

## SOHO NP

Comments from David Bieda COMMENTS IN CAPS

Wp ref: db/mds/2020 07 10 soho np

### **1. Culture and Heritage**

*Given the historic nature of the area proposals for tall buildings will not generally be supported.* SHOULD BE A PRESUMPTION AGAINST AS THIS WORKING IS TOO WOOLY.

*...and scale of the buildings they replace and where possible retain a traditional mix of occupiers.* AGAIN THIS IS TOO WOOLY & APPLICANTS WILL DANCE RINGS AROUND THIS.

### **2. Commercial Activity**

*Commercial or mixed-use development proposals must ensure that the availability of smaller commercial premises for office and retail use is not diminished.* SURELY THIS SHOULD SAY 'ON EACH SITE' AS DEVELOPERS CANNOT CONTROL OVERALL MATTERS?

*Those existing private members clubs which can demonstrate that they provide important places for business networking will be protected and new proposals may be supported.* I STRONGLY DISAGREE WITH THIS BECAUSE:

- A)** IT DOES NOT DIFFERENTIATE BETWEEN PROPRIETARY CLUBS & ONES ACTUALLY OWNED BY MEMBERS;
- B)** IT WOULD BE IMPOSSIBLE TO DEMONSTRATE *that they provide important places for business networking* AS ONE WOULD HAVE TO RELY ON THEIR EVIDENCE WHICH COULD NOT BE CONCLUSIVE AS THERE IS NO DEFINITION HERE OF *business networking* AND ANY CONVERSION COULD BE SAME IN A PUB FOR EXAMPLE;
- C)** PROPRIETARY CLUBS ARE BASICALLY LARGE BARS;
- D)** NO REASONS ARE GIVEN FOR SINGLING OUT THIS CATEGORY V.S., FOR EXAMPLE, POST PRODUCTION (OF WHICH SOHO IS THE UK CENTRE);
- E)** NO REASONS ARE GIVEN FOR *new proposals may be supported* AND WHAT DOES *may* MEAN?
- F)** GIVEN THAT ALL SUCH VENUES APPLY FOR ALCOHOL LICENSES THIS SECTION IS INAPPROPRIATE IN A 'STRESS AREA' AND 'CUMULATIVE IMPACT AREA' (2003 LICENSING ACT) AND WILL LEAD TO A LOSS OF RESIDENTIAL AMENITY;
- G)** THIS IMPLIES THAT CLUBS HAVE A MONOPOLY ON... *important places for business networking* WHICH IS A NONSENSE, SO DO RESTAURANTS, PUBS, CAFÉ'S ETC.
- H)** SEE WCC STATEMENT OF LICENSING POLICY 2.4.10

I LIVE NEXT TO BLACKS CLUB & AM AN HONORARY MEMBER OF BOTH THE GROUCHO & L'ESCARGOT CLUBS.

### **3. Entertainment and the Night-Time Economy**

**A)** *Existing music venues and other cultural uses will be protected. The development of new live music venues will be supported provided they are low impact in terms of noise and how the arrival and dispersal of customers is managed.*

IN RED IS IMPOSSIBLE WHICH IS ONE REASON FOR SOHO BEING A CIA. NO VENUES HAVE CONTROL OVER *dispersal of customers.*

**B)** THIS SECTION ORIGINALLY HAD A MIDNIGHT LIMIT & A QUALIFICATION AS TO SIZE WHICH SHOULD BE REINSTATED & IF CANNOT BE THIS SECTION SHOULD BE REMOVED AS IT WOULD ADD TO CUMULATIVE IMPACT.

SEE MAP BELOW ON RELATION TO CLUBS & MUSIC VENUES AS THAVE TEND TO HAVE LATE LICENSES.

#### **4. Housing**

*A) Affordable housing should be provided as part of new development or if not on site then normally within the SNA.*

**A)** THIS DOES NOT DIFFERENTIATE BETWEEN SOCIAL & AFFORDABLE HOUSING, A KEY ISSUE AS THE LATTER IS MORE NEEDED IN SOHO AS 'AFFORDABLE' IS BEYOND THE AVERAGE KEY WORKER.

**B)** *normally within the SNA* WHY QUALIFIED & IF SO SHOULD BE 'WITHIH THE WARD' & HOW WOULD 'NORMALLY' BE INTERPRETED WITHIN *THE TOWN & COUNTRY PLANNING ACT*? OVER A FRECERNT 10 YEARS PERIOD THE WEST END WARD RAISED £35M IN OFF-SITE CONTRIBUTIONS BUYT ONLY £4.5M WAS SPENT WITHIN THE WARD.

#### **5. Environment**

SAYS NOTHING ABOUT REFURISHMENT VS REDEVELOPMENT (COULD BE IN A. ABOVE AS RATHER MORE IMPORTANT THAT NTHE AREAS CURRENTLY HIGHLIGHTED).

