# Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contents</td>
<td>1</td>
</tr>
<tr>
<td>1. Introduction</td>
<td>2</td>
</tr>
<tr>
<td>1.1 The Planning Application</td>
<td>2</td>
</tr>
<tr>
<td>1.2 Brief Description of the Site</td>
<td>2</td>
</tr>
<tr>
<td>1.3 Environmental Impact Assessment Methodology</td>
<td>3</td>
</tr>
<tr>
<td>1.4 Environmental Statement Documentation</td>
<td>4</td>
</tr>
<tr>
<td>1.5 Project Team</td>
<td>4</td>
</tr>
<tr>
<td>2. Public Consultation and Planning Policy</td>
<td>4</td>
</tr>
<tr>
<td>2.1 Statutory consultation</td>
<td>4</td>
</tr>
<tr>
<td>2.2 Public Consultation</td>
<td>5</td>
</tr>
<tr>
<td>2.3 Planning Policy Context</td>
<td>5</td>
</tr>
<tr>
<td>3. Alternatives and Design Evolution</td>
<td>5</td>
</tr>
<tr>
<td>3.1 No Development</td>
<td>6</td>
</tr>
<tr>
<td>3.2 Alternative Sites</td>
<td>6</td>
</tr>
<tr>
<td>3.3 Alternatives Designs and Evolution of the Proposed Development</td>
<td>6</td>
</tr>
<tr>
<td>4. The Proposed Development</td>
<td>6</td>
</tr>
<tr>
<td>4.1 Overview</td>
<td>7</td>
</tr>
<tr>
<td>5. Construction Programme</td>
<td>9</td>
</tr>
<tr>
<td>6. Socio-economics</td>
<td>10</td>
</tr>
<tr>
<td>7. Traffic and Transport</td>
<td>12</td>
</tr>
<tr>
<td>8. Noise and Vibration</td>
<td>13</td>
</tr>
<tr>
<td>9. Air Quality</td>
<td>13</td>
</tr>
<tr>
<td>10. Wind Microclimate</td>
<td>14</td>
</tr>
<tr>
<td>11. Daylight, Sunlight and Overshadowing</td>
<td>15</td>
</tr>
<tr>
<td>12. Archaeology</td>
<td>15</td>
</tr>
<tr>
<td>13. Ground Conditions</td>
<td>16</td>
</tr>
<tr>
<td>14. Water Resources, Drainage and Flood Risk</td>
<td>17</td>
</tr>
<tr>
<td>15. Townscape and Visual Impact Assessment</td>
<td>18</td>
</tr>
<tr>
<td>16. Cumulative Effect Assessment</td>
<td>18</td>
</tr>
<tr>
<td>16.1 Combined Effect of Individual Effects</td>
<td>18</td>
</tr>
<tr>
<td>16.2 Combined Effects of the Proposed Development with Other Development Schemes</td>
<td>19</td>
</tr>
<tr>
<td>17. Residual Effects and Conclusions</td>
<td>20</td>
</tr>
<tr>
<td>References</td>
<td>21</td>
</tr>
</tbody>
</table>
1. Introduction

1.1 The Planning Application

Moxon Street Residential (Luxembourg) Sàrl (hereafter referred to as the ‘Applicant’) is seeking to obtain full planning permission for the redevelopment of Moxon Street Car Park in Marylebone, London.

This document constitutes the Non-technical Summary (NTS) of the Environmental Statement (ES), which is submitted in support of the planning application.

The purpose of the NTS is to provide interested parties and the public with easy, non-technical access to the information contained within the ES.

A plan showing the location of the planning application site (hereafter referred to as the ‘site’) is provided in Figure 1.

1.2 Brief Description of the Site

The red line boundary for the site is shown in Figure 2. The site is located wholly within the administrative borough of the City of Westminster (CoW) and is approximately 0.34 hectares (ha) in size.

Figure 1: Site Location
The site is bound by Moxon Street to the north; Cramer Street to the east; St Vincent Street to the south; and Aybrook Street to the west. The site is located at National Grid Reference (NGR) 528271 181656.

The previous building on-site was demolished in 1966 and the site is currently occupied by a retail car park (comprising 109 spaces) and a Sunday farmers market, which has been in the ownership of Westminster City Council (WCC) since 1969.

The site lies wholly within the Portman Estate Conservation Area and is located adjacent to the Harley Street Conservation Area.

The site lies within Flood Zone 1, as defined by the Environment Agency’s (EA) indicative Flood Zone map. The site is therefore considered to be an area at low risk to flooding from fluvial and tidal events.

The site is well served by public transport with several London Underground stations located in the vicinity, including Regent's Park, Baker Street and Bond Street. The site is also well serviced by several bus routes within a short walking distance. The site has a Public Transport Accessibility Level (PTAL) of 6b, the highest possible level of accessibility to public transport.

1.3 Environmental Impact Assessment Methodology

URS Infrastructure and Environment Limited (URS) has been commissioned by the Applicant to undertake an Environmental Impact Assessment (EIA) in accordance with the relevant Regulations (Ref. 1). The results of this process are presented in the ES, and this document is the Non-technical summary of the ES.

‘Scoping’ forms one of the early stages of the EIA process and it is through Scoping that the WCC have been consulted on those environmental aspects that may be significantly impacted by the Proposed Development and should be included in the EIA.

A formal Scoping Report, outlining the proposed assessment for all aspects of the EIA, was first submitted to the CoW on the 4th August 2014. As part of the Scoping process, the CoW confirmed the scope of the EIA which included the following topic areas:

- Socio-economics;
- Traffic and Transport;
- Air Quality;
- Noise and Vibration;
- Wind Microclimate;
- Daylight, Sunlight and Overshadowing;
- Archaeology;
- Ground Conditions;
- Water Resources, Drainage and Flood Risk; and
- Townscape, Heritage and Visual Impact Assessment.

The EIA process has included the identification and assessment of all likely significant effects to sensitive receptors resulting from the construction works, and once the Proposed Development is complete and occupied. Potentially sensitive receptors that have been assessed through the EIA include:

- Adjacent residential properties / Proposed Development residents and users;
- Neighbouring retail properties and local businesses;
- Underlying geology and hydrogeology;
- Water resources and other utilities and infrastructure;
- Construction site workers;
- Archaeology / Buried heritage assets;
- Local amenity areas and public realm;
- Views, Conservations Areas and listed buildings; and
- Local highway, public transport, pedestrian and cycle networks.

The sensitivity, importance or value of the affected resource or ‘receptor’ (such as people or wildlife) and the actual change taking place to the environment (i.e. the ‘magnitude’ or severity of an impact) have been considered.
This ES has considered the likely significant effects of the Proposed Development on its neighbours, local environment, local and regional economy and the wider area. Beneficial and adverse, short and long-term (temporary and permanent), direct, indirect and cumulative impacts have been considered. Throughout the design process for the Proposed Development, the environmental specialists and the project design team have worked together through an iterative design process to reduce, or eliminate where possible, adverse environmental impacts through the evolution of the scheme design.

Where mitigation measures have been identified to eliminate, mitigate or reduce adverse impacts, where possible, these have been incorporated into the design of the Proposed Development. Following the incorporation of mitigation measures, the significance of any remaining residual impacts are defined by applying a standard set of significance criteria.

In order to provide a consistent approach to expressing the outcomes of the various studies undertaken as part of the EIA, and thereby enable comparison between impacts upon different environmental components, the following terminology has been used in the ES to define impacts:

- **Adverse** - detrimental or negative impacts to an environmental resource or receptor;
- **Negligible** - imperceptible impacts to an environmental resource or receptor; and
- **Beneficial** - advantageous or positive impact to an environmental resource or receptor.

