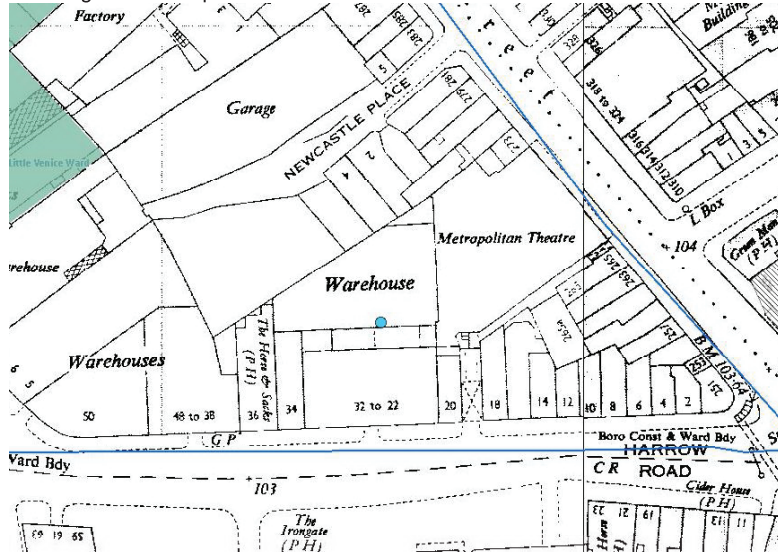


following historic map.



Communal open spaces, residential development and sensitive uses are proposed under Class E therefore I recommend that contamination is scoped into the impact assessment.

Should you wish to discuss any of my comments please contact me directly

Gavin McIntosh
Senior Practitioner

6



City of Westminster

INTERNAL MEMORANDUM

To: Nathan Barrett, Development Planning
From: Saeed Oluwadipe, Projects Officer (Waste), Highways Planning
Tel: 7962
Date: 23 January 2020
Ref: 20/05827/EIASCO
Subject: Paddington Green Police Station, 4 Harrow Road, London, W2 1XJ

This application is for Environmental Impact Assessment – Scoping Report for the 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.

The scoping report identifies the potential significant environmental effects likely to occur due to the proposed development and the potential non-significant environmental impact and effects.

In view of the above, applicant has affirmed that the Proposed Development Description 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 the 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. Applicant needs to take into consideration two important issues when designing the waste strategy for operational phase.

- No chute should be proposed as part of the strategy to collect waste and recyclables as the use 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.

Therefore, the applicant in planning for the waste management strategy for the operational phase should have regards to the following planning documents:

Policy ENV 12: Waste and Recycling Storage of the Westminster's Unitary Development Plan (UDP) approved on 24 January 2007.
The City of Westminster Recycling and Waste Storage Requirements updated 15 January 2019.

Technical Appendix 2.3(N): Avison Young Independent Environmental Statement Review



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avisonyoung.co.uk



Our Ref: 210803 WCC Final ES Review Advice (SR)
Your Ref:

3 August 2021

Nathan Barratt
Westminster City Council

By Email Only

Dear Nathan,

Paddington Green Police Station, London: Independent Review of the Environmental Statement

In May 2021 Avison Young was commissioned to undertake an independent review of the Paddington Green Police Station Environmental Statement (ES) (Ramboll, March 2021). This review was carried out and an Independent ES Review Report was prepared and issued to Ramboll on 2 June 2021. The report outlined a number of points of clarification required from Ramboll in order to inform Avison Young's final advice to Westminster City Council (WCC) on the adequacy of the ES.

Further to the issuing of the Independent ES Review Report to Ramboll on 2 June 2021, Ramboll provided their response to the clarifications and queries raised on 26th June 2021. A copy of the Ramboll response to the Independent ES Review Report is enclosed. Avison Young have reviewed the response received from Ramboll and discussed with Nathan Barratt at WCC and subsequently with Michelle Wheeler and Ben Seward at Ramboll to ensure Avison Young's understanding of the Ramboll response. With reference to the Ramboll response enclosed, Avison Young's findings and final advice on the adequacy of the ES is provided below.

Independent Review of ES Volume 1: Chapters 1 to 5

All responses in respect of Chapters 1 to 5 are noted and accepted and no further information is required.

Independent Review of ES Volume 1: Chapter 6: Socio-Economics

No. 6.5 - Assessment of Completed Development Effects: Open Space: Para 6.123 to 6.126

The Ramboll response does not fully answer the precise query raised. Nevertheless, the overall outcome of the assessment is accepted and it is considered that WCC have sufficient information to inform their decision on the planning application with respect to this matter. As such, no further information is required.

No. 6.6 - Assessment of Completed Development Effects: Play Space: Para 6.127 to 6.131

The Ramboll response does not fully answer the precise query raised. Nevertheless, the overall outcome of the assessment is accepted and it is considered that WCC have sufficient information



to inform their decision on the planning application with respect to this matter. As such, no further information is required.

All other responses in respect of Chapter 6: Socio-economics are noted and accepted with no further information required.

Independent Review of ES Volume 1: Chapter 7: Air Quality

All responses in respect of Chapter 7: Air Quality are noted and accepted and no further information is required.

The WCC Environmental Health Officer should be made aware of the Ramboll response to Query No. 7.1 which should now provide a satisfactory response/explanation.

Independent Review of ES Volume 1: Chapter 8: Noise and Vibration

All responses in respect of Chapter 8: Noise and Vibration are noted and accepted and no further information is required.

Independent Review of ES Volume 1: Chapter 9: Wind Microclimate

No. 9.1 - Assessment Scope: Configurations Assessed: Para 9.18

The Ramboll response does not fully answer the precise query raised. It remains unclear why the existing conditions has been reported on rather than the 'future baseline' conditions given that these conditions are considered more realistic of the area of the Site at the time the proposed development is completed. Notwithstanding this, it is acknowledged that the assessment methodology for the Completed Development scenario involves a comparison of the wind conditions prevailing once the Proposed Development is completed with the intended use of the various locations both within the Site and off-Site. As such, given that the 'future baseline' is included with the Proposed Development in Configurations 2, 3 and 4, it is considered that the results of the assessment can be relied on and that the likely significant Wind Microclimate effects have been reported within the ES. It is, therefore, considered that WCC have sufficient information to inform their decision on the planning application with respect to this matter. As such, no further information is required.

No. 9.2 - Mitigation: Para 9.127

The Ramboll response provides suitable clarification on this point although it should be noted that if landscaping presented in Drawing 1446-013E is a key component of the Proposed Development and an important embedded mitigation measure then inclusion of the drawing within the ES would have been helpful to the reader. WCC to note that the Applicant is happy to accept the imposition of an appropriately worded planning condition in this respect i.e. landscaping as presented in Drawing 1446-013E should be provided in the area of each building prior to the occupation of that building.

All other responses in respect of Chapter 9: Wind Microclimate are noted and accepted and no further information is required.

Independent Review of ES Volume 1: Chapter 10: Daylight, Sunlight, Overshadowing and Solar Glare

No. 10.1 - Consultation: Table 10.1

The Ramboll response does not fully answer the precise query raised. Indeed, the response confirms the observations made by Avison Young. During the discussion held between Avison Young and Ramboll, confirmation was provided that the assessment of daylight effects had been informed by significance criteria which was based on BRE Guidance rather than local context criteria, albeit qualitative reference to the local context study provided in Appendix 10.8 is made. During the discussion Ramboll commented that the assessment had been completed in line with the latest EIA Screening Opinion which did not formally request that local context daylight levels should be used to determine the significance of effects. This isn't relevant here as points of assessment methodology are discussed and agreed outside of a formal scoping process and, furthermore, this doesn't prevent the ability of the Local Planning Authority to request further environmental information in any event. Notwithstanding this, the Ramboll EIA Scoping Report does appear to say that the local context daylight and sunlight levels would be considered before the overall significance is determined for a building (text from Pages 37/38 of the EIA Scoping Report refer). As such, it is considered reasonable to expect that the assessment would have used local context criteria as part of the evaluation of effects and determination of significance.

Notwithstanding the above, it is accepted that all of the relevant information with regard to daylight effects is contained within the ES; what hasn't been reported is the final step of assessing the effect of the proposed development on daylight levels experienced by existing receptors using the local context benchmark of 11% rather than 27%. However, the qualitative explanation of daylight levels compared with the local context levels is provided. It could therefore be argued that the assessment is a robust worst case assessment and the planning application can be considered and determined on that basis. Further communication with WCC has established that this approach is satisfactory to them. It is, therefore, considered that WCC have sufficient information to inform their decision on the planning application with respect to this matter and, as such, no further information is required.

10.2 – Assessment Scope: 10.17 to 10.18 and 10.5 – Future Baseline (Scenario 2a vs Scenario 2b)

The Ramboll response does not fully answer the precise queries raised as no explanation is provided for the presentation of unnecessary assessment scenarios. Notwithstanding this, assessment of the relevant and appropriate scenarios has been undertaken and is reported within the ES. It is considered that WCC have sufficient information to inform their decision on the planning application with respect to this matter. As such, no further information is required.

However, it is important to note that the relevant assessment results are not always clearly reported within the sub-section expected based on the sub-section headings. The assessment of daylight, sunlight and overshadowing effects for the future baseline scenario is reported partly within the subsection titled 'Existing Baseline (Scenario 1a vs Scenario 1b)' as well as within the sub-section titled 'Future Baseline (Scenario 2a vs Scenario 2b)'. When reviewing the results of the assessment it will therefore be important for WCC to ensure the correct results for each receptor assessed is considered, bearing this in mind.

All other responses in respect of Chapter 10: Daylight, Sunlight, Overshadowing and Solar Glare are noted and accepted with no further information required. WCC to note the clarification provided in respect of Query 10.3.

Independent Review of ES Volume 1: Chapter 11: Cumulative Effects

No comments and no further information is required.

Independent Review of ES Volume 1: Chapter 12: Residual Effects

No comments and no further information is required.

Independent Review of ES Volume 2: Townscape, Visual and Built Heritage Impact Assessment

No. 2.3 - Assessment of Cumulative Townscape Effects: 7.56

The Ramboll response confirms that the approach to the cumulative assessment of townscape effects was to consider the additive effects rather than the cumulative effects. Although taking different approaches to cumulative assessment for different topic assessments is not ideal, it is acceptable, and it is considered that WCC have sufficient information to inform their decision on the planning application with respect to this matter. As such, no further information is required.

No. 2.4 – Visual Assessment: 8.2

The Ramboll response does not fully answer the precise query raised. It remains unclear why the existing conditions have been shown in visualisations rather than the 'future baseline' conditions given that these conditions are considered more realistic of the area of the Site at the time the proposed development is completed. Notwithstanding this, the visualisations showing the proposed development do show the West End Gate and 14-17 Paddington Green schemes in wireline, so it is possible to view the future baseline and proposed development together and understand the relevant visual effects resulting from the proposed development, aided by the accompanying text. It is, therefore, considered that WCC have sufficient information to inform their decision on the planning application with respect to this matter. On this basis, the information provided is acceptable and no further information is required.

All other responses in respect of ES Volume 2: Townscape, Visual and Built Heritage Impact Assessment are noted and accepted with no further information required.

Independent Review of the Non-Technical Summary

No comments and no further information is required.

Concluding Remarks

In concluding, it is considered that the Ramboll ES dated March 2021 along with the enclosed clarifications to the Avison Young queries provided by Ramboll on 26th June 2021 comprise satisfactory information sufficient to inform WCC's decision on the planning application and no further environmental information is required to be submitted. Specifically, no further environmental information needs to be requested in line with Regulation 25 of the EIA Regulations. WCC should note Ramboll's enclosed response to the Avison Young queries raised, particularly, those clarifications relating to the securing of planning conditions to ensure adequate mitigation is implemented.



Independent Environmental Statement Review Report

Paddington Green Police Station, London

June 2021

Client Name: Westminster City Council

Report Title: Independent Environmental Statement Review Report – Paddington Green Police Station, London

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Prepared By: Suzanne Roberts and Hannah Fiszpan

Status: Second Issue

Date: 2 June 2021

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 The Applicant's proposals (the 'Proposed Development') comprises:
- "Demolition and redevelopment of the site to provide three buildings, providing private and affordable residential units (Class C3), commercial uses (Class E), flexible community/affordable workspace (Class E/F.1), provision of private and public amenity space, landscaping, tree and other planting, public realm improvements throughout the site including new pedestrian and cycle links, provision of public art and play space, basement level excavation to provide associated plant, servicing and disabled car and cycle parking, connecting through to the basement of the neighbouring West End Gate development."*
- 1.3 Under the Town and Country Planning (Environmental Impact Assessment) Regulations, 2017 (as amended) (the 'EIA Regulations'), the Proposed 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) which was submitted alongside the planning application.
- 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 ES will be compliant with the requirements of the EIA Regulations, current EIA best practice and relevant EIA case law.
- 1.5 In accordance with Regulation 4 (5) of the EIA Regulations, WCC (as the local planning authority) wish to ensure "...they have, or have access as necessary to, sufficient expertise to examine the ES...". As such, Avison Young were appointed to assist WCC in ensuring that the ES is compliant with the requirements of the EIA Regulations, current EIA best practice and relevant EIA case law.
- 1.6 Avison Young is registered with the Institute of Environmental Management and Assessment (IEMA) on the EIA Quality Mark scheme. We have secured the Quality Mark in relation to our technical work, staff, innovation and promotion of EIA within the industry.
- 1.7 The review presented in this Report has been carried out by Hannah Fiszpan (Director) and Suzanne Roberts (Associate Director) at Avison Young.



- 1.8 Hannah has 20 years' experience within the environmental assessment and environmental planning sector. Her particular expertise includes: the provision of environmental constraints and opportunities planning at the site feasibility and master-planning stages of projects; the formulation and provision of strategic environmental planning advice for complex situations at all stages of the development life-cycle; and all matters relating to EIA.
- 1.9 Suzanne has 20 years' experience delivering environmental planning services predominantly for private sector clients and involving mixed use urban redevelopment projects. Suzanne has experience with all matters related to the EIA process, including: EIA screening; EIA scoping; the provision of iterative environmental design advice; EIA co-ordination and ES preparation; and post-submission matters (including dealing with environmental related planning conditions and obligations).

2. Approach and Methodology

- 2.1 This Report sets out the outcome of Avison Young’s review of the ES submitted alongside the Paddington Green Police Station Application (WCC planning reference: 21/02193/FULL).
- 2.2 The primary purpose of the review is to advise WCC, as the local planning authority, whether the ES is compliant with the requirements of the EIA Regulations. The EIA Regulations establish the minimum information to be supplied by an applicant within an ES, as well as information that the local planning authority can request as being reasonably justified given the circumstances of the case.
- 2.3 Under the EIA Regulations, where an ES is deemed not to be complete, Regulation 25 of the EIA Regulations makes provision for a request to be issued to the applicant for further environmental information. This Report therefore considers whether the ES is complete and / or identifies areas where clarifications or further information may be required under Regulation 25 of the EIA Regulations to make the ES complete. Should further environmental information be requested, this should be subject to the same publicity requirements as the submitted ES.
- 2.4 This Report also provides comments / observations on matters of clarification to assist with decision-making. The review has objectively evaluated the information contained within the ES, the methodologies employed and the resultant conclusions drawn in terms of relevant legislation and guidelines to ensure that WCC has been provided with the appropriate level of information on which to make a planning decision.
- 2.5 A review was undertaken of the following EIA-related documents:
- EIA Scoping Request, prepared by Ramboll dated 17th September 2020.
 - EIA Scoping Opinion Advice Note, prepared by Avison Young dated 3rd February 2021.
 - EIA Scoping Opinion, issued by WCC dated 25th March 2021.
 - ES, prepared by Ramboll and a number of technical consultants dated March 2021, comprising:
 - ES Volume 1: Main ES.
 - ES Volume 2: Townscape, Visual and Built Heritage Impact Assessment.
 - ES Volume 3: Technical Appendices.
 - Non-Technical Summary.
- 2.6 As part of the review, the following were considered:
- Whether the scope of the ES meets the requirements of EIA Scoping Request, the EIA Scoping Opinion, the EIA Regulations and current best practice.

- The competency of ES authors and contributors.
 - The appropriateness of methodologies used to identify the likely significant environmental effects of the Development.
 - The validity of survey data relied upon to inform the technical assessments included within the ES.
 - The appropriateness and likely effectiveness of mitigation and whether embedded mitigation measures relied upon are evidenced and secured.
 - Whether the assessment findings are justified and reasonable.
- 2.7 In view of the above:
- **Section 3** provides key comments and observations of Avison Young in respect to the scope of the EIA and resultant ES.
 - **Section 4** provides the key comments and observations of Avison Young in respect to Chapters 1-5 (the introductory chapters) of Volume 1: Main ES (and associated Appendices).
 - **Section 5** provides the key comments and observations of Avison Young in respect to Chapters 6 – 12 (the technical chapters) of Volume 1: Main ES (and associated Appendices).
 - **Section 6** provides the key comments and observations of Avison Young in respect to Volume 2: Townscape, Visual and Built Heritage Impact Assessment.
 - **Section 7** provides the key comments and observations of Avison Young in respect to the Non-Technical Summary.
- 2.8 Comment / observations are not typically made where information is found to be acceptable or compliant. Instead, the Report focuses on the key comments / observations in respect to the information provided and where clarifications or further information under Regulation 25 of the EIA Regulations may be required from the Applicants.
- 2.9 An empty column has been included within the tables within each of the above sections so that the Applicants can easily provide responses.
- 2.10 It should be noted that where a key comment / observation relates to multiple sections / paragraphs within a particular chapter or volume of the ES, the comment / observation has only been made in relation to the first relevant section / paragraph rather than being repeated in relation to all relevant sections / paragraphs throughout the chapter or volume of the ES.
- 2.11 To assist with the Applicants’ response, within **Sections 4 to 7** a Red / Amber / Green (RAG) rating has been attributed to each of the points to determine their priority and aid with understanding the key matters requiring clarification and / or further information.

- 2.12 Where key mitigation measures are noted that should be secured by a planning condition / legal agreement, these are also noted in **Sections 4 to 7**.
- 2.13 **Section 8** of this Report sets out the next steps. Where information is provided pursuant to the clarifications and / or further information requested, this will be reviewed by WCC and Avison Young and used to draw final conclusions on the adequacy of the ES.

3. Independent Review of the Scope of the EIA

Overview

- 3.1 On behalf of the Applicants, Ramboll submitted a Request for an EIA Scoping Opinion and accompanying EIA Scoping Request in line with Regulation 15 of the EIA Regulations to WCC on 17th September 2020.
- 3.2 Avison Young were appointed to assist WCC in reviewing the EIA Scoping Request. The findings of the review were reported in a document entitled 'Independent Review of the Environmental Impact Assessment Scoping Request' dated 9th November 2020, which was issued to Ramboll. The Independent Review of the EIA Scoping Request contained clarifications and requests for additional information in line with Regulation 15 (3) of the EIA Regulations.
- 3.3 In response to the Independent Review of the EIA Scoping Request, additional information and various clarifications were submitted by Ramboll on 15th December 2020 (the First Ramboll Response). Following a review of the Ramboll Response, a meeting between Avison Young and Ramboll was held on 13th January 2021. Ramboll then provided a second response on the 2nd February 2021 to queries raised at the meeting (the Second Ramboll Response).
- 3.4 The above was collated by WCC and informed, alongside consultee responses, the EIA Scoping Opinion dated 25th March 2021.

EIA Scoping

- 3.5 The EIA scoping process concluded that the following environmental topics would be scoped into the EIA:
- Socio Economics.
 - Air Quality.
 - Noise and Vibration.
 - Wind Microclimate.
 - Daylight, Sunlight and Overshadowing.
 - Townscape Visual and Built Heritage.
- 3.6 The EIA scoping process concluded that the following environmental topics should be scoped out from the EIA on the basis that significant effects were unlikely to arise from the Proposed Development:
- Ecology;
 - Contamination;

- Archaeology;
- Water Resources and Flood Risk;
- Transport and Accessibility;
- Telecommunication Interference;
- Light Spill;
- Waste;
- Climate;
- Major Accidents and Disasters; and
- Human Health.

3.7 The above was formalised in the EIA Scoping Opinion dated 25th March 2021.

Compliance with the EIA Scoping Opinion

- 3.8 Regulation 18 (4)(a) of the EIA Regulations requires an ES to be based on the most recent EIA Scoping Opinion or Direction issued.
- 3.9 Given the above, having reviewed the technical scope of the ES, Avison Young are satisfied that the ES is based on the scope set out in the EIA Scoping Opinion dated 25th March 2021, which represent the most recent EIA Scoping Opinion. However, note the query raised in **Section 7** below on the Townscape, Visual and Built Heritage Impact Assessment.

4. Independent Review of Volume 1: Main ES (Chapters 1 - 5)

Table 1: Independent Review of Volume 1: Main ES (Chapters 1 - 5)

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
Chapter 1: Introduction					
1.1	Project Team: 1.64 and Table 1.2.	Table 1.2 presents the EIA team and associated appendix provides evidence of the competency of the EIA team, ES authors and contributors. The information provided is deemed satisfactory to provide evidence of EIA team competency.		N/A	N/A
Chapter 2: EIA Process and Methodology					
2.1	EIA Scoping	As detailed in Section 3 above, the ES is based on the scope set out in the EIA Scoping Opinion dated 25th March 2021, which represents the most recent EIA Scoping Opinion. However, note the query raised in Section 7 below on the Townscape, Visual and Built Heritage Impact Assessment.		N/A	N/A
2.2	Future Baseline: 2.52	Paragraph 2.52 states that assessments of socio-economics effects, air quality effects and noise and vibration effects are undertaken against a future baseline. There is no mention of the assessments of wind microclimate effects and daylight, sunlight, overshadowing effects and the interaction of effects but these would also need to be undertaken against a future baseline.		Please clarify why only assessments of socio-economics effects, air quality effects and noise and vibration effects are mentioned here and what the situation is for the other assessments in terms of a future baseline and assessment of scenarios.	To clarify, socio-economics, air quality, noise and vibration assess the proposed development against future baseline conditions, whereas wind microclimate and daylight, sunlight, overshadowing assess the proposed development against both the existing and future baseline conditions. As stated in paragraph 2.2 and a couple of other paragraphs, Chapter 2 provides an overarching summary of the EIA approach, with more detail provided in each technical ES chapter. It is considered that the technical assessments are very clear in respect of the existing and future baseline scenarios that have been assessed.

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
2.3	Assessment Scenarios	Paragraph 2.54 to 2.57 sets out the 'Assessment Scenarios' including 'Future Baseline'. It is noteworthy here that Scenario 2 is stated as the Future Baseline scenario against which the effects of the completed development is to be assessed i.e. the 'do nothing' scenario.		N/A	<p>To clarify, the reference to 'do nothing' in the second bullet point at paragraph 2.57 refers to off-site conditions at a defined future point in time and should not be confused with the 'Do Nothing' scenario conventionally considered in EIA.</p> <p>The 'Do Nothing' Scenario is a hypothetical alternative scenario required to be considered by the EIA Regulations in the event that the development does not come forward on-site, with the existing on-site development remaining in place.</p> <p>The 'Do Nothing' Scenario is discussed in ES Chapter 3: Alternatives and Design Evolution as a basis for comparing (not assessing) the development proposal under consideration.</p> <p>Scenario 2 represents a specific point in the future when the proposed development is programmed/ anticipated to be completed on-site and becomes fully occupied and operational introducing new receptors to the site.</p>
2.4	Mitigation: 2.61	Paragraph 2.61: It is unclear what is meant here by "in all cases, mitigation measures are presented as embedded". This first sentence seems to contradict the previous Paragraph. If measures are embedded i.e. they are primary mitigation measures, then this would suggest they're already part of the Proposed Development.		Please clarify what is meant here by "in all cases, mitigation measures are presented as embedded".	<p>Paragraph 2.61 should be considered within the context of paragraphs 2.59 and 2.60. It is stated within these preceding paragraphs that mitigation measures are presented as embedded (for example within the design), specific commitments (for example within the CEMP measures to be adopted) or statements of fact (as required by statute or legal agreement).</p> <p>It is acknowledged that the final sentence in paragraph 2.61 could have been worded more clearly with the insertion of 'additional', as follows:</p> <p>"Where the need for <u>additional</u> mitigation is identified, each assessment confirms how the <u>additional</u> mitigation would be secured."</p>

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
2.5	Cumulative Schemes: 2.90	Paragraph 2.90 explains that some of the cumulative schemes previously identified at the EIA scoping stage have now been completed. As such, they will be accounted for in the baseline conditions and are therefore excluded as cumulative schemes. This is considered satisfactory. The list of cumulative schemes that have been considered as part of the inter-project cumulative assessment are also deemed satisfactory.		N/A	N/A
Chapter 3: Alternatives and Design Evolution					
No Comments					N/A
Chapter 4: Proposed Development Description					
No Comments					N/A
Chapter 5: Demolition and Construction Description					
No Comments					N/A

5. Independent Review of Volume 1: Main ES (Chapters 6 - 12)

Table 3: Independent Review of Volume 1: Main ES (Chapters 6 - 12)

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
Chapter 6: Socio-Economics					
6.1	Employment During Demolition and Construction	Local advertisement of job vacancies and local provision of skills training is proposed to enhance the beneficial economic effects during the demolition and construction phase of the Proposed Development. This can be secured through a Planning Condition.		WCC to note.	The Applicant agrees that this enhancement measure could be secured through the code of construction practice and associated skills/employment plan which be secured by means of an appropriately worded planning condition.
6.2	Primary and Secondary Education Provision	A financial contribution is proposed to mitigate the demand for primary and secondary education. This can be secured through a Planning Condition.		WCC to note.	The Applicant agrees that a financial contribution should be secured; however, through CIL contribution.
6.3	Assessment of Completed Development Effects: Healthcare Provision: 6.122	Paragraph 6.122 concludes that the effect on the capacity of healthcare provision due to additional demand for services is assessed to be a moderate effect in scale but does not state whether this is considered significant or not. Likely to be an accidental omission.		Based on Assessment Criteria it is inferred that this effect is considered significant, but can this be clarified?	Apologies this is an omission. Yes it is confirmed as a significant effect, pre-additional mitigation.
6.4	Primary Healthcare Provision	A financial contribution is proposed to mitigate the demand for primary healthcare. This can be secured through a Planning Condition.		WCC to note.	The Applicant agrees that a financial contribution should be secured; however, through CIL contribution
6.5	Assessment of Completed Development Effects: Open Space: 6.123 to 6.126	Paragraph 6.21 sets out only a brief methodology for assessing the various socio-economic effects. The methodology for assessing the 'demand for open space' isn't clear as it only refers to on-site provision which is then not what is discussed in Paragraphs 6.123 to 6.126 which relates to the wider area and ratio of		Please provide clarification on the precise effect being assessed, the methodology used to assess the effect and a	It is considered that the open space assessment is sufficiently clear. There is currently no specific published methodology for assessing open space and, therefore, the assessment can only be based on information that is publicly available. It has been stated

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
		population to open space provision. The statement that the effect would be beneficial and adverse is also misleading and unclear. In addition, the incorrect receptor is identified as the receptor is stated as open space facilities here whereas the receptor in the Summary Table (Table 6.18) is stated as Existing and New Residents. Generally, there is also a lack of clear statement of effect being assessed.		clear process following the methodology and evaluation of significance and conclusion on the significance of effect.	there is currently no open space on-site and, as there is no published information on levels of open space provision on individual sites, it is considered reasonable to refer to WCC's Open Space Strategy for information on the wider local area provision to provide context. The demand for open space provision has been determined by calculating the proposed development's forecast population against the WCC's Open Space Strategy ratio which is considered to be a logical and reasonable approach. The reason for determining that the effect would be both beneficial and adverse, and therefore neutral, is due to the fact that the proposed development is delivering new open space on-site despite its constrained nature (beneficial) although the level of on-site provision would not meet the spatial guidance (adverse). The receptor for this effect is the existing and new residents in relation to open space facilities, as the open space provision and therefore level of access to open space facilities, would directly affect those living at the proposed development and in the local area. Therefore, the open space facilities have been determined as being of medium sensitivity based on the baseline information and the magnitude of impact has been determined as low based on professional judgment in the absence of a specific published assessment methodology. On this basis, the residual effect has been determined as Negligible Neutral.

