



**PADDINGTON GREEN**  
POLICE STATION

# Replacement Non Technical Summary

Replacement Non Technical Summary  
November 2022 - GLA0711

NOVEMBER 2022

On behalf of  
**Berkeley Homes (Central London) Limited**

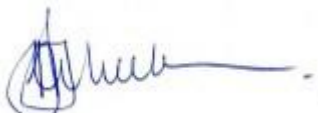
Date  
**November 2022**

Project Number  
**1620009008-001**

**PADDINGTON GREEN  
POLICE STATION  
ENVIRONMENTAL  
STATEMENT  
REPLACEMENT NON-  
TECHNICAL SUMMARY**

# PADDINGTON GREEN POLICE STATION REPLACEMENT NON-TECHNICAL SUMMARY

Project No. **1620009008-001**  
Issue No. **Final**  
Date **07/11/2022**  
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## Version Control Log

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# 1. INTRODUCTION

## 1.1 Background

A full planning application (the 'application') was submitted by Berkeley Homes (Central London) Limited (the 'Applicant') on 1 April 2021 for the residential-led redevelopment (the '2021 proposed development') of a site at 2-4 Harrow Road, Paddington, W2 1XJ (the 'site') within the administrative boundary of the Westminster City Council (WCC) under application reference 21/02193/FULL.

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

- Non-Technical Summary;
- Volume 1: Environmental Statement Main Report;
- Volume 2: Townscape, Visual and Built Heritage Impact Assessment (TVBHIA); and
- Volume 3: 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')<sup>1</sup>.

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 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 2021 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 2021 proposed development would result in a significant loss of daylight and sunlight to existing residential properties.

The application was subsequently referred to the Mayor of London for 'Stage 2' review. Following a review of the application and the proposed decision of WCC, the Mayor of London considered that the 2021 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 Mayor of London directed that he would act as the local planning authority for the purpose of determining the application.

The Mayor of London'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.

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<sup>1</sup> Secretary of State, 2017. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, London, HMSO.

The Applicant is now proposing to make amendments and refinements to the 2021 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;
- 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 m<sup>2</sup> to 4,755 m<sup>2</sup>;
- Reduction in external communal amenity space provision from 835 m<sup>2</sup> to 0 m<sup>2</sup>;
- Increase in play space provision from 1,138 m<sup>2</sup> to 1,150 m<sup>2</sup>;
- 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.

The outcomes of the updated assessments are reported in a Replacement ES, hereafter referred to as the '2022 Replacement ES'. Accordingly, the reader should disregard the 2021 ES.

The 2022 Replacement ES comprises the following documents:

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

This document comprises the Replacement Non-Technical Summary (NTS).

## **1.2 Purpose of Replacement Non-Technical Summary**

This is the Replacement NTS of the 2022 Replacement ES which has been prepared by Ramboll UK Limited (Ramboll) and a team of technical specialists in accordance with the statutory procedures set out in the Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (the 'EIA Regulations').

The Replacement ES has been prepared to accompany the planning application for full planning permission by the Applicant to the GLA in respect of the 2022 amended proposed development.

The Replacement NTS presents a summary of the main findings of the environmental impact assessment (EIA) that has been undertaken of the 2022 amended proposed development and that has been reported in the 2022 Replacement ES. The Replacement NTS provides:

- a description of the site and surrounding context;
- an outline of the reasonable development alternatives considered by the Applicant and an indication of the main reasons for their choice, taking into account the potential environmental impacts;
- a description of the 2022 amended proposed development; and
- a summary of the likely significant environmental effects predicted and key mitigation measures (as relevant).

The aim of the Replacement NTS is to summarise the main findings of the Replacement ES in a clear and concise manner to assist the public in understanding what the significant environmental effects of the 2022 amended proposed development are likely to be. Reference can be made to the full Replacement ES if further detail is required.

## **1.3 Viewing of Replacement ES and Application**

The 2022 Replacement ES comprises the following:

- Replacement Non-Technical Summary (this document);
- Volume 1(R): Replacement Main Environmental Statement;
- Volume 2(R): Replacement Townscape, Visual and Built Heritage Impact Assessment; and
- Volume 3(R): Technical Appendices.

The complete 2022 Replacement ES documents will be available for viewing at:

Greater London Authority  
London City Hall  
Kamal Chunchie Way  
London  
E16 1ZE



## 2. ENVIRONMENTAL IMPACT ASSESSMENT

### 2.1 EIA Process and Methodology

EIA is a process that identifies the likely significant environmental effects (both beneficial and adverse) of a proposed development. The process aims to prevent and, where prevention is not possible, to reduce and/or mitigate any significant adverse environmental effects, where these are identified, and to enhance any beneficial effects. It is an iterative process which proactively seeks to integrate mitigation within the development proposals so as to avoid significant effects from arising.

The EIA process adopted for the 2022 amended proposed development has followed best practice guidelines, as set out by the Institute of Environmental Management and Assessment (IEMA) Quality Mark scheme. The process involved the following key steps:

- Consultation with key stakeholders such as the GLA, WCC, Transport for London (TfL), Historic England, Thames Water and the Environment Agency (EA) on the issues to be considered within the EIA;
- Collection, use and assessment of the most up-to-date baseline information and likely evolution of that baseline without the 2022 amended proposed development or in the future;
- Interpretation of the 2022 amended proposed development planning drawings and schedules, as well as the formulation of assumptions in the absence of information, as the basis for the individual technical assessments;
- Use of relevant guidance and good practice methods to predict the likely nature, scale and significance of any environmental change; and
- Reporting of the results of the EIA process in the 2022 Replacement ES in a transparent way, to provide the information required to inform the decision-making process.

### 2.2 EIA Scoping

#### 2.2.1 Pre-Submission Consultation

An EIA Scoping Opinion Request Report 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 Opinion Request Report set out a description of the then emerging proposed development; the potential key environmental impacts and likely effects to be considered as part of the EIA; the proposed technical assessment chapters; as well as the proposed assessment methodologies.

WCC adopted their EIA Scoping Opinion on 25 March 2021 confirming the scope of the EIA and ES as proposed in the EIA Scoping Opinion Request Report, with no requests for additional technical assessment chapters to be included in the ES. The EIA was undertaken and the 2021 ES prepared based on the EIA Scoping Opinion.

#### 2.2.2 Post-Submission Consultation

Following submission of the planning application in March 2021, the 2021 ES was reviewed by Avison Young on behalf of WCC. Following consultation between Avison Young and the Applicant's consultant team, it was agreed that there were no material omissions from the 2021 ES and no further information was requested by WCC in accordance with Regulation 25 of the EIA Regulations.

Following the 'call in' by the GLA, the Applicant has consulted regularly with the GLA and presented to the London Review Panel. The responses and feedback received primarily related to the design of the 2021 proposed development and to the emerging proposed amendments.

No comments were received in respect of the scope of the EIA or methodologies adopted in the technical assessments, with the exception of the Townscape, Visual and Built Heritage Impact Assessment, for which an assessment of additional viewpoints and heritage assets was requested.

Due to the similar scale and nature of the 2021 proposed development and the 2022 amended proposed development, the scope and methodology agreed for the EIA and ES in March 2021 are considered to remain valid, especially in respect of building height with the scheme considered in the EIA Scoping Process, proposed at up to 39 storeys.

In light of the above, the updated EIA has been undertaken and the 2022 Replacement ES prepared based on the EIA Scoping Opinion issued on 25 March 2021.

### **2.3 Topics Included in EIA**

The following topics were scoped into the updated EIA as technical assessment chapters:

- Socio-Economics;
- Air Quality;
- Noise and Vibration;
- Wind Microclimate;
- Daylight, Sunlight, Overshadowing and Solar Glare; and
- Townscape, Visual and Built Heritage.

### **2.4 Topics Excluded from the EIA**

The following topics were scoped out of the updated EIA as technical assessment chapters:

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

However, these topics have informed the iterative design process and the formulation of embedded mitigation. Technical assessment reports that were prepared during the course of this process are presented as technical appendices to the Replacement ES.

In respect of air quality and noise and vibration, completed development effects on surrounding receptors were scoped out of the technical assessments on account of the 'car-free' nature of the 2021 proposed development and associated insignificant levels of predicted development traffic flows. However, for the 2022 amended proposed development, consideration has been given to the amended proposals in respect of Newcastle Place and a focussed road traffic assessment has therefore been undertaken of the amended traffic flows in this location for completeness.

## 2.5 Assessment Approach

The 2022 Replacement ES provides assessments of potential significant environmental effects during demolition and construction and once the 2022 amended proposed development is complete and operational. Each technical assessment considers different types of effects including direct, indirect, secondary and cumulative; short-, medium- and long-term; temporary and permanent; beneficial, neutral and adverse effects.

Each of the above scoped-in environmental topics have been addressed in a separate technical assessment chapter in ES Volumes 1(R) and 2(R). In each chapter, a description of the assessment methodology is given together with the existing site conditions. Where relevant, defined future site conditions are also considered. This is followed by an assessment of the likely effects of the 2022 amended proposed development taking into account mitigation measures that are embedded in the development proposals; the consideration of the need for additional mitigation or any recommendations for enhancement measures to reduce or offset any significant adverse effects identified during the assessment; and a concluding assessment on the residual effects that would remain after these measures have been implemented.

The technical assessment chapters report upon the likely scale (Negligible, Minor, Moderate or Major), nature (beneficial, neutral and adverse) and significance of environmental effects, informed by published assessment guidance.

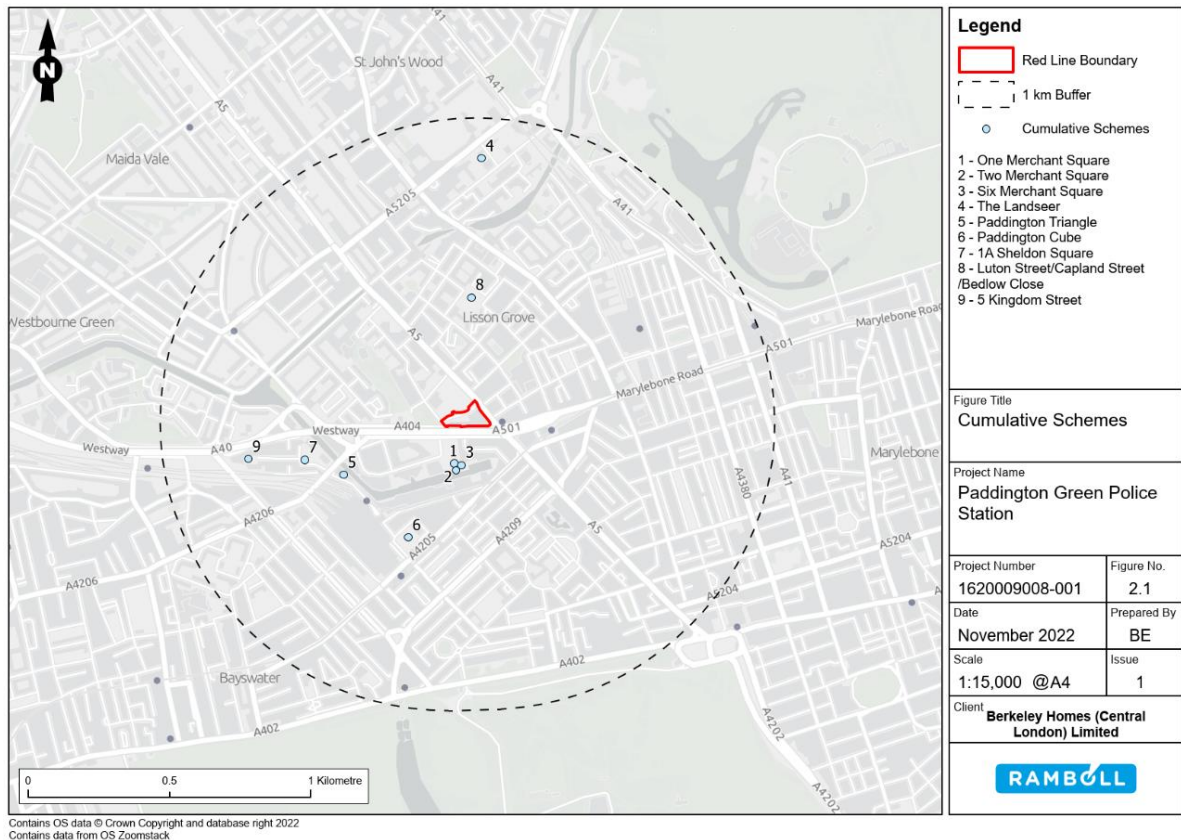
Consideration is also given to the cumulative effects of the 2022 amended proposed development. The following two types of cumulative effects have been assessed:

- Intra-Project effects are different types of impacts from the 2022 amended proposed development that could interact to jointly affect a particular receptor or receptor group at the site. Potential impact interactions could include the combined effects of noise and dust during demolition and construction activities on a particular sensitive receptor; and
- Inter-Project effects which are combined or additional effects generated from the 2022 amended proposed development together with other 'existing or approved projects' ('cumulative schemes') as defined by the EIA Regulations. These cumulative schemes may generate their own individually insignificant effects but when considered together could amount to a significant cumulative effect, for example, combined transport and accessibility impacts from two or more schemes. Additive effects were considered for townscape, visual and built heritage.