#### **The Strategic and Planning Context**

DOES NOT MENTION THE CIA OR STRESS AREA.

#### **Living in Soho**

DOES NOT MENTION THE WARD STATS WHICH DIFFERENTIATE THE URBAN VILLAGES AROUND OXFORD STREET FROM 'INNER LONDON' EG BELOW & ATTACHED.

Street	Sum of Service Requests
Brewer Street	19
Dufour's Place	14
<b>Dean Street</b>	<b>13</b>
Bedfordbury	11
Berwick Street	11
Charing Cross Road	11
Old Compton Street	11
Wardour Street	10

SEE ATTACHED STATS PROVIDED BY WCC 04 09 2014

#### **6. THE OBJECTIVES FOR THE PLAN**

THIS DOES NOT INCLUDE PUBLIC REALM IMPROVEMENTS, E.G. FOOTWAY WIDENING AND THE REMOVAL OF THROUGH TRAFFIC WHICH WOULD REDUCE AIR POLLUTION & IMPROVE PEDESTRIAN MOVEMENT.

#### **7. THE PLAN POLICIES**

##### **SECTION 1 CULTURE AND HERITAGE**

COULD INCLUDE UP-DATING THE CONSERVATION AREA STATEMENT.

##### **Policy 2: Proposals for Tall Buildings**

THE PROTECTED VISTA'S MAP COULD INCLUDE LOCAL ONES.

### **Policy 5: Shop Fronts and Ground Floor Frontages**

THIS IS ALL VERY GENERAL & WOULD BENEFIT FROM ILLUSTRATED EXAMPLES OF APPROPRIATE & NEGATIVE FACADES. STREET FACADES SUCH AS BELOW WOULD ASSIST IN EXPLAINING THIS SECTION & ALSO RELATE TO ISSUES OF HEIGHT & BULK IN OTHER SECTIONS.



### **Policy 9: Providing Public Art to Reflect Local Culture and Heritage**

IF THIS RELATES PLANNING GAIN AGREEMENTS, I THINK THEIR DEPLOYMENT FOR PUBLIC REALM IMPROVEMENTS ARE FAR MORE IMPORTANT THAN PUBLIC ART, GIVEN THE STATE OF FOOTWAYS & CARRIAGEWAYS IN SOHO.

### **Policy 11: Private members Clubs**

**Proposals for existing private members clubs that have demonstrated their role as an important facilitator of networking which seek to change them to other uses will generally be resisted unless an active marketing test indicates that the use is no longer viable. Proposals for new private members' clubs may be supported and will be expected to be in conformity with Paras 17.2 and 17.4 of Policy 17 of WCC's draft Local Plan 2019-40. Links to Plan Objective 2.**

I DISAGREE WITH ALL THIS & REJECT THE JUSTIFICATIONS GIVEN AS PER MY COMMENTS IN **2. Commercial Activity**.

*New clubs will need to demonstrate that their potential adverse impacts such as pedestrian and traffic generation, late night use and anti-social behaviour are adequately*

mitigated and have a clear management plan to prevent nuisance to neighbouring occupiers.