Where adverse or beneficial impacts have been identified these have been assessed against the following scale:

- **Minor** - slight, very short or highly localised impact of no significant consequence;
- **Moderate** - limited impact (by extent, duration or magnitude) which may be considered significant; and
- **Major** - considerable impact (by extent, duration or magnitude) of more than local significance or in breach of recognised acceptability, legislation, policy or standards.

Where possible, impacts have also been assigned a geographic scale; for example, Local, District, Regional or National.

### 1.4 Environmental Statement Documentation

The Environmental Statement comprises:

- **Volume I: Main Document** - This presents the findings of the EIA and is divided into a number of background and technical chapters supported with figures and tabular information for clarity of reading;


- **Volume III: Technical Appendices** - The Technical Appendices provide additional detail on the assessments undertaken and information used to inform Volume I; and

- **Non-Technical Summary (NTS)**: This document - which provides a summary of the Proposed Development and the findings (residual impacts) of the ES using non-technical language.

### 1.5 Project Team

This ES NTS has been compiled by URS and presents the results of the EIA carried out by URS and a number of technical specialists, consultants and designers appointed by the Applicant. This team is presented in Table 1, along with their respective disciplines and contribution to the EIA.

<table>
<thead>
<tr>
<th>Table 1: Team Roles and Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Organisation</strong></td>
</tr>
<tr>
<td>Moxon Street Residential (Luxembourg) Sàrl</td>
</tr>
<tr>
<td>Simon Bowden Architects</td>
</tr>
<tr>
<td>DP9 Ltd</td>
</tr>
<tr>
<td>URS Infrastructure &amp; Environment UK Ltd (URS)</td>
</tr>
<tr>
<td>Hurley Palmer Flatt (HPF)</td>
</tr>
<tr>
<td>Alan Baxter Associates</td>
</tr>
<tr>
<td>Robert Tavernor Consultancy</td>
</tr>
<tr>
<td>AVR London Preparation of Verified Images.</td>
</tr>
<tr>
<td>Gordon Ingram Associates (GIA)</td>
</tr>
<tr>
<td>RWDI</td>
</tr>
<tr>
<td>Museum of London Archaeology (MoLA)</td>
</tr>
</tbody>
</table>

### 2. Public Consultation and Planning Policy

#### 2.1 Statutory consultation

In addition to the consultation carried out as part of the Scoping exercise, the EIA process has included a programme of ongoing consultation. Views of the Local Planning Authorities (WCC); statutory authorities; other organisations; community groups; and members of the public serve to help the development of the scheme; focus
the studies within the ES; and identify any issues which require further investigation and mitigation.

Key authorities and bodies involved in the evolution of the Proposed Developments design and assessment of environmental impacts include:

- WCC
- The Greater London Authority (GLA);
- English Heritage (EH);
- Environment Agency (EA);
- Thames Water;
- Transport for London (TfL);
- Network Rail;
- Greenspace Information for Greater London (GiGL);
- Local community/ stakeholders; and
- Local Councillors.

### 2.2 Public Consultation

The process of consultation is critical to the development of a comprehensive and balanced ES. Views of key statutory and non-statutory consultees serve to focus the environmental studies and to identify specific issues, which require further investigation. Consultation is also an ongoing process, which enables mitigation measures to be incorporated into the project design, thereby limiting adverse effects and enhancing benefits.

Key consultees involved in the evolution of the design and preliminary assessment of environmental effects include:

- WCC;
- Natural England (NE);
- Environment Agency (EA);
- Transport for London (TfL); and
- Thames Water Utilities Limited (TWUL).

In addition, extensive consultation with the local community has been undertaken as part of the pre-application process, as outlined in Table 2.

#### Table 2 Proposed Development Consultation

<table>
<thead>
<tr>
<th>Date</th>
<th>Stakeholder Activity</th>
<th>Attendees</th>
</tr>
</thead>
<tbody>
<tr>
<td>26 June 2014</td>
<td>A meeting with the Cabinet Member for the Built Environment</td>
<td>Cllr Robert Davis, DL Robert Ayton</td>
</tr>
<tr>
<td>30 June 2014</td>
<td>A meeting with the Marylebone Association</td>
<td>Neil Wilson, Simon Allford, Luke Tozer</td>
</tr>
<tr>
<td>08 July 2014</td>
<td>A meeting with a Marylebone High Street ward councillor</td>
<td>Councillor Iain Bott</td>
</tr>
<tr>
<td>18 July 2014</td>
<td>A meeting with a Marylebone High Street ward councillor</td>
<td>Councillor Karen Scarborough</td>
</tr>
<tr>
<td>02 July 2014</td>
<td>Letters sent to approximately 796 local residents and businesses, providing an invitation to a public consultation exhibition</td>
<td>-</td>
</tr>
<tr>
<td>16-22 July 2014</td>
<td>A public consultation exhibition</td>
<td>-</td>
</tr>
</tbody>
</table>

A Statement of Community Involvement, which provides a description and account of the consultation undertaken by the Applicant with key stakeholders, has been submitted in support of this Application.

### 2.3 Planning Policy Context

The Proposed Development has been assessed against relevant national, regional and local planning policies, as well as other material considerations. Planning policy has been considered in each technical chapter of the ES as appropriate for the consideration of environmental impacts.

The EIA has been undertaken with reference to the National Planning Policy Framework (NPPF) (Ref. 7). The NPPF was adopted on the 27th March 2012. The NPPF is part of the Government’s reforms to make the planning system less complex and more accessible to communities and local authorities. The NPPF replaces existing national planning policy guidance and statements, with the exception of Planning Policy 10: Planning for Sustainable Waste Management (Ref. 3), with a single more concise document.

The NPPF is accompanied by Technical Guidance to the National Planning Policy Framework, known as National Planning Practice Guidance (NPPG) (Ref. 4). The NPPG was launched on the 6th March 2014 and provides a web-based resource in support of the NPPF. Following public consultation on a ‘beta’ version ending on 9th October 2013, the NPPG was launched.

In addition to legislation and relevant guidance, the ES also considers both regional planning policy (The London Plan (Ref. 5) as well as Revised Early Minor Alterations (Ref. 6) and draft Further Amendments (Ref. 7)) and local planning policy, including (but not limited to):

- Westminster Unitary Development Plan Saved Policies (2010) (Ref. 9);
- Westminster City Plan: Strategic Policies (2013) (Ref. 8); and

### 3. Alternatives and Design Evolution

Under the EIA Regulations, an ES is required to provide:

"an outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for his choice, taking into account the environmental effects".
The alternatives analysis is a key part of the EIA process and serves to ensure that environmental considerations are built into the project design at the earliest possible stage.

In accordance with the above requirement of the EIA Regulations, those alternatives to the redevelopment proposals which have been considered by the applicant include:

- The ‘No Development’ Alternative;
- ‘Alternative Sites’; and
- Alternative Designs.

### 3.1 No Development

The ‘No Development’ alternative refers to the option of leaving the site in its current state. This would mean that the site will remain as a public car park. The ‘No Development’ alternative would result in the following missed opportunities:

- Underutilisation of the current site;
- Maintain the site which has been outlined as having a ‘negative impact’ on the area by the Portman Estate Conservation Report;
- Loss of opportunity to deliver new high quality residential dwellings in the locality; and
- Loss of opportunity to enhance the character of the four neighbouring streets by introducing active retail and community uses.

This option was rejected by the Applicant.

### 3.2 Alternative Sites

The site is appropriate for mixed-used development, and the development proposal has been designed as a direct response to the specific site’s potential and no alternative sites were considered for the Proposed Development.

