

Soho
Neighbourhood
Forum

Consultation Report
February 2020

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1. Executive Summary

This Consultation Feedback Report has been prepared in alignment with the Neighbourhood Planning Regulations 2012, it includes:

- a. Details of the persons and bodies who were consulted about the proposed neighbourhood plan
- b. How they were consulted
- c. Summaries of the main issues and concerns raised by the person consulted
- d. Description of how these issues and concerns have been considered and, when relevant, addressed in the proposed Neighbourhood Development Plan.

The consultation targeted those who live, work and visit Soho as well as Westminster City Council, statutory consultees and community and amenity groups. The aim was to ensure that as many people as possible had the opportunity to review the draft Soho Neighbourhood Plan and/or the Executive Summary and were able to comment on the draft Soho Neighbourhood Plan to inform the document.

The consultation period was launched on Wednesday 17 July 2019 and ran until Wednesday 11 September 2019. Documents were presented on the Soho Neighbourhood Forum website, www.planforsoho.org, with the aim of promoting the draft Soho Neighbourhood Plan and ensuring easy navigation to the necessary documentation to review and leave feedback. The website allowed users to sign-up to the Forum, as well as review the draft Soho Neighbourhood Plan, the Executive Summary and complete the 15-minute questionnaire.

The questionnaire, which covered all key sections in the draft Soho Neighbourhood Plan, was made available to the local community online and in hard copies at community events, which were held during the consultation period and at permanent locations including:

- St Anne's Parish Office, 55 Dean Street, W1D 6AF
- Marshall Street Leisure Centre, 15 Marshall Street, W1F 7EL
- House of St Barnabas, 1 Greek Street, W1D 4NX
- Comm Comm UK, 3rd Floor Office, 1 Burchier Street, W1D 4HX.

Each location had numerous copies of the Executive Summary and a copy of the draft Soho Neighbourhood Plan for community members to read and review. Hard copies of the survey were provided, along with pens and a ballot box for community members to complete the questionnaire and leave in the ballot box for collection by members of the team. All materials were on display for the community to review throughout the consultation period.

Flyers were delivered to homes and business within Soho, advertising upcoming consultation events. These were also left at the permanent locations. Social media was also used to advertise the consultation and keep the local community updated.

Soho Neighbourhood Forum volunteers were on-hand at community events during the consultation period. The draft Plan, exhibition boards and a banner as well as other supporting materials were displayed at these events across Soho. Steering Group members were also available to speak to members of the community. The stalls and volunteers were available at lunchtime events from 12:00pm to 2:00pm in the following locations:

- Soho Square, Wednesday 7 August 2019

- Berwick Street market, Friday 16 August 2019
- Rupert Street market, Wednesday, 21 August 2019
- Golden Square, Wednesday 28 August 2019
- Soho Square, Wednesday 4 September 2019.

All comments received, verbal and written, were used to inform the Soho Neighbourhood Plan before submission to Westminster City Council.

In addition to these lunchtime events, two public evening events were held for the community to discuss the draft Plan.

- Summer Drinks Consultation, My Place, 21 Berwick Street, 5:00pm to 7:00pm on Wednesday 21 August 2019
- Q&A, St Anne's Church, 55 Dean Street, 6:00pm to 8:00pm on Thursday 29 August 2019.

A third event was held to engage with local businesses within Soho.

- Business Breakfast at House of St Barnabas, 8.30am to 10am on Tuesday 3 August 2019.

The questionnaire was completed by 195 respondents. The feedback was varied and was overly supportive of the Plan.

The Forum also received responses from the following statutory consultees: Westminster City Council (WCC), the Greater London Authority (GLA), Transport for London (TfL), the Environment Agency (EA) and Historic England (HE).

Major stakeholder responses came from Nimax Theatres Ltd, Monmouth Planning, Clean Air London, Shaftesbury plc and the London Cycling Campaign and a letter from an individual resident.

The consultation led to a number of changes to the layout of the plan, reducing the number of policies and changes to wording. Justification to prevent large floor plates was substantially expanded and steps were taken to ensure the Soho Neighbourhood Plan did not duplicate Westminster City Council policies. Changes were also made to the affordable housing provision and housing space standards policies.

The consultation programme undertaken by the Soho Neighbourhood Forum has been successful in raising awareness with the local community about the draft Soho Neighbourhood Plan and the process moving forward. It was also successful in gaining the opinion and valuable feedback of the local community.

Through consultation, there have been many practical as well as strategic suggestions regarding the draft Plan from respondents. The Steering Group and Planning Group will be reviewing suggestions, comments and queries in full and will ensure that they are addressed as necessary.

2. Introduction

The Soho Neighbourhood Forum was established in 2014 to develop a Neighbourhood Plan for Soho in accordance with the Localism Act 2011. The Soho Neighbourhood Forum is empowered by the Localism Act of 2011 to create neighbourhood planning policies that govern how development will come forward in the neighbourhood. The Forum's constitution was established with the approval of Westminster City Council in 2014.

The Forum is made up of those who live or work within the area defined as the Soho Neighbourhood Area (SNA) who have applied to become members of the Forum. Membership is free but is only open to those who can show that they live or work in the SNA. At the inaugural meeting in July 2015, the members elected a Forum Steering Group (FSG) of 16 members to guide and represent the forum. It is made up of eight representatives of residents and eight representatives of businesses. The Forum Steering Group is elected each year at the AGM. It is a voluntary association operating under a constitution approved by Westminster City Council (WCC) who designated the neighbourhood area and the Forum itself. The Forum was designated a business neighbourhood forum which means that we must consult businesses as well as residents and get the consent of both groups to the final plan when put to referendum.

The draft Soho Neighbourhood Plan is a planning policy document for the next 21 years. Its function is to articulate policies with which future development in Soho should comply in order to be granted planning permission.

The draft Soho Neighbourhood Plan is built on ideas and comments received through a number of consultation rounds over the past four years, which has resulted in an overall vision, objectives and policy initiatives. These previous consultation rounds are documented in the Soho Survey 2016 and 2017 Results on the Plan for Soho website.

The draft Plan contains both planning policies as well as supporting text and justifications. The Plan also details current issues in Soho, such as housing, traffic congestion, infrastructure, public spaces, recycling, waste and food waste collection.

The draft Plan is split up into five key sections, which look at different objectives for the area. These are:

- Culture and Heritage
- Commercial Activity
- Entertainment and the Night-Time Economy
- Housing
- Environment.

The Soho Neighbourhood Forum has undertaken a programme of community consultation before the formal submission of the Plan to Westminster City Council. The aim of the consultation was to get as much feedback as possible on the draft Plan and ensure that as many people as possible understood and had the opportunity to comment.

3. Why Consult

Comm Comm UK was instructed by the Soho Neighbourhood Forum to assist with the consultation process for the draft Soho Neighbourhood Plan.

Comm Comm UK is a specialist strategic communications agency working within the built environment with expertise and experience of advising on and implementing consultation and communication programmes.

Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. Neighbourhood planning provides a powerful set of tools for local people to ensure that the right objectives are used for their community and align strategic needs and priorities for the wider local area.

Consultation is a key pillar of the Localism Act 2011, which enshrines neighbourhood plans. The heart of all neighbourhood planning is the community and it is at its very core that the local individuals and organisations collect ideas and draw together policy initiatives.

There are other guidance and best practice documents that set out the importance of consultation and offer advice on the best way to undertake meaningful community engagement. These include the Killian Pretty Review 2008 and HM Government's Code of Practice Consultation 2008.

4. Consultation Programme and Events

The consultation programme for the draft Soho Neighbourhood Plan began on Wednesday 17 July 2019 but was first formally introduced at the Soho Summer Fete on Sunday 30 June 2019. The consultation programme ran for a nine-week period, until Wednesday 11 September 2019, with the aim to gain as much feedback as possible.

Below details the programme of events and activities over the period:

Date	Event/Consultation Activity
Sunday 30 June 2019	Soho Summer Fete
Wednesday 17 July 2019	Article published on Soho Neighbourhood Forum's website and members emailed about the consultation
Wednesday 7 August 2019	Lunchtime market stall in Soho Square
Friday 16 August 2019	Lunchtime market stall in Berwick Street
Wednesday 21 August 2019	Lunchtime market stall in Rupert Street
Wednesday 21 August 2019	Evening summer Drinks Consultation at My Place, 21 Berwick Street
Wednesday 28 August 2019	Lunchtime market in Golden Square
Thursday 29 August 2019	Evening Q&A at St Anne's Church, 55 Dean Street
Thursday 3 September 2019	Business Breakfast at House of St Barnabas, 1 Greek Street
Wednesday 4 September 2019	Lunchtime market in Soho Square

At the events noted in the table, individuals who have been involved in the development of the draft Plan have been on-hand to receive both verbal and written feedback on the draft Plan. Materials, including exhibition boards, the draft Plan, Executive Summary and questionnaire forms have also been available.

5. Overview of Methodology

This section details the engagement undertaken by the Soho Neighbourhood Forum members, volunteers and Comm Comm UK over the nine-week period. It outlines how the Forum engaged with the local community and stakeholders in the local area.

The consultation programme began with the publication of an article, detailing the launch of the consultation on the Soho Neighbourhood Forum's website, www.planforsoho.org. An introductory email was then circulated to all members of the Soho Neighbourhood Forum, outlining and introducing the process, the latest version of the draft Plan and methods for contributing with feedback.

A contact email, telephone number and website details were given for the community to get in touch if they require the documents in other formats such as large format or in translations. A dynamic social media campaign also kept interested neighbours informed of upcoming events.

The overall strategic aims for consultation were to:

- Promote and publicise the draft Plan through effective traditional and online tools to ensure that as many local people are engaged as possible
- Gain feedback through online and traditional methods on the draft Plan
- Engage as many commercial and residential individuals to sign-up to the Forum database
- Ensure the local community understood what the Soho Neighbourhood Plan is and what it plans to focus on and achieve in the future.

The target audiences for engagement were:

- Soho Neighbourhood Forum current members
- Residents, businesses, workers and visitors in the Soho area.

The Soho Neighbourhood Forum has a number of affiliated organisations that were actively encouraged to share the draft Soho Neighbourhood Plan and details of the consultation programme through their own communication channels. This included:

- City of London (Department of Planning and Transportation)
- Clinical Commissioning Groups
- Crossrail
- EE
- Environment Agency (London Office)
- ESP Electricity Limited
- Historic England
- Homes and Communities Agency
- London Borough of Camden
- London Enterprise Partnership
- Mayor of London
- National Grid DPM Consultants
- Natural England
- NHS Property Services
- Transport for London
- Thames Water Utilities Ltd
- Vodafone and O2.

Westminster City Council also sent the Forum a list of organisations it thought should be consulted. This list included the following official statutory consultees:

- The Mayor of London (GLA)
- Local Planning Authorities: Westminster City Council and London Borough of Camden
- Natural England

- The Environment Agency
- Historic England
- Transport for London (TfL)
- The Coal Authority
- Highways England
- The Homes and Communities Agency
- Network Rail
- National Grid
- UK Power Networks
- The Marine Management Organisation
- Central London Clinical Commissioning Group
- Thames Water
- BT Openreach.

5.1 Consultation Materials

Copies of all materials issued as part of the consultation process can be found in the Appendices.

The draft Soho Neighbourhood Plan, Executive Summary and Exhibition Boards

The draft Soho Neighbourhood Plan and Executive Summary were branded A4 documents (Appendix A), which were available to the local community to review throughout the duration of the period at four locations: St Anne's Parish Office, Marshall Street Leisure Centre, House of St Barnabas and Comm Comm UK's office.

The documents were also present at community events held throughout the consultation period. The documents were emailed to statutory consultees, community groups and members of the Soho Neighbourhood Forum, as well as being available to download online from the Forum's website. A freephone telephone number and email address were made available to the local community to allow them to get in touch if they required the documents in a different format or if they had any queries.

Exhibition boards were produced and on display at events across the consultation period, see Appendix B. The boards detailed the consultation, gave key information regarding how to get involved and explained the different sections of the draft Plan.

Website

The first Soho Neighbourhood Forum website was first created in the autumn of 2014 and a communications plan was put together to engage with local residents. The website has been active since, with the establishment of the Soho Neighbourhood Forum taking place in July 2015.

The website, www.planforsoho.org, provides updates on various matters such as news regarding upcoming events and local government planning policy.

The design of the website allows visitors to provide feedback, submit queries and get in contact with members of the team for more information. Copies of minutes from Annual General Meetings and Forum Steering Group meetings are available to view, along with the draft Soho Neighbourhood Plan and the Executive Summary.

Articles were published on the website indicating when the consultation period began and ended (Appendix C). These were highlighted at the top of the website to ensure visitors easy access to the relevant documents, which were provided.

The first article advertising the consultation period provided links to the Executive Summary and draft Plan, a link to the questionnaire and the locations of where hard copies could be obtained. The second article was published on the last day of the consultation period. The article included links to the Executive Summary and draft Plan, a link to the questionnaire and the locations of where hard copies could be obtained.

Member Emails

Emails were sent out to the Soho Neighbourhood Forum database. Emails were sent at intervals over the consultation process to inform and allow respondents to actively take part in the consultation. Community groups and organisations noted in the Overview of Methodology were asked to share the details on the draft Soho Neighbourhood Plan and consultation with their own members and databases, reaching a large and vast array of individuals and groups. Copies of emails sent by the Forum's administrator can be found in Appendix D.

Adverts and Flyers

Prior to the consultation period, an advert was published in the Soho Clarion. The advert noted that members of the Soho Neighbourhood Forum would be present at the Soho Summer Fete to discuss the draft Plan and to answer any queries. The advertisement was also formatted into double-sided A4 flyers. Between Monday 3 June 2019 to Friday 7 June 2019, 4,800 flyers were hand delivered to residential and business addresses within Soho and 200 flyers were sent by post to Forum members. The flyers provided a short summary of the draft Plan and provided contact and social media details for the public to get in touch with members of the team. Copies of both flyers and the distribution area can be found in Appendix E.

Between Thursday 8 August and Friday 16 August, a further 2,000 flyers were distributed to residents and the public at events held by the Forum. The flyers provided the dates of the market stall and public events. These also included a scannable QR code, which would take the individual to the online questionnaire via their mobile phone. The flyers also included contact information and the Forum's social media details.

Soho Radio

The consultation was also mentioned and discussed on Soho Radio a number of times prior and during the consultation period. The consultation was publicised on six occasions between 23 May 2019 and 29 July 2019.

Social Media Campaign

Social media was utilised throughout the consultation to communicate with a range of different audiences. Twitter, Instagram and Facebook were the most effective tools used in the campaign. A copy of each post can be found in Appendix F.

Twitter posts gained impressions of up to 25,371 users while Facebook posts reached 320 users. Instagram also engaged social media users in the consultation and posts gained up to 37 likes. A number of conversations around the Plan took place on Twitter and were considered by the team.

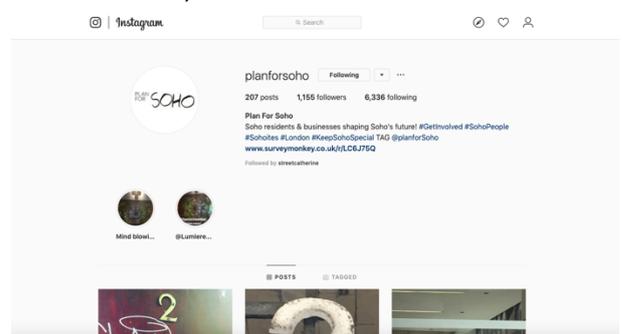
Twitter – @planforsoho
Followers – 3,421



Facebook – @planforsoho
Followers – 168



Instagram – @planforsoho
Followers – 1,155



Press

The Soho Clarion published an advertisement in its Summer 2019 issue (No.173), featuring information about the annual Soho Summer Fete. The advertisement detailed the date, time and location members of the Soho Neighbourhood Forum would be on hand to discuss the draft Plan. It also advertised the next Annual General Meeting.

The Clarion is delivered to homes, hotels, private members’ clubs, offices, shops, restaurants and bars in Soho and has a readership of approximately 3,500.



Photo of flyer enclosed in Soho Clarion next to advert

Questionnaire

A digital online and hard copy of the questionnaire were created to gain feedback from the local community about the policies set out in the draft Plan. Hard copies of the questionnaire were available alongside the Executive Summary and the Plan, available upon request, at St Anne's Church, Marshall Street Leisure Centre, House of St Barnabas and Comm Comm UK. A banner with a QR code was also placed at Marshall Street Leisure Centre so members of the public could scan the QR code if they would like to complete the questionnaire via their mobile phones.

5.2 Events

Summer Drinks Consultation at My Place, 21 Berwick Street

Wednesday 21 August 2019 5:00pm to 7:00pm

The Soho Neighbourhood Forum and team were on-hand with exhibition boards and consultation materials to actively engage with attendees. Hard copies of the questionnaire were given out to attendees and those who wished to take the survey online were provided with the flyers with the questionnaire QR code.

Q&A St Anne's Church, 55 Dean Street

Thursday 29 August 2019 6:00pm to 8:00pm

The Soho Neighbourhood Forum and team were present to answer questions from the public regarding the draft Plan. The panel included Soho Neighbourhood Forum Members Matthew Bennett, Jessica Stewart and Jace Tyrell. Questions raised by attendees included concerns over waste collection, how the policy would prevent large developments from coming into Soho and the number of private members' clubs.

Business Breakfast at House of St Barnabas, 1 Greek Street

Tuesday 3 September 2019 8.30am to 10am.

House of St Barnabas hosted a Business Breakfast and invited a number of local Soho businesses. The main areas of discussion centred around how the Plan can support businesses, especially Small to Medium Enterprises (SME), while ensuring the other policies are respected. Many felt that some buildings are in need of improvement as they have not seen any investment for years. Others felt that Soho has a critical mass of SMEs in cultural, communications and artistic industries and it is important to keep rents low to maintain this and encourage start-ups and entrepreneurs. However, it is also essential to provide the right infrastructure, such as good fibre and internet services, and for local premises to have flexibility.

6. Overview of Feedback

From Wednesday 17 July 2019 to Wednesday 11 September 2019, the Soho Neighbourhood Forum had a total of 195 respondents who participated in the questionnaire.

- 182 were completed online
- 13 hard copies were received

There were also 40 click engagements by individuals who viewed the survey and exited before completing, bringing the total number of engagements to 235.

The survey consisted of 51 questions in total, this included:

- 10 administrative questions (i.e. Name, address, gender)
- 5 policy overview questions
- 35 questions to cover each individual policy in the draft Plan
- The questionnaire also asked 'Do you support the draft Plan coming into force?'

Please find the responses to the Questionnaire as well as Statutory Consultees' feedback in this section of the report.

6.1 Questionnaire: Administrative Questions

The administrative questions asked for personal data, so that respondents could be kept informed on the consultation and news on how their feedback has been taken on-board.

The questions also gathered demographic data to better understand the audience and whether they live, work or visit Soho as well as what industry they work in.

The results found that:

- 64% of respondents identified as Male, 32% as Female and 4% as Other or Preferred to not say
- Most responses (26%) were received by those in the 35-44 age range
- The majority of those who participated in the survey worked or visited Soho. Respondents were able to select multiple options out of 'live' 'work' and 'visit' Soho
- Most respondents who lived or worked in Soho had been in the area for up to five years. 32% of responses were received by those who had either lived or worked in the area for over 20 years
- Few respondents were from outside of Greater London, 87% of responses were received by those visiting from Greater London or the South East
- There was a highly diverse range in professional sectors amongst respondents. Property and Film and Television were popular sectors with seven respondents working in each of these sectors.

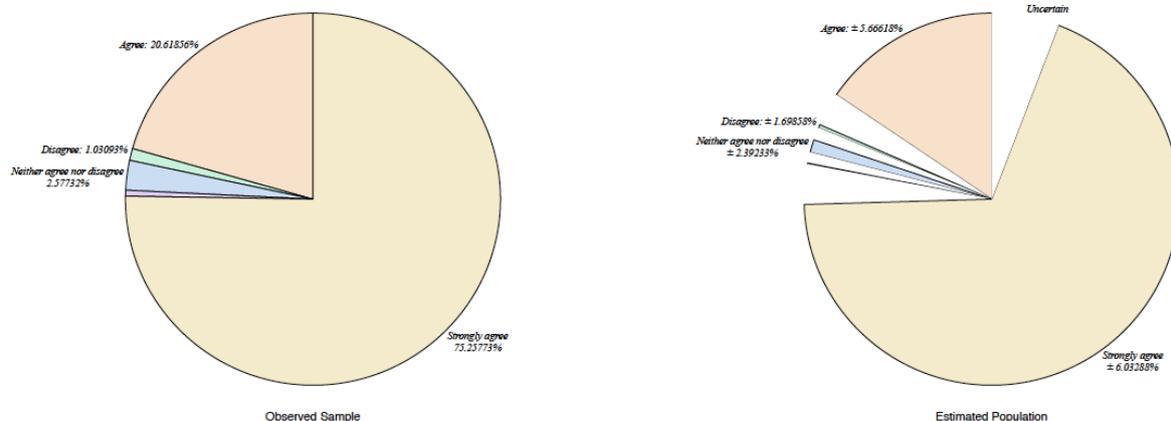
6.2 Questionnaire: Overview and Individual Policy Questions

The policy overview questions asked respondents if they strongly agree, agree, neither agree nor disagree, disagree or strongly disagree with the policy overview. The results can be found in this report. Respondents were offered the opportunity to comment on each individual policy or to skip to the end of the survey. 46 respondents chose to comment on each individual policy.

