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

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

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

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

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

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

Air Quality Neutral Assessment

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

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

Noise and Vibration

the following impacts have been scoped into the EIA

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

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

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

Section 6.3

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

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

Baseline Characterisation

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

Impacts

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

Mitigation Overheating

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

Contamination

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

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