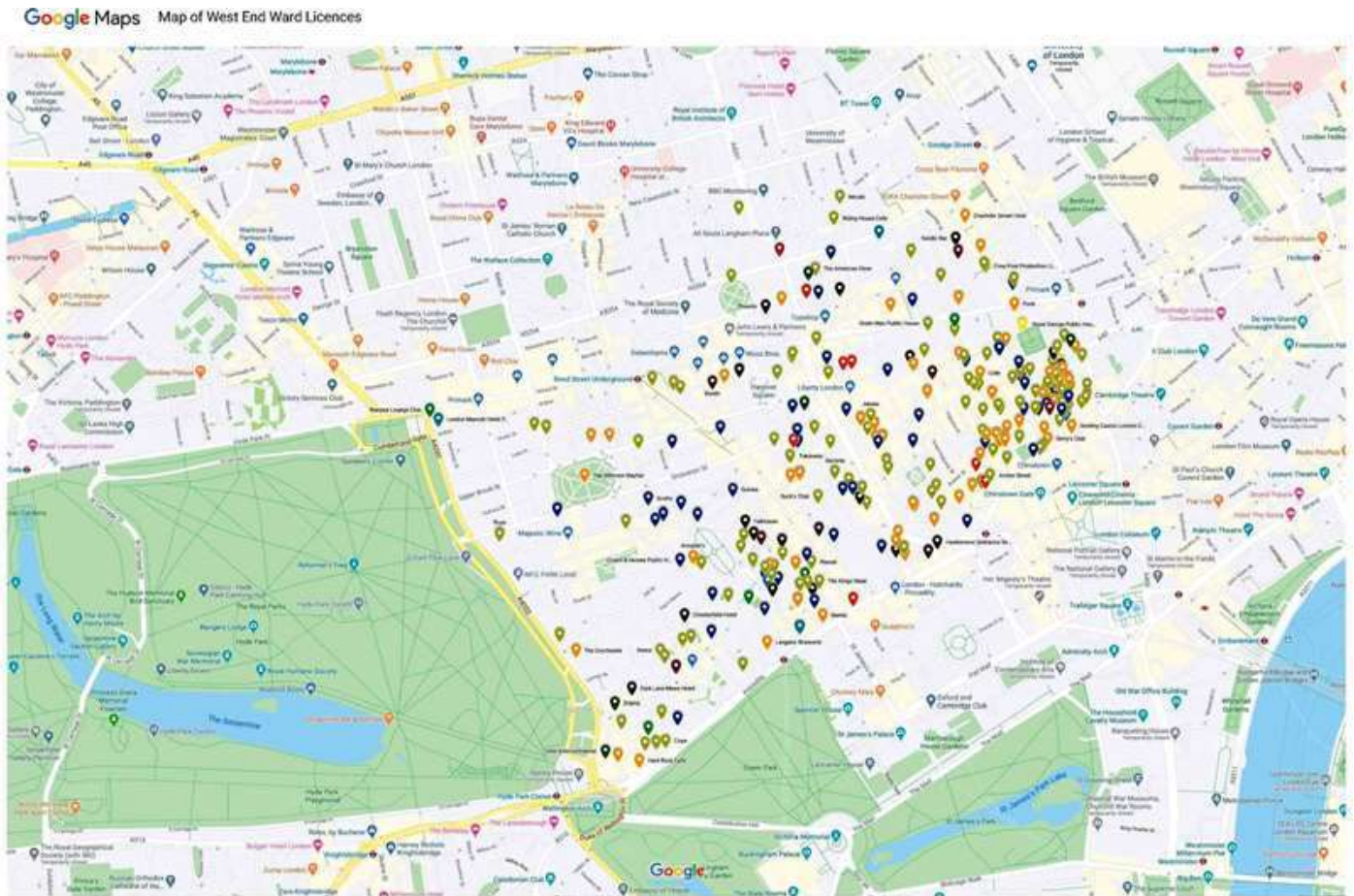
THIS IS CONTRARY TO VARIOUS STATEMENTS ABOUT IMPROVING RESIDENTIAL AMENITY AS SOHO AS FAR TOO MANY LICENSED PREMISES AS CAN BE SEEN FROM BELOW WHICH IS ONLY THOSE FROM 00.30 TO 6.00. MAP IS THE WEST END WARD.

**Policy 12: Live Music Venues**

*While wishing to support the provision of live entertainment as an important part of Soho culture and identity, this Plan wishes to prevent as far as possible the harmful impacts that continue to be identified by neighbours, police and Council. Conditions should be attached to any resulting planning permissions for such D2 uses clearly restricting the maximum number of customers on the premises as agreed with Westminster City Council’s Environmental Health Department, specifying the opening and closing hours and other suitable operating conditions.*

*Sleep deprivation or repeated disruption has been shown by a number of studies to have an adverse impact on health, including mental health, and wellbeing and new development should not undermine further already challenging night-time ambient noise levels.<sup>44</sup>*

THE ABOVE WOULD ALSO APPLY TO PRIVATE MEMEBRS CLUBS.



THE MAP ON PAGE 31 LACKS RESIDENTIAL & LICENSES PREMISES WHICH ARE KEY TO MANY OF THE PLAN’S ASPIRATIONS & ALSO RELATE TO THE SECTION FOLLOWING.

**Policy 19: Delivery and Servicing Plans for New Development**

AT PLANNING APPLICATIONS THESE ARE OFTEN QUITE DIFFERENT FROM ACTUALITY & THERE SHOULD BE A POST **New Development** TEST.

**Policy 27: Pedestrian Movement in Development Proposals**

I THINK THERE SHOULD BE AN ADDED BLOB WHICH IS:

ALL DEVELOPMENT PROPOSALS SHOULD INCLUDE CONTRIBUTIONS TOWARDS PUBLIC REALM IMPROVEMENTS EITHER ADJACENT TO THE SCHEME, OR TO GO INTO AN OVERALL 'POT' TO IMPROVE THE STREETS IN SOHO.

**Policy 28: Securing New Pedestrian Routes**

THIS SHOULD BE MORE SPECIFIC & RELATE TO PUBLIC REALM IMPROVEMENTS.

**8. GLOSSARY**

OMITS CUMULATIVE IMPACT & STRESS AREAS.