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
6.6	Assessment of Completed Development Effects: Play Space: 6.127 to 6.131	Paragraph 6.21 sets out only a brief methodology for assessing the various socio-economic effects. The methodology for assessing the 'demand for play space' refers clearly to the consideration of on-site provision. The statement that the effect would be beneficial and adverse is therefore misleading and unclear. In addition, the incorrect receptor is identified as the receptor is stated as play space facilities here whereas the receptor in the Summary Table (Table 6.18) is stated as Existing and New Residents. Generally, there is also a lack of clear statement of effect being assessed.		Please provide clarification on the precise effect being assessed, the methodology used to assess the effect and a clear process following the methodology and evaluation of significance and conclusion on the significance of effect.	<p>It is considered that the playspace assessment is sufficiently clear. There is currently no specific published methodology for assessing open space and the assessment can only be based on information that is publicly available. The demand for playspace provision has been determined by entering the proposed accommodation schedule into the GLA Population Yield Calculator which is considered a reasonable approach. The reason for determining that the effect would be both beneficial and adverse, and therefore neutral, is due to the fact that the proposed development would deliver playspace on-site despite its constrained nature (beneficial) although the level of provision would not meet the spatial guidance (adverse). The receptor for this effect is the existing and new residents in relation to playspace facilities, as the playspace provision and therefore level of access to playspace facilities would directly affect those living at the proposed development and in the local area. Therefore, the playspace facilities have been determined as being of medium sensitivity based on the baseline information and the magnitude of impact has been determined as low based on professional judgment in the absence of specific standard methodology. On this basis, the residual effect has been determined as Negligible Neutral.</p> <p>It should also be noted that this shortfall will be mitigated via a financial contribution calculated in accordance with WCC's standard methodology.</p>

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
6.7	Assessment of Completed Development Residual Effects: Play Space: 6.163	Paragraph 6.163 sets out mitigation that would be provided to address the 'demand for play space'. Given that this is provided to mitigate the effect it doesn't follow that a beneficial effect would result.		N/A. Although we would challenge the assertion that beneficial effect would result, as it is not identified as significant anyway, this is just a point for WCC to note.	Without additional mitigation it is considered that playspace would result in a Negligible Neutral effect, therefore with additional mitigation, the residual effect is considered to be slightly improved to Minor Beneficial. As stated, this is not considered a significant effect.
6.8	Play Space	A financial contribution is proposed to mitigate the demand for play space. This can be secured through a Planning Condition.		WCC to note.	The Applicant agrees that a financial contribution should be secured.
6.9	Demolition and Construction Cumulative Effects: 6.170	Paragraph 6.170 presents the results of the assessment of cumulative effects that are likely to occur during the demolition and construction phase of the Development. A major beneficial cumulative effect is identified but it isn't very clear what the effect is. The text also suggests that there might be more than one cumulative effect. No particular methodology is set out for the assessment of cumulative socio-economic effects in the earlier Methodology section but a qualitative assessment using professional judgement appears to have been made. This section would benefit from some clarity on the likely significant cumulative effect or effects identified and expanded justification on the conclusion reached.		Please provide clarification on the precise effect being assessed, the methodology used to assess the effect and a clear process following the methodology and evaluation of significance and conclusion on the significance of effect.	<p>In the absence of a specific published methodology for assessing socio-economic cumulative effects, the cumulative assessment has been based on professional judgment. The assessment is qualitative, based on quantitative information. The cumulative effect being assessed is the generation of demolition and construction employment. As discussed in the assessment, based on the limited demolition and construction information that is publicly available, it has been assumed that the demolition and construction stages of the cumulative schemes considered could overlap with that of the proposed development. Due to the number of cumulative schemes coming forward, the combined number of demolition and construction jobs, along with the fact that a number of them could overlap with the proposed development meaning that numerous apprenticeships could be completed which generally require a three-year duration,</p>

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
					the cumulative effect is expected to result in a Major Beneficial effect.
Chapter 7: Air Quality					
7.1	Consultation: Table 7.1	Table 7.1 identifies some comments made by WCC's Environmental Health Officer (EHO) requesting that the assessment takes account of future residents' private car ownership travelling to the Site and parking in nearby streets/within the neighbouring development. However, it is stated that this hasn't been done and it is not within the scope of the Transport Consultant to do this so not possible to take account of this traffic in the air quality assessment. However, it would seem conceivable that the Transport Consultants could model this using the same methods for predicting mode of travel and trip generation in the usual way.		<p>Please could the reason for not including this element of traffic be justified? It is accepted that this element of traffic may not influence the outcome of the air quality assessment, but that reasoning hasn't been provided currently. Perhaps a short exercise to estimate this element of traffic which may show it would be of little material consideration?</p>	<p>Table 7.1 and Technical Appendix 7.2 provide a detailed and sufficient justification on why future residents' private car ownership travelling to the site and parking in nearby streets/within the neighbouring development would be beyond the control of the Applicant. Overall, it would not be possible for the Applicant to prevent future residents from owning a vehicle and attempting to park on nearby streets.</p> <p>In Section 3.7.2 of the Transport Assessment an assessment of car parking, car ownership levels and the potential for sharing the WEG basement has been provided as discussed during the pre-application meetings with WCC. It states that the maximum car ownership for WEG and PGPS would be commensurate with local car ownership, resulting in a maximum car ownership equivalent to 335 cars for both WEG and the proposed development. The proposed development would be car-free with 18 accessible parking spaces and WEG/14-17 PG development has 346 car parking spaces. The WEG/14-17 PG and proposed development parking spaces would therefore be able to fully meet the car ownership demand and no overspill car parking on-street or worsening of parking stress would be expected. Furthermore, should the demand for additional parking arise, WEG/14-17 PG has the capacity to accommodate the proposed development</p>

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
					demand. The historical EIAs undertaken of WEG/14-17 PG, considered the fully operational basement car parking trips and emissions, so there is no need to revisit for the proposed development now under consideration as the potential for demand increase has been assessed.
7.2	Assessment Scope: 7.13	Paragraph 7.13 lists the technical scope of the air quality assessment which includes: 'Completed development road traffic emissions and the associated effects on human health receptors both on-site and off-site' as well as a site suitability assessment. Elsewhere reference is also made to the assessment of air quality effects on off-site receptors for the completed development phase e.g. Paragraph 7.138 and Table 7.17 but the methodology and assessment results only include the site suitability assessment.		Please clarify whether an assessment of air quality effects at off-site receptors was undertaken for the completed development phase.	<p>The air quality effects at off-site receptors for the completed development stage has been assessed against IAQM guidance and discussed in Paragraph 7.18. of the Assessment Scope section.</p> <p>During the completed development stage, the change in traffic flows brought about by the proposed development on local roads would be below the threshold of 100 AADT within an Air Quality Management Area (AQMA) for a detailed modelling assessment to be necessary. Considering the IAQM criteria for assessing significance, the air quality effects of the proposed development on existing receptors would be permanent, long-term Negligible Adverse and not significant.</p>
7.3	Air Quality of Future Residents of the Proposed Development	An updated air quality assessment is proposed to ensure appropriate mitigation is provided to those proposed residential units where façade concentrations are predicted to exceed the prevailing future guideline. This can be secured through a Planning Condition.		WCC to note.	The Applicant agrees to the imposition of an appropriately worded planning condition.

Chapter 8: Noise and Vibration

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
8.1	Noise and Vibration Assessment Methodologies	The noise and vibration assessment methodologies are considered appropriate. The correct scenarios appear to have been assessed.		N/A. WCC to note.	N/A
8.2	Assessment Method: 8.26	Paragraph 8.26 appears to have an incomplete sentence.		Please provide clarification by confirming if this paragraph is incomplete and provide full paragraph.	Apologies for this accidental omission. The completed sentence should read: <i>"Operational noise from servicing has been compared with the existing baseline (2020), as this is predicted to be the same as the future baseline in terms of noise. However, as the servicing is via basement 2 of WEG no significant additional source of noise is predicted to adjacent residential premises or the site itself."</i>
8.3	Noise Monitoring: Appendix 8.2	The baseline noise survey was undertaken in 2020 during the Covid pandemic was traffic levels were generally considered to be lower than typical. However, Appendix 8.2 provides comparisons with monitoring surveys undertaken for two EIAs for nearby sites show the 2020 results to be commensurate with these previous surveys. This is considered to provide good justification for the use of 2020 data.		N/A. WCC to note.	N/A
8.4	Demolition and Construction Noise Mitigation: 8.114	Paragraph 8.114 sets out the key mitigation measures / commitments contained within the framework CEMP to control noise effects arising from demolition and construction activities. These measures should be secured through the provision of a CEMP by way of a suitably worded planning condition as part of any planning permission.		N/A. WCC to note.	The Applicant agrees that the CEMP would be secured by means of an appropriately worded planning condition, as part of Westminster's Code of Construction Practice requirements.
8.5	Operational Plant Noise Mitigation: 8.118	Paragraph 8.118 sets out the key measures to ensure fixed plant meet noise limits identified. These measures		N/A. WCC to note.	The Applicant agrees that operational plant noise limits would be secured by means of an appropriately worded planning condition.

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
		should be secured by way of a suitably worded planning condition as part of any planning permission.			
Chapter 9: Wind Microclimate					
9.1	Assessment Scope: Configurations Assessed: 9.18	Paragraph 9.18 sets out 'configurations' that were assessed. However, it is not clear if these relate to the Demolition and Construction phase or the Completed Development phase. It seems most likely that these are the 'configurations' modelled in the wind tunnel for the assessment of wind microclimate effects once the Proposed Development is completed. If so, these are not consistent with those 'Assessment Scenarios' set out in Chapter 2. Paragraph 9.18 suggests that the Proposed Development was assessed cumulatively with 14 – 17 Paddington Green against the existing baseline rather than against the future baseline as set out in Chapter 2 of the ES.		Please clarify if the configurations set out in Paragraph 9.18 relate to the Demolition and Construction phase or the Completed Development phase. If these configurations do relate to the Completed Development phase, please clarify why these are not consistent with the approach on 'Assessment Scenarios' set out in Chapter 2.	Configurations 2, 3 and 4 set out in paragraph 9.18 relate to the completed development stage. Configuration 1 relates to the Existing Baseline. The configurations are consistent with the scenarios presented in Chapter 2, paragraphs 2.55 and 2.57. As agreed during the EIA Scoping process, the demolition and construction stage has not been quantitatively assessed in the wind tunnel as is typical for wind microclimate studies (and therefore has not been assigned configurations). However, a qualitative assessment has been undertaken based on professional judgement and experience taking into account the wind tunnel test results of Configurations 1-4. This is because the Demolition and Construction stage is a temporary condition and would be highly variable as the existing buildings are demolished and the proposed development is constructed.
9.2	Mitigation: 9.127	Paragraph 9.127 states that to mitigate adverse wind conditions during the Demolition and Construction phase the proposed landscaping should be in place locally around buildings where areas are accessible to occupants as phased occupation progresses. It is unclear whether this means that landscaping needs to be in place prior to occupation of any buildings and how critical that is.		Please clarify whether this means that landscaping needs to be in place prior to occupation of any buildings and how critical that is. Does	It can be confirmed that landscaping would be in place locally around buildings prior to occupation or these areas becoming accessible to pedestrians/occupants. This commitment is underscored in the development programme presented in Chapter 5: Demolition and Construction Description.

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
					<p>The presence of landscaping as shown in drawing 1446-013E and wind tunnel tested Configuration 3, is essential embedded mitigation that would ensure a suitable wind environment.</p> <p>The Applicant is happy to accept the imposition of an appropriately worded planning condition in this respect.</p>
9.3	Mitigation: 9.128 to 9.132	<p>Paragraphs 9.128 to 9.132 outline mitigation that was developed in response to the results of the assessment of wind microclimate effects once the Proposed development is completed. However, these paragraphs only suggest that this mitigation is part of the design of the Proposed Development. This suggests that the initial assessment was not of the fixed and final Proposed development as applied for.</p> <p>However, Paragraph 9.130 refers to a Tree Planting Strategy drawing (Drawing 1446-013E Tree Planting Strategy and Size Guide) which shows the landscaping proposed around the Site. This drawing does not appear to be included within Chapter 4: Proposed Development Description, nor elsewhere in the ES, nor submitted with the planning application.</p> <p>It is therefore unclear whether the initial assessment considered the Proposed Development or not and whether the assessment of 'configuration 3' is the Proposed Development with landscaping measures that are 'for approval' or whether these are suggested mitigation measures that would need to be secured by planning condition.</p>		<p>Please clarify whether the initial assessment considered the Proposed Development or not and whether the assessment of 'configuration 3' is the Proposed Development with landscaping measures that are 'for approval' or whether these are suggested mitigation measures that would need to be secured by planning condition.</p>	<p>As explained in paragraph 9.25 and agreed during the EIA process, Configuration 2 considered the proposed development without any proposed landscaping in order to present worst-case wind conditions. Configuration 3 includes the proposed development and the proposed landscaping scheme, which was developed in consultation with the design team and is presented in drawing 1446-013 and within the submitted design and access statement. This drawing was submitted as part of the planning submission and is therefore considered to be 'embedded' mitigation.</p> <p>Accordingly, this drawing forms the landscaping measures that are 'for approval' and it is expected that this drawing would be secured by means of an appropriately worded planning condition.</p>
9.4	Cumulative Effects: 9.146	<p>Paragraph 9.146 states that 3 schemes have been assessed together with the Proposed Development and Table 9.10 lists these but also states that they are not</p>		<p>Please clarify if these three cumulative schemes are or aren't</p>	<p>The three cumulative schemes have been wind tunnel tested together with the proposed development in Configuration 4. Configuration</p>

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
		likely to have cumulative effects. Nevertheless, a cumulative assessment is presented.		likely to combine with the Proposed Development to have cumulative effects and whether these three cumulative schemes are modelled in 'Configuration 4'?	4 provides quantitative confirmation that the addition of the three cumulative schemes to the proposed development would not significantly alter local wind condition when compared to Configuration 2.
9.5	Cumulative Effects: 9.151	<p>Paragraph 9.151 refers to wind tunnel results for 'configuration 4' which does not include the landscaping or wind mitigation measures of the Proposed Development. With reference to comments above, it is therefore unclear whether this configuration represents the Proposed Development for which planning approval is sought.</p>		<p>Please clarify whether configuration 4 represents the Proposed Development for which planning approval is sought.</p>	<p>As indicated in paragraph 151 and 152, Configurations 2 and Configuration 4 assesses the proposed development in the absence of landscaping and therefore represents worst-case conditions. These configurations do represent the proposed development for which planning approval is sought, but without landscaping. As indicated in Table 9.10 a comparison of the results for these two scenarios indicate no material differences in measured wind conditions, confirming that the cumulative schemes have no additional effect on local wind conditions.</p> <p>No new significant effects were introduced in Configuration 4 which would require additional mitigation measures over and above those identified for Configuration 2. Configuration 3 demonstrates that the embedded landscape mitigation would be successful in providing appropriate wind microclimate conditions for the majority of windy locations identified in Configuration 2. This would likewise apply in respect of Configuration 4.</p>

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
9.6	Cumulative Effects: 9.157	Paragraph 9.157 appears to have a typing error and it is likely that it is Table 9.12 that should be referred to here.		Please clarify if it is Table 9.12 that should be referred to here.	Apologies, this is a typographical error. It is confirmed that Table 9.12 should be referred to here.

Chapter 10: Daylight, Sunlight, Overshadowing and Solar Glare

10.1	Consultation: Table 10.1	Table 10.1 refers to an informal scoping letter from WCC (Nathan Barratt) where a request was made for daylight levels to be commensurate with typical VSC levels found in the local context of central London. The response to this request shown in the Table confirms that this will be done using two local recently consented developments to provide this context. However, this doesn't appear to have been done with the standard BRE Guidance level of 27% VSC used within the criteria for determining the scale and significance of effects. Similarly, the assessment results are also presented in terms of the BRE Guidance levels and not a more appropriate local context VSC level that was requested. It is acknowledged that when the assessment results are presented reference is always made to the fact that the local context should be accounted for but this is just a qualifying statement and the quantified assessment itself does not reflect the local context. This makes the results of the assessment very difficult to understand.		Please confirm why the daylight assessment criteria have not involved developing appropriate VSC levels based on the local context as requested by WCC at the EIA Scoping stage.	At the scoping stage, the relevant contextual analysis had not yet been undertaken. Throughout the design of the proposed development, contextual analysis regarding retained levels of daylight in the surrounding area were assessed in order to provide a comparison with the retained levels at windows and rooms facing the proposed development. It should be noted that BRE criteria were used initially in order to assess the significance of effect, with alternative targets provided for contextual reasoning for each receptor.
10.2	Assessment Scope: 10.17 to 10.18	Paragraphs 10.17 and 10.18 set out the assessment scenarios for the Completed Development stage. However, these scenarios are not consistent with those set out in Chapter 2 of the ES; specifically, Assessment Scenarios 1 and 3 are not relevant and did not therefore require assessment. The outcome is that the assessments results in this Chapter are extremely unwieldy and this makes the results of the assessment very difficult to understand. An example of this is		Please clarify the purpose of presenting assessment scenarios that appear to be unnecessary.	The scenarios assessed are in line with those set out at scoping stage and consistent with the assessment scenarios set out in ES Chapter 2. The assessment scenarios for the existing baseline, future baseline, proposed development and cumulative development take into account the phasing of immediately

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
		observed in comments below relating to Paragraph 10.543 onwards.			surrounding schemes currently under construction, in order to provide an understanding of the evolution of immediate context. As the delivery of these schemes are under the control of the Applicant, it was possible to more accurately predict future baseline conditions and therefore more informed consideration of both existing and future receptors. On this basis, the scenarios are considered to be appropriate and necessary.
10.3	Baseline Results: 10.137	Paragraph 10.137 appears to have a typing error: "For sunlight, 279 of the 250 (79.9%)..."		Please clarify with correct data.	Apologies, this is a typing error: For sunlight, 240 of the 310 (77.4 %) rooms would meet the BRE recommendations of APSH and WPSH.
10.4	Significance Criteria: 10.98 to 10.100	Paragraphs 10.98 to 10.100 explain that the significance of daylight and sunlight effects are assessed for an individual property only (even where a property has a large number of dwellings contained within it) although consideration is given to windows and rooms. However, no explanation of how windows and rooms are considered within the evaluation of significance. The presentation of the assessment results and evaluation of significance therefore makes the assessment outcomes very difficult to understand. In addition, the description of the 'Receptor' in paragraph 10.69 to 10.71 doesn't appear to acknowledge that residents are the receptor, not a window, room or property.		Please clarify how significance has been evaluated with regard to these observations and provide justification.	The approach that has been adopted is standard practice in EIA. As stated in the scoping report, professional judgement was used to determine the overall effect at each receptor. The BRE Guidance does not advise on assigning significance of buildings of multiple dwellings. Therefore, buildings are typically considered as a whole to assign an overall significance. This is determined using professional judgement taking a view of the affected windows and rooms and the factors listed in paragraph 10.93 of the ES. For all buildings where this applies, the discussion reports the magnitude of impact and scale of effect to all affected windows across the entirety of the building. The daylight and sunlight technical results in the accompanying technical appendix report on the specific windows and rooms which impacts

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
					occur, which are mapped on corresponding illustrations whereby the individual effects can be identified. Whilst it is noted that the residents are receptors, the technical assessment is undertaken on the geometry of the building.
10.5	Future Baseline (Scenario 2a v Scenario 2b): 10.543	Paragraph 10.543 onwards describes that for the assessment of Scenario 2 (which takes account of the Future Baseline) only three properties are considered further to those already considered for Scenario 1. An assessment of Scenario 1 (which takes account of the existing baseline conditions) is presented in the previous section (Paragraphs 10.167 to 10.542). However, Scenario 1 is unnecessary as that is not the 'do nothing' baseline. This means that to understand the correct results of the assessment of daylight and sunlight effects once the Proposed Development is completed, the reader has to read part of the Scenario 1 assessment and part of the Scenario 2 assessment. This is very unwieldy and could be avoided if the assessment for the correct Scenario only was provided.		Please clarify why the assessment is not consistent with the approach on 'Assessment Scenarios' set out in Chapter 2.	<p>The scenarios assessed are consistent with those set out at scoping stage and in ES Chapter 2.</p> <p>The assessment scenarios for the existing baseline, future baseline, proposed development and cumulative development take into account the phasing of immediately surrounding schemes currently under construction, in order to provide an understanding of the evolution of immediate context.</p> <p>As the delivery of these schemes are under the control of the Applicant, it was possible to more accurately predict future baseline conditions and therefore more informed consideration of both existing and future receptors. On this basis, the scenarios are considered to be appropriate and necessary.</p>
10.6	Cumulative Effects: 10.693	Paragraph 10.693 states that 3 schemes have been assessed together with the Proposed Development and Table 10.16 lists these but also states that they are not likely to have cumulative effects. Nevertheless, the cumulative assessment is presented and there does appear to be significant cumulative effects identified. The purpose of the Table is therefore unclear.		Please clarify if these three cumulative schemes are or aren't likely to combine with the Proposed Development to have cumulative effects.	There would be additional impacts as a result of cumulative schemes coming forward in conjunction with the proposed development, however, as demonstrated in the cumulative assessment scenario, the overall significance of effect would not change as the scale of effect would remain in the same numerical banding in respect of changes to daylight and sunlight levels and retained levels.

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
Chapter 11: Cumulative Effects					
No Comments					
Chapter 12: Residual Effects					
12.1	General	To be updated based on any comments on Volume 1: Chapters 6 - 11 and Volume 2: Townscape, Visual and Built Heritage Impact Assessment.			

