

# **Statement of Common Ground between Westminster City Council and the Soho Neighbourhood Forum**

## **Introduction**

This Statement of Common Ground has been prepared jointly between Westminster City Council ('WCC') and the Soho Neighbourhood Forum ('the Forum'). It has been prepared to assist the Examination of the Soho Neighbourhood Plan ('the Plan'), by informing the Examiner of areas of agreement and disagreement between both parties.

## **Background**

As part of the Regulation 16 Public Consultation on the Soho Neighbourhood Plan, WCC submitted a comprehensive response to the Plan. WCC considered that most of the Plan meets the Basic Conditions set out in the Town and Country Planning Act 1990 (as amended) and the Neighbourhood Planning (General) Regulations 2012 (as amended).

However, concern was raised over some of the policies in the plan and interpretation of some aspects of planning guidance and regulation. The Forum provided a response to WCC's representation on receipt of the Examiner's Procedural Matters and Questions Letter (14th September 2020). As part of the procedural matters, the Examiner requested that WCC and the Forum collaborate on a Statement of Common Ground to set out the modifications that are agreed by both parties and the reasoning for areas of disagreement.

## **Proposed modifications**

The Forum have submitted an updated and track-changed version of the Soho Plan, produced in conversation with and following advice from WCC officers. The proposed modifications are set out as tracked changes in red within the document for ease of review (Appendix 3). The council considers the majority of these modifications acceptable in principle. However, in order to meet the Basic Conditions, the resolution of a number of outstanding issues would still be required as set out below.


## **Outstanding issues**

There remain a small number of policies and supporting text where the council have identified outstanding conformity issues with higher tier plans. All outstanding issues where WCC disagrees with the Forum are set out in Appendix 1 below. The Soho Neighbourhood Forum has also provided its response to these issues.

## **Further recommendations**

WCC have prepared a schedule of further changes that are recommended to improve the effectiveness of the plan (Appendix 2), particularly with regards to Paragraph 16D of the NPPF to ensure the policies in the plan are clearly written and unambiguous, as pointed out by the Examiner in her letter. The Soho Neighbourhood Forum has also provided its response to these recommendations.

**Signed on behalf of Westminster City Council**

Name	Signature	Date
Kimberley West Head of City Planning Policy, Westminster City Council		23 <sup>rd</sup> February 2021

**Signed on behalf of the Soho Neighbourhood Forum**

Name	Signature	Date
Matthew Bennett Chair of the Soho Neighbourhood Forum		23 <sup>rd</sup> February 2021

## Appendix 1 – Areas of Disagreement

Section of the Plan	WCC Disagreement	SNF Response
<b>(New) Policy 13 / RJ – Last paragraph</b>	We object to this paragraph as we believe references to planning obligations, contributions or any other type of payments should be removed. Public toilet provision is only required for developments that generate a large number of visitors under City Plan policy 15. Smaller developments would expect their contribution towards provision of this infrastructure to be made through the Community Infrastructure Levy.	Please see proposed alternative wording set out below in Appendix 2 for all paragraphs of the RJ.
<b>(New) Policy 15 / RJ – Second paragraph</b>	The paragraph should be amended to take into account proposed modifications to the City Plan 2019-2040 (e.g. Appendix 2 is being deleted). This paragraph could explain how the London Plan and the City Plan support the policy approach.	The Forum proposes the following alternative wording:  “The need for this policy is supported by the fact that Transport for London’s (TfL) PTAL assessment show that Soho has the benefit of the widest range of tube, bus, cycle hire and public and private taxi hire options anywhere in Westminster and London to provide alternative methods of transport. The City Plan also requires development to be car free.”
<b>(New) Policy 15 / RJ – Third paragraph</b>	<b>As explained in the council’s Regulation 16 response, we believe this is not in conformity with the City Plan.</b>  We suggest this paragraph is deleted.	The Forum agrees the existing wording should be deleted and proposes the following alternative wording:  “Where the developer of residential accommodation without on-or off-site parking wishes to go beyond the minimum mitigation measures required in the City Plan to relieve the impact of parking on Westminster’s streets they could decide that in selling, leasing, letting or otherwise disposing of the accommodation provided in the development they will require by legal agreements with occupiers (other than disabled people) before occupation that the occupiers give up their right to apply for a resident’s parking permit.”
<b>(New) Policy 15 / RJ – Fourth paragraph</b>	The paragraph should be amended to take into account modifications to the City Plan 2019-2040 (e.g. some of the specific paragraphs and sentences referenced have been deleted and the quote from the City Plan is proposed to be deleted in our modifications schedule).	The Forum proposes the following alternative wording:  “The City Plan states that ‘when considering parking impacts the council will prioritise alternative kerbside uses ahead of parking for private vehicles’ and that ‘proposals for motor vehicle will be assessed against objective of reducing motorised travel’. The City

		Council's Walking Strategy 2017-2027 refers to the city as having one of the most extensive public transport systems in the world and that it is important to achieve behaviour change in relation to modes of transport."
(New) Policy 17	<p><b>We believe (New) Policy 17 is not in conformity with the City Plan and the council's Code of Construction Practice (CoCP).</b> We suggest the policy is deleted or redrafted to be in accordance with the City Plan and the CoCP, as explained in the council's Regulation 16 response.</p> <p>The requirements of the CoCP are only to require a Site Environmental Management Plan (SEMP) on clearly defined L1 and L2 scale schemes; and to only require a Construction Management Plan (CMP) on basement development. Moreover, the CoCP only requires these to be submitted pursuant to a planning condition. (New) Policy 17 seeks these details at application stage. The council does not support this for a range of reasons: (i) because this is not a ground on which permission is reasonably going to be refused (benefits of development will likely always outweigh temporary construction impacts); and (ii) the details in CMPs submitted with applications in practice never accurately reflect the construction practices adopted by the contractor who is not usually appointed until after planning permission is secured.</p> <p>Our preference is for this policy to be deleted, but if retained, we suggest the policy is reworded as follows:</p> <p><b><u>"Development proposals likely to generate significant construction impacts, including cumulatively, should demonstrate how these are to be avoided, mitigated and/or managed. This will be secured by ensuring compliance with the council's Code of Construction Practice".</u></b></p>	<b>The Forum wishes to retain this policy, but accepts the proposed wording drafted by WCC.</b>
(New) Policy 17 / RJ	In line with the council's comments on the policy wording, we suggest the RJ for (New) Policy 17 is redrafted to focus on the application of the Code of Construction Practice, indicating that this will be secured via planning condition.	The Forum proposes alternative wording for the first RJ paragraph, as below.

<p><b>(New) Policy 17 / RJ – First paragraph</b></p>	<p>This paragraph references Policy 7 in the City Plan. Although it may be relevant to reference Policy 7, Policy 33 deals with “Local Environmental Impacts”, which is the primary topic of this policy.</p>	<p>The Forum proposes the following alternative wording:</p> <p>“This Plan welcomes the sections of the City Plan which emphasize that development should minimize local environmental impacts and be managed in ways that are neighbourly. In the Neighbourhood Area, these policies can be achieved by really thorough prior consideration of, and consultation on, the demolition and construction impacts of major development and then recorded clearly (though documents such as Construction Management Plans) in accordance with Westminster’s Code of Construction Practice.”</p>
<p><b>(New) Policy 17 / RJ – Second paragraph</b></p>	<p>This paragraph is about Soho as a “Stress Area” and deals with the cumulative impacts of the concentration of uses, not their construction impacts. As this is not directly related to the policy it should be removed.</p>	<p>The Forum proposes the following alternative wording:</p> <p>“Some parts of the neighbourhood area have experienced a high level of disruption through continual development and other works leading to a sense of over-development in recent years. This has negative construction impacts including noise, dirt, air pollution and traffic disruption. The declaration of Soho as a ‘stress area’ in 1993 and the creation of a Soho Special Policy Area in the City Plan are examples of the ways in which the Council has recognised these continuing pressures. Public consultation on this plan also indicated real concern about these impacts as well as increased anti-social behaviour in locations where the quality of the general environment has declined.”</p>
<p><b>(New) Policy 17 / RJ – Third and fourth paragraphs</b></p>	<p>As explained above, we object to the policy going further than the council’s framework for assessing construction impacts as set out in the City Plan and the council’s Code of Construction Practice (CoCP).</p> <p>Reference to developers having to consider dust, among others, when developing their schemes should be removed as this is not part of the design process, but rather an impact to be mitigated / controlled via a SEMP or CMP pursuant to the COCP post permission being granted.</p> <p>It is also unclear what the last sentence of the RJ intends to explain. This is not directly related to the construction thrust of the policy.</p>	<p>The Forum proposes the following alternative wording:</p> <p>“Development has an important part to play in Soho’s future to allow it to evolve, but multiple developments taking place simultaneously in such a small area are likely to have cumulative impacts on amenity and the desirability of Soho as a destination. The use of the Code of Construction Practice will involve prior consideration of the potential impacts involved and where this is coupled with local consultation will help local businesses and residents prepare for and minimise disruption to themselves. Local consultation can also help more widely to ensure the development minimizes wider impacts by discussing things like diversion signage, phasing of</p>

		construction and highway utility works which if not carefully thought through and communicated can be causes of wider disruption.”
<b>(New) Policy 18 / RJ – Third paragraph</b>	We object to this paragraph as it is not needed. If the Forum still wants to mention this issue, we suggest the paragraph better explains how monitoring fees would work (e.g. how this issue should be factored in when calculating S106 monitoring fees).	The Forum proposes the following alternative wording:  “Also, the Forum recommends that the developer is encouraged to provide a sum to Westminster City Council as part of Section 106 monitoring fees which is allocated to cover the cost of the Council undertaking one or more monitoring visits to the development to check that the DSP is working as proposed and consider any necessary amendments or enforcement action required.”
<b>(New) Policy 21 / RJ – Final paragraph</b>	We object to this paragraph as it is too onerous for developers to consider all retrofitting opportunities and justify why individual options have been discounted, especially as some options will not require planning permission. We suggest it is deleted.	The Forum proposes the following alternative wording:  “In order to help innovation in construction practice towards achieving further carbon reductions as part of development, major development proposals are encouraged to show how the proposals have considered the potential of retrofitting and to make clear where they have been able to retrofit or reuse materials and to indicate the constraints (if any) they experience in adopting further such measures.”
<b>Section 9</b>	We suggest this section is deleted and does not form part of the Plan. It could be a standalone document.	The Forum considers the evidence base to be part of the plan and should be accessible within it.
<b>Section 10</b>	We suggest this section is deleted and does not form part of the Plan. It could be a standalone document.	As set out in the ‘In Brief’ section and the Introduction to the Plan there is repeated explanation of the reasoning for including as part of the plan documents the non-statutory recommendations as they were an integral part of the public consultation process leading to the creation of this Plan and we would object to their removal.

## **Appendix 2 – Further changes recommended by WCC**

<b>Section of the Plan</b>	<b>Further changes recommended by WCC</b>	<b>Soho NF response</b>
<b>General</b>	Throughout the plan, paragraphs reference policies that will be superseded on adoption of the new Westminster City Plan.	The Forum accepts this recommendation and will ensure all policy references are up-to-date following the examination, once the new Westminster City Plan is adopted.
<b>Section 4 / Living in Soho – First paragraph</b>	It is unclear if the second sentence talks about the West End ward or Soho in particular. We suggest this is clarified.	The Forum propose adding 'in Soho' after 'Living accommodation' at the start of the sentence.
<b>Policy 1 / RJ – Second paragraph</b>	When the RJ explains that "there are many unlisted buildings of merit", it should explain where these can be found. We suggest the text references the Soho Conservation Area Audit.	The Forum propose adding 'as can be found in the Soho Conservation Area Audit' after the quoted phrase.
<b>Policy 2 / RJ – Second paragraph</b>	When the RJ talks about "unlisted buildings of merit", it should explain where these can be found. We suggest the text references the Soho Conservation Area Audit.	The Forum propose adding 'as can be found in the Soho Conservation Area Audit' after the quoted phrase.
<b>Figure 2 Map of Soho Conservation Area</b>	The map should be updated to include neighbouring Conservation Areas.	The Forum will update the map following the examination.
<b>Figure 3 Protected views across Soho</b>	The map should be updated to include the three open spaces.	The Forum will update the map following the examination.
<b>(New) Policy 6 / RJ – Last two paragraphs</b>	We believe the RJ should try to explain a bit better what "large floorplate office developments" are so the policy is clear and effective and can be consistently applied.	The Forum propose inserting the words 'which are out of scale with the prevailing context character and plot widths' in the second sentence of the penultimate paragraph after 'It makes clear that large floorplate.'
<b>(New) Policy 7 / RJ – Last paragraph</b>	It is unclear if the text refers to the Conservation Area or the Neighbourhood Area. We believe this should be clarified.	The Forum propose inserting the words 'in the Soho Neighbourhood Area' after these words starting the first sentence of the RJ. 'This policy requires development proposals'. The reference to conservation area was to relate it to reference 30 from the Public Soho Public Realm Study.
<b>(New) Policy 8 / RJ – First paragraph</b>	We believe the RJ should be updated so it is in line with the new policy wording. References to "conditions" should be removed.	The Forum propose altering the first part of the second sentence of the RJ as follows: 'Where development provides public art or does so as a condition of planning permission...'

<p><b>Figure 4 Map of PUBLICA Creative Industries</b></p>	<p>The key should say “Soho Neighbourhood Area”</p>	<p>The Forum will update the map following the examination.</p>
<p><b>(New) Policy 13 / RJ – Three first paragraphs</b></p>	<p>We suggest the three first paragraphs are reorganised as follows:</p> <p>“Street fouling is a continual problem in Soho and appears likely to <del>increase</del><sup>grow</sup> as the number of food and drink related establishments <del>rises</del><sup>increases</sup>. The problem is at its worst late at night when many licensed premises offering such facilities have closed. This <del>p</del>Policy strongly supports development proposals, which include all types of public toilet provision such as pissoirs and pay for use toilets. <u>Westminster City Council’s Licensing Policy Statement indicates the concentration of night-time economy related businesses. These were stated to be 1,304 licensed premises within the West End Cumulative Impact Area in March 2020. The London Plan has a specific policy in relation to the provision of public toilets.</u>”</p>	<p>The Forum proposes the following alternative wording:</p> <p><u>“Street fouling is a continual problem in Soho. Westminster City Council’s Licensing Policy Statement indicates the concentration of night-time economy related businesses. These were stated to be 1,304 licensed premises within the West End Cumulative Impact Area in March 2020 which the neighbourhood area sits within and forms a large part of. The problem is at its worst late at night when many licensed premises are closed. The London Plan has a specific policy in relation to the provision of public toilets and this Neighbourhood Plan policy strongly supports development proposals which include all types of public toilet provision such as pissoirs and pay for use toilets as these contribute to the Plan’s objective of reducing anti-social behaviour within the neighbourhood area.”</u></p>
<p><b>(New) Policy 16B</b></p>	<p>We believe the second sentence of clause B should be deleted as it does not add anything to the policy and could be explained in the RJ.</p>	<p>The Forum wishes to retain this sentence.</p>
<p><b>(New) Policy 16B – RJ / Second, fourth, fifth and sixth paragraphs</b></p>	<p>We suggest these paragraphs are redrafted to clarify the standards. The new paragraph could reference the City Plan 2019-2040 which adopts the NDSS and sets out a maximum home size limit of 200 sqm. There is no need to explain how the policy will be applied and the exceptions, as this is already contained in the City Plan.</p>	<p>The Forum proposes the following alternative wording:</p> <p><u>“The City Plan 2019-2040 expresses the need for affordable family sized homes across the City subject to a maximum space standard of 200 sqm and that 25% of the homes provided should be family sized with between 3 and 5 bedrooms. However, there is no local area differentiation to reflect location, urban fabric or character.</u></p> <p><u>Within the Soho neighbourhood area space is at a premium and should wherever possible be</u></p>



		<p>used effectively to provide homes and particularly smaller homes. Given the cost and scarcity of land for housing it underlines the need for land to be used effectively for this use. In support of this approach the Publication London Plan states in Policy D6 Para 3.6.2 that “Boroughs are ... encouraged to resist dwellings with floor areas significantly above those set out in Table 3.1 for the number of bedspaces they contain due to the level of housing need and the need to make efficient use of land.” The Forum agrees with this approach and notes that Table 3.1 of the London Plan states that the minimum gross internal floor areas for all types of 1 and 2 bed dwellings are significantly below the City Council’s limit of 200sqm (which applies to all homes) and is substantially in excess of the Nationally Described Space Standards for even the largest homes.</p> <p>An independent Housing Needs Assessment was carried out for the Soho Neighbourhood Forum area in 2018 by AECOM59; it forms part of this Plan’s evidence base. This study was specifically tailored to examine Soho’s household composition, trends and forecasts and thus is a targeted evidence source. In its housing needs assessment, it demonstrated demand for all sized homes and particularly small homes. Therefore, if recent trends of one person households and couples with no children living in Soho are to continue, there will be a much greater need for effectively sized 1 and 2 bedrooms homes in particular.”</p>
<p><b>(New) Policy 19 / RJ – Third paragraph</b></p>	<p>We suggest a reference to the “GLA good practice note” is added.</p>	<p>The Forum highlights that the practice note is named and referenced at the end of that paragraph but have proposed inserting the words ‘referenced below’ after the words ‘GLA good practice note’.</p>

<b>Figure 6 Map showing Ramillies Place and Dufour's Place</b>	The map should be updated to include the three existing open spaces at Soho Square, Golden Square and St. Anne's Churchyard.	The Forum will update the map following the examination.
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## Appendix 3 – Schedule of changes to the draft plan proposed by the Soho Neighbourhood Forum

### How to read this section:

- Proposed changes agreed between the Soho Neighbourhood Forum and Westminster City Council are marked in red. The following format has been used to denote the modifications:
    - **Underlined bold red text** = new text proposed compared to submission version
    - ~~Strikethrough red text~~ = text proposed for removal compared to submission version
  - Not included Sections 9 and onwards as these have not been altered.
- Please note all the references and footnotes have not been incorporated into this document.

## 1 Executive Summary

### IntroductionIn brief

- The Soho Neighbourhood Forum (SNF) uses the powers created by the Localism Act 2011 to give people living and working in an area the right to draw up their own plan **for their area**.
- The Soho Neighbourhood Area (SNA) was designated on 5th April 2013.
- The SNF was designated on **25th** July 2014 as a business Neighbourhood Forum, which is led by a Forum Steering Group (FSG) represented by an equal mix of residents and businesses.
- Soho is a very diverse and intensively used neighbourhood area with many competing interests. The FSG agreed a vision for the Forum to work towards. It also agreed to approach its development in a 'bottom up' manner:
  1. The FSG first consulted the local community to identify what residents, workers and visitors felt the key issues to be
  2. Objectives and aspirations were then devised to address the key issues
  3. At regular periods the FSG consulted a wider range of stakeholders to understand and ensure the aspirations were widely supported, gauge levels of support and **consider** detailed **comments-views**
  4. The FSG proceeded to develop detailed policy work built upon the foundations of the community's views.

A number of ideas ~~were put~~**ame** forward during the process, which cannot be taken **into** ~~account~~**forward** in the neighbourhood plan because they are not land use planning matters. However, the FSG has produced a non-statutory (i.e. not legally binding) set of recommendations and projects to capture these ideas and concerns. It presents **sed** them as part of ~~this~~**the** consultation and plan making process to a range of bodies including Westminster City Council and Transport for London with the request that they respond to them and act on them. These recommendations outline suggested approaches to help achieve the ~~overall~~ **FForum's overall** vision for Soho.

## 2 What does the Plan contain?

The ~~P~~**p**lan contains five key sections that outline a series of policies, gives reasoned justification and quotes or ~~provides references to~~ **gives** evidence **which** supports the policy. The five key sections ~~are~~**include**:

- 1 Culture and Heritage
- 2 Commercial Activity
- 3 Entertainment and the Night-Time Economy
- 4 Housing
- 5 Environment

## Summary of Policies

### 1 Culture and Heritage

Given the historic nature of the **neighbourhood** area, proposals for tall buildings will not generally be supported. Development proposals must respect the predominant size and scale of the **Conservation Area**. Proposals must respect the surrounding townscape and building heights, the individual building by building plot widths and scale of the buildings they replace and, where possible, retain a traditional mix of occupiers. Rear yards, courts, back street and mews should be protected and enhanced. Design should avoid creating bland and repetitive facades.

### 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. Large floor plate office developments for single occupation are not **normally** regarded as suitable developments to be supported. Ground floors should avoid creating wasted and underused space and be well designed to increase diversity, vibrancy and activity.

Lettable space in commercial and mixed-use developments which is designed as workspace for the creative industries is strongly supported. ~~These~~ Existing private members clubs which ~~can demonstrate that they~~ provide important places for business networking will be protected and new proposals may be supported.

### 3 Entertainment and the Night-Time Economy

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. New **Class E and some sui generis A1 cafes, A3, A4, A5 and D2** uses above, below or adjacent to existing residential use must apply the 'agent of change' principle and demonstrate that they will not have adverse impacts on residential amenity, which cannot be mitigated. Proposals that provide additional public toilet capacity will be strongly supported.

### 4 Housing

~~Where a~~ Affordable housing ~~should be~~ **cannot be** provided as part of new development, ~~it will be or if not on-site then normally provided~~ within the SNA. ~~For a~~ New residential development **will be car free other than for disabled persons**, ~~the only on-site/on-street parking permit provision made will be for disabled users~~. Housing provision should focus on providing smaller units and no overly large flats will be supported. Major developments ~~must~~ **should show by documents such as** Construction Management Plans (CMP) and Delivery Service Plans (DSP) ~~to show~~ that they have avoided or mitigated adverse impacts and positively enhanced amenity as well as the environment.