Spatial considerations and scale of development criteria was developed to identify cumulative schemes that would have the potential for cumulative effects when combined with the proposed development's effects. A list of cumulative schemes was presented to WCC as part of the EIA Scoping Opinion Request Report in 2021. Following the EIA Scoping Process the agreed list was maintained and updated to account for the status of each scheme and any new potential, qualifying schemes. The following approach was adopted:

- Those schemes which have been completed and form part of the baseline were removed from the cumulative schemes list; and
- Emerging and recently consented schemes were considered.

A list of nine cumulative schemes were identified for assessment during this process. The locations of these cumulative schemes are presented in Figure 2.1.



**Figure 2.1: Location of Cumulative Schemes**

In addition, consideration was also given to the following two schemes to the immediate north of the site:

- West End Gate (WEG) development (16/12162/FULL), now completed and occupied; and
- 14-17 Paddington Green (14-17 PG) development (18/08004/FULL and associated Listed Building Consent 18/080110/LBC)<sup>2</sup>, which forms an overlap to/extension of the WEG development, and is due to be completed and occupied by Q2 2026.

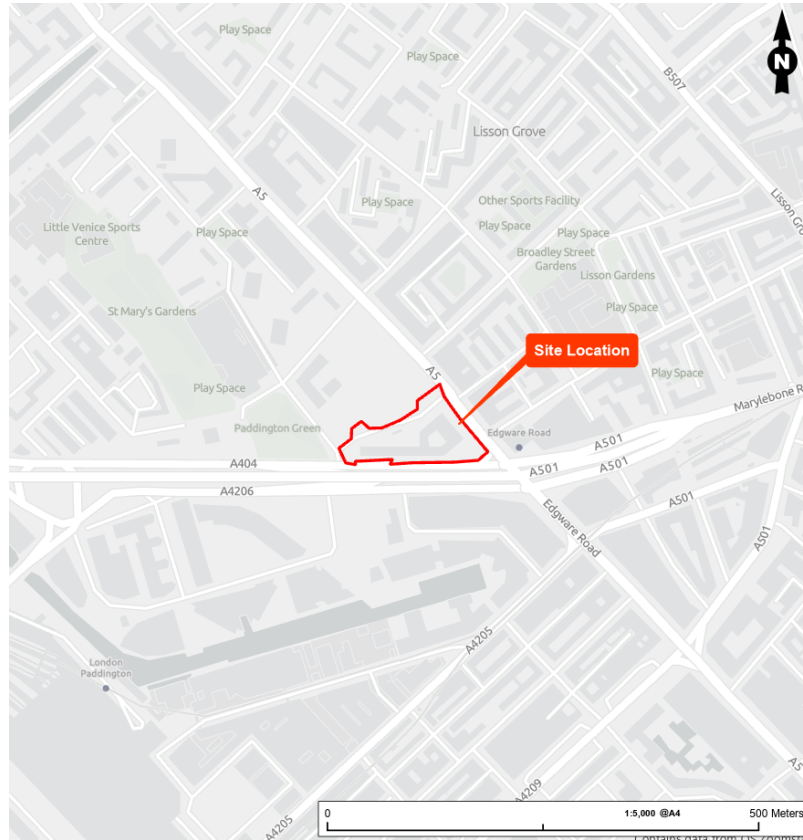
Both of these schemes fall under the control of the Applicant and therefore their development programmes have been used to inform the defined existing and future baselines scenarios.

<sup>2</sup> A S73 Application (22/03790/FULL) was submitted in June 2022 to introduce Senior Living units. This does not affect the nature or scale of the 14-17 PG scheme.

### 3. EXISTING SITE AND SURROUNDING CONTEXT

#### 3.1 Site Location

The site is located at 2-4 Harrow Road, Paddington, London, W2 1XJ (centred at National Grid Reference: TQ 26945 81743), as presented in Figure 3.1.



**Figure 3.1: Site Location Plan**

#### 3.2 Site Description

The site is bounded by:

- West End Gate (WEG) development 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 PG development to the north-west.

The site covers an area of approximately 0.83 hectares (ha).

The site is principally occupied by the vacant 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 three storey building below this on the eastern side of the site, and an eight 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
- Thirteen existing trees, four of which are in planters.

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

The site is underlain by a single level basement used for on-site parking, which is accessed via entrance and exit ramps off Newcastle Place.

Several street trees are present on the pavements surrounding the existing building. These include mature London plane *Platanus x hispanica* trees, semi-mature lime *Tilia sp.* trees and young Turkish hazel *Corylus colurna*.

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. The site is currently vacant, with part of the basement temporarily used for material storage and vehicle parking associated with the adjacent WEG development.

Representative photographs of the site taken in 2021 are shown in Figure 3.2. These photographs are considered to remain materially valid.

### **3.3 Environmental Considerations**

#### **3.3.1 Ground Conditions**

The site is located within a low sensitivity location with regard to groundwater resources. 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.

Historic and recent ground investigations undertaken at the adjacent WEG development indicate the following ground stratigraphy at the site: Rubbly Made Ground (typically 1 m to 2 m thickness); Langley Silt (clays, silts and sands, typically 2 m to 3 m thickness); Lynch Hill Gravels (gravelly sands and flint gravel with uppermost 1 m to 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)).

Beneath these superficial deposits lies the solid bedrock geology, comprising an impermeable layer of silty to very silty clay, which is further underlain by aquifers comprising clay, and fine-grained sand beneath. The chalk present at depth is also classified as an aquifer, which is separated from the shallower strata by the substantial thickness of the low permeability clay.

#### **3.3.2 Water Resources**

There are no surface water features on the site and no main rivers located within a 1 km radius. The closest surface water features are the Grand Union Canal, located approximately 150 m to the south, and the Boating Lake at Regent's Park approximately 1 km to the north-east. 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.

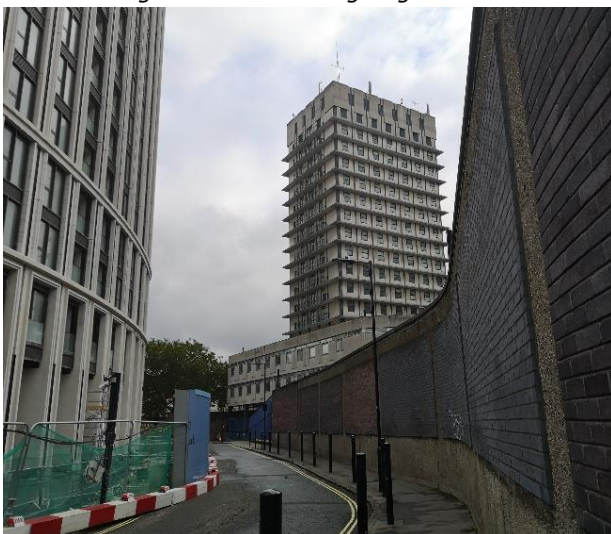
The site is situated within Environment Agency Flood Zone 1 which means there is a 'low' probability of flooding.



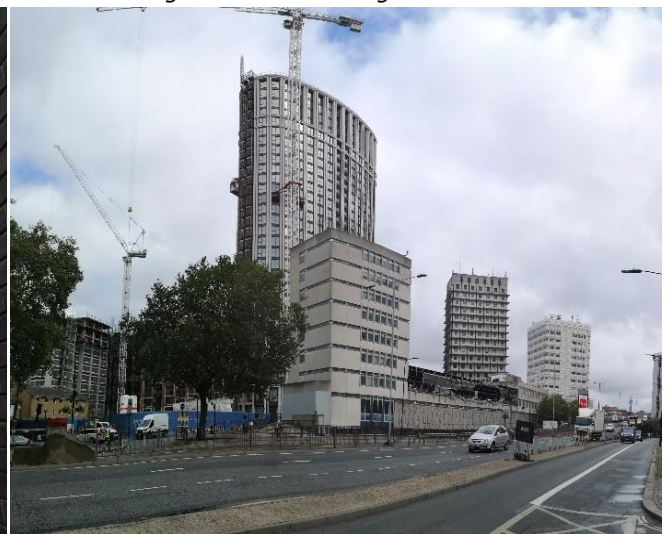
*View Looking North-West along Edgware Road*



*View Looking South-West along Newcastle Place*



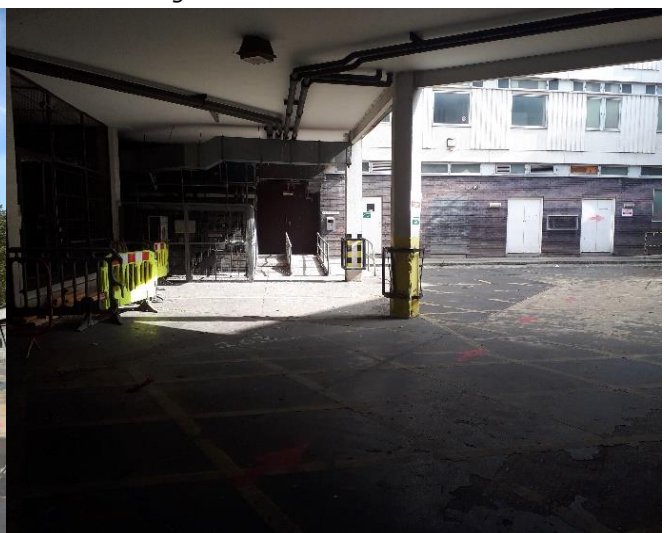
*View Looking South-East along Newcastle Place*



*View Looking North-East A40*



*Surfaced Car Parking Area and Link Block*



*Internal Hardstanding Courtyard*

**Figure 3.2: Site Photographs**

### 3.3.3 Ecology

There are no statutory designated conservation sites within 1 km of the site. There are 21 Sites of Importance to Nature Conservation (SINCs; non-statutory designated conservation sites) within 2

km of the site, the closest being the St Mary's Churchyard and Paddington Green Borough Grade II SINC immediately to the west of the site.

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

#### 3.3.4 Below and Above Ground Heritage

The site is located within the Watling Street Tier II Archaeological Priority Area (APA), designated for being within the vicinity of a Roman road, with potential for remains of the road and roadside activity. The northern and north-western parts of the site is located within the Paddington Tier II APA, designated for its potential to contain remains of the historic settlement of Paddington Green.

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

The Police Station is unlisted. However, the following heritage receptors are located within approximately 500 m of the site:

- Lisson Grove Conservation Area;
- Maida Vale Conservation Area;
- Bayswater Conservation Area;
- St John's Wood Conservation Area;
- Molyneux Street Conservation Area;
- Church of St Mary (Grade II\*);
- Marylebone Lower House North Westminster Community School (Grade II\*);
- The Children's Hospital (Grade II); and
- 17 and 18 Paddington Green (Grade II).

In addition, there are several buildings of merit, as identified in the Paddington Green CA Audit, the Lisson Grove CA Audit and the Bayswater CA Audit within 500 m of the site. The closest Registered Park and Gardens is the Grade I Listed Hyde Park, located approximately 1 km south of the site. Regents Park (which is also a CA) is located approximately 1 km east of the site.

#### 3.3.5 Townscape and Views

The site is not located within one of the designated viewing corridors under the London View Management Framework, although it is visible in the periphery of the view from Primrose Hill, but not in conjunction with the principal landmarks. The site is not located in a locally designated view.

