

19/09813/FULL - 55 Broadway London SW1H 0BD

21st May 2020

We apologise for the late submission of The Thorney Island Society's reactions to the application for planning permission at 55 Broadway. We were consulted by the applicant at an early stage and given a tour of the building, but we were not informed by WCC that the application had been submitted.

While we welcome the fact that the exterior of this building will be renovated and improved by the removal of various excrescences, there are features of the conversion that worry us:

DAS 1.4 Change of Use

'There is no loss of retail related space'. The retail offer will change from useful local shops to 'flexible hotel/retail/spa/restaurant/bar space', as defined in the Sub-Committee Report. At the moment a large part of this space is designated as a Spa on the plans, which will not add to the retail offer for local people. What they need is the kind of useful shops (convenience stores, newsagents etc) that are becoming less common in the area.

DAS 3.3 Vertical Circulation – 55 Broadway

It is unclear how the two lifts described as being dedicated to hotel access to the first floor reception area will work – one of them does not appear to be accessible from the lobby. Also see our comments below under DAS 3.6.

DAS 3.3 Servicing (p. 33)

Is St Ermin's Hill really suitable for the servicing? White vans might be able to turn, but what about larger deliver vehicles? It worries us that servicing will only work either through cooperation with St Ermin's Hotel or by using small vehicles (as noted in the Sub-Committee report). If the servicing of St Ermin's takes 3.5 hours using large vehicles, how can the much larger 55 Broadway hotel be serviced during normal working hours using smaller vehicles?

DAS 3.3 Active frontages

'It is proposed to install fabric awnings over the windows.' We are opposed to the introduction of awnings on the Grade I building.

The retail frontage on Broadway and Petty France is an improvement, enlivening the street frontage, but it is to be part of the hotel's catering provision. Some units are provided inside the building, on the north-south underground access, but that will not enliven the street frontages. The new units in 100 Petty France will have a street frontage, which is welcome.

DAS 3.6 Ground Floor

We do not understand how the public north-south access is to work. We note that swing doors are indicated either side of the central lobby area. We also note that access to the hotel reception is via a staircase on one side of a subsidiary lobby and one lift on the other side (see above on Vertical Circulation). The second lift seems to be inaccessible from the subsidiary lobby and a third lift is designated as going directly to the 10-12th floors. On the

other side of the central lobby the bank of four lifts will either allow unsupervised access to the bedroom floors or they will have to be inaccessible at ground floor level, leaving just one lift for all hotel users to access the reception area. Our concern is that the hotel will find that managing this bottleneck (and the public crossing through the central lobby) will be difficult and they will in the end close the public north-south route. There should be a condition imposed that this through route must remain open to the public.

Certain internal arrangements seem to be unresolved, for instance a lack of WCs in the public ground floor area. It is to be hoped that planning permission for change of use will not be granted until the ground floor circulation is resolved.

The uncertainty is especially worrying in the context of a Grade 1 list building.

DAS 5.2.1 Energy

The *Energy Strategy* (p16) mentions the use of Air Source Heat pumps for heating and cooling, but on p. 12 there is a statement that space heating 'has been modelled to be provided by a gas-fired boiler'. If the bulk of the mechanical heating and cooling system is in fact to be achieved with air source heat pumps there will need to be a considerable number of them – located on the roofs of 100 Petty France and Wing Over Station.

However, we note, from the Sub-Committee report, that the heating and air conditioning plant has not yet been specified, and that it will be enclosed within acoustic louvred enclosures. The report also mentions a centralised gas-fired boiler as well as the air-source heat pumps we had already been told about. We are concerned that the practicalities of this have not been fully examined. Will it even be possible to heat and ventilate such a large building in this way? There should be no possibility of negotiations and compromises harmful to the environment if what is envisaged turns out to be impossible.

Further comments resulting from our examination of the Sub-Committee report.

Noise disturbance for neighbouring properties

It is proposed that a number of facilities in the hotel will be open to non-residents until midnight every day. This will undoubtedly cause disturbance locally.

Access to the underground station

We were disturbed to read in the Sub-Committee report that the northern (Petty France) entrance to the station will close at 22.00 'as it is now'. The Broadway entrance is much more important than the Palmer Street one, especially as it will serve the hotel, and the assumption is that residents will predominantly use public transport. The northern entrance at least should be open until the last train has run through.