Each question offered the opportunity for respondents to insert further comments. The comments below from respondents have been restructured to provide clarity and grammatical errors have been fixed for readability. The comments selected do not share the overall view of every respondent but were selected due to the comments being constructive and representative of feedback on each question.

6.2.1 Culture and Heritage

Q10. Proposals for tall buildings will not be supported. Development proposals must respect the predominant size and scale of the conservation area with any proposals for significantly taller buildings direct to the north, east and south boundary roads of Oxford Street, Charing Cross Road and Shaftesbury Avenue. Proposals must respect 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.



- Tall buildings should only be permitted on the perimeter and existing streetscapes should be respected. Scale is a key component of maintaining the character of Soho
- I agree with this but do not agree with the inclusion of Shaftesbury Avenue or the middle section of Charing Cross Road
- The charm of Soho streetscapes, which are an essential part of the special Soho character, lie in the variety of individual buildings and the relatively small scale of the buildings.

Policy 1 - Proposals must respect the predominant character of the conservation area in terms of size and scale to be supported. Proposals for major development which involve increases in height over two storeys will only be supported where they have a frontage on one of three key boundary roads of the Soho Neighbourhood Area namely Oxford Street, Charing Cross Road and Shaftesbury Avenue as defined in Map 4 and will have their major scale and massing on those streets stepping down to scale of the streets to the rear.

- There is enough development as it is
- Disagree with the inclusion of the middle section of Charing Cross Road and Shaftesbury Avenue
- Containing higher buildings on Oxford Street
- Developments must avoid overlooking and encroachment.

Policy 2 – Proposals for tall buildings which are substantially taller than their surroundings will not be supported. Proposals which seek to substantially increase the height of existing buildings by more than two storeys for commercial and one storey for residential will not be supported. The protected vistas and views which cross Soho must be strictly respected. Any proposals for substantially taller buildings will only be considered where they front the boundary roads to the area as defined in Policy 21.

- Height needs to be restricted
- Vital height is restricted to keep Soho a vibrant community and leisure area
- Taller buildings should be supported only for social residential developments.

Policy 3 – Development proposals should reflect 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.

- Emphasis should be put on restricting the use of large plate-glass windows in proposed designs
- Dark, overbearing colours should not be allowed.

Policy 4 - Proposals for mixed use developments and refurbishments, which retain a traditional mix of occupiers, (such as retail, light industrial, office, and residential) and fully apply the ‘agent of change’ principle as defined in the London Plan will be supported.

- Policy needs firmer action in law
- Soho must maintain traditional businesses
- Berwick Street Market needs protection from residents, retailers, developers and hotels acting as agents of change.

Policy 5 - Rear yards, courts, back streets and mews all contribute to local character and should be protected and enhanced when part of development.

- Green spaces especially need protection for air quality
- These should not become private spaces sold as new public space. These should remain accessible to all
- Yes, these spaces are important contributors to the area.

Policy 6 - Where development involves creating new street facing facades developers are required to avoid creating bland shop fronts and repetitive facades. Opportunities to add detail and colour which increases interest and character will be supported.

- Emphasis should be put on restricting use of large plate-glass windows in the designs. These do not reflect the architectural heritage and also do not contribute to environmental sustainability
- Should come up with a Soho 'look' that provides strong design guidelines.

Summary of Culture and Heritage Policies

This section looks closely at the collective areas that make up Soho's culture and heritage. The community were in agreement that the character of Soho must be preserved and were supportive of where large-scale development may be permitted.

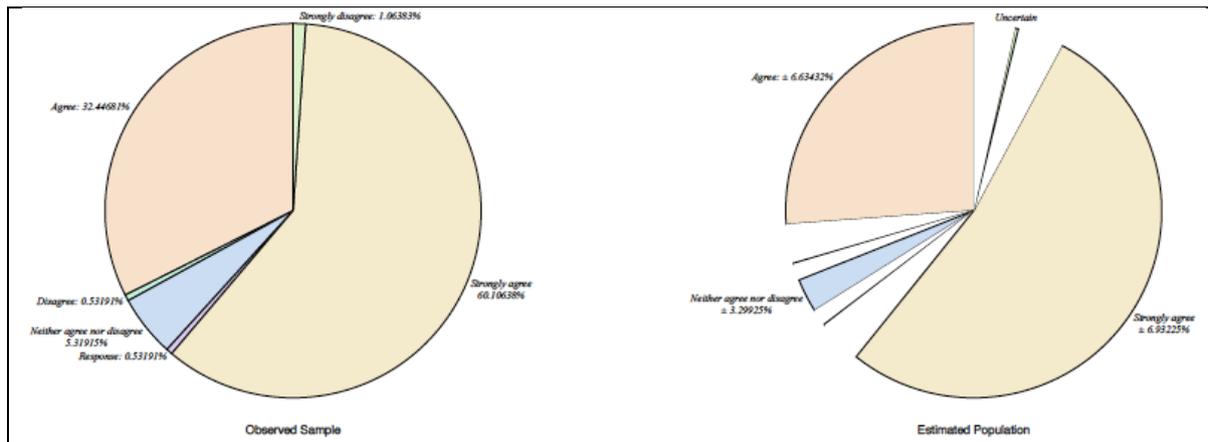
Question 10, which looked to provide an overview of the Culture and Heritage section, received positive feedback from respondents, with 73% stating they 'strongly agreed' with the statement.

Maintaining Soho's unique character and the conservation area is important to residents. Proposed developments, which design did not fit in with the surrounding area, would most likely face a number of objections by residents. In particular, one respondent stated applications that would use plate-glass windows in their designs would not contribute to the architectural heritage of the area.

Just two respondents disagreed with the statement and one respondent noted that tall buildings and densification were needed to ensure rents and prices are not driven up, maintaining and improving its vitality.

6.2.2 Commercial Activity and Creative Industry Policies

Q11. Commercial or mixed-use development proposals must ensure that the availability of smaller commercial premises for office and retail use is not diminished. Other than at the north, east and south boundary streets, large floor plate office developments for single occupiers are not 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. Existing private members clubs will be protected and new proposals normally supported.



- We do not need any more large-scale developments. 20th Century House should be saved
- Small businesses integrate better into the community
- All buildings must not restrict the protected view towards Westminster.

Policy 7 - To be supported commercial or mixed-use development proposals must ensure that the availability of smaller commercial premises for office and retail use is not diminished.

- Smaller businesses should not have to pay ridiculous rates that force them out of business
- Small commercial venues should be given priority There needs to be special provision for small scale (Soho size) coworking to encourage the seeding and rooting of creative business back into Soho. Currently this vacancy can only be achieved by carving up small spaces into dysfunctional minuscule spaces to get below the rates floor. This is an issue unique to central London where rates are so steep that even a tiny business cannot get below the threshold.

Policy 8 - Other than in the areas defined in Figure 4 large floor plate office developments for single occupiers are not regarded as suitable developments to be supported.

- Buildings should not be knocked together to create large footplate either
- A lot of small one-off company that defined Soho's character have gone. We need to bring back one-off shops for the people that live and work here and stop thinking about what is best for the tourists

Policy 9 - Proposals for ground floors should avoid creating wasted an unused space and be well designed to increase the diversity, vibrancy and activity that typifies the conservation area.

- No large empty, soulless foyers
- As long as they carefully consider nearby residential properties and their impact on these.

Policy 10 - Existing galleries and cultural uses will be protected and proposals for new galleries and cultural uses will be supported.

- The Trust welcomes and is supportive of this policy, which is consistent with the NPPF and adopted and proposed policies within the London Plan and Westminster City Plan
- Agree, however many gallery spaces are being used as commercial pop-up shops for brands. This needs to be monitored

Policy 11 - Proposals, which ensure that the lettable space in commercial and mixed-use developments is designed as workspace for the creative industries, with an emphasis on start-ups, will be strongly supported.

- This is what is needed, not offices. Encourage enterprise and skill development
- But can this be enforced somehow? Otherwise this is unlikely isn't it?

Policy 12 - Proposals, which seek to replace existing private members clubs with other uses, will be resisted. Proposals for new private members' clubs which do not provide accommodation overnight for members will normally be supported.

- Strongly agree with first sentence. Support for new private members' clubs needs very careful consideration and should only be considered if they meet a particular need that doesn't already exist
- Do not support new private members' clubs because they are, by definition, exclusive in nature, whereas the spirit of Soho is one of inclusivity.

Summary of Commercial Activity and Creative Industry Policies

This section was well received by respondents, with many stating that small scale commercial activity is an important character trait of Soho. Support for policies to protect existing music venues was highly supported, including policies that would help bring in creative workspaces and new galleries.

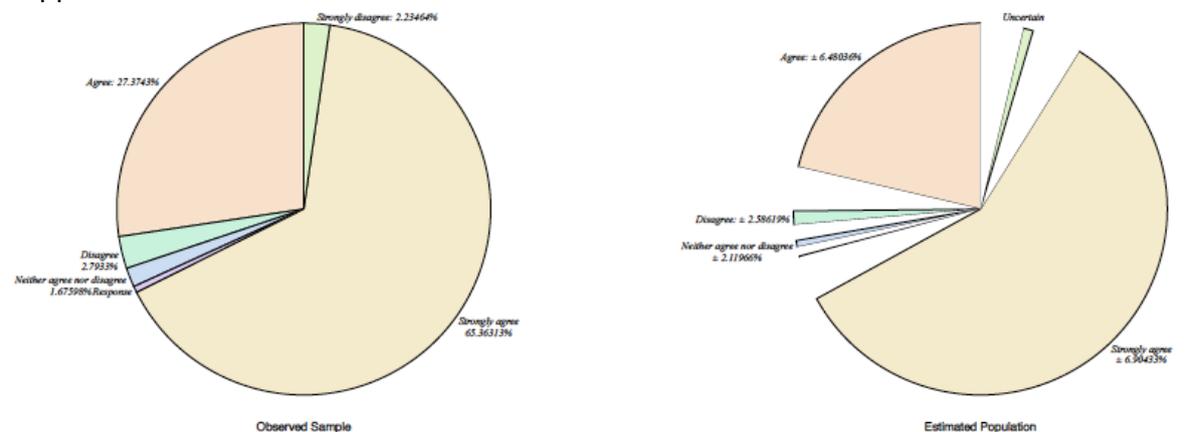
The majority of respondents strongly agreed with the statement made in question 11 but raised concerns in regard to individual policies within this section. Policy 12, the provision for private members clubs within Soho, received the most negative feedback from respondents. Respondents stated Soho has a high number of private member clubs and that Soho is known for its inclusivity.

Respondents were keen on policies that would support commercial and mixed-use developments, specifically for smaller businesses. Comments addressed the need for commercial space to be at affordable rent levels so smaller businesses are maintained in the area.

6.2.3 Entertainment and the Night-Time Economy

Q12. Existing music venues 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 A1 cafes, A3, A4, A5, and D2 uses above or adjacent to 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.



- Disagree with the support of new D2 and large A3 uses in Soho. Agree with large music venues but suggest as with the original proposal that they should be limited in size to 400sqm with corresponding audience capacity
- High rents are an issue.

Policy 13 - Existing music venues will be protected. The development of (D2) live music venues will be supported provided they are low impact in terms of noise and in how the arrival and dispersal of customers is managed.

- Brilliant, cannot wait for this to be completed
- The night-time economy is both to be encouraged but also managed responsibly for the sake of residents.

Policy 14 - To be supported proposals for new A1 cafes, A3, A4, A5 and D2 uses above or adjacent to 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.

- D2 use in residential areas can be tricky, but it is doable
- Absolutely agree, also make it compulsory for cafes, pubs, bars and restaurants and office buildings to have ashtrays that are emptied regularly
- This is crucial but too little thought has gone into how this can be successfully implemented.

Policy 15 - Proposals which provide additional public toilet capacity will be strongly supported.

- Strongly agree. This is an absolute necessity given the high concentration of pubs, bars and restaurants
- Agree but need to be properly maintained

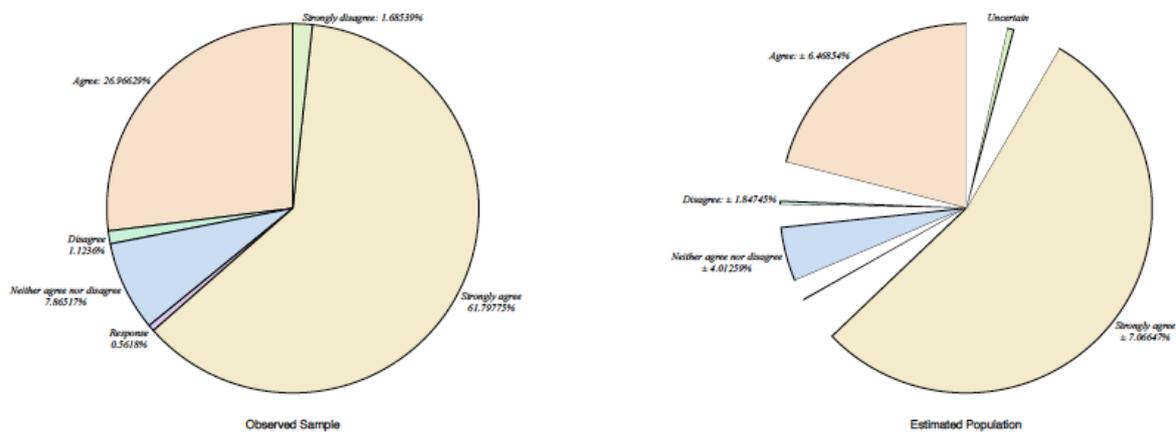
Summary of Entertainment and the Night-Time Economy Policy

The questionnaire showed agreement, in principle, for the majority of the proposals put forward. However, there was caution about the location of proposed venues, noise impacts, the impact of rents on entertainment establishments and the terminology of 'adverse impacts' and the 'agent of change' principle.

Policy 14 received mixed feedback, which was due to the ‘agent of change’ principle and the term ‘adverse impacts’. Respondents stated the proposed policy needed to be more precise on what is considered an adverse impact and how this could be implemented in practice.

6.2.4 Housing

Q13. Affordable housing should be provided as part of new development or if that is not practically possible then within the Soho Neighbourhood Area. On-street parking permits will not be approved for residential development, other than provision for disabled bays. No overly large flats will be supported. Major developments must use 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.



- I broadly agree but think a more flexible view should be taken on on-street parking. I suggest that Soho residents should be able to obtain on-street parking permits that entitle them to park in Zone G and all of the contiguous Westminster resident’s parking zones
- Not sure about on-street parking permits as people need cars for various personal reasons
- “Overly large flats” is perhaps too vague. Affordable three-bedroom flats for families should be part of the mix
- Not clear that ‘affordable’ is a word with any real meaning. Affordable to whom?
- Must be properly enforced. Developers cannot be allowed to wriggle out of their commitments.

Policy 16 - Where to meet Local Plan requirements affordable housing can only be provided ‘in the vicinity’ in this Plan is defined as within the Soho Neighbourhood Area.

- You need social housing, not affordable. Affordable housing is short term and will be converted in the future. Social housing is what is needed
- Yes, very important to maintain divers-income residents in Soho. This is an important part of the areas make-up

- There is not enough affordable housing in Soho
- Existing social housing needs to be improved and more accessible to Soho workers as well as residents.

Policy 17 - Residential development should not only be car free but by legal agreement ensure that occupants of new housing have no right to apply for a residents parking permit (other than those with special needs).

- No cars but for existing residents
- This may discriminate against residents who are self-employed and need a vehicle for their business
- This is very important. Residents parking permits should be abolished outright. There is no need for private cars in Soho whatsoever
- Definitely agree and should get rid of residents parking except for those who are severely disabled.

Policy 18 – Only housing units which do not exceed the highest minimum standard in the Nationally Described Space Standards namely 138 sqm will be supported.

- Yes, Soho needs more studio flats to encourage single residents to live here. Westminster Council should invest in building more houses in Soho
- Agree strongly

Policy 19 - Major development must show in a Construction Management Plan (CMP) that potential adverse impacts on residential amenity during construction have been actively considered and avoided or mitigated and that positive enhancements to amenity have been considered and included where possible.

- Existing residents must be protected from constant redevelopment construction noise and inconvenience
- There should be no further major development if these aspirations are to be applied
- This is usually required and rarely followed by developers.

Policy 20 - Major Development must show in a Delivery and Servicing Plan (DSP) that on completion and once in use the adverse effects on the immediate local environment and public realm have been mitigated or avoided.

- Phrasing should be changed from 'not avoided' to controlled
- No deliveries from 10pm till 8am in quite high residential areas

Summary of Housing Policy

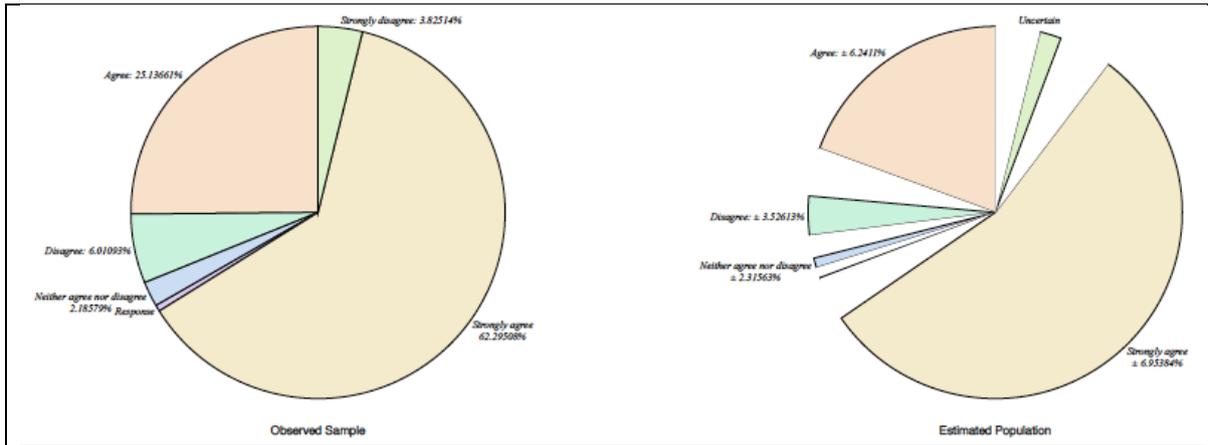
This section looks at the provision of housing in Soho and the residential community. These policies encompass areas such as affordable housing, transport, pollution and on-street

parking. Responses to the policies are largely mixed and comments focus heavily on parking control and affordable housing.

Proposed policies, which look to ensure new developments are car free received a positive response but were also mixed. Respondents raised concerns for future residents who may need to use a car for work or are self-employed and need a vehicle for their business. Other concerns were raised regarding current on-street parking, with respondents feeling unsure if on-street parking should be permitted. Other comments were supportive of pedestrianising the entirety of Soho due to current air pollution concerns.

6.2.5 Environment

Q14. Applicants should maximise measures that contribute to 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. The public car parks at Brewer Street and Poland Street should be safeguarded and temporarily protected from development that changes their use until proposals for their reuse as sites for micro-consolidation can be brought forward. The creation of new green 'pocket parks' on roofs for employees and other 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 level of greening. All development proposals should 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 should display clearly a street number for each premises to facilitate better 'way-finding'. Major developments will be expected, where practical, to provide more cycle stands in the immediate vicinity of the development for use by 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 should additionally provide extra waste and recycling storage capacity or 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 unauthorised access. The provision of retailing of food and drink should store food waste as a separate category and use a food waste recycling services. The Soho Neighbourhood Plan designates two quiet oases at Ramillies Street/Place and Dufours Place. All applicants within the Soho Neighbourhood Area are also encouraged to use every opportunity to provide public seating whenever possible as part of their development.



- I strongly agree with trying to improve waste management and collection through any means necessary, especially technological means
- Wonderful. However, I would like more of Soho to have trees planted, or natural flowers planed in order to encourage bees and also to combat the pollution
- Whereas I strongly agree with the statement, I would like to see ways/plans incorporated to reduce littering and dumping in Soho
- Agree with all but the protection of the car parks at Brewer and Poland Streets. Soho should be discouraging cars, congestion and pollution by providing fewer places to park
- Car parks should be closed with the majority of Soho seeking to become car free with significantly upgraded pedestrian and cycle facilities.

Policy 21 - In their design proposals applicants should maximise measures which contribute to improving air quality by such things as green infrastructure, delivery and servicing plans and methods of on-site renewable energy generation which emit less pollutants and reduce reliance on the use of fossil fuels.