### 5 Environment

Applicants should maximise measures that contribute to sustainable development by improving air quality and reduce reliance on the use of fossil fuels. Proposals that waste heat and energy and cause carbon emissions should be avoided. Measures to retrofit and improve the sustainability of existing buildings and reduce their emissions will normally be strongly supported. **Any development** ~~Proposals~~ **to provide last mile and micro consolidation centres will be supported and will be strongly supported for all or part** ~~for of~~ the public car parks at Brewer Street and Poland Street ~~should consider and evaluate the potential for adaption and reuse for all or part of the buildings as micro-consolidation centres~~.

The creation of new green 'pocket parks' on roofs for employees, **residents and visitors** to use will normally be supported provided a robust Management Plan is in place to mitigate any potential adverse impacts such as noise nuisance. Development proposals should provide ~~the highest feasible levels~~ of greening. The Soho Neighbourhood Plan ~~SNP~~ **supports improvements to existing open spaces and** indicates that two areas at Ramillies Street/Place and Dufour's Place could provide useful additions to public space. All applicants within the SNA are also encouraged to use every opportunity to provide public seating whenever possible and practicable as part of their development.

All development proposals should adopt the Mayor's Healthy Streets Approach and be designed in such a way as to facilitate pedestrian movement. Development that provides carefully considered new public access to improve pedestrian connectivity and convenience will normally be supported.

Facades and entrances to premises must display clearly a street number for each premises to facilitate better 'way-finding'. Major developments will be expected, where practical, to provide additional on street cycle stands in the immediate vicinity of the development for use by cycle visitors to the building.

Waste and servicing facilities must provide for off-street waste and recycling facilities within the boundary of the development and not obstruct pavements with dumped rubbish bags. Major commercial developments **are encouraged to should** additionally provide extra waste and recycling storage capacity for neighbouring small commercial units ~~within a 100 metre radius. This should be strictly controlled by suitable technology to weigh and record waste materials, levy appropriate fees and prevent unauthorized access.~~ The provision or retailing of food and drink should store food waste as a separate category and use a food waste recycling service.

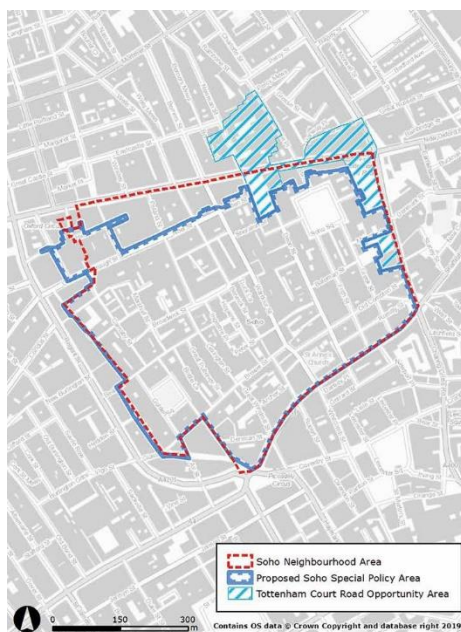
### **3 Introduction**

This is the first **n**Neighbourhood **p**Plan for Soho. It is **first and** a real opportunity for residents and workers, whilst also taking account of the views of visitors, to begin to shape their own **neighbourhood** area. The SNA was designated by Westminster City Council (WCC) on 5th April 2013. The designated area is shown by the red line on the map below (Figure 1).

The SNF was designated as a **b**Business Neighbourhood Forum for a five-year term by WCC on **25th** July 2014, to give Soho the opportunity to draw up its own **p**Plan for the **neighbourhood** area. The Soho Neighbourhood Forum **wh**as **been** re-designated for a further five-year term on 24th September 2019.

The SNF has prepared the Soho Neighbourhood Plan based on the views of local people. These views are succinctly described in the Forum's vision of what Soho is and what it can be in the future. This **p**Plan sets out how that vision can be achieved through planning policies which control land use and development up to 2040. This end date has been chosen as it marks the end of the draft Westminster **LocalCity** Plan 2019-2040. The **p**Plan **is beinghas been** prepared in accordance with the Town & Country Planning Act 1990, the Planning and Compulsory Purchase Act of 2004, the Localism Act 2011 and the neighbourhood Planning Regulations 2012 (as amended).

**Figure 1 Map of Soho Neighbourhood Area designated area**



The current London Plan was adopted in 2016. The **Publication new draft** London Plan has now been through its examination in public and is expected to be published during the winter of

2019/20/2021. The new Westminster City Plan 2019-2040 (~~the City Plan~~) will replace the ~~Local City Plan 2016~~ and a number of 'saved' policies in the Westminster Unitary Development Plan (UDP) 2007 and these documents will cease to form part of ~~the Development plan for Westminster's Development Plan~~.

The National Planning Policy Framework (NPPF) February 2019 provides the general principles for 'sustainable development' across the country. All plans have to be in general conformity with the NPPF and this includes the London Plan and Westminster City Council's ~~Local City Plan~~. The Soho Neighbourhood Plan has been prepared to be in general conformity with the NPPF and these strategic planning documents.

### The Plan Period

This ~~pPlan~~ has been prepared to cover the period from 2019 to 2040, taking account of the existing strategic policies in the ~~adopted~~ London Plan and the adopted Westminster City Plan 2016, together with those in the ~~Publication emerging new Intend to Publish~~ London Plan and the new Westminster City Plan 2019-2040.

The ~~pPlan~~ will be reviewed on a regular basis during the ~~pPlan~~ period to take account of any future changes to national policy and Westminster City Council strategic policies.

### How to read the Plan

The Soho Neighbourhood Plan starts by ~~describing the Soho Neighbourhood Area at the commencement of the plan. It goes on to~~ setting out the SNF's vision for Soho. It sets out the ~~8~~ objectives for the ~~pPlan~~. These ~~objectives~~ were derived from ~~the~~ public consultation ~~which had identified and~~ 19 individual aspirations and objectives. ~~These~~, including the percentage levels of the support expressed for each ~~of them~~, areas described in the ~~plan's~~ Consultation Statement. ~~It briefly describes Soho as it is today and then the range of~~ ~~The~~ policies developed to achieve the objectives ~~are~~ grouped into five distinct sections. They are Culture and Heritage; Commercial Activity; Entertainment and Night-Time Economy; Housing and Environment. These planning policies together ~~with the non-statutory recommendations~~ seek to achieve the ~~F~~forum's vision.

Each section sets out in supporting text the reasoning and justification for the planning policies. The ~~reasoning~~ ~~justification~~ describes the need for and purpose of the policy. ~~It includes, where relevant, a description of what a set of policies together seeks to achieve.~~ It provides, or provides references to, the relevant evidence that underpins the reasoning to show the policy to be soundly based. ~~Where relevant, there is a description of what a set of policies together seeks to achieve.~~

*Policies are numbered and presented in blue, like this. It is these policies against which planning applications will be assessed once the ~~pPlan~~ comes into force. It is advisable that in order to understand the full context for any policy it is read in conjunction with the supporting text.*

Once adopted, ~~the~~ Soho Neighbourhood Plan will form part of the ~~development plan for~~ Westminster Westminster's ~~Development Plan~~ which will include the ~~Local City Plan 2019-2040 (the local plan)~~ and the London Plan and any other adopted neighbourhood plans. These are the policies that applicants must have regard to in preparing their planning applications.

There is a **Glossary** to explain acronyms and technical terms. This is followed by the **Evidence Base**, which contains or provides links to all the surveys, reports, references and appendices used to create and justify the policies of the ~~pPlan~~. The Evidence Base also includes the details of reference documents where these are not available online.

In addition to the ~~pPlan~~'s policies there is a further but separate document, which contains Soho Neighbourhood Forum's **Recommendations and Projects**. These set out a series of non-statutory recommended actions that, while not land use planning policies, are specific recommendations to Westminster City Council and other bodies to complement the statutory policies and help realise the ~~Forum's~~ vision for Soho. In particular, they respond to and give voice to the issues raised during the public engagement process.

Good and effective public engagement brings forward a wide range of views about a ~~a~~ ~~neighbourhood~~ area. Those living and working in the local community may not always realise what is, or is not, land use planning and what can properly fit within a statutory neighbourhood plan. It

would betray the whole process of public engagement, which has been a key part of our 'bottom up' approach to making this **pPlan**, if those views and ideas once raised were simply ignored and not put forward.

These **R**ecommendations are important. We urge the bodies to whom they are addressed to consider and adopt them.

## **4 The Neighbourhood Area – Soho today**

### **The Strategic and Planning context**

The London Plan designates the central area of London, which contains its principal concentration of business, commercial, leisure, capital city and world city functions as a Central Activities Zone (CAZ). Soho is a core location within the CAZ and contains many of these uses as well as residential and local business uses. The Westminster City Plan 2016 designated the central part of Westminster as the Core CAZ because of the intensity of use and range of activities that take place within it. In order to protect and encourage certain uses the **cCouncil** has designated in its **draft LocalCity** Plan 2019-2040 five Special Policy Areas, including a Soho Special Policy Area. Part of Soho is also designated as being within the Tottenham Court Road Opportunity Area (TCROA), which also includes parts of London Borough of Camden. The **pPlan** supports the indicative targets for the TCROA but notes that Westminster City 2016 Plan states that because of its position within historic areas, development within the opportunity area will respect the prevailing building heights of the surrounding area. Soho also lies within the **Council's** West End Retail and Leisure Special Policy Area, (WERLSPA) which aims to protect, enhance and promote retail and leisure with better transport and pedestrian linkages.

### **A brief History of Soho**

The 1966 Greater London Council Survey of London describes the parish of St Anne as *"the most famous of London's cosmopolitan quarters. Widespread building development was taking place in this area in the 1670's and 1680's and when Louis XIV revoked the Edict of Nantes in 1685 large numbers of Huguenot refugees began to settle here. This foreign element has been periodically replenished by new immigrants, particularly in the latter part of the nineteenth century. Soho is now famous, amongst other things, for its good food..."*

The Soho Conservation Area was first designated in 1969 and extended in 1976, 1979, 1983, 1990 and 2005. In the last revision, the area south of Shaftesbury Avenue became the separate Chinatown Conservation Area. The 2005 audit was then adopted as Supplementary Planning Guidance and still applies. Paragraphs 4.1 and 4.3 of the audit states:

*"Soho is London's most central village, with narrow streets and alleyways, restaurants, cafes and food shops, small businesses and street markets intermingled with many surviving eighteenth century houses. It's multiple layers of history and varied street life makes Soho's streets both fascinating and lively. Yet it is also a strongly residential area, with a growing residential population. The important residential element to Soho's character prevents it from appearing entirely commercial."*

*"Soho today remains one of London's most colourful and vibrant neighbourhoods. Its character is defined not just through its built form but by its many and varied uses and residents and the diversity of communities which occupy its spaces."*

### **Working in Soho**

According to the 2018 West End Ward Profile compiled by Westminster City Council, the ward was home to 216,225 jobs provided by 19,767 businesses. It is difficult to get accurate figures for Soho on its own but as it is a commercially and intensively used part of the three areas that make up the ward: (Mayfair, Fitzrovia and Soho); the numbers are likely to be at least a third of those totals. It is also the most economically productive Westminster ward with a gross value added of approximately £19 billion.

Most of those in the approximately 71,000 jobs in Soho commute in from elsewhere in London and the South East. Whilst there are a wide range of business sectors and niche businesses there are some clearly established sectors. One of the varied uses referred to by the Conservation Area Audit was the emergence in the mid twentieth century of a cluster of headquarters for the cinema

industry based in and around Wardour Street. From this a variety of creative, advertising and media clusters followed and largely remain including film editing and post-production. The proximity to Saville Row has ensured a range of cutting rooms and tailors, both supporting that street whilst growing its own styles and outlets. Carnaby Street, the centre of fashion in the 1960's and 70's, is now a thriving, diverse area for fashion, eating and leisure.

Food, beverage, entertainment and hospitality are world renowned parts of Soho. The area's theatres, restaurants, bars, music venues, members clubs and also the markets on Rupert Street and Berwick Street, create an attractive offer to residents, workers and visitors and provide high levels of employment. In addition, the professional, scientific, technical, financial and insurance sectors coupled with general business administration and support are all represented in the SNA.

Soho has always been a home of start-ups and small and medium sized enterprises (SMEs), which are crucial to ensuring, continued creativity across all sectors, but rising business rates and rents with a large number of business leases having 'upward only' rent review clauses may have made this more challenging to sustain for some businesses when the market flattens or dips. However, according to the 2018 West End Ward Profile referred to above, the West End is the most economically active ward in Westminster, ~~and the~~ Wward Pprofile indicates that 1,315 people were employed in new start-ups in the ward in 2016 as compared with the 562 in the next most economically active ward, the neighbouring St James's ward.

### **Living in Soho**

Although originally built as a primarily residential area, Soho is now typified by mixed use. Living accommodation, much of it privately rented, is mainly found on the upper floors above commercially used basement, ground floor and sometimes commercial upper floors. According to the Ward Profile it accounts for 47% of all homes. In addition, there are three high-rise blocks of accommodation managed by City West Homes in Kemp House, Ingestre Court and Blake House. 23% of homes are in social housing and are in many locations, from a range of providers but principally Soho Housing Association. 4% of homes are owned and are very highly priced with the Wward Pprofile stating that a person on the median income for the ward would have to pay 38.7 times their annual salary to purchase a median priced home in the ward. In terms of household sizes, the ward profile states that 56% are single person households, 29% 2 person, 8% 3 person and 4% 4 person households.

Living alongside a wide ranging and active business community with many parts of it working 24/7, places a number of stresses on the health and wellbeing of residents and noise nuisance is a constant complaint.

### **Visiting, Shopping and Leisure in Soho**

Soho's iconic name was originally a hunting cry later taken up by the Duke of Monmouth a famous Soho resident during his ill-fated rebellion ending at the battle of Sedgemoor. History and famous people play an important part in Soho's attractiveness to visitors and the mural at the west end of Broadwick Street and the many plaques around the area are a regular haunt for guided tourist groups. The distinctive layout and its architecture add to Soho's character as well, as embodied by its many listed buildings and Conservation Area status. Visitors come also for an indefinable and constantly changing vibe, a sort of 'spirit of Soho'. That comes in part from the hint of the former predominance of sex related uses and relaxed attitudes to sexual orientation, as well as the café culture and cuisine, the theatres and the noticeable variety of people on the streets. On average, according to Westminster City Council, 260,000 visit the West End ward every day. Over a third of visits are on foot and that percentage continues to increase. As Soho's profile continues to rise, it is becoming home to an increasing number of hotels, which although they support the visitor economy and provide jobs tend to displace some of the very mixed uses which give the neighbourhood area its character.

Soho has an unparalleled, diverse and well-supported evening economy based around theatres, cinemas, restaurants and bars, diversified by jazz and music venues, private - members clubs, cabaret and nightclubs. This evening economy ~~is~~ includes later working office staff, networking, socialising, eating, drinking, gym and sports facilities as well as the arts such as music, cinema and theatre. This continues after midnight to become a night-time economy with greater emphasis on drinking and socialising with some ongoing provision for music, dancing and food but which has more problematic anti- social behaviour elements for residents and some neighbours with an



increasing emphasis on the over consumption of alcohol and drug taking.

### **Accessibility and Environment in Soho**

Soho has well known and busy boundary roads with Shaftesbury Avenue, Charing Cross Road, Oxford Street and Regent Street, although the latter is just outside the boundary of the Soho Neighbourhood Area (SNA) as it sits within the Mayfair Neighbourhood Area. Within Soho streets are narrow, pavements often narrower still, with high levels of traffic congestion in many streets, which pose difficulties in making deliveries and receiving collections. Air quality is generally amongst the worst in London. The arrival of the Elizabeth **L**ine and potentially Crossrail 2 will enhance accessibility with new stations at Bond Street to the west and Tottenham Court Road in the north east of the SNA but will also further increase pedestrian flows and congestion of the public realm.

All parts of Soho are developed so there is pressure to intensify activity by redevelopment or refurbishment to provide larger and often more economically valuable space. However, this often displaces existing businesses and when a number of schemes take place at the same time it causes substantial disruption during the development phase. Schemes, unless very well-designed and set back at higher levels, can lead to a sense of 'canyonisation' in the narrower streets. The provision of additional storeys as part of new development by being substantially taller than the predominant scale of the **C**onservation **A**rea can undermine the **neighbourhood** area's character. There are also well-documented deficits in play space, green space and nature and the London Heat Map indicates that wasted heat and carbon emissions are high.

## **5 Our Vision for Soho**

The vision, which was adopted by the Forum Steering Group, has been used to guide the approach to making the Soho Neighbourhood Plan.

*The Soho Neighbourhood Area is and will continue to be a unique and important part of London with a rich and vibrant heritage. This **p**Plan will support sustainable development, which reinforces Soho's reputation for creativity, diversity and tolerance. These characteristics are demonstrated in many ways, for example: through the range of businesses, from sole trader to multiples and household names; through its varied and strong residential communities and through its diverse cultural and entertainment offer. The **p**Plan will protect this diverse mix and also enable growth, which sustainably enhances what is already a complexly developed **neighbourhood** area.*

## **6 The Objectives for the Plan**

The initial working parties after the inauguration of the Soho Neighbourhood Forum set out what they felt to be the key issues facing Soho. These were later endorsed in the 2016 summer key issues survey which received 993 responses. The Forum then set out a series of 19 aspirations and in 2017 a stakeholder survey tested if they were widely supported across the local community. They were strongly supported by the 542 stakeholder responses and more than 3,000 individual comments which can be accessed in the Consultation Statement. From these aspirations the following overarching **p**Plan objectives were derived.

1. To preserve, enhance, and promote the heritage and culture of Soho to keep its underlying spirit.
2. To support and enhance the range and diversity of businesses in Soho particularly the creative industries and other business clusters by ensuring that there continues to be a continuing supply of flexibly sized accommodation.
3. To support investment which respects the nature of the **C**onservation **A**rea, generally retaining its character and human scale.
4. To support the continued local **provision** of live music venues in the **neighbourhood** area and ensure good management in all forms of entertainment, leisure and cultural activity which minimises any adverse impacts on residents and other users.
5. To recognise the demand for, and to support, growth in the residential community by seeking to ensure that the housing required by WCC is located within Soho wherever possible with an appropriately sized mix of units and to enhance the attractiveness of the **neighbourhood** area for residents by reducing nuisance, noise, crime and anti-social behaviour.

6. To promote sustainable development, improve air quality, increase green infrastructure and improve the public realm.
7. To support a modal shift towards walking and cycling, promote car free living and freight consolidation to help reduce traffic and congestion.
8. To reduce the amounts waste left on the street by encouraging better facilities for recycling and waste management within premises and supporting the increased provision of dedicated food waste recycling.

## **7 The Plan Policies**

### **Section 1 CULTURE AND HERITAGE**

#### **Policy 1: ~~Development Proposals in the Soho Conservation Area~~ Heritage and Local Character**

- A.** Proposals will be supported ~~for development~~ which **respect**, protect, ~~respect~~ and enhance the character of the Soho Conservation Area **particularly** in terms of their size and scale ~~will be supported~~.
- B.** Public rear yards, courts, back streets and mews ~~all contribute to the distinctive local character of Soho and should be protected and enhanced as part of development proposals. Links to Plan Objective 1.~~ **will be protected where they contribute to the distinctive local character of Soho. Development proposals should enhance these features, particularly through increased public usage.**
- C. Proposals will have particular regard to:**
- a. Reflecting the prevailing character, building heights and townscape of the site and surrounding area such as the individual ‘building by building’ plots widths and scale of the buildings they replace in order to complement the existing architectural character.**
  - b. The importance of good design within the massing and scale proposed to avoid creating a uniform design, either at street level or on upper floors.**
  - c. The materials and detailing of facades in order to respond to Soho’s distinctive architecture and mix of styles.**

#### **Reasoned justification**

~~This policy~~ **Links to Neighbourhood Plan Objectives 1, 2 and 3.**

Soho is known globally as an entertainment and creative hub, with distinctive architecture, narrow streets, a proliferation of small independent businesses and individual shop fronts. It is also one of London’s important **C**onservation **A**reas given its location and diverse cultural and architectural heritage.

The highest density of blue plaques for an area in London are to be found in Soho. There are 226 ~~heritage assets including~~ listed buildings **and many other heritage assets can be found throughout** the Soho Neighbourhood Area. **In addition, there are many unlisted buildings of merit and Soho is an Area of Archaeological Priority.**

The heritage of Soho is reflective of the waves of immigration that have passed through from the Huguenots to the Italians, which is still evident in cafes like Bar Italia, the fashion scene that continues to play a role and the creative industries that are vital to the UK economy. Soho has also always been a place where new attitudes to sexuality have developed and the current LGBTQ+ community reflects this today.

~~The heritage of Soho is reflective of the waves of immigration that have passed through from the Huguenots to the Italians, which is still evident in cafes like Bar Italia, the fashion scene that continues to play a role and the creative industries that are vital to the UK economy. Soho has also always been a place where new attitudes to sexuality have developed and the current LGBTQ+ community reflects this today.~~ **Soho’s This heritage can be assessed by reference to the Soho Conservation Area**

Audit and is displayed through the built fabric of Soho. According to the Heritage and Character Assessment carried out for the Forum by AECOM the 'original architectural features such as timber sash windows, timber or metal casement windows, panelled doors, decorative stucco, moulded window surrounds and door cases and historic shopfronts should be maintained and repaired wherever possible'. It is also displayed by "the diversity of peoples and activities which have made the area their home. This has resulted in a mix of domestic, commercial, retail, industrial, creative and leisure building uses. This existing culture and heritage also make the neighbourhood area an attractive one for employers to attract and retain staff.

