

Soho Neighbourhood Plan Comments

As a long-standing resident of Soho, as with the City Plan, the idea that the premise here is *development* just seems wrong. This is because:

- Soho, and a considerable part of its existing fabric, is 300 or more years old
- its space is already intensively - arguably over-intensively – used, not only the heavily-used narrow streets and tightly-packed buildings but also the open spaces such as Soho Square and St Anne’s Gardens
- it is a conservation area
- the opening of the Elizabeth Line will bring even more people into the area
- it is already a stress area and a cumulative impact area for licensing purposes.

The City Plan fails adequately to recognise these issues or to provide a vision as to how Soho’s unique character can be preserved. This constrains the Neighbourhood Plan, which itself acknowledges the issues, calling Soho “already a complexly developed area”.

Policy 2A

If “tall buildings” means those more than twice prevailing context height (4 storeys), this policy is too weak to have any useful effect, as 7-storey buildings would generally be allowed.

As to alterations to existing buildings, the policy doesn’t prevent increases of height except where the building is already tall.

Despite Soho’s small area and being a conservation area, the policy isn’t even general; it is limited to where the tall building would have an adverse impact on the squares and gardens, strategic views or other heritage assets. So, for example, a new tall building to the north of a street of heritage buildings will not be prevented because the existing rules on loss of daylight don’t apply.

It is imperative that this policy be strengthened so as to preclude buildings over the height of neighbouring properties otherwise over time heights will keep increasing.

Policy 2B

Infill developments of any type should in general be prohibited. By their nature they eliminate airspace from the rear of adjoining and nearby buildings, and create larger floorplates, inconsistent with the general objectives.

Policies 3, 4 5

Supported.

Policy 6

Whilst provision of space for small-scale businesses is an appropriate objective, this policy will be ineffective.

First, it supports major developments, whereas major developments should not be supported except in exceptional circumstances. In Soho, there can be no development, only redevelopment.

Secondly, the policy is too easily undermined in practice. That space is flexible does not preclude a single large corporate tenant taking it. And once built, these types of constraints are frequently changed by stealth, consent or change of law or policy.

Policy 7

Largely as for Policy 6.

Policy 8

This underlines why major developments are inappropriate. The various examples that have already been built such as on Broadwick Street are bland and uninviting at street level. Ilona Rose House looks as if it will repeat these mistakes. Other examples in Fitzrovia show that the approach is simply wrong for Soho.

The policy is right that active and vibrant ground floor uses are a requirement in Soho, but that of itself cannot justify a new commercial development.

Policies 9 and 10

Supported.

Policy 11

The exclusion for where there is an active marketing test undermines the policy as a sham marketing is too easy to arrange.

Policy 12

Supported.

Policy 13

Supported, but the reference to adverse impacts on residential amenity “which cannot be mitigated” is incorrect. Any adverse impact on residential amenity should be fatal. Mitigation should be within the developed premises; if the premises as proposed will have an adverse impact, a payment for double glazing should never be an acceptable solution.

Policy 14

Supported.

Policy 22/seriatim

The Plan as a whole omits dealing with an important feature of many Soho buildings, that is their lightwells (including those that have been covered over and become part of the street footpath).

For example, plans for the redevelopment of the 20th Century Fox Building sought to make use of the lightwell space and move the frontage to the boundary of the curtilage. If approved, this would materially and adversely affect Frith Street and Soho Square.

There should be a prohibition on any development which seeks to build above street level on lightwells, whether at the front or rear of buildings.

Minor errors/typos

- p16 various typos – 1 its not is, 4 the continued local of live music, 8 amounts *of*waste;
- the second column of Reasoned justification on p 17 is repeated in full on p 18.

10 July 2020