- There ought to be public organic, recyclable and refuse facilities in every development for the benefit of the community
- Businesses should demonstrate that they can operate and be sustainable without using traditional delivery lorries, vans and taxis
- Soho needs to dramatically cut the number of journeys by car.

Policy 22 - In development proposals measures which waste heat and energy and cause carbon emissions should be avoided.

- Not avoided – controlled and halted
- Essential
- It shouldn't be avoided, it should be proportionally taken into account with other issues, including effective use of space and not increasing costs for businesses and residents

Policy 23 - Measures to retrofit and improve the sustainability of existing buildings and reduce their emissions will be strongly supported provided the character and heritage assets of the buildings are carefully considered and respected.

- Agree as long as it is not used as an excuse for major redevelopment
- Care should be taken to protect small distinctive features.

Policy 24 - The public car parks at Brewer Street and Poland Street should be safeguarded and temporarily protected from development which changes their use until proposal for their reuse as sites for micro-consolidation can be brought forward.

- Strongly disagree. Space for cars is wasteful and could be better used for affordable housing
- Agree but not temporarily.

Policy 25 - The creation of new green 'pocket parks' on roofs for employees and others to use will normally be supported provided a robust management plan is in place to mitigate any potential adverse impacts such as noise nuisance.

- Phrasing should be changed from 'normally supported' to 'actively encourages'
- Strongly agree, but need to add 'over-looking' of residential properties
- There is a risk of noise nuisance and could be distressing to residents.

Policy 26 - Development 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.

- Strongly agree, but maintenance is also an issue and needs to be enforced
- It would add character
- Agree and also contribute to adjacent public realm improvements.

Policy 27 - All development proposals should be designed in such a way as to facilitate pedestrian movement. Proposals should seek to:

- Create clear and well signed pedestrian routes
- Provide even surfaces and minimise steps and level changes
- Design out blind spots and recessed doorways
- Provide well-lit and clean temporary passageways during development works
- Reduce vulnerability to flash flooding and ensure that the neighbouring public realm is well drained using sustainable urban drainage (SUDs) wherever possible.

- Provide more cycle lanes
- The entire area should be pedestrianised
- Agree but as part of this, on-street tables and chairs should be restricted

Policy 28 - 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.

- Should allow for public amenity space
- This should be the norm
- It is important to draw attention to the need to protect the integrity of historic layouts of pedestrian and vehicle routes.

Policy 29 – Facades and entrances to premises should display clearly a street number for each premises to facilitate better way finding.

- Sure, but mystery has never hurt the mystic of Soho

- This is always a problem on Dean Street
- Should provide large, well designed and consistent numbers.

Policy 30 – Major developments in addition to their provision internally for employees who cycle will be expected to consider and where practical provide more cycle stands in the immediate vicinity of the development in order to enhance the use of cycles by visitors to the building.

- Agree, however the new London Plan standards are widely inappropriate for Soho
- Soho is too crowded for so many bicycles
- Developers should be required to provide lockers for clothes, change and washing facilities for large developments
- This needs to be more enforced rather than just where practical.

Policy 31 – Development which includes provision of, or revisions to, waste and servicing facilities must provide separate waste and recycling facilities within the boundary of the development. New facilities must have easy access for contractors to collect the materials.

- This will not happen unless it is made legally or contractually binding
- Reduce noise and frequency of collections and deliveries and reduce waste piles on streets.

Policy 32 – Development that is designed for letting to a number of separate commercial occupiers should provide with the overall proposal a single facility for waste and recycling for use by all occupiers of the development.

- Generally agree unless it is a listed building or there is a protected ground floor unit
- Depends on how much it would increase the cost for the business

Policy 33 - Major commercial developments should provide adequate waste and recycling storage facility to meet the requirements of the development. In addition, there is a requirement to provide extra waste and recycling storage capacity (within the development) for designated neighbouring small commercial units within a 100 metre radius (provided it is within the boundaries of the SNA).

- Agree but not to the detriment of residents using the same building – i.e. noise, obstruction and nuisance
- Yes. I agree with the proposal to lower the number of companies providing waste delivery in order to amalgamate present quantity

Policy 34 – Development which includes the provision or retailing of food and drink should 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.

- I would like to see glass crusher encouraged by the policy
- If it does not increase costs for small businesses
- Vital to reduce street bag nuisance.

Policy 35 – The plan designates 2 quiet oases at Ramillies Street/ Place and Dufour’s Place. All applicants within the SNA are also encouraged to use every opportunity to provide public seating whenever possible as part of their development.

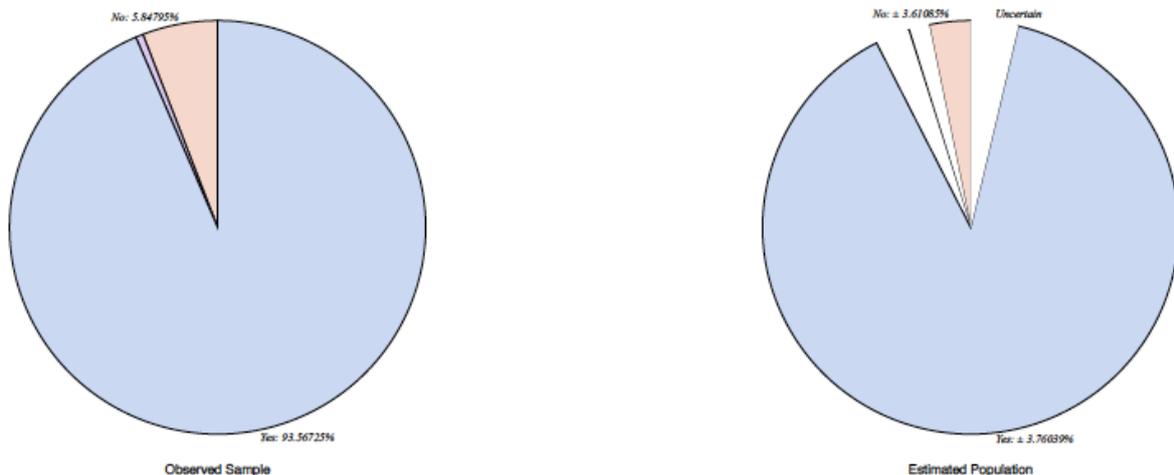
- Fully agree, however, wish Marshall Street would be included
- Soho needs more than what is recommended in this policy
- Not encouraged but required. Controls should be put in place to prevent misuse of alcohol.

Summary of Environment Policy

On-street parking continued to be a main discussion point with a number of respondents stating for Soho should be pedestrianised. Policy 24 received the most negative feedback, as respondents were unsupportive of preserving the car parks and believed the space to be better suited for more housing or alternative uses.

Proposed policies, which looked to improve air quality and prevent further pollution in Soho were widely supported. It is clear with Soho’s central location that respondents want to ensure Soho continues to expand in sustainable alternatives and improve quality of life within the area. Green infrastructure policies were highly supported, with Policy 26 receiving overwhelming support. Respondents stated that greening would add character to Soho and that greening should be one of Soho’s distinctive features.

6.3 Questionnaire: Do you support the draft Plan coming into force?



Respondents were asked if they were supportive of the Plan coming into force. 94% selected ‘Yes’ and only 6% selected ‘No’ showing great support for the plan.

6.4 Statutory Consultees and Additional Stakeholder Response

The Forum received responses from the following statutory consultees: Westminster City Council (WCC), the Greater London Authority (GLA), Transport for London (TfL), the Environment Agency (EA) and Historic England (HE).

Major stakeholder responses came from Nimax Theatres Ltd, Monmouth Planning, Clean Air London, Shaftesbury plc and the London Cycling Campaign and a letter from an individual resident.

WCC made many detailed points about layout and textual suggestions which were very helpful. They and HE suggested separating policies 1 and 2 more clearly and suggested ways to reword many of the other policies. They also felt that some policies duplicated those in the new draft Local Plan 2019 -2040 and therefore some policies were either dropped or refocused. WCC were particularly concerned about the Forum's policy on making new residential development not only car free but free of the right to obtain a resident's parking permit but this policy was strongly supported by TfL so has been reworded but kept. The GLA supported the policy on small housing units and wanted to encourage the Forum to identify and allocate sites for housing to support the Westminster target 1495 but the Forum does not believe it has the knowledge to accurately assess and designate sites in such a complex mixed use area. It also contrasts with GLA support for more office, culture, arts, entertainment, night-time economy, LGBT+ and tourism uses. The GLA were also keen for the plan to identify suitable sites for tall buildings but notes that opportunities will be limited due to most of the area being a conservation area and the three protected viewing corridors. It also offered strong support for earmarking the two local car parks for micro consolidation.

TfL made some detailed textual improvements and supported the policies on walking and cycling were strongly supported and was keen to see their Healthy Streets approach incorporated into the plan which has been done. They were also 'greatly supportive' of the proposed car parking permit ban and the proposals for the two car parks. The EA were only specifically concerned to identify areas of flood risk which only lightly touch the Soho Neighbourhood Area.

HE welcomed the plan and the consideration it gives to the local and historic character of Soho but were very concerned about policies 2 and 8 as drafted which envisaged some possible tall buildings on sites located on the major boundary streets and felt that there was no evidence underpinning this approach and that in their view they would cause significant harm. Following an exchange of emails and a meeting both policies have been revised in a way acceptable to HE which will generally resist tall buildings but allow some infill development.

The major stakeholder responses from Nimax Theatres Ltd were keen to include more mention of theatres within policies and to safeguard the importance of deliveries to get in and get out stage sets and other equipment as shows change.

Monmouth Planning suggested constructive changes to better describe the contribution of the evening and night-time economy but did not recognise that noise and anti-social behaviour is often a side effect of late night uses even if they are well run within the premises.

Clean Air London repeated to us evidence given to the London Plan Enquiry to ensure that development is at least air quality neutral.

Shaftesbury Plc were concerned about any aspects of policies which inhibited their ability to provide more office and residential development. They supported the proposals on retrofitting but felt that policies for major development should do more to encourage innovative design and that there should be greater clarity about the policy on enhancing rear yards and mews. They felt that the 'agent of change' principle should more clearly be used to protect existing arts, culture and entertainment uses. They did not support the policy that major development should over provide waste and recycling facilities in order to reduce rubbish dumped on the street.

The London Cycling Campaign were supportive of the policies on movement and micro consolidation but felt more should be done to prevent through traffic. The resident felt that there should be more mention of improvements to Lighting, Carriageways and Footways in the Plan.

All feedback from statutory consultees can be found in Appendix G.

7. How the Statutory and Community Consultation has Informed the Plan

The comments received by WCC led to a number of radical changes to the layout of the plan. These included moving much of the detail about the process of establishing the forum and the public consultation phases into the Consultation Statement. It also involved reducing the number of policies from 35 to 31 and placing the policy before the reasoned justification that underpins it. It also involved adding further references to supporting evidence and improvements to the Glossary. Comments from WCC, HE and a range of survey respondents led the forum to redraft and refocus policies 1 and 2 and to consolidate policy 5 into a revised policy 1. Any reference to allowing major development on the major boundary roads of Oxford St, Charing Cross Road and Shaftesbury Avenue were omitted but wording included to allow infill development across the plan area.

The policy to prevent large floor plate offices had its reasoned justification substantially expanded and based on local evidence. In the Creative Industries steps were taken to avoid duplication with WCC's draft Local Plan and greater emphasis on the need to reflect in public art Soho's culture and heritage and to use local creative businesses. The policy on Private members clubs was altered to make clear that those to be protected should be those who have a proven track record of providing opportunities and facilities for networking and that should those owning such clubs wish to change the use they would need to carry out an active marketing campaign of the existing use for 12 months before any change might be agreed to. The policy also restated that new clubs may be supported where they comply with the relevant parts of policy 17 of WCC's draft Local Plan.

The policy on affordable housing was amended to ensure that off-site housing provision is made in the vicinity where that is feasible and practicable. The policy on housing space standards was completely reworded and the reasoned justification for it largely rewritten.

The policy on Delivery Consolidation Points was reworded to require that any development proposals for the car parks consider and evaluate their potential for such use rather than proposing a 5 year ban on any change of use. Finally, all the policies on Waste and Recycling have been combined into one policy and the reasoned justification for them clarified and expanded.

8. Conclusion

The consultation programme undertaken by the Soho Neighbourhood Forum has been successful in raising awareness with the local community about the draft Soho Neighbourhood Plan and the process moving forward. It was also successful in gaining the opinion and valuable feedback of the local community and reaching out to those who may not normally engage in planning matters as well as those who do.

Through consultation, there have been many practical as well as strategic suggestions regarding the draft Plan from respondents. The Steering Group and Planning Group will be reviewing suggestions, comments and queries in full and will ensure that they are addressed as necessary.

The results from the feedback questionnaire were positive and in general the majority of policies were well-received. The most diverse views from the questionnaire, excluding the policy overview questions, came from Policy 12, Policy 17, Policy 24 and Policy 25.

Question 10 received the most positive feedback, with 75% of respondents stating they 'strongly agree' with the policies. Question 14 received the most negative feedback, with 4% stating they 'strongly disagree' with the proposed policies.

Individually, Policy 5 received the most positive feedback. Residents were keen on developments to incorporate open spaces within new developments and believed the Policy would have a positive impact on the area.

Policy 12 received the most negative feedback, with many of the respondents stating there is the high volume of private members clubs within Soho and would not support the introduction of more private members clubs.

Those who live, work and visit Soho generally understand and are in agreement regarding the principle need for growth in this central location. However, this must remain balanced and flexible to ensure that the character and scale of Soho is not jeopardised.

The Soho Neighbourhood Forum will continue to liaise and update the local community as it seeks to update the Plan and move through the neighbourhood planning process.

Appendices

Appendix A – Executive Summary and Draft Plan

Executive Summary

Soho Neighbourhood Forum
Summer 2019
Executive Summary

This plan is a neighbourhood plan using the powers created by the Localism Act 2011 to give people living and working in an area such as Soho the right to draw up their own plans. The Soho Neighbourhood Area (SNA) was decided upon in May 2013 and the Soho Neighbourhood Forum was designated on 25th July 2014 as a business neighbourhood forum, which is led by a Forum Steering Group (FSG) of 50/50 residents and businesses.

The FSG quickly agreed a vision for the Forum to work towards. Soho is a very diverse and intensively used area with many competing interests. It was decided that the best way to proceed was 'bottom up'. In other words, to consult first to identify what people felt the key issues to be. Then devise some very simple objectives (which we called 'aspirations') to address those key issues. Check back with those consulted plus a range of key stakeholders whether those aspirations were widely supported and gauge the level of support for each. Then proceed with detailed policy work built on that foundation of community views. That is what we have done.

Some of the ideas that came forward in the process were just not matters that can be covered in a neighbourhood plan, so we have produced a non-statutory (i.e. not legally binding) set of recommendations and projects to put forward to bodies like Westminster City Council and Transport for London, which we ask them to carefully consider to help achieve the overall vision for Soho.

What Did The Public Consultation Reveal?

Our initial working parties established that there were 17 key issues. Our first survey in 2016 received 993 responses to these issues showing us that these issues were of widespread concern. We then crafted 19 aspirations suggesting how we would address these key issues. And carried out a follow up survey in 2017. We asked those responding to indicate their level of support for each on a scale of 1 to 10. We received 542 responses and over 3,000 individual comments. The most strongly supported aspiration was to protect the heritage and culture of Soho. This was closely followed by a desire to control the size and scale of development, followed in turn by a desire to protect and enhance Soho's creative industries and to improve air quality. The lowest level of support was for our aspiration to improve facilities for cyclists.

This extensive early public consultation has produced other positive results. One early 'flagship' policy proposal was to declare Soho a special policy area (SPA), an idea seized on and supported by a wide range of people. We were very pleasantly surprised to see that Westminster in its Draft City Plan 2019-40, formally published on 19th June 2019, has taken that idea and fleshed it out in a strong set of policies to help keep Soho special. Similarly, our proposal on making development more 'neighbourly', protecting galleries and the arts, greening, protecting social and community uses, making residential development car-free and securing improved digital infrastructure have all been reflected in the City Plan. The Forum is grateful that the Council has been in listening mode, both to us and others. It means a bit less content in our plan now but welcome new strong policies in theirs.

Soho Neighbourhood Forum
Summer 2019
Executive Summary

Soho Neighbourhood Forum
Summer 2019
Executive Summary

4. Housing

Affordable housing to be provided as part of new development or, if that is not practically possible, then within the Soho Neighbourhood Area. On-street parking permits will not be approved for residential development, other than provision for the disabled. No overly large flats supported. Major developments must use Construction Management Plans (CMP) and Delivery Service Plans (DSP) to show that they have avoided or mitigated adverse impacts and positively enhanced amenity and the environment.

5. Environment

Applicants should also maximise measures that contribute to 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. The public car parks at Brewer Street and Poland Street should be safeguarded and temporarily protected from development that changes their use until proposals for their reuse as sites for micro-consolidation can be brought forward. The creation of new green 'pocket parks' on roofs for employees and others 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 level of greening.

All development proposals should 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 should display clearly a street number for each premises to facilitate better wayfinding. Major developments will be expected where practical to provide more cycle stands in the immediate vicinity of the development for use by 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 by dumped rubbish bags. Major Commercial developments to additionally provide extra waste and recycling storage capacity for neighbouring small commercial units within a 100 metre radius, provided strictly controlled by suitable technology to weigh and record waste materials, levy appropriate fees and prevent unauthorised access. The provision or retailing of food and drink should store food waste as a separate category and use a food waste recycling service.

The plan designates two quiet zones at Ramilles Street/Place and Dufour's Place. All applicants within the Soho Neighbourhood Area are also encouraged to use every opportunity to provide public seating whenever possible as part of their development.

Soho Neighbourhood Forum
Summer 2019
Executive Summary

What Does The Plan Contain?

There are a series of policies supported by a reasoned justification, which either quotes or gives a reference to the evidence that supports the policy. There are 5 sections. Culture and Heritage, Commercial Activity, Entertainment and the Night Time Economy, Housing and Environment.

Summary of Policies

1. Culture and Heritage

Tall buildings will not be supported. Development proposals must respect the predominant size and scale of the conservation area with any proposals for significantly taller buildings directed to the north, east and south boundary roads of Oxford Street, Charing Cross Road and Shaftesbury Avenue. Proposals must respect 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, 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. Other than at the north, east and south boundary streets large floor plate office developments for single occupiers are not regarded as suitable developments to be supported. Ground floors should avoid creating wasted or 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. Existing private members' clubs will be protected and new proposals normally supported.

3. Entertainment and the Night Time Economy

Existing music venues 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. To be supported proposals for new A1, A3, A4, A5 and D2 uses above or adjacent to residential use must apply the 'agent of change' principle and demonstrate that they will not have adverse impacts on residential amenity that cannot be mitigated. Proposals that provide additional public toilet capacity will be strongly supported.

Soho Neighbourhood Forum
Summer 2019
Executive Summary

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Summer 2019
Executive Summary

2. WHAT DOES THE PLAN CONTAIN?

2.1 The Plan contains five key sections that outline a series of policies, gives reasoned justification and quotes or gives evidence to support the policy. The five key sections include:

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

SUMMARY OF POLICIES

Culture and Heritage

2.2 Proposals for tall buildings will not be supported. Development proposals must respect the predominant size and scale of the conservation area with any proposals for significantly taller buildings directed to the north, east and south boundary roads of Oxford Street, Charing Cross Road and Shaftesbury Avenue. Proposals must respect 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.

Commercial Activity

2.3 Commercial or mixed-use development proposals must ensure that the availability of smaller commercial premises for office and retail use is not diminished. Other than at the north, east and south boundary streets, large floor plate office developments for single occupiers are not 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. Existing private members clubs will be protected and new proposals normally supported.

Entertainment and the Night Time Economy

2.4 Existing music venues 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 A1, A3, A4, A5 and D2 uses above or adjacent to 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.

5

3. INTRODUCTION

3.1 This is the first Neighbourhood Plan for Soho. It is a first and real opportunity for residents, workers and visitors to begin to shape their own area. The Soho Neighbourhood Area (SNA) was designated by Westminster City Council (WCC) on 17 May 2013. The designated area is shown by the red line on the map below (Figure 1).



Figure 1 Map of Soho Neighbourhood Area designated area

7

Housing

2.5 Affordable housing should be provided as part of new development or if that is not practically possible then within the Soho Neighbourhood Area. On-street parking permits will not be approved for residential development, other than provision for disabled bays. No overly large flats will be supported. Major developments must use 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.

Environment

2.6 Applicants should maximise measures that contribute to 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. The public car parks at Brewer Street and Poland Street should be safeguarded and temporarily protected from development that changes their use until proposals for their reuse as sites for micro-consolidation can be brought forward. The creation of new green 'pocket parks' on roofs for employees and others 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 level of greening.

2.7 All development proposals should 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 should display clearly a street number for each premises to facilitate better 'way-finding'. Major developments will be expected, where practical, to provide more cycle stands in the immediate vicinity of the development for use by visitors to the building.