The prevailing townscape character comprises the following:

- To the north-west of the site, the area is dominated by the Hall Place Estate which features a mixture of medium scale residential blocks and tower blocks;
- To the north, north-east and east of the site beyond Edgware Road, the area is densely built up, generally characterised by three to five storey terraces and small post-war blocks with ground floor retail lining Edgware Road;
- To the south of the site, beyond the A40, the area is dominated by Paddington Basin, mainly comprising large scale commercial buildings, generally of recent construction, arranged in relatively coherent groupings; and



- To the west of the site, the area features a mix of smaller scale historic buildings, open space, low rise post-war housing, stuccoed villas, mansion blocks and educational uses (The City of Westminster College). Parts of this area are within the Paddington Green and Maida Vale CAs.

### 3.3.6 Transport and Accessibility

The site is situated in a highly accessible location with a public transport accessibility level (PTAL) rating of 6b. Edgware Road Underground Station is approximately 50 m to the east of the site and Paddington Station approximately 400 m to the south-west of the site. There are also good bus, pedestrian and cycle routes in the vicinity of the site, with the following three London Cycle Network (LCN) routes in the locality of the site:

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

### 3.3.7 Noise and Air Quality

Due to the site's urban location, the main existing noise sources comprise road traffic noise (principally from the A40 fly over and Edgware Road). The site is located within an Air Quality Management Area (AQMA), within the Edgware Road / Marylebone Road Air Quality Focus Area and within the Ultra Low Emission Zone (ULEZ), expanded in 2021.

The entirety of WCC has been declared an AQMA for exceedances in nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>) levels. Existing air quality at the site is impacted from road traffic emissions on the main road network to the east and south of the site.

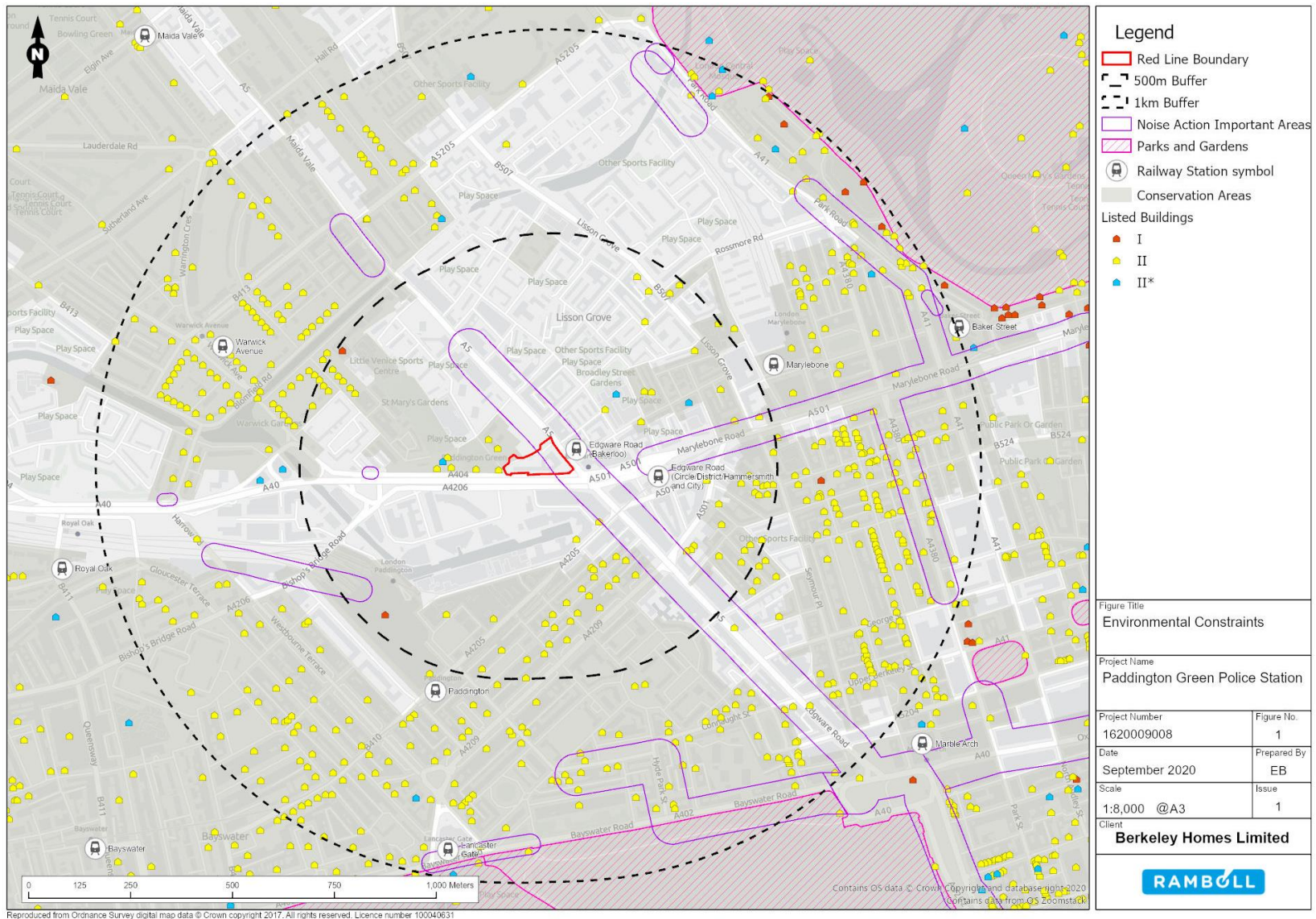
NO<sub>2</sub> concentrations within the study area have been above air quality objectives between 2015 to 2019. Measured PM<sub>10</sub> and PM<sub>2.5</sub> concentrations are below the national objectives but exceed the more stringent 2005 World Health Organisation (WHO) guidelines. There is a downwards trend in NO<sub>2</sub> concentrations over time at roadside monitoring sites.

As concentrations fall-off rapidly on moving away from an emissions source, such as a main road, some variation in pollutants concentrations across the site would be expected. Concentrations at the site are likely to be highest closest to Harrow Road and Edgware Road, reducing gradually as distance from the main road increases. Air quality at background and roadside locations is expected to gradually improve in future years due to the renewal of the vehicle fleet with lower emission factors with Defra expecting background air quality concentrations to decrease 2019 to 2027.

### 3.3.8 Telecommunication Interference

The site is no longer utilised by emergency services, which removes the key sensitive receptor of concern in respect of telecommunication interference. It is expected that due to the nature of building use around the site, there will be a high number of different radio networks and services in use for communications and remote monitoring needs and accordingly potential impacts on telecommunication interference would be minimal. In addition, a pre-and post-construction signal survey would be secured by means of an appropriately worded planning condition if necessary.

Figure 3.3 shows some of the key environmental constraints surrounding the site.



**Figure 3.3: Surrounding Environmental Considerations**

#### **4.4 'Do Nothing' Scenario**

The 'Do Nothing' scenario is a hypothetical alternative conventionally considered in EIA as a basis for comparing the development proposal under consideration. The 'Do-Nothing' scenario, in the sense that the site is left in its current state, is not considered to be a viable or reasonable alternative for the reasons set out below and is therefore not a realistic scenario given the planning history and previous use of the site and its surrounding context:

- The site's long-standing use has ended and the site needs to be, as a matter of principle, re-purposed;
- The site is located within the CAZ, in proximity to the Church Street/Edgware Road Housing Renewal Area, and adjacent to the Edgware Road/Church Street district shopping centre.
- The Applicant secured planning consent for the redevelopment of the WEG site and as part of this process, prepared a wider masterplan vision for 14-17 PG and the site.
- The Applicant subsequently secured planning consent for 14-17 PG and has implemented both the WEG and 14-17 PG schemes.
- The Applicant purchased the site in 2020 with the intention of completing and implementing the wider masterplan vision.

#### **4.5 Alternative Sites**

No alternative sites have been considered by the Applicant for the following reasons:

- The site is owned by the Applicant and therefore the Applicant did not consider alternative sites which are the property of a third party;
- The site is located immediately to the south of the WEG site, which was previously allocated for residential housing in the 2016 Westminster City Plan, prior to its redevelopment. The Applicant has now delivered WEG and is in the process of delivering 14-17 PG, and is committed to the complete delivery of the wider WEG masterplan vision;
- The proposal utilises shared facilities with the WEG development to increase efficiencies;
- The Applicant is seeking to optimise the site's potential in accordance with the NPPF; and
- The site would provide a key development opportunity to contribute to the regeneration of an underutilised site, and to provide greater and more varied housing, retail and leisure opportunities.

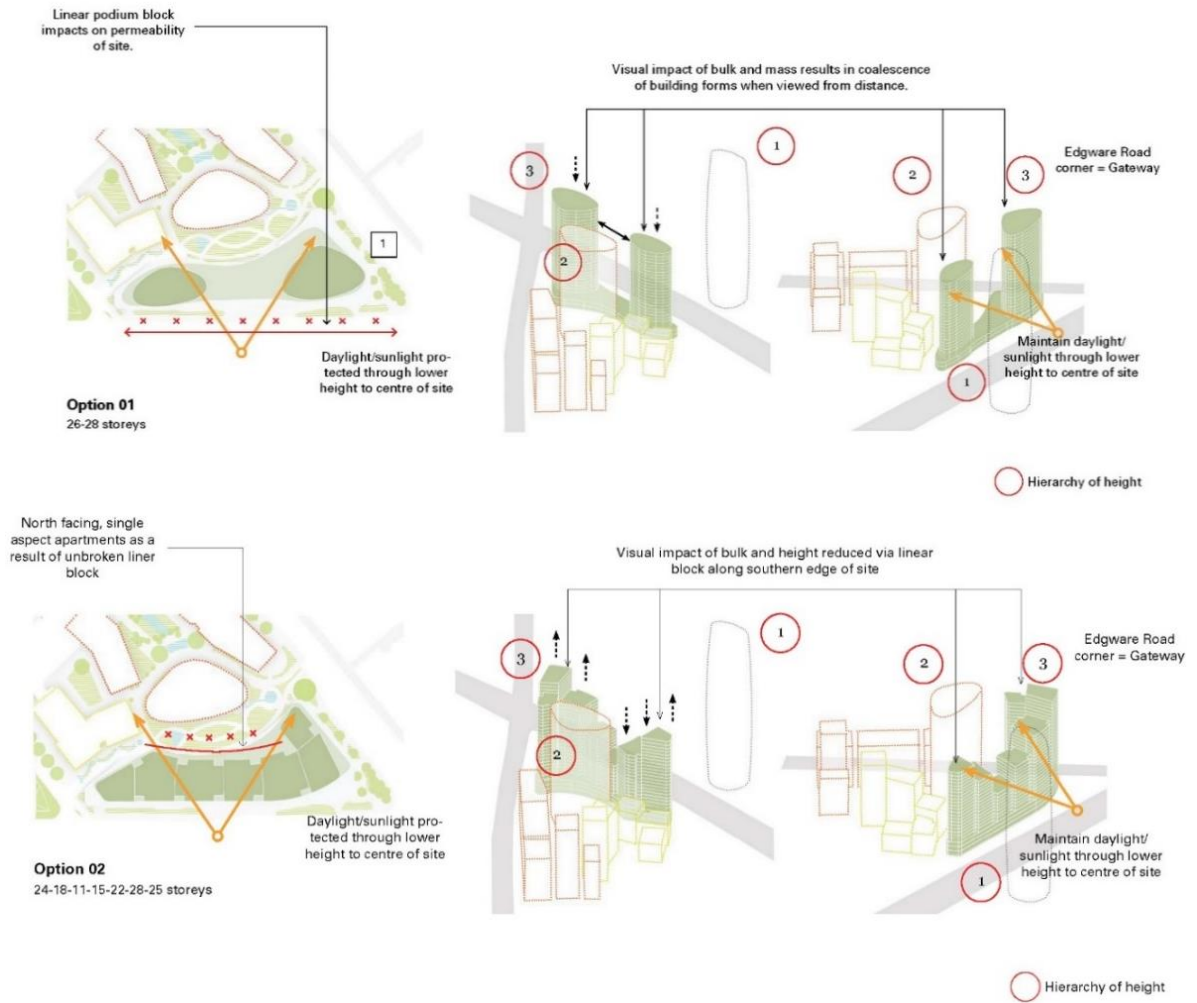
#### **4.6 Alternative Land Uses**

The proposed land uses have been informed by prevailing local and regional policy. No other land uses were considered other than those proposed.

