



Dear Anna Doyle,

Thank you for consulting the Mayor of London on the Submission version of the Soho Neighbourhood Plan (SNP). As you are aware, paragraph 29 of the National Planning Policy Framework (NPPF) 2018, makes it a requirement that neighbourhood plans within London must be in general conformity with the London Plan. The Development Plan for the Soho Neighbourhood Area includes the London Plan and the Westminster City Plan and the new emerging draft Westminster City Plan 2019-2040.

### **The Intend to Publish (ItP) London Plan**

The Mayor first published his draft new London Plan for consultation on 1st December 2017. Following examination, the Panel's report, including recommendations, was issued to the Mayor on 8 October 2019 and the Intend to Publish version of the London Plan was published on the 17 December 2019. Publication of the final version of the new London Plan is anticipated later in the year, at which point it will form part of Westminster's Development Plan and contain the most up-to-date policies.

Given the timing, the neighbourhood plan must be in general conformity with the new London Plan. In addition, the Intend to Publish (ItP) version of the London Plan and its evidence base are now material considerations and officers welcome the SNP's reference to both the published and ItP London Plans.

The Soho Neighbourhood Plan is in general conformity with the current and emerging London Plans and the Officer's response below provides support and offers guidance that should be followed to improve the emerging neighbourhood plan and align it more closely with the ItP London Plan.

### **General**

The extent of the neighbourhood plan area is set out clearly and precisely early on and this is welcomed by Officers. A summary of policies is included at the beginning and its focus on the positive approach to the area's heritage, economy, culture and the local environment is noted. The strategy is one which simultaneously embraces growth while balancing this against the desire to protect and enhance culture and heritage in the local area.

Neighbourhood planning provides communities with the opportunity to set out a positive vision for how they want their neighbourhood to develop over the next ten, fifteen or twenty years. It is about enabling rather than restricting development and a neighbourhood plan should demonstrate how it positively contributes towards achieving good growth. The NPPF makes clear that neighbourhood plans should

support the strategic development needs set out in Local Plans and plan positively to support local development.

Officers have noted and are pleased that the advice offered in the earlier Regulation 14 response has largely been followed. The current draft of the SNP now highlights the area's relationship with the proposed Soho Special Policy Area, the Tottenham Court Road Opportunity Area and the Soho Conservation Area.

Eight objectives, clearly set out in Chapter Six underpin the neighbourhood plan and are the result of extensive consultation with the local community. This close engagement and the involvement of local people in the development of the Neighbourhood Plan is noted and applauded by officers.

Officers also consider that the SNP balances well the intention to preserve and enhance the character of Soho, including its heritage, culture and attractiveness to businesses with the aspiration to take on appropriate types of sustainable growth in a measured and considered way. The chosen strategy is one which takes account of up to date evidence including the emerging Westminster City Plan 2019-2040, West End Good Growth Report 2018 and the Soho Heritage and Character Assessment 2018 and is therefore based on local and up-to-date evidence.

### **Heritage**

Draft Policy 1 of the SNP supports and promotes development which responds to the neighbourhood by protecting and enhancing the characteristics of the Soho Conservation Area. The SNP demonstrates a clear understanding of the historic environment and the heritage value of the area and this is consistent with Intend to Publish London Plan Policy HC1. The vision is clearly established in Chapter 5 and seeks to embed the role of local heritage in place making.

### **Tall Buildings**

The SNP's approach to tall buildings has been amended since the Regulation 14 consultation and is now more clearly aligned with the emerging Westminster City Plan and its definition of what constitutes a tall building. The SNP's approach is one which balances the need to protect and enhance the area's heritage with the borough's growth ambitions. Policy 2 identifies those areas most sensitive to tall buildings and makes reference to three London Strategic Views which run through the area and are clearly set out in Figure 3. The approach now reflects the one set out in ItP London Plan Policy D9 and is welcomed by officers. The London Strategic Views illustrated in Figure 3 of the neighbourhood plan are panoramas illustrated in the London View Management Framework and are specifically those views from locations 2A.1, 2B.1 and 4A.1 and could be referenced in the Neighbourhood Plan for clarity. In this respect the SNP is consistent with ItP London Plan Policy HC3.