**Both the audit and the AECOM study provide useful guides as to how development proposals can contribute to the neighbourhood area's character.**

Besides the well-known and sometimes famous streets, Soho contains a wide range of backstreets, courts, rear yards and mews. These have sometimes been used to locate added-on infrastructure such as air conditioning plant or as a location for waste bins and the façades poorly maintained. Policy 5 requires that the small backstreets, public rear yards, 'cul-de-sacs' and mews are places that can be enhanced as part of development and should properly considered.

The Soho Neighbourhood Area is also largely covered by the Soho Conservation Area (Figure 2).

**The policy requires redevelopment and substantial refurbishment proposals to respect the pre-existing plot widths and relate to the height and scale of the immediate vicinity in order to respond to the heritage and character that surrounds it and create development that is harmonious with it. The more varied the size of spaces on offer, which will be achieved by adopting this approach, the greater the likelihood of continuing a diverse mix of occupiers by size and type.**

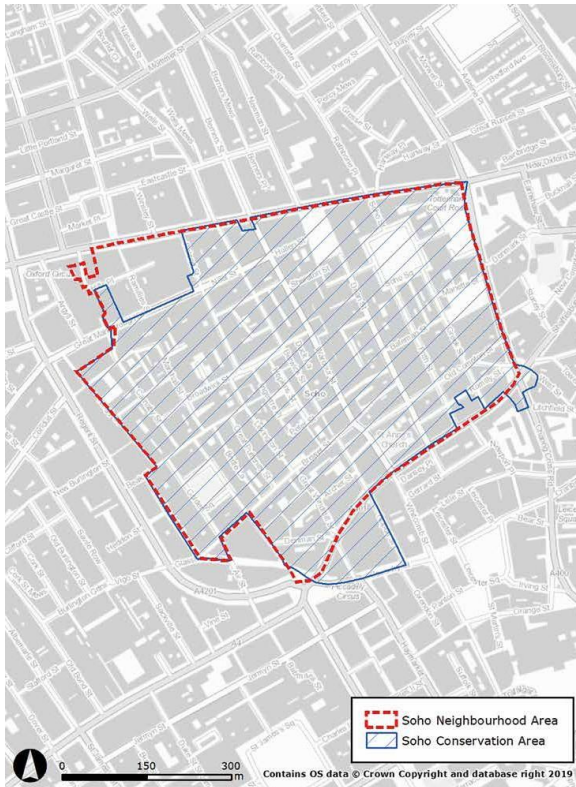
**Soho is a profoundly mixed-use neighbourhood area with differing uses existing, above, below and beside one another. It is this that gives it a large part of its charm and attractiveness not only to visitors but to the businesses, which seek to locate here. Evidence shows that this mixed-use nature and variety of styles and sizes of commercial space has not inhibited achieving a particularly high level of employment. While all new proposals will need to be constructed to achieve high levels of sustainability, those which recognise that diversity in size, scale and plot widths supports and enhances Soho's character will be welcomed and supported.**

Besides the well-known and sometimes famous streets, Soho also contains a wide range of backstreets, courts, rear yards and mews. These have sometimes been used to locate added on infrastructure such as air conditioning plant or as a location for waste bins and the façades poorly maintained. The policy requires that the small backstreets, public rear yards, 'cul-de-sacs' and mews are places that can be enhanced as part of development and should be properly considered.

**In recent decades, facades have tended to become more uniform through over- use of plate glass and applied panels. As the AECOM Soho Heritage and Character Assessment notes, business owners should be encouraged to employ vibrant shopfronts or building façades on key streets (e.g. Carnaby Street), while employing a style and form that is responsive to the historic fabric of the neighbourhood area. This will maintain and enhance the interest and distinctive character of the neighbourhood area, without subduing the back-street quality.<sup>20</sup>**

**The Soho Neighbourhood Area is also largely covered by the Soho Conservation Area which is also contiguous to a number of other conservation areas. (Figure 2).**

**Figure 2 Map of Soho Conservation Area**



This Conservation Area status is important in recognising and seeking to protect Soho's character. The predominant building scale, as described in the AECOM Heritage and Character Assessment, "rarely exceeds 4 storeys barring an additional storey within a mansard" and the introduction of development substantially taller than five storeys would "erode the intimate historic character of the area". This is backed up by the 2014 Soho Public Realm Study, which noted "the predominant character of Soho's streets is created by smaller buildings, varied uses, shops, offices, cafes, restaurants, and bars at ground floor as well as a number of residential units".

Maintaining Soho's existing size and scale came through as a clear and consistent priority in the public consultation that has led to the drawing up of this Plan. The draft City Plan 2019-2040 contains a welcome Soho Special Policy Area (SSPA) setting out the development and uses it feels to be appropriate within it.

## **Policy 2 Proposals for increased building height tall buildings**

**A.** In recognition of the sensitivity of the historic and lower scale environment of Soho tall buildings including the alteration of existing tall **Proposals for tall** buildings will not be permitted where they would have **an adverse harmful** impacts on any of the following:

- a. **The settings of, including views from,** Golden Square, Soho Square and St Anne's Gardens;
- b. **The significance of o**ther heritage assets including listed buildings or **unlisted buildings** local buildings or structures of merit.;
- c. The 3 strategic views as indicated in Figure 3.

**B.** Proposals for **additional storeys infill development of more than 2 storeys** may be permitted where **the resulting they respect the surrounding building heights responds to and respects prevailing context heights.** **Links to Plan Objectives 1 and 3**

**Reasoned justification**

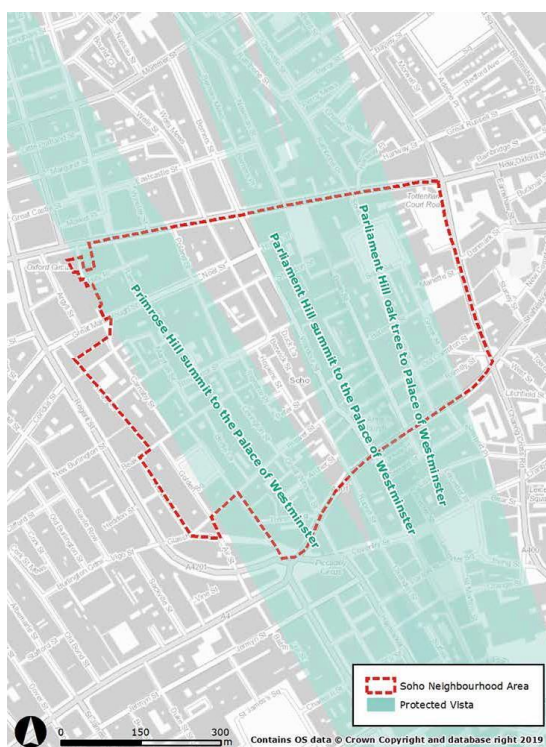
**Links to Neighbourhood Plan Objectives 1 and 3.**

**The City Plan 2019-40 has identified Soho as an area which is not generally suitable for tall**

~~buildings. Tall buildings are defined in the draft Local Plan as those buildings that are more than twice the prevailing context height or over 30 metres whichever is the lower. Within Soho the prevailing context height was defined in the AEGOM Heritage and Character Assessment as being four storeys. This policy seeks to The policy supports the City Plan's approach by generally preventing tall buildings as these would erode the culture, heritage and architectural character of the neighbourhood area. Such buildings would also risk damage to the setting of its 3 public open spaces and the setting of its many listed buildings and unlisted buildings of merit.~~

While there are three residential tower blocks originally constructed to provide local authority housing at Blake House, Kemp House and Ingestre Court, these should be regarded as exceptional as they break the protected views but were built on post war, bomb damaged sites when providing additional housing was a high priority. They should not be used as a precedent within the Conservation Area for new buildings in the vicinity of a similar height. Both the London Plan and Westminster's City Plan Council plans indicate three protected views that cross Soho that development must adhere to and protect (Figure 3).

**Figure 3 Protected views across Soho**



### Policy 3: Maintaining Local Character

~~Development proposals should reflect prevailing character, building heights and townscape of the site and surrounding area such as the individual 'building by building' plot widths and scale of the buildings they replace in order to complement the existing architectural character. It is important that there is innovative design within the massing and scale proposed to avoid creating a bland or uniform design, either at street level or on upper floors. Links to Plan Objectives 2 and 3~~

#### Reasoned justification

~~This policy requires redevelopment and substantial refurbishment proposals to respect the pre-existing plot widths and relate to the height and scale of the immediate vicinity in order to respect the heritage and character that surrounds it and create development that is harmonious with it. The more varied the size of spaces on offer, which will be achieved by adopting this approach, the greater the likelihood of continuing a diverse mix of occupiers by size and type.~~

~~Soho is a profoundly mixed-use area with differing uses existing, above, below and beside one another and it is this that gives it a large part of its charm and attractiveness not only to visitors but to the businesses, which seek to locate here. Evidence shows that this mixed use nature and variety of~~

~~styles and sizes of commercial space has not inhibited achieving a particularly high level of employment. While all new proposals will need to be constructed to achieve high levels of sustainability, those which recognise that diversity in size, scale and plot widths supports and enhances Soho's character, will be welcomed and supported.~~

~~Façades in recent decades have tended to become more uniform through over-use of plate glass and applied panels. If used in Soho these lack detail, which means they will contribute little to the area's character and interest. Adding detail or referencing relevant local heritage or a cultural feature are likely to make new facades more interesting when viewed from the street. As the AECOM Soho Heritage and Character Assessment notes, business owners should be encouraged to employ colourful shopfronts or building façades on key streets (e.g. Carnaby Street), while employing a style and form that is responsive to the historic fabric of the area. This will maintain and enhance the interest and distinctive character of the area, without subduing the back-street quality.~~

### **Policy 34 Mixed-Use Developments**

~~Proposals for mixed-use developments which include a mix of occupiers, (such as residential, retail, light industrial, office, and restaurant) and fully apply the 'agent of change' principle as defined in the London Plan will be strongly supported. Links to Plan Objective 2 **will be strongly supported where they:**~~

- ~~**A. Include an appropriate mix of residential and commercial uses, and**~~
- ~~**B. Fully apply the 'agent of change' principle as defined in the London Plan.**~~

#### **Reasoned justification**

##### **Links to Neighbourhood Plan Objective 2.**

This policy aims to maintain and enhance the vibrant mix of architecture and businesses that gives Soho its character and human scale. Development that seeks to accommodate a mixture of **residential and business-commercial uses and** occupiers by size and type will be supported. These mixed-use and small-scale buildings are essential to retain both the tangible and intangible aspects of Soho's heritage and spirit/brand, which "has a unique role to play within the wider west End". While the difficulty in identifying an intangible concept such as the 'Spirit of Soho' is recognised, what is clear is that this intangible factor is an important part of the **neighbourhood** area's charm and allure. It has and is being eroded by large scale modern development, such as ~~that~~ on Broadwick Street, and should be preserved in order to keep Soho as a unique cultural and entertainment area for future generations.

Suitable **business-commercial** sectors and activities that might fit with this policy include but are not limited to:

- A diverse range of independent restaurants;
- Specialist food retailing and the street markets;
- Businesses related to the music industry, (such as sheet music and vinyl record shops);
- Specialist clothing, tailoring and fabric shops;
- TV and film post-production and advertising;
- Theatre production, galleries and other cultural uses;
- Communications, PR and marketing; **and**
- Shops that provide services for residents and enhance residential amenity.

### **Policy 45 Shop Front and FacadesGround Floor Frontages**

- A.** Where **major** development involves creating **a number of** new street facing facades developers ~~should be required to~~ avoid creating uniform shop front and repeated facades **to maintain a diversity of frontages which positively contribute to Soho's character** ~~which detract from local character.~~

- B.** Opportunities to add **appropriate** detail and colour which increases interest and character as suggested in the AECOM Heritage and Character Assessment will be supported. ~~Links to Plan Objective 3.~~

### Reasoned justification

#### Links to Neighbourhood Plan Objective 3.

The predominant character of Soho is one of individual shops and other uses each with its own approach to style and branding. In order to avoid eroding Soho's individual style and character the introduction of corporate and repetitive **facades and** shop fronts should be avoided. ~~and~~ This ~~Policy requires an emphasis on~~ **emphasizes the need for** individual style, design, colour and branding. As AECOM's Soho Heritage and Character Assessment notes "Long, continuous facades are out of scale and do not reflect the pattern of smaller, narrow buildings which give rise to mix of uses characteristic of Soho".

Proposals that ensure shop frontages maintain a mix of sizes and designs will be supported to maintain and enhance the character of the Conservation Area. Where the proposal includes creating or replacing a number of shop fronts consecutively, each should have its own design and character and avoid creating a repetitive bland uniformity of design.

## **SECTION 2 COMMERCIAL ACTIVITY**

### **2.1 Commercial Activity**

#### **Policy 56: Premises for Small Businesses**

Proposals for major **commercial** development will be supported where ~~they commercial or mixed-use development proposals~~ demonstrate that they **incorporate** flexible workspaces suitable for SMEs and other small-scale businesses ~~so that the availability of smaller commercial premises for office and other uses are not lost within the Plan area.~~ ~~Links to Plan Objective 3~~

### Reasoned justification

#### Links to Neighbourhood Plan Objective 3.

Soho is unique in the range and diversity of its businesses and retailers, which, in turn, are a function of its special history and the diverse populations that have made their homes in Soho. These activities, for example, media, communications, hospitality, specialist and independent retail, such as, fashion, fabric, music retail and vinyl stores, distinguish it from many other London villages. **It is important that the availability of smaller commercial premises for office and other Class E uses are maintained within the neighbourhood area.**

Despite its commercial success and high density of employment, early public consultation on the ~~p~~**P**lan revealed that size and scale together with heritage and culture were the key concerns for local people. There was also concern as to the number of chains and gentrification. The ~~p~~**P**lan wishes to retain commercial and creative activity in Soho and enhance Soho as a location and hub for these activities. The ~~p~~**P**lan ensures that growth is carried out within the framework of the current size and scale of the **neighbourhood** area and ~~which~~ builds on existing character, heritage and culture. The SNA is also in large part also a declared Conservation Area.

While the **neighbourhood** area is a popular location for all employers, a development response to this by creating buildings with large floor plate 'corporate' style accommodation risks undermining the very character that makes the **neighbourhood** area attractive. It is the mixture of sizes and diversity of buildings that has played a large part in the creative processes which thrive in Soho. This mix has not inhibited the creation of a higher density of employment levels than anywhere elsewhere in the West End (1,350 jobs per hectare) as demonstrated by a study for London government, GLA and WCC. So rather than providing a barrier to achieving growth, small and varied size office accommodation has helped it to thrive.

#### **Policy 67: New Office Developments**

- A.** Office development proposals should be designed to provide flexibly sized workspaces and accommodate a wide variety of business occupiers, ~~and~~
- B.** ~~L~~arge 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. Links to Plan Objectives 2 and 3~~

### Reasoned justification

#### Links to Neighbourhood Plan Objectives 2 and 3.

New development and extensions to existing properties within the Soho Neighbourhood Area must be designed sympathetically to ~~its~~the overall character. AECOM's Heritage and Character assessment recommends "principles for managing change in this area should focus on sustaining, reinforcing or enhancing those aspects which maintain or enhance the townscape" It is important for Soho's reputation for creativity and innovation that we do not seek to over specify what this character should be over the life of the plan by a design code today that might be unduly restrictive in years to come but the use of good design, colour detail and a respect of the environment and heritage of the local context as suggested by AECOM will be important factors in maintaining Soho's character.

In this policy, the provision of office space in a wide variety of sizes can help to support business and business clusters, such as the film industry, by providing opportunities to relocate and re-size within the neighbourhood area and drive growth of the independent and SME business types, which find the diverse business culture of Soho an attractive place to locate in and recruit staff. As the UK Screen Alliance, noted in a discussion about Soho and the proposed neighbourhood plan "This is a young industry and staff like to be in Soho and central London and like the buzz. There are good travel connections to Soho. Most businesses are very cautious about moving away because of this and because of the benefits of being part of an established cluster. It is important to be part of a critical mass of employees who can, if necessary, move between jobs in the industry as work ebbs and flows".

Development activity tends to look for the highest commercial viability, minimised costs and strong tenant covenant. This often results in providing the largest possible floorplates within the developed or refurbished building. If left unconstrained this activity would progressively reduce the variety of business space on offer within Soho and would generate cumulative adverse impacts on the character and heritage of the plan area.

The AECOM Heritage and Character Assessment suggests that smaller units should be retained, and a wide variety of businesses encouraged. The policy requires proposals for development to support and enhance the range and diversity of businesses within Soho and to do so by providing a supply of flexibly sized office accommodation. It makes clear that large floorplate developments, which tend to be occupied by single occupiers, will only be supported where they are part of a development clearly providing a variety of sized office units. Large floorplate developments such as that at 26-40 Broadwick Street & 10 Livonia Street are out of scale with the predominant character of the Conservation Area.

This development provided 8,043 sqm of office~~B1~~ floor-space over just 6 floors. Developments of this type reduce the diversity of ~~B1~~office space available and can substantially reduce local character. The existence of smaller commercial and retail spaces rather than large floorplates by their nature allow for a greater variety and mix of occupiers within the total space provided. Also, the current small-scale nature of much of what has been provided has proved no barrier to achieving high levels of employment as the Arup comparative study has demonstrated.

### Policy 78: Creating Active Frontages~~Ground Floor Uses~~ in New Commercial Developments

Proposals for new commercial developments will be supported where the ground floor ~~accommodation~~includes active frontages, and~~uses~~ which avoid under used space ~~and accommodation, in order to maintain the vibrancy and diversity of the Plan area. Links to Plan Objectives 2 and 3~~

### Reasoned justification

#### Links to Neighbourhood Plan Objectives 2 and 3.



This policy requires development proposals to avoid wasted or underused **space in order to maintain the vibrancy and diversity of the neighbourhood area**. The AECOM Soho Heritage and Character Assessment notes “the loss of active frontages with removal of commercial and retail units on the ground floor” and “vacant office lobbies on the ground floors of properties reduce active frontages and interest on the street”. The creation of inactive ground floor spaces such as large ground floor reception/lobby areas, which tend to accompany new large floorplate buildings will not be supported as they do not create active frontages and erode the diversity and activity that typifies the **Conservation Area**. Coffee hubs, break out spaces and short-term exhibitions are examples of potential ways to add interest to under used areas.

## **2.2 CREATIVE INDUSTRIES**

Soho is an important location for the creative industries and industry clusters. The short Creative Industries Study by Publica for the Forum highlights the role Soho plays as a location for a wide range of creative industries and as a home for creative talent. This is of important significance to the UK economy.

“Creative industries are the fastest growing sector of the UK economy,” Creative Industries Federation Website. They are defined by the UK Government as “those industries which have their origin in individual creativity, skill and talent and which have a potential for wealth and job creation through the generation and exploitation of intellectual property”.

~~The Policy 16 of the draft Local City~~ Plan 2019-2040 supports and protects existing arts and culture uses and encourages new creative activity.

### **Policy 89: Providing Public Art to Reflect Local Culture and Heritage**

Where development ~~is required to~~ provides public art ~~as a condition of planning permission~~ these should be works of art that reflect the culture and heritage of Soho ~~and wherever possible be created using Soho based creatives. Links to Plan Objectives 1 and 2~~

#### **Reasoned justification**

#### **Links to Neighbourhood Plan Objectives 1 and 2.**

This policy seeks to support creative endeavour in Soho in one important additional way. Where development is required to provide public art as a condition of planning permission these should be works of art that reflect the culture and heritage of Soho and wherever possible be created using Soho based creatives.

### **Policy 940: Providing Accommodation for the Creative Industries**

Proposals ~~for new, which ensure that the lettable space in~~ commercial and mixed-use developments **which incorporate class E floorspace will be strongly supported if they are** ~~is~~ designed to offer a variety of sizes of workspace for the creative industries, **and particularly in cases where they can accommodate** ~~with an emphasis on start-ups, will be strongly supported. Links to Plan Objective 2~~

#### **Reasoned justification**

#### **Links to Neighbourhood Plan Objective 3.**

Soho enjoys a global reputation as a creative hub for film, post-production, digital media, advertising and theatre. “In Soho, established businesses and new players in the creative sector find space, connectivity, communication, infrastructure, networks, cross-overs of people, place and new technologies, enabling work to be created in the city’s heart.”

**Historically Soho has been associated with new trends and innovations across a wide range of industries.** It is the aim of this policy to support and encourage the provision of space for creative sector growth and to recognise the sector for both economic and cultural reasons. “London’s creative industries are concentrated at its centre, the West End is the district with the highest concentration of creative workers, and Soho is the neighbourhood at the very heart of this.” (see figure 4) Proposals can, in the way that internal space is laid out, ensure that access, common facilities and the way spaces are divided up allow them to be used by a variety of occupiers.

Although it is recognised that neighbouring areas in London have creative clusters, Soho is unique in its representation of the range of creative industries, in both their diversity and concentration. Creative Industry usage is inherent and spread evenly throughout Soho.