2.8 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 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 unauthorised access. The provision or retailing of food and drink should store food waste as a separate category and use a food waste recycling service.

2.9 The Soho Neighbour Plan designates two quiet oases at Ramillies Street/ Place and Dufours Place. All applicants within the Soho Neighbourhood Area are also encouraged to use every opportunity to provide public seating whenever possible as part of their development.

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3.2 The Soho Neighbourhood Forum was designated as a Business Neighbourhood Forum for a five-year term by Westminster City Council on 25 July 2014, to give Soho the opportunity to draw up its own plan for the area. The Soho Neighbourhood Forum has applied for renewal for a further five-year term from 26 July 2019.

3.3 The Soho Neighbourhood Forum has prepared the Soho Neighbourhood Plan based on the views of local people. These views are succinctly described a vision of what Soho is and what it can be in the future. This Plan sets out how that vision can be achieved through planning policies and controlling land use and development up to 2040. This end date has been chosen as it marks the end of the draft Westminster City Plan 2019-2040. The Plan is being 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 2015 (as amended).

3.4 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 Plan. The Soho Neighbourhood Plan has been prepared to be in general conformity with the NPPF and these 'higher' planning documents.

3.5 The current London Plan was adopted in 2016. However, a new draft London Plan has been published by the Mayor and is going through its examination in public. The Westminster City Development Plan (Local Plan) was also adopted in 2016. In addition, a number of policies in the Westminster Unitary Development Plan (UDP) 2007 have been 'saved' and form part of the development plan. On 19 June 2019, Westminster City Council published for formal consultation the draft of a new Local Plan 2019-2040, which unifies the existing local plan and the saved UDP policies and updates and introduces a range of policies.

HOW TO READ THE PLAN

3.6 The Soho Neighbourhood Plan starts by setting out the Soho Neighbourhood Forum's vision for Soho. It sets out the individual aspirations and objectives for the Plan as derived from public consultation, including the percentage levels of the support expressed for each. It goes on to briefly describe Soho as it is today and then the aspirations and objectives the Soho Neighbourhood Forum seeks to achieve are addressed in a range of policies grouped into five distinct sections. They are **Culture and Heritage**; **Commercial Activity**; **Entertainment and Night-Time Economy**; **Housing and Environment**. These planning policies together seek to achieve our vision.

3.7 Each section sets out in supporting text the reasoning and justification for the planning policies. The reasoning 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.

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Policies are numbered and presented in blue, like this.

It is these policies against which planning applications will be assessed once the Plan 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.

- 3.8 Once the Plan comes into force, these are the policies that applicants must have regard to in preparing their planning applications. Within the Soho Neighbourhood Area, the Plan, once approved, will form part of the local plan for Westminster City Council (The City Plan 2019-2040) and planning decisions will be determined using both documents.
- 3.9 In addition to the Plan's policies there is a 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 policies and help realise the vision for Soho. In particular, they respond to and give voice to the issues raised during the public engagement process.
- 3.10 Good and effective public engagement brings forward a wide range of views about an 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 Plan, if those views and ideas once raised were simply ignored and not put forward.
- 3.11 These recommendations are important and we urge the bodies to whom they are addressed to consider and adopt them.
- 3.12 This is followed by the Evidence Base, which contains or provides links to all the surveys, reports, references and appendices used to create the Evidence Base for policies of the Plan.
- 3.13 It also lists the range of documents read and consulted as background in preparing the Plan even if specific references were not used. In addition, the Evidence Base includes the details of a number of separate documents where these are not easily available online.

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5. OBJECTIVES AND ASPIRATIONS FOR THE PLAN

- 5.1 The aspirations respond to the key issues raised by the initial working parties after the inauguration of the Soho Neighbourhood Forum. They were later endorsed in the 2016 summer key issues survey as well as included in 2017 summer stakeholder survey consultation, which tested if they were widely supported across the local community. Each one is immediately followed by the average percentage level of support it received from respondents. The responses from the three constituent groups of consultees varied a little to make up these average percentages. These differing levels of support can be consulted on our website in the 'full survey results' post on 9 August 2017. External stakeholders and professional experts from areas neighbouring Soho were also consulted and engaged with in 2017 Autumn in a series of 'salons'.
- 5.2 The following aspirations are the principal objectives for the Plan and are based on the various rounds of stakeholder engagement referred to above.

Survey Aspiration	Description	Support
Heritage and Culture	To preserve, enhance, develop and promote the heritage and culture of Soho so that the area evolves in an organic way, and thrives by retaining the underlying 'spirit of Soho,' which gives it such a distinctive character.	88%
Creative Industries	To support the creative industry cluster in Soho to retain and grow this existing nationally and internationally significant creative hub, possibly through designating a Special Policy Area and thus support employment growth.	84%
Size and Scale	To support investment in Soho which respects the nature of the conservation area, generally retaining its character and human scale, channelling large-scale development to the boundaries of the area.	85%
Business, including Small Businesses	To support and enhance the range and diversity of businesses in Soho in particular by strengthening nationally and locally important industry clusters and by ensuring that there is a continuing supply of flexibly sized office accommodation for all types of business including both existing and new SMEs.	82%
Entertainment Venues	To support the development of a number of suitably located live music venues of an appropriate scale for the area.	83%
The Evening and Night-Time Economy	To support growth whilst encouraging good management of all forms of all forms of entertainment, leisure and cultural activity, enabling them to play an increasing part in Soho's economy. This will be achieved by mitigating or minimising any adverse impacts on other users in the area and in particular on residential neighbours.	77%

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4. OUR VISION FOR SOHO

- 4.1 The vision, which was adopted by the Forum Steering Group, has been used to guide the approach to making the Soho Neighbourhood Plan.
- 4.2 The Soho Neighbourhood Area is and will continue to be a unique and important part of London with a rich and vibrant heritage. This Plan will enable 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 Plan will protect this diverse mix and also enable growth, which sustainably enhances what is already a complexly developed area.

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Housing	To grow Soho's residential community in line with commercial growth, in particular, by ensuring that a larger proportion of funds generated from development in the area for affordable housing is actually spent in Soho.	79%
Housing	To support development that provides an appropriate mix of units and tenures to respond to defined local housing need and to promote genuine and effective use of residential accommodation.	83%
Housing	To enhance the attractiveness of Soho for residents, businesses, workers and visitors by reducing the high levels of daytime disruption by development.	76%
Housing	To enhance the attractiveness of Soho for residents by reducing unnecessary night-time noise.	76%
Housing	To enhance the attractiveness of Soho for residents, businesses, workers and visitors by reducing crime and antisocial behaviour.	76%
Air-Quality	To significantly improve air quality across Soho.	83%
Traffic Congestion	To reduce congestion and vehicle volumes by 30% over the life of the Plan while enhancing the growing need of all occupiers for efficient deliveries and collections.	78%
Green Infrastructure	To support greening opportunities both at ground level and above, with a target that 80% of the roofs of unlisted buildings should have greening elements applied to them by the end of the Plan.	82%
Pedestrians	To ease movement for pedestrians.	81%
Cyclists	To improve facilities for cyclists.	63%
Recycling	To ensure that all waste facilities provided as part of developments are designed, built and resourced to enable the maximum amount of waste to be dealt with by recycling.	84%
Waste, including Food Waste	To improve the local environment by reducing the impact of waste in particular by eradicating the need to pile rubbish bags on the street for collection over the life of the Plan and by supporting dedicated food waste collectors and other similar facilities.	81%
Public Spaces	To increase the number of pleasant and quiet public places for workers, visitors and residents to sit and relax within Soho by designating at least five new spaces over the life of the Plan.	77%

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6. THE NEIGHBOURHOOD AREA – SOHO TODAY

THE STRATEGIC AND PLANNING CONTEXT

6.1 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 current Westminster City Plan 2016 and the draft Westminster City Plan 2019-2040 designates the central part of Westminster as the Core CAZ because of the intensity of use and range of activities that take place within it. These plans encourage mixed-use within this core area. In order to protect and encourage certain uses the Council has designated in its City Plan 2019-2040 five Special Policy Areas, including the Soho Special Policy Area. Part of Soho is also designated as a part of the Tottenham Court Road Opportunity Area, which includes parts of London Borough of Camden. The Westminster City 2016 Plan notes that because of its position within historic areas, development will respect the prevailing building heights of the surrounding area.¹ Soho also lies within the Council's West End Special Retail and Leisure Policy Area, which aims to protect, enhance and promote retail and leisure with better transport and pedestrian linkages.²

A BRIEF HISTORY OF SOHO

6.2 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..."³

6.3 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 Special Policy Guidance and still applies.⁴ Paragraphs 4.1 and 4.3 of the audit states:

6.4 "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

¹ <https://www.westminster.gov.uk/sites/default/files/westminster-city-development-plan-2016-tottenham-court-road-opportunity-area-page-46-para-3-23>

² <https://www.westminster.gov.uk/sites/default/files/westminster-city-development-plan-2019-2040-page-13-policy-57>

³ <https://www.westminster.gov.uk/sites/default/files/westminster-city-development-plan-2016-tottenham-court-road-opportunity-area-page-46-para-3-23>

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LIVING IN SOHO

6.10 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 ward profile 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.

6.11 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

6.12 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 architecture adds 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 250,000 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 area its character.

6.13 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 continues after midnight to become a late-night economy, which has more problematic elements for residents and some neighbours with an increasing emphasis on the consumption of alcohol and drug taking.

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residential population. The important residential element to Soho's character prevents it from appearing entirely commercial."

6.5 "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

6.6 According to the 2018 West End Ward Profile⁵ 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.

6.7 Most of those in the approximately 75,000 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' and 70's, is now a thriving, diverse area for fashion, eating and leisure.

6.8 Food, beverage and hospitality are world renowned parts of Soho. The area's restaurants, bars, music venues, members clubs and also the markets on Rupert St and Berwick Street, create an attractive offer to 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 Soho Neighbourhood Area.

6.9 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 rents with many business leases having 'upward only' rent review clauses have made this more challenging to sustain for some businesses when the market flattens or dips. However, the 2018 West End Ward referred to above is the most economically active ward in Westminster and the ward profile 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.

⁴ <https://www.westminster.gov.uk/sites/default/files/westminster-city-development-plan-2016-tottenham-court-road-opportunity-area-page-46-para-3-23>

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ACCESSIBILITY AND ENVIRONMENT IN SOHO

6.14 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 separate Regent Street Conservation 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 London⁶. The arrival of the Elizabeth line and Crossrail 2 will enhance accessibility with new stations at Bond Street to the west and Tottenham Court Road in the north east of the Soho Neighbourhood Area 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 conservation area can undermine the area's character. There are also well-documented deficits in play space, green space and nature deficiency⁷ and the London Heat Map indicates that wasted heat and carbon emissions are high⁸.

⁵ See: <https://www.london.gov.uk/sites/default/files/air-quality-for-public-health-professionals-city-of-westminster.pdf>

⁶ <https://www.westminster.gov.uk/sites/default/files/westminster-city-development-plan-2019-2040-page-133-and-136>

⁷ <https://www.london.gov.uk/what-we-do/energy-and-climate/energy/london-heat-map/new-london-heat-map>

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7. THE PLAN POLICIES

SECTION 1 CULTURE AND HERITAGE



7.1 CULTURE AND HERITAGE

Reasoning

7.1.1 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 conservation areas 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 Soho¹⁷. There are 226 heritage assets and listed buildings within the Soho Neighbourhood Area¹⁸. 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. This heritage is displayed in part through the built fabric of Soho and '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



Figure 2 Map of Soho Conservation Area

¹⁷ Survey of London Volume 33, General Introduction, Page 1
¹⁸ <https://www.paulich-heritage.org.uk/soho-blue-plaques/>
¹⁹ AECOM Soho Heritage and Character Assessment August 2018, Page 17

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the culture, heritage and architectural character. They direct any larger scale developments to be located on or close to the north east and southern boundaries of the area. The western boundary that is based on smaller streets was agreed to as Regent Street the 'natural' boundary lies within its own conservation area covering both east and west sides of that street. The boundary roads of Oxford Street, Charing Cross Road and Shaftesbury Avenue already contain a number of developments of a scale and massing, which is larger than within the core of the conservation area and therefore large-scale development can sit more comfortably in these locations. They also provide a transition zone or buffer to the smaller more intimate scale of central Soho and in such locations do not risk undermining the overall character of the conservation area itself.¹⁷

7.1.5 Policy 3 requires redevelopment and substantial refurbishment proposals to respect the pre-existing plot widths and relate to the 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.

7.1.6 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 achieves a particularly high level of employment.¹⁸ 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.

7.1.7 Facades in recent decades have tended to become bland 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 might 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 facades 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.¹⁹

7.1.8 Policy 4 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 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

¹⁷ AECOM Soho Heritage and Character Assessment section TCA01 on page 23-30 and TCA06 page 66 and Public Soho Public Realm Study page 10
¹⁸ https://www.westminster.gov.uk/sites/default/files/2018/11/19_016_west_west_west_west_report_embedded.pdf
¹⁹ AECOM Soho Heritage and Character Assessment Page 74

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maintained and repaired wherever possible²¹. This existing culture and heritage makes the area an attractive one for employers to attract and retain staff.²²

7.1.2 The Soho Neighbourhood Area is also largely covered by the Soho Conservation Area (Figure 2). The 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"²³ 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".²⁴



Figure 3 Protected views across Soho

7.1.3 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.²⁵ 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 City Council plans indicate two protected views that cross Soho that development must adhere to and protect (Figure 3).

7.1.4 The draft City Plan 2019-2040 contains a welcome Soho Special Policy Area (SSPA) setting out the development it feels to be appropriate here.²⁶ Policies 1 and 2 of this Plan seek to support the City Plan's approach by generally preventing tall buildings as these would erode

²¹ Ibid, Page 74
²² BOP Consulting 2013 Soho the world's creative hub
²³ AECOM Soho Heritage and Character Assessment August 2018, Page 18
²⁴ Public Soho Public Realm Study 2014, Page 9
²⁵ SNF Soho Survey 2016 pages 26 and 38 and Aspirations for Soho report 2107 page 7
²⁶ https://www.westminster.gov.uk/sites/default/files/2018/11/19_016_west_west_west_west_report_embedded.pdf Pages 93-95

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and spirit/brand, which "has a unique role to play within the wider west End"²⁷. 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 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.

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

- A diverse range of independently branded restaurants
- Specialist food retailing
- 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
- Galleries and other cultural uses
- Communications, PR and marketing
- Shops that provide services for residents and enhance residential amenity.

7.1.10 Besides the well-known and sometimes famous streets, Soho contains a wide range of back-streets, 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 facades poorly maintained. Policy 5 requires that potential areas of opportunity, the small back-streets, rear yards, 'cul-de-sacs' and mews are places that can be enhanced as part of development and should properly considered²¹.

7.1.11 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 shop fronts should be avoided and Policy six requires an emphasis on 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".²² 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.

²⁷ Draft City Plan 2019-2040, Page 93, Para 21.1
²¹ AECOM Soho Heritage and Character Assessment August 2018, Pages 39,40,49,50,72 and 74 and Public Soho Public Realm Study 2014 page 50
²² AECOM Soho Heritage and Character Assessment, Pages 39,49,50, 65, 74 and 75

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POLICIES

1: Proposals must respect the predominant character of the conservation area in terms of size and scale to be supported. Proposals for major development which involve increases in height over two storeys will only be supported where they have a frontage on one of three key boundary roads of the Soho Neighbourhood Area namely Oxford Street, Charing Cross Road and Shaftesbury Avenue as defined in Map 4 and will have their major scale and massing on those streets stepping down to the scale of the streets to the rear.

2: Proposals for tall buildings which are substantially taller than their surroundings will not be supported. Proposals which seek to substantially increase the height of existing buildings by more than two storeys for commercial and one storey for residential will not be supported. The protected vistas and views which cross Soho must be strictly respected. Any proposals for substantially taller buildings will only be considered where they front the boundary roads to the area as defined in Policy 1.

3: Development proposals should reflect 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.

4: Proposals for mixed use developments and refurbishments, which retain a traditional mix of occupiers, (such as retail, light industrial, office, and residential) and fully apply the 'agent of change' principle as defined in the London Plan will be supported.

5: Rear yards, courts, back streets and mews all contribute to local character and should be protected and enhanced when part of development.

6: Where development involves creating new street-facing facades developers are required to avoid creating bland shop fronts and repetitive facades. Opportunities to add detail and colour which increases interest and character will be supported.

maintain or enhance the townscape²³ 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.²⁴



Figure 4 Map showing where large scale development may be permitted

- 7.2.5 In Policy 7, the provision of office space in a wide variety of sizes can help to support business and business clusters by providing opportunities to relocate and re-size within the 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 staff²⁵. As Neil Hatton, CEO of 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. 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".²⁶
- 7.2.6 In general, development activity tends to look for the highest commercial viability, minimised costs and strong tenant covenant. This normally 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. Policy 8 makes clear large floorplate developments will only be supported on the boundaries of the area. The existence of smaller commercial and retail spaces rather than large floorplates and units by their nature allow for a greater variety and mix of occupiers within the space provided and has proved no barrier to achieving high-levels of employment.
- 7.2.7 Policy 9 requires development proposals to avoid wasted or underused space. The AECOM Soho Heritage and Character Assessment notes "the loss of active frontages with removal

²³ AECOM Soho Heritage and Character Assessment August 2018, page 74

²⁴ *ibid*, Managing Change section, page 74

²⁵ https://www.aecom.com/~/media/Files/Case-Studies/2018/08/20180820_Soho_Heritage_Assessment_Report.pdf Page 10, and BOP Consulting, Soho the world's creative hub, 2014

²⁶ File note of discussion 18.4.18 between M Bennett and Neil Hatton see Evidence Base

SECTION 2 COMMERCIAL ACTIVITY



7.2 COMMERCIAL ACTIVITY

Reasoning

- 7.2.1 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, which include specialist and independent retail, such as, fabric, music retail and vinyl stores, distinguish it from many other London villages.
- 7.2.2 Despite its commercial success and high density of employment, early public consultation on the Plan 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.²⁷ The Plan wishes to retain commercial and creative activity in Soho and enhance Soho as a location and hub for these activities. The Plan ensures that growth is carried out within the framework of the current size and scale of the area and which builds on existing character, heritage and culture. The Soho Neighbourhood Area is also in large part also a declared conservation area.
- 7.2.3 While the area is a popular location for all employers, development responding to this by creating a large number of large floor plate 'corporate' style accommodation risks undermining the very character that makes the area attractive. This mixture of sizes and diversity has played a large part in the creative processes, which thrive in Soho and has created a higher density of employment levels than anywhere elsewhere in the West End (1,350 jobs per hectare).²⁸ Rather than providing a barrier to achieving growth small and varied size office accommodation has helped it to thrive.
- 7.2.4 New development and extensions to existing properties within the Soho Neighbourhood Area must respect that fact and be designed sympathetically to 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

²⁷ Soho Survey 2016 pages 7 and 38 and Aspirations for Soho 2017 summary of average strength of agreement
²⁸ https://www.london.gov.uk/sites/default/files/20151120_gh_wor_wage_equip_final_report_released.pdf Page 29

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".²⁹ 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.³⁰

POLICIES

7: To be supported commercial or mixed-use development proposals must ensure that the availability of smaller commercial premises for office and retail use is not diminished.

8: Other than in the areas defined in Figure 4 large floor plate office developments for single occupiers are not regarded as suitable developments to be supported.

9: Proposals for ground floors should avoid creating wasted an unused space and be well designed to increase the diversity, vibrancy and activity that typifies the conservation area.

²⁹ AECOM Soho Heritage and Character Assessment pages 7,30,39,45,49,65 and 73
³⁰ Publica Soho Public Realm Study 2014 page 9

7.3 CREATIVE INDUSTRIES

Reasoning

7.3.1 Soho is an important location for the creative industries and industry clusters. The short Creative Industries Study by Publica for the Forum³¹ 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.

7.3.2 "Creative industries are the fastest growing sector of the UK economy," Creative Industries Federation Website.³² 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".³³

7.3.3 The draft City Plan 2019-2040 SSFA section B does not include within it, galleries and other cultural uses, which are also an important part of Soho's character and contribute to its economy.³⁴ Section 16B does protect arts and cultural uses in commercial parts of the CAZ and in the West End Strategic Cultural Area but the map on page 84³⁵ excludes a large part of Soho. Galleries provide important opportunities to showcase creative art and culture and stimulate creative ideas and they should be protected and supported throughout Soho as Policy 10 requires.

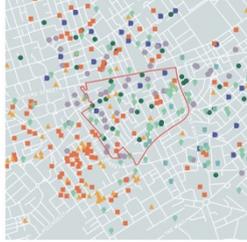


Figure 5 Publica map of creative industries

³¹ Publica Plan for Soho Creative Industries Study June 2018

³² <https://www.creativeindustriesfederation.com/about>

³³ Publica Plan for Soho Creative Industries Study June 2018, Page 3

³⁴ <https://www.creativeindustriesfederation.com/soho-creative-industries-study>

³⁵ [The value of arts and culture to people and society: an evidence review.pdf](#)

³⁶ Draft City Plan 2019-2040, pages 82-84

12: Proposals, which seek to replace existing private members clubs with other uses, will be resisted. Proposals for new private members' clubs which do not provide accommodation overnight for members will normally be supported.