### 3.3 Alternatives Designs and Evolution of the Proposed Development

The design has been developed through a series of key stages since the competition bid scheme was submitted in May 2013. This evolution has been based on a number of key considerations and constraints, as outlined in ES Chapter 3: Alternatives and Design Evolution, as well as following the key objectives for each design iteration:

- Financially viable for client;
- Creating an active and positive impact on four streets;
- Proposal to be well integrated into the surrounding Marylebone context; and
- Create an architecture that provides an appropriate high quality setting for each of the land uses.

The design has also evolved through extensive consultation with WCC at each stage, as well as public consultation.

Four of the key design iterations are shown below.

**Scheme 1 – Competition Bid Scheme**

The original proposal for the site was designed to allow maximum flexibility in order to respond to consultations from the Council’s Housing Department, in particular allowing smaller units if this was considered to be desirable.

**Figure 3 Competition Bid Scheme**

The scheme established the quantum of development to be submitted, including:

- Residential upper floors with on-site affordable housing;
- Retail to be at ground and lower ground; and
- Two levels of basement, including one level of public car parking.

This proposal faced Aybrook Street which meant that the proposal had a front and a rear. The design also located the Farmers’ market outside.

**Scheme 2 – 2013 Consultation**

Following discussions with WCC, the scheme was redesigned to include the following opportunities:

- An opportunity to upgrade Cramer Street;
- An opportunity to activate frontages on all four sides, turning the proposal into a 360 degrees development; and
- The ground floor was re-planned with smaller retail units and with the car park relocated to Aybrook Street.

**Figure 4 Christmas 2013 Scheme**

**Scheme 3 – Grid Scheme (Mirror Site 1)**

Further discussions with WCC, refined the design by including the following design changes:
• Refinement of bulk and mass in further detail in relation to Daylight and Sunlight;
• Three facades pulled in by 1m to historic building line;
• Internal workings of apartments developed;
• Retail strategy refined;
• Energy story developed (courtyard); and
• Marylebone Hall introduced.

Figure 5 Grid Scheme

Scheme 4 – The Proposed Development
The Proposed Development is outlined in the following section.

4. The Proposed Development
4.1 Overview

The proposal is for the development of an entire city block, and comprises 54 private apartments and 25 affordable apartments over 6 upper floors (Figure 6 and 7). The site is rectangular in plan running north-south, and is 100m long and approximately 33m wide. Retail and community uses are situated on ground and lower ground floors, with two levels of car parking in the basement. Key aspects of the scheme include:

• Three principal residential floors, with two further floors set back. These are separated into private apartments and affordable apartments, with the affordable provision located at the southern end of the site;
• A mix of retail and community uses at ground and lower ground level;
• A new community hall (Marylebone Hall) at the southeastern corner of the site. This is a flexible curated space, which will be also be used on Sundays by the Farmers’ Market, which has been retained on site;
• The retained public car park at Basement 1 level.
• A private car park located at Basement 2 level;
• A mechanical plant room at Basement 2 level, with chiller compound on roof;
• Cycle storage in dedicated room across the lower floors; and
• Green terraces and a biomass roof, with an allocation of PV.

The area schedule and unit mix for the site is shown below in Table 3 and Table 4, respectively.

Table 3: Floor space Allocation for the Proposed Development

<table>
<thead>
<tr>
<th>Use</th>
<th>Gross Internal Area (GIA) (m²)</th>
<th>Gross External Area (GEA) (m²)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Retail (A1 - A5)</td>
<td>4,028</td>
<td>4,270</td>
</tr>
<tr>
<td>Residential (Private Housing)</td>
<td>8,722</td>
<td>9,300</td>
</tr>
<tr>
<td>Residential (Affordable Housing)</td>
<td>3,254</td>
<td>3,411</td>
</tr>
<tr>
<td>Community Use</td>
<td>688</td>
<td>787</td>
</tr>
<tr>
<td>Marylebone Hall (Publically Accessible Amenity)</td>
<td>334</td>
<td>348</td>
</tr>
<tr>
<td>Car parking</td>
<td>5,884</td>
<td>6,286</td>
</tr>
<tr>
<td>Plant / Ancillary</td>
<td>2,261</td>
<td>2,063</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>25,171</strong></td>
<td><strong>26,465</strong></td>
</tr>
</tbody>
</table>

Table 4: Accommodation Schedule

<table>
<thead>
<tr>
<th>No. of Bedrooms</th>
<th>Private</th>
<th>Affordable</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Bedroom</td>
<td>6</td>
<td>8</td>
</tr>
<tr>
<td>2 Bedroom</td>
<td>27</td>
<td>10</td>
</tr>
<tr>
<td>3 Bedroom</td>
<td>21</td>
<td>7</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>54</strong></td>
<td><strong>25</strong></td>
</tr>
</tbody>
</table>

Figure 6 The Proposed Development
Residential

The upper levels of the Proposed Development are composed as two buildings – one for affordable residential apartments and one for private residential apartments, each with their own entrance and core.

Figure 8 Typical Residential Floor Plan

Affordable residential is accessed from the southern core, with an entrance off Aybrook Street, whilst the private residential is accessed from the northern core, with an entrance also off Aybrook Street.

Private apartments are arranged around a central courtyard that serves as an amenity for the residents.

On the typical residential floors the private residents enter their floor via the north core, and access their apartment via a sky bridge running along the central axis of the courtyard. The majority of apartments on the typical floors are 2-bed. All apartments have external balconies.

Affordable residents would enter their floor via the south core. Apartments are accessed from a central corridor space with integrated storage facilities. All apartments have single glazed winter gardens.

On the fourth and fifth floors, terraces are introduced as the building steps back. All rooms facing the terrace have sliding doors. The terraces are to be green roofs to allow for planting, with islands of paving at all entrance doors.
Retail
A mix of retail and community uses activate all four streets. Retail units and restaurants take up most of the frontages along Aybrook Street, Moxon Street and Cramer Street, with community provision at the southern end of the site.

A key design factor is to enhance the retail offer of the area by introducing retail units into the Proposed Development to encouraging pedestrian traffic from Marylebone High Street onto the neighbouring streets, adding value to the shop fronts along the facades, as well as to the new Marylebone Hall. Each retail unit has a maximum total floor area of 500m².

Community Uses and Marylebone Hall
Community Use
A Needs Based Assessment has established that a local GP surgery and community hall will meet an identified need. The entrance to the community space is located centrally along the St Vincent Street façade, with the majority of the allocation at lower ground. Pavement roof lights along the perimeter of the development allow natural daylight to penetrate down into the space.

Marylebone Hall
Marylebone Hall is located at the corner of Cramer Street and St Vincent Street. This will provide a home for the Farmers' Market, which currently uses the existing car park every Sunday for four hours. During the rest of the week this space will be a flexible curated space for other uses, including a community hall, children’s play space, crèche and an education use linking with the St Vincent’s RC Primary School opposite.

Play Space
Approximately 200m² of play space will be provided for the affordable residential units at lower ground floor.

Figure 9 Marylebone Hall

Basement
The Proposed Development houses two levels of basement, including the retention of the existing surface public car park on site. This comprises 168 parking spaces (including 68 private and 95 public spaces) and is located at Basement 1 level. It is accessible via a ramp off Aybrook Street.

Public cycle parking will be provided at Basement 1 level in a secure enclosure, and will be accessible via the car parking ramp.

Residential parking at Basement 2, accessible via a secure shutter at the head of the ramp leading up to Basement 1 level. This comprises 71 car parking spaces, including 54 for the private residential apartments (of which 6 are disabled), 10 for the affordable residential apartments (of which 3 are disabled spaces), and 7 for disabled staff working in the retail and community units above.

Private residential and retail cycle parking will be provided at Basement 2 level in a secure enclosure. It will be accessible via a goods lift from street level, as well as via the car park ramp.