#### **4.7 Alternative Site, Height and Massing Layouts**

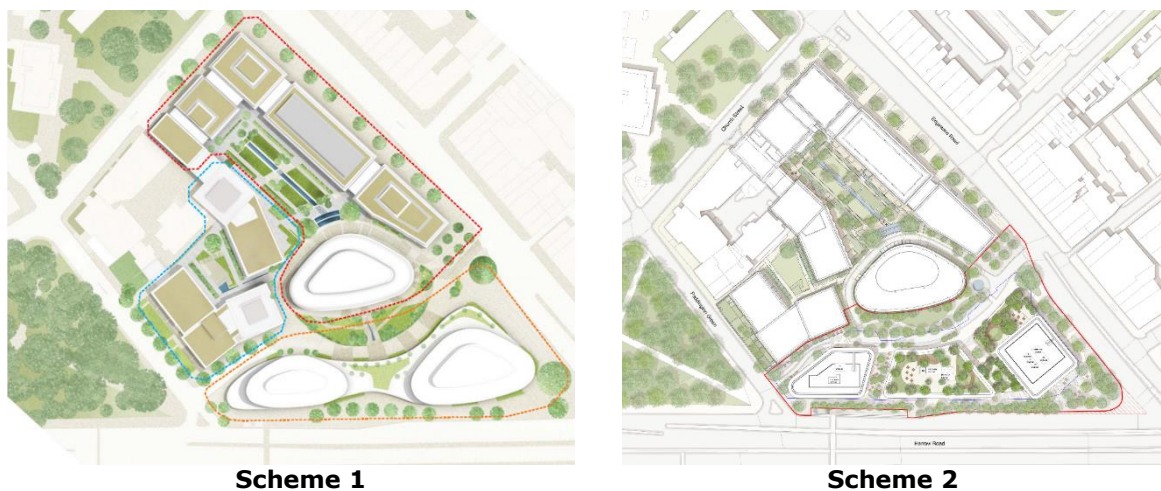
A long and iterative design evolution process was undertaken and included rigorous consultation with WCC (pre-submission) and subsequently (post-submission) the GLA and London Review Panel. The layout options considered daylight, sunlight and overshadowing; heritage; townscape character; visibility; open space provisioning; and residential quality factors within the context of existing and emerging local and regional policy.

As part of the 2021 pre-application submission process, a series of massing concepts were developed during the initial design stages to explore the impact of buildings on the local context and to establish the most suitable spatial arrangement for the 2021 proposed development. Two of these concepts are shown in Figure 5.1.



**Figure 5.1: Early Design Concepts**

Option 1 was selected as the preferred design concept because of the placement of the two tower forms to each corner of the site. This allowed the scheme to be read alongside the existing WEG tower especially when using the same façade articulation to create a grouping of buildings and complete the set. Option 1 was further developed into two schemes as shown in Figure 5.2.

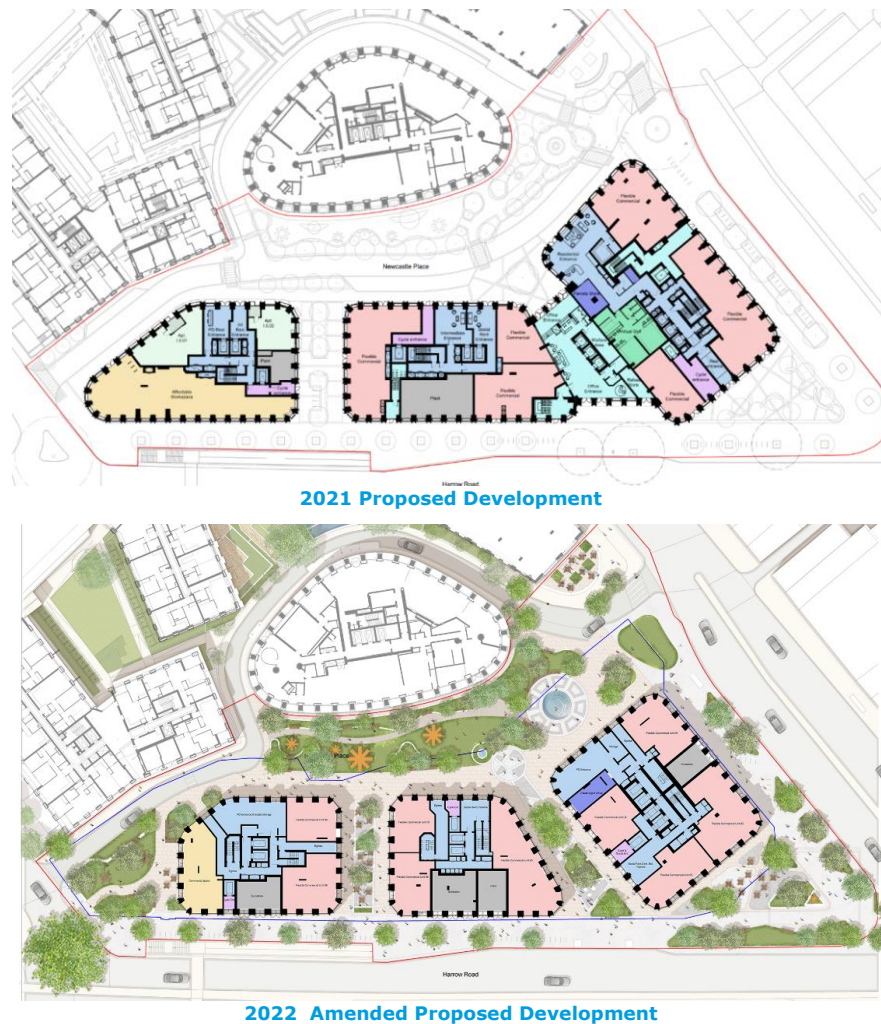


**Figure 5.2: 2021 Pre-Application Submission Scheme 1 and 2 Block Layouts**

Scheme 2 was selected as the preferred option for submission to WCC with refinements made to the layout, building typologies, building height, façade design and landscaping. Refinements were informed by the consultation process and extensive environmental appraisals. Noise, air quality,

wind, views, daylight, sunlight and overshadowing modelling were of particular importance in ensuring the proposed development minimised environmental impacts.

Following submission of the application to WCC in 2021, further refinements to the design were made in consultation with the GLA. The overall layout of the proposals was revised to address the daylight and sunlight impact on neighbouring properties, and the building footprints and positions on the site were revised to introduce smaller footprints and increased gaps between buildings. These changes are illustrated in Figure 5.3 and resulted in substantial improvements to the public realm and quality of homes within the 2022 amended proposed development.



**Figure 5.3: Pre- and Post-Application Submission Development Layout Comparison**

The scheme evolved continuously to capture comments and feedback from pre- and post-application submission meetings with WCC, the GLA, consultation with key stakeholders and the local community and subsequent post-application meetings with the GLA, local community and London Review Panel.

The feedback received from these consultations were considered as appropriate during the design evolution and the formulation of embedded mitigation measures. The design process has been iterative, responding to the numerous opportunities and constraints on-site and in the surrounding area, principally those relating to the site’s surrounding context, building height, townscape, visual amenity and built heritage; air quality; noise and vibration; daylight and sunlight; and wind.

## 5. PROPOSED DEVELOPMENT

### 5.1 2022 Amended Proposed Development Description

The Applicant is submitting a full planning application for the following:

*"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."*

In summary, the 2022 amended proposed development would comprise the following:

- Demolition of the Paddington Green Police Station buildings;
- Excavation of a basement and connection into the WEG development basement;
- Erection of three blocks (I, J, K) along, but set back from, Harrow Road and Edgware Road;
- Delivery of ground floor commercial and community uses and residential at upper floors, with associated landscaped residential gardens; and
- Stopping up of Newcastle Place with associated landscaping and cycle parking.

### 5.2 Site Arrangement

Blocks I, J and K would be constructed across the site, west to east respectively, to provide flexible commercial, community and residential floorspace. The blocks would be arranged along the southern frontage of the site enabling the delivery of a landscaped area to the north between the WEG / 14-17 PG developments and the new buildings.

The main entrance to the site would be from Edgware Road onto Newcastle Place. This entrance would allow delivery and drop off vehicle and pedestrian access to the site. Vehicles associated with servicing would access the basement levels via Church Street and the WEG basement.

The 2022 amended proposed development would be 'car free', excluding disabled, service, delivery and drop off vehicles, and therefore car movement to and from the site would be minimal.

Landscaping, private and public amenity space would be delivered across the 2022 amended proposed development. Newcastle Place would be redesigned to create an expanse of landscaped public realm that would link Paddington Green to Edgware Road.

### 5.3 Land Use Distribution

The land use distribution across the site has been arranged on horizontal and vertical profiles to create distinct residential, flexible commercial, community and residential amenity zones.

Flexible commercial floorspace would be provided at the ground level of Blocks I, J and K creating active frontages.

The 2022 amended proposed development would be underlain by two levels of basement both of which would connect into the basement of the WEG development to the north. Basement Level B1 would be the larger of the two, comprising a full basement level (as existing) and extending to the entire footprint of the site with an additional extension in the north-west to provide the connection to the WEG development. The on-site basement would be accessed off Church Street as per the existing arrangement associated with WEG.

Level B1 would accommodate the following uses:

- 17 accessible car parking spaces;
- 1,012 long stay cycle storage spaces for residential and commercial use (with an additional 104 spaces within the WEG basement);
- Cycle changing facilities for use by the commercial units;
- Residential, commercial and retail refuse stores;
- Surface water attenuation tanks; and
- Mechanical and electrical plant.

The substantially smaller basement Level B2 would accommodate waste management facilities which would integrate with the existing WEG waste management strategy.

At ground level:

- Block I would comprise flexible commercial floorspace, community space, residential entrance and estate storage, egress, plant and a cycle entrance;
- Block J would comprise flexible commercial floorspace, fire service and residential entrance, egress, plant and a cycle entrance;
- Block K would comprise flexible commercial floorspace, an estate management office, a residential entrance, storage, fire service and egress, plant, and cycle and goods entrances.

Above ground level:

- Block I would provide residential units from level one upward. This block would have a single central core and typical floor levels would have seven apartments per floorplate.
- Block J would provide residential units from level one upward. This block would have a single central core and typical floor levels would have six apartments per floorplate.
- Block K would provide residential units from level one upwards. This block would have a single central core and typical floor levels would have 11 apartments per floorplate from floor two upwards. Floor one would contain internal residential amenity space.

Roof levels would comprise of servicing and plant equipment, photo voltaic (PV) panels, and biodiverse green roof areas around the perimeter of each roof.

Figures 6.1-6.6 provide a selection of the general arrangement plans.

#### 5.4 Floorspace Schedule

The floorspace schedule for the 2022 amended proposed development is presented in Table 6.1.

<b>Table 6.1: 2022 Amended Proposed Development Area Schedule</b>		
<b>Use Class</b>	<b>Gross Internal Area (GIA) m<sup>2</sup></b>	<b>Gross External Area (GEA) m<sup>2</sup></b>
Residential (Use Class C3) – 556 units including Ancillary Residential Amenity*	45,350	69,725
Flexible Commercial (Use Class E)	1,079	1,215
Community	133	150
<b>Total*</b>	<b>46,562</b>	<b>71,087</b>
*Excludes core/circulation and basement		

The uses shown under Use Class E in Table 6.1 would be secured by means of an appropriately worded planning condition.