6. Independent Review of Volume 2: Townscape, Visual and Built Heritage Impact Assessment

Table 4: Independent Review of Volume 2: Townscape, Visual and Built Heritage Impact Assessment

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
2.1	Consultation: 2.4	Paragraph 2.4 states that the EIA Scoping Opinion is still outstanding at the time of writing but Chapter 2 of Volume 1 of the ES states that an EIA Scoping Opinion was received.		Please confirm that the EIA Scoping Opinion was received and that the TVBHA was based on the EIA Scoping Opinion as reported within Volume 1 of the ES.	The consistency update was unfortunately not made in the Volume following the last minute receipt of the EIA Scoping Opinion. It can be confirmed that, the EIA Scoping Opinion was received and that the TVBHA was based on it.
2.2	Baseline Characterisation Method / Field Study: 2.47	Paragraph 2.47 doesn't include any methodology on the field study element of the baseline characterisation method, only that a site visit was carried out. Appendices don't appear to provide detail either.		<p>Please clarify the methodology for the field study, particularly the time of year and whether the field study included photography for the visitations presented later in Volume 2 as part of the assessment of effects on views.</p> <p>This involved visiting identified built heritage receptors to consider their setting in accordance with the guidance provided by Historic England in GPA3. Similarly, an appraisal was made of the surrounding townscape character using professional judgment in accordance with the guidance set out in GLVIA3.</p> <p>The visualisations which are included in the Visual Assessment were prepared by Miller Hare and are verified AVRs. Their methodology is presented in supporting Appendix 1 to Volume 2.</p>	<p>The site visit was undertaken in July 2020 to understand the immediate setting of the site, the setting of the surrounding built heritage receptors, the townscape character and appearance, and key viewpoints. Photographs were taken during the site visit.</p> <p>This involved visiting identified built heritage receptors to consider their setting in accordance with the guidance provided by Historic England in GPA3. Similarly, an appraisal was made of the surrounding townscape character using professional judgment in accordance with the guidance set out in GLVIA3.</p> <p>The visualisations which are included in the Visual Assessment were prepared by Miller Hare and are verified AVRs. Their methodology is presented in supporting Appendix 1 to Volume 2.</p>

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
2.3	Assessment of Cumulative Townscape Effects: 7.56	Paragraph 7.56 introduces a definition of cumulative townscape effects stating: " <i>Cumulative effects are the additional effects of the main project under consideration, on top of the cumulative baseline</i> ". However, inferring that the 'cumulative baseline' means a future baseline when all the cumulative schemes are completed, this isn't a correct definition which therefore raises a query on the outcome of the assessment as reported. However, it is difficult to tell from the rest of this section what the precise methodology for the cumulative assessment was and Section 2 of the TVBHA which presents the methodology isn't clear either. The assessment of cumulative townscape effects doesn't seem consistent with the assessment of cumulative built heritage effects, however.		Please clarify the methodology that has been used for the assessment of cumulative effects relating to townscape as well as built heritage and visual amenity.	<p>Cumulative future baseline is defined in paragraph 3.4 (3rd bullet point) of the scoping report, as the site condition in combination with other existing and/ or approved development.</p> <p>In ES Chapter 2, paragraph 2.80 confirms that additive cumulative effects were considered for visual and townscape. This was agreed during the EIA scoping process (see pages 42-43 of the scoping report).</p> <p>Paragraph 2.51 sets out the approach to cumulative assessment: which assessed the effect of the proposed development in the cumulative condition, when other relevant consented schemes, such as at Merchant Square, are complete. This approach is consistent with the agreed definition of cumulative future baseline. The salient cumulative schemes are identified at paragraph 2.81.</p> <p>The cumulative townscape assessment considers the effect of the proposed development on the identified townscape receptors when experienced in addition to the identified cumulative schemes.</p> <p>The same approach is taken to the assessment of cumulative built heritage effects, as agreed during the EIA scoping process (see page 47, final paragraph of the scoping report). See also paragraph 6.103 of the ES Volume 2.</p>

No.	Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
2.4	Visual Assessment: 8.2	Paragraph 8.2 explains the scenarios that the visual assessment considered. This comprises the Existing Baseline, Future Baseline with Proposed Development and Future Baseline with Proposed Development and Cumulative schemes. For each view assessed these three scenarios are presented. However, this means that the correct 'do nothing' baseline is not shown for each view. This makes it difficult for the reader to understand / visualise the effects, if indeed the assessment has been made in consideration of the correct 'do nothing' baseline.		Please clarify why the Future Baseline view is not presented for each viewpoint and whether the assessment involved consideration of the Future Baseline as part of the assessment of visual effects rather than the Existing Baseline.	As previously set out, the future baseline scenario (scenario 2) is not the same as the 'Do Nothing' scenario. The assessment scenarios presented in Chapter 2 was agreed during the EIA Scoping process and has been consistently adopted in the TVBHA. It was not proposed to present a future baseline AVR in isolation. Instead, the 'future baseline' schemes are shown for scenario 2 in purple wireline for ease of visual differentiation, as set out at paragraph 8.3. The assessment, in both narrative and in the tables, considers the effect of the proposed development in conjunction with the future baseline. This is illustrated on those views where it would be visible. It was not proposed to assess the hypothetical 'Do Nothing' scenario. Furthermore, in the case of the 'Do Nothing' scenario, the proposed development would not appear in the views, and therefore there would be no effect in conjunction with the future baseline.
2.5	Visual Assessment: 8.3	Paragraph 8.3 explains the colours used for wirelines within views to show elements of the views not currently present comprising blue, purple and orange. Throughout Section 8 visualisations are shown which also include pink wireline but it isn't clear what this is showing.		Please clarify what the pink wireline elements show in views presented in Section 8.	The reference to the pink wireline in paragraph 8.3 is an omission. The Pink wireline illustrates West End Green, and is referred to in the assessment text in section 8 e.g. paragraphs 8.76, 8.110, 8.132, 8.162, 8.174, etc. This is described in the Miller Hare methodology at Appendix 1.

7. Independent Review of the Non-Technical Summary

Table 5: Independent Review of the Non-Technical Summary

Section / Paragraph Reference within the Ramboll ES	Independent Review Comment(s) / Observation(s)	RAG Rating	Additional Information / Clarification Request	Applicants' Response
General	To be updated based on any comments on Volume 1: Main ES and Volume 2: Townscape, Visual and Built Heritage Impact Assessment.			Based on the clarification responses provided, it is considered that no updates to the NTS would be required as the methodology and conclusions of the EIA remain unchanged.

8. Next Steps

- 8.1 WCC and Avison Young (on behalf of WCC) are keen to work pro-actively with the Applicants and their team in order to move towards planning determination. It is suggested that following the Applicants' review and careful consideration of **Sections 3 to 7**, direct liaison occurs between the Applicants' team, WCC and Avison Young to ensure a full and correct understanding of the Ramboll ES and the contents of this Report, together with the intended response to the clarification / additional information requests set out within **Sections 3 to 7** of this Report.
- 8.2 It is fully appreciated that when reviewing substantial, detailed reports such as the Ramboll ES and other planning application documents, there could be an element of unintentional misinterpretation and misunderstanding such that various matters set out within **Sections 3 to 7** may be irrelevant, immaterial and / or easily resolvable.
- 8.3 Following liaison between the Applicants' team, WCC and Avison Young, a full written response to **Sections 3 to 7** of this Report is requested.
- 8.4 Following receipt of a full written response to **Sections 3 to 7** of this Report, WCC and Avison Young will consider the response provided and use this to draw final conclusions on the adequacy of the ES.

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I trust that the above advice on the adequacy of the Ramboll ES for the Paddington Green Police Station proposed development is satisfactorily clear but please don't hesitate to contact either myself or Hannah Fiszpan should you need to discuss any of the above.

Yours Sincerely

A handwritten signature in cursive script, appearing to read "S. Roberts".

Suzanne Roberts
Associate Director
suzanne.roberts@avisonyoung.com
For and on behalf of Avison Young (UK) Limited

Enc. Ramboll Response to Avison Young Report: Paddington Green Police Station, London:
Independent Review of the Environmental Statement (June 2021)

cc. Michelle Wheeler / Ben Seward, Ramboll

Technical Appendix 2.4(R): Ecological Impact Assessment

Intended for
Berkeley Homes (Central London) Limited


Date
November 2022



Project Number
1620009008-001

PADDINGTON GREEN POLICE STATION REPLACEMENT ECOLOGICAL IMPACT ASSESSMENT

PADDINGTON GREEN POLICE STATION REPLACEMENT ECOLOGICAL IMPACT ASSESSMENT

Project No. **1620009008-001**
Issue No. **Final**
Date **November 2022**
Made by **Daniel Hamp**
Checked by **Malcolm Robertson**
Approved by **Michelle Wheeler**

Made by: 

Checked/Approved by:  

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Version Control Log

Revision	Date	Made by	Checked by	Approved by	Description
1	19/10/2022	DH	MR	MR	Draft for Comment
Final	16/11/2022	DH	MR	MW	Final Planning Submission

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1. INTRODUCTION

1.1 Introduction

Ramboll UK Limited ('Ramboll') was commissioned by Berkeley Homes (Central London) Limited (the 'Applicant') to carry out an updated Ecological Impact Assessment (EcIA) in respect of redevelopment proposals for a site at 2-4 Harrow Road, Paddington, W2 1XJ (the 'site'). The site is located at OS grid reference TQ 2696 8174, as shown in Figure 2.1. It covers an area of approximately 0.83 hectares (ha).

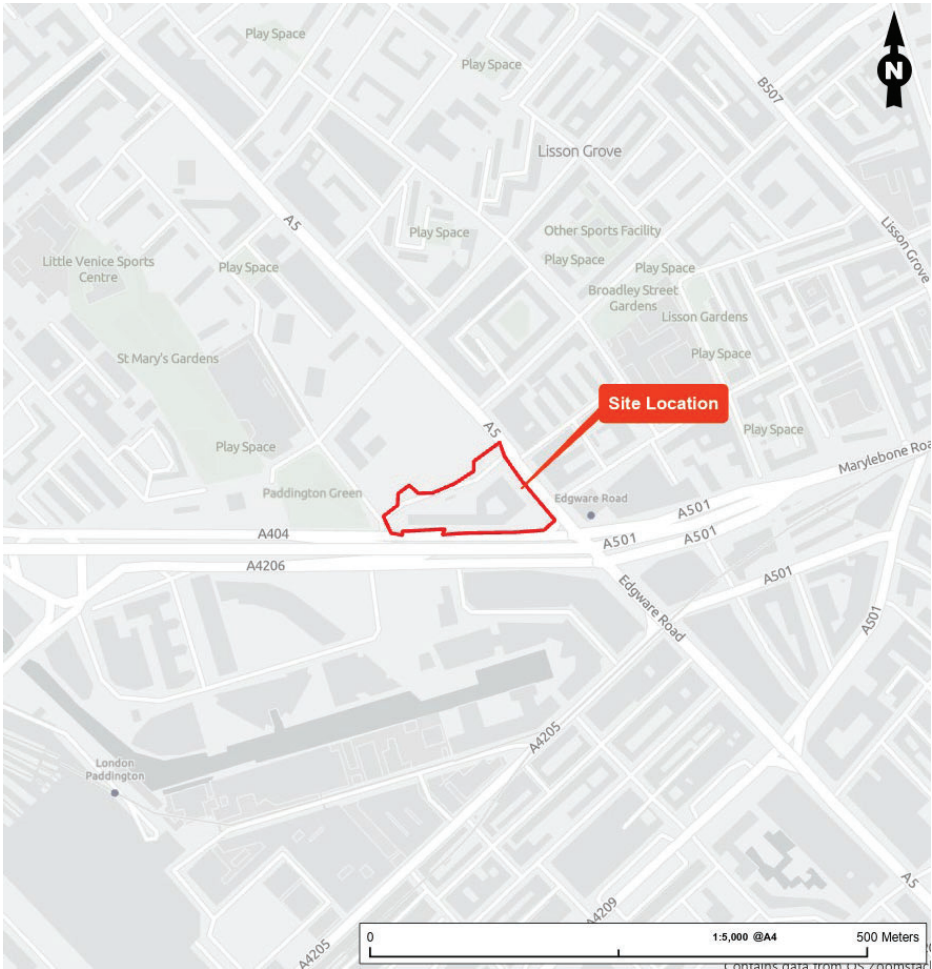


Figure 1.1: Site Location

1.2 Background

A full planning application (the 'application') was submitted by the Applicant on 1 April 2021 for a residential-led redevelopment(the '2021 proposed development') at the site under application reference 21/02193/FULL.

The application was accompanied by an Environmental Statement (the '2021 ES') prepared by Ramboll UK Ltd ('Ramboll') and a team of technical specialists, which comprised the following documents:

- Non-Technical Summary (NTS);
- Volume 1: Main Environmental Statement;
- Volume 2: Townscape, Visual and Built Heritage Assessment;
- Volume 3A: Technical Appendices.

The 2021 ES reported on the conclusions of an environmental impact assessment (EIA) that was undertaken of the 2021 proposed development in accordance with the statutory procedures set out in The Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (hereafter referred to as the 'EIA Regulations').

Following the submission of the application, Avison Young were commissioned by Westminster City Council (WCC) to undertake an independent peer review of the 2021 ES. Ramboll and the team of technical specialists responded, on behalf of the Applicant, to clarification comments made by Avison Young.

The application was considered at WCC's planning committee on 9 September 2021. WCC officers made a recommendation for approval. The planning committee resolved to refuse the application contrary to the officers' recommendation for the following suggested reasons (in summary):

- Due to the excessive height and bulk, Block K would have a detrimental impact on the local townscape, would result in substantial harm to the setting of the Little Venice, Paddington Green, Lisson Grove and Maida Vale Conservation Areas and have a detrimental impact on views from Regents Park and Hyde Park;
- The proposed development fails to maximise the number of dual aspect flats within Blocks I and J, resulting in poor levels of natural daylight and outlook due to the proximity of the existing buildings within West End Gate; and
- Due to the excessive height and bulk of the proposed blocks, the proposed development would result in a significant loss of daylight and sunlight to existing residential properties.

The application was subsequently referred to the Greater London Authority (GLA) for 'Stage 2' review. Following a review of the application and the proposed decision of WCC, the GLA considered that the proposed development was of strategic importance and had the potential to make an important contribution to housing and affordable housing supply. On 22 November 2021 the GLA directed that the GLA would act as the local planning authority for the purpose of determining the application.

1.3 Reason for Submission

The GLA's Stage 2 report (reference 2021/0711/S2) identified various areas where further work was anticipated in the event that the Mayor of London took over determination of the application. In particular, urban design, building height, residential quality, climate change and transport were identified.

The Applicant is now proposing to make amendments and refinements to the proposed development in order to address the areas of further work. These amendments comprise the following:

- Removal of Block I bullnose and movement of block footprint 8 m east;
- Reduction of Block J footprint width by 10 m;
- Increase in distance between Block I and Block J from 9 m to 10 m;
- Removal of Block K shoulder element;
- Removal of podium element (now three standalone blocks linked at basement level);
- Increase in the height of Block I from 62.020 m above ground floor finished floor level (FFL) (94.355 m AOD) (18 storeys) to 83.019 m above ground Floor FFL (115.219 m AOD) (24 storeys);
- Increase in the height of Block J from 54.145 m above ground floor FFL (86.480 m AOD) (15 storeys) to 60.389 m above ground floor FFL (92.724 m AOD) (17 storeys);
- Increase in the height of Block K from 110.720 m above ground floor FFL (143.055 m AOD) (32 storeys) to 133.969 m above ground floor FFL (166.304 m AOD) (39 storeys);

- Removal of roof level communal, residential amenity space at Block J;
- Removal of office floorspace and amenity space;
- Relocation of internal residential amenity space at Block K from level 25 to level 1;
- Amendment of residential unit / floorplate design to increase percentage of social rented units and the overall unit numbers;
- Removal of all north facing single aspect residential units and increase in dual aspect residential units up to approximately 55 %;
- Amendments to core arrangement (all cores now have a dual staircase, with one staircase terminating at basement level and one terminating at ground floor level);
- Amendments to B2 footprint (overall minor increase), previously B2 accessed via Block J core terminating at B2 level, now accessed via Block I core terminating at B2 level and redesign of waste management services;
- Amendments to B1 footprint (reduction of the western extent and north-eastern extent), on account of the following layout changes:
 - Omission of office bin store, office lifts and office facilities;
 - Relocation of residential bin store in Block K further south, to suit the new location of the refuse chute;
 - Relocation of plant to the north;
- Complete stopping-up and partial pedestrianisation of Newcastle Place to vehicle traffic with the exception of fire / emergency access;
- Increase in ground level public realm provision from 3,553 m² to 4,755 m²;
- Reduction in external communal amenity space provision from 835 m² to 0 m²;
- Increase in play space provision from 1,138 m² to 1,150 m²;
- Fully updated landscape design proposals; and
- Amendments to glazing ratio and the addition of spandrel panels to the façade to improve energy performance.

The 2021 proposed development as amended by the proposed amendments is hereafter referred to as the '2022 amended proposed development'.

A full update of the EIA has been undertaken to consider and assess the likely significant effects of the 2022 amended proposed development on the environment. Where relevant, consideration has been given to changes in baseline conditions; any new and emerging legislation, policy and assessment methodology requirements; and any new cumulative schemes that have come forward due to the passing of time.

1.4 Objectives

The aim of this report is to provide an updated EcIA in relation to the site and the zone of influence (ZOI) of the 2022 amended proposed development (CIEEM, 2022¹). The EcIA comprises a description of the existing on-site ecological conditions, as well as the ecological context of the site and its ZOI; an appraisal of the site's ecological importance; and an assessment of likely impacts in relation to the 2022 amended proposed development and is associated activities, taking into account the mitigation and enhancement measures incorporated into the 2022 amended proposed development. The structure and content of the report is based

¹Chartered Institute of Ecology and Environmental Management (CIEEM), 2022. Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal and Marine. Chartered Institute of Ecology and Environmental Management, London.
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on current ecological report writing guidance (CIEEM, 2017² and BSI Standards Institution, 2013³).

The content of this report is based on the findings of:

- a desk study;
- an updated extended Phase 1 habitat survey; and
- a daytime inspection of buildings, structures and trees for bats.

The objectives of this report are to:

- identify designated nature conservation sites located either within the site or the ZOI of the 2022 amended proposed development;
- assess the potential for the site and the ZOI of the 2022 amended proposed development to support populations of protected species or species of nature conservation importance⁴;
- record the main habitats and features of ecological interest on the site;
- assess the ecological importance of the site;
- describe the proposed mitigation measures; and
- assess the potential impacts and likely residual effects of the 2022 amended proposed development.

The report is supported by the following appendices:

- Appendix 1: Figures;
- Appendix 2: Legislation and Policy Context;
- Appendix 3: Site Photographs; and
- Appendix 4: Landscape Proposals.

1.5 Site Location and Description

The site is located at 2-4 Harrow Road, Paddington, London W2 1XJ. The immediate boundaries of the site are defined by the following:

- Newcastle Place road and the West End Gate (WEG) development (ref: 16/12162/FULL. Blocks A to F now completed and occupied) to the north;
- Edgware Road to the east;
- Harrow Road and the A40 to the south;
- Paddington Green Road and open space to the west; and
- 14-17 Paddington Green to the north-west which has recently been cleared by demolition works and is under construction through the implementation of the 14-17 Paddington Green application (Ref. 18/08004/FULL).

² CIEEM, 2017. Guidelines for Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester

³ BSI Standards Institution, 2013. BS 42020:2013. Biodiversity – Code of Practice for Planning and Development. BSI Standards Limited, London.

⁴ The following species are considered to be of nature conservation importance i) listed as a national priority for conservation (such as those listed as habitats and species of principal importance for the conservation of biodiversity under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006; ii) listed as a local priority for conservation, for example in the relevant local Biodiversity Action Plan (BAP); iii) assessed as a threatened or near-threatened species according to International Union for the Conservation of Nature (IUCN) red list criteria; iv) Red or Amber Listed species in national Species of Conservation Concern assessments; v) listed as a Nationally Rare or Nationally Scarce species (e.g. in one of the Species Status Project reviews) or a Nationally Notable species where a more recent assessment of the taxonomic group has not yet been undertaken; and/or vi) endemic to a country or geographic location (including endemic sub-species, phenotypes, or cultural behaviours of a population that are unique to a particular place).

The wider context surrounding the site is of a mixed nature with residential use predominant to the north, north-west and north-east with public open space in the form of Paddington Green to the west; small scale commercial along Edgware Road as part of the Edgware Road/Church Street district shopping centre which includes a street market; larger scale mixed-use to the south of the A40 in the Paddington Basin (including hotels; the Saint Mary’s Hospital; offices; and residential uses); and educational facilities (including the City of Westminster College Paddington Green campus) to the north-west.

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

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

1.6 2022 Amended Proposed Development

The planning applications description of the 2022 amended proposed development is as follows:

‘Demolition of the existing building and redevelopment of the site to provide three buildings of 39, 24 and 17 storeys in height, providing residential units (including affordable units)(Class C3), commercial uses (Class E), a community use (Class F.2), landscaping, tree and other planting, public realm improvements throughout the site including new pedestrian and cycle links, provision of public art and play space, basement level excavation to provide associated plant, servicing, disabled car parking and cycle parking and connection through to the basement of the neighbouring West End Gate development.’

The 2022 amended proposed development is anticipated to comprise the:

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

The proposed land uses are likely to comprise:

- approximately 556 homes, including 219 affordable housing units (Class C3);
- approximately 1,326 m² gross external area (GEA) flexible commercial and community space (Class E and F2);
- servicing and disabled parking at basement level; and
- Air Source Heat Pumps (ASHP) at basement and roof level and connection to the West End Gate (WEG) basement and CHP led energy centre for resilience purposes only.

Building heights would range from 17 to 39 storeys.

The 2022 amended proposed development would be car free with the exception of 3 % disabled parking provision.

Areas of proposed landscape planting / seeding include biodiverse roofs, flower-rich perennial planting, approximately 50 m of evergreen hedgerows, tree avenues (77 new trees are proposed with a mixture of native species, species of value for biodiversity and ornamental species), rain gardens and other vegetated sustainable drainage elements, a vertical stone wall fountain with

green wall to southern elevation and grassland lawns (sown with a species rich mix and regularly mowed. In addition, water features (chlorinated) or unplanted detention basins are also proposed. The landscaping and planting strategy is included in Appendix 4.

1.7 Legislation and Policy Framework

Various legislation and planning policies refer to the protection of wildlife. These are summarised in Appendix 2, but should not be regarded as a definitive legal opinion. When dealing with individual cases, the full texts of the relevant documents should be consulted and legal advice obtained if necessary.

2. METHODOLOGY

2.1 Desk Study

The purpose of the desk study was to collect existing baseline data about the site and the ZOI, such as the location of designated sites or other natural features of potential ecological importance such as woodland and ponds. The following ZOI has been considered:

- all statutory designated sites up to 2 km from the site, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites, National Nature Reserves (NNR), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Local Nature Reserves (LNR);
- non-statutory designated sites: Sites of Importance for Nature Conservation (SINCs) up to 2 km from the site;
- records of protected species up to 2 km from the site; and
- international and national statutory designated sites with bats as a qualifying feature for designation, up to 10 km from the site.

Greenspace Information for Greater London (GiGL) was contacted to provide details of designated sites and protected species within 2 km of the site. Due to data ownership restrictions in the reproduction of the GiGL report [Report Ref. 23181dr, dated 23 May 2022], it is not appended to this EcIA, but the information provided is summarised in the relevant sections. In addition, the Multi Agency Geographic Information for the Countryside (MAGIC) website⁵ was searched for supplementary information on statutory sites. This included a search for European Protected Species licences issued within 2 km of the site. Supplementary information on the site and its surroundings were obtained from aerial images available from Google™ Earth.

2.2 Updated Extended Phase 1 Habitat Survey

An updated extended Phase 1 habitat survey of the site was undertaken by Malcolm Robertson CEnv MCIEEM on 27 May 2022. Thjs survey was undertaken to validate a previous survey undertaken by Laura Sanderson CEnv MCIEEM on 4 September 2020. Photographs of the May 2022 survey are provided in Appendix 3.

Malcolm has a BSc in Geography/Biology and has worked professionally as a consultant ecologist since 2001. The weather during the survey period was hot and dry with little wind.

The survey involved a site walkover and preliminary assessment of key habitats, land use and ecological features, particularly focusing on areas of natural interest which will be affected by the 2022 amended proposed development. The main habitats present were recorded using standard Phase 1 habitat survey methodology as described in the Handbook for Phase 1 Habitat Survey (JNCC, 2010⁶). Target notes were used to record habitats and features of particular interest. In addition to general habitat classification, a list was compiled of observed plant species (using the nomenclature of Stace, 2019⁷, with common and Latin names referred to in the first instance after which only the common names are used). The abundance of each species was estimated for each habitat respectively using standard 'DAFOR' codes:

- D = Dominant.
- A = Abundant.
- F = Frequent.

⁵ www.magic.gov.uk, accessed June 2022.
⁶ Joint Nature Conservation Committee (JNCC), 2010. Handbook for Phase 1 habitat survey – a technique for environmental audit. JNCC Peterborough
⁷ Stace, C., 2019. New Flora of the British Isles 4th Edition. Cambridge University Press

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- O = Occasional.
- R = Rare.

The site was assessed for its potential to support protected and notable species such as birds, bats and badgers *Meles meles*, and was inspected for signs of any invasive plant species subject to legal controls. This was in order to identify potential ecological constraints and to guide recommendations for further survey requirements for these species.

2.3 Daytime Building and Tree Inspection for Bats

A daytime inspection of buildings, trees and structures was completed on 27 May 2022 during the updated extended Phase 1 habitat survey by Malcolm Robertson. Trees and the exterior elevations of the site’s buildings and structures were visually inspected for field evidence of roosting bats including droppings, urine staining, feeding remains and potential roosting points. In accordance with the guidance outlined in Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd edition (Collins, 2016⁸) each building was assessed for its potential to support bats. The following building types and features are considered to be of particular suitability to support roosting bats:

- Buildings of pre-20th or early 20th century construction;
- Agricultural buildings of brick, stone or timber construction;
- Large and complicated roof void(s) with unobstructed flying spaces;
- Large (>20 cm) roof timbers with mortise joints, cracks and holes;
- Entrances into buildings for bats to fly through;
- Poorly maintained buildings such that they provide access points for bats into roofs, walls, bridges, but at the same time not being too cool and draughty;
- Roof warmed by the sun e.g. south facing;
- Weatherboarding and/or hanging tiles with gaps;
- Undisturbed building roofs and structures;
- Buildings and built structures in proximity to each other providing a variety of roosting opportunities throughout the year; and
- Buildings and built structures close to good foraging habitat e.g. mature trees, parkland, woodland or wetland.

The following tree features are considered of particular suitability to support roosting bats:

- Natural holes;
- Woodpecker holes;
- Cracks / splits in major limbs;
- Loose bark;
- Bat, bird or mammal boxes;
- Partially detached large-stemmed ivy; and
- Other hollows / cavities.

Each building, structure and tree onsite has been classified into a category dependent on the presence of features suitable to support bat roosts. The categories assigned were: Confirmed Roost, High, Moderate, Low and Negligible Potential for use by bats. Table 3.1 below provides criteria for each of these categories. In addition, the suitability of the site for foraging and commuting bats was assessed.

⁸ Collins, J., 2016. Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition). Bat Conservation Trust (BCT).1620009008_2_Paddington Green Police Station_Replacement EcIA.docx

Table 2.1: Building, Structure and Tree Bat Roost Potential Categories	
Roost Potential	Description
Confirmed	A building, structure or tree that is confirmed to support a bat roost.
High	A building, structure or tree with one or more potential roost site that is obviously suitable for use by larger numbers of bats on a regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
Moderate	A building, structure or tree with one or more potential roost site that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
Low	A building or structure with one or more potential roost site that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection and / or suitable surrounding habitat to be used on a regular basis or by a large number of bats (i.e. unlikely to be suitable for hibernation or maternity). Trees of sufficient size and age to contain potential roost features but with none seen from the ground or features seen with very limited roosting potential.
Negligible	Negligible habitat features likely to be used by roosting bats and bats very unlikely to be present.
Notes: Category descriptions drawn from Collins (2016)	

2.4 Importance Criteria

The importance of ecological features (i.e. designated sites, habitats and species), identified within the zone of influence has been assessed using a scale that classifies ecological features within a defined geographic context in accordance with CIEEM guidelines (2019). The following frame of reference has been used for the site:

- International and European Importance;
- National Importance (England);
- Regional Importance;
- Borough Importance (City of Westminster);
- Local Importance (within an approximately 1 km radius of the site);
- Site-level⁹ Importance (limited to the site boundary or ZOI); and
- Negligible Importance.

Various characteristics contribute to the importance of ecological features. These include recognised and published criteria (e.g. Ratcliffe, 1977¹⁰, Wray *et al.* 2010¹¹) where the ecological features are assessed in relation to their size, diversity, naturalness, rarity, fragility, typicalness, connectivity with surroundings, intrinsic value, recorded history and potential importance.