Affordable residential cycle parking will be provided in a dedicated store at lower ground level, accessible via the affordable residential lifts at the south core.

On market days, a section of the public car park at Basement 1 level will be allocated to the market traders’ vehicles, who will use the same lift to transport their goods to the Market Hall to set up.

Figure 10 Basement Plans

5. Construction Programme

The indicative construction programme for the planning application is shown in Table 5 and Figure 11. Given the scale of the Proposed Development, the current
expectation is that the construction works would take approximately 24 months, commencing in August 2015.

The CEMP will apply to all contractors, sub-contractors, trade and site management. The CEMP will place obligations on contractors to adopt best environmental practice, such as careful programming, resource conservation, adhering to health and safety regulations and quality procedures. The CEMP will include detailed working procedures for the control of emissions and environmental risk, and will also confirm working hours and locations. The CEMP will include measures for, amongst others:

- Neighbour and public relations, and provisions for complaints;
- Site hoarding, housekeeping and security;
- Traffic management and site access;
- Operations likely to result in a disturbance;
- Waste management and working site housekeeping;
- Noise and vibration, air quality and water control;
- Protection of ecology and vermin control;
- Electricity and lighting; and
- Any requirements for monitoring and record keeping.

Particular consideration will be taken to the neighbouring St. Vincent's Primary School and temporary market in Aybrook Street. The site entrance/exit will be positioned away from the school and pupil leaving times will be respected. The site hoarding line will also not impact on the temporary market operation.

The Principal Contractor will demonstrate through the CEMP the management, monitoring, auditing and training procedures that will be in place to ensure compliance. The CEMP will also set out the specific roles and responsibilities of the contractor’s personnel in managing, monitoring and controlling all sub-contractors.

Particular consideration will be given to ensuring that disturbance to local residents and St Vincent Primary School is minimised.

### 6. Socio-economics

Chapter 06: Socio-Economics of the ES provides an assessment of the social impacts (housing provision, education, healthcare, playspace and open space) and economic impacts (employment and local spending) of the Proposed Development. The Proposed Development is assessed against the existing socio-economic baseline conditions at the site and surrounding area and, where relevant, at a Borough (City of Westminster (CoW)) and
region (Greater London) level. Baseline socio-economic conditions have been established by drawing on nationally recognised data and research including (but not limited to) Census 2011, Office for National Statistics (ONS) employment data, and statistics released by the Department for Education and Department for Health.

**Construction**

The construction phase of the Proposed Development is expected to generate construction employment, amounting to an average of approximately 250 gross direct employees on-site per year. There will also be additional employment generated indirectly through the construction supply chain, resulting in total net construction employment of an estimated 318 employees, with the majority of these being people from the Greater London region. The construction phase of the Proposed Development will therefore have an overall minor beneficial, long-term temporary effect on construction employment.

**Completed Development**

**Employment**

The Proposed Development is estimated to generate 311 Full Time Equivalent (FTE) jobs from retail floorspace, of which the majority of jobs (271) are from the Greater London area. This will result in a minor beneficial, long term permanent impact on the Greater London economy.

**Additional Local Spend**

To estimate the benefit of the Proposed Development in terms of local spending from residents, ONS average weekly spending figures for residents in Greater London have been applied to the accommodation schedule. Annual gross expenditure per person has been calculated as £12,541. Applying average expenditure figures (accounting for leakage) to the estimated 138 residents of the Proposed Development results in a total economic benefit of approximately £2.4 million per annum. The collective residual impact of additional spending expected to be generated by the new residents of the Proposed Development is considered to have a minor beneficial, long term permanent impact on the Greater London economy.

**Housing**

The Proposed Development will deliver 79 residential units at the Proposed Development resulting in a minor beneficial, long term permanent impact on meeting the targets for new housing provision in the CoW.

The Proposed Development will provide 25 affordable residential units (amounting to 32% affordable housing, measured by habitable room). Once the Proposed Development is complete, the 25 affordable units, will result in a minor beneficial, long term permanent impact on new affordable housing in the CoW.

**Education**

The education baseline identifies that there is surplus capacity to accommodate the increased demand being placed on the local area for primary and secondary school education resulting in negligible effect.

**Healthcare**

The baseline figures for the CoW suggest there are on average 1,836 patients per GP. The seven GP surgeries in the CoW that lie within 1km of the Proposed Development contain a total of 26 GPs and new patients are currently being accepted at these facilities. The surgeries have an average patient list size of 1,568 patients per GP.

The additional 138 residents anticipated to live at the Proposed Development would place demands on the local health facilities. The additional residents would increase the overall practice list size to 1,573 patients per GP, which would mean a greater level of service than the target for England of 1,800 patients per GP would still be provided locally once the new demand is accounted for.

As such, the Proposed Development is considered to have a negligible, long-term effect on healthcare provision.

**Open Space**

It has been calculated that the Proposed Development would accommodate an additional 138 residents, and 231 gross operational workers. They will place demand on open space within the immediate area.

The Proposed Development would provide 626m² of privately accessible amenity space. This will help mitigate any impact the new population may have on public space and provide accessible space for residents within the Proposed Development. However, the Proposed Development does not provide any additional public open amenity space for the 231 additional gross operational workers.

Based on this level of provision, it is judged that the Proposed Development is considered to have a negligible, long term effect on open space provision.

**Children’s Playspace**

The GLA’s SPG recommends that 10m² of play and recreation space be provided for children and young people in new developments. Applying the GLA’s SPG guidance, there is a requirement for 150m² of play space to serve the 15 children estimated to reside within the Proposed Development.

The Proposed Development will provide 200m² of play space for the children residing at the affordable units.

However, the Paddington Street Garden is also located within 100m of the site, making it appropriate for children under 5 years old. In addition, play areas at Marylebone Green Playground and The Regent’s Park Tennis Centre can also be made of use by older children residing within the Proposed Development.
On the basis of the additional demand for play space generated, and the spaces available within the immediate area to meet this demand, it is considered that the Proposed Development would have a negligible, long term effect on play space.

7. Traffic and Transport

Chapter 7: Traffic and Transport of the ES presents an assessment of the effect of the Proposed Development on the surrounding road network and public transport facilities. This chapter is supported by a Transport Assessment and Travel Plan which can be found in ES Volume III: Appendix D.

The EIA has identified the expected number of person trips, by mode, which will be generated by the Proposed Development. In doing so, a full assessment of the effect of the Proposed Development on pedestrian movements, cycle infrastructure, public transport and the surrounding road network has been undertaken.

Construction

It is intended that the construction traffic routes to and from the site would be agreed with WCC and TfL prior to any construction activity commencing. A CMP will also be prepared to include a number of mitigation measures to manage the traffic during construction.

Effect on Road Users

Following implementation of measures within the CMP (such as scheduling and consolidating deliveries) the likely increase in additional vehicle trips and Heavy Goods Vehicle (HGV) trips on the local road network during the construction works in comparison to the existing traffic flows will result in a negligible effect, particularly on the wider local highway network as likely congestion on highways surrounding the site will be minimised.

However, it is anticipated that there will be a temporary minor adverse residual effect on road users in the immediate vicinity of the site which is not significant.

Effect on Pedestrians and Cyclists

As a result of the increased number of HGV turning movements in the immediate vicinity of the site, it is considered that there would be a temporary minor adverse effect on pedestrians and cyclists and a negligible effect on pedestrians and cyclists on the wider local highway network.

Effect on Public Transport Users

It is assumed that construction workers would access the site by public transport; however there would not be any noticeable change in numbers of trips on the public transport infrastructure as a result and as such there would be a negligible effect on public transport users during construction.

