

# Summary of Comments on behalf of GUA/OONA in Response to Planning Application at One Portal Way Ref: 21/0181/OUTOPDC

Comments by A. Robinson, 4th February 2022

## Documents Reviewed as follows:

- | <u>No.</u> | <u>File Title:</u>                        |
|------------|---|
| 1 .        | 1 PW - Energy Statement.pdf               |
| 2 .        | env chapter ten daylight overshadow.pdf   |
| 3 .        | env climate change.pdf                    |
| 4 .        | env effects interactions.pdf              |
| 5 .        | env glossary.pdf                          |
| 6 .        | env likely significant effects.pdf        |
| 7 .        | env micro climate.pdf                     |
| 8 .        | env non-technical.pdf                     |
| 9 .        | gla pre-app May2.pdf                      |
| 10 .       | GUA comments on Imperial 1 Portal Way.pdf |
| 11 .       | OPDC Microclimate.pdf                     |
| 12 .       | Planning Statement 9732-1396795394.pdf    |

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**1 PW - Energy Statement.pdf** by WSP (200 pgs)

- |     |                                 |   |
|-----|---------------------------------|---|
| 1.2 | <b>Energy Strategy Summary:</b> | <ul style="list-style-type: none"><li>- AR: Passive measures to reduce energy demand - In summary what are these?</li><li>- AR: District network system proposed, however, what happens when residents introduce portable heaters, portable air-conditioning units, and fans for ventilation. This is likely to distort thermostats and controls that operate the central system, and the energy use of the building will increase.</li></ul> |
| 1.3 | <b>Results</b>                  | AR: Indicative U-Values for fabric elements shown, but the fabric elements that make-up the U-Value are not stated, neither is the % glazing. There is no indication of the anticipated indoor climate or the management-of   |

during peak winter, peak summer and seasonal times inbetween, Re: Heating, Cooling and Fresh Air.

- 5.1 **Building Fabric** TFEE = Target Fabric Energy Efficiency, "The Final Strategy for Compliance with TFEE will be defined as the design develops". AR: The report is restricted and limited within this context.  
Table 5-1: Fabric Performance Targets - Residential. AR: Party Wall U-Value shown as "0.00Wm<sup>2</sup>K", however walls between communal corridors in Block A and Block F are treated as Heat Loss walls??
- 6.2 **Over-heating Analysys Residential** AR: No cross-ventilation facility available via openable windows.  
AR: The report states "open windows or louvres when internal temperature exceeds 22°C and room is occupied" - Is this interlinked with the ASHP/WSHP/MVHR system?  
Overheating in the internal corridors indicated as a failing of these types of buildings.
- Pg 48 - 61 **Residential Over-heating Analysis Conclusion**  
AR: The report states that Energy Loads have been calculated using energy data based on experience and past projects of similar size and typology. More details required.
- 7.7 AR: The report states that "No individual heating system provided through-out development", however, this does not stop residents bringing their own portable electric heaters and electric fan heaters.
- Pg 61 1 Portal Way Block A Load Assessment: Indicates 20 No. EVCs at 7.2kW across the site.  
1 Portal Way Block F Load Assessment: Indicates 20 No. EVCs at 7.2kW across the site.  
AR: There is no mention of Electric charging for various other types of vehicles e.g. Mobility Scooters, Electric Bikes or Electric Scooters.

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**2. env chapter ten daylight overshadow**

(by Trium, Chapter 10: Daylight, Sunlight and Over-shadowing.)

- 10.7 AR: The neighbouring context for the report is within the immediate vicinity, however the visual impact and effects of the loss of seeing the sunset for neighbouring residents is not taken into account. It's a severe loss after having to endure years of relentless construction disturbance with the full-on negative on our health (mental and physical) and well-being for years.
- 10.112 to 10.115 AR: The report states that Major Adverse effect of daylight amenity considered permanent.  
It will cause obstruction to the view of the sky by those considered in the baseline.
- AR: The effect of the sun reflecting off the reflective glazing on the tall towers may have a negative impact on neighbouring buildings/residents e.g. Walkie-Talkie building at 20 Fenchurch Street. Façade element details and % glazing not provided.