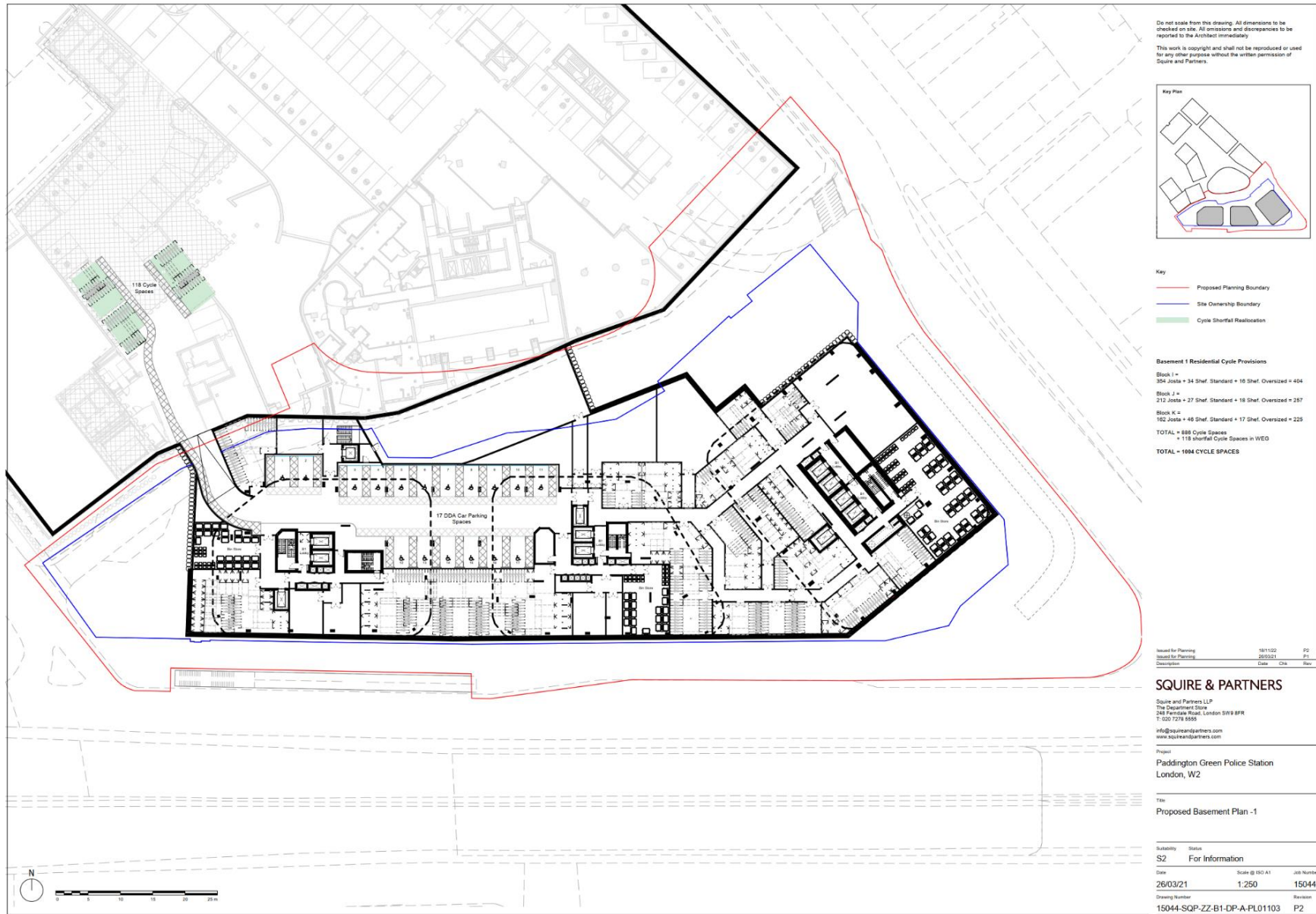


Figure 6.1: 2022 Amended Proposed Development Basement Level 1 Plan



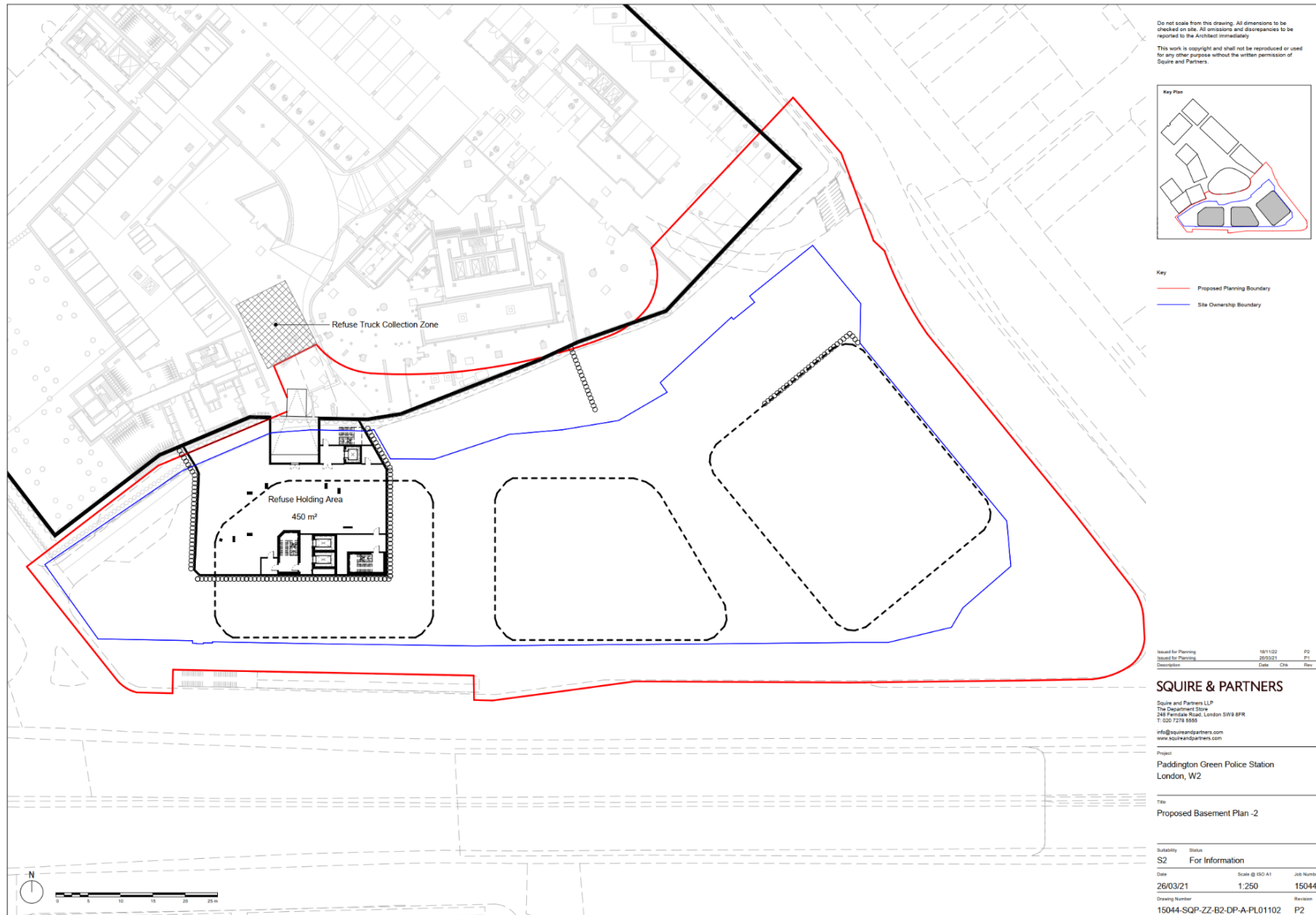


Figure 6.2: 2022 Amended Proposed Development Basement Level 2 Plan



Figure 6.3: 2022 Amended Proposed Development Ground Floor Plan



Figure 6.4: 2022 Amended Proposed Development Typical Floor Plan

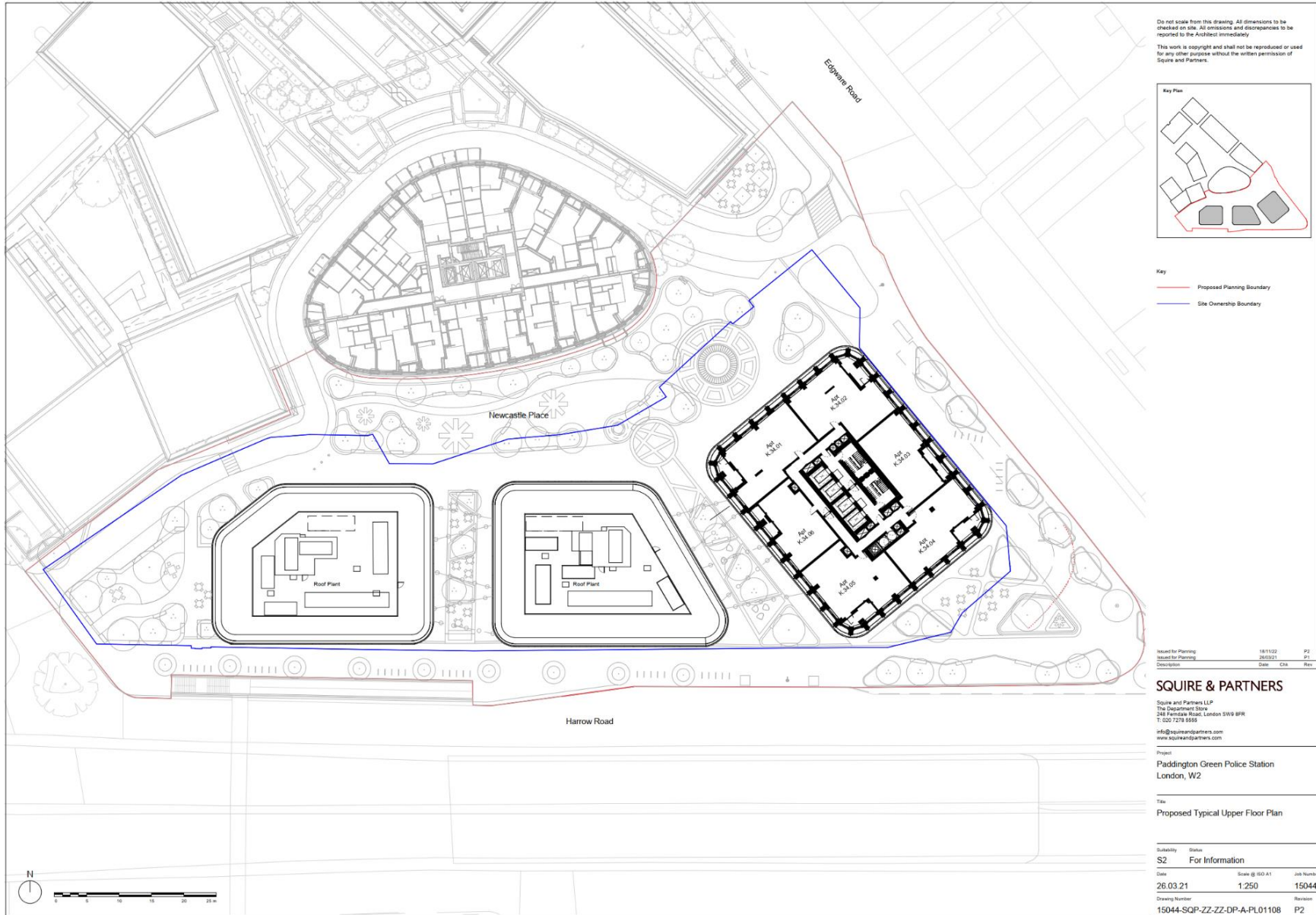


Figure 6.5: 2022 Amended Proposed Development Typical Upper Floor Plan

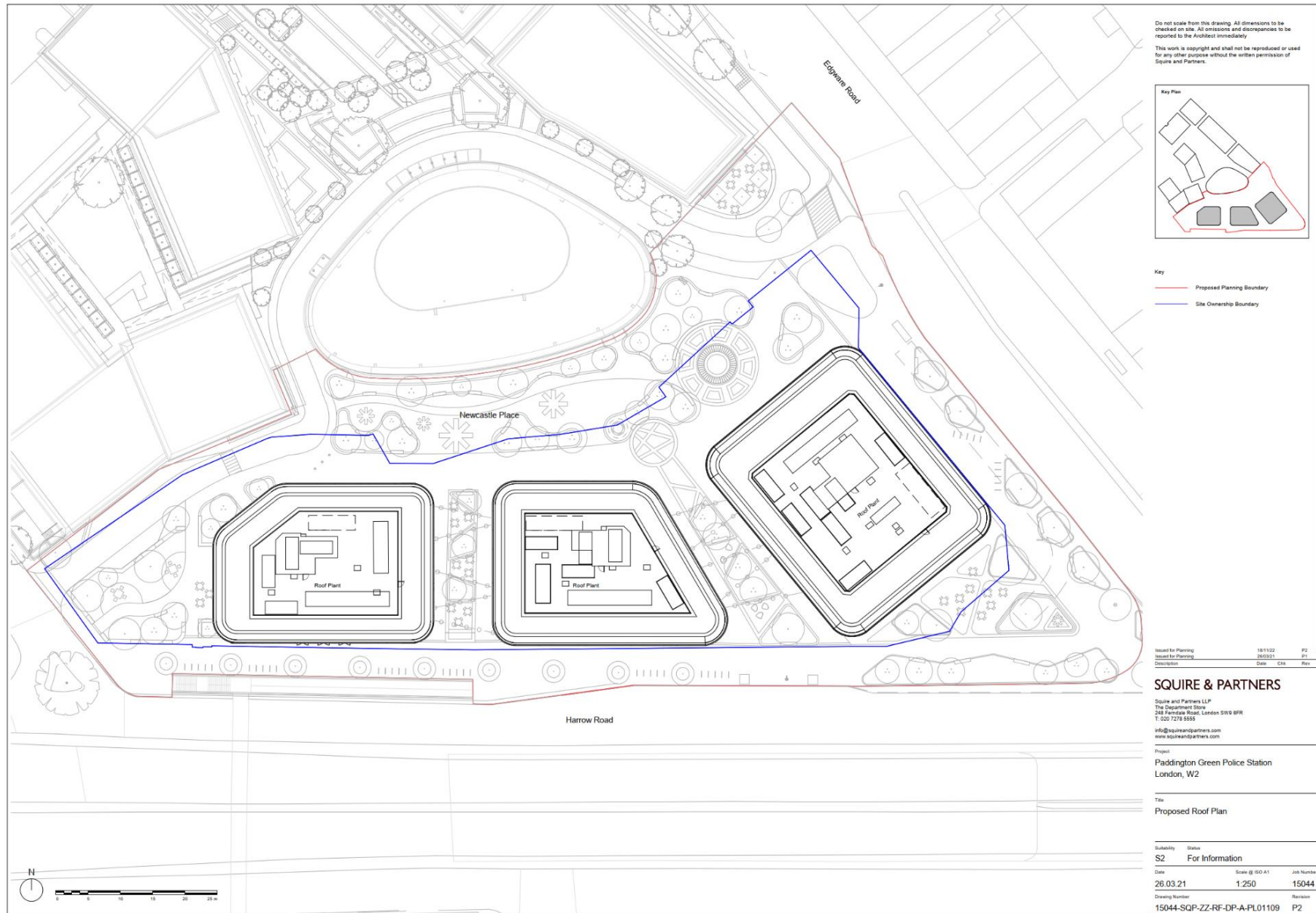


Figure 6.6: 2022 Amended Proposed Development Roof Plan

The residential unit and tenure mix is shown in Table 6.2.

Tenure	MH	One-bed	Two-bed	Three-bed	Four-bed	Total
<b>Intermediate</b>	13	59	38	0	0	110
<b>Social Rented</b>	0	11	50	46	2	109
<b>Private</b>	22	77	139	93	6	337
<b>Total by Unit</b>	<b>35</b>	<b>147</b>	<b>227</b>	<b>139</b>	<b>8</b>	<b>556</b>
<b>% by unit</b>	6.3	26.4	41.0	25.0	1.4	100

In total 39.4 % affordable housing (by residential unit) would be delivered comprising 19.6 % social rented and 19.8 % intermediate housing.

### 5.5 Built Form, Height and Massing

The 2022 amended proposed development's building heights are summarised in Table 6.3

Blocks	Height (m AOD)	Number of Storeys
I	115.29	24
J	92.724	17
K	166.304	39

### 5.6 Material Palette and Façade Detailing

The design of Blocks I, J and K have been informed by the surrounding context.

The built form and typology of each building would be as follows:

- Block I and J: would comprise a series of terracotta coloured glass reinforced concrete (GRC) columns to define the bays. The designs would embellish the detail further with bronze coloured aluminium mullions that would run full height either side of the reconstituted stone panels to bring another layer of detail and refinement. The window systems would comprise consistent bronze coloured aluminium window systems, continuing the detailing and tones used on the WEG development and ensuring that the 2022 amended proposed development reads as a whole; and
- Block K: GRC columns and spandrels would define the solid area of each façade and bring a level of rigour and repetition to the facades. This would be accentuated with the careful detailing of the material that varies from building to building. The tower would comprise white GRC columns to bring a more organic feel to the façade treatment of the tallest building.

### 5.7 Public Realm and Open Space

A total of 4,755 m<sup>2</sup> of public realm and open space would be delivered across the 2022 amended proposed development.

Hard and soft landscaping would be provided across the site. The public realm would be softened with extensive new trees and planting. Edgware Road and Harrow Road would be paved with artificial stone pavers, with some highlighted detailed paving to designate entries to retail units. The pedestrian footways between the blocks would be upgraded with stone paving in keeping with the historic nature of this precinct. Newcastle Place and the new link into the site would be paved in stone units with contrasting size and pattern.

In total 840 m<sup>2</sup> of play space would be delivered on-site for the 2022 amended proposed development. This would be in addition to the 310 m<sup>2</sup> of allocated play space for the neighbouring WEG development to be delivered on-site. Accordingly a total of 1,150 m<sup>2</sup> of play space would be brought forward within the site. Given the constraints of this Central London site, play space allocation would focus on providing play opportunities for younger children and their carers. As well as the on-site play provision, residents would benefit from the number and extent of green spaces within walking distance of the site. The large expanses of Hyde Park and Regents Park are both within walking distance of the site, whilst Paddington, St Mary's Church Yard and the parks of Little Venice and Maida Vale are in the more immediate vicinity. Play provisions for 12 years and older would be provided by the numerous facilities and play areas within close proximity of the site. Financial contributions would supplement the on-site provision.

## 5.8 Landscape and Biodiversity Enhancement

The existing biodiversity on site is very limited; the 2022 amended proposed development, therefore, presents an opportunity for substantial biodiversity enhancement through:

- extensive landscape planting comprising a mosaic of habitats;
- planting of native and non-native tree species;
- bird boxes incorporated into the 2022 amended proposed development; and
- biodiverse green roofs.

A Biodiversity Net Gain Assessment has been undertaken which has quantified the level of biodiversity change from the existing site to the 2022 amended proposed development. The increase in biodiversity has been calculated at 224.42 %. These biodiversity gains would be significantly more than the 10 % net gain required by planning policy for area-based habitats and singular/street trees.



## **5.9 Access and Egress**

The 2022 amended proposed development has been designed as a 'car free' scheme and therefore limited vehicular access is provided, aside from a policy compliant proportion of accessible car parking spaces at the basement level, accessed through the WEG basement from Church Street.

Additional vehicular access to the site would be provided from Newcastle Place, primarily for deliveries to the residential units. This access would be limited to day-to-day deliveries via dedicated loading bays.

Pedestrian and cycle access from the public highway network would be via entrances on Newcastle Place, Harrow Road and Edgware Road. Footways would be provided along the extent of the site frontage which would connect with the existing pavement.

Service access to the 2022 amended proposed development would be via the basement levels accessed off Church Street. Emergency vehicle access to the site would be provided from Edgware Road onto Newcastle Place.

## **5.10 Parking**

The 2022 amended proposed development would provide 17 accessible car parking spaces at basement level B1 in line with policy requirements. Of these spaces 50 % would be provided with active electric charging point (EVCPs). The remaining 50 % of spaces would be provided with the capacity to be fitted with EVPCs should these be required in the future.

The 2022 amended proposed development would provide a minimum of 1,012 long stay cycle parking spaces. An additional 104 long stay cycling parking spaces would be provided within the WEG basement to meet new London Plan standards.