### **Policy 101: Private members Clubs**

- A.** Proposals for the change of use of 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 (for 12 months) indicates that the use is no longer viable.
- B.** Proposals for new private members' clubs will only be supported where they can show that they will add vitality to Soho and demonstrate that their potential adverse impacts can be adequately mitigated. ~~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~~

### **Reasoned justification**

#### **Links to Neighbourhood Plan Objective 2.**

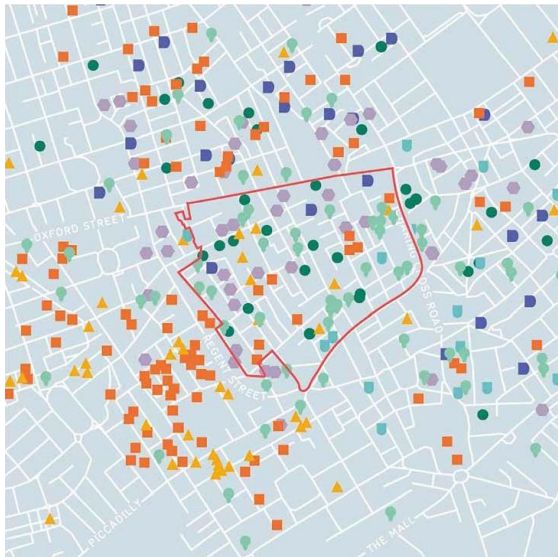
This Policy seeks to support the role that many private members' clubs play as networking venues, for creative industries and business clusters. Networking is an important function and part of Soho's character and culture. "In a rapidly changing city and a developing creative sector, the importance of physical spaces at the heart of the capital is heightened - central meeting places with the most accessibility for all creative hubs and workers, where business can be done, ideas can be born, tested and exchanged" However, whilst the plan seeks to protect ~~these~~ existing clubs ~~which actively provide networking within and across industry sectors~~ it may be that individual clubs become no longer viable. Proposals to change the use of an existing club must be subject to an active marketing test of at least twelve months to establish that there is no continuing demand for that use.

In considering proposals for new clubs it will be necessary to consider whether the purpose and membership criteria does encourage networking and provide real opportunities for local businesses and creative industries to network. This is because a number of small clubs have been established as either ancillary to another commercial activity or with the primary purpose being to provide late night drinking to their members.

As ~~para 17.2 of the draft Local City~~ Plan notes, proposals should be accompanied by an assessment of the development impacts and ~~in para 17.4~~ the benefits that the local community will gain from such uses. 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 ~~M~~management ~~P~~plan to prevent nuisance to neighbouring occupiers.

Networking is a key function in its own right as well as being able to complement and support creative industry and other Soho businesses. However, the provision of overnight accommodation to members, which is a feature of some members' clubs would risk increasing the size and scale of such clubs to provide bedrooms and therefore risk displacing other valuable creative and cultural uses and therefore would not be supported.

### **Figure 4 Map of PUBLICA Creative Industries**



## **SECTION 3 ENTERTAINMENT AND NIGHT-TIME ECONOMY**

### **3.1 Entertainment venues**

#### **Policy 112: Live Music Venues**

- A.** Existing ~~(D2)~~ music venues will be protected **especially if they host live music.**
- B.** ~~New~~The development of live music venues ~~(D2)~~ will be supported **especially if they host live music and** provided they **do not have an unacceptable** ~~are low~~ impact **on residential amenity.** ~~and comply with policy 34C of the draft Local Plan in terms of noise and show how the arrival and dispersal of customers is managed to mitigate any adverse impacts. Links to Plan Objective 4~~

#### **Reasoned justification**

##### **Links to Neighbourhood Plan Objective 4.**

In the 40 years spanning 1950s–1990s, there was hardly a music scene that did not start in Soho, from the 21's on Old Compton Street onwards.<sup>38</sup> Soho is still arguably an entertainment hub although in recent years, grassroots live music has reduced considerably, replaced by restaurants and nightclubs by bars. The number of live music venues has been falling due in part to changed commercial priorities, safety and planning restrictions and increasing rent and rates. However, **the Forum's** public consultation showed within the area “strong cultural associations, particularly for live music venues and entertainment in Soho”.

Although there are a number of locations where music performance can and does take place as Figure 4 of the Publica Creative Industry Study shows, there are currently a very limited number of dedicated music venues such as Ronnie Scott's, Pizza Express Jazz Room and Ain't Nothing but the Blues remaining in Soho. The **pPlan** recognises live music as part of Soho's history and heritage and is closely related to the creative industries.<sup>40</sup> It is a crucial part of London's live music culture long term and this policy wishes to help reverse the decline in the number of venues offering live musical events by these policies, **but** they will only succeed if viable commercial proposals for such use come forward.

Because Soho's streets and pavements are often narrow and intimate the impacts of large numbers of people arriving and leaving such venues could be very disruptive so proposals for such uses will need to be carefully thought through as to how they can be managed. The 2016 Westminster City Plan noted in para 4.39 "Many streets in Soho have night-time pedestrian flows of over 40,000 people, with some streets busier at 3.00 am than 3.00 pm. The concentrations of crime hotspots in Westminster are located in those areas with the highest volume of late-night entertainment uses. As a result, a Stress Area was designated in the West End, where the number of entertainment uses has reached a level of saturation and harm is being caused". The situation has not changed substantially since then.

The **pPlan** supports the protection of existing cultural uses such as cinemas and theatres and **D2** music venues and the **aAgent** of **cChange** principle applies. It is also supportive of carefully considered growth in **D2** entertainment and live music. This use should be promoted as being primarily viable as an evening activity rather than a late-night activity because it is recognized that the late-night economy in general adds a degree of pressure to local services and can have adverse impacts on residential amenity. It is important that adverse residential impacts are considered; **and** that all night-time establishments operate in line with, and are early adopters of, any best practice provided by the Metropolitan Police, Westminster City Council and other relevant stakeholders to ensure venues are well regulated and managed **and** without adverse impacts on residential amenity and the public realm. This should include having **a Management Plan including** management policies to promote the quiet dispersal of customers.

There may be locations on the edge of Soho close to major roads or underground/Crossrail stations where larger units could effectively handle arrival and dispersal and/or later hours and may be acceptable.

While wishing to support the provision of live entertainment as an important part of Soho culture and identity, this **pPlan** wishes to prevent as far as possible the harmful impacts that continue to be identified by neighbours, police and **cCouncil**. 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.

In addition, all planning permissions that include the provision of food and drink should have conditions attached to the planning consent which prevent deliveries and waste collections, particularly those involving uncrushed bottles, during the night, in order to protect residential amenity. Controlling these extremely noisy operations is particularly important in relation to the World Health Organisation's recommendations on the benefit of uninterrupted sleep to human health and well-being.

## **3.2 THE NIGHT-TIME ECONOMY**

### **Policy 123: Food and Drink uses Beverage Developments to Protect Existing Residential Amenity**

~~In order to be supported pProposals for new food uses (Class E), public houses, drinking establishments, take-aways and music venues (Sui Generis) A1 cafes, A3, A4, A5 and D2 uses which require planning permission and are contiguous in direct physical proximity to residential use must fully apply comply with the 'agent of change' principle and demonstrate that they will not have unacceptable amenity adverse impacts (including in relation to noise, vibration and odours), on residential amenity which cannot be mitigated. Links to Plan Objectives 4 and 5~~

#### **Reasoned justification**

### [Links to Neighbourhood Plan Objectives 4 and 5.](#)

Soho's evening economy is well developed and varied. Theatres, cinemas, galleries, pubs, bars, restaurants and clubs all offer an unrivalled mix. The evening economy is hugely popular and valuable to the London and UK economy. Whilst there are a number of well-run late-night entertainment and other venues, an unregulated approach to the late night-economy will further damage residential amenity and may add to increased incidents of anti-social behaviour and crime. While there is no clear cut-off point when the evening economy ceases, the nature of the late-night economy gradually changes the neighbourhood area to one sometimes more based on the consumption of alcohol and illegal drugs and various forms of anti-social behaviour. As a result, it can be more problematic. Problematic for police and other agencies to control and enforce against and problematic for residents and workers because of the noise, littering, street fouling, anti-social behaviour and crime, which can accompany it.

[Factors such as the growth in uses associated with the night-time economy \(for example, food and drink uses\) and the acceptance of longer opening hours typically results in an increase of adverse impacts on those living contiguously to such uses and particularly late at night when other ambient noise levels drop and most residents are expecting to sleep.](#)

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.

Although the ~~draft CityLocal~~ Plan 2019-2040 does not refer to stress areas, it is important to note that the SNA has been part of a defined stress area in terms of premises licensing policy since 1993. It is also in licensing terms a Cumulative Impact Area. The need for policies controlling the growth of alcohol and entertainment activity has increased since 1993 rather than decreased. In addition, in the Council's Tourism, Arts, Culture and Entertainment (TACE) policies agreed in 2004 and set out in the 2007 Unitary Development Plan sought to control the size of new TACE premises it stated "The City Council considers that larger (over 500 sqm) entertainment uses ..... have the greatest potential to generate noise and disturbance in streets nearby...". It went on to note that they have the highest likelihood of, and number of, incidents of crime and anti-social behaviour and that within Soho's narrow street network there are particular problems with arrival and dispersal at large venues. [These conditions have not improved as is shown in the City Council's most recent cumulative impact assessment in March 2020.](#)

The ~~p~~Plan recognises the demand for food and beverage and entertainment uses but proposals which are located above below or immediately adjacent to existing residential space can cause particular and localised problems. Proposals in close proximity to residential will need to take particular account of the potential for adverse impacts and ensure that suitable and effective mitigation is in place if they are to be supported. Some examples of potential adverse impacts are structure borne noise, noise from patrons and staff, collections and deliveries at unsocial hours, ~~smells and~~ odours and obstruction of residential entrances and passageways. In bringing forward their proposals ~~and in their submission and operational plan~~ applicants must show ~~consider~~ how such adverse impacts will be avoided and mitigated.

### **Policy 134: Provision of Public Toilets**

Development proposals which incorporate additional public toilet provision within the ~~Plan~~ neighbourhood area will be supported in order to ensure that adequate facilities are available for users of new developments, particularly those in the food, drink and entertainment sectors. ~~Links to Plan Objectives 4 and 5~~

#### **Reasoned justification**

### [Links to Neighbourhood Plan Objectives 4 and 5.](#)

Street fouling is a continual problem in Soho and appears likely to increase ~~grow~~ as the number of food and drink related establishments rises ~~increases~~. The problem is at its worst late at night when many licensed premises offering such facilities have closed. This ~~p~~Policy strongly supports development proposals, which include all types of public toilet provision such as pissoirs and pay for use toilets.

The London Plan has a specific policy in relation to the provision of public toilets.<sup>1</sup>

Westminster City Council's Licensing Policy Statement indicates the concentration of night-time economy related businesses. These were stated to be 1,304 licensed premises within the West End Cumulative Impact Area in March 2020.

Therefore, pProposals providing hospitality, food and drink should in their planning statement consider the increased need for public toilets which is likely to be a consequence of their proposals and set out the contribution (which may be a financial one) they will make to achieve adequate publicly accessible toilet provision.

## **SECTION 4 HOUSING**

This section addresses matters concerning the location design and development of new housing and space standards within the Neighbourhood Plan Area. It also contains policies to protect and safeguard residential amenity from the potential adverse impacts from major development both during construction and once in use.

### **4.1 THE NEED FOR HOUSING**

#### **Policy 145: Provision of Affordable Housing**

Where to meet Local Plan requirements affordable housing can only be is provided 'in the vicinity' of a host new residential development, the off-site provision will be, vicinity in this Plan is defined as normally being within the Soho Neighbourhood Area wherever possible and subject to Policy 9G of the draft Local Plan. Links to Plan Objective 5

#### **Reasoned justification**

##### **Links to Neighbourhood Plan Objective 5.**

Commercial growth within Soho should not undermine the strength and viability of the residential community, which, although now relatively smaller in size, has played a vital part in Soho's history and success. It is recognised by the Forum that a number of the benefits of growth come at a cost to local residential amenity and that at least some of these benefits should be applied to supporting the residential community to offset, mitigate and reduce adverse impacts. The plan supports the need for more housing and notes the AECOM Housing Needs Assessment objective assessment that 284 dwellings are needed over the period 2018-2037. The new draft City Local Plan 2019-2040 provides good reasons for seeking to increase the local supply of housing particularly for workers able to pay intermediate rents and for seeking growth in all tenures in order to sustain a balanced range of housing tenures and has strong policies to achieve it. Although However, as the SNA sits within the WERLSPA and the West End International Centre, residential uses are not the priority use.

As the WCC draft City Local Plan states, affordable housing (which may include intermediate and/or social housing) should be an integral part of new development where its size and scale requires it to be provided. This policy seeks to ensure that affordable housing, if it cannot be provided on site is provided wherever possible within the Soho Neighbourhood Area.

#### **Policy 156: Car Free Residential Developments**

Proposals for rResidential development should not only be car free except for disabled persons car parking, but by legal agreement ensure that occupants of new housing have no right to apply for a residents parking permit (other than disabled people). Links to Plan Objectives 5 and 6

#### **Reasoned justification**

##### **Links to Neighbourhood Plan Objectives 5 and 6.**

Car use has an adverse impact on health. It is also recognised that Soho has amongst the worst air quality in London and vehicular traffic is a major generator of such pollution. This is of high concern to those consulted in our the Forum's two public consultation surveys. Additional car traffic arriving at or leaving residential parking would add to this. In addition, it would add to further congestion in the

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<sup>1</sup> [https://www.london.gov.uk/sites/default/files/intend\\_to\\_publish\\_-\\_clean.pdf](https://www.london.gov.uk/sites/default/files/intend_to_publish_-_clean.pdf) pages 258-260

narrow thoroughfares in Soho, which detracts from the pedestrian experience. ~~Where new residential accommodation is provided potential occupiers should be made aware that they will not have the right to apply for an on-street residents parking permit.~~

Transport for London's (TfL) PTAL assessment show that Soho has the benefit of ~~one of~~ the widest range of tube, bus, cycle hire and public and private taxi hire options anywhere in Westminster and London to provide alternative methods of transport. WCC's ~~draft Local City~~ Plan in Appendix 2 requires development to be car free within the CAZ.

**The Forum recommends that the City Council goes further and agrees with applicants that in selling, leasing, letting or otherwise disposing of the accommodation provided in the development they undertake by legal agreements with occupiers (other than disabled people) before occupation that they give up the right to apply for a resident's parking permit.**

WCC ~~draft City Local~~ Plan ~~policy 28D~~ states "when considering parking impacts the council will prioritise ~~esse~~ alternative kerbside uses ahead of parking for private vehicles" ~~and that. Policy 28H also states~~ "Proposals for ...motor vehicle public parking... will be assessed against the objective of reducing motorised travel". There is additional supportive wording **in the City Plan's section on parking and in particular it is noted that** ~~in paragraphs 28.1 to 28.4, 28.6, 28.9 and 28.12. In addition, 28.14 states~~ "Issuing permits for developments that have no on-site parking facilities would mean that the number of cars parked on the street is likely to increase." Westminster City Council's Walking Strategy 2017-2027 on Page 63 notes that Westminster planning policies encourage car free development and refers to the city having one of the most extensive public transport systems in the world. As set out in the Walking Strategy's Objective 6, it **states that it** is important to achieve behaviour change over the life of the **Strategy** Plan.

**This plan also recognises t** ~~here is also a recognised~~ problem of congestion and poor air quality as set out in ~~the Environmenta separate~~ section of this ~~p~~Plan. It is ~~therefore~~ important that new housing provision does not add to the pressure in already intensively used residents' street parking. On-street residents parking in Zone G is already heavily used. **These factors underline the importance of the Forum's recommendation to the City Council.** ~~Therefore, all new housing should be car free, except for disabled persons car parking in line with the draft London Plan standards. The policy requires planning consent for new residential development to contain a condition secured by legal agreement that owners and occupants of the housing that is provided in the SNA do not have a right to apply for a residents parking permit.~~

~~Car club membership should be offered as an alternative as they can provide access to a range of vehicle sizes and types for residents required, unavoidable or essential uses.~~

~~The removal of the right to apply for on-street residential parking permits can be legally achieved provided Section 16 of the Greater London Council (General Powers) Act 1974 is used rather than by Section 106 agreements.~~

## **4.2 HOUSING MIX AND USE**

### **Policy 167: Residential Space Standards**

- A.** ~~To be supported d~~Development proposals for new housing should **provide an appropriate mix of units, of which the majority should be** ~~focus on smaller sized, one and two-bedroom, units, to respond to identified local housing need.~~
- B.** All **new** housing units should **conform to the space standards set out in the City Plan. However, development proposals should also have due regard for the level of housing need, to make efficient use of land, and respond to the finer grain character of buildings within Soho.** ~~not exceed 138 sqm which is also the highest minimum standard in the Nationally Described Space Standards. Links to Plan Objective 5~~

#### **Reasoned justification**

##### **Links to Neighbourhood Plan Objective 5.**

~~As stated by the updated Ministry for Housing Communities and Local Government (MHCLG) 'Technical housing standards - nationally described space standards (2016)' 58, the minimum space standard for a new or converted 6 bedroom, 8 person dwelling (including 4sqm built-in storage) home is 138sqm.~~

~~The New London Plan (NLP, assumed to be published this year, and therefore currently in a near-finalised form) mirrors these residential space standards in Policy D4 – Housing Quality and Standards (Table 3.1). The reputable report ‘One Hundred Years of Space Standards’ (2017) forms part of the New London Plan evidence base, within which the same Nationally Described Space Standards are referenced.~~

~~At a local level, the submitted draft Local Plan stipulates a maximum space standard of 200sqm to meet demand from prime market residential sales; however, this standard is somewhat unfounded, with no reference to it within the evidence base for the Plan. The Westminster Housing Needs Analysis (2019) which forms part of the draft Local Plan evidence base, expresses a clear need for affordable family-sized homes across the City, however there is no local area differentiation to reflect location, urban fabric or character. The Analysis also does not stipulate space standards to support a maximum size of 200sqm.~~

**The City Plan 2019-2040 expresses a clear need for affordable family sized homes across the city. However, there is no local area differentiation to reflect location, urban fabric or character. Within the neighbourhood area, space is at a premium and should wherever possible be used effectively to provide housing.**

**In support of this, the Publication London Plan states that “Boroughs are ... encouraged to resist dwellings with floor areas significantly above those set out in Table 3.1 for the number of bedspaces they contain due to the level of housing need and the need to make efficient use of land.” The Forum supports this approach and notes that Table 3.1 states that the minimum gross internal floor areas for all types of 1 and 2 bed dwellings are significantly below the City Council’s limit of 200sqm which applies to all homes and is substantially in excess of the National Space Standards for even the largest homes.**

An independent Housing Needs Assessment was carried out for the Soho Neighbourhood Forum area in 2018 by AECOM; it forms part of this ~~p~~Plan’s evidence base. This study is specifically tailored to examine Soho’s household composition, trends and forecasts, thus is a ~~more~~ targeted evidence source. Therefore, if recent trends of one person households and couples with no children living in Soho ~~is~~are to continue, there will be a much greater need for smaller 1 and 2 bedrooms homes in particular, ~~meaning the maximum size of 138sqm dwellings will be more than sufficient.~~

Large housing units do not make the best use of the limited available housing **floor** space in Soho and should not **normally** be permitted.

The only exception to this policy will be where a larger unit is needed to ensure the protection of a heritage asset.

Overly large units have been called ‘trophy’ units and can be ones owned and only occupied for brief periods of the year. This is an inefficient use of precious and limited housing space within Soho and should be avoided. Where larger units are proposed for conversion to smaller units these will normally be supported.

### **4.3 RESIDENTIAL AMENITY**

#### **Policy 178: Maintaining Residential Amenity During Construction Works**

- A. To be supported, any new Major development proposals in Soho of a scale and type that will be likely to generate significant will protect, and where possible enhance, residential amenity during the construction traffic and other impacts should demonstrate (through a and fitting out phase. A Cconstruction mManagement pPlan or otherwise(CMP) will be required to demonstrate that adverse how the impacts on traffic and residential amenity have been considered, avoided, and/or will be mitigated.**
- B. The assessment must comply with the Council’s Code of Construction Practice, consider cumulative impacts with other developments in the vicinity, and be undertaken in consultation with residents and workers in the vicinity of the development. Links to Plan Objective 5**

***Reasoned justification***

**Links to Neighbourhood Plan Objective 5.**



This ~~p~~Plan notes and welcomes section 7 of the ~~draft~~ City Plan 2019-2040. In the Soho Neighbourhood Area, these 'neighbourly' policies can be enhanced by really thorough **prior consideration of, and consultation on, the demolition and construction impacts of major development and set out in clear documents such as Construction Management Plans and Delivery and Servicing Plans for all major development** in accordance with Westminster's Code of Construction Practice.

Westminster City Council first declared Soho a 'stress area' in terms of the cumulative impact of café, restaurant, bar and club entertainment uses in 1993 and these policies have been updated a number of times. The concentration of such uses has continued to increase. Demand to increase provision of other commercial uses has been almost equally strong. As a result, some areas of Soho have experienced a high-level of disruption through continual works and development leading to a sense of over-development in recent years, with negative impacts from noise, dirt, air pollution and traffic disruption, along with increased antisocial behaviour in locations where the quality of the general environment has declined. At one point during summer 2017 there were believed to be more than 50 sites within Soho's quarter of a square mile where some form of development activity was taking place.