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**3. env climate change.pdf**

(by Trium : Environmental Statement Volume 3 Technical Appendices)

Appendix :

**EIA Methodology**

- Annex 1: Scoping Opinion Request Report
- Annex 2: Scoping Opinion
- Annex 3: Response to Scoping Opinion
- Annex 4: Climate Change Technical Note
- Annex 5: Greenhouse Gas Assessment
- Annex 6: Cumulative Schemes

- 1.1 - 1.12 AR: The anticipated life of the building is not stated in the introduction, however in it is specified elsewhere that calculations are made on an anticipated life of 60 years i.e. to 2080.
- 1.4 AR: It states, in general the longer the life-time of a development, the greater the uncertainty about the impact of climate change over time.
- 1.38 - 1.39 AR: Wind data is **not** available for RCP8.5 adopted for use in reporting climate projections on impacts/effects. It states, UKCP18 guidance reports no significant trends in "storminess" which determine the max gust speeds from UK over the last 4 decades. AR: This year has seen 3 highly destructive storms within the UK.

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**4. env effects interactions.pdf**

(by Trium, Chapter 12 : Effects Interactions)

- 12.8 AR: The reports states that a "quantitive" approach has not been undertaken to the assessment of effect interactions. Instead any identified effect interaction is discussed qualitatively and, professional judgement has been used to determine whether the potential effect interaction (i.e. combination of individual effects) result in an "intra-project" cummulative effect on the receptor in question. What does this mean in layman terms?
- 12.9 AR: The report states that the scale of an effective interaction has not been assigned as part of this assessment. Reference is made to HS2 Reports of 2017 Re: Community Area Reports.
- 12.22 **Summary and Conclusion** AR: The reports states that during demolition and construction works of the Proposed Development there is likely to be significant effect interactions for Existing Residential Receptors in relation to Noise and Vibration, noting that these are temporary. AR: There is no indication of how long it will last and how far reaching it's impact will be. There is very likely to be detrimental effect interactions to existing residents in the area compounded by other HS2 and land development projects. The cummulative effects are catastrophic for those who have to endure it for relentless years.

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**5. env glossary.pdf**

- AR: What are the parameters of "Major", "Moderate" and "Minor" used to describe impacts/effects. These are not specified in relation to the "Residual", "Beneficial" or "Neutral" effects.

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**6. env likely significant effects.pdf** (by Trium, Chapter 13: Likely Significant Effects)

- 13.7 **Demolition and Construction**  
AR: This clause says no significant impact in relation to Demolition and Construction in relation to Socio Economic, Traffic and Transport, Air Quality, Wind Microclimate.  
AR: This is highly unlikely for those who live there or nearby and others who use the shops and facilities (hotels) in the area. The wider impact of these works combined with HS2 on-going construction and roadworks has not been considered. There are massive consequences to those who live and breathe these disruptions daily especially to mental health and physical well-being. AR: The reports uses terms for impact such as moderate, minor, major, beneficial etc. These have little meaning without specifying the parameters of human impact on health and well-being. How is this measured and what will it mean if in actuality the complete opposite occurs. What mitigating measures will be put in place?  
AR: Comparison is made to the summary and conclusions stated in Trium Chapter 12 - Effect Interactions (4. env effect interactions.pdf) in relation to Noise and Vibration, during demolition and construction.

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**7. env micro climate.pdf** (by Trium : Chapter 11 : Wind Microclimate)

- AR: Does the report / study take into account the effect of Climate Change and the increased incidents of high storms, mini hurricanes/tornadoes for the UK as seasonal temperatures increase. These weather changes will have an impact on the levels and spread of dust and pollution in the area combined with the wind-tunnelling effect of the surrounding high rise buildings.
- 11.122 AR: Mitigation measures where high winds indicated - what is the porous screen made of? What exactly is it? Deciduous and Evergreen trees indicated but what consideration given to the years needed for the trees to mature before they become effective.