7.3.4 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 created using Soho based creatives.

7.3.5 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."³⁶

7.3.6 It is the aim of Policy 11 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."³⁷

7.3.7 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.

7.3.8 The role that private members' clubs play as networking venues, for creative industries and business clusters, 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"³⁸

7.3.9 Networking is a key function in its own right as well as 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. Policy 12 resists the loss of private member's clubs and encourages further provision.

POLICIES

10: Existing galleries and cultural uses will be protected and proposals for new galleries and cultural uses will be supported.

11: Proposals, which ensure that the lettable space in commercial and mixed-use developments is designed as workspace for the creative industries, with an emphasis on start-ups, will be strongly supported.

³⁷ Publica Plan for Soho Creative Industries Study June 2018, Page 1

³⁸ Ibid

³⁹ Ibid

SECTION 3 ENTERTAINMENT AND NIGHT-TIME ECONOMY



7.4 ENTERTAINMENT VENUES

Reasoning

7.4.1 In the 40 years spanning 1950s-1990s, there was hardly a music scene that did not start in Soho, from the 2's on Old Compton Street onwards.³⁹ Soho is still arguably an entertainment hub although in recent years, grassroots live music has reduced considerably, replaced by restaurants and nightclubs by bars. With live music venues falling due to changed commercial priorities, safety and planning restrictions and increasing rent and rates, much of the activity associated with Soho's night-time economy has moved online or elsewhere. However, public consultation showed within the area "strong cultural associations, particularly for live music venues and entertainment in Soho".⁴⁰

7.4.2 Although there are locations where music performance can and does take place as Figure 5 of the Publica Creative Industry 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 Plan recognises live music as part of Soho's history and heritage and is closely related to the creative industries.⁴¹ It is a crucial part of London's live music culture long term and Policy 13 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.

7.4.3 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.

³⁹ https://en.wikipedia.org/wiki/The_2707s_Coffee_Bar

⁴⁰ AECOM Soho Heritage and Character Assessment Page 6 and Publica Creative Industries study

⁴¹ Publica Creative Industries Study, June 2018 Introduction and Map 4

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 has been designated in the West End, where the number of entertainment uses has reached a level of saturation and harm is being caused⁴².

- 7.4.4 While the Plan is supportive of the growth in entertainment and live music, it is promoted as a primarily evening activity because it is recognized that the late-night economy in general adds a degree of pressure on local services and amenity. It is important that residential concerns 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. This should include having 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 may be acceptable.
- 7.4.5 While wishing to support the provision of live entertainment as an important part of Soho culture and identity, this Plan wishes to prevent as far as possible the harmful effects that continue to be identified by police and Council. Conditions should be offered to be attached to any resulting planning permissions for such entertainment uses 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.
- 7.4.6 In addition, all planning permissions that include the provision of food and drink should have a condition attached to the planning consent that no uncrushed bottle collections shall take place between 23.00-07.00 and other waste collections from 00.00 to 07.00. For deliveries none should be made after 23.00 and before 07.00.

POLICY

13: Existing music venues will be protected. The development of (D2) live music venues will be supported provided they are low impact in terms of noise and in how the arrival and dispersal of customers is managed.

licensed premises offering such facilities have closed. Policy 15 strongly supports development proposals, which include all types of public toilet provision such as pissoirs and pat for use toilets. Proposals providing hospitality, food and drink should in their planning statement consider the need for public toilets which will be a consequence of their proposals and set out the contribution they will make to adequate publicly accessible toilet provision.

POLICIES

14: To be supported proposals for new A1, A3, A4, A5 and D2 uses above or adjacent to 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.

15: Proposals which provide additional public toilet capacity will be strongly supported.

7.5 THE NIGHT-TIME ECONOMY

Reasoning

- 7.5.1 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 economy⁴³. While there is no clear cut-off point when this activity ceases, the nature of the late-night economy gradually changes to one more based on the consumption of alcohol and illegal drugs and as a result 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, ASB and crime, which can accompany it.⁴⁴
- 7.5.2 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.⁴⁵
- 7.5.3 The Soho Neighbourhood Area has been part of a defined stress area in terms of premises licensing policy since 1993.⁴⁶ The defined West End Stress Area 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 goes on to note that they have the highest likelihood of and number of incidents of crime and anti-social behaviour and within Soho's narrow street network there are particular problems with arrival and dispersal at large venues.
- 7.5.4 Policy 14 encourages more diverse entertainment uses, which are designed to be good neighbours to other uses. Applicants should consider in bringing forward their proposals and Planning Statements how adverse impacts can be avoided and mitigated.
- 7.5.5 On the edge of Soho and close to major roads and underground stations it is possible that larger entertainment uses can be safely accommodated and managed.
- 7.5.6 Street fouling is a continual problem in Soho and appears likely to grow as the number of drink related establishments increases. The problem is at its worst late at night when many

⁴² <https://www.london.gov.uk/sites/default/files/document/2016-10-14/westend-stress-area-report.pdf>
⁴³ <https://www.westminster.gov.uk/statements/2016-01-20/wcc-statement-of-licensing-policy-january-2016-para-1.6>
⁴⁴ <https://www.westminster.gov.uk/sites/default/files/2016-01-20/wcc-statement-of-licensing-policy-january-2016-para-1.6> Page 6
⁴⁵ <https://www.westminster.gov.uk/statements/2016-01-20/wcc-statement-of-licensing-policy-january-2016-para-1.6> Appendix 14 Cumulative Impact Policies
⁴⁶ <https://www.westminster.gov.uk/sites/default/files/2007-unitary-development-plan.pdf> WCC Unitary Development Plan 2004 Chapter 8 paragraph 8.64

SECTION 4 HOUSING



7.6 PROVIDING HOUSING

Reasoning

- 7.6.1 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.⁴⁷ 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 the impacts. The new draft City 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.⁴⁸
- 7.6.2 As the draft City Plan states, affordable housing should be an integral part of new development where its size and scale requires it to be provided. Policy 16 seeks to ensure that affordable housing, if it cannot be provided on site is provided within the Soho Neighbourhood Area.
- 7.6.3 Car use has an adverse impact on health.⁴⁹ It is recognised that Soho has amongst the worst air quality in London and vehicular traffic is a major generator of such pollution.⁵⁰ This is of high concern to those consulted in our two public consultation surveys.⁵¹ Traffic arriving at or leaving residential parking would add to this. In addition, it would add to further congest the narrow thoroughfares in Soho, which detracts from the pedestrian experience.⁵²
- 7.6.4 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 the

⁴⁷ Publica Soho Public Realm Study 2014 Pages 132 and 133
⁴⁸ City Plan 2019-2040 pages 31 and 32
⁴⁹ <https://www.london.gov.uk/sites/default/files/2016-01-20/wcc-statement-of-licensing-policy-january-2016-para-1.6>
⁵⁰ <https://www.westminster.gov.uk/sites/default/files/2016-01-20/wcc-statement-of-licensing-policy-january-2016-para-1.6> Appendix 14 Cumulative Impact Policies
⁵¹ Soho Survey debrief 2016 page 7 and Aspirations for Soho summary of average strength of agreement page
⁵² Publica Soho Public Realm Study 2014 Pages 14,15,21,215

SECTION 5 ENVIRONMENT



7.9 AIR QUALITY AND CLIMATE CHANGE

Reasoning

- 7.9.1 Soho and central London generally experience some of the worst levels of air pollution in the City of Westminster⁶⁴. While pollution is in the atmosphere and wind born the Plan supports the Local Plan 2019-2040, which seeks to prevent as far as possible more pollutants being added to the atmosphere from buildings and activities within Soho.
- 7.9.2 The need to control particulate dust as set out in the GIA good practice note speaks for itself. All development proposals during the construction phase must demonstrate how they will comply with the best practice guidance in that GIA and London Councils guidance note "The control of dust and emissions from construction and demolition"⁶⁵.
- 7.9.3 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 specified or designed to emit the lowest practically possible level of pollutants when in use.
- 7.9.4 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 policy 21 sets out.
- 7.9.5 In terms of climate change, 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 activity that use energy and have heating and

⁶⁴ <https://www.bbc.com/news/health-50848484>
⁶⁵ <https://www.london.gov.uk/what-we-do/planning/implementation/london-plan/planning-guidance-and-practice-notes/control-dust-and-emissions>

POLICIES

- 21: In their design proposals applicants should maximise measures which contribute to improving air quality by such things as green infrastructure, delivery and servicing plans and methods of on-site renewable energy generation which emit less pollutants and reduce reliance on the use of fossil fuels.
- 22: In development proposals measures which waste heat and energy and cause carbon emissions should be avoided.
- 23: Measures to retrofit and improve the sustainability of existing buildings and reduce their emissions will be strongly supported provided the character and heritage assets of the buildings are carefully considered and respected.

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'⁶⁶. The GIA Sustainable Design and Construction SPS on page 15 encourages developers to use less energy. Solving these carbon emissions problems is well outside the scope of a neighbourhood plan but its policies can make a contribution as required by Policy 22. Heat that is currently wasted through such things as continually open shop doorways heated by air curtains and only secured by roller shutters or external gas or electric heating to outside seating or smoking areas offer useful 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.

- 7.9.6 Retrofitting⁶⁷ and refurbishment can be a practical and cost-effective way to reduce environmental impacts of development. It should be considered right from the inception of a scheme. It allows development to focus only on the parts of a building that need renovating and upgrading but avoids the amount of disturbance caused by full demolition and the creation of new foundations and structure. Total redevelopment is a less sustainable option wasting the embodied energy and materials of the buildings demolished and using new resources to recreate foundations and structure⁶⁸. Retrofitting existing buildings to improve their sustainability also offers a real opportunity to move towards a low carbon economy. Industry has so far been reluctant to embrace it but for all the reasons set out in this neighbourhood plan it may be a much more sustainable way forward so Policy 23 will strongly support such proposals.
- 7.9.7 Measures to support retrofitting in all development proposals 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
 - Maximising electrical infrastructure so that as it becomes more available renewable energy can be increasingly used.
- 7.9.8 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.

⁶⁶ <https://www.westminster.gov.uk/westminster-city-plan/strategic-policies> Para 5.66 page 155
⁶⁷ <https://www.westminster.gov.uk/westminster-city-plan/strategic-policies>
⁶⁸ <https://www.rics.org/uk/what-we-do/planning/implementation/london-plan/planning-guidance-and-practice-notes/control-dust-and-emissions>

7.10 TRAFFIC CONGESTION AND FREIGHT CONSOLIDATION

Reasoning

- 7.10.1 Traffic congestion is a significant cause of additional carbon and pollutant emissions, delay to business, risk to health and delay to pedestrians. It also erodes and degrades the physical environment within Soho. It was a repeated public concern in the two major consultation exercises in the early stages of establishing aspirations for the plan. Delivery and servicing are a cause of congestion within Soho and contributes to pollution. In order to enable measures to be introduced over the life of the plan to address this there will be a need create measures such as freight consolidation and micro last mile delivery schemes.⁶⁹
- 7.10.2 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 2041⁷⁰. Westminster City Council also seeks to reduce traffic congestion through its Greener City Action Plan⁷¹. Light Van and HGV's make up 17% of London's traffic second only to private cars.⁷² The Mayor's Freight Servicing Action Plan⁷³ seeks in Proposal 17 to support last mile and micro consolidation centres to reduce the intensity of light van use. The new London Plan supports consolidation. Draft 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 policy T7 provides at part E that development proposals for new consolidation and distribution facilities should be supported



Figure 6 Map showing car parks in Soho Neighbourhood Area

⁶⁹ <https://crossriverpartnership.co.uk/news/last-mile-and-freight-and-servicing-strategy/>
⁷⁰ <https://www.london.gov.uk/what-we-do/transport/mayors-transport-strategy-2018.pdf> Page 21
⁷¹ <https://www.westminster.gov.uk/what-we-do/planning/implementation/london-plan/planning-guidance-and-practice-notes/control-dust-and-emissions>
⁷² <http://www.hs-niederrhein.de/transport/westminster-road-traffic-final-dec-2016.pdf> Para 2.1
⁷³ <http://www.westminster.gov.uk/what-we-do/transport/mayors-transport-strategy-2018.pdf>

provided that the enable sustainable last mile movements, including cycle and electric vehicles. The Soho Neighbourhood Area 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 6) are the only structures in the area with road access in which such schemes could be viably created. These two garages should be safeguarded and protected.

- 7.10.3 There is a risk that these two car parks are likely to become more and more under used for their original primary purpose, as drivers continue to respond to the ULEZ and Congestion Charge.
- 7.10.4 Development proposals may come forward to redevelop them or change their use which would eliminate the last viable sites for micro-consolidation to be achieved within Soho. The neighbourhood plan seeks to encourage freight consolidation and requires that these two garages should be safeguarded to stay in their current use for a period of at least five years to enable proposals for micro consolidation to come forward.
- 7.10.5 It should be noted that parcel carrier DPD has submitted a planning application to Westminster City Council for such a distribution centre at the Hyde Park garage on the edge of Mayfair. Planning application 19/03539/FULL.

POLICY

24: The public car parks at Brewer Street and Poland Street should be safeguarded and temporarily protected from development which changes their use until proposal for their reuse as sites for micro-consolidation can be brought forward.

POLICIES

25: The creation of new green 'pocket parks' on roofs for employees and others to use will normally be supported provided a robust management plan is in place to mitigate any potential adverse impacts such as noise nuisance.

26: Development 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.

7.11 GREEN INFRASTRUCTURE

Reasoning

- 7.11.1 Soho is an area of deficiency in terms of nature, open space and play space so improvements to green infrastructure have a particular priority⁷⁴. Providing green infrastructure increases the overall sustainability of new development, helps provide habitats, connecting routes for wildlife between the major parks⁷⁵. 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 area appear more attractive.
- 7.11.2 The Plan and the Soho Green Infrastructure Audit (Green Infrastructure Audit for Soho by LUC Land Use Consultants, 43 Charlton St NW1 1JD), 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. Because utility cables, drains and other services run in complex networks under most pavements there may be only limited opportunities to plant additional trees.
- 7.11.3 A principal opportunity is therefore above ground, often at roof level as recognised by Policy 25. In designing machinery and plant associated with the 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 of it.
- 7.11.4 The greening measures required by Policy 25 will contribute to improving air quality, reducing rainfall run off and increase biodiversity. 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 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 walls⁷⁶.

⁷⁴ https://www.westminster.gov.uk/sites/default/files/soho_green_infra.pdf Page 122

⁷⁵ <http://www.westend.london.gov.uk>

⁷⁶ <https://www.london.gov.uk/what-we-do/what-we-are-doing/urban-green-spaces-and-biodiversity/urban-greening>

7.12 PEDESTRIANS

Reasoning

- 7.12.1 Policy 27 aims to facilitate ease of movement and compatibility between pedestrians, cyclists and vehicles. The Plan expects that pedestrian use of the area will be the priority in line with London Plan and City of Westminster strategies 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. The 2014 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 area's public realm could be improved.
- 7.12.2 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.⁷⁷ Streets lighting in some areas could be improved to improve perceptions of safety. Many pavements are sub-standard in terms of the number of cracked paving and/or rocking paving slabs.
- 7.12.3 As an area identified in part by the local 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.
- 7.12.4 Policy 28 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.
- 7.12.5 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 Policy 29 that such numbers are clearly visible in new developments will help to overcome this.

⁷⁷ Publica Soho Public Realm Study update 2018

POLICIES

27: All development proposals should be designed in such a way as to facilitate pedestrian movement. Proposals should seek to

- Create clear and well signed pedestrian routes
- Provide even surfaces and minimise steps and level changes
 - Design out blind spots and recessed doorways
- Provide well-lit and clean temporary passageways during development works
- Reduce vulnerability to flash flooding and ensure that the neighbouring public realm is well drained using sustainable urban drainage (SUDs) wherever possible.

28: 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.

29: Facades and entrances to premises should display clearly a street number for each premises to facilitate better way finding.

7.13 CYCLING

Reasoning

7.13.1 Cycling is a sustainable and healthy means of transport to and within Soho and provides an alternative to the use of vehicles with carbon and pollutant emissions. There are also significant reductions in the carriageway requirements for cycles over 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 comparing use and safety in major cities shows⁷⁸. Cycling is largely used by employees as a health, quick and environmentally friendly way to commute and existing planning requirements respond to these needs. However, increasingly those visiting commercial premises within the Soho Neighbourhood Area arrive by bicycle and may not be aware of cycling facilities within buildings 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 London Plan policy T5.8⁷⁹

POLICIES

30: Major developments in addition to their provision internally for employees who cycle will be expected to consider and where practical provide more cycle stands in the immediate vicinity of the development in order to enhance the use of cycles by visitors to the building.

⁷⁸ <https://www.researchgate.net/publication/311809722/figure/fig/1/figure-fig1/311809722/transport-european-cities-five-chart/>

⁷⁹ <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/48-ahf-new-london-plan/character-10-transport/ahf-15-cycling>

7.14 WASTE AND RECYCLING

Reasoning

- 7.14.1 Although there is a City of Westminster Municipal Waste Management Strategy 2016 – 2031⁸⁰ its objectives are difficult to achieve in Soho because of congestion and its complex 24/7 activity. One of the principal negative aspects of Soho's intimate street pattern and narrow pavements is that rubbish and dumping disfigures the area.⁸¹ There is very little off street provision which leaves almost no alternative to on street disposal. A range of private contractors provide commercial waste and recycling collection services on a commercial basis. In addition, Veolia currently has the municipal waste collection contract.
- 7.14.2 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. Soho has a well-recognised problem of rubbish being left on pavements and it is important that development does not add to that. Because land and rental prices are high all occupiers have become reluctant to make adequate provision and so the problem can simply be transferred to the public realm. Heavy pedestrian use of the 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.⁸²
- 7.14.3 A key aim over the life of the plan 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 area's on-street environment alongside and as a higher priority than such things as cosmetic improvements to the public realm and/or public art.
- 7.14.4 The Plan aims to achieve this in a number of ways. First by requiring as part of development the provision of adequate space to store waste and recyclables and in locations which facilitate easy collection from the street. This applies to commercial and residential development. Second, providing a single point for waste and recycling within a multi-occupied building will help to minimise vehicle movements related to waste and recycling collections from the building and contribute to reduced congestion and improved air quality.
- 7.14.5 Third, 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".⁸³ Other solutions at varying scales can be achieved by not only providing the correct space and facilities for

⁸⁰ <https://www.westminster.gov.uk/sites/default/files/2016-09/2016-2031-mwms-strategy.pdf>

⁸¹ Publica Soho Public Realm Study update 2018 pages 10 and 11

⁸² <https://www.westminster.gov.uk/sites/default/files/2016-09/2016-2031-mwms-strategy.pdf>

⁸³ City Plan 2019-2040 Page 142 Para 38.3

the waste and recyclables produced by the occupiers of a major development but also by providing additional waste storage space which can be accessed by designated occupiers of neighbouring properties without internal storage facilities. The beneficiaries of this provision should on the advice of Westminster City Highways officers be within an indicative radius of 100 metres to deposit their own waste and recyclables for collection. Such 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.

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

7.14.7 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.⁸⁴

POLICIES

31: Development which includes provision of, or revisions to, waste and servicing facilities must provide separate waste and recycling facilities within the boundary of the development. New facilities must have easy access for contractors to collect the materials.

32: Development that is designed for letting to a number of separate commercial occupiers should provide within the overall proposal a single facility for waste and recycling for use by all occupiers of the development.

33: Major commercial developments should provide adequate waste and recycling storage facility to meet the requirements of the development. In addition, there is a requirement to provide extra waste and recycling storage capacity (within the development) for designated neighbouring small commercial units within a 100 metre radius (provided it is within the boundaries of the SNA).

⁸⁴ Soho Survey 2016 and Aspirations for Soho survey 2017 -Section on Waste including food waste

7.15 FOOD WASTE RECYCLING

Reasoning

7.15.1 Soho has a very 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 area all to a greater or lesser extent providing food¹⁶. 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 area and create unnecessary waste. At a minimum the plan wishes to see all food and hospitality businesses required to provide facilities for food waste recycling and use a food waste recycling service such as that provided by Veolia the current holder of Westminster's municipal waste contract.

POLICIES

34: Development which includes the provision or retailing of food and drink should 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.

¹⁶ As an indication the West End Stress Area which covers Soho and the Westminster part of Covent Garden was recorded in 2016 in Westminster City Council's statement of licensing policy appendix 14 that there were 1,005 licensed premises a higher concentration than anywhere else in the UK.