Cycle racks for 81 short stay cycle spaces would be distributed within the public realm across the site.

The concierge management of the site would maintain and manage day-to-day operations.

## **5.11 Waste Management**

A waste strategy has been produced to accompany the application which provides details on the total estimated waste arising from the 2022 amended proposed development.

Sufficient space within each of the waste storage areas has been provided to accommodate the required number of refuse, recyclable and food waste containers assuming a weekly waste collection frequency.

Waste generated within the 2022 amended proposed development would be collected in the waste waiting area located in basement level B2. The capacity of this waiting area is based on the bin storage requirements for Blocks I, J and K to allow the collection of the refuse, recyclables and food waste bins that would require presentation on a weekly basis.

On the collection day nominated by WCC, the on-site facilities management team would transport the bins containing the waste or recyclables using an electric vehicle, to the waste presentation area at basement level via the car park access roads.

## **5.12 Plant and Ventilation**

An all electric and zero fossil fuel heating and cooling strategy has been proposed to minimise carbon emissions. Heating and hot water for the residential areas and non-residential landlord areas of the 2022 amended proposed development would be served by high temperature air source heat pumps (ASHP) and PV panels at roof level. A connection to the combined heat and power (CHP) led energy centre located within the adjacent WEG development would also be delivered for resilience purposes.



In respect of ventilation, each residential apartment would be provided with a Mechanical Ventilation Heat Recovery (MVHR) unit. The façade of Blocks I, J and K are proposed to incorporate low-e solar shield glass to reduce the amount of solar heat entering apartments. Low energy lighting would be specified throughout residential areas to reduce internal heat gains from luminaries. Additionally, motion sensors would be applied throughout relevant areas to help reduce lighting demand and turn off lighting when spaces are unoccupied or adequately day-lit reducing internal heat gains from luminaires.

In order to mitigate the risk of overheating the design would use a combination of passive and non-passive measures.

### 5.13 Health and Wellbeing Measures

The 2022 amended proposed development has sought to promote and encourage healthier lifestyles through the following measures:

- Providing access to open space and amenity space;
- Providing access to employment opportunities;
- Providing housing in a range of residential unit types and tenures; appropriately sized; energy efficient; warm and dry;
- Providing on-site flexible commercial uses;
- Providing safe, accessible spaces;
- Providing cycle spaces and promoting walking; and
- Avoiding exposure to excessive noise, vibration, light spill, overheating or poor air quality.

### 5.14 Operational Management Controls

An operational management plan would be prepared and implemented at the 2022 amended proposed development for all elements.

A Delivery Servicing Plan and a Waste Management Strategy would be prepared and implemented at the 2022 amended proposed development.

Design measures have been incorporated in respect of emergency and disaster management.



## 6. DEMOLITION AND CONSTRUCTION WORKS

### 6.1 Overview

The demolition and construction works would be phased over a seven year period. It is anticipated that works would commence in Q3 2023, with completion targeted for Q3 2030.

### 6.2 Construction Environmental Management Plan

The framework presented in ES Chapter 5(R): Demolition and Construction Description would form the basis for a Construction Environmental Management Plan (CEMP) and has been developed in accordance with standard best practice, regulatory requirements, as well as WCC's Code of Construction Practice (CoCP) and Basement Development Supplementary Planning Document. The CEMP would include a Construction Logistics Plan (CLP) and a Site Waste Management Plan (SWMP) and would be submitted for review and approval by WCC prior to commencement of works on-site. It would include the following:

- A commitment to environmental protection (all consultants and trade contractors would be invited to declare their support for this at tender stage);
- Documentation of measures to comply with environmental aspects of any planning conditions;
- Detailed control measures and activities to be undertaken to minimise likely environmental impacts, as well as associated roles and responsibilities;
- Target criteria for environmental issues, where practical, such as water and energy consumption;
- Any requirements for monitoring and record keeping;
- Proposed noise, vibration and dust monitoring levels to be agreed by WCC;
- A dedicated point of contact during normal working hours and in emergencies with responsibility to deal with environmental issues if they arise; and
- A review and monitoring regime of on-site performance against the CEMP provisions by the project team and regular environmental audits of its implementation.

### 6.3 Community Liaison

The Applicant would engage with and inform the local community and local stakeholders of particular construction tasks and indicative timelines across the individual construction phases and would ensure that both parties are fully involved in any such dialogue.

Matters for public consultation during the demolition, bulk excavation and piling works would be brought to the public's attention through staging drop-in exhibitions and the circulation of bespoke newsletters within the established catchment area. Local stakeholders would be engaged in direct communication with the Applicant, design team and other such consultants as required from time to time through the established Resident's and Community Liaison Groups. These groups would be open to new members as and when required and would be run in accordance with the stipulations of WCC.

### 6.4 Working Hours

Working hours would be agreed with WCC, but are expected to be:

- 08:00 to 18:00 hours Monday to Friday;
- 08:00 to 13:00 hours Saturday; and
- No working on Sundays or Bank Holidays.