A wide range of sources can be used to assign importance to ecological features, including legislation and policy. In the case of designated sites, their importance reflects the geographic context of the designation. For example, sites designated as SACs are recognised as being of importance at an International level. Ecological features not included in legislation and policy may also be assigned importance, due to, for example, local rarity or decline, or provision of a

⁹ Note that Site-level is not defined in CIEEM, 2019. It is used here to define ecological features which contribute to the biodiversity importance of the site, but not at a level which can be considered locally important or higher. It is important in the context of biodiversity net gain.
¹⁰ Ratcliffe, D.A. (Ed)., 1977. A Nature Conservation Review. 2 vols. Cambridge University Press.
¹¹ Wray S, Wells D, Long E, Mitchell-Jones T., 2010. Valuing Bats in Ecological Impact Assessment, CIEEM In-Practice. 23-25.1620009008_2_Paddington Green Police Station_Replacement EcIA.docx

functional role for other ecological features. Professional judgement is used to assign such importance.

2.5 Method of Assessment

The ecological impact assessment has been undertaken by means of existing best practice tools and techniques as recommended by CIEEM. As such, potential impacts and effects on ecological features (as defined by baseline conditions) have been assessed taking into consideration mitigation measures integral to the 2022 amended proposed development; consideration has been given to the need for additional mitigation to reduce or off-set potential significant effects, and finally all residual effects have been assessed as either significant or not significant at the relevant geographic level. As part of this, consideration was given to the avoidance, mitigation, restoration, compensation and enhancement measures (the 'mitigation hierarchy') integral to the 2022 amended proposed development.

2.6 Significance

The potential impacts and likely effects on ecological features were considered in relation to the 2022 amended proposed development at the site. The assessment was made by reference to the pre-development baseline conditions at the site. The impacts and effects have been characterised according to the following variables:

- Magnitude and extent - quantitative size of an impact (e.g. area of habitat/number of individuals);
- Timing – when the impact may occur;
- Duration and reversibility - timescale of effect (days/weeks/months/years) until recovery. Permanent impacts are described as such, and likelihood of recovery is detailed where appropriate;
- Frequency - frequency of effect (if appropriate; described as low to high and quantified where possible);
- Complexity - whether the effect would directly or indirectly affect the feature; and
- Negative/ positive - if the effect would be beneficial or detrimental to the feature.

The assessment only describes those characteristics relevant to the ecological effect and determining the significance. For example, timing of when a habitat is destroyed may not be relevant in relation to the assessment of the effect on the habitat. However, it may be relevant to assessing the impact to the species that occur within the habitat (e.g. roosting bats).

In accordance with CIEEM guidance, each impact has been assessed as having a significant effect or not having a significant effect upon each ecological feature qualified with reference to the appropriate geographic scale. The importance level of the ecological feature concerned may be a determinant of the geographical level at which the effect is significant. For example, a significant effect to a Site of Special Scientific Interest (SSSI), is likely to be significant at a national level. However, it may be the case that the effect could be considered significant at a lower or higher geographical level than that at which the feature is important, depending on the magnitude of the effect. A significant effect is an effect that either enhances or undermines the conservation objectives of an ecological feature. Conservation objectives may be specific (e.g. for a designated site), or broad (e.g. national conservation policy).

2.7 Pre-Submission Consultation

An EIA Scoping Report¹² was submitted to WCC on 17 September 2020 in support of a request for a formal EIA Scoping Opinion pursuant to Regulation 15(1) of the EIA Regulations. The EIA Scoping Report detailed the proposed scope and methodology of the ecological assessment and

¹² Ramboll, 2020. 1620009008_4_PGPS EIA Scoping Opinion Request.
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proposed mitigation and these were agreed by WCC in their EIA Scoping Opinion, adopted on 25 March 2021. The scope is considered to remain valid, given the similar nature of the 2021 proposed development and the 2022 amended proposed development.

2.8 Limitations

It should be noted that availability and quality of the data obtained during desk studies is reliant on third party responses. This varies from region to region and for different species groups. Furthermore, the comprehensiveness of data often depends on the level of coverage, the expertise and experience of the recorder and the submission of records to the local recorder. Accordingly, the conclusions in this report are valid only to the extent that the information provided to Ramboll was accurate, complete and available to Ramboll within the reporting schedule.

The updated extended Phase 1 habitat survey provides a snapshot of ecological conditions and does not record plants or animals that may be present on-site at different times of the year. The survey was undertaken during the optimum April to September Phase 1 habitat survey period when plants are generally visible.

Ramboll is satisfied that this report represents a robust appraisal of the site. If any action or development has not taken place on this land within 12 months of the date of this report, the findings of this survey should be reviewed by a suitably qualified ecologist and may need to be updated in line with CIEEM's 'Advice Note on the Lifespan of Ecological Reports and Surveys' (2019)¹³.

¹³ Chartered Institute of Ecology and Environmental Management (CIEEM), 2019. Advice Note on the Lifespan of Ecological Reports and Surveys. CIEEM, Winchester. Available online: <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf> [Accessed 04/09/2019]
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3. BASELINE CONDITIONS

3.1 Desk Study

3.1.1 Landscape Context

The site is an urban location, with roads and buildings to the north, east and south. Paddington Green is immediately to the west, with roads and buildings beyond this, and Paddington Basin, Regent's Canal and the Paddington Arm of the Grand Union Canal are within 1 km of the site to the north, south and west.

3.1.2 Designated Sites

Statutory Sites

No SACs, SPAs, Ramsar sites, SSSIs, NNRs are located within 2 km of the site, however there is one LNR, St John's Wood Church Ground (also a SINC, see below). There are no SACs designated for bats within 10 km of the site.

Non-Statutory Sites

In London there are the following three tiers of SINC:

- 1. Sites of Metropolitan Importance (SMINC);
- 2. Sites of Borough Importance (Borough Grade I and Borough Grade II) (SBINC); and
- 3. Sites of Local Importance (SLINC).

GiGL identified 21 SINCs located within 2 km of the site. These are listed in Table 3.1. No further designated sites are present within 2 km of the site.

Table 3.1: Sites of Importance for Nature Conservation within 2 km of Site			
Name	Type	Location	Reason for designation
London's Canals	Metropolitan	Approximately 200 m south at closest point, also north and west.	London's canals provide a home for many fish and aquatic plants.
Regent's Park	Metropolitan	1 km east north-east.	This historic Royal Park is probably the best place site for breeding and migrant birds in central London. Its famous heronry is one of London's largest.
Hyde Park and Kensington Gardens	Metropolitan	Over 500 m south.	The largest area of open space in central London, these Royal Parks have long been recognised as having considerable importance for their birds.
St John's Wood Church	Borough Grade I	1 km north.	A small park with an attractive wildlife area, designated a Local Nature Reserve.
London Zoo	Borough Grade I	1.9 km north-east.	One of London's top tourist attractions, the

Table 3.1: Sites of Importance for Nature Conservation within 2 km of Site			
Name	Type	Location	Reason for designation
			zoo is of enormous educational importance. It also provides food and home for a number of wild birds.
Primrose Hill	Borough Grade II	1.9 km north-east	Famous area of Regent's Park with great views of London.
Hyde Park Gardens	Borough Grade II	Over 500 m south.	An attractive garden square, adjacent to Hyde Park, with a variety of habitats including woodland providing a home for a large number of common birds.
Little Venice Garden, Winston Garden and The Crescent Garden	Borough Grade II	Over 500 m north-west	Three large communal back gardens in Maida Vale, which are home to many garden birds.
St Mary's Churchyard and Paddington Green	Borough Grade II	Adjacent to the Site boundary, beyond a minor road to the west	This historic churchyard and associated open spaces combine cultural, wildlife and amenity value in a densely built-up area beside the Westway and Paddington Station.
Park Square Gardens	Borough Grade II	Approximately 100m north-west.	A garden square particularly valuable for birds.
Portman Square and Manchester Square	Borough Grade II	1 km south-east.	These two squares lie just behind the busy shopping area of Oxford Street and are surprisingly rich in wildlife for their location.
Greville Place Nature Reserve	Local	2 km north-west.	A small nature reserve with trees, shrubs and an attractive pond.
Mount Street Gardens	Local	1.8 km south-east.	An attractive, small public garden with a secluded atmosphere.
Lisson Garden	Local	Approximately 260 m east	A small children's playground and garden, in a heavily built up area just to the north of Marylebone Road,

Table 3.1: Sites of Importance for Nature Conservation within 2 km of Site			
Name	Type	Location	Reason for designation
			which has been developed on unusually naturalistic lines.
Talbot Square	Local	Over 500 m south.	A garden square with a good range of wildlife habitats.
Hallfield Primary School and Housing Estate	Local	Over 500 m south-west	A school and housing estate with a good range of wildlife habitats, supporting a population of hedgehogs.
Paddington Recreation Ground	Local	1.5 km north-west	A large open space with numerous features of value to wildlife scattered among the sports pitches, including trees, hedges and wild flowers.
Porchester Square Gardens	Local	900 m west.	A small public park with plenty of large trees and a good range of common birds.
Kildare Gardens	Local	1.5 km west.	This tiny public garden in the Westbourne Park area supports a surprising range of birds for its size.
Westbourne Green Meadow	Local	900 m west.	Important green space alongside the A40 fly-over in north Paddington, with an attractive wildflower meadow.
Paddington Street Gardens	Local	1 km east.	An attractive formal park and a smaller, secluded garden, with a good range of common birds.

3.2 Habitats

The following descriptions of habitats should be read in conjunction with the Replacement Phase 1 Habitat Plan in Appendix 1.

3.2.1 General Site Description

The site is dominated by several connected buildings, with hardstanding and no areas of green space.

3.2.2 Ephemeral/Short Perennial

Small amounts of scattered ephemeral vegetation are present, growing in cracks in hardstanding in the west and southeast of the site. These include occasional white stonecrop *Sedum album*, Canadian fleabane *Erigeron canadensis*, dandelion *Taraxacum officinale* agg., common nettle *Urtica dioica*, smooth sow-thistle *Sonchus oleraceus*, dove’s-foot cranesbill *Geranium molle* and small butterfly bush *Buddleja davidii* plants.

Small amounts of scattered ephemeral vegetation is of negligible ecological importance given the widespread occurrence of this habitat across urban London.

3.2.3 Buildings and Structures

The site is primarily occupied by the Paddington Green Police Station, which was constructed in the 1970s. The main on-site built development comprises the following:

- A single, interconnected building, albeit with a number of different, interrelated built forms, with hardstanding. This includes the 17 storey accommodation/section house on the eastern side of the site, a main office and police front of house 3 storey building below this on the eastern side of the site, and an 8 storey annex at the western side of the site, connected by a single storey building that previously housed high security cells;
- A single level of basement and a surface level podium car park to the rear, both accessed from Newcastle Place;
- Newcastle Place; and
- An electricity substation in the north-eastern corner.

The suitability of the buildings for use by birds and bats is described in Section 3.3. The buildings are of negligible ecological importance in their own right.

3.2.4 Hardstanding

The remaining areas of the site are formed of concrete, tarmac, cobble and paving hardstanding. Hardstanding is of negligible ecological importance.

3.2.5 Street Trees

In total there are 13 trees present on the pavements surrounding the building, within the site boundary. These include mature London plane *Platanus x hispanica* trees, semi-mature and young lime *Tilia* sp. trees, young Turkish hazel *Corylus colurna* and four small, young non-native trees in pots at the entrance to a new building (Block C of the WEG development) in the north-eastern corner of the site.

Street trees contribute to the amenity value of the surrounding area, as well as supporting birds and invertebrates, and are therefore of Site level importance. The suitability of the trees for use by birds and bats is described in Section 3.3.

3.2.6 Introduced Shrub

Target Note 2 marks the location of several small planters with small/young exotic shrub species in them. These appear to be of recent origin and due to their small size are of negligible ecological importance.

3.2.7 Invasive Species

No invasive species subject to legal control were recorded on the site.

3.3 Species

3.3.1 Invertebrates

Records of a small number of invertebrates from within 1 km of the site, including Wildlife and Countryside Act protected stag beetle *Lucanus cervus*, were provided by GiGL.

The site is of negligible suitability for use by important invertebrates including stag beetle, due to the lack of suitable habitat. It is therefore of negligible importance for invertebrates.

3.3.2 Birds

GiGL data provided records of a large number of bird species from within 1 km of the site. Those which may be relevant to the site include starling *Sturnus vulgaris* (Birds of Conservation Concern (BoCC) red list¹⁴), house sparrow *Passer domesticus* (BoCC red list), swift *Apus apus* (BoCC red list), herring gull *Larus argentatus* (BoCC red list), peregrine (Wildlife and Countryside Act 1981 Schedule 1 species) and black redstart *Phoenicurus ochruros* (Wildlife and Countryside Act 1981 Schedule 1 species, BoCC amber list). No evidence of these species other than herring gull was recorded on the site.

Feral pigeon *Columba livia domestica* and herring gull were recorded on the site during the survey (herring gull in flight only). The buildings on the site are suitable for nesting by feral pigeon, Target Notes 1 and 3 on the habitat survey drawing in Appendix 1 mark broken or open windows through which feral pigeons could enter the building, Target Note 6 marks an area of plant space in the building courtyard where feral pigeons were noted on a ledge and where nests may potentially be present.

The trees surrounding the site are suitable for use by nesting and foraging common urban bird species and an old nest was noted in a Turkish hazel tree in the south-eastern corner of the site. The site is potentially suitable for nesting peregrines, given the disused nature of the tallest tower, however several tower blocks in the vicinity are taller (and therefore likely more attractive to the species for nesting). There are no records of peregrine from the vicinity since 2010 and the species is likely absent. The site is not considered to be suitable for use by black redstart due to the lack of foraging habitat on site and in the local area (and the nearest record is 374 m north west, the most recent record being from 2017). The site is considered to be of Site level importance for birds.

3.3.3 Bats

Records of a number of bat species, namely serotine *Eptesicus serotinus*, Myotis, Daubenton’s *Myotis daubentonii*, *Nyctalus*, noctule *Nyctalus noctula*, Leislers bat *N. leisleri*, unidentified, Nathusius’ common and soprano pipistrelles *Pipistrellus* sp., *P. nathusii*, *P. pipistrellus* and *P. pygmaeus* were provided from within 2 km of the site, with the closest being from 210 m north of the site and the most recent being 870 m west.

Although some crevices were present on the exterior of the buildings, including broken cladding around the entrance porch on the south-east side of the building, a small opening on the corner of a flat roof on the single storey building at Target Note 4 and open windows, the site is not considered to be suitable for use by roosting bats due to the very urban, disturbed and well-lit nature of the site with no optimal foraging opportunities in the immediate vicinity. No features suitable for roosting bats are present on the trees on site.

The site is not suitable for regular use by foraging or commuting bats, due to its very urban nature with very limited habitat suitable for invertebrate prey species. The nearest area of

¹⁴ Stanbury, A.J., Eaton, M.A., Aebischer, N.J., Balmer, D., Brown, A.F., Douse, A., Lindley, P., McCulloch, N., Noble, D.G. & Win, I. 2021. Birds of Conservation Concern 5: the status of all regularly occurring birds in the UK, Channel Islands and Isle of Man. .1620009008_2_Paddington Green Police Station_Replacement EcIA.docx

habitat potentially suitable for use by foraging and roosting bats is St Mary’s Churchyard and Paddington Green to the west of the site.

The site is therefore considered to be of negligible importance for bats.

3.3.4 Other Protected Species

Records of a number of other species from within 1 km of the site were provided by GiGL, including common frog *Rana temporaria*, common lizard *Zootoca vivipara*, slow-worm *Anguis fragilis* and hedgehog *Erinaceus europaeus*.

The site is not suitable for use by other protected or notable species such as amphibians, reptiles and badgers, due to the lack of suitable habitat and poor or no connectivity to suitable habitat elsewhere.

3.4 Ecological Importance

Table 3.2 presents the ecological importance of habitats and species present on the site, in accordance with CIEEM guidance. Species assessed as being unlikely to be present on the site are not considered further in this assessment.

Table 3.2: Ecological Importance of On-Site Features		
Feature	Ecological Importance	Rationale
Ephemeral/Short Perennial Vegetation	Negligible	Very small amount of scattered vegetation growing in cracks, unlikely to significantly contribute to the biodiversity importance of the site.
Buildings and Structures	Negligible	Does not contribute to biodiversity importance of the site.
Hardstanding	Negligible	Does not contribute to biodiversity importance of the site.
Street Trees	Site Level	Contribute to amenity value of surrounding area and support birds and invertebrates.
Exotic shrubs	Negligible	Does not contribute to biodiversity importance of the site.
Invertebrates	Negligible	Very limited numbers of common invertebrates likely to use the site as part of wider resource.
Birds	Site Level	Building may be used by nesting feral pigeon, and street trees suitable for use by foraging and nesting common bird species.
Bats	Negligible	The site is not suitable for regular use by bats.

4. ASSESSMENT OF POTENTIAL EFFECTS, MITIGATION MEASURES AND RESIDUAL EFFECTS

This section describes potential impacts that could arise from the 2022 amended proposed development on the site, in the absence of mitigation, and outlines mitigation measures that have been included in the 2022 amended proposed development to avoid significant impacts on ecological features and maximise biodiversity enhancement. Residual effects are then described.

The 2022 amended proposed development would result in the removal of all buildings and replacement with three buildings of up to 39 storeys. Areas of landscape/seeding include biodiverse roofs (approximately 797 m²), flower-rich perennial planting (approximately 834 m²), approximately 30 m of evergreen hedgerows, tree avenues (77 new trees are proposed with a mixture of native species, species of value for biodiversity and ornamental species), rain gardens and other vegetated sustainable drainage elements (99 m²), a vertical stone wall fountain with green wall to southern elevation and amenity grassland lawns (sown with a species rich mix and regularly mowed - approximately 494 m²). In addition 31 m² of water features (chlorinated) or unplanted detention basins are proposed.

In line with planning policy (as described in Appendix 2), any development should aim for net gains in biodiversity.

4.1 Potential Effects

4.1.1 Designated Sites

St Mary's Churchyard and Paddington Green SINC is located adjacent to the site. This is a Borough Grade II site, listed for its plant and bird communities. Although the SINC would not be directly impacted as a result of the 2022 amended proposed development, there is potential for indirect impacts on it as a result of the proposals. A number of other SINCs are present in the wider area, but due to the distance from the site, effects as a result of the 2022 amended proposed development are not considered likely. In the absence of mitigation, the 2022 amended proposed development would likely result in the following effects at the demolition and construction and completed development stages:

- Demolition and Construction Stage: Significant Negative effect at up to the Local Level, due to pollution, noise disturbance, dust and waste run off effects on St Mary's Churchyard and Paddington Green SINC; and
- Completed Development Stage: No Significant effects.

4.1.2 Habitats

Redevelopment of the site would lead to the loss of all buildings, hardstanding, introduced shrubs and ephemeral/short perennial vegetation. The trees would be retained other than one Turkish hazel tree in the south-eastern corner of the site, four recently planted limes and four small non-native trees in pots along the northern boundary of the site.

Buildings, hardstanding, introduced shrub and ephemeral/short perennial vegetation are assessed as being of Negligible importance and are not considered further. The street trees are of importance at the Site level.

In the absence of mitigation, the 2022 amended proposed development would likely result in the following effects at the demolition and construction and completed development stages:

- Demolition and Construction Stage: Significant Negative effect at the Site Level, due to loss of trees and the potential for unmitigated impacts on trees (e.g. inadvertent or accidental damage from construction activity); and

- Completed Development Stage: Following the establishment of habitats which may take ten or more years, and provided habitats are managed appropriately, Significant Positive effects at the Site Level.

4.1.3 Species

Invertebrates

The site is considered to be of Negligible importance for invertebrates. In the absence of mitigation, the 2022 amended proposed development would likely result in the following effects at the demolition and construction and completed development stages:

- Demolition and Construction Stage: No Significant effects; and
- Completed Development Stage: Following the establishment of habitats which may take up to three years for habitats suitable for invertebrates to develop, and provided habitats features for invertebrates are managed appropriately, Significant Positive effects at the Site Level.

Birds

Loss of habitat at the site (including vegetation and buildings) would potentially affect nesting birds, for which the site is of Site level importance, and if undertaken at the wrong time of year could result in contravention of wildlife legislation. Therefore, the loss of these habitats would likely result in the following effects at the demolition and construction and completed development stages:

- Demolition and Construction Stage: Significant Negative effect at the Site Level; and
- Completed Development Stage: Following the establishment of habitats which may take up to three years for habitats suitable for birds to develop, and provided habitat features for birds are managed appropriately, Significant Positive effects at the Local Level.

Bats

The site is of Negligible importance for bats, and in the absence of mitigation, the 2022 amended proposed development of the site would likely result in the following effects at the demolition and construction and completed development stages:

- Demolition and Construction Stage: No significant effects; and
- Completed Development Stage: No significant effects.

4.2 Mitigation and Enhancement Measures

4.2.1 Designated Sites

The 2022 amended proposed development would be subject to a Construction Environmental Management Plan (CEMP), which would be secured via an appropriately worded planning condition under Westminster's Code of Construction Practice provisions, which will include measures to reduce run-off, noise, lighting and dust impacts caused during the demolition and construction period, to avoid impacts on surrounding habitats and species.

The CEMP would include the following:

- Specifications for the appropriate timing of works. For example, demolition would be undertaken between September and February, outside of the bird nesting period or where demolition coincides with the nesting period (March to August) site clearance or demolition would be subject to checked by an ecologist in advance for the presence of nesting birds and appropriate avoidance or protection measures defined if required to avoid impacts on bird nests; and
- Pollution prevention measures to prevent work causing run-off, air pollution or hydrological changes to habitats.

4.2.2 Habitats

The following new habitat will be provided within the 2022 amended proposed development, providing considerable biodiversity and amenity enhancement for the site, as shown in the landscape masterplan (see Appendix 4):

- Areas of landscape planting including biodiverse roofs on each of the three blocks, flower-rich perennial planting, evergreen (native yew) hedgerows, trees, a green wall, managed lawns sown with a species rich grassland mix and rain gardens are proposed.
- Landscape planting, including wildlife friendly species, with trees, evergreen hedge and flower rich perennial planting. Species incorporated would include native fruiting and nectar-producing shrub species and trees, but the mix would also include non-native species with known biodiversity value. The planting scheme would not include any potentially invasive non-native species.
- Approximately 797 m² biodiverse green roof. The species mix for the biodiverse roof would comprise at least 20 species and include plants of known benefit for pollinators, including a number listed on the Royal Horticultural Society's (RHS) '*Plants for Pollinators*' list such as yarrow *Achillea millefolium*, vipers bugloss *Echium vulgare* and common cowslip *Primula veris*. Additional biodiversity features would be incorporated onto the roof such as log piles, stone piles and sand to attract invertebrates and provide nesting habitat for them.

A biodiversity net gain assessment has been carried out for the 2022 amended proposed development (1620009008-001_2_Paddington Green Police Station Replacement BNG) which demonstrates the percentage biodiversity gain that the 2022 amended proposed development would achieve.

For the retained street trees, root protection zones would be included, in accordance with BS 5837:2012 – '*Trees in relation to design, demolition and construction. Recommendations*¹⁵.

A Habitat Management Plan (HMP) would be produced for the site. This document will detail management activities necessary to cover up to the first 10 years of site operation and will contain, among other detail; information on planting regimens, mowing schedules and what to do should habitats fail.

A Biodiverse Roof Strategy (BRS) would be produced to detail management practices associated with biodiverse roofs. The aim of the document will be to ensure favourable condition of the biodiverse roof areas and maximise their potential ecological importance. The BRS would be read in conjunction with the roof maintenance information provided by the specialist roof contractor.

Both the HMP and BRS would be secured by means of a suitably worded planning condition.

If invasive species are identified during the planting process, the invasive plants would be discarded and disposed of appropriately. Plants imported from outside the UK would be avoided to prevent introducing invasive species.

4.2.3 Species

Invertebrates

Provision of landscape planting with known biodiversity importance, as well as green infrastructure would be of benefit to invertebrate species using the site, and once established, would provide enhancement for invertebrates.

¹⁵ British Standards Institute (BSI), 2012. BS 5837:2012 – Trees in relation to design, demolition and construction. Recommendations. April 2012.

Invertebrate boxes or 'bee hotels' are proposed and would provide additional interest and enhancement for invertebrates such as bees. The exact number and type of box would be agreed following consultation with an ecologist prior to the build stage.

Breeding Birds

All wild nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended). As such, any tree removal and works to the trees on-site (such as pruning) would be undertaken between September and February, outside of the bird nesting season.

Feral pigeon can nest all year round, and therefore the demolition of the buildings would be undertaken following checks for nests. It may be necessary to consult a pest control specialist to prevent new nesting activity, in advance of demolition works. Records for peregrine in the vicinity and suitable nesting habitat in the tallest tower on the site mean that as a precaution, nesting checks would consider the potential presence of this species.

The provision of landscape planting within the 2022 amended proposed development would provide new habitat for use by foraging and nesting birds, enhancing the site for birds. Furthermore, a variety of bird nest box types would be provided at suitable locations on the site, attached to or built within buildings and other infrastructure, as mitigation for loss of habitat and additional enhancement. Boxes suitable for house sparrow, starling and swifts would be included. The exact type, number (expected to be a minimum of five) and location of bird boxes would be agreed following consultation with an ecologist prior to the build stage.

Bats

Provision of landscape planting and green infrastructure with native vegetation would potentially provide an enhancement opportunity for bats. The provision of bat boxes is not considered appropriate to this site due to its highly urban and well-lit nature.

4.3 Residual Effects

4.3.1 Designated Sites

Following the implementation of the CEMP and satisfactory establishment of the proposed habitat creation measures, the 2022 amended proposed development of the site is likely to result in the following residual effects at the demolition and construction and completed development stages:

- Demolition and Construction Stage: **No significant** effects; and
- Completed Development Stage: **No significant** effects.

4.3.2 Habitats

Following the implementation of the proposed landscaping scheme, as well the production of an appropriate HMP, the 2022 amended proposed development of the site is likely to result in the following residual effects at the demolition and construction and completed development stages:

- Demolition and Construction Stage: **No significant** effects; and
- Completed Development Stage: Following the establishment of habitats which may take at least ten years in the case of street trees, and provided habitats are managed appropriately, **Significant** Positive effects at the **Site** Level.