Completed Development

A Travel Plan for the residential units and a Framework Travel Plan for the retail floor space has also been prepared as part of this Application. These documents set out the broad principles to be adopted to promote sustainable travel and, in particular, active modes for day to day travel. Given the nature of the site, the implementation of the Travel Plans is unlikely to result in a significant reduction in the number of vehicular movements associated with the Proposed Development, although it will contribute to a slight reduction.

Effect on Road Users

There is only likely to be a small increase in vehicle trips associated with the Proposed Development in comparison to existing conditions, and as such it is considered that there would be a negligible effect on road uses on both the local and the wider highway network.

Effect on Vehicular Deliveries and Servicing

To ensure that servicing activity is carried out efficiently and any adverse effect on the adjacent highway network is minimal, a Delivery Servicing Management Plan (DSMP) will be implemented for each of the land uses within the Proposed Development which would include measures for refuse storage and collection and that potential vehicle / pedestrian conflicts are avoided.

The number of servicing trips estimated to be generated from the Proposed Development is very small, at 19 trips per day, in comparison to existing traffic levels on roads surrounding the site. With the provision of servicing / loading bays and implementation of the DSMP, servicing and deliveries are not considered to result in material disruption to the operation of the highway network on or surrounding the site. The effect is, therefore, considered to be negligible.

Effect on Pedestrians and Cyclists

Whilst there would be an increase in the number of person trips to the Proposed Development, the effect on pedestrians and cyclists on the local and wider transportation network is considered to be negligible as a result of implementation of the Travel Plans encouraging more active modes of travel and through the provision of parking for a total of 205 cycles, comprising 160 spaces for the residential units, and 45 spaces for the retail and community land uses. Additionally, improvements to pedestrian space within the site would also encourage travel by sustainable and in particular active modes.

Effect on Public Transport Users

The site is well-connected to public transport with Baker Street and Bond Street London Underground stations both within 600m and bus stops in the vicinity. The site has
been given the highest rating in terms of public transport accessibility of 6a which is classed as ‘excellent’.

There would be an increased number of person trips by public transport which would be distributed throughout the day with the majority occurring during in the morning and evening peak periods with an estimated 3 to 4 additional two-way movements by bus and 20 additional two-way movements by rail / London Underground per hour at these peak periods, with lesser increases at other times. As such, it is considered that there would be a negligible effect on public transport users as a result of the Proposed Development.

8. Noise and Vibration

Chapter 8: Noise and Vibration of the ES presents an assessment of the likely significant effects of the Proposed Development with respect to noise and vibration in terms of:

- Predicted noise and vibration levels from the construction works;
- Noise from building services plant associated with the Proposed Development during operation; and
- Any increases to road traffic attributed to the Proposed Development.

A baseline noise survey was undertaken to establish noise levels at selected locations around the site. It was noted during the baseline survey that the noise environment is dominated by road traffic on the surrounding road network.

Construction

The assessment indicates that noise effects at sensitive receptors due to construction activities are predicted to range from temporary, medium term minor adverse to major adverse significance before mitigation is implemented. It should be noted that construction noise predictions are based on a worst case scenario where, over the course of a working day, all plant is operational at all areas of all worksites. In reality, it is likely that the worst case noise levels predicted will only occur for limited periods of time and will be temporary and transient in nature.

Based on sample vibration levels from various piling techniques, vibration effects that may cause disturbance at nearby sensitive receptors are considered to be temporary, medium term minor adverse for the majority of the construction period however for limited periods of time this may be of moderate adverse significance pre-mitigation, depending upon the type of piling method used.

Noise and vibration will be managed to reduce impacts, and mitigation measures will be documented within a Construction Method Statement (CMS) and a Construction Environmental Management Plan (CEMP). Measures that will be adopted to minimise construction noise effects include:

- Noisy plant or equipment shall be situated as far as possible from noise sensitive buildings; and
- Barriers (e.g. site huts, acoustic sheds or partitions) will be used to reduce noise reaching noise sensitive buildings.

Following the incorporation of mitigation measures, the residual construction noise and vibration effect is assessed as being predominantly negligible to moderate adverse and therefore not significant at nearby sensitive receptors. Significant construction noise effects will occur for limited periods of time when high noise generating items of plant are operating in close proximity to sensitive receptors. These periods will be kept as short as practicable.

The effect of noise from construction traffic at sensitive receptors is expected to range from negligible to minor adverse and is therefore not significant.

In order to reduce the perception of effects of construction traffic noise, a number of measures will be implemented. For example, all traffic entering and leaving the worksite will be closely controlled and where possible, vehicles will be fitted with exhaust silencers.

Completed Development

During the operation of the Proposed Development, it is predicted that operational traffic noise will generate at worst, an increase in noise levels of approximately 0.4 decibels (dB) (along Moxon Street). Operational traffic noise along all roads surrounding the Proposed Development is therefore assessed as being negligible.

A rooftop plant is proposed for the operational development which will be located in a louvered enclosure. As no detailed information on plant is available at this stage of the assessment, it is assumed that a design criterion has been derived so that noise from fixed plant should not exceed the derived noise criterion at nearby noise sensitive receptors and therefore the effects are assessed as negligible and therefore not significant.

Internal noise levels stated in British Standard (BS) 8233 are to be achieved for new residential units within the Proposed Development. Consequently, noise predictions have been used to derive glazing requirements which will achieve the required noise level internal to the proposed residential units as prescribed by BS 8233. It is considered that through the use of appropriate design measures such as glazing specifications and façade insulation design, ambient noise affecting the proposed residential areas will be controlled such that the site is suitable for the proposed use.

9. Air Quality

Chapter 9: Air Quality of the ES provides an assessment of the effect on air quality that would occur as a result of the
construction and operation of the Proposed Development in terms of traffic generation and energy centre emissions generation.

The Borough has been declared an Air Quality Management Area (AQMA), due to exceedances of the national air quality objective values for annual mean nitrogen dioxide (NO$_2$), particulate matter (PM$_{10}$) and daily mean PM$_{10}$.

**Construction**

In general, construction activities have the potential to generate airborne dust and particulate matter. For the Proposed Development, the concentrations of any airborne particulate matter generated by these activities would be controlled using on-site management practices to the extent that the Proposed Development should give rise to negligible effects on dust deposition rates at the nearest sensitive receptors and is therefore considered to be not significant with respect to potential effects on health and amenity.

Construction plant emissions have not been explicitly modelled in this assessment, as these are considered to be a small, insignificant and temporary emission source relative to ambient conditions. However, suitable mitigation measures for site plant will be presented in the CEMP and within the CMS in order to reduce any potential effects.

**Completed Development**

Predictions of NO$_2$ concentrations at existing receptors in the vicinity of the site and local road network have shown that there would be small to imperceptible changes in pollutant concentrations between the ‘Without Development’ and ‘With Development’ scenarios, in an area where the national air quality objective is being exceeded.

The effect of the additional emissions from road sources and the proposed energy plant during operation of the Proposed Development to sensitive receptors is therefore considered to be negligible to minor adverse. With the implementation of mitigation measures this is expected to be negligible overall.

The site is also considered to be suitable for residential use, given that receptors will not be exposed to concentrations that are greater than that experienced by existing receptors and through mitigation measures such as controlled ventilation. The residual effect is therefore considered to be negligible.

Additionally, the Proposed Development is also considered to be air quality neutral as the operational traffic and plant emissions are anticipated to be lower than the benchmarked rates for both NOx and PM$_{10}$.

**10. Wind Microclimate**

Chapter 10: Wind Microclimate of the ES provides an assessment of wind conditions at the site. A Desk Based Assessment was conducted for the Proposed Development and the nearby existing surrounding buildings in order to assess the potential wind microclimate effects on the Proposed Development.