### **Culture**

Draft Policy 12 seeks the protection and promotion of live music venues where this is considered appropriate. The proposed approach is one which reflects Policy HC6 of the ItP London Plan and supports London's night-time economy and the Mayor's vision for London as a 24-Hour City.

The draft SNP recognises the LGBT+ community and how this has over time become part of the area's identity and this acknowledgement is welcome. In accordance with paragraph 7.6.11 of the ItP London Plan the SNP should recognise how the cultural offer in Soho serves and plays such an important role for the LGBT+ community and should seek to protect and enhance related facilities, especially those used in the evening and night time and illustrated in the [Mayor's Cultural Infrastructure Map](#). In addition, the SNP is encouraged to promote the [Mayor's LGBTQ+ Venues Charter](#) in order to support these types of venue.

### **Parking**

The requirement, in draft Policy 16, that residential development should be car free except for disabled persons car parking and that occupants of new housing have no right to apply for a residents parking permit is strongly supported and consistent with transport and parking policies in the London Plan

### **Other matters**

Reference to the agent of change principle in draft Policies 4 and 13 is welcomed and is consistent with ItP London Plan Policy D13, clearly establishing the responsibility of managing and mitigating noise impacts and other potential nuisances.

The SNP's intention to provide suitable space from commercial development for small and medium sized businesses as set out in Policies 6, 7 and 10 is welcome and is in line with ItP London Plan paragraph 6.1.5 and Policy E2 which promotes these commercial spaces at appropriate rents in order to meet the needs of micro, small and medium sized enterprises and which are also suitable for business start-ups.

The support for the provision of public toilets in draft Policy 14 is welcomed and should be amended to incorporate reference to Policy S6 of the ItP London Plan. This policy seeks the provision of public toilets from large scale developments (Category 1B, of Part 1 of the Town and Country (Mayor of London) Order 2008 or a locally defined development threshold).

The draft Neighbourhood Plan in Policy 20 intends to improve air quality through better design, the introduction of green infrastructure and through the incorporation of on-site renewables, which is welcome and consistent with Policy SI1 of the emerging London Plan.

Significant thought has gone into how the SNP can promote sustainability through the reduction of energy use, emissions and the retrofitting of existing buildings. These aspirations are welcomed and supported by officers and are consistent with the ItP London Plan Policy SI2 which promotes the energy hierarchy so that new development is lean, clean, green and seen. The SNP should include reference to the energy hierarchy and Policy SI2.

The promotion of green infrastructure in draft Policies 25 and 26 is very welcome and reflects the purpose of Policy G1 of the ItP London Plan.

Officers are strongly supportive of the SNP's intention, in draft Policy 23, that the Brewer and Poland Street Public car parks be earmarked for redevelopment as micro-consolidation centres. Officers note that the earlier intention to safeguard the sites as

car parks for a minimum period of five years has now been removed and this is welcome. Micro-consolidation centres would support the functioning of the CAZ by providing capacity for industry and logistics for last mile distribution to support businesses and activities within the local area in accordance with draft new London Plan Policy SD4M.

**Glossary**

Affordable housing – the definition in the Mayor’s Affordable Housing and Viability Supplementary Planning Guidance should be used. Officers note that the current description in the glossary has now been amended to include intermediate housing and this is welcome. Reference to the Mayor’s preferred genuinely affordable housing tenures set out in paragraphs 4.6.3-4.6.9 of the ItP London Plan is encouraged.

Central Activities Zone – Officers are happy that the glossary now refers to ItP London Plan Policy SD4 which defines the CAZ and its functions.

I hope you have found these comments helpful to inform the preparation of the Soho Neighbourhood Plan. If you would like to discuss any comments in this letter please contact me, [REDACTED]

Can you please confirm receipt of this email?

Thank you.

Regards

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