Development has an important part to play in Soho's future to allow it to evolve, but multiple developments taking place simultaneously in such a small area are likely to have cumulative impacts on amenity and the desirability of Soho as a destination. **Prior consideration of the impacts involved and local consultation to minimise adverse impacts on-site will help local businesses and residents prepare for and minimise disruption. Local consultation can also help more widely in discussing things like diversion signage, phasing of construction and highway utility works to reduce this disruption-is helpful. Reducing adverse impacts and improvements to residential amenity will also be likely to improve amenity for businesses, their employees and visitors.**

**The issues which applicants should consider in compiling their proposals should include, but are not limited to ways to minimise or avoid noise, dust, odour, traffic disruption and diversion and working out of normal hours. Westminster City Council's Code of Construction Practice has a helpful template in Appendix H in relation to considering cumulative impacts.64 Positive opportunities as a result of development proposals might include measures to address deficits in biodiversity, greening, play space, open space, improvements to nearby public realm, designing out crime, contributions to support community social cohesion and infrastructure such as support for facilities for vulnerable people.**

### **Policy 189: Delivery and Servicing Plans for New Development**

- A.** Major ~~D~~development ~~will protect amenity through reducing and minimising deliveries and servicing by vehicles using fossil fuels~~**should be designed to minimise deliveries and servicing.**
- B.** It must show in a ~~Where appropriate,~~ **Delivery and Servicing Plans (DSP) are encouraged and must address adverse impacts** that on completion and once in use the adverse effects from deliveries on the immediate local environment and public realm in terms of noise, carbon emissions and pollutants, ~~have been mitigated or avoided. Links to Plan Objectives 5 and 6~~

#### **Reasoned justification**

##### **Links to Neighbourhood Plan Objectives 5 and 6.**

~~The issues which applicants should consider in compiling a Construction Management Plan (CMP) include, but are not limited to, ways to minimise or avoid noise, dust, odour, traffic disruption and diversion and working out of normal hours. Westminster City Council's Code of Construction Practice has a helpful template in Appendix H in relation to considering cumulative impacts.64 Positive opportunities as a result of development proposals might include measures to address deficits in nature, play space and open space, improvements to nearby public realm, designing out crime and contributions to support community social cohesion and infrastructure such as support for facilities for vulnerable people.~~

As ~~is~~has been referred to **earlier and in the Environment section of elsewhere** in this ~~p~~Plan, Soho has some of the worst air quality in London and it also experiences high levels of vehicular congestion. **This policy requires development proposals to consider how best to minimise**

deliveries and servicing to address these problems. The West End Partnership has produced a Freight and Servicing Strategy which sets out a series of steps and targets to reduce delivery and servicing by vehicles as a way to start to reduce congestion and ~~also~~ help to improve air quality. Major development proposals should be accompanied by a clear Delivery Service Plan (DSP) which can demonstrate that once in use, occupiers of the completed development are enabled to minimise their deliveries and collections and to do so in ways which reduce or eliminate their reliance on fossil fuels. For example, the DSP could ~~must~~ show how the servicing of the premises once in occupation will contribute to improving air quality by incorporating measures which reduce ~~and/or to reducing~~ vehicle movements. This might ~~and be~~ focused on enabling ~~prioritising~~ last mile deliveries to be made on foot and by cycle instead of ~~before~~ the use of zero or low pollution vehicles, the use of freight consolidation, shared delivery arrangements and the timing of deliveries to reduce additional congestion.

~~The preparation of an operational Deliveries and Servicing Plan (DSP) for completed major development should show that the effects on the public realm in the immediate vicinity of the proposed development have been avoided or minimised. These should include the methods of travel of employees, visitors and customers, the delivery, maintenance and servicing requirements.~~ Also, the Forum recommends that ~~but only if required by Westminster City Council,~~ the developer is encouraged to provide a sum to Westminster City Council allocated to cover the cost of the Council monitoring the DSP which is important to ensure it is being complied with.

As a method ~~In order~~ to reduce congestion, deliveries and collections in the evenings may be considered as an option ~~become necessary~~. But night-time noise is a significant problem for many Soho residents. Clearly, living in a city centre means experiencing higher levels of noise than most other places. However, disturbed sleep can have significant health impacts and where possible this should be mitigated, in particular between the hours of 11pm and 7am. As an informative, residents cite customers leaving premises (especially from venues with alcohol/loud music), pedicabs, waste collection (especially bottle collections) and car horns (often from PHVs and/or as a result of traffic held up by waste collection vehicles/PHVs) as reduceable sources of avoidable night-time noise.

~~CMPs and DSPs that address and reduce these issues as part of drawing up proposals will support the sustainability of Soho's mixed and residential community.~~

~~Both CMPs and DSPs should be secured through appropriate planning conditions.~~

## **SECTION 5 SUSTAINABLE DEVELOPMENT AND THE ENVIRONMENT**

This plan recognises that as a historic neighbourhood area opportunities to remodel the neighbourhood area in the face of the challenges that climate change represents are likely to be difficult to achieve but it is expected that all development proposals will be aware of and take account of the need to ensure that what is proposed contributes to the principal of sustainable development and the need for progress towards a net zero carbon ~~free~~ economy over the pPlan period.

In this section there are policies to help improve air quality, reduce the waste of energy, to encourage retrofitting where it is practical and the best environmental solution. There are also policies to encourage freight consolidation, provide green infrastructure and improve local facilities for pedestrians and cyclists. Finally, there are policies to help tackle one of Soho' most enduring problems the amount of waste and recyclables and the way it is collected and disposed of.

### **5.1 AIR QUALITY AND CLIMATE CHANGE**

#### **Policy 1920: Improving Air Quality**

Design ~~development~~ proposals must maximise measures which contribute to improving ambient and indoor air quality by measures such as construction and deconstruction ~~green infrastructure~~, delivery and servicing plans, green infrastructure and methods of on-site renewable energy

generation which ~~seek to achieve zero air emissions, emit less pollutants and reduce reliance on the use of fossil fuels.~~ Links to Plan Objective 6

### **Reasoned justification**

#### **Links to Neighbourhood Plan Objective 6.**

Soho and central London generally are particularly vulnerable to the 'heat island' effect and also experience some of the worst levels of air pollution in the City of Westminster. **It is therefore important to seek to protect the health of those living, working and visiting Soho by measures focused on improving air quality both during construction and in use.**

While pollution is in the atmosphere and wind born, the ~~Pp~~plan supports the ~~City~~Local Plan 2019-2040, which seeks to prevent as far as possible more pollutants being ~~added~~**released in** into the atmosphere from buildings and activities within Soho.

The need to control particulate dust as set out in the GLA good practice note speaks for itself and the plan supports an air quality positive approach and local zero emissions zone wherever these are practically possible. All development proposals during the construction phase must demonstrate how they will comply with the best practice guidance **set out** in ~~that~~ GLA and London Councils guidance note "The control of dust and emissions from construction and demolition".

Machinery used during demolition and development at present is very diesel dependent and policies to require lower emissions from demolition and construction plant encourages the industry to invest in less polluting and more energy efficient machinery.

All power generation sources that are used to demolish, construct and provide continuity of supply to developments such as construction plant, stand by generators, decentralised energy plant including CCHP (Combined Cooling Heat and Power) must be those designed to emit the lowest practically possible level of pollutants when in use.

While much pollution is caused by vehicles through their emissions and tyre and brake wear controlling these pollutants is largely outside the scope of a land use plan, ~~but some measures are possible as the policy sets out.~~ **but improvements to public health can also be achieved by development aiming to be air quality neutral and to not cause or contribute to worsening air quality.**

### **Policy 204: Reducing Energy**

All development proposals should incorporate measures designed to **minimize and** conserve heat and energy **use**, reduce **urban heat island effects, and** carbon emissions ~~and avoid features such as doorless entrances and external heating which lead to energy waste.~~ Links to Plan Objective 6

### **Reasoned justification**

#### **Links to Neighbourhood Plan Objective 6.**

As ~~the~~ **Westminster's** 2016 ~~Local~~**City** Plan stated, "Westminster's Core CAZ is particularly vulnerable to the urban heat island effect. Because of its concentration of commercial buildings, this area has a higher cooling load than surrounding areas. Within Westminster, this is compounded by the concentration of evening and late night-time activities that use energy and have heating and cooling loads and emissions over a much longer period than normal commercial hours. The area is effectively a 'heat island' on top of a 'heat island'". The GLA Sustainable Design and Construction SPG on page 15 encourages developers to use less energy.

Solving these carbon emissions problems is outside the scope of a neighbourhood plan but **the solutions do include behavioural changes by everyone.** ~~its policies can make a contribution as required in this policy.~~ In Soho, heat is currently wasted **in a number of ways,** through such ~~things as doorless open-~~**Important examples are** shop entrances **where closable doors are not**

provided and the entrance to the unit is heated by an air curtains and only secured when the unit is closed by roller shutters; Each application will need to be judged on its own merits and in appropriate cases set back entrances may be the right solution and it is also important that a free flow of air is provided to prevent the need for energy intensive air conditioning. Another wasteful example is external space being heated ~~also~~ by external gas or electric heating to outside seating and/or smoking areas. Avoiding such activities and designs offers useful local ways to reduce the wasteful use of energy and the resulting emissions. Retail proposals which include self-closing doors or other measures to reduce waste of heat and emissions to air will be supported.

## **Policy 212: Refurbishment and Retrofitting of Existing Buildings**

- A. In recognition of Westminster City Council's climate emergency declaration and their commitment to the city becoming carbon neutral by 2040, all m**Major development **should** ~~must~~ **take every opportunity to demonstrate that it has** evaluated the potential of options to **sensitively** retrofit and improve the sustainability of existing buildings ~~before considering redevelopment.~~
- B.** Retrofitting measures to **any** existing buildings which require planning permissions will ~~normally~~ be strongly supported.
- C.** Where retrofitting involves adaptations to heritage assets, these **will** ~~may~~ be supported **provided adaptations safeguard the historic characteristics of these heritage assets** ~~where the impacts have been carefully considered and justified and adverse impacts minimised and which do not cause significant harm. Links to Plan Objective 6~~

### **Reasoned justification**

#### **Links to Neighbourhood Plan Objective 6.**

Retrofitting and refurbishment rather than comprehensive redevelopment of non-heritage assets **is an important approach to helping the City of Westminster move to a net zero carbon economy and** can be a practical and cost-effective way to ~~reduces~~ the local environmental impacts of development as well as avoiding the unnecessary use of resources to demolish and construct which add to climate change pressures.

Proposals to retrofit heritage assets to help improve their sustainability will also be supported where they can show they have been carefully considered and are supported by conservation officers and Historic England as appropriate. **Indeed, Soho was the area chosen for research supported by WCC and Historic England to examine ways to improve the environmental performance of historic buildings.**

For major development retrofitting should be considered right from the inception of a scheme. This allows development to focus only on the parts of a building that need replacing or renovating and upgrading to create a sustainable new building. It can avoid the disturbance and waste of embodied energy caused by full demolition and reduce the new resources required by total redevelopment. It will not always be the right solution and a wholesale redevelopment scheme can sometimes offer wider benefits. However, in moving to a net zero carbon economy total redevelopment is increasingly **recognized as** a less sustainable option.

~~At the point this Plan has been drafted industry has been reluctant to embrace retrofitting but for the reasons set out it is likely to be a much more sustainable way forward so this policy will strongly support such proposals.~~

Measures to support retrofitting in all development proposals regardless of size could include but are not limited to:

- Measures to improve sound insulation and prevent heat loss;

- Measures to harvest rainwater for use within the development;
- Sustainable urban drainage systems;
- Micro generation and minimising fossil fuel use; **and**
- Maximising electrical infrastructure so that as it becomes more available renewable energy can be increasingly used.

In major development all Planning Statements should assess and show that retrofitting options have been considered and adopted as far as possible. If such measures are not adopted in whole or in part the Planning Statement should indicate the reasons why this is so.

## **5.2 TRAFFIC CONGESTION AND FREIGHT CONSOLIDATION**

### **Policy 223: Delivery Consolidation Points**

- A. Proposals for freight micro-consolidation and last mile delivery centres will be supported within the Soho Neighbourhood Area.**
- B. Redevelopment proposals for use of all or part of the Any development proposals for the public car parks at Brewer Street and Poland Street for freight micro-consolidation and/or last mile delivery centres will be strongly supported. must demonstrate consideration and evaluation of the potential for adaptation and reuse for all or part of the buildings as micro-consolidation centres. Links to Plan Objective 7**

#### **Reasoned justification**

##### **Links to Neighbourhood Plan Objective 7.**

Traffic congestion is a significant cause of additional carbon and pollutant emissions, delay to business, risk to health and delay to pedestrians. The pressure of traffic constantly struggling to pass parked vehicles in Soho's many narrow streets also erodes and degrades the physical environment within Soho. It was a repeated public concern expressed in the two major consultation exercises in the early stages of establishing **the** aspirations for the plan. Delivery and servicing **are** a cause of congestion within Soho and contribute **s** to pollution. In order to enable **reduction** measures to be introduced over the life of the plan to address these issues there is an increasing need for **measures** **schemes** such as freight consolidation and micro last mile delivery **schemes**. Improving air quality is also high on the Mayor's agenda and is one way in which London will become 'zero carbon by 2050'.

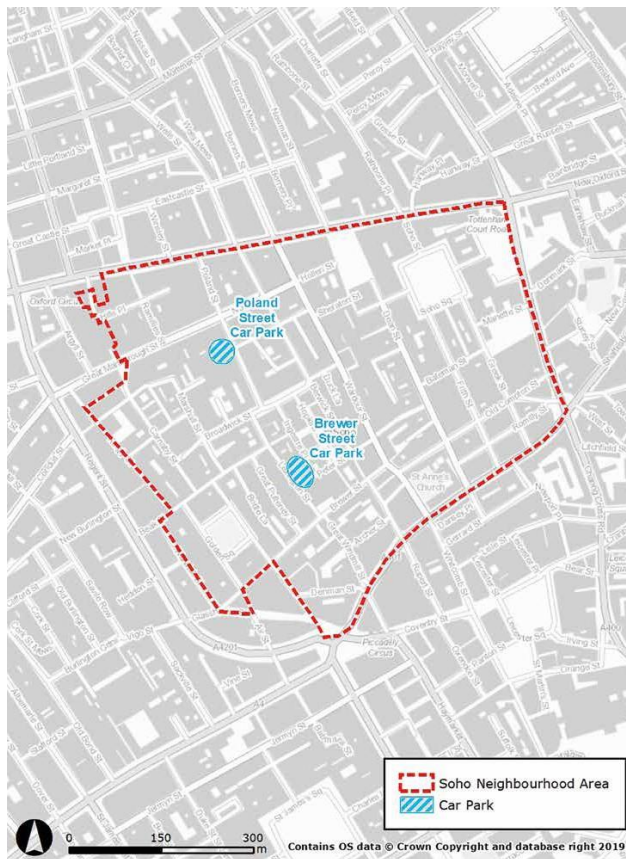
The Mayor of London's Transport Strategy 2018 seeks to make 80% of all trips in London to be made on foot, by cycle or using public transport by 2041. Westminster City Council also seeks to reduce traffic congestion through its Greener City Action Plan.

Light Van and HGV's make up 17% of London's traffic second only to private cars. The Mayor's Freight and Servicing Action Plan seeks in Proposal 17 to support last mile and micro consolidation centres to reduce the intensity of light van use. The **Publication new draft** London Plan supports **freight** consolidation. **Draft p**Policy SD4 provides, in part M, that within the CAZ sufficient capacity for industry and logistics should be identified and protected, including last mile distribution, freight consolidation and other related service functions. **Draft p**Policy T7 provides, at part E, that development proposals for new consolidation and distribution facilities should be supported provided that they enable sustainable last mile movements, including cycle and electric vehicles. The SNA is already heavily developed and intensively used and there is no vacant land capable of making such provision. The Soho Neighbourhood Forum has identified that the two existing garages at Brewer Street and Poland Street (see Figure 5) are **the only** structures in the **neighbourhood** area with road access in which such schemes could potentially be viably adapted and therefore are preferred sites for this use.

It is likely that these two car parks will continue to become more and more under used for their original primary purpose, as drivers continue to respond to the Ultra-Low Emission Zone (ULEZ) and Congestion Charge. **Therefore, development proposals may come forward to redevelop them or change their use. Without consideration of the need for better freight logistics in Soho this** which would eliminate **the two most potentially viable opportunities the last viable sites** for micro-consolidation to be achieved within Soho. The **Forum neighbourhood plan** in seeking to encourage freight consolidation **recommends** requires that any development proposals for these two garages should consider and actively evaluate the potential for micro-consolidation use to form all or part of the future use of the premises. Proposals which include a use of this type will be strongly supported. Proposals which are unable to demonstrate clearly why such uses cannot be incorporated into the proposal will not be supported.

It should be noted that logistics firm DHL when consulted stated to the **F**orum that these sites “can work for micro-consolidation for parcels for local deliveries, it is something we would really welcome. The locations look good.” It should also be noted that parcel carrier DPD received planning consent on 31st July 2019 for such a distribution centre at the Hyde Park garage on the edge of Mayfair.

**Figure 5 Map of car parks in the Soho Neighbourhood Area**



## **5.3 GREEN INFRASTRUCTURE**

### **Policy 234: New Pocket Parks**

- A.** The creation of new green ‘pocket parks’ **will be strongly supported in those parts of Soho with an open space and/or play space deficiency.**
- B.** **Pocket parks and/or rooftop gardens designed for employees, residents and visitors on roofs for employees and others** to use will normally be supported provided **suitable measures and** a robust management plan is in place to mitigate any potential adverse

impacts, particularly for factors which affect residential amenity such as noise nuisance or overlooking. ~~Links to Plan Objective 6~~

## Reasoned justification

### Links to Neighbourhood Plan Objective 6.

Soho is an area of deficiency in terms of nature, open space and play space so improvements to green infrastructure have a particular priority. Providing green infrastructure increases the overall sustainability of new development, helps provide habitats also and connecting routes for wildlife between the major parks. When such infrastructure is also wholly or partially visible from the public realm it also adds to the sense of health and well-being and makes the neighbourhood area appear more attractive.

This ~~p~~Plan and the Soho Green Infrastructure Audit which preceded it recognises that while there may be some possibilities, the intense 24/7 nature of the area limits the opportunities for sustainable and maintainable improvements to greening at street level across Soho. Utility cables, drains and other services run in complex networks under most pavements so there are only limited opportunities to plant additional trees.

Because the neighbourhood area is already so intensively developed a principal opportunity is therefore above ground, usually at roof level as recognised by this policy. Street level open space within Soho is heavily used and sometimes overused particularly in the summer months. To reduce pressure on these spaces/areas the provision of roof top spaces greened and providing outside seating can be a positive way for development to enhance the working environment of those working within the premises as well as making a contribution to improving air quality and ecology. The potential issues of noise nuisance, overlooking and any other adverse impacts will need to be considered in designing and considering the future management the use of such spaces.

In designing machinery and plant associated with development such plant should wherever possible be incorporated in the roof space below the roof itself or in the basement to allow the roof surfaces to be used for green infrastructure and/or micro generation. Where works including mechanical plant such as lift over runs and air handling can only be practically installed on the roof to meet new requirements or as replacements, greening measures must be built into the solutions, including any screening or housing.

## Policy 245: Sustainable Green Infrastructure on Buildings

- A. Where feasible, dDevelopment proposals should provide the highest feasible level of greening to the building and its curtilage including green walls and roofs to help address poor air quality and improve well-being. ~~Links to Plan Objective 6~~
- B. The implementation of urban greening measures should conform with the Mayor of London's Urban Greening Advice and Best Practice guidance.

## Reasoned justification

Links to Neighbourhood Plan Objective 6. The greening measures required by this policy will contribute to improving air quality, reducing rainfall run off, and increase biodiversity and improving well-being. Proposals should incorporate greening elements (such as more trees, green roofs and/or walls) where practically possible. Factors to be taken into account in deciding where to locate such these measures will include such things as whether or not the building is listed, load bearing issues, and safe access for installation and maintenance. In relation to walls, in suitable locations, plants which grow from the ground and climb up walls will normally be easier to maintain and are less costly than installing high maintenance living walls<sup>81</sup>.

## Policy 256: Improving Public Open Space

The plan indicates in Figure 6 two areas at Ramillies Street/ Place and Dufour's Place which could be are suitable for enhancement in terms of the provision of urban greening measures, and additional

public seating, public art and cultural elements. ~~Proposals to achieve this either through the Community Infrastructure Levy (CIL) Or through voluntary provision by developers will be supported. Links to Plan Objective 6~~

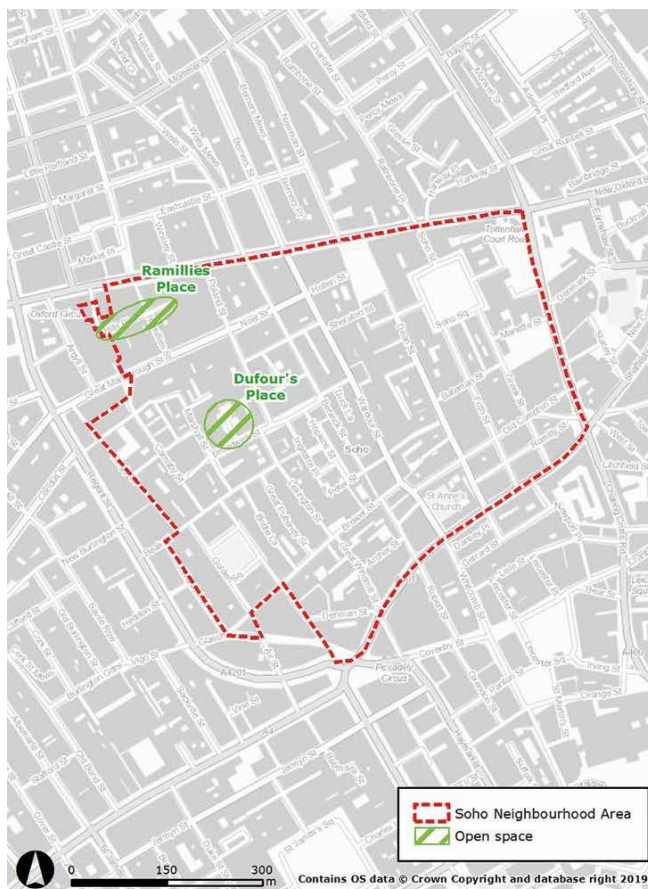
### Reasoned justification

Links to Neighbourhood Plan Objective 6. Soho has three existing public open spaces, Soho Square, Golden Square and St Anne's Gardens. All are intensively used and in periods of fine weather are often heavily overcrowded. They could be further improved. Use of Soho and the Oxford Street District is likely to increase as a result of ~~further~~ business growth and the opening of the Elizabeth Line and potentially Crossrail 2 during the life of the plan. The plan seeks to provide additional spaces where there are opportunities to sit and relax in relatively peaceful and environmentally improved areas. This may be by encouraging applicants ~~as part of development~~ to provide small areas of seating as part of the development or to improve larger designated spaces.