All work which is intended outside of these hours, excluding emergencies, would be subject to prior agreement, and / or reasonable notice to WCC and other relevant parties.

## 6.5 Potential Demolition and Construction Environmental Effects

The main sources of potential environmental effects during demolition and construction of the 2022 amended proposed development have been identified as:

- above and below ground heritage assets;
- transport and pedestrian infrastructure;
- noise and vibration;
- air quality;
- soil and groundwater;
- ecology;
- natural resource use;
- site workers;
- residential amenity;
- existing views;
- townscape; and
- heritage.



## 7. LIKELY SIGNIFICANT ENVIRONMENTAL EFFECTS OF PROPOSED DEVELOPMENT

### 7.1 Socio-Economics

#### 7.1.1 Demolition and Construction Effects

The demolition and construction works associated with the 2022 amended proposed development would generate 84 net demolition and construction jobs over the 85 month development programme. To maximise local recruitment, enhancement measures would comprise commitment to advertise job vacancies in local job agencies and newspapers in accordance with 'local and relevant postcodes' to maximise those employed locally as well as local provision of skills training. These measures would be secured by means of an appropriately worded planning condition. The residual effect would be beneficial and significant at the local authority level.

#### 7.1.2 Completed Development Effects

The 2022 amended proposed development would deliver 556 new residential units which would represent 5.6 % of the ten-year London Plan housing target and 56.4 % of the annual target, which would result in a significant beneficial residual effect at the neighbourhood level. The effect at local authority level would not be significant.

The introduction of a new residential population of 1,254 people which would create a demand for the equivalent of approximately 0.7 of full time GPs. There is currently a substantial deficit in the capacity of the local GP surgeries; with the 2022 amended proposed development adding further pressure.

The 2022 amended proposed development would give rise to an estimated child yield of 231, with demand for 77 primary school places and 36 secondary school places. There is currently a surplus in both primary and secondary school places in the local area and this is expected to remain in the future; however, the 2022 amended proposed development would put pressure on future demand.

Financial contributions for healthcare and education would be made. The contributions collected from the 2022 amended proposed development can be used at the discretion of WCC to fund provision, improvement or operation of new or existing community facilities and other types of social infrastructure. Accordingly, the residual effects on both healthcare and education facilities would be neutral and not significant.

The 2022 amended proposed development would deliver 0.4755 ha (4,755 m<sup>2</sup>) of open space, and although this would fall short of WCC policy requirements, it is considered a beneficial amount due to the constrained nature of the site, resulting in an overall neutral, but not significant, residual effect.

In total 840 m<sup>2</sup> of playspace would be brought forward on-site for the 2022 amended proposed development, which would fall short of the GLA policy requirements for the new population. Financial contributions towards play space would be made to take account of the population increase, which would result in a beneficial, but not significant, residual effect.

The provision of non-residential floorspace as part of the 2022 amended proposed development would create employment. This space would create approximately 50 to 67 gross direct operational jobs which would be equivalent to 20 to 26 net operational jobs. In the context of the local economy this would have a beneficial, but not significant, residual effect.

Increased local expenditure as a result of the residents and employees at the 2022 amended proposed development, would have a beneficial, but not significant, residual effect.

The 2022 amended proposed development has been designed with security in mind in order to meet Secured by Design standards and would deliver a safe and secure scheme which would result in a beneficial, but not significant, residual effect on crime at the neighbourhood level.

## 7.2 Air Quality

The main air pollutants of concern are dust and particulate matter with an aerodynamic diameter of less than 10 microgram ( $PM_{10}$ ), typically generated during demolition and construction activities, and nitrogen dioxide ( $NO_2$ ),  $PM_{10}$  and particulate matter with an aerodynamic diameter of less than 2.5 microgram ( $PM_{2.5}$ ), typically generated by road traffic and combustion engines emissions.

### 7.2.1 Demolition and Construction Effects

During the demolition and construction stage, there is the potential that emissions of dust arising from the site could result in a loss of amenity at nearby existing residential and commercial properties.

Based on recognised assessment criteria, the demolition and construction works present a high risk of adverse dust impacts in the absence of appropriate mitigation. With the implementation of suitable mitigation measures, which have been set out within the Replacement ES, as well as in the CEMP to be secured by means of an appropriately worded planning condition, it is anticipated that dust impacts would be appropriately mitigated. Any residual adverse effects would be not significant.

Predicted generation of heavy goods vehicle (HGV) movements during the demolition and construction stage has been estimated to increase local flows by a maximum of five HGVs per day. Such an increase would have an insignificant impact on air quality. Demolition and construction traffic would also be controlled through the CEMP and Construction Logistics Plan (CLP). It is considered that emission from this number of vehicles would not result in significant effects on local air quality.

### 7.2.2 Completed Development Effects

Concentrations of  $NO_2$ ,  $PM_{10}$  and  $PM_{2.5}$  have been predicted for a number of worst-case locations representing existing properties adjacent to the road network, as well as new sensitive receptor locations within the 2022 amended proposed development.

The Air Quality Objectives are policy targets often expressed as maximum concentrations not to be exceeded. The predicted modelled concentrations would be well below the relevant air quality objectives at all of the existing receptor locations with the 2022 amended proposed development in place. It is considered that emissions from vehicles associated with the 2022 amended proposed development would result in not significant effects on local air quality.

Concentrations of  $NO_2$ ,  $PM_{10}$  and  $PM_{2.5}$  have also been predicted at new sensitive receptor locations within the 2022 amended proposed development. At these locations, air quality is predicted to meet all relevant air quality objectives and therefore the 2022 amended proposed development would not introduce new receptors into an area of poor air quality and the site would be suitable for the intended uses.

Emerging policy and WCC air quality plan commitments have indicated that the 2005 WHO guideline value for  $PM_{2.5}$  should be met by 2030. The conservative future  $PM_{2.5}$  concentrations with the 2022 amended proposed development complete are predicted to be slightly above the 2005 WHO guideline at on-site receptors up to the 3<sup>rd</sup> floors of Block I, up to the 4<sup>th</sup> floor at Block J and K, and at every modelled height for receptors at Block K, adjacent to Edgware Road. To ensure appropriate mitigation is provided to those units where façade concentrations are predicted to exceed the guideline, it is recommended that prior to commencement of construction, an up-to-date assessment with the latest monitoring data and modelling tools is submitted to establish the

baseline conditions at the time of construction and determine the need for mitigation in the form of PM<sub>2.5</sub> filtration. The updated assessment could be secured by means of an appropriately worded planning condition.

The air quality neutral assessment has shown that as the 2022 amended proposed development would not have any building emissions from combustion sources and transport emissions would be low, both the building and transport emissions benchmarks are met and the 2022 amended proposed development can be considered Air Quality Neutral.

### **7.3 Noise and Vibration**

#### **7.3.1 Demolition and Construction**

During demolition and construction works, there would be plant noise, traffic noise and vibration sources.

Plant noise from demolition of the existing site and construction of the 2022 amended proposed development would result in a significant effect on all receptors, except at St Mary's Church, Little Venice. However, this would only occur for discrete demolition and construction activities and periods when different phases of construction are overlapping.

Demolition and construction traffic would result in no significant effects on local sensitive noise receptors, due to the relatively small number of construction vehicles on a road network with existing high levels of traffic.

The assessment of demolition and construction vibration effects on human receptors and buildings concluded that significant adverse effects are likely in respect of the residential occupants of the two closest buildings at the WEG and 14-17 PG developments. This is due to the proximity of proposed piling and excavation works. However, following the adoption of additional mitigation measures, including the use of appropriate piling techniques, to be secured through the CEMP, effects could be reduced to non-significant adverse effects. Effects to all other receptors would also be adverse but not significant.

In addition, it has been recommended to carry out a condition survey of the two closest buildings before the works commence.

#### **7.3.2 Completed Development**

Operational traffic was considered as part of the scoping process and was 'scoped out' of the EIA. Given that the existing levels of traffic are high and the 2022 amended proposed development would result in only a small increase on the road network, no significant change in traffic noise level is predicted.

However, the 2022 amended proposed development now proposes the complete closure of the existing Newcastle Place and routing of vehicles on a loop road around the northern facade of WEG Block A. The traffic data used to assess the associated road traffic noise is based on an assumption that all of the current traffic and vehicle types on Newcastle Place would use the loop road. This is the absolute worst-case as in practice HGVs would not be able to access the loop road. Noise modelling undertaken shows that the volume of traffic on the loop road would not increase noise levels at the northern facades of WEG by more than 1dB. Accordingly, the effects of the loop road on residential receptors at WEG and other locations would be adverse but not significant.

Fixed plant noise, commercial noise and site suitability for residential use have been assessed.

Operational plant rating limits have been set in accordance with best practice guidelines and WCC requirements. All fixed plant installations would be fitted with attenuation and acoustic screening, as required to meet the noise emissions limits. Mitigation would be developed during detailed

design and the required noise levels would be secured by means of an appropriately worded planning condition. On this basis, no significant effects are predicted.

Noise transfer between residential and commercial units would be avoided by achieving appropriate noise limits in line with the Building Regulations requirements. On this basis, the effects from commercial noise would be adverse but not significant.

Based upon measured noise levels and modelling of the cumulative traffic flows, the ambient noise levels on the proposed building facades have been predicted. Minimum sound insulation performance requirements have been provided for the façades to achieve the required internal noise levels. This would be further developed during detailed design and secured by means of an appropriately worded planning condition. In respect of external amenity noise levels, the 2022 amended proposed development has been designed to achieve the lowest practicable levels in the proposed external amenity spaces, as recommended within published guidance and best practice, and alternative quieter external amenity areas are available in the vicinity. On this basis the site is considered suitable for residential development from an acoustics perspective.



## 7.4 Wind Microclimate

Wind tunnel modelling of the existing baseline and completed 2022 amended proposed development within the future baseline, was undertaken. Mitigation measures informed the landscape design.

For the existing baseline 131 locations were tested. The wind conditions around the existing site were reported as being suitable for sitting and standing use during the windiest season and being suitable for sitting and standing use during the summer season. No safety exceedances due to strong winds were recorded for the existing baseline scenario.

### 7.4.1 Demolition and Construction

During demolition and construction works, there would be no public access to the site.

Hoarding would be implemented around the site to restrict access to the site by demolition and construction workers. Wind conditions on-site would be suitable for a construction site. Off-site receptor locations are predicted to be suitable for the intended pedestrian uses.

As construction of the 2022 amended proposed development proceeds, the wind conditions of the 2022 amended proposed development and the study area would gradually adjust to those described below for the completed development taking into account proposed design mitigation. On account of the minor exceedances reported at six locations in the completed development, effects would range from not significant, to significant adverse.

### 7.4.2 Completed Development

Five configurations were wind tunnel tested using a 1:300 scale model of the 2022 amended proposed development and the study area taking into account the existing baseline and future baseline (with WEG and 14-17 PG schemes completed and their associated landscaping, excluding overlapping landscape proposals); the 2022 amended proposed development; and cumulative schemes.

For the completed development stage, 194 locations were assessed to cover additional on-site sensitive locations and elevated spaces.

With the 2022 amended proposed development complete and operational, the majority of the site would have suitable wind conditions. In the absence of landscaping, there would be 23 measurement locations representing two entrance locations, one bus stop and 20 seating spaces which would have conditions windier than suitable for their intended uses. Additionally, there would be two locations with strong wind exceedances which would pose safety concerns.

With the introduction of the proposed landscaping scheme and mitigation measures incorporated into the building design such as recessed entrances at Block K, wind conditions would improve. However, windier than suitable seating areas would persist at six measurement locations, where conditions would be suitable for standing.

With the exception of the above-mentioned six seating areas, the 2022 amended proposed development would be suitable for pedestrian use, and as such would not give rise to significant adverse effects in respect of wind microclimate. At the six seating areas south of Block K, occupants would be expected to use nearby spaces which would have suitable conditions on days when these locations are windy. Additional landscape mitigation has been proposed for these locations.

Residual effects would range from beneficial (significant and not significant) at locations suitable for their intended uses to significantly adverse for the six windier than suitable seating areas.