4.3.3 Species

Invertebrates

Following the implementation of the proposed landscaping scheme, as well the introduction of biodiversity features to provide habitat for invertebrates, the 2022 amended proposed development of the site is likely to result in the following residual effects at the demolition and construction and completed development stages:

- Demolition and Construction Stage: **No significant** effects; and
- Completed Development Stage: Following the establishment of habitats which may take up to three years for habitats suitable for invertebrates to develop, and provided habitat features for invertebrates are managed appropriately, **Significant** Positive effects at the **Site** Level.

Breeding Birds

Following works to trees and buildings at appropriate times of the year so as to avoid the bird breeding season and following appropriate checks, the implementation of the proposed landscaping scheme, as well the introduction of bird boxes; the 2022 amended proposed development of the site is likely to result in the following residual effects at the demolition and construction and completed development stages:

- Demolition and Construction Stage: **No Significant** effects; and
- Completed Development Stage: Following the establishment of habitats which may take up to three years for habitats suitable for birds to develop, and provided habitat features for birds are managed appropriately, **Significant** Positive effects at the **Local** Level.

Bats

Following the implementation of the proposed landscaping scheme, the 2022 amended proposed development of the site is likely to result in the following residual effects at the demolition and construction and completed development stages:

- Demolition and Construction Stage: **No Significant** effects; and
- Completed Development Stage: **No Significant** effects.

4.4 Summary

Table 4.1 contains a summary of the potential effects pre-mitigation, and likely residual effect post-mitigation. As can be seen, provided mitigation and enhancements are incorporated, the 2022 amended proposed development would likely lead to long-term positive effects for habitat, invertebrates, breeding birds and bats.

Table 4.1: Summary of Potential and Residual Effects			
Feature	Ecological Importance	Potential Effects	Likely Residual Effects following Mitigation
St Mary’s Churchyard and Paddington Green SINC	Borough	Demolition and Construction: Significant, Negative, Local Level Completed Development: Not Significant	Demolition and Construction: Not Significant Completed Development: Not Significant
Habitats	Site	Demolition and Construction: Significant, Negative, Site Level Completed Development: Significant, Positive, Site Level	Demolition and Construction: Not Significant Completed Development: Significant, Positive, Site Level

Table 4.1: Summary of Potential and Residual Effects			
Feature	Ecological Importance	Potential Effects	Likely Residual Effects following Mitigation
Invertebrates	Negligible	Demolition and Construction: Not Significant Completed Development: Significant, Positive, Site Level	Demolition and Construction: Not Significant Completed Development: Significant, Positive, Site Level
Birds	Site	Demolition and Construction: Significant, Negative Site Level Completed Development: Significant, Positive, Local Level	Demolition and Construction: Not Significant Completed Development: Significant, Positive, Local Level
Bats	Negligible	Demolition and Construction: Not Significant Completed Development: Not Significant	Demolition and Construction: Not Significant Completed Development: Not Significant

5. CONCLUSIONS

The updated extended Phase 1 habitat survey and bat inspection surveys confirmed that the site is of nature conservation importance at up to the Site level. Opportunities for significant enhancement of the site’s biodiversity are possible, through the provision of new landscape planting including trees and green infrastructure. By undertaking the work in accordance with the commitments and recommendations made in this report, the 2022 amended proposed development is not likely to give rise to any significant negative effects and several significant positive effects in respect of habitats, birds and invertebrates during the completed development stage.

Furthermore, a biodiversity net gain substantially in excess of 10 % would be achieved and this is demonstrated in the biodiversity net gain assessment (1620009008-001_2_Paddington Green Police Station Replacement BNG). Following the implementation of the mitigation and enhancement measures recommended in this report, negative impacts on biodiversity will be avoided, and in the long term the 2022 amended proposed development will provide benefits to biodiversity.

APPENDIX 1 – PHASE 1 HABITAT MAP

APPENDIX 2 - RELEVANT LEGISLATION AND POLICY

Ecological features are protected under various United Kingdom (UK) and European legislative instruments. These are described below.

Legislation

The Environment Act 2021

The Environment Act 2021 brings in several key provisions relating to biodiversity and the natural world. The act empowers the Secretary of State to set environmental targets including in the priority area of biodiversity and to develop environmental improvement plans. It also establishes an Office for Environmental Protection to contribute to environmental protection and the improvement of the natural environment. The act mandates biodiversity net gain in new developments and requires the development of local nature recovery strategies as well as setting out the mechanism for conservation covenants that conserve the natural environment of land or the natural resources of land.

The Conservation of Habitats and Species Regulations 2017 (As Amended)

The Habitats Directive (Council Directive 92/43/EEC)¹⁶ came into force in 1992 and provides for the creation of a network of protected wildlife areas across the European Union (EU), known as 'Natura 2000'. The Natura 2000 network consists of Special Areas of Conservation (SAC) designated under the Habitats Directive and Special Protection Areas (SPA) designated under the Birds Directive (Council Directive 79/409/EEC)¹⁷. These sites are part of a range of measures aimed at conserving important or threatened habitats and species.

The Conservation of Habitats and Species Regulations 2017¹⁸ (commonly known as the 'Habitats Regulations') transposes the Habitats Directive into national law and set out the provisions for the protection and management of species and habitats of European importance, including Natura 2000 sites. The 2017 bill consolidated all previous versions of the regulations and subsequent amendments since initial transposition, bringing them all under the single heading, and made some minor amendments. It extends to England and Wales, and to a limited extent Scotland and Northern Ireland. Further amendments were made via The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018¹⁹ to ensure they reflect recent European case law (C-323/17 People Over Wind and Sweetman v Coillte Teoranta) in relation to the assessment of plans and projects on sites protected under Council Directive 92/43/EEC on the conservation of natural habitats of wild fauna and flora (the 'Habitats Directive'). In Scotland, the Habitats Directive is transposed through a combination of the Habitats Regulations 2010 (in relation to reserved matters) and the Conservation (Natural Habitats &c.) Regulations 1994. The Conservation (Natural Habitats, &c) Regulations (Northern Ireland) 1995 (as amended) transposes the Habitats Directive in relation to Northern Ireland.

In addition to providing for the designation and protection of Natura 2000 sites, the Habitats Regulations provide strict protection for plant and animal species as European Protected Species. Derogations from prohibitions are transposed into the Habitats Regulations by way of a licensing regime that allows an otherwise unlawful act to be carried out lawfully for specified reasons and providing certain conditions are met. Under the Habitats Regulations, competent authorities have a general duty, in the exercise of any of their functions, to have regard to the Habitats Directive and Wild Birds Directive including in the granting of consents or authorisations. They may not

¹⁶ European Commission, 1992. Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora.

¹⁷ European Commission, 1979. Council Directive 79/409/EEC on the conservation of wild birds.

¹⁸ Her Majesty's Stationery Officer (HMSO), 2017. The Conservation of Habitats and Species Regulations 2017. HMSO.

¹⁹ Her Majesty's Stationery Officer (HMSO), 2018. The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018. HMSO.



authorise a plan or project that may adversely affect the integrity of a European site, with certain exceptions (considerations of overriding public interest).

The Conservation of Habitats and Species Regulations 2017, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, require the Secretary of State and Welsh Ministers to secure compliance with the requirements of the Nature Directives. Any new powers in the 2019 Regulations must be exercised in line with the Directives and retained EU case law up to 1 January 2021.

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019²⁰

SACs and Special Protection Areas (SPAs) in the UK no longer form part of the EU’s Natura 2000 ecological network. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 have created a national site network on land and at sea, including both the inshore and offshore marine areas in the UK. The national site network includes:

- existing SACs and SPAs; and
- new SACs and SPAs designated under these Regulations.

Any references to Natura 2000 in The Conservation of Habitats and Species Regulations 2017, as amended and in guidance now refers to the new national site network. Maintaining a coherent network of protected sites with overarching conservation objectives is still required in order to:

- fulfil the commitment made by government to maintain environmental protections
- continue to meet our international legal obligations, such as the Bern Convention, the Oslo and Paris Conventions (OSPAR), Bonn and Ramsar Conventions

Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap with SACs and SPAs, and may be designated for the same or different species and habitats. All Ramsar sites remain protected in the same way as SACs and SPAs.

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 establish management objectives for the national site network. These are called the network objectives.

The UK Government and devolved administrations (in Wales, Northern Ireland and Scotland) will cooperate to manage, and where necessary, adapt the network to contribute towards meeting the network objectives.

Any references in the 2017 Regulations to meeting the ‘requirements of the Directives’ includes achieving the network objectives.

The appropriate authorities may publish guidance relating to these requirements. The appropriate authorities are the Secretary of State for Environment, Food and Rural Affairs in England and the Welsh Ministers in Wales.

The network objectives are to:

- maintain or, where appropriate, restore habitats and species listed in Annexes I and II of the Habitats Directive to a favourable conservation status (FCS)
- contribute to ensuring, in their area of distribution, the survival and reproduction of wild birds and securing compliance with the overarching aims of the Wild Birds Directive

The appropriate authorities must also have regard to the:

²⁰ Secretary of State (2019) The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Her Majesty’s Stationery Office (HMSO)

- importance of protected sites
- coherence of the national site network
- threats of degradation or destruction (including deterioration and disturbance of protected features) on SPAs and SACs

The network objectives contribute to the conservation of UK habitats and species that are also of pan-European importance, and to the achievement of their FCS within the UK.

The Countryside and Rights of Way Act 2000

The Countryside and Rights of Way Act 2000²¹ primarily extends to England and Wales. It provides a new statutory right of access to the countryside and modernises the rights of way system, bringing into force stronger protection for both wildlife and the countryside.

The Act is divided into five distinct sections, Part III is of relevance to ecology:

- Part III – Nature Conservation and Wildlife Protection: The Act details measures to promote and enhance wildlife conservation. These measures include improving protection for Sites of Special Scientific Interest (SSSI) and increasing penalties for deliberate damage to SSSIs. Furthermore, the Act affords statutory protection to Ramsar Sites which are wetlands designated under the International Convention on Wetlands²².

The Wildlife and Countryside Act 1981 (As Amended)

The Wildlife and Countryside Act 1981 (as amended)²³ forms the basis of much of the statutory wildlife protection in the UK. Part I deals with the protection of plants, birds and other animals and Part II deals with the designation of SSSIs.

This Act covers the following broad areas:

- Wildlife – listing endangered or rare species in need of protection and creating offences for killing, disturbing or injuring such species. Additionally, the disturbance of any nesting bird during breeding season is also noted as an offence, with further protection for species listed on Schedule 1. Measures for preventing the establishment of non-native plant and animal species as listed on Schedule 9 are also provided;
- Nature Conservation – protecting those sites which are National Nature Reserves (NNR) and SSSIs;
- Public Rights of Way – placing a duty on the local authority (to maintain a definitive map of footpaths and rights of way. It also requires that landowners ensure that footpaths and rights of way are continually accessible; and
- Miscellaneous General Provisions.

The Act is enforced by local authorities.

²¹ Her Majesty’s Stationery Officer (HMSO), 2000. The Countryside and Rights of Way Act 2000. HMSO.

²² United Nations Educational, Scientific and Cultural Organization (UNESCO), 1971. Convention on Wetlands of International Importance especially as Waterfowl Habitat, as amended in 1982 and 1987. Ramsar, Iran Published in Paris, 1994.

²³ Her Majesty’s Stationery Office (HMSO), 1981. The Wildlife and Countryside Act 1981 [as amended in Quinquennial Review and by the Countryside and Rights of Way Act 2000 and the Natural Environment and Rural Communities Act 2006]. HMSO.

Natural Environment and Rural Communities Act 2006

Under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006²⁴, public authorities must show regard for conserving biodiversity in all their actions. Public authorities should consider how wildlife or land may be affected in all the decisions that they make. The commitment to the biodiversity duty must be measured by public authorities.

Section 41 also requires the Secretary of State to publish a list of habitats and species that are of principal importance for the conservation of biodiversity in England.

Protection of Badgers Act 1992

The Protection of Badgers Act 1992²⁵ consolidated previous legislation relating specifically to badgers. The Act makes it an offence to kill, injure or take a badger, or to damage or interfere with a sett unless a licence is obtained from a statutory authority (i.e. Natural England).

Wild Mammals (Protection) Act 1996

The Wild Mammals (Protection) Act 1996²⁶ makes it an offence for any person to mutilate, kick, beat, nail or otherwise impale, stab, burn, stone, crush, drown, drag or asphyxiate any wild mammal with intent to inflict unnecessary suffering. There are certain exemptions including acts of mercy and acts made lawful by means of hunting, shooting, coursing or pest control activities.

Policy

Biodiversity in the Planning Process

Administrative and policy guidance on the application of some of these statutory obligations is provided through relevant Government policy guidance and advice. In England, this includes National Planning Policy Framework 2019, national Planning Practice Guidance, Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System, Biodiversity 2020 and Natural Environment White Paper ‘The natural choice: securing the value of nature’.

National Planning Policy Framework (2022)

The National Planning Policy Framework (NPPF)²⁷ sets out the Government’s planning policies for England and how these are expected to be applied. Objective 15 - Conserving and enhancing the natural environment’ states that the planning system should contribute to and enhance the natural and local environment by:

- "...protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils;
- recognising... the wider benefits from natural capital and ecosystem services; and
- minimising impacts on and providing net gains in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures..."

It furthermore advises local planning authorities to conserve and enhance biodiversity when considering planning applications, by applying principles aimed at protecting and enhancing biodiversity and designated sites and incorporating biodiversity in and around developments

²⁴ Her Majesty’s Stationery Office (HMSO), Natural Environment and Rural Communities Act 2006. HMSO.
²⁵ Her Majesty’s Stationery Office (HMSO), 1992. Protection of Badgers Act 1992. HMSO.
²⁶ Her Majesty’s Stationery Office (HMSO), Wild Mammals (Protection) Act 1996. HMSO.
²⁷ Ministry of Housing, Communities and Local Government, 2022. National Planning Policy Framework. London: HMSO.

Planning Practice Guidance

The Planning Practice Guidance²⁸ is a web-based resource. This guidance is divided into sections, of which Natural Environment: Biodiversity, geodiversity and ecosystems and Green Infrastructure provide information on biodiversity issues within planning and guidance on where to find further information on biodiversity issues.

Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System

This circular²⁹ provides administrative guidance on the application of the law relating to planning and nature conservation as it applies in England. It complements the national planning policy in the NPPF and PPG.

Natural Environment White Paper. The Natural Choice: Securing the Value of Nature

The Natural Environment White Paper³⁰ outlines the Government’s vision for the natural environment over the next 50 years, shifting the emphasis to an integrated landscape-scale approach. It describes the actions that will be taken to deliver that goal.

Biodiversity Action Plans (BAP)

In 1994, the Government produced the UK Biodiversity Action Plan (BAP)³¹, a national strategy for the conservation of biodiversity. This led to the creation of the UK Biodiversity Steering Group, which has listed 1,150 Species Action Plans (SAPs) and 65 Habitat Action Plans (HAPs). Regional and District/Borough BAPs apply the UK BAP at a local level.

From July 2012, the ‘UK Post-2010 Biodiversity Framework’³² succeeds the UK BAP. This is a result of a change in strategic thinking following the publication of the ‘Convention on Biological Diversity’s Strategic Plan for Biodiversity 2011-2020’³³ and its 20 ‘Aichi targets’³⁴, at Nagoya, Japan in October 2010, and the launch of the new EU Biodiversity Strategy (EUBS) in May 2011.

The UK Post-2010 Biodiversity Framework constitutes the UK’s response to these new ‘Aichi’ strategic goals and associated targets. The Framework recognises that most work which was previously carried out under the UK BAP is now focussed on the individual countries of the UK (and Northern Ireland) and delivered through each countries’ own strategies.

Following the publication of the new Framework, the UK BAP partnership no longer operates. However, many of the tools and resources originally developed under the UK BAP remain of use. The UK list of priority species has been used to help draw up statutory lists of priorities in England, Scotland, Wales and Northern Ireland. For England, this is in line with Section 41 of NERC.

²⁸ Ministry of Housing, Communities & Local Government. Planning Practice Guidance [online]. Available at: <http://planningguidance.planningportal.gov.uk/>. Accessed October 2022.
²⁹ Office of the Deputy Prime Minister, 2005. Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System. Available at: <https://www.gov.uk/government/publications/biodiversity-and-geological-conservation-circular-06-2005>
³⁰ Department for Environment, Food and Rural Affairs (Defra), 2011. Natural Environment White Paper. The natural choice: securing the value of nature. Available at: <https://www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature>
³¹ Her Majesty’s Stationery Office (HMSO), 1994. Biodiversity: The UK Action Plan. HMSO.
³² JNCC and Defra (on behalf of the Four Countries' Biodiversity Group), 2012. UK Post-2010 Biodiversity Framework. July 2012. jncc.defra.gov.uk/pdf/UK_Post2010_Bio-Fwork.pdf
³³ <https://www.cbd.int/sp/>
³⁴ <https://www.cbd.int/sp/targets/>

Regional Policy

London Biodiversity Action Plan (2007)

The overarching biodiversity action plan for the Greater London area is contained within the London BAP³⁵. This sets out the priority habitats and species for the area and provides action plans for these priority habitats and species, as listed in the table below. Further important habitats and species do not currently have their own BAPs; these are also listed in the table below. The London Biodiversity Partnership was disbanded in 2013.

London BAP Habitats	London BAP Species
Acid grassland	Bats
Chalk grassland	Black poplar
Heathland	House sparrow
Parks and urban greenspaces	Mistletoe
Private gardens	Reptiles
Reed beds	Sand martin
Rivers and streams	Stag beetle
Standing water	Water vole
Tidal Thames	Other Important Species
Wasteland	Black redstart
Woodland	Common dormouse
Other Important Habitats	Grey heron
Built structures	Otter
Meadows and pastures	Peregrine falcon
Fen, marsh and swamp	
Open landscapes with ancient/old trees	

The Mayor’s Biodiversity Strategy (2002)

The Mayor’s Biodiversity Strategy³⁶ aims to protect and enhance the natural habitats of London together with their species. It presents 14 detailed policies and 72 implementation proposals around a number of themes including the protection of biodiversity, blue ribbon network, managing wildlife habitats and connecting people to nature.

Of note are the following proposals:

- Proposal 5: The Mayor will, and boroughs should, take account of the protection of wildlife habitats and biodiversity in the consideration of all planning applications; and
- Proposal 8: Where biodiversity assessments are submitted, the Mayor expects the options to be refined only after full investigation of the existing ecological conditions and consideration of the potential impacts of options.

³⁵ London Biodiversity Partnership, 2007. London Biodiversity Action Plan.: <http://www.gigl.org.uk/about-gigl/londons-biodiversity-action-plan/>

³⁶ Greater London Authority, 2002. Connecting with London’s Nature - The Mayor’s Biodiversity Strategy. London. GLA

The London Plan, 2021

The London Plan 2021³⁷ is the statutory spatial development strategy for the Greater London area. Policies of particular relevance to ecology are:

- Policy G1: Green Infrastructure;
- Policy G5: Urban Greening;
- Policy G6: Biodiversity and Access to Nature; and
- Policy G7: Trees and Woodlands.

Policy G1 Green Infrastructure states:

A. London’s network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits.

B. Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network consistent with Part A.

C. Development Plans and area-based strategies should use evidence, including green infrastructure strategies, to:

- 1) identify key green infrastructure assets, their function and their potential function
- 2) identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.

D. Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London’s wider green infrastructure network.

Policy G5 Urban Greening states:

A. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

B. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).

C Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B).

Policy G6 Biodiversity and Access to Nature states:

A. Sites of Importance for Nature Conservation (SINCs) should be protected.

B. Boroughs, in developing Development Plans, should:

- 1) use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks

³⁷ Greater London Authority. 2021. The London Plan: The Spatial Development Strategy For London. https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf.

- 2) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
- 3) support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
- 4) seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
- 5) ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.

C. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

- 1) avoid damaging the significant ecological features of the site
- 2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
- 3) deliver off-site compensation of better biodiversity value.

D. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

E. Proposals which reduce deficiencies in access to nature should be considered positively.

Policy G7 Trees and Woodland states:

A. London’s urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London’s urban forest – the area of London under the canopy of trees.

B. In their Development Plans, boroughs should:

- 1) protect ‘veteran’ trees and ancient woodland where these are not already part of a protected site
- 2) identify opportunities for tree planting in strategic locations.

C. Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

Local Policy

Westminster City Plan 2019-40

The Westminster City Plan 2022³⁸ sets out the spatial development plan for the City of Westminster. Policy 34: Green Infrastructure states that the council will protect and enhance the city’s green infrastructure to maximise its environmental, social and economic value. All development brought forward in the city should contribute to the greening of Westminster by

³⁸ Westminster City Council (2022); City Plan 2022-2040. City of Westminster, London

stincorporating trees, green walls, green roofs, rain gardens and other green features and spaces into the design of the scheme.

Sites of Importance for Natural Conservation (SINCs), priority habitats and other ecological features outside of the SINCs network will be protected.

Developments should achieve biodiversity net gain, wherever feasible and appropriate. Opportunities to enhance existing habitats and create new habitats for priority species should be maximised. Developments within areas of nature deficiency should include features to enhance biodiversity, particularly for priority species and habitats.

Trees of amenity, ecological and historic value and those which contribute to the character and appearance of the townscape will be protected. The planting of trees to optimise the city’s canopy cover will be encouraged in new developments.

Westminster Environmental Supplementary Planning Document 2022

The Environmental Supplementary Planning Document (SPD)³⁹ builds upon environmental policy within the City Plan to guide developers on environmental responsibilities.

The section on Green Infrastructure sets out the Urban Greening Factor methodology (as described in the London Plan Policy G5 and recognises the multi-functionality of green infrastructure, in line with the Wild West End Matrix. It further sets out recommendations for developers to consider inclusion of:

- Green roofs;
- Green walls;
- SuDS features; and
- Trees.

Westminster Biodiversity Action Plan 2008

Westminster's Biodiversity Action Plan⁴⁰ has been produced by the Westminster Biodiversity Partnership, and aims to prevent the decline of - and improve conditions for - species and habitats that are a conservation priority.

Those listed are:

Habitats

- Built Environment;
- Churchyards and Cemeteries;
- Parks and Green Spaces;
- Private Gardens;
- Standing Open Water; and
- Tidal Thames.

Species

- Bats,
- Buttoned Snout Moth;
- Hedgehog;

³⁹ Westminster City Council (2022); Environmental Supplementary Planning Document. City of Westminster, London
⁴⁰ Westminster Biodiversity Partnership. 2008. Westminster Biodiversity Action Plan. Available online: <https://www.westminster.gov.uk/biodiversity-action-plan#:~:text=Westminster's%20Biodiversity%20Action%20Plan%20aims,to%20improving%20biodiversity%20in%20Westminster.>

- House Sparrow; and
- Tawny Owl.

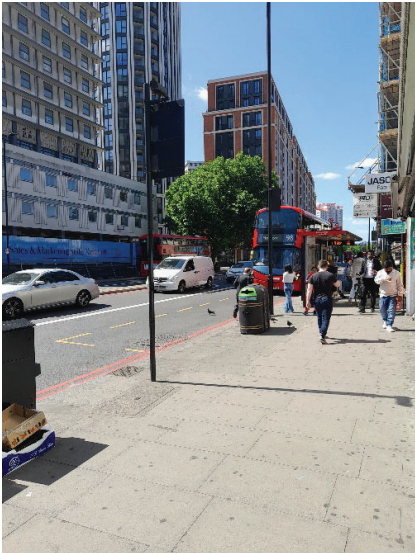
Westminster Open Spaces and Biodiversity Strategy, 2019

This strategy⁴¹ has a number of priorities, with associated commitments. The priorities include:

- Protecting existing green assets;
- Prioritising city greening by creating new green infrastructure
- Biodiversity and Wildlife;
- High standards; and
- Managing and balancing demands

⁴¹ City of Westminster. 2019. Westminster Open Spaces and Biodiversity Strategy. Available online: https://www.westminster.gov.uk/sites/default/files/draft_strategy_for_open_spaces_and_biodiversity.pdf

APPENDIX 3 - SITE PHOTOGRAPHS



View: Edgware Road Looking North



View: Harrow Road Looking West



View: North-Eastern Corner of Site



View: Newcastle Place looking East



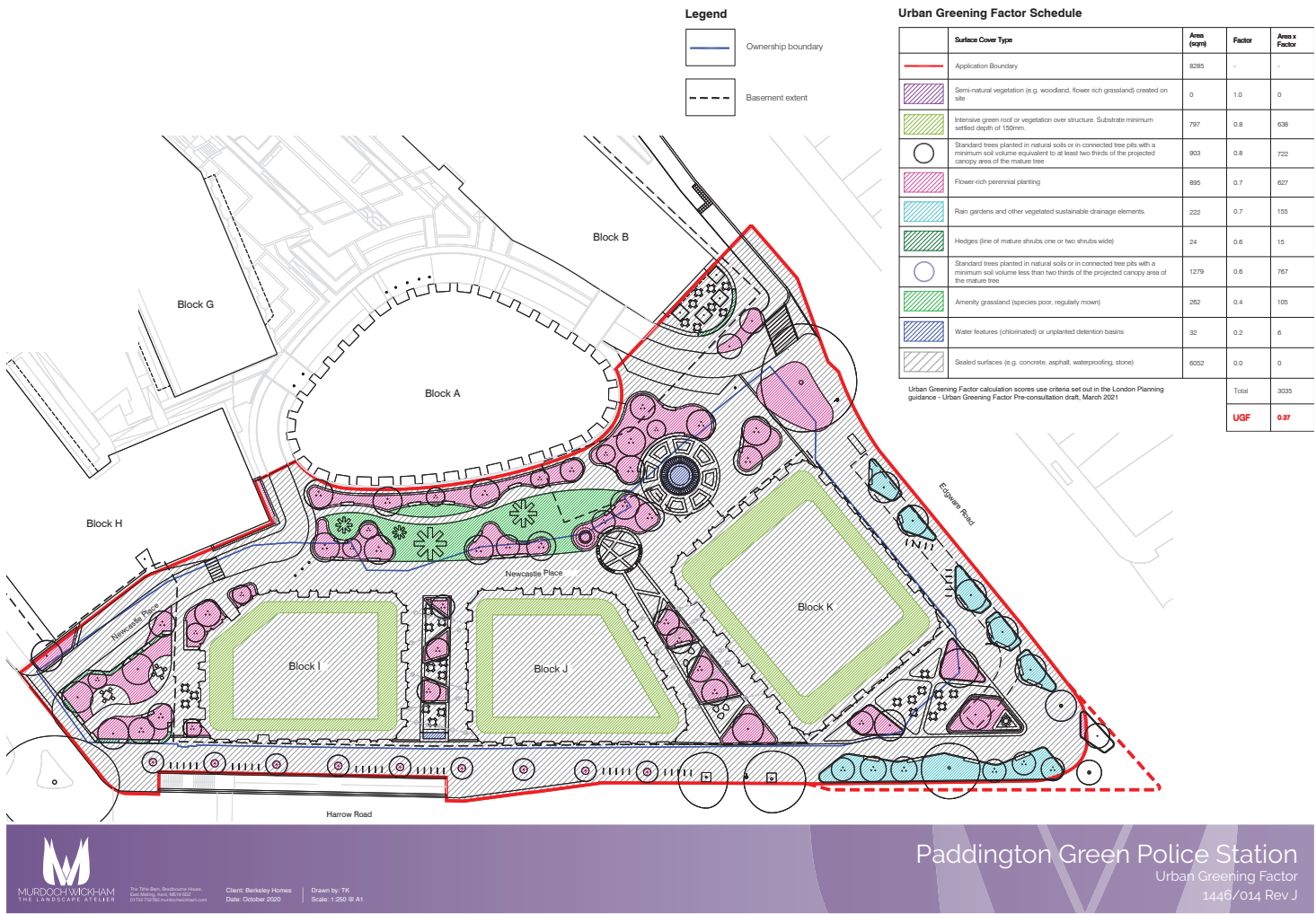
View: On-site Looking East



View: On-site 17 Storey

APPENDIX 4 - LANDSCAPE PROPOSALS





Technical Appendix 2.5(R): Ground Conditions Preliminary Risk Assessment

Intended for
Berkeley Homes (Central London) Limited

Date
November 2022

Project Number
1620009008-001

PADDINGTON GREEN POLICE STATION REPLACEMENT GROUND CONDITIONS PRELIMINARY RISK ASSESSMENT



PADDINGTON GREEN POLICE STATION REPLACEMENT GROUND CONDITIONS PRELIMINARY RISK ASSESSMENT

Project No. 1620009008-001
Issue No. Final
Date November 2022
Made by Lucy Baker/Jessica Gregory/Sophie Davies
Checked by Matthew Pannett/Daniel Hamp
Approved by Michelle Wheeler

Made by: 

Checked/Approved by: 

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Version Control Log

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EXECUTIVE SUMMARY

Ramboll UK Limited was commissioned by Berkeley Homes (Central London) Limited to carry out an updated Ground Conditions Preliminary Risk Assessment in respect of redevelopment proposals for a site located at 2-4 Harrow Road, Paddington, London, W2 1XJ. The updated assessment is required in respect of the site’s proposed redevelopment for a residential-led scheme.