Ramillies Place/Street are defined in the ORB (Oxford Street, Regent Street and Bond Street) Action Plan produced by TfL, Westminster and the NWECA business improvement district (BID) as being a suitable location for a quiet oasis for visitors to be able to rest and relax away from the major shopping streets. This has been worked up by those parties and the Photographers Gallery who are located at the intersection of these streets and the proposals should be implemented. The Forum suggests the proposals would be further ~~and~~ enhanced with greening and seating provision.

Dufour's Place is a 'cul-de-sac' surrounded by residential uses which may have areas capable of public realm improvements to increase local space for greening as well as seating/rest and relaxation providing they are carefully designed to ensure that residential amenity is not harmed.

**Figure 6 Map showing Ramillies Place and Dufour's Place**



## 5.4 PEDESTRIANS AND CYCLISTS



## **Policy 267: Pedestrian Movement in the Public Realm**~~Development Proposals~~

All development proposals should be designed in such a way as to facilitate pedestrian movement and prevent it being impeded by other uses ~~such as the provision of tables and chairs.~~

### **Proposals should:**

- A.** ~~Proposals should s~~Seek to deliver safe, efficient and inclusive design in line with the Healthy Streets Approach and Vision Zero Strategy
- B.** Create clear well lit and well signed pedestrian routes
- C.** Provide even surfaces and minimise steps and level changes wherever possible
- D.** Design out blind spots and recessed doorways
- E.** Provide well-lit and clean temporary passageways during construction and fitting out works
- F.** Reduce vulnerability to flash flooding and ensure that the neighbouring public realm is well drained using sustainable urban drainage systems (SuDS) wherever possible. ~~Links to Plan Objective 7~~
- G.** **Prevent tables and chairs on the pavement or highway impeding pedestrian movement**
- H.** **Ensure new facades and entrances to premises clearly display the street number for each premises to facilitate better way finding.**

### **Reasoned justification**

**Links to Neighbourhood Plan Objective 7.** The plan welcomes and support the Mayor's Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car which is particularly appropriate in a highly developed and complex area like Soho. This policy aims to facilitate ease of movement and compatibility between pedestrians, cyclists and vehicles. The Plan expects that pedestrian use of the **neighbourhood** area will be the priority in line with London Plan and City of Westminster policies while not unduly impeding effective deliveries and collection for businesses. The objective is to see Soho become recognised by vehicle users and cyclists as a 'pedestrian priority area' particularly in the light of the intensification of pedestrian numbers posed by the opening of the Elizabeth line and potentially Crossrail 2. Some of Soho's carriageways and footways are poor and need improvement.

~~There has been a substantial increase in the numbers of tables and chairs placed on the highway by hospitality businesses.~~

~~In the light of the modal shift towards more trips on foot and the opening of the new lines referred to it is important that the use of pavements is reinforced for pedestrian priority.~~

Street lighting in some areas ~~sh~~ould be improved to improve visitor perceptions of safety and enhance the **C**onservation **A**rea. Many pavements are sub-standard in terms of the number of cracked paving and/or rocking paving slabs.

As an area identified in part by the draft **C**ity **L**ocal Plan as a risk of flash flooding, blocked gullies and areas where rainwater lies trapped in 'ponds' makes the area unpleasant for pedestrians to navigate in wet weather and needs to be addressed.

**There has been a substantial increase in the numbers of tables and chairs placed on the highway by hospitality businesses. In light of the modal shift towards more trips on foot and the opening of the new lines referred to, it is important that the use of pavements is reinforced for pedestrian priority.**

**Tourists and visitors indicate that the neighbourhood area's complex maze of streets can be difficult to navigate so the plan urges better signage and digital solutions to improve this aspect.**

**There has been a trend in recent years to omit individual street numbers but this makes it difficult for visitors and customers to find the premises they are seeking and ensuring through**

~~this policy that such numbers are clearly visible in new developments will help to overcome this.~~

The 2014 Soho Public Realm Study by Publica and the proposals by AECOM in Section 6 of its Soho Heritage and Character Assessment provide well-reasoned exemplars of how the neighbourhood area's public realm should be improved.

### **Policy 278: Securing New Pedestrian Routes**

Development that provides carefully considered public access through developments over previously private and inaccessible land to improve pedestrian connectivity and convenience will normally be supported unless there are adverse impacts which cannot be mitigated. ~~Links to Plan Objective 7~~

#### **Reasoned justification**

~~Links to Neighbourhood Plan Objective 7.~~ This policy supports measures to increase capacity, ease congestion and provide safe walking space. The creation of new pedestrian routes in appropriate locations to increase capacity and improve connections on foot can be a welcome benefit as a result of development. Any such proposals will need to consider the potential for adverse impacts such as loss of privacy, noise nuisance and anti-social behaviour.

### ~~**Policy 29: Property Numbering and Wayfinding Signage**~~

~~Facades and entrances to premises must display clearly a street number for each premises to facilitate better way finding. Links to Plan Objective 7~~

#### ~~**Reasoned justification**~~

~~Tourists and visitors indicate that the area's complex maze of streets can be difficult to navigate so the plan urges better signage and digital solutions to improve this aspect.~~

~~There has been a trend in recent years to omit individual street numbers but this makes it difficult for visitors and customers to find the premises they are seeking and ensuring through this policy that such numbers are clearly visible in new developments will help to overcome this.~~

### **Policy 2830: Cycle parking**

Proposals to provide additional suitable on street cycle stands for cyclists visiting the Soho Neighbourhood Area ~~via the Community Infrastructure Levy (CIL) or through voluntary provision by developers~~ will be supported provided they do not impede pedestrian movement. ~~Links to Plan Objective 7~~

#### **Reasoned justification**

~~Links to Neighbourhood Plan Objective 7.~~ In addition to improving accessibility for pedestrians cycling is a sustainable and healthy means of transport to and within Soho and provides an important alternative to the use of vehicles with carbon and pollutant emissions. There are also significant reductions in the carriageway space required for cycles as opposed to other vehicles so increasing space for pedestrians and reducing congestion. Central London is still very dependent on the car and has real scope to increase cycling as ~~this link a report~~ comparing use and safety in major cities shows.

Cycling is largely used by employees as a healthy, quick and environmentally friendly way to commute and the ~~Publication~~ ~~Intend to Publish~~ London Plan and draft ~~Local City~~ Plan have planning requirements to provide cycle parking space with in developments to respond to these needs. However, increasingly those visiting the Soho Neighbourhood Area arrive by bicycle including using new individual cycle hire bikes and seek to leave bicycles in the immediate vicinity of their destination. This can cause obstructions and nuisance. Where possible more on street safe visitor cycle stands

and other methods to safely park and secure cycles should be provided as is consistent with ~~new~~ **Publication Intend to Publish** London Plan policy T5.B

## **5.5 WASTE AND RECYCLING**

### **Policy 2934: Waste and Recycling Facilities in New Developments**

A. Development must provide separate waste and **segregated** recycling facilities within the boundary of the development which has easy access ~~for contractors~~ to collect the materials.

**B. Major commercial development** that is designed ~~for letting~~ to **be shared by** a number of ~~commercial~~ occupiers should provide a single facility for waste **storage** and **also segregated recycling facilities storage** for use by all occupiers of the development.

**BC. Major commercial development**, in addition to providing adequate waste and recycling **facilities should also consider the provision of** ~~as required by policy 38 of the draft Local Plan should provide~~ extra waste and recycling storage capacity **in suitable locations for use by** ~~(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).

**CD. Development** which includes the provision or retailing of food and drink must provide sufficient space in which to store food waste ~~as a separate recycling category from other waste and recyclables~~ and should encourage occupiers to use a food waste recycling service. ~~Links to Plan Objective 8~~

#### **Reasoned justification**

**Links to Neighbourhood Plan Objective 8.** Although there is a City of Westminster Municipal Waste Management Strategy 2016 – 2031 its objectives are difficult to achieve in Soho because of congestion and its complex 24/7 activity. Because of the age and character of buildings within Soho, many do not readily provide sufficient space for on-site storage of waste and recycling materials. A negative aspect of Soho's intimate street pattern and narrow pavements is that rubbish and dumping ~~can tend to~~ disfigure the **neighbourhood** area. ~~Soho has a well-recognised problem of rubbish being left on pavements and it~~ is important that development does not add to ~~this problem that~~. A range of private contractors provide commercial waste and recycling collection services competing on price and levels of service.

In addition, one company Veolia currently has the municipal waste collection contract for WCC. Because land and rental prices are high occupiers can be reluctant to make adequate provision within a building and so the problem is simply ~~be~~ transferred to the public realm. Heavy pedestrian use of the **neighbourhood** area 24/7 means that these rubbish bags impede pedestrians, cause obstruction, are a source of additional litter and dumping and are sometimes damaged by dogs, birds and by people scavenging.

A key aim over the life of the **pPlan** is to reduce significantly the need to place rubbish bags on the street for collection by improving off street facilities. Such provision should be considered as a planning benefit from growth which contributes to improving the **neighbourhood** area's on-street environment. For the **Fforum** it is a higher priority than such things as cosmetic improvements to the public realm and/or public art.

The **pPlan** aims to achieve improvement in a number of ways. Both by requiring as part of development the provision of adequate space to store waste and recyclables and in a **locations** which facilitates easy collection from the building. This applies to commercial and residential development. Also, providing a single **facility point** for waste and recycling within a multi-occupied building will help **to encourage occupiers to act together in relation to waste and recycling. This will help** to minimise vehicle movements related to waste and recycling collections from the building and contribute to reduced congestion and improved air quality.

Major development proposals can and should play an increased part in reducing the need to place rubbish bags on the street. The Crown Estate has led the way with a range of innovative delivery and

waste collection facilities across its West End estate. As the draft City Plan 2019-2040 notes “The amalgamation of facilities in an area may be required in locations that demand an area specific approach to waste management”.

Solutions for major development ~~of a~~ varying scales can be achieved by not only providing the correct space and facilities for the waste and recyclables produced by the occupiers of a major development ~~itself~~, but also by providing additional waste storage space which can be accessed ~~(and paid for)~~ by designated occupiers of neighbouring properties which are without internal storage facilities. The size and layout of such additional space should be discussed with officers as part of pre-planning application advice.

The opportunity to use this additional space should be offered to local occupiers on terms to be agreed between the parties ~~with the~~. ~~The beneficiaries of this provision to deposit their own waste and recyclables for collection should, on the advice of Westminster City Highways officers, be within an indicative radius of 100 metres. Such a waste and recycling storage facility should be well equipped and strictly controlled by suitable technology to weigh and record waste materials, levy appropriate fees and prevent unauthorised access. Suitable s.106 agreements will be required to implement this as part of any planning consent. The~~ proviso that the space so provided should be within the City of Westminster ~~is~~ because the eastern boundary of the SNA immediately abuts the LB Camden.

Additional on street and below ground facilities are also likely to be required where developments are very large.

In relation to food waste Soho has a long and established role as a centre for catering and hospitality. There is a huge concentration of restaurants, pubs, bars, clubs, nightclubs, theatres and other entertainment venues in the neighbourhood area all to a greater or lesser extent providing food. Given this concentration of uses particularly high levels of food waste occur. Businesses in this sector should be encouraged to work collaboratively to ensure that food waste is minimised and dealt with in ways that reduce its adverse impact on the neighbourhood area. Examples are, reducing ~~This is in terms of~~ smells and vermin, ~~as well as~~ food waste and oils, which when mixed in with other waste left on the street awaiting collection mark and stain pavements. ~~In addition~~ However, food waste can be a valuable resource in terms of anaerobic digestion and creating compost. The ~~Forum plan~~ wishes to see all food and hospitality businesses required to provide facilities for food waste recycling and to use a food waste recycling service such as that provided by Veolia the current holder of Westminster’s municipal waste contract.

Requiring individuals and businesses to take more responsibility for the waste they produce requires behaviour change and can be contentious. However, the aspirations and policies for waste and recycling in Soho have been developed following two consultations with Soho residents, visitors and workers as described in the Consultation Statement which showed that there is concern about the issue of rubbish bags left on the street and public willingness to embark on this change.

## 8. GLOSSARY

TERM	DESCRIPTION
Affordable Housing	Housing for sale or rent for those whose needs are not met by the market. In Westminster this is split into ‘social’ and ‘intermediate’ types.
Agent of change	The <u>a</u> Agent of <u>c</u> Change principle places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development.
Asset of Community Value	Land or buildings of local importance, nominated by local community groups. When these assts come up for sale or change of ownership it gives local community groups 6 months to raise money develop a bid before the asset can be sold.
Car Club	A flexible car hire scheme which provides a cost-effective alternative to personal car ownership.
Central Activities Zone (CAZ)	An area of central London designated by the London Plan in Policy SD4.

City Plan	Westminster's draft local plan 'City Plan 2019-2040' for the City of Westminster.
Community Infrastructure Levy (CIL)	A levy on development set per square metre by the City of Westminster to contribute towards improving local infrastructure. The funds are held by the City Council but local communities in all designated neighbourhood areas are entitled to 15% (capped at £100 per council tax payer) can be spent on local neighbourhood infrastructure priorities, and this rises to 25% uncapped once a neighbourhood plan comes into force.
Conservation Area	A Conservation area is an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. The majority of Soho sits within the Soho Conservation Area.
Consolidation	Methods of grouping together items and products for delivery which reduce the number of individual vehicle trips which need to be made to an area.
Creative Industries	These are industries which are defined in Westminster's City Plan on page 167 as being creative in content, experience, originality or in service.
Entertainment Uses	These are business uses classified in planning terms as A1 cafes, A3, A4, A5, D2 and entertainment uses with a mix of these uses. See glossary entry on 'use class'.
Gross Value Added (GVA)	Gross Value Added (GVA) is the measure of the value of goods and services produced in an area, industry or sector of an economy.
Last Mile Delivery	Ways of delivering goods which seek to minimise the use of fossil fuel delivery vehicles.
Major Development	Development greater than or equal to: • 10 residential units • 0.5 hectare site area (residential) or 1 hectare (non-residential) • Gross floor area of 1,000 sqm (GIA)
Micro Consolidation Centre	A building or facility where goods and parcels can be consolidated together to allow clean and low energy distribution of those deliveries.
Social and Community Uses	These are as defined in paragraph 18.1 of the WCC draft Local Plan 2019-2040.
SME	Small and medium sized enterprises.
National Planning Policy Framework (NPPF)	The national planning policy document which sets out the Government's planning policies for England and how these are expected to be applied.
Soho Special Policy Area	An area defined on a map in the City Plan within which special policies will apply and as described on page 74 of that plan.
Substantially Taller Buildings	<del>Are those which are proposed to have a height which is over two additional storeys to that existing, but which respect the surrounding townscape and building heights and do not materially exceed them.</del>
Tall Buildings	Tall buildings are defined in the City Plan as <b>buildings of twice the prevailing context height or higher or those which will result in a significant change to the skyline</b> <del>those buildings that are more than twice the prevailing context height or over 30 metres whichever is the lower</del> . Within Soho the prevailing context height was defined in the AECOM Heritage and Character Assessment as being four storeys.
Tottenham Court Road Opportunity Area (TCROA)	An area defined in the London Plan and the Westminster's <b>City Plan Local plan</b> to allow regeneration and growth. Part also lies in LB Camden.
The Council	An abbreviated name for Westminster City Council.
Use Class	A set of government regulations, the Use Classes Order 1987 <b>(as amended)</b> as that defines land use for the purposes of planning and divides business activity into specific categories and which normally require planning permission for change of one use to another.

## **9 Evidence Base**

### **A All Online References**

These are available via the links for each numbered reference and each complete document can be found on the plan website [www.planforsoho.org/documents](http://www.planforsoho.org/documents) . All links to references were checked on 11th December 2019.

## **B Other references in the plan not available on the internet are given below**

### **Reference No 5 Regarding numbers of employees commuting to Soho**

**An e**Email from WCC 1.10.19 gives the figures for the 3 LSOA areas that covers Soho and estimates 71,000 with a margin of 10,000 either way.

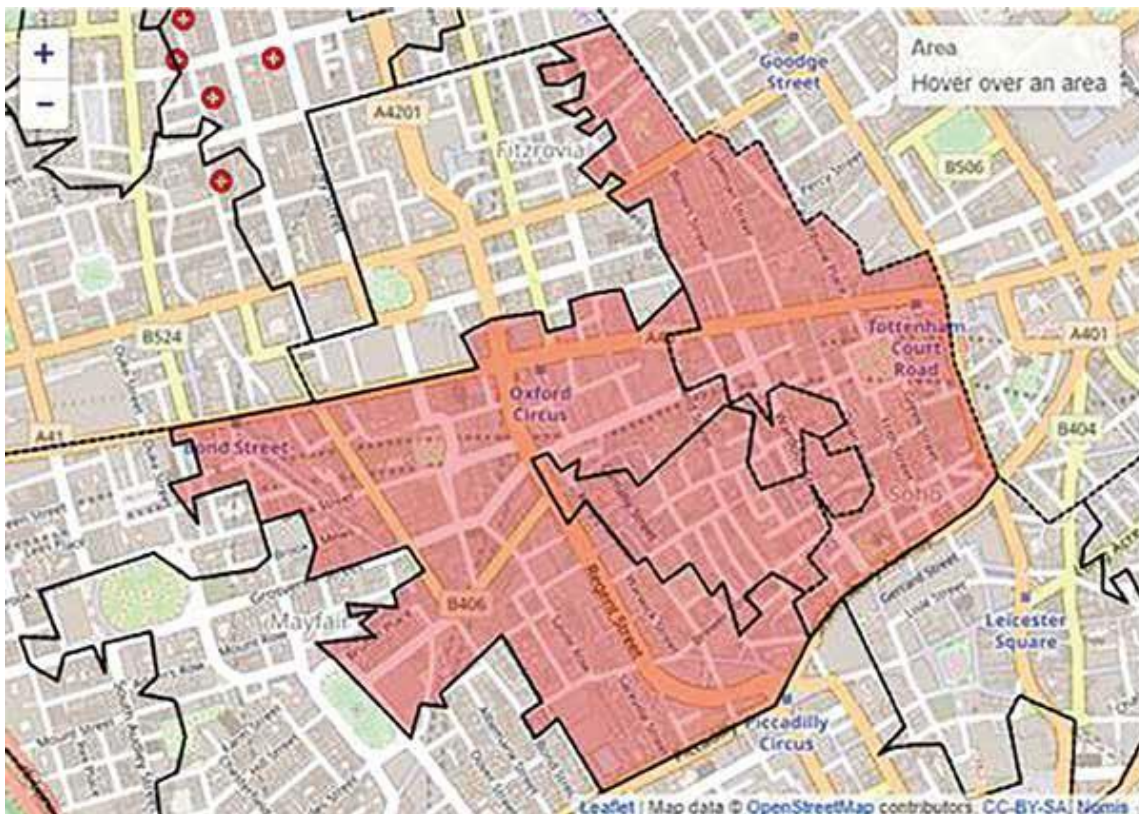
*Hi – there are 3 LSOA that make up Soho (and a lot more). The Business Register of Employment Survey – gives jobs at no lower level than this.*

*On the basis of (what is only an estimate of) the proportion of jobs within two of the 3 LSOA's that might be in Soho – you get a job total of around 71k, Source BRES, 2018.*

*Its not great, and I would allow for a margin of error – of 10k either way. If you think the proportion's of each area included as Soho should be amended let me know*

*Kind regards*

LOWER SUPER OUTPUT AREAS	EMPLOYEES	PROPORTION OF AREA THAT ARE SOHO BUSINESSES	SOHO CONTRIBUTION
E01004763 : Westminster 013B (right HS)	35,500	0.5	17750
E01033595 : Westminster 013E (Left HS)	74,500	0.5	37250
E01033596 : Westminster 013F(middle)	16,000	1	16000
Area	126,000		71,000



**Reference No 9 From the Survey of London volume 33 the Parish of St Anne, Soho**

Page 1 General Introduction

in 1641 Anna Clerke, 'a lewd woman', was bound over to keep the peace after 'threatening to burne the houses at So: ho'. These houses stood on the east side of the modern Wardour Street, to the north of Bourchier Street. The word Soho is an ancient hunting call and there is evidence that hunting took place over the lands to the west of Wardour Street. With the passage of time what had originally been the name of a group of wayside cottages in the open country was extended to denote the streets and squares of the whole parish of St. Anne, which had been formed out of the parish of St. Martin in the Fields in 1686. As a vague geographical term Soho now also includes the part of the neighbouring **parish** of St. James between Wardour and Regent Streets, which was described in volumes 31 and 32 of the Survey of London. The present volumes describe the fifty three acres of the parish of St. Anne, together with the ground on the east and south sides of Leicester Square.

Soho is the most famous of London's cosmopolitan quarters. Its geographical situation on the threshold of the West End makes it much more widely known to visitors, both native and foreign, than Whitechapel or Hampstead or Brixton, and indeed the popularity of its

restaurants and food shops almost entitles it to be considered as an integral part of the West End. It is also the oldest of the alien quarters. For nearly three centuries its foreign element has been periodically replenished by new immigrants, whose presence, if only as workers (for many of them now live elsewhere), still gives the street life of the locality its peculiar timbre.

Soho has always been foreign since its original development in the latter part of the seventeenth century, but this is not and never was apparent in the outward aspect of its buildings. The existence of an alien community has hardly affected the topographical and architectural development of the area, which has followed the usual confused and tortuous path, similar in essence to that of any other contemporary London suburb.