11.185      **Demolition and Construction:**      AR: The reports states that cummulative schemes are not considered likely to have a material impact on the wind microclimate at the site. "Therefore, wind conditions during demolition and construction works at the site and surrounding area would present a likely negligible (not significant) effect." This conclusion is highly unlikely in light of recent works during the construction of Oaklands Towers combined with HS2 on-going site works. The impact on the local residents was and still is SEVERE!

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Item Ref:      **8. env non-technical.pdf**      (by Trium : Non-Technical Summary)

AR: This report is lacking in referencing. It requires a simplification of outcomes/findings in summary format with cross-referencing. My comments are noted under the various separate sections above.  
Additionally, by not providing parking for construction workers, who carry tools etc, they will likely park at nearby residential areas with private parking - this is an on-going situation with HS2 worker and was a massive issue when the Oaklands Towers were constructed.

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Item Ref:      **9. gla pre-app May2.pdf**      (Pre-Application GLA/0372/P2i, 1 Portal Way, North Acton)

(Pg 12)

47-50

Re: Transport Impacts, Vehicle Access & Car Parking, Delivery & Servicing.

51-52

AR: There is no mention of Electric Charging and parking of shared use Mobility Scooters, Electric Bikes, Electric Scooters.

53-54

Clear discussion regarding the number and parking locations of Electric Vehicles is not present.

Item 58      **Sustainable Development (Pg 14)**      Specific comments from GLA energy team not included (forward to applicant separately.

AR: What were these?

Item 64      **Cooling and Overheating**      AR: Details required in a simplified format i.e. external shading or ventilated façade?

Item 69      **Be Green Renewable Energy**      AR: Only Solar PV indicated. Have any other technologies been consider i.e. Fuel Cells?

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Item Ref:      **10. GUA comments on Imperial 1 Portal Way.pdf**

AR: Agreed.

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**11. OPDC Microclimate.pdf**

AR: Comments in this document request more explanation and detail for the topics listed:  
- Overall, Daylight/sunlight, Overheating, Noise, Drainage/Flood Risk, Green/Play Space, Waste/Recycling, Deliveries/Logistics, Reducing Carbon Emissions.

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**12. Planning Statement 9732-1396795394.pdf**

(by Icen Projects Ltd, Oct 2021)

- 1.8 AR: The report states that there is a "thriving student community" in the local areas. The students are an intermittent population and not reflective of the wider neighbouring residential communities. During summertime, North Acton is a "ghost town" as the students disappear.
- 3.11 **OPDC Community Review Group** - Expressed some concern about height, scale and massing.  
- Keen to see the deliver of social benefit for the community.
- 6.45 **Flexible Commercial/Community and/or Town Centre uses** AR: Will local residents be able to hold community/group meetings at these facilities, free of charge?
- 6.76 "Use of highly efficient build fabric" - AR: Details not indicated other than proposed U-Values. Seasonal Coefficients of Performance indicated for Air Source Heat Pumps (ASHP) however, mode of operation for use of ASHP, WSHP and MVHR not clear when windows are open summer or operation mode during peak winter or extreme weather conditions.  
AR: What back-up and standby measures are there?
- 6.79/ **Flood Risk and Drainage** AR: In the event of a localised weather emergency or other community emergency,  
6.80 what provision will there be for community to seek refuge, i.e. a hall with facilities to temporary sustain those affected?
7. **Conclusion** AR: No consideration given to the impact on the wider residential community who will be directly affected during demolition and construction and after the construction is complete. The combined effects of air-pollution, noise, disruption, loss of skyline and sunset view, wind-tunnelling effects of high rise buildings, with on-going HS2 works and other construction site development will be long-lasting and have negative impacts on the health and well-being of local residents who live and breathe it on a daily basis.  
AR: BREEAM "OUTSTANDING" should be the minimum requirement specified for construction.
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