8. GLOSSARY

Term	Description
Affordable Housing	Types of housing for rent. This may include social rented, affordable rented and intermediate rented housing to eligible households whose needs are not met by rents at market level.
Asset of Community Value	Land or buildings of local importance, nominated by local community groups. When these assets come up for sale or change of ownership it gives local community groups 6 months to raise money to 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.
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 where there is a forum up to 15% (capped at £100 per council tax payer) can be sent on local neighbourhood infrastructure priorities and this rises to 25% uncapped once a neighbourhood plan comes into force.
Conservation Area	An area of notable environmental or historical interest or importance which is protected by law against undesirable changes. 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 may be business uses classified in planning terms as A1, A3, A4, A5 and D2. See glossary entry on 'use class'.
Last Mile Delivery	Ways of delivering goods which seek to minimise the use of fossil fuel delivery vehicles.
Major Development	This is development (including major refurbishment) which in size is above the City plan definition of Major Development (small scale) as defined in the City Plan.

7.16 PUBLIC SPACES

Reasoning

7.16.1 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. 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.



Figure 7 Map showing Ramillies Place and Dufour's Place

7.16.2 Ramillies Place/Street are defined in the OR8 (Oxford Street, Regent Street and Bond Street) Action Plan produced by TfL, Westminster and the NVEC 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 should be implemented. Dufour's Place is a 'cul-de-sac' surrounded by residential uses with quite large areas capable of public realm improvements to increase local space for greening as well as seating/rest and relaxation.

POLICY

35: The plan designates 2 quiet oases at Ramillies Street/ Place and Dufour's Place. All applicants within the SNA are also encouraged to use every opportunity to provide public seating whenever possible as part of their development.

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.
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.
Social and Community Uses	These are as defined in WCC planning consultation booklet No7 February 2014.
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	Are those which are proposed to have a height which is over two additional storeys to that existing.
Tall Buildings	Are those as defined in the WCC City Plan.
The Council	An abbreviated name for Westminster City Council.
Use Class	A set of government regulations that divide business activity into specific categories and which normally require planning permission for change of one use to another.

Appendix B – Presentation Boards

Soho Neighbourhood Forum

The Soho Neighbourhood Plan

The Soho Neighbourhood Plan 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 plans.

The Soho Neighbourhood Area (SNA) was designated by Westminster City Council (WCC) on 17 May 2013.

The Soho Neighbourhood Forum was designated on 25 July 2014 as a business neighbourhood forum, which is led by a Forum Steering Group (FSG) of 50/50 residents and businesses.

Our Vision for Soho

The Soho Neighbourhood Area is and will continue to be a unique and important part of London with a rich and vibrant heritage. This Plan will enable 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 Plan will protect this diverse mix and also enable growth, which sustainably enhances what is already a complexly developed area.



Soho Neighbourhood Forum

The Policies

This is an exciting time in Soho's history. For the first time, the Soho community has come together to develop policies for the future.

The plan seeks to address a range of policies, among these are the following key policies.



1. Culture and Heritage

Development proposals must respect the predominant size and scale of the conservation area with any proposals for significantly taller buildings directed to the north, east and south boundary roads of Oxford Street, Charing Cross Road and Shaftesbury Avenue.



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.



3. Entertainment and Night-Time Economy

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.

Soho Neighbourhood Forum

The Policies



4. Housing

Affordable housing to be provided as part of new development or if that is not practically possible then within the Soho Neighbourhood Area.



5. Environment

Maximise measures that contribute to improving air quality and reduce reliance on the use of fossil fuels. The creation of new green 'pocket parks' on roofs for employees and others 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 level of greening.

Get in touch with the Soho Neighbourhood Forum

planforsoho.org
anna.doyle@planforsoho.com
planforsoho

planforsoho
planforsoho
planforsoho

Soho Neighbourhood Forum

The Policies



4. Housing

Affordable housing to be provided as part of new development or if that is not practically possible then within the Soho Neighbourhood Area.



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Appendix C – Article on Soho Neighbourhood Forum Website

12/12/2019 Final consultation on the draft Soho Neighbourhood Plan starts! - Soho Neighbourhood Forum

Soho Neighbourhood Forum

[CAMPAIGN](#) [GET INVOLVED](#) [NEWS](#) [QUESTIONNAIRE](#)

Final consultation on the draft Soho Neighbourhood Plan starts!

On Wednesday 17 July 2019, we formally launched formal Regulation 14 consultation on our draft Soho Neighbourhood Plan.

This is an exciting moment for Soho. For the first time the community has developed policies to draw up its own plan. We are now asking you to submit your thoughts!

[View the draft Soho Neighbourhood Plan](#)

Click here to view the [Executive Summary](https://planforsoho.files.wordpress.com/2019/07/exec-summary_email.pdf) (https://planforsoho.files.wordpress.com/2019/07/exec-summary_email.pdf)

Click here to view the [draft Soho Neighbourhood Plan](https://planforsoho.files.wordpress.com/2019/07/full-snp-draft-rev16-july-2019.pdf) (<https://planforsoho.files.wordpress.com/2019/07/full-snp-draft-rev16-july-2019.pdf>)

On the 'Documents' page on this website you will also find a range of important reference documents that have helped develop the draft Plan as well as the evidence base.

[Take part in the consultation today!](#)

[Click here to complete our online survey and give your views to help shape the final Plan](https://www.surveymonkey.co.uk/r/C6JF5Q) (<https://www.surveymonkey.co.uk/r/C6JF5Q>)

The survey will take approximately 15 minutes to complete and is a vital part of gathering feedback on the draft Plan. The questionnaire asks you to give your views on the draft Plan, so that the Plan can be amended and improved to better reflect the views of the whole community.

The consultation is open until 11:59 pm on Wednesday 11 September 2019.

Hard copies of the draft Plan and Executive Summary are also available to view at a number of locations around Soho, including:

- St Anne's Parish Office, 33 Doan Street, W1D 6AF
- Marshall Street Leisure Centre, 15 Marshall Street, W1F 7EL
- House of St Barnabas, 1 Greek Street, W1D 4NX

<https://planforsoho.org/2019/07/17/final-consultation-on-the-draft-soho-neighbourhood-plan-starts-2/>

12/12/2019 Final consultation on the draft Soho Neighbourhood Plan starts! - Soho Neighbourhood Forum

- Comm Comm UK, 3rd Floor Office, 1 Bouchier Street, W1D 4HX – Available Monday – Friday 10am-4pm. Please call 020 7125 0421 to make an appointment.

If you require the documents in a different format, please do get in touch with the team. Hard copies of the survey are also available on request, please call 0800 772 0475.

We will be hosting and attending a number of events across Soho during the consultation period. Keep up-to-date with events on our website and on social media.

[Recommendations and projects](#)

We first started consultation with the local community in 2016 and since then, we have spoken to hundreds of individuals. During this time, there have been many comments and ideas raised, which form part of the Recommendations and Projects section. These topics are important to Soho but are not land use planning matters, therefore are separate to the draft Plan. We are keen that bodies such as Westminster City Council, TfL and the property industry review and address the actions noted.

[Next steps](#)

It has been a long journey since our inaugural meeting in July 2015. Once we have analysed all the consultation responses and made any necessary alterations to the draft Plan, we will submit it to Westminster City Council for independent examination.

At the end of the process, there will be referendums of the business and residential communities of Soho. We need your support to ensure that the Plan comes into force. We will keep you updated as we move through the process.

[Contact](#)

If you have any queries on the draft Plan, how to get involved or require the documents in other formats, please contact:

anna.doyle@planforsoho.org

0800 772 0475

[17 JULY 2019 11 SEPTEMBER 2019 PLANFORSOHO ADMIN](#)

[Blog at WordPress.com.](#)

<https://planforsoho.org/2019/07/17/final-consultation-on-the-draft-soho-neighbourhood-plan-starts-2/>

Appendix D – Emails Issued to Soho Neighbourhood Forum Members

13/01/2020 Campaign Overview | Mailchimp

Take Part In The Consultation On The Draft Soho Neighbourhood Plan

[Campaign Preview](#) [HTML Source](#) [Plain-Text Email](#) [Details](#)



Consultation on the draft Soho Neighbourhood Plan starts!

Dear Member

This is an exciting moment for Soho. For the first time the community has developed policies to draw up its own plan. We now are writing to invite you to submit your views on the Soho Neighbourhood Forum's proposals for the draft Soho Neighbourhood Plan.

[View the Draft Soho Neighbourhood Plan](#)

This is a Pre-Submission Consultation in accordance with the requirements of the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2015 (as amended). The following consultation documents can be found on the Forum's website: www.planforsoho.org.

- Executive Summary
- Draft Soho Neighbourhood Plan – 2020 - 2040
- Recommendations and Projects.

<https://nl5.admin.mailchimp.com/campaigns/show/304-1236207>

21/01/2020 Campaign Overview | Mailchimp

Take Part in the Consultation Today

[Click here to complete our online survey and give your views to help shape the final Plan!](#)

The survey will take approximately 15 minutes to complete and is a vital part of gathering feedback on the draft Plan. The questionnaire asks you to give your views on the draft Plan, so that the Plan can be amended and improved to better reflect the views of the whole community.

The consultation is open until 5pm on Wednesday 11 September 2019.

Hard copies of the draft Plan and Executive Summary are also available to view at a number of locations around Soho, including:

- St Anne's Rectory, 55 Dean Street, W1D 6AF
- Marshall Street Leisure Centre, 15 Marshall Street, W1F 7EL
- House of St Barnabas, 1 Greek Street, W1D 4NX
- Comm Comm UK, 3rd Floor Office, 1 Bouchier Street, W1D 4HX – Available Monday – Friday 10am-4pm. Please call 020 7125 0421 to make an appointment.

If you require the documents in a different format, please do get in touch with the team. Hard copies of the survey are also available on request, please call 0800 772 0425.

We will be hosting and attending a number of events across Soho during the consultation period. Keep up-to-date with events on our website and on social media.

You can also send your comments directly to info@planforsoho.org or post to:

Matthew Bennett MBE

Chair

Soho Neighbourhood Forum

c/o House of St Barnabas

1 Greek Street

London W1D 4NQ

You must let us know if you live, work or visit Soho and please include your contact details. Responses must be received by 5pm on Wednesday 11 September 2019.

Data Protection

By submitting a response, you consent to your comments being held by Soho

<https://nl5.admin.mailchimp.com/campaigns/show/304-1236207>

11/01/2020

Campaign Overview | Mailchimp

By submitting a response, you consent to your comments being used by Soho Neighbourhood Forum and used solely for the purposes of developing the Soho Neighbourhood Plan. You also consent to your name, email address and postcode being recorded by Soho Neighbourhood Forum and to the publication of your comments as part of the statutory process of preparing the Neighbourhood Plan (including on the planforsoho.org website).

If you do not want your response to be publicly available please make this clear in writing when you submit your response.

Next Steps

It has been a long journey since our inaugural meeting in July 2015. Once we have analysed all the consultation responses and made any necessary alterations to the draft Plan, we will submit it to Westminster City Council for independent examination.

At the end of the process, there will be referendums of the business and residential communities of Soho. We need your support to ensure that the Plan comes into force. We will keep you updated as we move through the process.

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anna.doyle@planforsoho.org
0800 772 0475

Yours faithfully
Matthew Bennett MBE
Chair of the Soho Neighbourhood Forum



https://eu15.admin.mailchimp.com/campaigns/show/56-1236207

21/01/2020

Campaign Overview | Mailchimp



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You are receiving this email because you may have opted in at our website to be kept updated with Plan for Soho progress. Additionally, this survey's purpose is to ensure anyone living or working in Soho (the designated Soho Neighbourhood Plan area) has the opportunity to respond to the Forum's draft Aspirations for Policy development.

Our mailing address is:
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c/o The House of St. Barnabas
1 Greek Street
LONDON, London W1D 4NQ
United Kingdom

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11/01/2020

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Take Part In The Consultation On The Draft Soho Neighbourhood Plan

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https://eu15.admin.mailchimp.com/campaigns/show/56-1239187

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London W1D 4NQ

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Chair of the Soho Neighbourhood Forum



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Soho Neighbourhood Plan - Pre-Submission Consultation For Consultees

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[View this email in your browser](#)



Please join Plan For Soho at:

[My Place Cafe, 21 Renwick Street, Soho W1F 0PZ for informal drinks.](#)
Wednesday 21st August 5-7pm

Come and discuss the plan and fill out the survey in Soho's friendliest local cafe!

Please RSVP by Monday 19th August so that we have an idea of numbers.

We looking forward to seeing you on Wednesday!

About Us

This plan is a neighbourhood plan using the powers created by the Localism Act 2011 to give people living and working in an area such as Soho the right to draw up their own plans. The Soho Neighbourhood Area (SNA) was decided upon in May 2013 and the Soho Neighbourhood Forum was designated on 25th July 2014 as a business neighbourhood forum, which is led by a Forum Steering Group (FSG) of 50/50 residents and businesses.

The FSG quickly agreed a vision for the Forum to work towards. Soho is a very diverse and intensively used area with many competing interests. It was decided that the best way to proceed was 'bottom up'. In other words, to consult first to identify what people felt the key issues to be. Then devise some very simple objectives (which we called aspirations) to address those key issues. Check back with those who had lived a range of key stakeholders.

17p0/rel15.soho@mailchimp.com/campaign/show/36-1239187

whether those aspirations were widely supported and gauge the level of support for each. Then proceed with detailed policy work built on that foundation of community views.

That is what we have done. Some of the ideas that came forward in the process were just not matters that can be covered in a neighbourhood plan, so we have produced a non-statutory (i.e. not legally binding) set of recommendations and projects to put forward to bodies like Westminster City Council and Transport for London, which we ask them to carefully consider to help achieve the overall vision for Soho.



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Plan For Soho Special Q&A Event TOMORROW Thursday 29 August

[Campaign Preview](#) [HTML Source](#) [Plain-Text Email](#) [Details](#)

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<https://us15.admin.mailchimp.com/campaigns/show?id=125675>

Plan For Soho Special Q&A Event TOMORROW Thursday 29 August 6- 8pm

[Campaign Preview](#) [HTML Source](#) [Plain-Text Email](#) [Details](#)

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<https://us15.admin.mailchimp.com/campaigns/show?id=125677>

Dear Member,

We hope you are all enjoying the balmy summer weather. We wanted to remind you all that we have a special FREE Q&A event tomorrow evening at St Anne's Church, 55 Dean Street, Soho - Thursday 29 August from 5pm - 7pm with members from the Soho Neighbourhood Forum including local resident and Chair of the Forum, Matthew Bennett, CEO, New West End Company, Jace Tyrell and CEO, Comm Comm Jessica Stewart hosting the Q&A session.

It is a great opportunity to find out more about the Plan - which you can read here: <https://planforsoho.org> and if you have not already please do tell us via the online survey your thoughts. There are hard copies of the draft Plan available too around Soho, with all information on locations on our website.

Yours sincerely

Plan for Soho



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Plan for Soho - House of St Barnabas - 1 Great Street - LONDON, London W1 - United Kingdom



10

<https://us15.admin.mailchimp.com/campaigns/show?id=125675>

23

Dear Member,

CORRECTION: The start and end times are 6pm - 8pm NOT 5- 7pm - we do apologise for this and do hope to see you tomorrow.

We hope you are all enjoying the balmy summer weather. We wanted to remind you all that we have a special FREE Q&A event tomorrow evening at St Anne's Church, 55 Dean Street, Soho - Thursday 29 August from 6pm - 8pm with members from the Soho Neighbourhood Forum including local resident and Chair of the Forum, Matthew Bennett, CEO, New West End Company, Jace Tyrell and CEO, Comm Comm Jessica Stewart hosting the Q&A session.

It is a great opportunity to find out more about the Plan - which you can read here: <https://planforsoho.org> and if you have not already please do tell us via the online survey your thoughts. There are hard copies of the draft Plan available too around Soho, with all information on locations on our website.

Yours sincerely

Plan for Soho



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<https://us15.admin.mailchimp.com/campaigns/show?id=125677>

23

Soho Neighbourhood Plan - Pre-Submission Consultation For Consultees Closed

[Campaign Preview](#) | [HTML Source](#) | [Plain-Text Email](#) | [Details](#)

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Dear Member,

The summer has come to a close and Plan for Soho has now closed the formal Regulation 14 consultation on our draft Soho Neighbourhood Plan.

Thank you to all who have completed the Plan for Soho pre-consultation survey!

Our team will be working to analyse all the comments and make necessary changes in the light of them before submitting the final plan to WCC to start the adoption process. Please do check our social media and website to keep up to dated with progress.

About Us

This plan is a neighbourhood plan using the powers created by the Localism Act 2011 to give people living and working in an area such as Soho the right to draw up their own plans.

The Soho Neighbourhood Area (SNA) was decided upon in May 2013 and the Soho Neighbourhood Forum was designated on 25th July 2014 as a business neighbourhood forum which is led by a Forum Steering Group (FSG) of 50/50

residents and businesses.

The FSG quickly agreed a vision for the Forum to work towards. Soho is a very diverse and intensively used area with many competing interests. It was decided that the best way to proceed was 'bottom up'. In other words, to consult first to identify what people felt the key issues to be and devise some very simple objectives (which we called 'aspirations,') to address those key issues.

We have then checked with those consulted in addition to a range of key stakeholders on whether those aspirations were widely supported and gauge the level of support for each. We then proceeded with detailed policy work, built on the foundation of community views.

Some of the ideas that came forward in the process were just not matters that can be covered in a neighbourhood plan, so we have produced a non-statutory (i.e. not legally binding) set of recommendations and projects to put forward to bodies like Westminster City Council and Transport for London, which we ask them to carefully consider to help achieve the overall vision for Soho.

Please do review our website www.planforsoho.org and our social channels to keep updated!



Appendix E – Flyer

SOHO ISH SOHO



SOHO
SOHO
SOHO
SOHO
SOHO
SOHO

Soho Neighbourhood Forum

Find Soho Neighbourhood Forum at the Soho Village Fete to support the plan!

Sunday 30 June 2019
12pm-6pm
Wardour Street, London

The Soho Neighbourhood Forum will be on-hand to update you on the draft Neighbourhood Plan and our upcoming activities and events this year.

We are keen to protect Soho's reputation for creativity and diversity. Our Draft Plan supports the heritage of Soho while enhancing sustainable growth.

Do you live, work or visit Soho? We need you!

Sign-up as a member to the Forum to keep updated on the latest news and come along to our AGM to find out more. Soho Neighbourhood Forum AGM:

Wednesday 3 July 2019
6pm-7.45pm
First Floor
Conference Room
29-39 Soho Square
W1D 3QS

PLAN FOR SOHO

SOHO ISH SOHO

We have consulted widely and drafted our plan which has a range of important policies for Soho.

In summary

- Future proposals must respect the existing size and scale of the conservation area with any larger scale development only supported on the boundaries of Soho.
- Development should avoid large ground floor lobbies and have smaller floor plates which are multi let to prevent Soho just becoming a home for large corporates.
- Proposals for a mixture of uses and space for start-ups and creative industries will be strongly supported.
- A policy to prevent future further concentrations of

- restaurant and bar use which drive out other ground floor uses.
- Support for small scale new live music entertainment venues.
- New housing required as part of development to be built within Soho and car free.
- A range of environmental policies to green the area, improve its air quality, tackle waste bags being left on the pavement introduce food waste recycling and improve facilities for cycling and pedestrians.

We will be consulting as many as we can of those who live and work in Soho over the summer to get your support and feed back with the aim of submitting the plan to Westminster City Council in the autumn to start the formal process to get the plan approved so that it can come into force.

planforsoho.org
anna.doyle@planforsoho.com
planforsoho

planforsoho
planforsoho
planforsoho



SOHO ISH SOHO

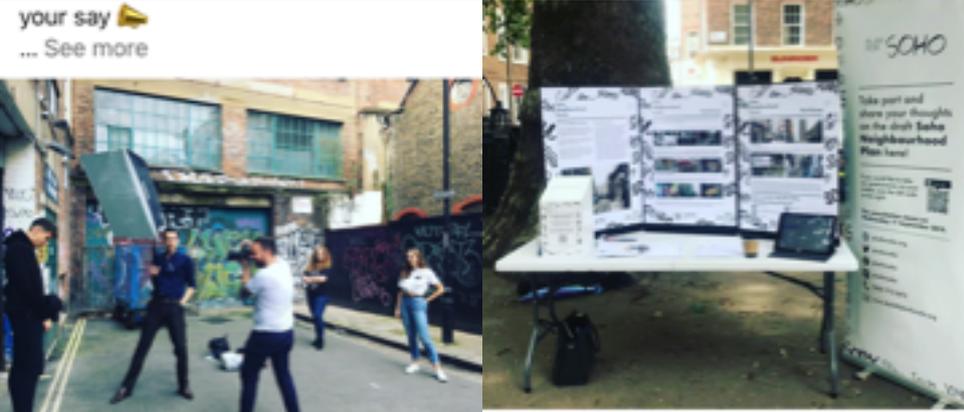
Appendix F – Social Media Posts

Facebook Posts

VIVO 4G 17:11 14% VIVO 4G 17:12 14%

Page Page

your say ... See more



2 You and 2 others 5 comments

Like Comment Share

58 people reached > Boost Post 84 people reached > Boost Post

VIVO 4G 17:13 14% VIVO 4G 17:13 14%

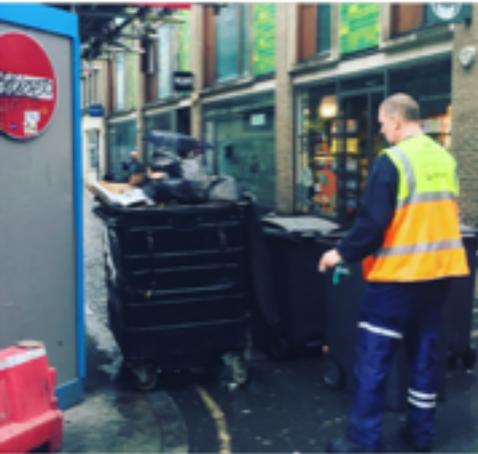
Page Page



2 1 share 2

Like Comment Share Like Comment Share

208 people reached > Boost Post 59 people reached > Boost Post



2 2 comments 1 share
Like Comment Share

320 people reached >

Boost Post



3 2 shares
Like Comment Share

184 people reached >

Boost Post



September 11th! 🎉👁️

Don't miss this opportunity t... See more

Countdown to

Plan for Soho Consultation ends!