The existing wind conditions at the site are relatively calm. The majority of the existing site would be expected to be suitable for sitting or standing during the windiest season and some locations closer to existing buildings in the surrounds may be suitable for standing or leisure walking, as winds are channelled between these buildings.

**Construction**

As the existing site is a cleared area, an increase in the local windiness as a result of demolition is not anticipated, and neighbouring buildings to the site are unlikely to experience additional exposure to prevailing south westerly or secondary north easterly winds once the site has been cleared. Any localised increases in wind speeds are unlikely to create conditions unsuitable for a working construction site or for use of the immediately surrounding areas as pedestrian thoroughfares. Therefore the potential effect is expected to be negligible at worst.

**Completed Development**

The majority of the Proposed Development is expected to experience a wind microclimate that is suitable for the desired pedestrian use of the site. Conditions across the site are expected to range from minor adverse to moderate beneficial.

Entrances throughout the Proposed Development are expected to be usable throughout the year and are suitable for either sitting or standing during the windiest season, representing negligible to minor beneficial.

The wind microclimate on thoroughfares around the Proposed Development is expected to be largely suitable for standing use during the windiest season representing a minor beneficial effect. However, at the south eastern corner of Proposed Development, winds from a south westerly direction would be expected to generate leisure walking conditions representing a negligible effect.

Marylebone Hall has the facility to have an entirely open or closed façade and therefore wind conditions were considered for both scenarios. With Marylebone Hall in the closed position, it effectively becomes an internal space and is therefore unaffected by the wind microclimate. Entrances would ideally be located along the eastern façade, as far to the north as is practical where sitting and standing conditions are expected which would represent minor beneficial and negligible effects respectively.
With Marylebone Hall in the open position, the wind microclimate generates leisure walking conditions which would represent a minor adverse (insignificant) effect in relation to the anticipated standing conditions, however on the windiest days of the year (typically during winter), this area may have to be partially closed in order to divert these winds rather than allow penetration into this space and would reduce the effect to negligible.

Balconies and terraces for the most part are expected to generate negligible effects; however there are locations where the conditions are windier than desired and represent a minor adverse effect. For these locations, mitigation measures such as additional partitioning, exchanging porous balustrades for solid balustrades and the addition of planters and/or hard landscaping elements would provide beneficial shelter and reduce the effects to negligible.

11. Daylight, Sunlight and Overshadowing

Chapter 11: Daylight, Sunlight and Overshadowing of the ES presents an assessment of the Proposed Development’s potential effect on daylight and sunlight availability to surrounding neighbouring properties and overshadowing. The technical analysis has been undertaken in accordance with the Building Research Establishment (BRE) 2011 Guidelines.

The properties surrounding the development site that appear to be in residential use and therefore are considered likely to be affected by the Proposed Development are as follows:

- Howard House;
- 1-8 Moxon House;
- Osborne House;
- 4-10 Moxon Street (even);
- 5 Moxon Street;
- Units above Waitrose;
- 4 Cramer House;
- 2 Cramer Street;
- 1-12 Bourne House;
- Faraday House;
- 38 Aye Brook Street; and
- 33-35 Aye Brook Street.

The properties listed above have been assessed in regards to daylight and sunlight (where applicable). Based on the percentage alterations alone the results indicate some significant alterations to several of the surrounding properties. However, the site is unusually cleared compared to the surrounding context for such a dense urban environment and has been identified by the local authority for development in a supplementary planning document. In such circumstances the BRE provide that adverse impacts are unavoidable and alternative criteria may be adopted by considering a mirror massing.

Therefore based on professional judgement, in consideration of the unusual baseline condition, comparison to the mirror massing and retained levels of daylight out of the 12 properties assessed the effects of the Proposed Development in terms of daylight are as follows:

- 1 property will experience a negligible effect;
- 4 properties will experience a minor adverse effect;
- 4 properties will experience a minor to moderate adverse effect;
- 2 properties will experience a moderate adverse effect; and
- 1 property will experience a moderate to major adverse effect.

In terms of sunlight, out of the 11 properties required for assessment the effects are as follows:

- 5 properties will experience a negligible effect;
- 2 properties will experience a minor adverse effect;
- 1 property will experience a minor to moderate adverse effect; and
- 3 properties will experience moderate adverse effects.

There are no areas of amenity space located adjacent to the site and therefore a sun on ground assessment is not required. However, a transient overshadowing analysis has been undertaken to understand the impacts on the Paddington Street Gardens. The Effects are considered negligible.

A solar glare assessment is not considered necessary as the facades do not comprise of any large areas of glazing or reflective cladding and thus is unlikely the scheme would result in any significant impacts in terms of solar glare. A light pollution assessment is not necessary, as the Proposed Development is predominately residential and therefore it is unlikely there will be any significant effects in terms of light pollution.

12. Archaeology

Chapter 12: Archaeology of the ES assesses the potential effects on archaeology (buried heritage) arising from the construction of the Proposed Development.

The baseline information has been derived from a study of the buried heritage assets (archaeological remains: assets which are not currently visible and are intangible) within a 150m buffer around the site from archaeological literature
and standard published and documentary sources within Greater London. These comprise the Greater London Historic Environment Record (HER) and the London Archaeological Archive and Research Centre (LAARC).

There are no previous archaeological investigations from within the site; however surveys have been undertaken within the study area and have identified mostly post-medieval finds, the closest of which was part of the post-medieval extra-mural burial grounds for St Marylebone parish between 1770 –1854. Five brick burial vaults were defined and the remaining area was occupied by graves. Foundations and basements of mid-late 18th century terraced buildings and their associated ancillary buildings have also been identified in the vicinity.

The site has a high potential for palaeo-environmental remains, as the River Tyburn water course ran through this location. Whilst the exact course of the river at this point is uncertain, it is understood the southern part of the site lay within the floodplain, but it is possible that the alluvium extends further northwards than has been mapped by the British Geological Society (BGS).

The site does not contain any nationally designated (protected) heritage assets, such as scheduled monuments, listed buildings or registered parks and gardens, however the Site is located within the Portman Estate Conservation Area, is adjacent to the Harley Street Conservation Area and is immediately adjacent to the south side of the Marylebone Village Area of Special Archaeological Priority, designated as such by WCC due to evidence of a village at this location during Saxon and Medieval times, though in fact the Saxon and early medieval village was c 650m south-east of this, near the modern Bond Street London Underground station.

Although there is a known burial ground approximately 30m north-west of the site (now Paddington Street Gardens), there is no evidence that the burial ground, consecrated in 1733, ever extended beyond the footprint of the current Paddington Street Gardens.

**Construction**

Site clearance, including breaking out of the tarmac car park surface and excavation for foundations and basement levels of the Proposed Development would have an impact upon any surviving remains of the 18th century basements, including vaults which are currently upstanding adjacent to the eastern boundary of the site.

Piling carried out prior to basement excavation would remove any archaeological remains within the footprint of each pile. The severity of the impact would depend on the pile type, pile size and pile density although this is anticipated to be of a minor adverse effect and therefore not significant as this will not impact heritage assets which are of a high value.

Archeological monitoring of preliminary geotechnical investigations is expected to be followed, if necessary, by further archaeoological evaluation and a watching brief to form preservation by record which will reduce the effects on archaeological assets to negligible.

**Completed Development**

There are no impacts upon buried heritage assets and therefore no mitigation measures are required.

**13. Ground Conditions**

Chapter 13: Ground Conditions of the ES addresses the effects of the Proposed Development on ground conditions including geology, hydrogeology and ground contamination of the site and surrounding area. The assessment considers the effects during the construction and operational phases of the Proposed Development. The need for mitigation measures and any monitoring that may be required during the construction phase is also considered and, where appropriate, any residual effects are indicated.