A full planning application was submitted for the residential-led scheme in April 2021 under application reference 21/02193/FULL. A Ground Conditions Preliminary Risk Assessment accompanied the application as a technical appendix to the Environmental Statement.

The Westminster City Council planning committee subsequently resolved to refuse the application contrary to the officers’ recommendation for approval. The application was ‘called in’ by the Greater London Authority and since then amendments to the redevelopment proposals have been made in consultation with the Greater London Authority.

An updated ground conditions preliminary risk assessment has been undertaken of the amended redevelopment proposals. Where relevant, consideration has been given to changes in baseline conditions; any new and emerging legislation, policy and assessment methodology requirements due to the passing of time.

The fully updated ground conditions preliminary risk assessment is reported in this Replacement report.

The objectives of the assessment were to consider the potential for soil or groundwater contamination, both at and in the study area of the site.

The site is occupied by Newcastle Place (a roadway) and Paddington Green Police Station, which have been present in this location since the 1970s. The on-site buildings and car parking area are underlain by a single level basement. A site inspection undertaken in 2020 found evidence of oil storage for boilers within the basement and on the ground floor. This oil storage appeared to be in dedicated plant rooms, which reduces the risk of ground contamination occurring from oil spills or leaks. No other significant potentially contaminative activities were identified during the site inspection. The Applicant has confirmed that site conditions remain unchanged and accordingly the site visit undertaken in September 2020 is considered to remain valid.

Historically - early and mid-20th century - the site was occupied by multiple units with the potential to cause ground contamination. These included part of a garage with a sunk petrol tank, a timber store, smithy, wood working workshop, slaughterhouse, garage and theatre. These activities were cleared in the late 1960s and the site was used as a coach park. The Police Station was developed in the early 1970s. Potential historic ground contaminants could include oils and fuels, asbestos fibres, metals, volatile organic compounds and other hydrocarbon compounds. Made Ground/fill of unknown composition is likely to be present due to past redevelopments.

The study area has historically included potentially contaminative light industrial uses including garages, workshops, warehouses, factories, tramway and a sawmill. Historic building plans from the mid-1950s to 1970 show a garage (partially on-site) extended off-site to the north undertaking oil storage and paint spraying facilities. Potential contaminants from these off-site sources are similar to the site’s history. The site is not particularly identifiable from its surroundings and a background level of contamination is likely to be present in the study area.

Westminster City Council has stated that in Westminster there are currently no contaminated land sites or ‘Special Sites’ as they are known under the Environmental Protection Act 1990 within their jurisdiction, and the Environmental Health Department have stated that there are no known ground contamination issues associated with the site.

The site is located within a low sensitivity location with regard to groundwater resources. Both the superficial deposits and natural bedrock underlying the site and immediate surrounding area are classified as Unproductive Strata. The site is not located within a Groundwater Source Protection Zone and there are no groundwater abstractions for public potable water supply within a 2 km radius.

The site is also located within a low sensitivity area with regard to surface water resources. The nearest surface watercourse is the Paddington Basin approximately 150 m south, connecting to the Grand Union Canal and Regents Canal at the junction of Little Venice 750 m north-west of the site. There are two surface water abstractions within 2 km of the site; however, none of the abstractions are for sensitive uses such as for public potable water supply.

The site is located within Flood Zone 1 (Low Probability).

Potential pollutant linkages associated with the history of the site include risks to human health from dermal contact, inhalation and ingestion of contaminated soils and risks from vapours or ground gases migrating into new buildings. Future building cover and clean soils in landscaping could mitigate some potential pollutant linkages (i.e. providing a barrier to the soil). As is standard for a brownfield site redevelopment, potential risks would be assessed through a site investigation and risk assessment. The investigation and risk assessment would be undertaken at an appropriate point before redevelopment work starts on-site. Remediation works cannot be completely ruled out until the investigation and risk assessment have been undertaken; however, given that the basement excavation would remove potentially contaminated soil, the requirement for extensive remediation is considered unlikely.

Development works would also consider the potential for contamination to be present and how this is managed. For example, this could include health and safety of workers, piling risk assessment, Sustainable Drainage System (SuDS) assessment, appropriate classification of contaminated soils and potential for asbestos and other contaminants to be present. Hazardous materials in buildings, such as oil tanks and asbestos, would also be considered and measures taken to prevent pollution during demolition and construction.

On the basis of the above, significant adverse environmental effects are considered unlikely. Site Investigation Works and associated remediation and validation works (if necessary) would be secured by means of an appropriately worded planning condition.

1. INTRODUCTION

1.1 Background

Ramboll UK Limited was commissioned by Berkeley Homes (Central London) Limited (the 'Applicant') to carry out an updated Ground Conditions Preliminary Risk Assessment in respect of redevelopment proposals for a site at 2-4 Harrow Road, Paddington, W2 1XJ (the 'site'). The update assessment is required in respect of the site's proposed redevelopment for a residential-led scheme.

A full planning application (the 'application') was submitted by the Applicant on 1 April 2021 for the residential-led redevelopment proposals (the '2021 proposed development') of the site under application reference 21/02193/FULL. A Ground Conditions Preliminary Risk Assessment accompanied the application as a technical appendix to the Environmental Statement ('2021 Ground Conditions Preliminary Risk Assessment').

The application was considered at the Westminster City Council (WCC) planning committee on 9 September 2021. WCC officers made a recommendation for approval. The planning committee resolved to refuse the application contrary to the officers' recommendation for the following suggested reasons (in summary):

- Due to the excessive height and bulk, Block K would have a detrimental impact on the local townscape, would result in substantial harm to the setting of the Little Venice, Paddington Green, Lisson Grove and Maida Vale Conservation Areas and have a detrimental impact on views from Regents Park and Hyde Park;
- The proposed development fails to maximise the number of dual aspect flats within Blocks I and J, resulting in poor levels of natural daylight and outlook due to the proximity of the existing buildings within West End Gate; and
- Due to the excessive height and bulk of the proposed blocks, the proposed development would result in a significant loss of daylight and sunlight to existing residential properties.

The application was subsequently referred to the Greater London Authority (GLA) for 'Stage 2' review. Following a review of the application and the proposed decision of WCC, the GLA considered that the proposed development was of strategic importance and had the potential to make an important contribution to housing and affordable housing supply. On 22 November 2021 the GLA directed that the Mayor of London would act as the local planning authority for the purpose of determining the application. Since then amendments have been made to the proposed development in consultation with the GLA (the '2022 amended proposed development').

The updated assessment has been undertaken to assess the amended redevelopment proposals. Where relevant, consideration has been given to changes in baseline conditions; any new and emerging legislation, policy and assessment methodology requirements due to the passing of time.

The fully updated ground conditions preliminary risk assessment are reported in this Replacement report, hereafter referred to as the '2022 Replacement Ground Conditions Preliminary Risk Assessment'. Accordingly, the reader should disregard the 2021 Ground Conditions Preliminary Risk Assessment.

1.2 Objectives

1.3 The objectives of the updated assessment were to assess the potential for soil or groundwater contamination, both at and in the study area of the site. Scope of Works

The scope of the 2022 Replacement Ground Conditions Preliminary Risk Assessment (PRA) comprised the following:

- Review of historical, recent and current Ordnance Survey plans to identify activities which might have led to contamination of soil or groundwater (for example, from manufacturing processes, from storage activities or waste disposal practices) both on the site and on adjacent sites;
- Review of published records and drawings on the shallow and deep geology and hydrogeology of the site to assess the vulnerability and sensitivity of groundwater and surface water resources to contamination, if present, and the possible direction of movement off site, if mobile;
- Search of a proprietary database of environmental permits, records and incidents at the site and surrounding study area;
- Enquiries of the WCC and WCC Environmental Health Departments to obtain information on environmental conditions, incidents and known contamination risks and on the WCC's Contaminated Land Strategy;
- Enquiries of the Petroleum Enforcement Authority to determine if records exist of above ground or below ground licensed (petrol) storage facilities; and
- A site visit undertaken in 2020, which is considered to remain valid following confirmation by the Applicant of on-site conditions.

1.3.1 Scope of Works Notable Exceptions and Restrictions

No sampling or analysis of soils, waters or other materials has been carried out as part of the updated assessment.

The updated assessment did not include an audit of operational environmental compliance issues or environmental compliance requirements associated with close-down of operations and site exit.

The updated assessment specifically excluded a detailed assessment as to the presence and condition of asbestos or asbestiform containing materials at the site.

1.4 Proposed Redevelopment

The planning application description of the proposed development is as follows:

"Demolition of the existing building and redevelopment of the site to provide three buildings of 39, 24 and 17 storeys in height, providing residential units (including affordable units)(Class C3), commercial uses (Class E), a community use (Class F.2), landscaping, tree and other planting, public realm improvements throughout the site including new pedestrian and cycle links, provision of public art and play space, basement level excavation to provide associated plant, servicing, disabled car parking and cycle parking and connection through to the basement of the neighbouring West End Gate development."

The proposed land uses would comprise the following:

- 556 homes, including 219 affordable housing units (Class C3);
- 1,362 m² GEA flexible commercial and community space (Class E and F2);
- Servicing, disabled parking and cycle parking at basement level; and
- High temperature Air Source Heat Pump energy strategy for both residential and commercial uses, with connection to the West End Gate (WEG) basement and energy centre for resilience purposes only.

The proposed building heights would be as follows:

- Block I – ground plus 23 storeys (24 storeys in total);
- Block J - ground plus 17 storeys (18 storeys in total); and

- Block K - ground plus 38 storeys (39 storeys in total).

The proposed development would be car free with the exception of minimal disabled parking provision. The proposed basement would be over two levels (B1 and B2), with B1 comprising an extension of the existing basement level and B2 comprising a deeper level, but over a small footprint (see Appendix 1). It has been assumed that the formation level would be approximately 7- 10 m below existing ground level.

The majority of existing trees on-site would be removed. The following landscaping is proposed:

- Ground level landscaping including; lawns, bulbs, rain gardens and planters.
- Native hedgerow; and
- 77 new trees.

The following amendments have been made to the redevelopment proposals submitted to WCC in April 2021:

- Removal of Block I bullnose and movement of block footprint 8 m east;
- Reduction of Block J footprint width by 10 m;
- Increase in distance between Block I and Block J from 9 m to 10 m;
- Removal of Block K shoulder element;
- Removal of podium element (now three standalone blocks linked at basement level);
- Increase in the height of Block I from 62.020 m above ground floor finished floor level (FFL) (94.355 m AOD) (18 storeys) to 83.019 m above ground Floor FFL (115.219 m AOD) (24 storeys);
- Increase in the height of Block J from 54.145 m above ground floor FFL (86.480 m AOD) (15 storeys) to 60.389 m above ground floor FFL (92.724 m AOD) (17 storeys);
- Increase in the height of Block K from 110.720 m above ground floor FFL (143.055 m AOD) (32 storeys) to 133.969 m above ground floor FFL (166.304 m AOD) (39 storeys);
- Removal of roof level communal, residential amenity space at Block J;
- Removal of office floorspace and amenity space;
- Relocation of internal residential amenity space at Block K from level 25 to level 1;
- Amendment of residential unit / floorplate design to increase percentage of social rented units;
- Removal of all north facing single aspect residential units and increase in dual aspect residential units up to approximately 55 %;
- Amendments to core arrangement (all cores now have a dual staircase, with one staircase terminating at basement level and one terminating at ground floor level);
- Amendments to B2 footprint (overall minor increase), previously B2 accessed via Block J core terminating at B2 level, now accessed via Block I core terminating at B2 level and redesign of waste management services;
- Amendments to B1 footprint (reduction of the western extent and north-eastern extent), on account of the following layout changes:
 - Omission of office bin store, office lifts and office facilities;
 - Relocation of residential bin store in Block K further south, to suit the new location of the refuse chute;
 - Relocation of plant to the north;

- Complete stopping-up and partial pedestrianisation of Newcastle Place to vehicle traffic with the exception of fire / emergency access;
- Increase in ground level public realm provision from 3,553 m² to 4,755 m²;
- Reduction in external communal amenity space provision from 835 m² to 0 m²;
- Increase in play space provision from 1,138 m² to 1,150 m²;
- Fully updated landscape design proposals; and
- Amendments to glazing ratio and the addition of spandrel panels to the façade to improve energy performance.

The proposed development as amended by the proposed amendments is hereafter referred to as the '2022 amended proposed development'.

1.5 General Limitations and Reliance

This report has been prepared by Ramboll exclusively for the intended use by the Applicant in accordance with the agreement between Ramboll and the Applicant defining, among others, the purpose, the scope and the terms and conditions for the services. No other warranty, expressed or implied, is made as to the professional advice included in this report or in respect of any matters outside the agreed scope of the services or the purpose for which the report and the associated agreed scope were intended or any other services provided by Ramboll.

In preparation of the report and performance of any other services, Ramboll has relied upon publicly available information, information provided by the Applicant and information provided by third parties. Accordingly, the conclusions in this report are valid only to the extent that the information provided to Ramboll was accurate, complete and available to Ramboll within the reporting schedule.

Ramboll's services are not intended as legal advice, nor an exhaustive review of site conditions and/or compliance. Unless otherwise stated in this report, the scope of services, assessment and conclusions made assume that the site would continue to be used for its current purpose and end-use without significant changes either on-site or off-site.

Ramboll's scope of services for this assignment did not include collecting samples of any environmental media. Ramboll cannot rule out the existence of conditions, including, but not limited to, contamination not identified and defined by the data and information available to and/or obtained by Ramboll. Specifically, this assessment must not be considered as an asbestos survey (whether in built structures, waste, soils, etc.), even though the subject of asbestos-containing materials may have been discussed in the report.

2. SITE OBSERVATIONS

The following information was derived from a site visit undertaken on 17 September 2020 by Jessica Gregory of Ramboll UK Limited (Ramboll). Discussions were held with Ali Ahmed (Project Manager, Berkeley Group) and a site tour was provided by one of the members of the full-time security team. The purpose of the site visit was to assess whether there is potential for contamination from current activities. Internal access was restricted and, Ramboll’s visit was limited to external areas of the site, the basement and some of the vacant rooms on the ground, first and second floors. The Applicant has confirmed that site conditions remain unchanged and therefore the site visit undertaken in 2020 is considered to remain valid.

Figures showing the location of the site and site boundary are presented in Appendix 1. Photographs taken during the site visit are presented in Appendix 3.

2.1 Site Setting

The site is located at 2-4 Harrow Road, Paddington, London W2 1XJ to the immediate north of the A40 Westway, at National Grid Reference 526920, 181740. Vehicle access to the site is currently via Newcastle Place.

The site is located in an area of mixed-use including residential uses to the north, east, north-west and north-east and public open space in the form of Paddington Green to the west. Edgware Road is dominated by small scale commercial development including a street market. The Paddington Basin is located to the south, comprising larger scale mixed-uses including hotels, the Saint Mary’s Hospital, offices and residential uses. Westminster College Paddington Green campus is located to the north-west of the site and Edgware Road London Underground Station is located approximately 50 m to the east of the site.

Adjacent and surrounding land uses are summarised in Table 2.1.

Table 2.1: Adjacent and Surrounding Land Uses				
Direction	Distance	Occupant	Activities	Notes
North	Adjacent	Berkeley Homes	West End Gate development (ref: 16/12162/FULL)	Recently completed residential development
South	Adjacent	N/A	Harrow Road and the A40 road	N/A
East	Adjacent	N/A	Edgware Road	N/A
West	Adjacent	N/A	Paddington Green Road and open space	Public green space
North-West	Adjacent	N/A	14-17 Paddington Green (PG) development site (ref: 16/11562/FULL) under construction	Demolished and part of WEG construction site.

2.2 Site Layout and Activities

The site is approximately triangular, covering a total site area of 0.83ha.

The site is currently occupied by Newcastle Place (roadway) and Paddington Green Police Station, which has been present in this location since the 1970s.

The site was acquired by the Applicant in 2020 following the vacation of the site by the Metropolitan Police as part of their London wide estate and disposals strategy. In this regard, the neighbourhood policing function has been relocated to a new facility on Church Street. At the time of the site visit

undertaken for this assessment, the site was fully vacant. The Applicant has confirmed the Annex building on the western end of the site was in lawful use as construction offices between January 2021 and February 2022.

Approximately 30 % of the site is currently occupied by building cover; the remainder is occupied by concrete and asphalt hardstanding comprising a car parking/courtyard area while a single level of basement runs under the Police Station. Newcastle Place is present in the north of the site, providing both pedestrian and vehicular access between Paddington Green to the west and Edgware Road to the east of the site.

The site consists of the following:

- A single, interconnected building, albeit with a number of different, interrelated built forms, with hardstanding. This includes the 17 storey accommodation/section house on the eastern side of the site, a main office and police front of house 3-storey building below this on the eastern side of the site, and an 8 storey annex at the western side of the site, connected by a single storey building that previously housed high security cells;
- A single level of basement and a surface level podium car park to the rear, both accessed from Newcastle Place;
- Newcastle Place;
- An electricity substation in the north-eastern corner; and
- 13 existing trees.

The remaining areas of the site are formed of concrete, tarmac, cobble and paved hardstanding.

In addition to the electricity substation, a review of historical building plans indicates that a plant room for oil fuel heaters is located in the eastern extent of the basement (this area could not be accessed at the time of the site inspection). However, the associated external fill point was observed.

The ground surface of the site is generally level, ranging from between approximately 31 m and 32 m above ordinance datum (AOD). The car park/courtyard area is raised by approximately 1 m above Newcastle Place and, is access via two ramps located in the east and the west of the site. The basement car park is accessed via a ramp located in the east of the site. The site layout is presented in Figure 2.

At the time of Ramboll’s site inspection, part of the basement was temporarily being used for material storage and vehicle parking for the adjacent WEG development.

Ramboll’s visit was limited to external areas of the site, the basement and some of the vacant rooms on the ground, first and second floors. Internal access was restricted due to the presence of asbestos containing materials (ACMs).

No Environmental Permits are held by the site.

2.3 Storage of Chemicals and Hazardous Substances

2.3.1 Underground Storage Tanks (USTs)

Site personnel were not aware of the current or former presence of USTs at the site and no visual evidence of USTs, such as fill points, pumps, gauges, or signage, markings or concrete scarring indicative of such potential uses was identified during the visit. (Historic evidence of USTs is provided in Section 3).

2.3.2 Above Ground Storage Tanks (ASTs)

Site personnel were not aware of the current or former presence of ASTs at the site; however, Ramboll observed a fill point (labelled 35 sec oil) in the east of the site, adjacent to a roller shutter door. Based on a review of historical building plans, Ramboll understands that a plant room for oil fuel heaters is located in the eastern extent of the basement (this area could not be accessed at the time of the site inspection). An asbestos report for the site (see below for further details) indicates that a second oil tank is located on the ground floor of the building (room G.66) – this was not accessible to Ramboll during the site inspection.

A ‘silencer’ and associated generator was observed on the flat roof of the elongated low-rise structure connecting the eastern and western towers. Site personnel were unable to confirm the age of the generator; however, it was reported that the generator and the associated integrated fuel tank were out of use. No leaks of spills were observed within the vicinity of the generator.

The site is served by five or six lifts; site personnel reported that the associated lift motor rooms are located on the top floor of each tower. The lift motor rooms were not accessible at the time of the site inspection; however, it is considered likely that the lift motors may contain small hydraulic oil reservoirs. No spill or leak events were reported.

2.3.3 Other Bulk Storage

At the time of Ramboll’s site inspection the site was vacant, as such, site personnel reported that no hazardous substances were being stored at the site. Part of the basement was being temporarily used for material storage and vehicle parking associated with the adjacent WEG development construction site.

2.4 Water, Wastewater and Drainage

A drainage drawing for the site was not available for review by Ramboll during the site visit. Ramboll understands that the site is provided with mains drainage to the municipal foul sewer system. No oil-water interceptors were reported to be present on-site or identified on-site by Ramboll during the site visit; however, their presence or absence cannot be confirmed without review of comprehensive drainage drawings.

Site personnel had no knowledge of any legionella management exercise or whether a legionella risk assessment has been carried out.

Under the Health and Safety at Work Act 1974 and subsequent regulations, the dutyholder is required to assess the risk of Legionella exposure and put in place any necessary measures. The dutyholder may be the employer, or a person in control of the premises.

No current issues in relation to flooding were reported by the site contacts during the site visit.

2.5 Waste Storage and Disposal

With the exception of a full-time security presence, the site was vacant at the time of the site inspection. Therefore, wastes generated on-site predominantly comprised small quantities of domestic waste and recyclables. Waste was observed to be stored in one of two wheeled bins located in the west of the car park.

No visual evidence of staining or leaching from waste storage areas onto unsurfaced ground was noted. A review of waste documentation was outside the scope of this review.

2.6 Deleterious Materials

2.6.1 Asbestos Containing Materials

Given the age of the buildings (1970s), it is considered likely that asbestos containing materials (ACMs) were used during construction. An asbestos demolition survey report¹ for the site was provided for review after the site inspection. A total of four ‘medium risk’ materials were identified by Eton Environmental Group Ltd. (Eton), and 290 ‘low’ to ‘very low’ risk materials were reported to be present. Eton reportedly collected 198 samples during the demolition survey, 118 of which were confirmed to contain asbestos upon analysis. In total 174 assessments of strongly presumed asbestos were also made by Eton. The report recommended that all ACMs be removed from the site prior to demolition in compliance with the Control of Asbestos Regulations 2012.

Much of the internal floor space was inaccessible to Ramboll during the site inspection due to the known presence of damaged ACMs. Numerous materials labelled as containing asbestos were identified during the site visit.

The site contacts were unaware of any asbestos removal or management works having been undertaken.

Under the Control of Asbestos Regulations (2012), the dutyholder must manage the risk from asbestos on a premises and to develop and implement an ACM management plan, with review and updating as appropriate. The dutyholder is the party who has, by virtue of contract or tenancy, the main responsibility for maintenance or repair of the building.

An asbestos survey has not been undertaken by Ramboll as it is outside the scope of this assessment.

2.6.2 Refrigerant Gases

Site personnel reported that some of the disused office space was formally comfort cooled via electric air conditioning units. Ramboll understands that the associated air conditioning units are located on the tower roofs which could not be accessed at the time of the inspection. The refrigerant gas content of the units could not be confirmed therefore, the presence of R22 refrigerant gas cannot be ruled out.

Under the Fluorinated Greenhouse Gases (F-gas) Regulations 2015 (SI 2015/310) and Ozone-Depleting Substances (ODS) Regulations 2015 (SI 2015/168), ODS are to be phased out and must be recovered during servicing, maintenance and decommissioning. F-gas systems require leak testing and good record keeping. It is good practice to make sure that all equipment containing refrigerant gases is labelled with the type and amount of gas contained.

The responsibility for compliance with legislation regarding refrigerant gases would be expected to rest with the tenant as user/operator. Refrigerant gases are not generally considered to pose a ground contamination risk.

2.6.3 Polychlorinated Biphenyls (PCB)

An electricity substation which is reportedly operated by UK Power Networks is located in the north-eastern corner of the site, to the south of Newcastle Place. Responsibility for PCB oils (if present) would be expected to lie with the operator.