Sep 11, 2019 at 11:59:59 pm

TIMEANDDATE.COM
Plan for Soho Consultation ends!
Countdown to Sep 11, 2019 11:59:59 p...

Like Comment Share

54 people reached >

Boost Post



30th June at The Soho Fete and give us your views on the draft neighbourhood plan for Soho. We will have a stall at the fete and we would like to hear your thoughts and update you on our upcoming... See more

Soho Neighbourhood Forum

Find Soho Neighbourhood Forum at the Soho Summer Fete to complete the plan!

Sunday 30 June 2019
11am-8pm
Wandour Street, London

Do you live, work or visit Soho? We need you!

Sign up as a member to the Forum to keep updated on the latest news and come along to our AGM to find out more. Soho Neighbourhood Forum AGM.

Wednesday 3 July 2019
6pm-8pm
Flat Floor
Conference Room
20-29 Soho Square
W1D 3QS

We have consulted widely and drafted our plan which has a range of important policies for Soho.

In summary

- *Future proposals must respect the existing size and scale of the conservation area with any larger scale development only approved on the boundaries of Soho.
- *Development should avoid large ground floor habitable and new street floor plans which are built within Soho and car free.
- *Proposals for a mixture of use and space for shops and creative industries will be strongly supported.
- *A policy to prevent future further extensions of
- *New housing required as part of development to be built within Soho and car free.
- *A range of environmental policies to green the street, improve air quality, reduce waste bags being left on the pavement, encourage food waste recycling and improve facilities for cycling and pedestrians.

We will be consulting as many as we can of those who live and work in Soho and the members to get your support and feed back with the aim of submitting the plan to Westminster City Council in the summer to start the formal process to get the plan approved so that it can come into force.

1
Like Comment Share

49 people reached >

Boost Post



Twitter Posts

📶 O2-UK 3G 11:53 20% 🔋 📶 O2-UK 4G ✨ 11:51 ↗️ 21% 🔋

✕ 🔒 Tweet activity



Plan For Soho
@planforsoho
@planforsoho consultation is over, what now? #Soho We will review comments & findings, consider feedback from official bodies like @MayorofLondon @HistoricEngland in order to make any amends & we will announce the winner of dinner for 2! Watch this space!
#neighbourhoodplan
pic.twitter.com/opeVYk21uu

Impressions 1,580
times people saw this Tweet on Twitter

Total engagements 26
times people interacted with this Tweet

📶 O2-UK 4G 11:51 22% 🔋 📶 O2-UK 4G ✨ 11:50 22% 🔋

✕ 🔒 Tweet activity



Plan For Soho
@planforsoho
#SOHO Consultation ends at midnight tomorrow - don't delay ✨ complete our survey today read the plan for Soho and give us your views 🙌🎉 Chance to WIN dinner for 2 in Soho - when you complete your survey ✨🎉
@BerW1ckStMarket
https://www.surveymonkey.co.uk/r/LC6J75Q@MedCafeSoho ...
@randallandaubin
@savesoho
pic.twitter.com/hl8RLTNXEC

Impressions 2,301
times people saw this Tweet on Twitter

Total engagements 73
times people interacted with this Tweet

✕ 🔒 Tweet activity

Plan For Soho @planforsoho
FINAL DAY of consultation - SOHO you have until midnight TONIGHT to get feedback IN! 📣
https://www.surveymonkey.co.uk/r/LC6J75Q read the plan & feedback HERE
@BerW1ckStMarket @clarelynchred @SohoGeorge @mikewarburton @TalesPan @CommComm_UK @ilovesoholondon @TheBaristas @MPSSoho @stateofsoho

Impressions 3,616
times people saw this Tweet on Twitter

Total engagements 47
times people interacted with this Tweet

[View all engagements](#)

✕ 🔒 Tweet activity



Plan For Soho
@planforsoho
3 days left to comment folks that's it! Follow link in bio #soho
@BerW1ckStMarket @sohosocietyw1 @planforsoho @clarelynchred @SohoGeorge
https://www.surveymonkey.co.uk/r/LC6J75Q
pic.twitter.com/PqE0GvFlf4

Impressions 1,239
times people saw this Tweet on Twitter

Total engagements 36
times people interacted with this Tweet

[View all engagements](#)

Tweet activity

Plan For Soho @planforsoho
 5-alive! 5 days to go until consultation ends - Soho read the plan and fill in the survey here! <https://www.surveymonkey.co.uk/r/LC6J75Q> and can any sohoites tell us where this 5 is?
#soho #mystery #planning #neighbourhoodplan
<pic.twitter.com/LDTRCKASuR>

Impressions 414
 times people saw this Tweet on Twitter

Total engagements 2
 times people interacted with this Tweet

[View all engagements](#)

Tweet activity

Plan For Soho @planforsoho
 SOHO! ✨ 7 days to go until consultation ends - get stuck in!! Tell us what you think of the plan - READ it & feedback HERE! <https://www.surveymonkey.co.uk/r/LC6J75Q> . **#soho #planforsoho #london**
@BerW1ckStMarket @CityWestminster @ilovesoholondon @thisissoho @SohoGeorge @MPSSoho @sohoite
<pic.twitter.com/LFOsITSnqz>

Impressions 1,947
 times people saw this Tweet on Twitter

Media views 122
 all views (autoplay and click) of your media are counted across videos, vines, gifs, and images

Total engagements 25
 times people interacted with this Tweet

[View all engagements](#)

Tweet activity

Plan For Soho @planforsoho
 6 days to go till consultation ends! 📢 Have you CLICKED yet? Do it now don't delay HERE
<https://www.surveymonkey.co.uk/r/LC6J75Q> this is Soho's only opportunity to shape its own future **#soho #community**
@clarelynchred @sohoradio @BerW1ckStMarket @MPSSoho @TalesPan @SohoGeorge @SohoParishScoop
<pic.twitter.com/n8SPmSwG9a>

Impressions 2,859
 times people saw this Tweet on Twitter

Media views 178
 all views (autoplay and click) of your media are counted across videos, vines, gifs, and images

Total engagements 46
 times people interacted with this Tweet

Tweet activity

Plan For Soho @planforsoho
 8 days left - <https://www.surveymonkey.co.uk/r/LC6J75Q> Soho it takes 20 mins to read the exec summary & give us your views
<pic.twitter.com/1SGHwwYiok>

Impressions 1,564
 times people saw this Tweet on Twitter

Media views 165
 all views (autoplay and click) of your media are counted across videos, vines, gifs, and images

Total engagements 17
 times people interacted with this Tweet

[View all engagements](#)



Tweet activity

Plan For Soho
@planforsoho
Happening now
@HoStBarnabas
business breakfast until
10.30 to fill in the plan if
you would like to come
along DM us
pic.twitter.com/deCEDIU
pQb

Impressions 294
times people saw this Tweet on Twitter

Total engagements 7
times people interacted with this Tweet

[View all engagements](#)

Tweet activity

Plan For Soho @planforsoho
9 DAYS LEFT! #Soho don't just tweet, take
action NOW We need feedback to create a
100% viable planning document for Future
Soho - read the plan & feedback HERE
<https://www.surveymonkey.co.uk/r/LC6J75Q>
@BerW1ckStMarket @clarelynchred
@sohoradio @TheBaristas @MPSSoho
@savesoho @Gailporter
pic.twitter.com/SZWqxGr2Qt

Impressions 10,920
times people saw this Tweet on Twitter

Media views 1,336
all views (autoplay and click) of your media are
counted across videos, vines, gifs, and images

Total engagements 92
times people interacted with this Tweet

[View all engagements](#)

Tweet activity


Plan For Soho
@planforsoho
We are holding a
business breakfast
consultation at 830am
tomorrow
@HoStBarnabas
for
early birds, if you have a
business in Soho please
DM us - can't make
breakfast ? Read the
plan & fill in survey here!
<https://www.surveymonkey.co.uk/r/LC6J75Q>
pic.twitter.com/dbLkLI0
wrg

Impressions 1,214
times people saw this Tweet on Twitter

Total engagements 28
times people interacted with this Tweet

[View all engagements](#)

Tweet activity

Plan For Soho @planforsoho
Good Morning Soho! ONLY 11 days to
read & comment on @planforsoho draft
plan! We need
views/challenges/comments to help us
move to final stage & make edits PLEASE
read & comment on the plan HERE
<https://www.surveymonkey.co.uk/r/LC6J75Q>
@BerW1ckStMarket @SohoGeorge
@clarelynchred @mikewarburton

Impressions 1,628
times people saw this Tweet on Twitter

Total engagements 29
times people interacted with this Tweet

[View all engagements](#)



✕ Tweet activity

Plan For Soho @planforsoho
Tonight we are at @AnnesSoho 55Dean Street, Soho, 6-8pm for a Q&A about the survey - join us, fill in the survey ask any questions - with drinks & nibbles 🍷🍷
🌟 #soho #planforsoho #london #community @BerW1ckStMarket @SohoGeorge @MPSSoho @sohoradio
https://twitter.com/Westminster_LCC/status/1166986491463159808 ...

Impressions 3,635
times people saw this Tweet on Twitter

Total engagements 45
times people interacted with this Tweet

[View all engagements](#)



✕ Tweet activity

Plan For Soho @planforsoho
SOHO! Diary dates - Plan For Soho is hosting a Q& A on the plan @AnnesSoho this Thursday (29.8) from 6pm - 8pm all welcome 🙏 If you can't make this date please complete the survey & read the plan here!
<https://www.surveymonkey.co.uk/r/LC6J75Q> #soho @BerW1ckStMarket @AnnesSoho #consultation

Impressions 2,350
times people saw this Tweet on Twitter

Total engagements 93
times people interacted with this Tweet

[View all engagements](#)



✕ Tweet activity


Plan For Soho @planforsoho
Today! Plan for Soho are in Gokden Square 12-2pm join us to fill in our survey and tell us your thoughts on Soho
#soho #community #heritage #entertainment #nighttimeeconomy #livemusic #housing #environment #residents #business #greening
<pic.twitter.com/HOrhP1zQ4D>

Impressions 4,348
times people saw this Tweet on Twitter

Total engagements 92
times people interacted with this Tweet

✕ Tweet activity


Plan For Soho @planforsoho
Wednesday 21st - Plan for Soho will be out and about today in #Soho 12-pm we're in Rupert Street and 5-7pm join us for a drink @myplacesoho and fill in the survey - see you later!
@BerW1ckStMarket @clarelynchred @SohoGeorge @MPSSoho @sohosocietyw1 @sohocub @randallandaubin
<pic.twitter.com/iUhlRgn4Ee>

Impressions 5,042
times people saw this Tweet on Twitter

Total engagements 128
times people interacted with this Tweet

Tweet activity

Plan For Soho @planforsoho
 Thank you 🙏 Berwick st! & there's more to come! Next wk - Wednesday we are in Rupert St 12-2pm & @myplacesoho 5-7pm for drinkies - or READ the plan & fill in survey NOW
<https://www.surveymonkey.co.uk/r/LC6J75Q> @BerW1ckStMarket @myplacesoho @randallandaubin @SohoGeorge @rachwadd123 @TheBaristas
 pic.twitter.com/LhEu8CLQil

Tweet activity

Plan For Soho @planforsoho
 We're BERWICK STREET MARKET TODAY 🎉 12-2pm come & meet & fill in the @planforsoho survey - every survey goes into a draw to #WIN dinner for 2 in Soho 🍷🍷🍷 @BerW1ckStMarket @sohoite @YauatchaSoho @Milroys @MPSSoho @sohosocietyw1 @sohocub @QuoVadisSoho @myplacesoho #soho
 pic.twitter.com/YHhbmtBZYS

Impressions 3,905
 times people saw this Tweet on Twitter

Media views 564
 all views (autoplay and click) of your media are counted across videos, vines, gifs, and images

Total engagements 116
 times people interacted with this Tweet

Impressions 2,638
 times people saw this Tweet on Twitter

Media views 352
 all views (autoplay and click) of your media are counted across videos, vines, gifs, and images

Total engagements 65
 times people interacted with this Tweet

[View all engagements](#)

Tweet activity

Plan For Soho @planforsoho
 Plan for Soho in BERWICK STREET today is cancelled we will be there TOMORROW instead!! 12-2pm THURSDAY @BerW1ckStMarket @sohoite @SohoGeorge @sohosocietyw1 @MPSSoho @TheBaristas @sohocub @Milroys @YauatchaSoho @thesohohobo @myplacesoho @sohoradio @QuoVadisSoho @savesoho pic.twitter.com/mk3nKffeYC

Tweet activity

Plan For Soho @planforsoho
 @planforsoho Is available to read hard copy at the following Soho locations 🍷 Marshall Street Leisure Centre, Marshall st. 🍷 @AnnesSoho 55 Dean Street 🍷 @HoStBarnabas Greek St 🍷 @CommComm_UK Bourchier St - fill out the survey or online
<https://www.surveymonkey.co.uk/r/LC6J75Q> #soho

Impressions 6,695
 times people saw this Tweet on Twitter

Media views 727
 all views (autoplay and click) of your media are counted across videos, vines, gifs, and images

Total engagements 206
 times people interacted with this Tweet

Impressions 918
 times people saw this Tweet on Twitter

Total engagements 13
 times people interacted with this Tweet

[View all engagements](#)

[View all engagements](#)



Tweet activity

Plan For Soho @planforsoho
 Soho workers/businesses & residents - read copies of the Soho Plan & fill in the survey at **#MarshallStreetLeisureCentre** Marshall Street - consultation ends on 11.9 fill in the survey online or in person NOW & enter a draw to **#WIN** dinner for 2! 🍷🍷
#soho #community #london
 pic.twitter.com/2ZPZWCpZp8

Impressions 542
 times people saw this Tweet on Twitter

Media views 87
 all views (autoplay and click) of your media are counted across videos, vines, gifs, and images

Total engagements 11
 times people interacted with this Tweet

[View all engagements](#)

Tweet activity



Plan For Soho @planforsoho
 SOHO - Happening NOW @planforsoho in Soho square till 2 pm. Come & fill in survey & ask any questions Visitors/Residents/Businesses 🍷🍷 See you soon!
 🍷🍷 All surveys go into a draw to win dinner for 2 at a Soho restaurant!
#soho #london #sohoresident #sohobusiness #sohosquare
 pic.twitter.com/nnWzRNXB0p

Impressions 3,355
 times people saw this Tweet on Twitter

Total engagements 42
 times people interacted with this Tweet

Tweet activity



Plan For Soho @planforsoho
 Thank you! all who joined us in Soho Sq yesterday. We are in **#BerwickStreetMarket** nwt Weds 14th August 12-2pm come & meet us, read the plan & complete the survey!
 🍷🍷 **#Win** dinner 4 2 in Soho **#drawentry** for every completed survey
<https://www.surveymonkey.co.uk/r/LC6J75Q>
 pic.twitter.com/fl7cEYV DX

Impressions 1,354
 times people saw this Tweet on Twitter

Total engagements 44
 times people interacted with this Tweet

Tweet activity



Plan For Soho @planforsoho
 Want to fill in the survey and read a hard copy of the plan ? Head over to **@EveryoneActive** Marshall Street Leisure centre to fill in our survey today - there are hard copies of the plan or QR codes to connect online **#soho #planforsoho #neighbourhoodplanning**
 pic.twitter.com/poRh6dYWr3

Impressions 2,351
 times people saw this Tweet on Twitter

Total engagements 48
 times people interacted with this Tweet



Tweet activity

Plan For Soho @planforsoho
 Woohoo 🎉🎉 117 respondents
 @planforsoho survey so far! Amazing! 😊
 have you done it? Read & give us your
 views while you are watching telly! CLICK
 NOW! Dinner for 2 prize draw on entry
<https://www.surveymonkey.co.uk/r/LC6J75Q>
 #soho #local #london #follow
 #survey #win #planning #neighbourhood

Impressions 1,553
 times people saw this Tweet on Twitter

Total engagements 27
 times people interacted with this Tweet

[View all engagements](#)



Tweet activity



Plan For Soho @planforsoho
 🎉🎉 DIARY DATES 🎉🎉
 @planforsoho are in
 @myplacesoho 🎉🎉 21st
 August 🎉🎉 to talk about
 the Plan 5-7pm - come
 and meet us & fill in the
 survey over a glass of
 Dini & Sam's finest.
 Can't make the 21st? Fill
 the survey in here
<https://www.surveymonkey.co.uk/r/LC6J75Q>
<pic.twitter.com/GcG8QM9vZD>

Impressions 2,666
 times people saw this Tweet on Twitter

Total engagements 55
 times people interacted with this Tweet

[View all engagements](#)



Tweet activity



Plan For Soho @planforsoho
 Plan for Soho will be in
 Soho Square this
 Wednesday 7th August
 12-2pm talking about
 the plan. Come & see us
 & have a chat - we will
 have iPads ready so you
 can fill in the survey!
 🎉🎉 #soho #community
 #planforsoho
 #planning
 @CityWestminster
 @ilovesoholondon
 @CommComm_UK
<pic.twitter.com/GQeDARh2Kx>

Impressions 5,989
 times people saw this Tweet on Twitter

Total engagements 102
 times people interacted with this Tweet



Tweet activity

Plan For Soho @planforsoho
 Hi there we will be showing Soho from all
 angles on a daily basis - don't worry lots
 more photos on the way 🎉🎉
 workers/business/residents and visitors
 @planforsoho
https://twitter.com/T_A_T_P/status/1156521826295713792 ...

Impressions 638
 times people saw this Tweet on Twitter

Total engagements 12
 times people interacted with this Tweet

[View all engagements](#)



Reach a bigger audience

✕ Tweet activity

Plan For Soho @planforsoho
Soho! Here's a link to the plan and survey - takes 5 mins or 30 if you have lots of comments - 42 days to go! completed surveys enter a draw to #win dinner for 2 🍗 <https://www.surveymonkey.co.uk/r/LC6J75Q> #soho #culture #heritage #nightlife #housing #environment #residents #businesses

Impressions 884
times people saw this Tweet on Twitter

Total engagements 21
times people interacted with this Tweet

[View all engagements](#)

✕ Tweet activity



Plan For Soho @planforsoho
Plan for Soho's consultation is LIVE - 43 days left to give us your views! Whatever you love about Soho - Culture/Heritage/Environment/Housing/Nighttime Economy- Soho residents/businesses and visitors we need your views on the plan - follow link in our bio to complete NOW 📣📣
pic.twitter.com/EMrBQZp5XS

Impressions 25,371
times people saw this Tweet on Twitter

Total engagements 326
times people interacted with this Tweet

✕ Tweet activity


Plan For Soho @planforsoho
Soho Calling! Plan for Soho Consultation is now LIVE! Read the plan here!
<https://planforsoho.files.wordpress.com/2019/07/full-snp-draft-rev16-july-2019.pdf> ... and then take our SURVEY here
<https://www.surveymonkey.co.uk/r/LC6J75Q>
we want your views!
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<https://planforsoho.files.wordpress.com/2019/07/full-snp-draft-rev16-july-2019.pdf> ...
#soho @BerW1ckStMarket @sohoite @SohoGeorge @sohosocietyw1 @MPSSoho @sohoradio @clarelynchred

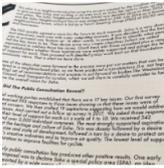
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Plan For Soho
 @planforsoho
 Plan for Soho AGM is tomorrow night - WEDNESDAY 3rd JULY at the Soho Health Centre 1st Floor 29-30 Soho Square, join us to find out what's next for our neighbourhood plan
 #soho #planning #neighbourhoodplan #AGM
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Plan For Soho @planforsoho
 "Westminster's city plan appears to have stolen many of our good policies it's a double edged sword" says Matthew Bennet of @planforsoho @CityWestminster We're on @sohoradio now! #soho #london #planning #development @pancho_lewis @CampaignTim @JonathanGlanz

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 The Westminster City Plan - with a whole Soho section & heavily influenced by @planforsoho draft - consultation closes today st 5pm! #soho
<https://westminster.us1.list-manage.com/track/click?u=a50c8b0dd980669ef713b4cca&id=b5379022f6&e=fc1287d629> ...