As elsewhere, the pattern of the street layout in Soho was, and still is, greatly influenced by the course of the highways and of the field or estate boundaries which existed before large-scale

building began. Almost all of the future parish of St. Anne was bounded by ancient highways, the only exception being at the south-east corner. These highways are now known as Oxford Street on the north, Charing Cross Road (northward -of Cambridge Circus) and West Street on the east, and Wardour and Whitcomb Streets on the west; another highway, now part of Shaftesbury Avenue, extended east to west across the centre of the area. They are shown on the plan of 1585 reproduced on Plate 1a. Some of the ground fronting these highways had already been covered with irregularly grouped, poor-quality houses before development of the land behind began in the 1670's—in modern terms, extensive ribbon development had taken place. When building on the back land began, it was evidently sometimes difficult to obtain access.

## **Reference No 28 Conversation with UK Screen Alliance, personal details redacted**

Note of meeting with UK Screen Alliance 18.4.18

Conversation started on what the pressures facing the industry

Response.

Noise is a big issue, below ground with Crossrail around 200 noise insulated rooms in the industry along the central part of Crossrail. Shock absorbing rail used in Bond St TCR section. Issues of compensation agreed if disturbance when it opens in December. But hopes and expects it will be OK. Above ground ambient noise levels are rising. Demolition/development can cause substantial noise and vibration. If recording audio with high earning names not economic to have to repeat because noise of jack hammer in the background. Example of GPE development in Broadwick Street had severe effect on digital company in Livonia Street to the rear.

Suitability of space Landlords prefer to let space fitted out, but the industry needs shell condition to install all round noise insulation so have to strip out landlords' fittings and then re install at the end of the lease. Wasteful and costly. Generous floor to ceiling heights a key to the space being suitable to insulate properly.

Rent and Rates Recent rates increases very steep and no benefits back into the area or the industry but recognises this is a national issue.

Rent levels are an issue but with the 5-year review cycle most expect the first years after review to be hard but inflation reduces the effect each year and in the last couple of years it evens out. Most in the industry grin and bear it. Some moved to Hoxton a few years ago but rent and rates then raised there so that stabilized.

Staffing This is a young industry and staff like to be in Soho and central London and like the buzz. Good travel connections to Soho. Most businesses very cautious about moving away because of this and because of the benefits of being part of an established cluster. Important to be part of a critical mass of employees who can if necessary move between jobs in the industry as work ebbs and flows. Originally centred on Wardour Street but it is spreading north of Oxford Street to Fitzrovia and further e.g. Framstore moved to Chancery Lane. Some specific functions needing lots of space to create sets etc will move to places like Dagenham.

Competition Fierce competition between companies but also prepared to collaborate and be collegiate to benefit and enhance the industry.

Planning policies Not a significant inhibitor. Knows the space is just B1 office space and that can't protect individual businesses. Supported by letter Westminster's bid for Creative Enterprise Zone.

Would welcome words/policies in the plan to promote/enhance support creative industries but recognises can't protect and that it would inhibit businesses if they could dispose of their space as and when they need to. Still demand to locate in central London.

More generally knows the area needs to change and evolve plus for some of the buildings in the area need to be improved or redeveloped but felt it not good that Film House is going to become a hotel



and noted the loss of the iconic Trident Studios in that building. Understood that hotels have been promoted by London and Westminster's plans.

Power Lack of sufficient power and substations in the West End a real problem and the fact that UK Power Networks do not proactively enhance capacity.

Digital speeds Not good, but not bad. Better digital communication has changed things in that some sectors, for example visual effects, can be located in other areas where cheaper to create banks of computer programmers working together and often in cooler climates where cost of keeping computer and servers cool is less and access to power easier. Example of one film which required the equivalent of 4000 years of visual effects if done by a single programmer but split up between many it was achieved in months.

Need for skills training Does not believe Soho's 'coffee culture' is sustainable AI will automate many jobs and make thousands redundant but creative industries most difficult to automate so we should be encouraging many more local people to acquire appropriate skills. Also, Brexit effect 3% of employees have come from EU and 13% from elsewhere so we must have more home-grown talent. But starting wages of £16-18k make the cost of establishing a place to live in reasonable commuting distance difficult because of cost of housing and travel. Would like to see a centre of excellence established in former school keeper's cottage area of Kingsway College discretely linked back to WCC's proposed innovation centre in Ingestre Court.

Keen that the WCC is properly and independently managed not buy a digital company who might skew occupancy and activity to benefit themselves. Example of this in Manchester with a development company Peel Holdings and the BBC the anchor tenant who gave a minimum annual guarantee of work to Peel and diverted work to other tenets in the building undercutting and putting out of business established digital businesses in the North West.

Value of the industry Latest figures show value to be more than 92 billion (and Soho Create study with Bop in 2014 showed 7 billion generated in Soho alone).

3 Of 6 largest digital global effects companies based within three miles. Contributed to winning Oscars in 6 of last 10 years. Drop in pound post Brexit has fueled work but that boost dropping out now.

### **Reference 37 List of Soho Clubs**

List of Soho Clubs as at 31.10.2019

Soho House, 40 Greek St, W1D 4EB Soho House, 76 Dean St, W1D 3SQ Groucho Club, 45 Dean St, W1D 4QB Blacks Club, 67 Dean St, W1D 4QH Century Club, 61-63 Shaftesbury Av, W1D 6LQ Union Club, 50 Greek St, W1D 4EQ House of St. Barnabas, 1 Greek St, W1D 4NQ Quo Vadis, 26-29 Dean St, W1D 3LL The Court, 9, Kingly St, W1B 5PH Milk & Honey, 61, Poland St, W1F 7NU Gerry's Club, 52, Dean St, W1D 5BJ The Academy, 46 Lexington St, W1F 0LP The Piano Bar, 16 Carlisle St, W1D 3BT Trisha's, 57 Greek Street, W1D 5LD Soho Whisky Club, 42 Old Compton St, W1D 4LR Disrepute, 4 Kingly Court, W1F 9RR Trade, 23 Frith St, W1D 4RR

### **Reference No 78 Email from DHL personal details redacted**

Yes, it can work for micro consolidation for parcels for local deliveries and it is something we would really welcome. The locations look good. As you say there are many land pressures in London and being centrally located is critical for the deployment of electric vehicles and cargo bikes as well as general efficiency due to reduced stem mileage.

We would need to know the detail on the size of the space (rekitting is less of an issue as you say this would have to be done anyway) as well as the vehicle access size. I would have to refer to colleagues to see whether 7.5tonne would be an issue; ideally we would prefer something a bit bigger.

Hope that helps – please do keep us in touch as things develop.  
Best wishes

**Sent:** 06 November 2019 16:47

**To:**

**Subject:** RE: Draft Soho Neighbourhood

Plan -freight consolidation

First the neighbourhood plan still has a number of stages to go through and will not be adopted for probably a year.

No, I have none of the details of the premises themselves at this stage. Clearly works would be required to adapt all or part of these garages if a logistics company took them on. The NCP in Brewer Street does have an open private forecourt which would help in that case. But in both cases I suspect it won't work for a model using large tractor units and trailers, so deliveries before consolidation for final delivery would come in 7.5 tonne vehicles or smaller.

My question was more whether logistics companies would find it attractive to operate from locations in the West End which are very close to where the end businesses are so that the 'last mile' element can be made using low impact methods such as cargo bikes, porterage and the like or would they all prefer to be a bit further out? Perhaps closer to arterial roads or where they might find larger warehouses on industrial estates to consolidate and deliver from there?

Because everywhere in an area like Soho has high land values and is already intensively developed, public car parks are about the last locations where local micro consolidation could be located if there is demand from the logistics industry, or parts of it, to be right in the centre. So does that business model work? I don't know the detail but Tom Parker told us that the City are converting all or part of a public car park there for micro consolidation so I would like to find out if using premises in central locations like Soho would also work?

Any actual proposal would need to look at a public car park in depth to see if the costs of adaptation fits into the overall business case.

## **10 Recommendations and Projects**

The **Recommendations**. These set out a series of non-statutory but highly recommended actions to third parties. They have not be prioritised. Whilst they are not land use planning policies, they are specific recommendations to Westminster City Council, Transport

for London (TfL) and other bodies to complement the land use planning policies of Part 1 to help realise the Forum's Vision for Soho. They also respond to the issues raised during the public engagement process.

Good and effective public engagement raises a wide range of views about an area which are important in the minds of people in the local community who do not always realise what is or is not land use planning and what can properly fit within a neighbourhood plan. It would betray that public engagement if those views once raised were simply ignored and unmentioned.

The recommendations are based on the aspirations set out in the Consultation Statement and the **pPlan** itself that evolved from the widespread views expressed during the various stages of consultation. They give expression to those aspirations which are not strictly land use planning matters and therefore could not form part of the statutory **pPlan**.

Each recommendation is clear as to the body or bodies it is addressed to. It is accompanied by the level of priority and indicative timescale that the Forum believes is appropriate for each to be achieved. These are divided into three time periods from the

date the plan comes into force.

Immediate - within 12 months Medium - between 2 to 5 years Long - until the end of the plan

Some recommendations are also described as Ongoing because once adopted they should continue to be implemented throughout the life of the plan.

Of course, it is entirely up to the body addressed as to whether or not to adopt a recommendation, in whole or in part, and the time period over which they implement that recommendation but these are time scales the forum believes would best help to make the plan's vision and aspirations a reality.

## 1 Culture, Heritage and Creative Industries

**1:** Westminster City Council should update the 2008 Soho Conservation Area carrying out a street by street audit of Soho. This should include an updated record of buildings including unlisted and other buildings of merit.

In addition, assets of community value and commemorative plaques should be recorded.

**Timescale:** Immediate

**Reasoning:** The Soho Conservation Area Audit was carried out in 2008 and there have been huge development pressures since then. The audit should be reviewed and updated. The review should assess whether further unlisted buildings of merit should be added. The need to update the list is emphasised in light of early summer 2019 plans to demolish Twentieth Century House in Soho Square. There was overwhelming endorsement from the Forum's survey for protecting all aspects of Soho's heritage including those protected by designations of being assets of community value and those buildings on which blue and green plaques record people and events in Soho.

**2:** Developers should consider locating within the SNA a permanent home for the Museum of Soho in recognition of the role it plays in collating the intangible spirit of Soho.

**Timescale:** Medium.

**Reasoning:** The Museum of Soho is currently an online museum. It has very limited financial resources to improve and expand its work. It should be possible as part of the benefits of development to identify space in which to house the Museum's artefacts and potentially have an exhibition space open to the public. Such a proposal may potentially be facilitated by strategic and neighbourhood CIL money.

**3:** The **P**lan recognises the role that the sex industry played in the heritage of Soho and recommends that the Museum of Soho documents the history of the Sex industry and the role played in the history of Soho in full.

**Timescale:** Medium

**Reasoning:** Although now much of the sex industry has disappeared, moved to other areas or gone on line this 'industry' has had a big impact on establishing the Soho's character and reputation as well as influencing property ownership patterns and investment over the decades following the Second World War and the Museum of Soho should document and record that activity as well as the emergence of the LGBTQ+ economy as time and resources allow.

**4:** Westminster City Council should explore opportunities to use its rate reduction powers to support start-ups and SME's which make a clear contribution to the creative industries.

**Timescale:** Immediate

**Reasoning:** Start-up businesses and small SMEs are vital to exploring new ideas and concepts and renewing the creative industry sector within Soho, but budgets and cash flow are often tight and where they are possible support through rate reductions can offer useful support.

**5:** Westminster City Council should explore utilizing Soho's resources to encourage emerging talent and the continued Oscar success enjoyed by Soho over the last 10 years.

**Timescale:** Active within 2 years of plan publication.

**Reasoning:** This recommendation follows up the recommendation of the BOP Consulting's creative industries report Soho - the world's creative hub

**6:** Westminster City Council when considering new development proposals wherever possible should incorporate creative installations reflecting the Soho neighbourhood.

**Timescale:** Ongoing

**Reasoning:** It is recognised that it is not always relevant, feasible or appropriate to have art on or in a building, so the development industry should support artistic provision in a variety of forms, such as the use of innovative technology. As an example, Carnaby Echoes was a walking tour around Carnaby linked to an App showing the musical history of the area.

## **2 Commercial Activity**

**7:** Developers and landlords should recommend whenever possible multiples and branches of brand chains to locate on the boundary streets of Soho in order to protect the areas' existing retail character.

**Timescale:** Ongoing

**Reasoning:** Soho should be a home for independent and SME businesses and large multiples and branches of chains are best located on Oxford Street, Charing Cross Road and Shaftesbury Avenue.

**8:** The Soho Society should develop a Soho 'loyalty card' for residents and people who work in Soho, to encourage them to shop in the independent businesses based in Soho.

**Timescale:** Medium

**Reasoning:** The Soho Society should create and maintain a database of existing independent retail activity engaging with owners and freeholders to encourage retention of those with community value i.e. those businesses which offer goods and services of value to the residential community. This initiative reflects the call to support local amenities and shops which cater for the residential population, a loyalty card could provide the means of doing so. This may also provide way of encouraging more independent businesses alongside heritage businesses that make Soho unique.

## **3 Entertainment Venues and the night- time economy**

**9:** Concerned local groups and organizations should consider using the Asset of Community Value process by to help protect against the loss of valued local facilities.

**Timescale:** Ongoing

**Reasoning:** Local and Community groups value this power as encouraging property owners to think again about their proposals if they would mean the loss of existing local assets such as live music venues.

**10:** Westminster City Council should consider implementing the Night-Time Levy if it is amended by Parliament to better focus the levy on those premises causing problems and provide additional resources to effectively manage crime, disorder and anti-social behavior.

**Timescale:** Scheme to be adopted by WCC once the legislation for the night-time levy is reformed.

**Reasoning:** The levy should be reformed to clearly focus on these issues and target the licensed premises causing them, it should be implemented by

WCC within the Soho Neighbourhood Area. NB This is on the proviso that the changes to the Levy recommended by the parliamentary select committee report are adopted in order to target specific areas such as Soho, the premises which are linked to large numbers of incidents relating to crime and anti-social behavior and to avoid adding further costs to well-run small historically significant local businesses and cultural venues. <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN07100#fullreport>

**11:** Developers, landlords and occupiers are encouraged to consider the impact of anti-social behavior on residents and visitors to Soho by putting in place effective lease provisions and management policies to require their tenants to implement measures which make them good neighbours to other surrounding occupiers.

**Timescale:** Immediate and ongoing.

**Reasoning:** Planning policy can only achieve so much in attaching conditions to individual planning permissions.

Responsible landlords should review leases to see if they can be amended to contain provisions which both encourage and require their tenants to implement policies which are likely to reduce crime and anti-social behavior such as taking responsibility for their customers including their dispersal when leaving the premises.

**12:** All existing premises licence holders are recommended to sign up to a voluntary code of conduct or review their licenses and voluntarily apply to amend their premises licenses to reduce the impact on residential amenity at night by ensuring that waste and recycling collections for uncrushed bottles, only take place between 07.00 - 23.00.

**Timescale:** Medium – Target review all historic licenses in Soho by end 2020.

**Reasoning:** The collection of uncrushed bottles is a very noisy activity and a great cause of noise nuisance to those living in the area. Where there are applications to the City Council to vary licenses, it is recommended that the licensing service requests applicants to accept the Council's model condition on this issue. With regard to reviewing existing licenses, which have no such condition in place, we recommend that this may be an activity that the Soho Society Licensing team could undertake on WCC's behalf where the addition of a model condition to the license is uncontested.

**13:** Westminster City Council should consider and support the recommendation to the Government put forward by the House of Lords Select Committee on the Licensing Act 2003 - stating "Coordination between the licensing and planning systems can and should begin immediately in all local authorities".

**Timescale:** Immediately if this recommendation is adopted by central Government

**Reasoning:** In order to achieve better alignment between planning and licensing the section 182 Guidance accompanying the Licensing Act 2003 should be amended to make clear that a licensing committee, far from ignoring any relevant decision already taken by a planning committee, should take it into account and where appropriate follow it; and vice versa (paragraph 246 of the House of Lords report).

**14:** Westminster City Council should carry out an assessment of the current visitor numbers to

Soho including planned annual public events (e.g. Pride and Record Store Day), to ensure that sufficient publicly accessible toilet provision is made as part of development to enable further license applications to be granted without increasing street fouling and enhance public amenity.

**Timescale:** Immediate and ongoing

**Reasoning:** Anti-social behavior in the form of street fouling is on the rise across Soho, correlating to a decrease in the number of public toilets across Westminster. Planned public events and an increase in the number of licenses need to be mirrored by an increase in adequate public amenity provision.

#### 4 Housing

**15:** Westminster City Council should review and revise the terms and administration of the Affordable Housing Fund as follows. Where exceptional payments in lieu of affordable housing are made into the Affordable Housing Fund as a result of development within the SNA, a minimum 33% of the total should be spent on affordable housing within the Soho Neighbourhood Area rather than elsewhere, as assessed over a five-year running average.

**Timescale:** Immediate

**Reasoning:** We understand that a majority of the AHF funds generated by these means in the SNA are spent in other parts of the City or elsewhere where the costs are lower in order that more housing is delivered from the sums involved. However, in order to ensure that Soho itself achieves some benefit from the funds so generated it is important that a proportion of those funds are spent within the area from which they are generated. Such expenditure helps maintain public faith in the system and sustains the diverse residential community that is part of Soho's character. It is important that there continues to be a range of affordability in the rented sector, as well as a variety of types and sizes of accommodation.

Many of those with connections to or working in Soho and the immediate vicinity are in occupations where they work long, or unsocial, hours and housing provided close to their place of employment would be a considerable contribution to their health and well-being. Many are in forms of employment that are not sufficiently well paid to meet the cost of market rents. Therefore, the provision of housing let at intermediate rent levels will help to broaden the housing mix of the area.

**16:** Registered providers delivering developments which include both private and public housing should normally provide shared entrances and lobbies unless there are exceptional circumstances.

**Timescale:** Immediate and ongoing

**Reasoning:** The cost of providing social housing increases and the amount of liveable space is reduced in housing developments with mixed tenures where there is a design or marketing requirement that each tenure type must have a separate entrance, and staircase/ lift facilities. Social housing tenants do not pay an explicit service charge. It forms part of the overall rent. If the leasehold element of the joint scheme provides additional facilities such as a concierge or high specification common parts, then the cost of the service charge rises for all who use those common parts. It is not practicable for social housing providers to take on this cost within their rental charge and so this is often avoided by the provision of a second service core which is cheaper to maintain but has the socially divisive effect of separating occupiers from one another. In Soho there is great cost and pressure on land and space.

Since a separate core does not make effective use of the land available nor is it socially inclusive in line with the character of Soho, developers in such joint schemes should design the entrance core in a way and at a cost that allows it to be shared and maintained by all occupiers.

**17:** Westminster City Council should continue to prioritise enforcement against the use of residential property for holiday lets beyond the permitted 90 days annual total, in order to maintain permanent residential living in Soho.

**Timescale:** Ongoing

**Reasoning:** The use of short-term letting is very profitable as Soho is set in the heart of the capital city and it is increasingly used as a strategy to provide a substantial financial return to property owners and occupiers. Short term lets can cause many adverse impacts to permanent residential neighbours and to the overall sense of community. They also prevent units being used as much needed permanent homes. At a time of national housing need and local demand and when the stability of Soho's residential community faces significant challenges it is important that premises designated for residential use achieve that purpose in practice.

**18:** Westminster City Council should encourage development which involves refurbishment of buildings or additions to them rather than demolition and reconstruction.

**Timescale:** Ongoing

**Reasoning:** Complete demolition and construction of a new building on a site causes huge disruption and nuisance to both the immediate neighbours in terms of noise and dust etc and to the wider area in terms of road diversions and congestion. Refurbishment will reduce these impacts. In addition, environmentally it is a very wasteful option that destroys the embodied energy and materials in the previous construction and then uses new materials and energy to replace it. Any savings that can be achieved by using in whole or in part foundations, frame and structure should be an objective of Westminster's planning policy.

**19:** Developers and Westminster City Council should consider together the cumulative negative impacts that can occur when a number of developments take place in similar timescales in the same locality and, where possible, find ways on a voluntary basis to phase certain elements of construction to minimise diversions, road closures and other negative impacts on the local community.

**Timescale:** Immediate and ongoing

**Reasoning:** Diversions, road closures and congestion from large vehicles are a regular consequence of development. When large developments occur in close proximity these problems can become intense. WC should take the lead in establishing a voluntary system of phasing between the parties and the

Council as well as the consolidation of the delivery of construction materials in order to reduce this disruption and also help to ensure that each development proceeds smoothly. This might be achieved through a new section to the Code of Construction Practice.

**20:** Developers providing new housing should ensure design provides good residential amenity and, in particular, pay particular attention to providing sound insulation measures which protect premises from the external noise of night-time activity.

**Timescale:** Immediate and ongoing.

**Reasoning:** Noise impacts are an inevitable part of being a busy mixed-use commercial area which operates 24/7. Good double and sometimes triple glazing can help although in the face of climatic change there is also a need for good ventilation to help reduce internal temperatures in summer.

**21:** Westminster City Council should ensure that new planning consents for all development include a condition that limits deliveries and waste collection to take place only between 7am and 11pm.

**Timescale:** Immediate and ongoing.

**Reasoning:** The World Health Organisation and other academic and medical studies show the importance of sleep and preferably uninterrupted sleep to mental health and well-being.

Westminster City Council planning policy and the conditions attached to planning consent should be mindful of this objective to ensure that night-time noise is not increased by development and wherever

possible reduced.

**22:** Planning consent for new A3, A4, A5 and D uses should include a condition that occupiers must prominently display specific standard notices – with a unique design and branding for Soho - alerting patrons to the need to respect local residents on leaving.