Review of published geological maps indicates that the geology beneath the site is comprised of London Clay with Lambeth sands and clays, Thanet sand formation and subsequently Upper Chalk deposits below. Made Ground and Lynch Hill Gravels are known to be present above the London Clay under the site.

The London Clay is classified as Unproductive Strata (non water bearing) by the EA and the underlying Chalk as a Principal Aquifer (water bearing). The overlying thickness of London Clay is likely to minimise potential risk to the Principal Aquifer from on-site activities. The site has also been found to overlie a Secondary A Aquifer, associated with the underlying Lynch Hill Gravel, suitable for supporting water supplies at a local rather than strategic scale and in some cases forming an important source of base flow to rivers.

The nearest surface water feature to the site is the Regent’s Park boating lake which is located over 500m to the north of the site. The Paddington Basin is situated 1.2km east of the site. It is considered unlikely that these water features are in continuity with groundwater within the gravels beneath the site.

The site lies in an area which was bombed during the Second World War. Therefore there may be risk of discovering unexploded ordnance during any ground works.

**Construction**

During construction, precautions will be taken to minimise exposure of workers and the general public to potentially harmful substances. Potential effects to on-site workers are considered negligible if appropriate site safety procedures
are implemented and followed, and if necessary, appropriate personal protective equipment (PPE) is used.

There is the potential for contaminated dust, land contamination through fuels and other lubricants and waste (both hazardous and general) as a result of construction activities, however through mitigation measures to be set out in the CEMP, these effects will be reduced to negligible.

Ground contamination has the potential to be mobilised through construction activities which may allow current and historic sources of contamination to be exposed or ground gas and volatile soil vapours to be released for example, however ground investigations prior to commencement of works and other mitigation measures will ensure that any potential effects will be reduced to negligible.

The removal of the potentially contaminated soils associated with the preparatory ground works and foundation excavations of the Proposed Development will result in a negligible to moderate beneficial residual effect to the local environment as a result of removal and remediation works.

The Principal Chalk Aquifer is not considered to be at risk given the thickness of London Clay overlying it. Exact piling depths are not known at the time of writing, however given that the Proposed Development is only seven storeys above ground it is thought unlikely that piles would need to penetrate the London Clay which extends to over 40m bgl in this area.

There are no adverse residual effects, and therefore, no likely adverse significant environmental effects relating to ground conditions expected to occur throughout the construction of the Proposed Development, provided that good practice and mitigation measures are applied as discussed in this ES Chapter.

Completed Development
The residual effects associated with the completed and operational Proposed Development are anticipated to be negligible following mitigation measures such as adhering to statutory and best practice waste regulations. Therefore no significant effects to ground conditions are expected once the Proposed Development is completed and occupied.

14. Water Resources, Drainage and Flood Risk
Chapter 14: Water Resources, Drainage and Flood Risk of the ES has assessed the effect of the Proposed Development on the water environment through identification of the baseline water resources and features and an assessment of the likely sources, magnitudes and significance of any effect.

Through a review of the baseline conditions of key water resources the following features have been identified as key potential receptors:

- Shallow Groundwater – Secondary A Aquifer;
- Deep Groundwater – Principal Aquifer;
- Water Supply Network provided by Thames Water Utilities Ltd (TWUL); and
- Foul and Surface Water Drainage managed by TWUL.

As the surface water features, namely the River Thames, waterbodies in nearby Regent's Park and Hyde Park and the Paddington Basin are some distance from the site, these are not considered likely to be affected either during construction or as a result of the completed development.

The site lies within Flood Zone 1, which is classed as the zone of the lowest flood risk by the EA.

Construction
During construction there is potential to disturb groundwater through piling, excavations and other subsurface works. This could impact groundwater by causing pollution to the groundwaters or lowering groundwater level although through the implementation of mitigation measures, these potential effects will be reduced to negligible for both shallow and deep groundwater.

There is the potential for suspended sediments, leaks and spillages from fuels and oils, hazardous and general waste and particles from concrete and cement products to contaminate the groundwater and sewer network although effective management through measures set out in the CEMP will reduce these effects to negligible.

There is also a risk associated with the disturbance of existing on-site drainage systems and water supply network which could cause localised flooding, pressure issues and contamination. These utilities will be marked prior to construction and an emergency response plan prepared so that in the event of any leakages or spillages, these can be immediately contained.

An increase in water demand and waste water discharge during construction is unlikely to have an adverse effect on TWUL resources, however TWUL are considering whether there is existing wastewater capacity in the network. If TWUL determine that there is not capacity within the local sewer network or existing connections then it will be necessary to upgrade it prior to any works taking place and any effect will still remain negligible.

Although a number of potential effects to identified water resource receptors have been acknowledged throughout the construction phase, the application of standard environmental management controls throughout the construction works will eliminate the potential for adverse effects to water resources. No likely significant effects to
water resources have been identified throughout the construction phase. All effects identified are assessed as being negligible.

**Completed Development**

Although a number of potential effects to identified water resource receptors have been acknowledged once the Proposed Development is completed and operational such as contamination through leaks and spillages or through operational sources such as cars or plant on site; the application of standard environmental management controls and mitigation embedded into the design of the Proposed Development will eliminate the potential for adverse effects to water resources and as such, effects are considered to be negligible.

A moderate beneficial effect on local flood risk as a result of the proposed drainage strategy is anticipated through the reduction in surface water runoff rates by half from the existing site conditions and will lead to reduced pressure on the TWUL sewer network.

The Proposed Development is expected to increase the yearly water supply requirements for the retail space and permanent residents as well as increasing the volume of wastewater on the foul sewer network which has the potential to generate adverse effects on these services. TWUL will be undertaking assessments to determine the capacity of the local network in order to understand whether any upgrades to the local network are required.

Taking into account TWUL’s statutory responsibilities, TWUL’s strategy to achieve a surplus in capacity of the water supply network, upgrades to Beckton Sewerage Treatment Works (expected completion in December 2014) as well as the potential for Thames Tideway Tunnel to come forward, the overall residual effect of the Proposed Development will eliminate the potential for adverse effects to water resources and as such, effects are considered to be negligible.

**15. Townscape and Visual Impact Assessment**

A full assessment of the residual effects to local, regional and wider strategic views can be found within ES Volume II: Heritage, Townscape and Visual Impact Assessment. The assessment tests the visual impact of the Proposed Development and consists of a series of accurately prepared photomontage images or Accurate Visual Representations (AVR) which are designed to show the visibility and appearance of the Proposed Development from a range of publicly accessible locations around the site. Twelve local views were selected for the assessment in consultation with Westminster City Council (WCC).

The site is situated in the Portman Estate Conservation Area very close to its boundary with the Harley Street Conservation Area, which lies to the north and east. There are a large number of listed buildings in the surrounding area including the Roman Catholic Church of St James (Grade II*), 18-27 Manchester Street (Grade II), Fitzpatrick Family Mausoleum (Grade II), St. Marylebone Youth Centre Club (Grade II), Crofton house (Grade II) and 14 & 16 New Cavendish Street (Grade II). Local views of significance include views in all directions from the gardens to the east of the site, north and south of Paddington Street.

**Effects during the Construction Phase**

The most significant impacts due to construction activities will be the construction of the new development and associated infrastructure. Construction impacts associated with the Proposed Development are described in the Construction Method Statement (CMS) submitted as part of the planning application. The Principal Contractor appointed to the Proposed Development would devise a Deconstruction and Construction Method Statement (DCMS), through which mitigation and compliance with the City of Westminster’s (CoW) Code of Practice for Deconstruction and Construction Sites will be achieved.

