

Neighbourhood Planning
Policy and Projects
Westminster City Council
Westminster City Hall, 17th Floor
64 Victoria Street
London SW1E 6QP

10th July 2020

Via e mail to neighbourhoodplanning@westminster.gov.uk

Dear Sir/ Madam,

ROYAL LONDON ASSET MANAGEMENT - RESPONSE TO CONSULTATION ON DRAFT 'REGULATION 16' SOHO NEIGHBOURHOOD PLAN

We are writing to you on behalf of our client Royal London Asset Management (Royal London) following the publication of the 'Regulation 16' version of the draft Soho Neighbourhood Plan for consultation.

Introduction to Royal London Asset Management

As a significant and experienced landowner, developer and investor, Royal London welcomes the opportunity to engage with this consultation. Royal London is the UK's largest life, pensions and investment mutual and prides itself on taking a responsible and long-term view in relation to its investment and management of assets and real estate. Royal London's primary focus in Soho and in the City of Westminster is in the investment and management of commercial properties.

Royal London has a considerable number of assets within both Soho and the City of Westminster as a whole. It has delivered or is in the process of progressing high quality commercial developments across the City. Within the Soho Neighbourhood Plan area, Royal London has recently delivered the office, retail and residential redevelopment of 149-151 Oxford Street. Royal London is also bringing forward an office and retail redevelopment at 103 Oxford Street further to the grant of planning permission in 2019.

In addition, a planning application for a major development scheme on the site of 31-32 Soho Square, 65-66 Frith Street, 10 Chapone Place and 22-25 Dean Street is currently pending consideration by the City Council. These holistic development proposals seek to deliver a new public realm, pedestrian route and enhanced and varied commercial accommodation to protect and provide a long-term future for the site. This is necessary to attract and retain a range of tenants including within the creative industries sector.

Beyond these development schemes, Royal London also own and maintain the following properties in the Soho Neighbourhood Plan area:

- 15 Great Marlborough Street, W1;
- 28-30 Lexington Street, W1F 0LF;
- Ham Yard, W1D 7DT;

Royal London's track record demonstrates its commitment and investment to its portfolio within Soho and the City of Westminster. It understands the long-term management of growth to create and support jobs and the economy.

Response to Draft Objectives and Policies

As a landowner and investor in Soho, Royal London recognises that this has always been a dynamic area which has evolved and changed over the years. We believe that investment and high-quality development has a key role in ensuring and safeguarding the area's vitality and vibrancy, providing accommodation and facilities which attract and retain employees and visitors to the locality. Well-considered development will be welcomed and has a key role in both recognising Soho's history and contributing to its ongoing success in the future.

Royal London is broadly supportive of the overarching objectives for Soho as set out in Section 6 of the draft Neighbourhood Plan. It is however crucial that a balanced approach is taken to enable the delivery of a continued supply of flexibly sized accommodation for business and the delivery of housing as set out in these objectives.

To this end, whilst we welcome many aspects of this emerging plan, we do consider there are some areas where we consider it is appropriate for amendments to be made in order to better facilitate the achievement of these objectives. We set out our response in relation to those areas of the plan below.

Policy 7 – New Office Developments

Policy 7 states 'Office development proposals should be designed to provide flexibly sized workspaces and accommodate a wide variety of business occupiers and large floorplate office developments designed for single occupiers should normally be avoided due to their adverse effects upon the character and heritage of the Plan area.'

We consider that to realise the objectives of providing flexibly sized workspaces and accommodating a wide variety of businesses occupiers, it is important to deliver floorplates that can be configured to accommodate large single occupiers or a range of businesses. This can enable companies to grow and adapt over time without needing to relocate. We consider policy 7 should recognise this and that for these reasons there should not be a stated presumption against larger office floorplates. It is important to note Soho is and has historically been home to businesses of a wide range of types and sizes. There are a number of existing larger office buildings in Soho, some of which are heritage assets.

We also do not consider it is appropriate to automatically conclude that offices with large floorplates have an adverse effect on the character and heritage of the Plan area. This very much depends on the scale and nature of the proposals and the character and appearance of the relevant area. The 'Soho Heritage and Character Assessment' by AECOM, which is referred to in this policy, identifies several sub areas within Soho which have their own distinct townscape characteristics.

Policy 8: Creating Active Ground Floor Uses in New Commercial Developments

We note policy 8 states 'new commercial developments will be supported where the ground floor accommodation includes active uses, which avoid under used space and accommodation, in order to maintain the vibrancy and diversity of the Plan area.'

Whilst we support the general principle of activating and animating frontages and maximising the efficient usage of space, it is important a flexible approach is taken depending on the existing character and context and pattern of uses in the immediate surrounding area. There are many scenarios where the provision of

new active uses and frontages can deliver significant benefits. We do not however consider a prescriptive Neighbourhood Plan policy in relation to active frontages is necessary, particularly given the distinct townscape characteristics that exist across various different parts of Soho.

Policy 15: Provision of Affordable Housing

Policy 15 states that *'where to meet Local Plan requirements affordable housing can only be provided 'in the vicinity', vicinity in this Plan is defined as normally being within the Soho Neighbourhood Area'*

We consider this approach is potentially too restrictive in terms of seeking to enable the delivery of off-site affordable housing. Policy 9 of WCC's own emerging draft City Plan states *'vicinity is not strictly defined to avoid unhelpful restrictions when dealing with different site circumstances or availability and will be assessed in light of the circumstances of each case'*.

Policy 22: Refurbishment and Retrofitting of Existing Buildings

We note Policy 22 states *'Major development must evaluate the potential of options to retrofit and improve the sustainability of existing buildings before considering redevelopment.'*

In making long term decisions regarding the future of existing buildings, there are a broad range of issues which will inform a decision as to whether a refurbishment or redevelopment scheme is the appropriate one to take forward. This will include (but is not limited to) an assessment of matters such as existing floor to ceiling heights, the suitability of facilities and services (e.g. cycle parking provision and waste storage) and inclusive access considerations. We consider that it is important that the Neighbourhood Plan acknowledges these wide ranging considerations and that the proposed policy approach reflects this.

Policy 31: Waste and Recycling Facilities in New Developments

We note part (B) of this policy states *'major commercial development in addition to providing adequate waste and recycling as required by policy 38 of the draft Local Plan should provide extra waste and recycling storage capacity (within the development) for designated neighbouring small commercial units within a 100 metre radius (provided it is within the boundaries of the City of Westminster).'*

We consider the policy should make reference to this being provided where feasible. It is important to note that such provision may often not be practical due to the design and operational management issues this could present.

We trust that our comments will be considered in detail. We look forward to being kept updated on the ongoing progress of the Soho Neighbourhood Plan. In the meantime, if you require any additional information or wish to discuss further, please do not hesitate to contact me.