**Timescale:** Medium.

**Reasoning:** Soho has a high concentration of food, drink and entertainment establishments. In the later evening and at night the noise from customers leaving can cause nuisance and newly developed premises should take suitable measures to encourage their patrons to leave quietly. Currently, when printed signs are used, they appear to have limited effect, so a unique Soho design could help to develop a night-time culture that respects the neighbouring residential community.

**23:** Westminster City Council should review the work of its noise team and other enforcement resources to see how the service it offers can improve the speed and effectiveness of the service it offers especially between 23.00 and 07.00.

**Timescale:** Immediate

**Reasoning:** The work of the 24hour Noise Team is recognised as a real benefit to residents and neighbours but there are delays in the present system which disincentivise those woken at night by noise from contacting them. The system for this needs to be as simple and direct as possible. Waiting up in the middle of the night for phone call or visit further adds to sleep disruption in a number of ways. The Council should examine whether there are methods to validate and investigate complaints which lessen the disruption to those affected by noise nuisance.

**24:** Developers should be encouraged to include measures to reduce street urination in their applications, where possible, through building design, good lighting and the provision of portable and permanent on-street pissoirs in appropriate locations identified by the council.

**Timescale:** Immediate

**Reasoning:** Public conveniences close in the late evening and at night as do most venues which allow the public to use their toilets. The staining and smells associated with public urination are unpleasant to residents, workers and visitors alike and wherever possible measures should be put in place to minimise this anti- social activity.

## 5 Environment

**25:** Westminster City Council, Transport for London and Government departments should install air quality monitoring stations which record data to a standard recognised by them as a matter of urgency in at least 2 locations within the SNA. One of these should be sited as close as is practically possible to Soho Parish School.

**Timescale:** Immediate

**Reasoning:** One of the major barriers to proportionate and effective policy interventions is the lack of reliable data. There is a chronic lack of local data on air quality and the provision of air monitoring equipment would allow measures to be accurately targeted. A survey in January 2017 supported by the Soho Society using diffusion tubes placed at various heights found that those at one metre high showed the highest level of pollutants. This is the height at which very young children in push chairs are at and also children walking to school.

**26:** Westminster City Council should designate Soho inside the major boundary streets of Oxford Street, Regent Street, Shaftesbury Avenue and Charing Cross Road as a 20mph area and also widely sign post it as a 'Pedestrian Friendly Area'. Consideration should be given to designating certain streets as 'pedestrian only' at certain times of the day using such measures as retractable bollards to ensure compliance.



**Timescale:** Immediate to Medium

**Reasoning:** Levels of pedestrian use across Soho are already high. Walking strategies by the Mayor and WCC aim to increase the percentage of trips made on foot and the opening of the Elizabeth line will bring many thousands of additional pedestrians to the area. Reducing traffic volumes and their speeds is a necessary response. This is best tackled on an area basis so that Soho becomes known to all users as a pedestrian friendly area where vehicular movement is restricted and slow so that over time inessential vehicle journeys reduce. On-street signs and notices within Soho which restrict types of traffic (e.g. to delivery and emergency vehicles or private vehicles in exceptional circumstances only) are a less satisfactory solutions as they are often ignored, and enforcement is a resource intensive process.

**27:** Westminster City Council should facilitate the early installation of at least 50 on street electric vehicle charging points that are affordable, reliable and offer open access. They should continue to increase provision as the use of electric vehicles increase. Of the initial fifty, 10 should be in paid for parking bays, 10 in designated residents' parking bays, 10 in designated loading bays and 10 each in the garages at Poland Street and Brewer Street. These garages may also be suitable locations for some rapid charging installations. Electric vehicle car sharing clubs should be promoted and encouraged. **Timescale:** Immediate to Medium

**Reasoning:** Major changes in the fuels used to power vehicles is necessary if air quality in the West End is to improve. A major barrier to take up is the perception that there is not a sufficient re-charging infrastructure. In order to facilitate the change to electric motive power WCC should lead the way in providing additional electric charging capacity.

**28:** Transport for London, Westminster City Council and major landowners should support initiatives to pilot and adopt freight consolidation and waste collection reduction measures in Soho. Initiatives such as the West End Buyers Club and other preferred provider schemes should be widely supported to help reduce vehicle movements. Initiatives in the restaurant and hospitality sectors are especially needed as a priority to help reduce light van movements.

**Timescale:** Immediate to Long

**Reasoning:** Development activity increases and intensifies the use of space within Soho yet the public realm to provide access and services to it such as streets and pavements stays broadly the same and so has a fixed capacity.

To prevent further congestion, let alone reduce it, measures need to be taken to eliminate unnecessary vehicle movements.

**29:** Westminster City Council together with landlords and occupiers should seek to restrict or redirect online shopping deliveries/returns to specific locations to reduce vehicle congestion.

**Timescale:** Immediate to Long

**Reasoning:** Given the area's high number of employees, online shopping which often offers so called 'free' deliveries, usually by small vans, is an important source of congestion. Measures to change behaviour among the 650,000 employees who work in the West End and have deliveries made to their place of work in an uncoordinated way are important if congestion is to be reduced.

**30:** Westminster City Council's awareness-raising and enforcement patrols which are carried out to prevent vehicles idling unnecessarily should include the issuance of fixed penalty notices where necessary as advisory warnings can easily be ignored or forgotten.

**Timescale:** Immediate to Long

**32:** Westminster City Council should support traffic calming in Soho's narrow streets. These also tend to have narrow pavements and high pedestrian use. Investment should be made by Westminster City Council to resurface appropriate streets with high quality, robust, level shared surfaces built so that pre-existing public pavement space can withstand the same axle weights as

the carriageway. In doing this it will be important to ensure basement vaults are protected. The carriageway should still be delineated by indicative 'kerbstones' and the carriageway asphalted or otherwise treated to make clear the line of the actual carriageway.

**Timescale:** Immediate to Long

**Reasoning:** There are no simple solutions and the approach should be based on 'street by street' and 'activity by activity' assessment of the measures that will practically support this aspiration.

Soho's narrow street pattern increases the risk of congestion and means that in order for the traffic to flow, whilst some vehicles are parked to make deliveries, others pass them with one set of wheels on the pavement. This results in costly paving slabs often breaking, rocking and becoming a hazard for pedestrians very quickly. As an example, in North Berwick Street in May 2018 expensive and lengthy repaving works have all had new paving slabs cracked within a few weeks of being completed. This is neither value for money nor a sustainable solution.

Shared surfaces will improve the ability of vehicles to pass others without pavements being constantly broken and degraded as at present.

**33:** Transport for London and Westminster City Council should review those buildings and sites which have the potential to offer opportunities to consolidate and distribute freight more sustainably. These bodies, alone or with suitable partners, should trial the reuse of underused space in local car parks for transfer from delivery vans to 'to the door' delivery on foot or by bicycle/ tricycle.

**Timescale:** Immediate

**Reasoning:** Soho is intensely commercially developed and there are no opportunities to develop new sites for freight consolidation centres other than pre-existing multi storey car parks. Demand for car parking has reduced as a result of the Mayor's Congestion Charge and is likely to reduce further following the introduction of the Ultra- Low Emissions Charge. These buildings have the potential to incorporate new uses which help to make the traffic modal shift required to reduce both air pollution and congestion. The City of London Corporation is using former car parks as an innovative way to consolidate freight and WCC should follow suit and protect these garages in the short term from change of use to other commercial uses so that these new ways of delivering goods and freight can be piloted.

It should be noted that the delivery company DPD has recently received planning consent at Q Park, Hyde Park Corner for such a centre so this is an indication of the potential demand.

**34:** Westminster City Council should sign all entry streets to as no entry for vehicles over 7.5 tonnes except for access in order to prevent large vehicles taking shortcuts through the area.

**Timescale:** Medium

**Reasoning:** Unfortunately, a number of satellite navigation systems still direct traffic through Soho rather than around it and the Council should engage with the providers to change these systems. However, there is nothing in this recommendation to inhibit theatre show 'get-ins and gets outs' and other special activities involving increased delivery and supply needs, such as live broadcasts.

**Reasoning:** The Marylebone Low Emissions Neighbourhood has trialled a campaign to stop vehicle idling and achieved some success. It should be replicated in Soho but there is little evidence that behaviour change is occurring amongst drivers from an entirely voluntary approach.

**31:** Property owners and occupiers should be encouraged to upgrade existing boilers such that all meet the "ultra-low NOx" standard of less than 40mg/kWh of NOx by 2025 and also provide their users running cost reductions.

**Timescale:** Medium to Long

**Reasoning:** Adopting ultra-low emission boilers will help to reduce harmful emissions and move Soho towards a low carbon economy.

**35:** Westminster City Council and Transport for London should support the shared use of pavements for loading/ unloading where they are wide enough.

These areas should be remodelled to provide shared surface loading bays whilst also remaining usable by pedestrians.

**Timescale:** Immediate to Medium

**Reasoning:** In suitable locations and following careful assessment the pavements should be widened to both give more space for pedestrians and to include shared surface loading/ unloading bays where the street width allows. Potential opportunities are on the west side of Wardour Street between Shaftesbury Avenue and Winnett Street; further up Wardour Street on the west side outside numbers 143 and 145; along the whole length of Old Compton Street there are opportunities to widen pavements and incorporate shared surface bays, on Noel Street south side outside numbers 14 to 21a. All proposed locations will need a detailed layout assessment. There should be an assessment of the entire length of Great Marlborough Street to see where pavements can be widened, and bays incorporated.

**36:** Westminster City Council should prepare and issue planning guidance and best practice case studies as 'how to...' guides to recommend that simple, low cost and low maintenance greening measures are provided as a required and normal part of development proposals within the SNA. This should include green roofs or walls where possible and practical but on smaller developments sedum pods, window boxes and small- scale planting elements such as tubs and pots should always be provided.

**Timescale:** Immediate to Medium

**Reasoning:** Whilst the impact of each initiative in itself is small, the collective impact on air quality, ecology and a sense of well-being has been shown to be material. Westminster City Council should proactively prepare and deliver greening guidance as part of its standard pre- planning application advice in order to begin to move the development industry towards a green and low carbon Soho.

**37:** Westminster City Council should encourage developers and landlords to investigate the ground conditions forming part of development proposals within the SNA to provide growing space to allow for further tree planting and/or suitable wall climbing plants.

**Timescale:** Immediate

**Reasoning:** Green measures such as these have been shown to improve air quality. The 2015 Soho Green Infrastructure Audit highlighted a number of opportunities.

**38:** Westminster City Council and developers should investigate and implement improved ground level green infrastructure such as sustainable urban drainage systems, and rain gardens as suggested in the Soho Green Infrastructure Audit wherever possible. **Timescale:** Immediate to Long

**Reasoning:** Such measures help to increase bio-diversity and also improve air quality.

**39:** Westminster City Council should ensure that pedestrianisation of any selected streets should only be for limited times of the day and evening to prevent anti-social use late at night of such areas and to allow sufficient cleansing and servicing at night and in the early morning.

**Timescale:** Immediate to Long

**Reasoning:** Highways legislation is outside the scope of a neighbourhood plan, but specific public realm improvements are needed. There have been trials of pedestrianisation in Soho in earlier years which were not successful. This was because the closure hours were so long that an almost uncontrolled drinking and party atmosphere was created that caused significant noise, nuisance and

health risks. Late night use of closed streets also prevented effective servicing, maintenance and street cleansing. Successful schemes such as those operated in the Carnaby Street area by Shaftesbury plc which time the period of closure are preferred to 24/7 pedestrianisation schemes.

**40:** Westminster City Council should install more Legible London signage in accordance with the recommendations of the 2014 Soho Public Real study by Publica.

**Timescale:** Immediate to Medium

**Reasoning:** Whilst there is adequate signage provided as part of the Legible London scheme this is mostly on the larger boundary streets rather than with Soho itself and way finding for those unfamiliar with Soho's complex narrow street pattern could be improved.

**41:** Westminster City Council should renew and upgrade the public realm and street lighting in the side streets and passageways of the area as necessary to widen the range of safe thoroughfares which can be easily accessed by pedestrians to help relieve pressure on the main streets within the SNA.

**Timescale:** Medium to Long

**Reasoning:** With the opening of the Elisabeth Line it will be important to allow pedestrians to use and feel safe in the widest possible range of walking routes to absorb the increased number of visitors expected to the area.

**42:** Westminster City Council should adopt similar policies to keep pavements free from obstructions as are in Policy 17 of the City of London Corporation's Transport Strategy.

**Timescale:** Immediate

**Reasoning:** There are defined areas in which tables and chairs are licensed on the pavements but there are many other causes of obstruction which reduce the space pedestrians can use in Soho's narrow streets. Policy 17 on Page 52 of the City of London's Transport Strategy sets out a clear enforcement approach and lists the issues that will be tackled.

**43:** Westminster City Council should ensure that 100% of its drainage gullies are in working order and are free flowing. The council should set up a system which requires pre and post development survey of gullies to check that they are free flowing before and after development and not blocked by concrete run off and other debris.

**Timescale:** Immediate to Medium

**Reasoning:** Pedestrian accessibility is severely reduced during wet weather by the fact that many drainage gullies are blocked and have remained blocked for months and years. There are also significant areas of ponding due to uneven surfaces and poorly designed public realm works.

**44:** Westminster City Council should identify areas of significant ponding after rainfall and planned to be eliminated in future works to ensure a better walking environment during periods of rain.

**Timescale:** Immediate to Long

**Reasoning:** With the increased incidence of periods of sudden high levels of rainfall it is important to ensure that surface water can drain quickly in an area which has increasingly high levels of pedestrian movement.

**45:** Westminster City Council should require applicants for major development to consider as part of their proposals the provision and maintenance of well- designed and robust seating as suitable measures to enhance the public realm. Developments which do not make such provision without reasoned justification should not be supported.

**Timescale:** Immediate

**Reasoning:** Such public seating as there is mainly in Soho three open public spaces. On street seating such as that in Fouberts Place is always heavily used and is a good indicator of additional demand.

**46:** Westminster City Council and Transport for London should fund as soon as possible the improvements to the 10 streets identified in Chapter 6 of the 2014 Publica Soho Public Realm Study.

**Timescale:** Immediate to Medium

**Reasoning:** This substantial and authoritative study commissioned by TfL and WCC has yet to be implemented.

**47:** Westminster City Council and Transport for London should review the provision of cycle stands and aim to increase provision by a third across the area in suitable locations during the life of the plan.

**Timescale:** Immediate to Medium

**Reasoning:** Cycling is increasingly used for commuting and business trips and the Mayor's December 2018 Cycling Action Plan aims to further encourage cycling.

In addition to the existing parking stands and the Santander Cycle hire scheme the city council should aim to substantially increase safe and secure cycle stand provision for those using cycles in Soho.

**48:** Westminster City Council and Transport for London should reconsider whether dedicated contraflow cycle lanes can be achieved in Soho given the narrowness of most streets and the importance of having sufficient kerbside space for loading and unloading.

**Timescale:** Medium to Long

**Reasoning:** Soho's streets are mostly too narrow to accommodate dedicated contraflow cycle lanes without reducing already scarce kerbside space for deliveries.

**49:** Employers should be encouraged to provide staff with access to cycle stands, changing facilities and lockers within developments where on-site provision is not feasible by way of membership of local organisations, such as H2, which supply these.

**Timescale:** Immediate to Medium

**Reasoning:** In appropriate cases these measures can help to facilitate cycling use particularly for start-ups and SMEs.

**50:** Transport for London and the Metropolitan Police should review whether further enforcement and penalties are desirable to discourage aggressive and dangerous cycling.

**Timescale:** Medium to Long

**Reasoning:** Pedestrian use is the predominant use and some cyclists ride in ways that are risky to pedestrians, so management measures are also necessary to manage these tensions.

**51:** Westminster City Council should continue to support the TfL bike hire scheme and extend it to include electrically assisted bikes and discourage dockless bike schemes from operating within Soho.

**Timescale:** Immediate

**Reasoning:** Soho streets and pavements are narrow and congested and dockless hire bikes left on

pavements can add to congestion and obstruction. There are already indications that bikes are left indiscriminately on pavements and cause problems for pedestrians.

**52:** Westminster City Council should review on-street paid for parking bays and in the absence of other suitable locations reduced as necessary to provide additional space for suitably designed on-street waste and recycling storage containers to reduce bags of rubbish and cardboard left on the pavement. These should be well designed and have clear signage to indicate who can use them, suitable access technology to prevent freeloading, control the correct materials they should be used for and address how issues such as full bins and fly-tipping can be notified, and enforcement processes followed.

**Timescale:** Medium to Long

**Reasoning:** The amount of kerbside space in Soho is limited and heavily used for deliveries and collections. Rubbish dumped in bags on to pavements, many of which are narrow, is a longstanding problem. The forum wishes to see much better performance in preventing waste dumping and littering and a much higher percentage of waste separated so that it can provide economically viable materials for recycling. Occupiers producing waste must be able to dispose of their waste and recyclables in sustainable ways and WCC should investigate and promote innovative new ways to manage the problem and where necessary use part of the existing space made over to paid for parking to achieve these objectives.

There is proven technology to deliver and collect suitable containers from side loading vehicles.

**53:** Westminster City Council should establish the number of current recycling service providers and frequency of collections within Soho in order to reduce and optimise the number of vehicle movements and make service provision easier to understand (collection times, full bins and fly-tipping reporting etc). This should be followed by setting up preferred provider schemes to reduce the number of vehicles carrying out waste collections as has also been successfully achieved in Bond Street.

**Timescale:** Immediate to Medium

**Reasoning:** See details of the Bond Street scheme promoted by NVEC

**54:** Westminster City Council should review and update the time slots for waste and recycling bags being put out on the street to ensure that vehicle movements for Westminster City Council's municipal waste and recycling collection company's vehicles are minimised.

**Timescale:** Immediate to Medium

**Reasoning:** Reducing HGV compactor vehicle movements will help to improve air quality, reduce noise nuisance and make the collection of waste more effective.

**55:** Westminster City Council should adopt within Soho a 'smart' bin monitoring system to help to optimise the movement of the collection vehicles to empty them and ensure that bins that are full do not become fly-tipping locations. **Timescale:** Immediate to Medium

**Reasoning:** Smart bins provide important data to the Council and Veolia to target when and where bins need emptying.

**56:** Westminster City Council should seek to reduce street littering and food packaging waste in Soho by increasing the number of litter bins and recycling bins in a number of locations within the area which have none. Provision in all the public open spaces should be increased as a matter of priority. When such large-scale events as Pride are licensed there should be a requirement for the licence holder to provide very large waste and recycling bins intensively in the area affected by the event.

**Timescale:** Immediate

**Reasoning:** Waste which is disposed of in litter/recycling bins reduces the need for manual and mechanical street sweeping. Events such as Pride cause huge amounts of waste which can disfigure the area for a long time after the event and are environmentally unsustainable as large amounts of single use plastic, bottles, can and paper waste are mashed together by the press of people which make them unrecyclable. The polluter pays principle should be adhered to.

**57:** Westminster City Council should ensure those proposing development are aware of Westminster's 'Best in Class' Waste Storage Requirements.

**Timescale:** Immediate

**Reasoning:** see [http://transact.westminster.gov.uk/docstores/publications\\_store/planning/Waste\\_Storage\\_Requirements.pdf](http://transact.westminster.gov.uk/docstores/publications_store/planning/Waste_Storage_Requirements.pdf).

**58:** Westminster City Council should set-up water bottle refill stations in key locations in Soho such as St Anne's Churchyard, Soho Square Gardens, Golden Square Gardens, Ramillies Street/Place and encourage TfL to do so at tube stations. WCC should actively promote adoption and usage of the free water Refill scheme.

**Timescale:** Medium

**Reasoning:** see <https://www.refill.org.uk/refill-scheme/london/> Single use plastic water bottles are resource intensive and wasteful and the need for water on the go should be increasingly supplied by water refill stations.

**59:** Westminster City Council should work with takeaway coffee shops to encourage them to provide discounts for using reusable cups and encourage them to fund dedicated coffee cup recycling bins situated inside their premises. It should as a matter of priority extend the coffee cup recycling scheme trialled in Victoria and recently deployed in the Heart of London Business Alliance area to Soho.

**Timescale:** Immediate

**Reasoning:** see <https://cleanstreets.westminster.gov.uk/good-to-go-coffee-cup-recycling-scheme-launched-in-westminster/>

**60:** Westminster City Council and Veolia should establish a food waste 'preferred provider' collection service and market it to Soho's commercial food and drink related premises. This should use suitably adapted vehicles to reduce spillages and where possible be powered by electric vehicles or hybrid vehicles to reduce polluting emissions.

**Reasoning:** By default this should be the Westminster/Veolia service <https://cleanstreets.westminster.gov.uk/food-waste-recycling-london/> Timescale: Immediate to Medium

**61:** Westminster City Council licensing policy and landlord lease provisions should be amended to play a constructive part in achieving take-up of the food waste collection service, and to encourage shared food waste facilities.

**Timescale:** Medium

**Reasoning:** All property owners should do more to reduce food waste which is both a substantial waste problem and also a potential resource if collected properly and re-used in composting and anaerobic digestion systems.

**62:** Where there is surplus food that is capable of safe consumption retailers should be encouraged by WCC to work with suitable charities to minimise wasted food.

**Timescale:** Immediate

**Reasoning:** To minimise food waste in an area where there is a concentration of food and beverage related business. WCC should actively promote adoption by businesses of food waste usage schemes such as Too Good to Go or Olio - see <https://toogoodtogo.co.uk/> and <https://olioex.com/>

**63:** The Ramillies Place/Street area should be improved urgently by a partnership between WCC, TfL, NWECC and the Photographers Gallery.

Timescale: Immediate

**Reasoning:** To give effect to the city council's Oxford Street District Strategy and improve the public realm in environmental and public leisure terms.