## **7.5 Daylight, Sunlight and Overshadowing**

### **7.5.1 Demolition and Construction**

The magnitude of impact and resultant likely effects in relation to the daylight, sunlight and overshadowing at surrounding sensitive receptors would vary throughout the demolition and construction stage, depending on the level of obstruction caused. The impact would almost certainly be less than that of the completed 2022 amended proposed development, given that the extent of permanent massing would increase throughout the construction stage, until the buildings are completed. During the demolition and construction stage, a number of tall cranes are also likely to be present on-site; however, their size and temporary presence would lead to imperceptible effects of a temporary nature.

Therefore, impacts would range from low, throughout demolition and commencement of construction, gradually increasing to significant adverse effects as the 2022 amended proposed development is constructed. The solar glare effects would also range from adverse but not significant to adverse, significant effects.

### **7.5.2 Completed Development**

The assessment considered the change in daylight, sunlight and overshadowing levels at surrounding sensitive residential and amenity areas when compared against existing and future baseline levels.

Surrounding residential receptors have been assessed for daylight and sunlight effects arising from the 2022 amended proposed development. These include existing neighbours on Corlett Street, Penfold Place, Church Street, Bell Street, Penfold Street and Edgware Road. Residential neighbours within West End Gate have also been assessed. Finally, as it is anticipated that 14-17 Paddington Green would be built and occupied prior to the completion of the 2022 amended proposed development, this development has been included in the assessment. Additionally, the consented residential accommodation within the Merchant Square development has been assessed as a future sensitive receptor.

In relation to daylight, of the 41 existing residential receptors assessed for daylight effects, a total of 30 existing receptors would not experience significant effects. The remaining 11 would experience significant adverse effects.

Within WEG, Blocks C, D and E-F would not experience significant effects; however, Blocks A and B would. Both Blocks G and H of 14-17 PG would also experience significant adverse effects.

Where significant effects occur, the levels of light remaining are in most instances considered acceptable given the inner-city urban location. The few isolated areas where lower levels of light occur are predominantly a function of architectural features, as evidenced by low baseline levels also, which increase the impact of the 2022 amended proposed development. For WEG and 14-17 PG, such features include balconies of the buildings themselves and / or significant obstructions that occur from other blocks of WEG and 14-17 PG. Comparable levels can be found along other elevations of WEG and 14-17 PG, facing away from the site, therefore the residual levels of light are considered appropriate for the context. In addition, many of the affected rooms within WEG and 14-17 PG are known to be bedrooms which are less sensitive to changes in light or are dual-aspect living-kitchen-dining (LKD) rooms that receive light from more than one direction.

In relation to sunlight, of the 40 existing residential receptors assessed for sunlight, a total of 32 existing receptors would not experience significant effects. The remaining eight would experience significant adverse effects. Where significant effects occur, the levels of sunlight remaining are in most instances considered acceptable given the inner-city urban location. The few isolated areas where lower levels of sunlight occur are predominantly a function of existing buildings within the immediate context restricting sunlight availability.

Within WEG, Blocks C, D and E-F would not experience significant effects; however, Blocks A and B would. Both Blocks G and H of 14-17 PG would also experience significant adverse effects. As in the case of the daylight assessment, many of the affected rooms are known to be bedrooms which are less important in terms of sunlight or are dual-aspect LKDs that receive light from more than one direction. The few isolated areas where lower levels of sunlight occur are predominantly a function of architectural features such as balconies of the buildings themselves and / or significant obstructions that occur from other blocks of WEG and 14-17 PG, as evidenced by low baseline levels also, which increase the impact of the 2022 amended proposed development.

With regard to both sunlight and daylight effects, it is to be expected that where a building currently faces an underdeveloped site, significant effects would be likely for any proposal that comes forward seeking to make optimum use of land.

With regard to overshadowing effects, amenity areas within 90 degrees of due north of the 2022 amended proposed development which would potentially be affected have been considered within the assessment. These include public amenity spaces and private/communal amenity spaces. All five existing amenity areas tested would not experience significant adverse effects.

The potential for solar glare from the façade of the 2022 amended proposed development upon surrounding road junctions, where reflections could potentially result in adverse effects have been assessed. Of the 29 viewpoints assessed, viewpoints 17 and 18 at Harrow Road would experience significant adverse effects. Of the remaining 27 viewpoints, no significant adverse solar glare effects were identified.

## **7.6 Townscape, Visual and Built Heritage**

In respect of heritage, the north-western half of Newcastle Place within the site boundary is located within Paddington Green Conservation Area.

There is also potential for setting effects on other heritage receptors in the surrounding area, including seven conservation areas (Maida Vale, Lisson Grove, Bayswater, Regent's Park, St John's Wood, Queensway and Westbourne), two Registered Parks (Regent's Park and Hyde Park), four grade II\* listed buildings (the Church of St Mary, Marylebone Lower House North Westminster Community School, Christ Church on COSWAY Street and the pavilion at Lord's cricket ground), and a number of grade II listed buildings (the Children's Hospital, 17 and 18 Paddington Green, Nos. 4-16 (even) Warwick Avenue and No. 20 Howley Place, 22-42 Norfolk Square, 3-33, 18-42 Orsett Terrace and 168-213 Sussex Gardens). There is no potential for significant setting effects on non-designated heritage assets (unlisted buildings of merit).

In respect of townscape, six-character areas were identified for assessment.

In total 48 viewpoints were identified for assessment of the likely effect of the 2022 amended proposed development on visual receptors. The viewpoints included in this assessment were agreed with the WCC during Scoping and with the WCC Planning Committee members and GLA post-submission.

In respect of views, the site is not located within the Landmark Viewing Corridor of any identified strategic views in the London View Management Framework (LVMF). However, consideration was given to the strategic views from Primrose Hill (LVMF 4A.1, Viewpoint 26 in the assessment) for completeness, although this is repositioned towards the site.

### **7.6.1 Demolition and Construction**

The demolition and construction effects to built heritage, townscape and visual receptors would range from none to adverse due to the presence and visibility of demolition and construction plant and activity. This would be expected within an area of London which is subject to regeneration in line with development plan policy. The effects would not be significant.

### 7.6.2 Completed Development

In respect of built heritage, the heritage receptors would experience none to beneficial but not significant effects. The beneficial effects would apply to the listed structures at Marylebone Lower House North Westminster Community School (grade II\*). The beneficial effect would be derived from the overall improvement to the setting in which the listed buildings are appreciated. There is also a beneficial but not significant effect on Paddington Green CA, deriving from the redevelopment of a large building of poor quality with three attractive well-designed buildings and improved public realm.

The assessment identified a potential adverse but not significant effect to No. 14 and 16 Warwick Avenue, because the 2022 amended proposed development would appear above the roofline of the houses, albeit in transient and incidental views. A potential adverse but not significant effect was identified to Regent's Park CA and RPG, because tall buildings are currently less prominent within Regent's Park than Hyde Park. A non-significant, adverse effect was also identified on Hyde Park RPG.

In respect of townscape, there would be a significant, beneficial effect on the character area in which the site is located (Paddington Green). There would also be beneficial but not significant effects on the Paddington Basin and surrounding area character area, as well as the Marylebone Road character area. Beneficial effects to all other surrounding character areas would be negligible.

In respect of visual, there would be significant beneficial effects on the visual receptors experiencing the 2022 amended proposed development in two views from Westbourne Terrace Road Bridge, Little Venice. The remaining visual receptors and views would be beneficial but not significant. Figures 8.1-3 - 8.4 presents a small selection of the accurate visual images prepared of the 2022 amended proposed development.





Figure 8.1: View 3 - Edgware Road Looking North



**Figure 8.2: View 6W - Winter View from Westbourne Terrace Road Bridge**



**Figure 8.3: View 17W - Winter view from Paddington Green/St Mary Churchyard**



**Figure 8.4: View 35 - Blomfield Road just West of Warwick Avenue**

The 2022 amended proposed development would not give rise to any unacceptable effects to heritage, townscape or visual receptors. On the whole, the 2022 amended proposed development would demonstrably improve the appearance, character and function of the townscape.

## 8. CUMULATIVE EFFECTS

### 8.1 Intra-Project Cumulative Effects

Intra-project cumulative effects from the 2022 amended proposed development itself on surrounding sensitive receptors and on-site receptors during the demolition and construction works and also once the 2022 amended proposed development is completed, were considered.

#### 8.1.1 Demolition and Construction

Intra-project cumulative effects are likely to arise at existing off-site commercial and community users; existing off-site residents, future on-site residents (of Phase 1 occupants); and existing users of off-site open/amenity space in respect of dust; noise; employment generation; local daylight, sunlight and overshadowing changes and visual effects.

Significant adverse effects during the demolition and construction stage are likely at existing off-site and future on-site residents (of Phase 1 occupants);.

For existing off-site receptors (including residents, commercial and community users and users of off-site open space), significant effects from demolition and construction noise would be limited to initial enabling/demolition and periods of peak construction activity overlapping works whereas the daylight, sunlight and overshadowing effects would arise as the 2022 amended proposed development massing reaches completion, therefore the interaction between these effects would be limited. Furthermore, air quality and noise emissions would be carefully managed throughout the demolition and construction programme and through the implementation of the CEMP, based on the Applicant's experience at WEG.

For future on-site residents, the new occupants of Phase 1 would be moving into an area subject to ongoing construction knowingly.

#### 8.1.2 Completed Development

Intra-project cumulative effects are likely to arise at existing off-site residents; future on-site residents; existing and future users of off-site and on-site open and amenity space in respect of housing delivery; generation of operational employment; as well as local wind, daylight, sunlight and overshadowing changes.

No significant adverse intra-project cumulative effects are likely to arise as a result of the completed development.

### 8.2 Inter-Project Cumulative Effects

Consistent with the effects of the 2022 amended proposed development, the cumulative schemes would deliver high quality new housing and public realm improvements, generate employment and have a beneficial effect on the local economy through additional spending. In addition, the schemes would seek to promote more sustainable modes of transport (with the majority being car free). The cumulative schemes would contribute to the ongoing high-rise redevelopment of the study area and thereby add to the changing townscape character and local views.

It is reasonably assumed that the cumulative schemes would make appropriate financial contributions towards community infrastructure, public transport capacity and highway works as necessary, to off-set or reduce their individual environmental effects.

Where there are potential overlaps of the demolition and construction stages of the 2022 amended proposed development with cumulative schemes, significant cumulative construction effects are unlikely to occur as each scheme is anticipated to employ similar environmental management plans and best practice measures such that the individual construction stage effects are not significant, alone or in-combination.



## 9. SUMMARY

The 2022 amended proposed development has evolved through a detailed understanding of the site, its emerging surrounding context, the aspirations of local and regional policy, and extensive consultation with WCC, key stakeholders and the general public.

The 2022 amended proposed development would deliver a high-quality residential-led development which would comprehensively regenerate the site and complete the WEG masterplan.

The following significant beneficial environmental effects have been identified:

- Generation of demolition and construction employment at a local economic level providing jobs for existing local residents and new workers;
- Housing delivery at the neighbourhood level;
- Change in Views 6 and 6W Westbourne Terrace Road Bridge, Little Venice; and
- Change in Paddington Green Townscape Character.

The following significant adverse environmental effects have been identified:

- On-site demolition and construction plant and activity noise at existing off-site receptors at City of Westminster College, Paddington Green Campus, North Wharf Gardens East (Hotel and School), Hilton, Residential premises on Edgware Road, WEG, 14-17 PG, Princess Louise Close, Paddington Green Health Centre and Phase 1 (on-site occupiers) of the 2022 amended proposed development;
- Windy conditions at six locations upon completion and operation;
- Changes in daylight and sunlight levels at surrounding residential receptors as the massing of the 2022 amended proposed development is constructed and reaches completion;
- Changes in daylight levels at the following surrounding residential properties upon completion and operation:
  - Edgware Road (316, 326, 328, 330, 332, 334-336, 338, 340, 342, 344 and 346);
  - WEG Blocks A and B;
  - 14-17 PG Blocks G and H;
- Changes to sunlight levels at the following surrounding residential properties upon completion and operation:
  - 19a-19o Corlett Street;
  - 33 Bell Street;
  - Edgware Road (342, 344, 348, 350 and 352);
  - WEG Blocks A, B; and
  - 14-17 PG Blocks G and H.
- Changes to solar glare:
  - Viewpoint 17 – Harrow Road; and
  - Viewpoint 18 – Harrow Road.

Identified additional mitigation measures would be secured by means of appropriately worded planning conditions and financial contributions.