**Effects Once the Proposed Development is Completed and Occupied**

The Proposed Development has been designed to enhance the settings of the two conservation areas and nearby Grade II* listed church of St. James. In summary, the impacts of the Proposed Development would be positive, ranging from moderate to major beneficial.

The Proposed Development will be of the highest design quality and has been designed to complement and enhance this specific site with well composed elevations and traditional materials that will add to the overall quality of the street. The Proposed Development will redevelop a site of no architectural merit and will result in a better proportioned and more elegant composition that will enhance the townscape locally.

**16. Cumulative Effect Assessment**

Cumulative effect interactions can occur as either interactions between effects associated with just one project or interactions between the effects of a number of projects in an area. As a result, two types of cumulative effect interactions have been considered:

- The combined effect of individual effects, for example noise, airborne dust or traffic impacts on a single receptor; and
- The combined effects of several development schemes which may, on an individual basis be insignificant but, cumulatively, have a significant effect

**16.1 Combined Effect of Individual Effects**

Chapter 15: Effect Interactions of the ES presents the combined effects of individual effects.
The identified residual effects (as set out within the individual technical chapters of ES Volume I) have been reviewed against receptors they affect. Where there is more than one effect on a particular receptor, the potential for effect interactions has been determined. If there is the potential for effect interactions, consideration is then given as to whether there is the potential for any resultant combined cumulative effect.

**Construction**

*Air Quality, Noise and Vibration, and Construction Traffic*

Individual effects that have the potential to interact are largely related to noise and vibration from the construction works, air quality emissions from dust particulates and disturbance from construction traffic.

When these effects are combined they could potentially create adverse (albeit temporary) combined nuisance effects on the identified receptor groups.

This adverse in-combination nuisance effect will occur throughout the construction programme, however, as works progress around the site, the effect experienced by the identified receptors / receptor groups will vary in magnitude and duration. Although construction traffic will affect the wider road network, it would only have an in-combination effect on those areas where noise, vibration and air quality effects are noticeable.

Excavation and earthworks are considered to have more severe noise and vibration and air quality effects due to the type of activities (e.g. piling / substructure construction). Construction traffic is also expected to be greatest during these periods.

The most sensitive receptors are considered to be existing adjacent residential properties. As a result, although the potential for combined nuisance effects has been identified, these effects are likely to be temporary not just in terms of the stage of works when they occur but in terms of where they occur across the site as well.

The identified in-combination nuisance effects are not untypical for a project of this nature. The ES has identified a number of best practice mitigation measures to eliminate, reduce or mitigate adverse construction effects in relation to noise and vibration, air quality and traffic. All the mitigation measures presented within this ES will be further reviewed throughout the detailed construction logistics planning, preparation of the DCMS and throughout preparation of the EMP and CLP. Best practicable means of preventing, reducing and minimising environmental effects through this phase of the Proposed Development will be adopted.

**Completed Development**

*Provision of Housing and Community Facilities*

The provision of housing will clearly result in benefits to those residents who move into the Proposed Development, as it will provide modern, efficient and well-constructed accommodation with associated open and amenity space and on-site child playspace.

The new residents as well as other existing local residents will also benefit from the space proposed for community use and a new community hall, and this is expected to combine with the provision of the new housing to forge improved social connections and strengthen the local community.

*Employment Creation and Additional Local Spending*

The neighbouring retail properties and local businesses will also benefit from the new retail aspects the Proposed Development will bring (retail, restaurant and health club), as it is expected to provide greater choice and selection for their own employees and encourage more potential custom to the area. The new residents of the Proposed Development will also lead to an increase in local spending, which is expected to also benefit the existing retail properties and businesses.

**16.2 Combined Effects of the Proposed Development with Other Development Schemes**

The EIA has addressed the potential cumulative effects of the Proposed Development in relation to other developments (that have been granted planning permission, including these schemes that are already under construction) that may have an additive effect on the surrounding area within 1km and have a gross external area of more than 10,000m$^2$.

These are illustrated in Figure 8, and are as follows:

- Showroom, 12-14 Baker Street, London, W1U 3BU;
- Cavendish Gate, Marcol House, 33 Margaret Street, 289-293 Regent Street, London, W1B 2HJ;
- 18 Hanover Square, London, W1S 1HX;
- 65 Davies Street;
- Park House, 116 Park Street, 467-471 Oxford Street, London, W1K 6NR; and
- Marble Arch Tower, 55 Bryanston Street, London, W1H 7AA.
17. Residual Effects and Conclusions

Chapter 16: Residual Effects and Conclusions of the ES provides a summary of the residual effects of the Proposed Development, during construction and once it is complete and operational.

The residual impacts (that remain following the implementation of mitigation measures) which are considered to be of moderate or major significance are considered to be the ‘likely significant environmental effects’ of the Proposed Development and are summarised below.

Throughout the construction phase, short-term negligible effects are anticipated with some instances of minor and moderate adverse effects; especially in relation to noise, vibration and construction plant emissions.

A principal contractor will be appointed by the Applicant to develop and implement a site wide EMP setting out how WCC’s requirements will be met. The site EMP will be prepared prior to the commencement of any on-site works in consultation with WCC and will identify mitigation measures that will be implemented on-site to reduce the potential for significant adverse effects. Subject to the implementation of the site EMP, the construction phase of the Proposed Development is not considered likely to have any significant, long-term effects on the natural or socio-economic environment.

The design of the Proposed Development has evolved through continuous consultation with planning officers at WCC and extensive consultation with local residents, along with key consultees.

The Proposed Development, when compared to the existing baseline, indicate adverse daylight and sunlight effects within each of the surrounding residential properties, with some instances of negligible effects. However, this is a factor of the unusually cleared baseline for the site and when a mirrored massing baseline was considered as an alternative baseline (in line with BRE guidelines); the effects are not as severe as initially suggested.

Once completed and occupied, the Proposed Development will have an overall positive effect on the local area. The residential element of the Proposed Development will provide a positive step towards meeting the targets for new
housing provision in WCC and Greater London as a whole (including affordable housing).

In transport terms, the Proposed Development incorporates measures which promote sustainable development and is designed to maximise accessibility by non-car modes. The internal parking and servicing arrangements would minimise any effects on the surrounding roads.

The overall conclusion of the EIA is that the Proposed Development will have an overriding beneficial impact on the City of Westminster and Greater London and will regenerate and enhance the site and contribute to the accessibility and connectivity of the wider area.

In particular, the site as it currently stands is underutilised and the redevelopment with high quality residential, retail and retail accommodation, will provide economic benefits through additional spending and job creation during the construction and operational phases.

In addition, the Proposed Development accords with the overall objectives of planning policies at national, regional and local levels, and is considered to be in accordance with the Government’s objectives for sustainable development.

References

Ref. 1 Her Majesty’s Stationery Office (HMSO), (2011); Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

Ref. 2 Department for Communities and Local Government (DCLG), (2012); National Planning Policy Framework.

Ref. 3 DCLG, (2011); Planning Policy Statement 10: Planning for Sustainable Waste Management.

Ref. 4 DCLG, (2014); National Planning Practice Guidance

Ref. 5 GLA, (2011); The London Plan Spatial Development Strategy for Greater London.

Ref. 6 GLA, (2013); Early Minor Alterations.

Ref. 7 GLA, (2014); Draft Further Alteration of the London Plan.

Ref. 8 WCC, (2007); Unitary Development Plan, WCC, London.

Ref. 9 WCC, (2013); Westminster’s City Plan: Strategic Policies.

Ref. 10 WCC, (2009); Moxon Street Car Park Planning Brief Supplementary Planning Document.