¹ Eton Environmental Group Ltd., Demolition Survey for Asbestos Containing Materials, Paddington Green Police Station, Job No. J041886, dated April 2020

Under the Polychlorinated Biphenyls Regulations 2000, the holder of equipment that contains PCBs must ensure it is decontaminated to less than 0.05% unless within an electrical transformer, which requires annual registration with the regulatory authorities.

As discussed above, the site is served by five or six lifts and, site personnel reported that the associated lift motor rooms are located on the top floor of each tower. The lift motor rooms were not accessible at the time of the site inspection; however, it is considered likely that the lift motors may contain small hydraulic oil reservoirs which may contain PCB-containing oils. No other potential PCB-containing equipment was identified during the site visit.

2.7 Air Emissions

No significant emissions to air were noted. Site personnel reported that the building was formally heated by gas powered boilers and comfort cooled via air conditioning units. Three air extraction/circulation units were observed in the basement; site personnel reported that these are now redundant. A moderate to strong hydrocarbon odour was observed by Ramboll in the east of the basement car park; Ramboll was unable to determine the source of the odour.

2.8 Other Issues

According to the site contacts, there is no known history of complaints, enforcements or other regulatory actions regarding the site or immediate surrounding properties related to environmental conditions. No fire or spill events were reported. No flooding of the site is known to have occurred historically, according to site contacts.

Facility personnel were not aware of any environmental ground investigations or monitoring having taken place on the site; however, Ramboll observed two borehole covers in the basement.

No invasive species were reported to be present on-site by the site contacts.

2.9 Potential for Ground Contamination from Current Uses

2.9.1 Potential On-site Contamination Sources

The site is currently occupied by Newcastle Place and Paddington Green Police Station, which has been in this location since the 1970s. Ramboll understands that the site is served by at least two oil tanks located within the basement and on the ground floor, neither of which were accessible at the time of the inspection. The site is also served by at least one generator and a number of lift motor rooms. Site personnel reported that all on-site plant is currently out of use. A moderate to strong hydrocarbon odour was observed by Ramboll in the east of the basement car park; Ramboll was unable to determine the source of the odour. Asbestos containing materials are known to be present throughout the on-site buildings.

2.9.2 Potential Off-site Contamination Sources

The site is located within a predominantly commercial and residential area including the WEG development to the north and Edgware Road to the east. No significant potential offsite contamination sources were identified during the site inspection.

3. HISTORICAL AND REGULATORY INFORMATION

3.1 Map History

Ramboll has undertaken a review of historical mapping and aerial imagery (where available) obtained from a proprietary environmental database which is summarised in this section. Selected historical maps are presented in Appendix 2.

3.1.1 Site

From at least the late 1860s the entire site was occupied by multiple connected buildings of likely residential and commercial use. The site was still occupied by multiple buildings by the mid-1910s, albeit in a different configuration, and one of the buildings in the south-east of the site was labelled as a Metropolitan Theatre of Varieties. Historical building plans dated 1942 showed that other occupied buildings included showrooms in the west of the site, a timber store in the centre of the site, a smithy, wood working workshop, slaughterhouse and garage (likely for vehicle maintenance) in the north of the site, and the Metropolitan Music Hall in the east. Part of a garage was present in the north of the site, extending off-site to the north. As part of the garage a sunk petrol tank is labelled within the northern site boundary, which is later labelled as 'disused' in the historical building drawing dated 1963.

Historical building drawings dated 1960 showed the timber store, smithy, wood working workshop and slaughterhouse were no longer present, and a car park was present in the north and centre of the site. At this date the centre and eastern portions of the site had been cleared of buildings, and historical building plans dated 1967 showed the site had been cleared and was being used as a coach park.

By the early 1970s a building had been developed on the site (approximately 30% of the total site area) labelled as Police Station and Section House (the current site configuration). Historical building drawings dated 1970 show the configuration of the police station at this time, which included a car wash area towards the north and a plant room in the eastern part of the basement containing 'oil fuel heaters'. Aerial imagery published in 1999 showed the north of the site was occupied by external hardstanding used for car parking. No further significant changes were identified up to and including Google Maps aerial imagery dated 2022.

3.1.2 Study Area

From at least the late 1860s the site has been located in a heavily built up area of Central London comprising a mixture of residential, commercial and light industrial uses. Maps dated 1915 showed that a tramway was located 10m south of the site, a garage was present 70 m north-west, a disused crane yard was labelled 130 m north-west, Paddington Station was 380 m south-west and Marylebone Station was 640 m north-east.

By the mid-1940s the tramway was no longer present, and historical building drawings dated 1942 show that a wood working workshop, garage and sawmill was present partially on-site and extending off-site to the north. The drawings show a sunk petrol tank (within the site boundary) forming part of the garage. Historical building plans dated 1970 show oil storage and paint spraying activities were also undertaken at the garage.

By the mid-1980s, light industrial sites within the surrounding area included a factory and works from 40m north-west, warehouses from 80 m south and garages from 200 m west, 240 m south-west, 260 m south-west and 280 m south. Land from 40m north (previously occupied by warehouses) was cleared by the early 2000s and Google Earth™ imagery from 2010 showed the garage to the north of the site was in the process of being demolished. The building was no longer

present by 2011 and the land was used for storage and parking of vehicles. Imagery from 2017 showed the former garage building and land to the north were occupied by a construction site, and by 2020 a high-rise building was under development. Google Maps imagery from 2022 show the high-rise building (WEG Block A) to be complete, with the reminder of the land to the north of the site still under construction as part of the West End Gate (WEG) development. Blocks A-F of WEG are now fully completed and occupied.

No further significant changes were identified up to and including aerial imagery dated 2022.

3.2 A recent ecology site visit undertaken in May 2022 confirmed that parts of the site was used for construction material storage.Environmental Database Records

The information presented in Table 3.1 has been obtained from a review of an up-to-date proprietary environmental database² (dated 2022) of the site and surrounding study area.

Table 3.1: Summary of Key Environmental Database Information					
Data Type	On site	Within 250 m	Within 500 m	Within 1 km	Details of nearest relevant record within 250 m of site
Contaminated Land Register entries	0	0	0	0	None
Prosecutions or enforcement actions	0	0	0	0	None
Pollution incidents	0	1	0	6	Record relates to oils (unknown) 240 m S of the site causing a Category 3 (minor incident), dated 6/09/1996.
Former landfill sites	0	0	0	0	None
Current landfill sites	0	0	0	0	None
Registered Waste Sites	0	4	1	0	Nearest (surrendered) license held by WCC 140 m SW, prohibited waste includes clinical, special wastes and waste N.O.S. Nearest (operational) licence held by Onyx UK Ltd 150 m SW, prohibited waste includes clinical, special wastes and waste N.O.S.
Part A(1) Environmental Permits	0	0	0	0	None
Part A(2) Environmental Permits	0	0	0	0	None
Part B Environmental Permits	1	1	6	13	On-site: operated by Godfrey Davis London Limited for respraying of road vehicles. Application status is 'not yet authorised'; however, the permit is dated September 1992. Dry cleaning 180 m N operated by Brite dated September 2007. Application permitted.

² The Regulatory Agency in Scotland, The Scottish Environmental Protection Agency (SEPA) does not currently provide information to third-party database providers. Therefore information obtained through the environmental database may be out of date. Up to date information can only be obtained by requesting it directly from SEPA; which involves a statutory response time of 6 weeks. Enquiries to the regulator are not included in the scope of this work.

Table 3.1: Summary of Key Environmental Database Information					
Data Type	On site	Within 250 m	Within 500 m	Within 1 km	Details of nearest relevant record within 250 m of site
Control of Major Accident Hazards Sites (COMAH)	0	0	0	0	None
Fuel Stations	0	0	2	4	None
Contemporary trade directory entries	2	57	142	369	On-site: both records are inactive. Nearest active record is El Tayar Cargo Ltd 40 m NE for electrical goods sales, manufacturers and wholesalers. Others active within 250 m include decorating supplies, car body repairs, Chemists' & Pharmacists', fabricated metal products, Leather Garments & Products, Commercial Cleaning Services and toy manufacturers.
Registered Radioactive Substances	0	0	24	4	Information on certain radioactive substance authorisations is not publicly accessible
EA discharge consents	0	0	2	18	None
Radon affected area	N	N/A	N/A	N/A	N/A

According to the environmental database, the site does not lie in a 'Radon Affected Area' as defined by Public Health England. The site is recorded as being located in an area where less than 1 % of residential properties are projected to contain radon above the residential action threshold.

Under Health and Safety legislation, employers have a duty to manage workplace risks including the potential for radon exposure. Health and Safety Executive guidance recommends radon monitoring for workplaces located in radon affected areas. If the workplace radon threshold is exceeded, the Ionising Radiations Regulations 1999³ require employers to take action to reduce risks.

According to BRE Report BR211 (2015)⁴, radon protection measures are not required under building regulations for new buildings at this location.

The LinesearchbeforeUdig (LSBUD) database, which lists pipelines distributing crude oil and refined hydrocarbon products owned and/or operated by a number of UK pipeline operators indicates that there is one record of underground oil or refined hydrocarbon product pipelines on the site or within 250 m held by Fulcrum Pipelines. The LSBUD database indicates that there are also records of assets held by Energy Assets Networks (gas), ESP Utilities Group (gas), Cadent Gas (gas), EU Networks Fiber UK Ltd. (fibre), EXA Infrastructure (fibre), Neos Networks (fibre), UK Power Networks (electricity), National Grid Electricity Transmission (electricity), Zayo Group UK Ltd (fibre) and Scottish and Southern Electricity Networks (electricity).

Transport for London's Property Asset identifies the south-east of the site as lying within the zone of influence for the London Underground (Bakerloo Line).

³ Regulations relating to the basic safety standards for the protection of the general public and workers against the dangers of ionising radiation, dated 1999.

⁴ BRE, Radon: Guidance on Protective Measures for New Buildings, dated 2015.

3.3 Regulatory Authority Enquiries

3.3.1 Local Authority Environmental Health Department

The Environmental Health Department of WCC has provided the following information (response dated September 2022):

- In Westminster, there are no Special Sites registered under the Environmental Protection Act 1990 78R-T, and none where notices have been served under Part IIA Section 78. As yet, the Council has not produced a schedule of land that will require further assessment under Part IIA of the Environmental Protection Act 1990. Currently the Council's contaminated land inspection strategy is at the site prioritisation stage and they currently have no timescales on this.
- There are no known ground contamination issues associated with the site. It should be noted as per the historic maps, the site has had a number of uses including engineering use, warehouse and Police station.
- The Council have no record of landfills within a 250 m radius of the site.
- The Council have no record of elevated indoor radon gas concentrations within buildings on site or within a 100 m radius of the site.
- There are three known private water supplies in Westminster and none of them are within 2 km of the site.

3.3.2 Local Authority Planning Department

Ramboll has obtained a planning history of the site from the Planning Department of WCC. Relevant applications are summarised as follows (as set out in ES Chapter 1(R): Introduction):

- 21/02193/FULL: Demolition and redevelopment of the site to provide three buildings, providing private and affordable residential units (Class C3), commercial uses (Class E), flexible community/affordable workspace (Class E/F.1), provision of private and public amenity space, landscaping, tree and other planting, public realm improvements throughout the site including new pedestrian and cycle links, provision of public art and play space, basement level excavation to provide associated plant, servicing and disabled car and cycle parking, connecting through to the basement of the neighbouring West End Gate development.
- 20/05827/EIASCO: 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.
- Ref. 20/02567/FULL: Use of the annex part of the site as an office (Class E). Application approved 11 December 2020.
- Ref. 20/02103/CLEUD: Mixed use comprising police station (*Sui Generis*), office (Class B1), residential institution (Class C2). Application withdrawn 07 September 2020. No further documents provided.

3.3.3 Petroleum Enforcement Authority

The Petroleum Enforcement Authority of London Fire Brigade have confirmed that they hold no record of petroleum storage tanks on the site (response dated October 2020). Ramboll consider this response to remain valid given the Applicant confirmed status/condition of the site.

3.4 Historical Potential for Ground Contamination

3.4.1 Site

Historically, the site was occupied by multiple units with the potential to cause contamination including part of a garage with a sunk petrol tank, a timber store, smithy, wood working workshop, slaughterhouse, garage and theatre, before the site was cleared and used as a coach park in the late 1960s. The Police Station on the site was developed in the early 1970s. WCC has stated that there are currently no contaminated land sites in the jurisdiction; however, potential contamination arising from historical site uses cannot be discounted. The WCC planning portal does not hold records of environmental investigations being undertaken at the site.

3.4.2 Study Area

The immediate surrounds have historically included potentially contaminative light industrial uses including garages, workshops, warehouses, factories and a sawmill. A tramway was historically within 10 m of the site to the south, and historical building plans from the mid-1950s to 1970 show a garage (partially on-site) extended off-site to the north undertaking oil storage and paint spraying facilities.

4. ENVIRONMENTAL SETTING

Desk-based research of the local geology, hydrogeology and hydrology was carried out in order to establish the potential for migration of contamination onto or away from the site, and to assess the sensitivity and vulnerability of the site’s setting with respect to surface water, groundwater and ecological resources.

Information was obtained from the following sources:

- Published geological maps produced by the British Geological Survey (BGS) and associated sheet memoirs (where available);
- Publicly available BGS borehole logs for the site or within 10 m of the boundary
- A proprietary environmental database procured by Ramboll; and
- Regulatory Authority websites including the Environment Agency (EA).

4.1 Geology and Hydrogeology

According to BGS 1:50,000 mapping of the area and available BGS borehole logs, the site geology and hydrogeology is presented in Table 4.1.

Table 4.1: Summary of Geology and Hydrogeology				
Formation	Description	Thickness	EA Aquifer Designation	Hydrogeological Significance
Made Ground is anticipated on-site (consistent with a nearby borehole log described below).				
Langley Silt Member	Clay and Silt	Up to 5 m thick	Unproductive Strata	Low permeability formations with negligible significance for water supply.
London Clay Formation	Clay, silt and sand	Up to 150 m thick	Unproductive Strata	Low permeability formations with negligible significance for water supply.
Lambeth Group	Clay, silt, sand, gravel, minor limestones and lignites with occasional sandstone	Up to 39 m thick	Secondary A Aquifer	Permeable formations with potential to support localised abstractions.
Upper Chalk Formation	Chalk	Up to 60 m thick	Principal Aquifer	Highly permeable, with significant water storage. Able to support large abstractions.

The BGS hold records of two boreholes drilled approximately 10 m south of the site in July 1963 relating to road improvements. The following ground conditions were encountered:

- 0.15 m of concrete underlain by rubble and soft clay to 0.4 m below ground level (bgl);
- Stiff brown sandy clay with fine and medium gravel to 1.0 mbgl;
- Stiff brown sandy clay to 3.2 mbgl;
- Medium dense clayey fine to medium sand with occasional pockets of firm brown sandy clay to 6.8 mbgl;
- Dense fine to medium gravel and brown medium sand to 8.8 mbgl;
- Stiff brown clay to 9.1 mbgl; and
- Stiff fissured dark grey silty clay to 15.2 mbgl (end of borehole).

No groundwater was reportedly encountered during drilling.

Historic⁵ and recent⁶ ground investigations undertaken at the adjacent WEG development indicate the following ground stratigraphy at the site:

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

Note that Lynch Hill Gravels were found and may also be present on the site.

The EA does not currently classify a groundwater body being present at the site under the Water Framework Directive (WFD) classification scheme. This is likely due to the fact that the geological conditions typically prevent the storage or transport of groundwater (i.e., due to the presence of the Langley Silt Member and London Clay Formation).

According to EA information provided by a commercial environmental regulatory database provider, there are 56 licensed groundwater abstractions within a 2 km radius of the site. Of these, 13 are within 1 km, as detailed in Table 4.2. There are no abstractions for public potable water supply within 2 km.

Table 4.2: Licensed Groundwater Abstractions within 1 km of Site			
Licence Holder	Distance from Site	Abstraction source	Purpose of Abstraction
Derwent Valley London Limited	340 m W	Not specified	Other Industrial/Commercial/Public Services: Heat Pump.
Land Securities Properties Limited	580 m SW	Not specified	Commercial/Industrial/Public Services: Drinking; Cooking; Sanitary; Washing (Small Garden).
CSHV IUK ET Propco Limited	590 m SW	Not specified	Other Industrial/Commercial/Public Services: Heat Pump.
CSHV IUK ET Propco Limited	600 m SW	Not specified	Commercial/Industrial/Public Services: Drinking; Cooking; Sanitary; Washing (Small Garden).
Britel Fund Trustees Limited	600 m SW	Not specified	Other Industrial/Commercial/Public Services: Non-Evaporative Cooling.
Britel Fund Trustees Limited	640 m SW	Not specified	Other Industrial/Commercial/Public Services: Non-Evaporative Cooling.
Accor UK Business & Leisure Hotels Limited	730 m W	Not specified	Hotels, Public Houses and Conference Centres: Heat Pump.
Dorset House Residential Limited	820 m E	Not specified	Household Water Supply: Drinking; Cooking; Sanitary; Washing (Small Garden).
Abbey National Plc	860 m E	Not specified	Commercial/Industrial/Public Services: Drinking; Cooking; Sanitary; Washing (Small Garden.)

⁵ Soil Mechanics 1995

⁶ LEAP Environmental 2015

Table 4.2: Licensed Groundwater Abstractions within 1 km of Site			
Licence Holder	Distance from Site	Abstraction source	Purpose of Abstraction
Baskerville Estates (GP) Limited	900 m E	Not Specified	Commercial/Industrial/Public Services: Drinking; Cooking; Sanitary; Washing (Small Garden).
Abbey Lodge Rtm Company Limited	930 m NE	Not specified	Household Water Supply: Drinking; Cooking; Sanitary; Washing (Small Garden).
Santander (Cf Trustee) Limited	970 m SE	Not specified	Other Industrial/Commercial/Public Services: Heat Pump.
Abbey National (Cf Trustee) Ltd.	970 m SE	Not specified	Production of Energy: Mechanical Non Electrical: Heat Pump

The site is not situated within an EA designated groundwater Source Protection Zone.

4.2 Coal Mining

According to the Coal Authority, the site is not located in a Coal Mining Affected Area. The BGS has stated that the site is located in an area where other (non-coal) mining activities are “No Hazard”.

4.3 Hydrology

The nearest identified surface water body is the Paddington Basin approximately 150 m south, connecting to the Grand Union Canal and Regents Canal at the junction of Little Venice 750 m north-west of the site. The EA has not classified these watercourses under the Water Framework Directive classification scheme.

According to mapping in the publication The Lost Rivers of London (Barton, 1992), the former route of the River Tyburn passed 760 m to the east of the site. This former watercourse is anticipated to be culverted in the vicinity of its former route.

According to an independent, third party environmental database, there are two licensed surface water abstractions within a 2 km radius of the site, as detailed in Table 4.3.

Table 4.3: Licensed Surface Water Abstractions within 2 km of Site.			
Licence Holder	Distance from Site	Abstraction source	Purpose of Abstraction
British Waterways	590 m N	River	Industrial Cooling
Canal and River Trust	660 m N	Regents Canal	Amenity: Spray Irrigation - Direct

According to the EA fluvial and tidal flood map for planning, the site is located in Flood Zone 1 (Low Probability). This zone comprises land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1 % in any year).

It should be noted that flood zones in England do not take into account the presence of flood defences.

According to the EA Flood Map for Surface Water which presents the theoretical potential for flooding from pluvial sources (i.e. flooding caused by rainwater exceeding capacity of drainage systems), the majority of the site is located in an area of Very Low flooding probability. This zone

comprises land assessed as having a less than 1 in 1,000 annual probability of pluvial flooding (<0.1% in any year).

There are areas in the eastern corner, part of the A404 immediately south and Newcastle Place immediately north which are shown to be at Low and Medium surface water flood risk. However, the modelling used to determine these areas of surface water flood risk does not take detailed account of existing drainage assets nor of those which would be installed as part of the 2022 amended proposed development. The mapping is also based on pre-development topography.

4.4 Designated Ecological Sites

There are no statutory designated ecologically sensitive sites located within 1 km of the site. St John’s Wood Church Grounds Local Nature Reserve (LNR) is located approximately 1.1 km north-east of the site.

St Mary’s Churchyard and Paddington Green Park Square Gardens Borough Grade II Site of Importance for Nature Conservation (SINC) is located immediately to the west of the site. A Replacement Ecology Impact Assessment has been prepared for the 2022 amended proposed development.

The site does not lie within areas of Adopted / Unadopted Green Belt or a Nitrate Vulnerable Zone (NVZ).

4.5 Environmental Sensitivity and Vulnerability

The site is located within a low sensitivity setting with regard to groundwater resources. The site overlies an Unproductive Strata, is not located within a Groundwater Source Protection Zone and there are no groundwater abstractions for public potable water supply located within 2 km.

The site is located in a low sensitivity location with regard to surface water resources, as the Paddington Basin is situated approximately 150 m south of the site. There are two licensed surface water abstractions within 2 km.

There are no statutory designated ecologically sensitive areas within 1 km; however, St John’s Wood Church Grounds LNR is located approximately 1.1 km north-east of the site.

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

The western half of Newcastle Place is within the Paddington Green Conservation Area. A Heritage Statement, as well as a Townscape, Visual and Built Heritage Impact Assessment accompanies the application.

5. CONCEPTUAL SITE MODEL

5.1 Introduction

In the UK ground contamination is assessed by identifying whether a pollutant linkage is present (or potentially present) between a contaminant, a pathway and a receptor in the form of a Conceptual Site Model (CSM). The CSM takes into account the known information from the site, surroundings and the environmental setting and is a simplified representation of the possible environmental conditions at and in the vicinity of the site, and is used to initially identify potential sources, potentially sensitive receptors, pathways, and pollutant linkages.

The information provided in the preliminary CSM is based on the findings of the Phase 1 assessment of this report.

5.2 Potential Sources of Contamination

The potential sources of contamination identified from the desk study are summarised in Table 5.1.

Table 5.1: Potential Sources of Contamination		
Period	On-site	Off-site
Current	Made Ground on-site. This may include demolition materials, asbestos, and unknown contaminants from previous uses.	Made Ground used in construction of current buildings.
	Two above ground oil storage tanks located in the basement and ground floor. Condition of the tanks is unknown. No spills or leaks reported.	
	A moderate to strong hydrocarbon odour was noted by Ramboll in the east of the basement car park during the site walkover undertaken in 2020. Ramboll was unable to determine the source of the odour.	
	Asbestos containing materials are known to be present throughout the on-site buildings.	
Historic	Use as a timber store, smithy, wood working workshop, slaughterhouse and garage from the early 1940s until the late 1960s.	A tramway <10 m south and a garage 10 m north including a sunk petrol tank, oil storage and paint spraying facilities.

5.3 Receptors

The identified receptors are summarised in Table 5.2.

Table 5.2: Potential Receptors to Contamination			
Receptor	Location	Rationale	Receptor Present
Humans	On-Site	The site is currently occupied by disused police station buildings with a basement level car park. At the time of Ramboll’s site inspection, part of the basement was temporarily being used for material storage and vehicle parking associated with the adjacent WEG development. Future redevelopment is proposed to comprise approximately 556 homes; approximately 1,326 m² GEA flexible commercial space; and connection to the WEG basement . Receptors include elevated residential site users, commercial site users and construction workers.	Yes
	Off-Site	The site is located within a mixed commercial/residential setting.	Yes
Water Environment	On-Site	The underlying superficial deposits and natural bedrock are both classified as Unproductive Strata. Shallow groundwater underlying the site is not anticipated. Lynch Hill Gravels may be present, although not likely to be a viable potable water resource.	No
	Off-Site	Surface Water: the Paddington Basin is located 150 m south of the site. No sensitive surface water abstractions are located within 2 km of the site. Given the local geology and distance to surface water a significant risk of pollution from ground contamination is not anticipated.	No
Ecological Receptors	On-Site	There are no statutorily designated ecological receptors identified on-site.	No
	Off-Site	There are no statutorily designated ecological receptors identified within 1km of the site.	No
Built Environment	On-Site	The site is proposed to be re-developed in future for a residential-led scheme with residential units.	Yes

5.4 Potential Pathways

The identified potential pathways for contamination are summarised in Table 5.3.

Table 5.3: Potential Pathways for Contamination		
Pathway	Discussion	Pathway present
Direct Physical Contact, Ingestion and Inhalation	Direct contact with, ingestion, and dust and particulate inhalation pathways are considered unlikely for future site users, as extensive hardstanding and building cover across most of the future development break the pathway from these contaminants to site users. Future site users would be considered receptors to these pathways in exposed soft landscaped areas only. There is a potential pathway between contamination in soil and construction workers.	Yes, once site developed - in soft ground level landscaping areas only. Yes
Contaminant volatilisation into indoor and outdoor airspace	There is a potential pathway from volatile contaminant migration/soil gas migration to indoor and outdoor air.	Yes
Migration from soils to groundwater via leaching	Shallow groundwater is not expected beneath the site due to the underlying Unproductive Strata.	No
Migration within groundwater vertically and laterally to deeper groundwater, and to surface watercourses	The site is underlain by a Unproductive Strata and shallow groundwater is not expected beneath the site. Migration of potential contaminants (if present) is not anticipated.	No
Migration of volatile contaminants via service lines	There is a potential pathway through permeable gravels used to surround service lines.	Yes
Volatilisation of contaminants from groundwater to human receptors	Shallow groundwater is not anticipated to be present beneath the site.	No
Migration of potentially hazardous ground gases	There is a potential for ground gas ingress from the site into future commercial and residential buildings.	Yes

5.5 Preliminary Conceptual Site Model

The potential contaminant sources, pathways and receptors have been combined into potential pollutant linkages (PL) that are detailed in the CSM in Tables 5.4 and 5.5. A Pollutant Linkage is where there is a full connection between a contaminant, pathway and receptor.

Table 5.4: Conceptual Site Model - Potential Completed Development Pollutant Linkages			
Receptor Type	Location	Description of Pollutant Linkage	Pollutant Linkage
Humans	On-site	Dermal contact, inhalation and ingestion of contaminated soils by residential and commercial site users in ground level landscaped areas.	PL1
	On-site	Contaminant volatilisation into indoor and outdoor airspaces and inhalation by residential and commercial site users.	PL2

Table 5.4: Conceptual Site Model - Potential Completed Development Pollutant Linkages			
Receptor Type	Location	Description of Pollutant Linkage	Pollutant Linkage
Built Environment	On-Site	Migration of potentially hazardous ground gases into on-site buildings.	PL3

Table 5.5: Conceptual Site Model - Potential Demolition and Construction Pollutant Linkages			
Receptor Type	Location	Description of Pollutant Linkage	Pollutant Linkage
Humans	On-site	Dermal contact, inhalation and ingestion of contaminated soils by construction workers.	PL1
	On-site	Contaminant volatilisation and dust into indoor and outdoor airspaces and inhalation by construction workers.	PL2
Built Environment	On-Site	Migration of potentially hazardous ground gases into on-site buildings.	PL3

6. CONCLUSIONS

The site is currently occupied by Paddington Green Police Station, which has been present in this location since the 1970s, as well as Newcastle Place. The former police station was vacant at the time of the inspection undertaken in 2020. The Applicant has confirmed that site conditions remain unchanged and accordingly the site visit undertaken in September 2020 is considered to remain valid.

Approximately 30 % of the site is currently occupied by building cover, the remainder of the site is occupied by concrete and asphalt hardstanding comprising a car parking/courtyard area. A basement underlies the Police Station Building. Newcastle Place is present in the north of the site, providing both pedestrian and vehicular access between Paddington Green to the west and Edgware Road to the east of the site.

According to a site inspection undertaken by Ramboll in 2020, the site is served by at least two oil tanks located within the basement and on the ground floor, neither of which were accessible at the time of the inspection. The site is also served by at least one generator and a number of lift motor rooms. Site personnel reported that all on-site plant is currently out of use. A moderate to strong hydrocarbon odour was observed by Ramboll in the east of the basement car park; Ramboll was unable to determine the source of the odour. Asbestos containing materials are known to be present throughout the on-site buildings.

The site was historically occupied by multiple units with the potential to cause contamination including part of a garage with a sunk petrol tank, a timber store, smithy, wood working workshop, slaughterhouse, garage and theatre, before the site was cleared and used as a coach park in the late 1960s. The current Police Station was developed in the early 1970s. Potential historic ground contaminants could include oils and fuels, asbestos fibres, metals, volatile organic compounds and other hydrocarbon compounds. Made Ground/fill of unknown composition is likely to be present at the site from the construction of the current site buildings.

The study area has historically included potentially contaminative light industrial uses including garages, workshops, warehouses, factories and a sawmill. A tramway was historically within 10 m of the site to the south, and historical building plans from the mid-1950s to 1970 show a garage (partially on-site) extended off-site to the north undertaking oil storage and paint spraying facilities. WCC has stated that in the City of Westminster there are currently no contaminated land sites or 'Special Sites' as they are known under the Environmental Protection Act 1990 within their jurisdiction, and the Environmental Health Department has stated that there are no known ground contamination issues associated with the site.

The site is located within a low sensitivity location with regard to groundwater resources. Both the superficial deposits and natural bedrock underlying the site and immediate surrounding area are classified as Unproductive Strata, and the site is not located within a Groundwater Source Protection Zone. There are no groundwater abstractions for public potable water supply within 2 km of the site.

The site is located within a low sensitivity location with regard to surface water resources. The nearest surface watercourse is the Paddington Basin approximately 150 m south, connecting to the Grand Union Canal and Regents Canal at the junction of Little Venice 750 m north-west of the site.

There are no statutory designated ecologically sensitive sites located within 1 km of the site. Potential pollutant linkages associated with the history of the site include risks to human health from dermal contact, inhalation and ingestion of contaminated soils and risks from vapours or ground gases migrating into new buildings. Future building cover and clean soils in landscaping would mitigate some potential pollutant linkages (i.e. providing a barrier to the soil). As is standard

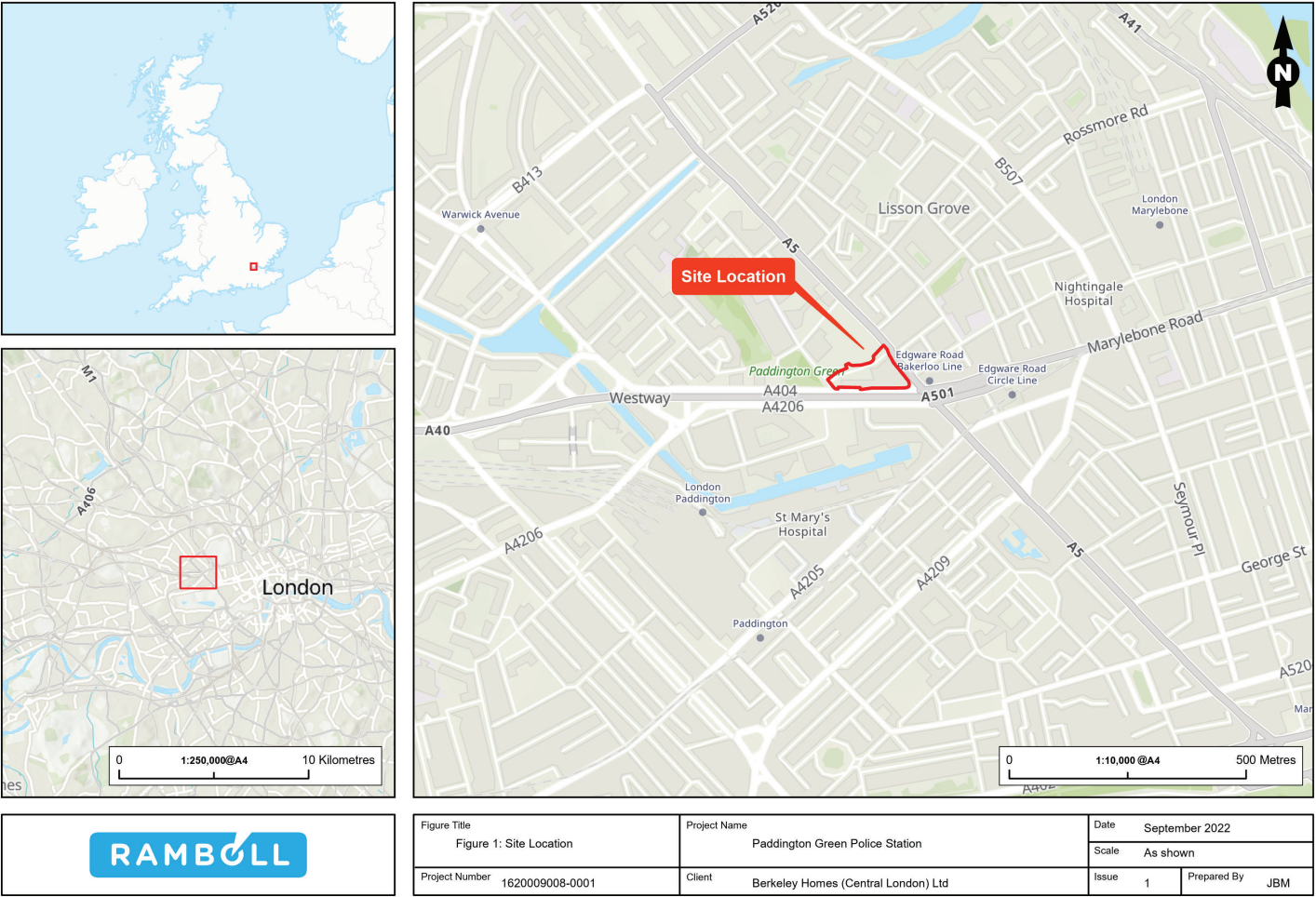
for a brownfield site redevelopment, potential risks would be assessed through a site investigation and risk assessment.

The investigation and risk assessment would be undertaken at an appropriate point before redevelopment work starts on-site. Remediation works cannot be completely ruled out until the investigation and risk assessment have been undertaken; however, given that the basement excavation would remove potentially contaminated soil, the requirement for extensive remediation is considered unlikely.

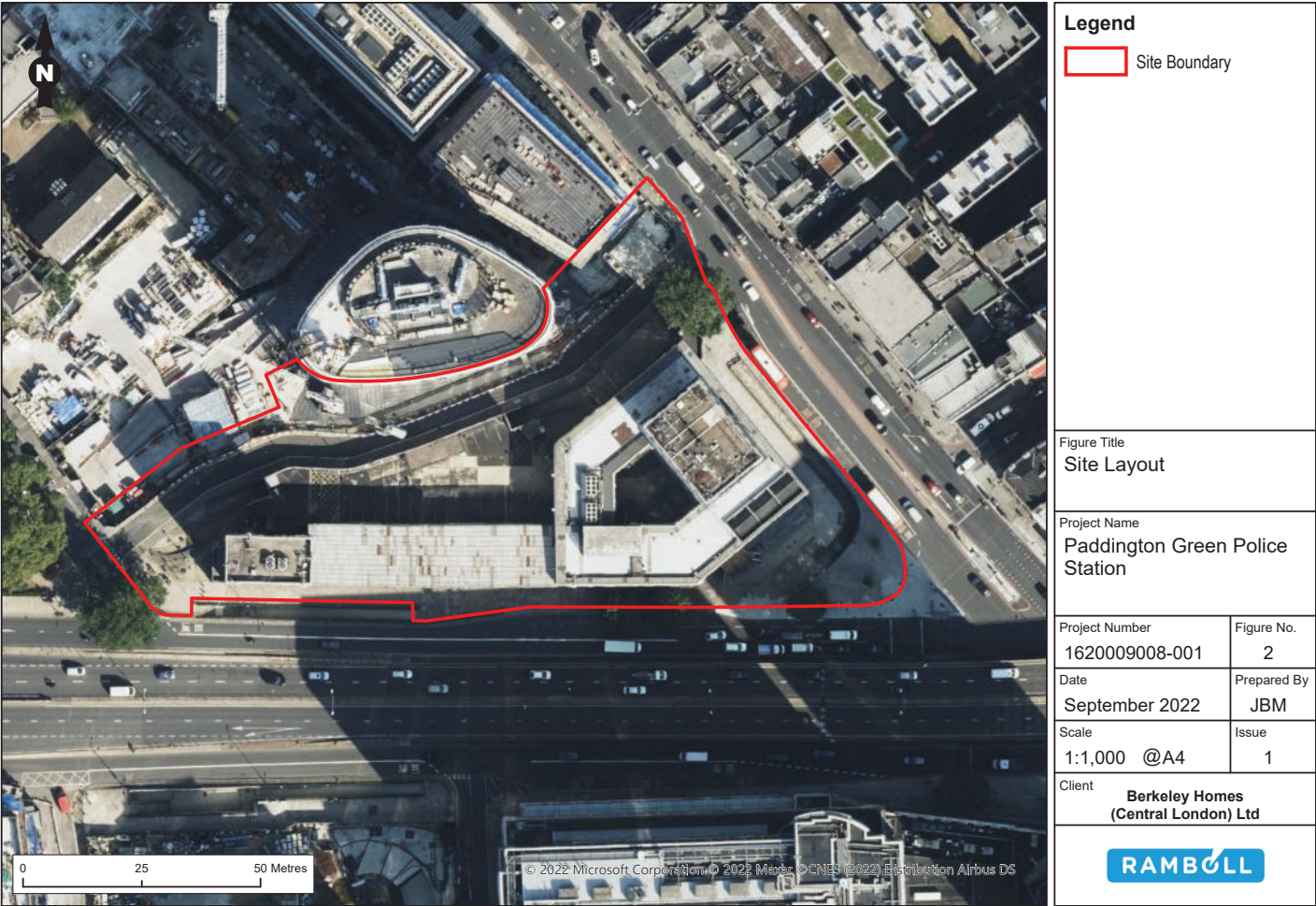
Development works would also consider the potential for contamination to be present and how this is managed. For example, this could include health and safety of workers, piling risk assessment, Sustainable Drainage System (SuDS) assessment, appropriate classification of contaminated soils and potential for asbestos and other contaminants to be present. Hazardous materials in buildings, such as oil tanks and asbestos, would also be considered and measures taken to prevent pollution during demolition and construction.

On the basis of the above, significant adverse environmental effects are considered unlikely. Site Investigation Works and associated remediation and validation works (if necessary) would be secured by means of an appropriately worded planning condition.

APPENDIX 1
FIGURES



APPENDIX 2
SELECTED HISTORICAL MAPS



Ordnance Survey County Series and
Ordnance Survey Plan 1:2,500

Quarry

Gravel Pit

Sand Pit

Clay Pit

Shingle

Refuse Heap

Sloping Masonry

Flat Rock

Marsh

Reeds

Osiers

Rough Pasture

Furze

Wood

Mixed Wood

Brushwood

Orchard

Fir

Ford

Stepping Stones

Ferry

Waterfall

Lock

Trig. Station

Altitude at Trig. Station

Bench Mark

Surface Level

Arrow denotes flow of water

Antiquities (site of)

Cutting

Embankment

Railway crossing

Road crossing

Railway crossing River or Canal

Road over single stream

Road over River or Canal

County Boundary (Geographical)

County & Civil Parish Boundary

Administrative County & Civil Parish Boundary

County Borough Boundary (England)

County Borough Boundary (Scotland)

Police Cell Box

Pump

Signal Post

Sluice

Spring

Telephone Call Box

Trough

Well

Wind Pump

Ordnance Survey Plan, Additional SIMs and
Supply of Unpublished Survey Information
1:2,500 and 1:1,250

Inactive Quarry, Chalk Pit or Clay Pit

Active Quarry, Chalk Pit or Clay Pit

Rock

Boulders

Cliff

Slopes

Roofed Building

Glazed Roof Building

Sloping Masonry

Archway

Non-Coniferous Tree (surveyed)

Coniferous Tree (surveyed)

Non-Coniferous Trees (not surveyed)

Coniferous Trees (not surveyed)

Orchard Tree

Scrub

Bracken

Coppice, Osier

Reeds

Marsh, Saltings

Rough Grassland

Heath

Culvert

Direction of water flow

Bench Mark

Antiquity (site of)

Electricity Transmission Line

Electricity Pylon

Cave Entrance

Triangulation Station

Electricity Pylon

Roofed Building

Glazed Roof Building

Civil parish/community boundary

District boundary

County boundary

Boundary post/stone

Boundary marking symbol (note: these always appear in opposed pairs or groups of three)

Bike

Barracks

Battery

Cemtery

Chimney

Public Convenience

Cistern

Pumping Station

Disarmed Railway

Place of Worship

Electricity Generating Station

Sewage Ppg Sta

Electricity Pole, Pillar

Signal Box or Bridge

Electricity Sub Station

Signal Post or Light

Filter Bed

Spring

Fountain / Drinking Ftn.

Tank or Track

Gas Gov.

Gas Valve Compound

Gas Governor

Trough

Guide Post

Wind Pump

W.P.L.W.T.

Water Point, Water Tap

Manhole

Works (building or area)

Well

Mile Post or Mile Stone

Large-Scale National Grid Data 1:2,500 and
1:1,250

Cliff

Rock

Boulders

Positioned Boulder

Scree

Non-Coniferous Tree (surveyed)

Coniferous Tree (surveyed)

Non-Coniferous Trees (not surveyed)

Coniferous Trees (not surveyed)

Orchard Tree

Scrub

Bracken

Coppice, Osier

Reeds

Marsh, Saltings

Rough Grassland

Heath

Culvert

Direction of water flow

Triangulation Station

Antiquity (site of)

Electricity Transmission Line

Electricity Pylon

Bench Mark

Buildings with Building Seed

Roofed Building

Glazed Roof Building

Civil parish/community boundary

District boundary

County boundary

Boundary post/stone

Boundary marking symbol (note: these always appear in opposed pairs or groups of three)

Bike

Barracks

Battery

Cemtery

Chimney

Public Convenience

Cistern

Pumping Station

Disarmed Railway

Place of Worship

Electricity Generating Station

Sewage Ppg Sta

Electricity Pole, Pillar

Signal Box or Bridge

Electricity Sub Station

Signal Post or Light

Filter Bed

Spring

Fountain / Drinking Ftn.

Tank or Track

Gas Gov.

Gas Valve Compound

Gas Governor

Trough

Guide Post

Wind Pump

W.P.L.W.T.

Water Point, Water Tap

Manhole

Works (building or area)

Well

Mile Post or Mile Stone

Historical Mapping & Photography included:

Mapping Type	Scale	Date	Pg
London	1:2,500	1889 - 1890	2
London	1:2,500	1895	3
London	1:2,500	1915 - 1916	4
London	1:2,500	1936	5
Historical Aerial Photography	1:1,250	1946 - 1949	6
Ordnance Survey Plan	1:1,250	1953 - 1954	7
Additional SIMs	1:1,250	1953 - 1957	8
Ordnance Survey Plan	1:2,500	1954 - 1956	9
Additional SIMs	1:2,500	1955	10
Ordnance Survey Plan	1:1,250	1962 - 1975	11
Ordnance Survey Plan	1:1,250	1969 - 1974	12
Supply of Unpublished Survey Information	1:1,250	1973	13
Additional SIMs	1:1,250	1986 - 1990	14
Ordnance Survey Plan	1:1,250	1987	15
Large-Scale National Grid Data	1:1,250	1991	16
Large-Scale National Grid Data	1:1,250	1992 - 1993	17
Large-Scale National Grid Data	1:1,250	1994	18
Large-Scale National Grid Data	1:1,250	1996	19
Historical Aerial Photography	1:2,500	1999	20

Historical Map - Segment A13

Order Details

Order Number: 258300880_1_1

Customer Ref: 1620009008

National Grid Reference: 526930, 181750

Site: A

Site Area (Ha): 0.83

Search Buffer (m): 100

Site Details

Metropolitan Police, Paddington Green Police Station, 4, Harrow Road, LONDON, W2 1XJ

Landmark

Tel: 0844 844 9952

Fax: 0844 844 9951

Web: www.enscheck.co.uk

A Landmark Information Group Service v50.0 22-Sep-2020 Page 1 of 20

London

Published 1869 - 1880

Source map scale - 1:2,500

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas and by 1890 it covered the whole of what were considered to be the cultivated parts of Great Britain. The published date given below is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas.

Map Name(s) and Date(s)

024 00

1885

1:2,500

033 00

1889

1:2,500

Historical Map - Segment A13

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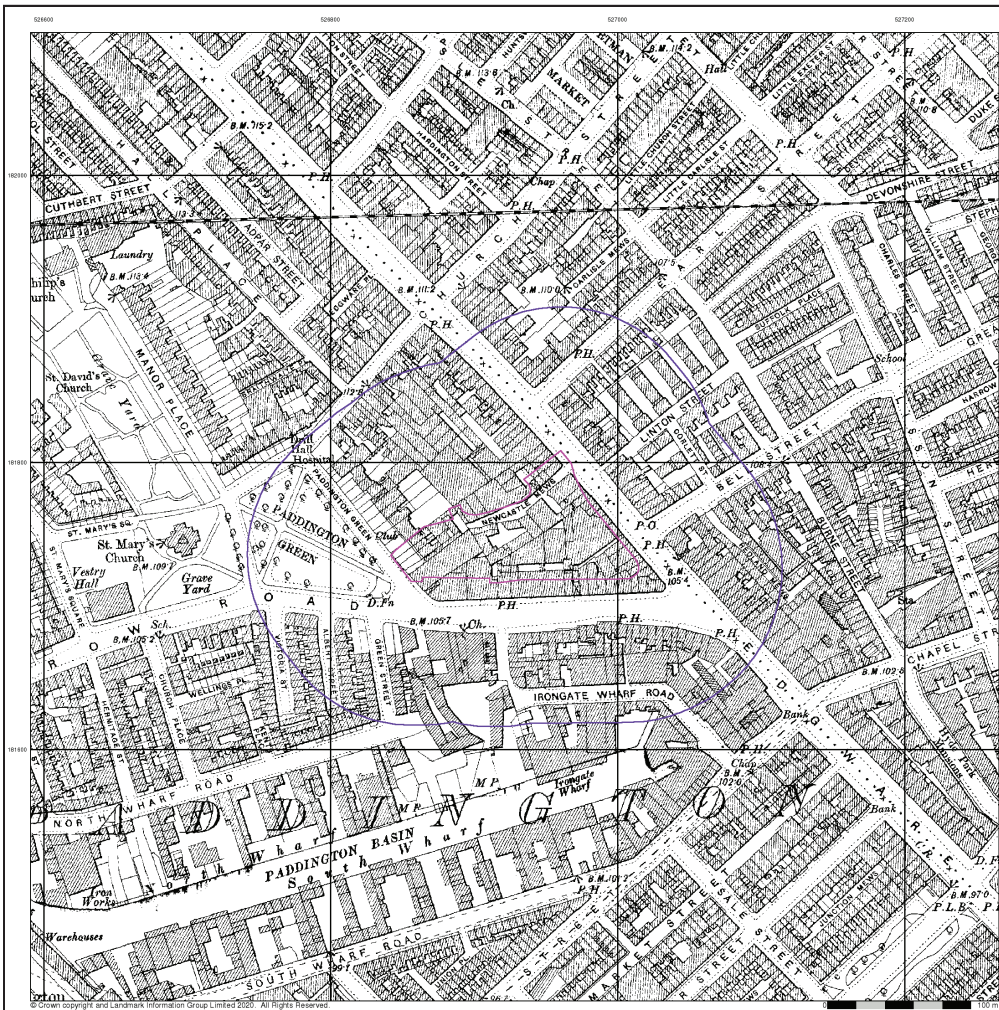
Landmark

Tel: 0844 844 9952

Fax: 0844 844 9951

Web: www.enscheck.co.uk

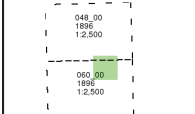
A Landmark Information Group Service v50.0 22-Sep-2020 Page 2 of 20



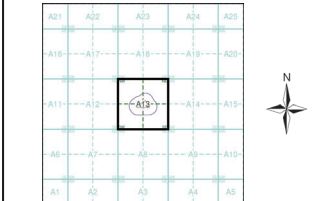
London
Published 1896
Source map scale - 1:2,500

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas and by 1896 it covered the whole of what were considered to be the cultivated parts of Great Britain. The published date given below is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas.

Map Name(s) and Date(s)



Historical Map - Segment A13



Order Details

Order Number: 258300880_1_1
Customer Ref: 1620009008
National Grid Reference: 526930, 181750
Slice: A
Site Area (Ha): 0.83
Search Buffer (m): 100

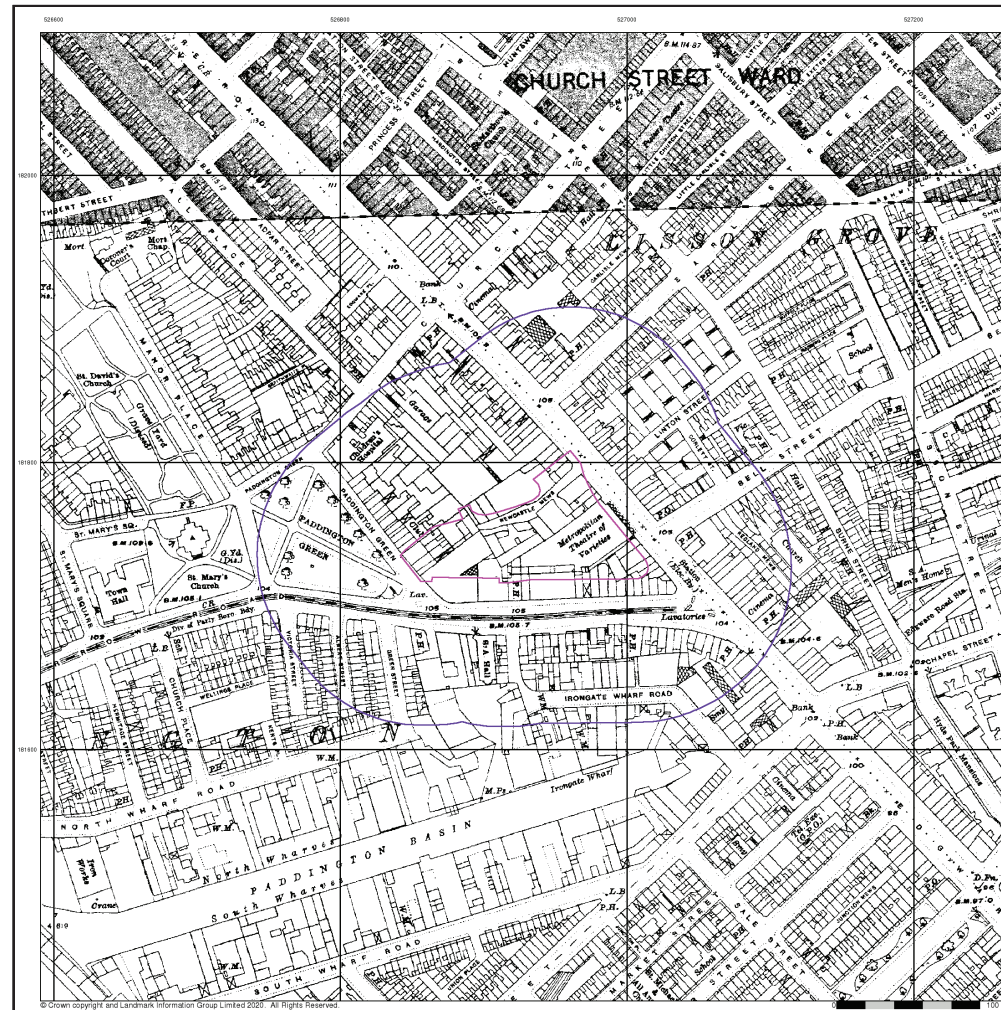
Site Details

Metropolitan Police, Paddington Green Police Station, 4, Harrow Road, LONDON, W2 1XJ



Tel: 0844 844 9952
Fax: 0844 844 9951
Web: www.enrichcheck.co.uk

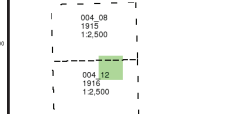
A Landmark Information Group Service v50.0 22-Sep-2020 Page 3 of 20



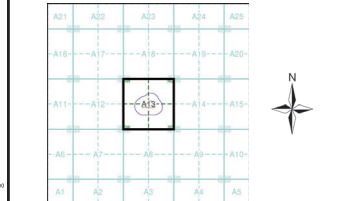
London
Published 1915 - 1916
Source map scale - 1:2,500

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas and by 1896 it covered the whole of what were considered to be the cultivated parts of Great Britain. The published date given below is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas.

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