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 Plan for Soho in BERWICK STREET today is cancelled we will be there TOMORROW instead!! 12-2pm THURSDAY
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 @SohoGeorge @sohosocietyw1
 @MPSSoho @TheBaristas @sohocub
 @Milroys @YauatchaSoho
 @thesohohobo @myplacesoho
 @sohoradio @QuoVadisSoho
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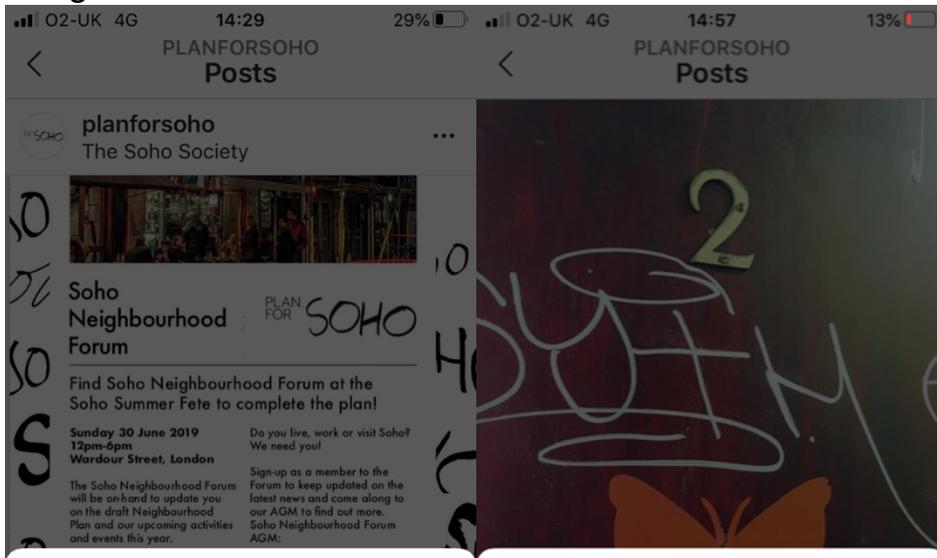
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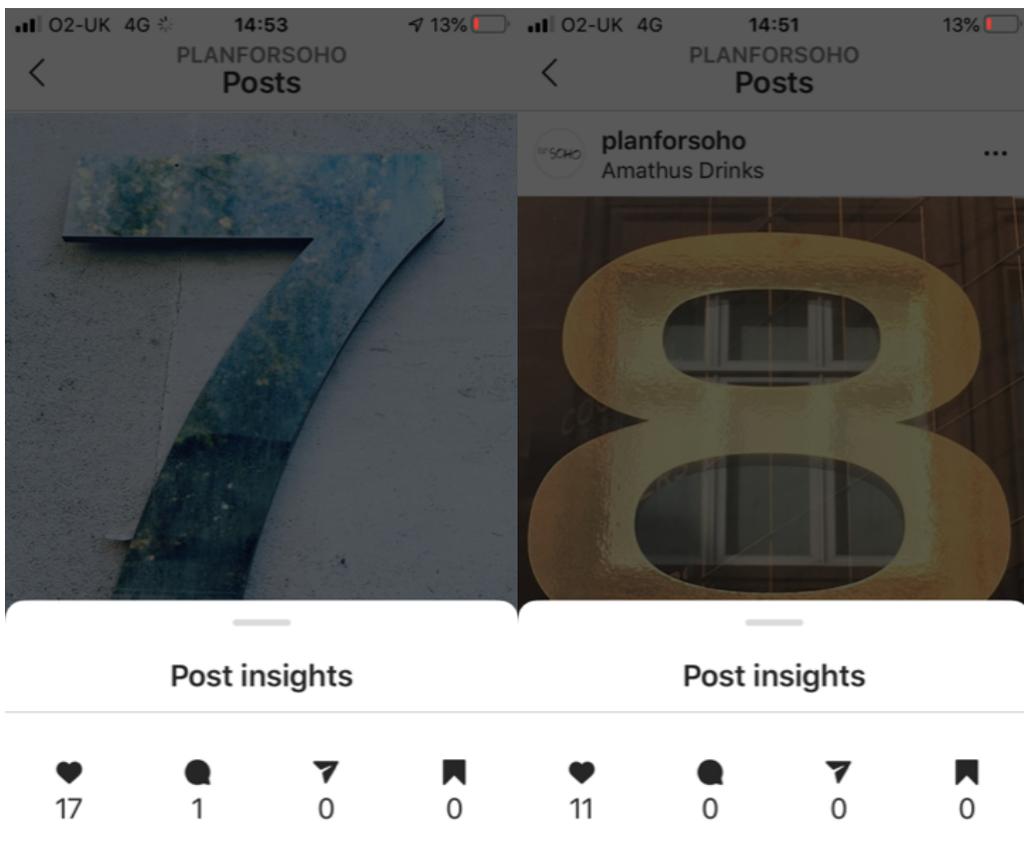
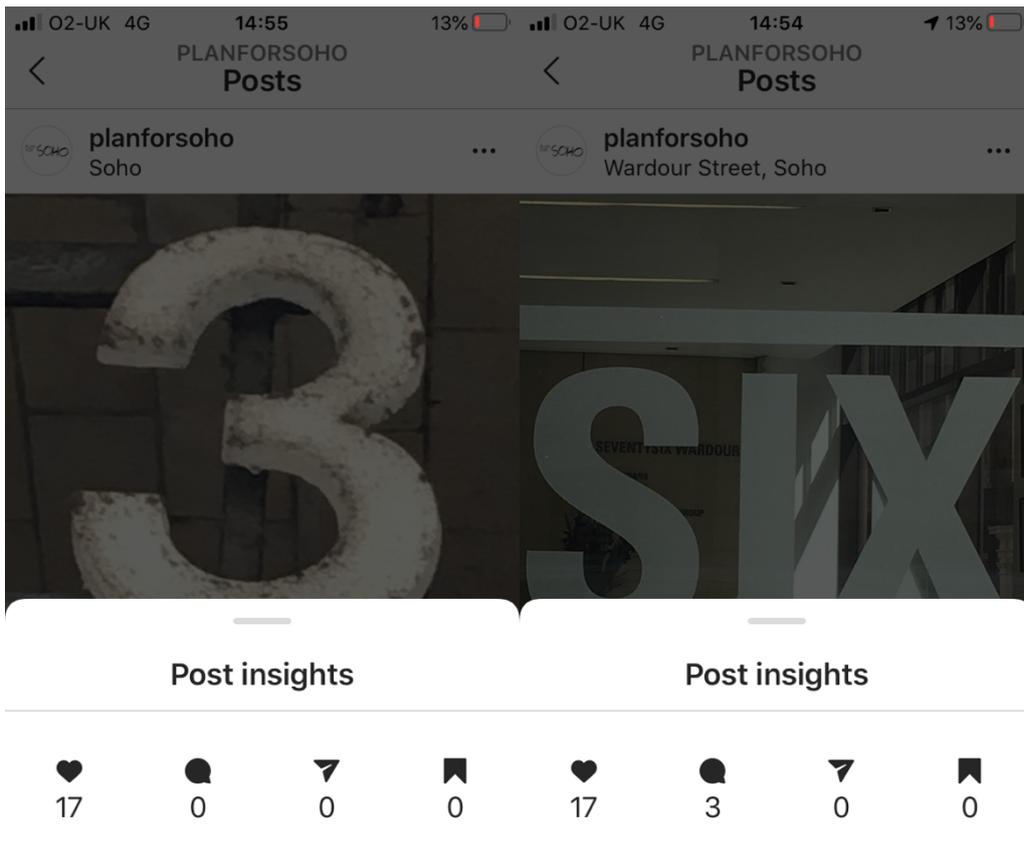
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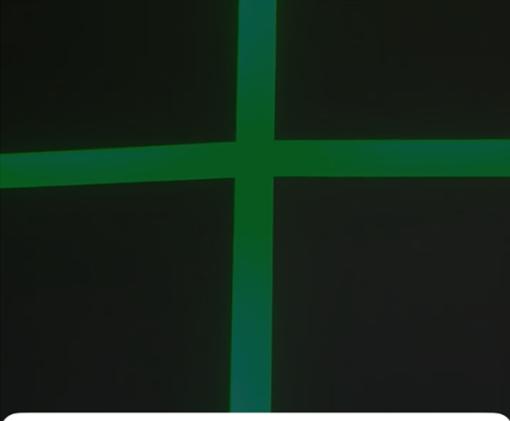
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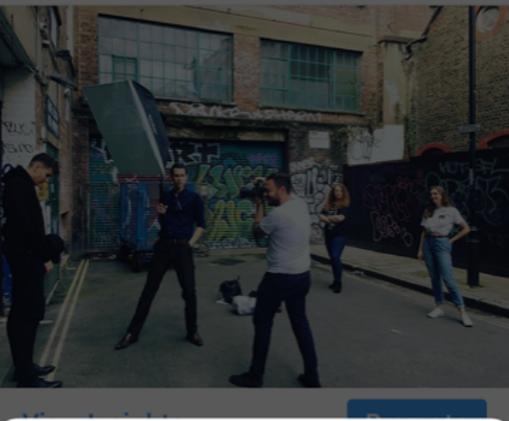
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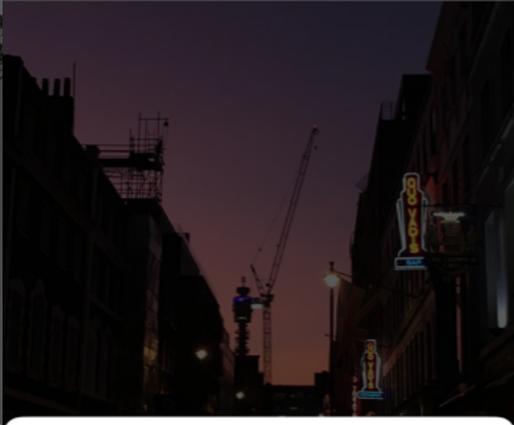


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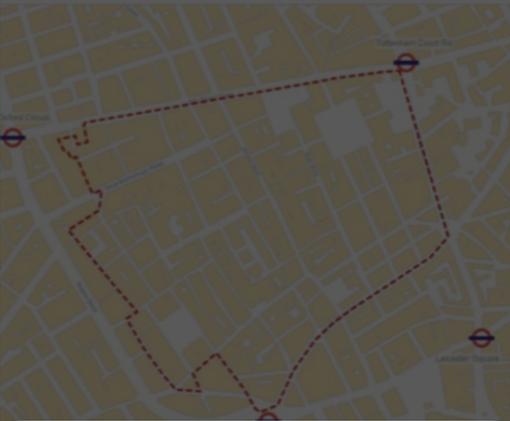


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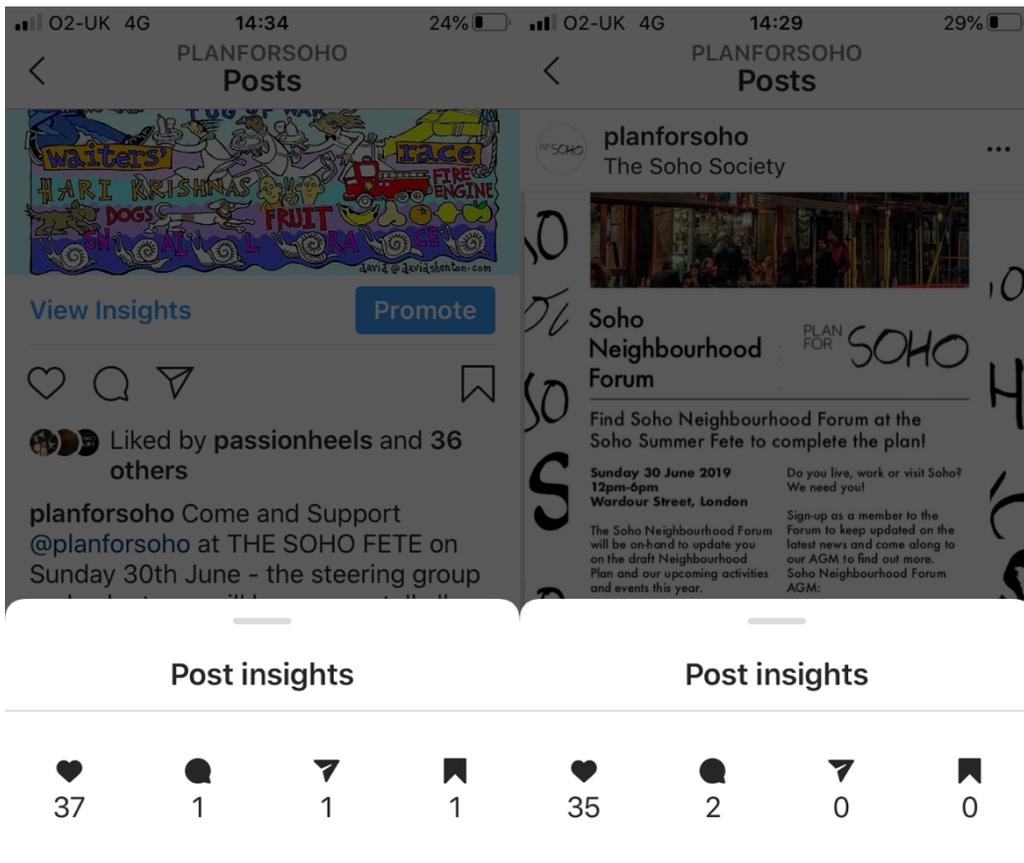
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Appendix G – Statutory Consultee Feedback

Greater London Authority

Dear Anna Doyle

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

The Draft New London Plan

As you are aware, the Mayor published his Draft London Plan for consultation on 1st December 2017 and the Draft London Plan consolidated suggested changes (following examination hearings) on 16 July 2019. Publication of the final version is anticipated in Winter 2019/20. Once published, the new London Plan will form part of the Westminster and the neighbourhood forum's Development Plan and contain the most up-to-date policies. Given the timing, it is likely that the neighbourhood plan will need to be in general conformity with the new London Plan. In addition, the Draft London Plan and its evidence base are now material considerations. In this regard officers welcome the draft Neighbourhood Plan's reference to the published and draft new London Plans. The Soho Neighbourhood Plan is in general conformity with the current and emerging London Plans and the Officer's response below is guidance which should be followed to improve the emerging neighbourhood plan and align it more closely with the draft new London Plan.

General

The extent of the neighbourhood plan area is set out clearly and precisely at the very start and this is welcomed by Officers. A finer grain map would be useful to ensure that where the edge of the neighbourhood area does not follow a road it is clear which land is contained within the established boundary. The objectives of the Soho Neighbourhood Plan (SNP) are set out clearly at paragraph 5.2 and the fact that they are the clear result of earlier consultation and community engagement is very welcome.

Neighbourhood planning provides communities with the opportunity to set out a positive vision for how they want their community to develop over the next ten, fifteen or twenty years. It is about enabling rather than restricting development and a neighbourhood plan should demonstrate how it positively contributes towards achieving good growth. The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development. While Officers consider that the Neighbourhood Plan would positively contribute towards achieving some elements of sustainable development, it should help contribute more positively and proactively towards the implementation of the emerging Westminster City Plan and the London Plan in meeting the borough's growth needs. Such an approach is one which recognises and reflects Westminster's annual housing target, as set out in the borough's draft Local Plan for the delivery of 1,495 new homes a year (for the first 10 years) and to provide capacity for 63,000 new jobs up to 2040. The SNP is encouraged to identify

and allocate sites, especially small sites to support the delivery of this established need over the plan period.

New updated national guidance on neighbourhood planning has been published recently and should be taken into account by the neighbourhood forum. New paragraphs 100-106 of the National Planning Guidance now set out information on housing requirement figures, making it clear that an indicative housing requirement figure can be requested by a neighbourhood planning body based on local authority's local housing need as a starting point. If Westminster Council is unable to provide a housing requirement figure, or set out an indicative one, the Neighbourhood Forum should instead consider using the [neighbourhood planning toolkit on housing needs assessment](#) for this purpose.

Context

The Tottenham Court Road Opportunity Area (OA) occupies some parts of the north east corner of the neighbourhood area and this should be illustrated clearly in the draft SNP. The OA forms an important contextual element of the SNP and the draft new London Plan sets indicative targets to deliver 300 new homes and 6,000 new jobs for the period to 2041 in Table 2.1. The OA is a result of the Tottenham Court Road underground station becoming part of the Elizabeth Line. The SNP should set out how it will positively contribute to achieving the OA indicative targets and should not put in place overly restrictive policies that would unnecessarily hinder the delivery of this growth.

The neighbourhood plan recognises and positively responds to its location within the Central Activities Zone (CAZ). However, the SNP should promote the introduction of office, culture, arts, entertainment, night-time economy, tourism development and those uses listed in paragraph 2.4.4 and in accordance with draft new London Plan Policy SD4X prior to the consideration of new homes through mixed use development. In addition, the SNP's aim should be to enhance and conserve the quality and character of predominantly residential areas, following paragraph 2.4.5 of the draft new London Plan which states that new residential development should be complementary and not compromise the strategic functions of the CAZ with special regard for other designations including those for the West End Retail and Leisure Special Policy Area (WERLSPA), Soho Special Policy Area and West End International Centre.

It is noted and welcomed that the SNP supports the new Special Policy Area designation for Soho as set out in the draft Westminster City Plan. The Mayor, in his response to the most recent Westminster City Plan consultation showed his support for the creation of the Soho SPA, and officers also welcome the neighbourhood plan's positive support for this too.

The SNP recognises that the area almost completely sits within the WERLSPA and should recognise that the area also overlaps with the West End International Centre designation. Both these designations further limit the area's ability to accommodate new residential development without compromising the strategic priorities set out earlier and this should be taken on board. In fact, the SNP should note and reinforce that residential uses in the West End International Centre are not supported in the emerging Westminster City Plan 2019-2040.

The strategic functions of the CAZ should be promoted and supported in the Soho neighbourhood area, including those for new music venues and the night-time

economy to reflect the approach set out in draft new London Plan Policy HC6, which in turn, should avoid any harmful impacts on nearby established residential areas through the agent of change principle in accordance with draft new London Plan Policy D12.

In accordance with paragraph 7.5.4 of the draft new London Plan the SNP should recognise how the cultural offer in Soho serves and plays such an important role for the LGBT+ community and should seek to protect and enhance related facilities, especially those used in the evening and night time and illustrated in the [Mayor's Cultural Infrastructure Map](#). In addition, the SNP is encouraged to promote the [Mayor's LGBTQ+ Venues Charter](#) in order to support these types of venue.

Tall buildings

Tall buildings are defined in the SNP as those substantially taller than their surroundings, but Policy 2 fails to satisfy the conditions set out in draft new London Plan Policies D6 and D8 which promote a design-led approach to optimise the development of land including the introduction of tall buildings where this type of development is considered appropriate. It is understood that the vast majority of the neighbourhood is designated as Conservation Area, but this in itself will not preclude a restriction on taller buildings being introduced into some parts of the area where they might be more appropriately accommodated, especially in areas close to excellent transport nodes, including the future Elizabeth Line station at Tottenham Court Road. The SNP should endeavour to identify specific areas suitable for taller buildings, setting appropriate threshold heights within them in line with the emerging Westminster City Plan or based on local evidence that takes into account the area's historic assets and strategic viewing corridors. The current proposed approach which essentially imposes a blanket restriction on development which substantially exceeds existing prevailing heights (in the absence of a definition) could severely limit opportunities to bring forward development and would also inhibit the operation of the presumption in favour of small housing development and this would not be supported by the Mayor.

What constitutes 'tall building' is defined in Westminster's draft City Plan 2040 as buildings greater than 30m in height, which in turn, reflects the definition set out in Policy D8 of the draft new London Plan and should be referenced and/or reinforced in the neighbourhood plan.

Other matters

While officers are strongly supportive of the SNP's intention that the Brewer and Poland Street Public car parks be earmarked for the redevelopment as micro-consolidation centres, the intention to safeguard the sites as car parks for a minimum period of five years is not supported. This approach will continue to promote and encourage car generated journeys into this part of London. Micro-consolidation centres would support the functioning of the CAZ by providing capacity for industry and logistics for last mile distribution by foot and cycle to support businesses and activities within the local area in accordance with draft new London Plan Policy SD4M. Officers strongly encourage the SNP to allocate these sites for an appropriate land use, which would include suitably sized micro-consolidation centres.

Officers welcome that the SNP intends to limit the size of dwellings to no more than 138 sqm in order to optimise the use of land for residential development which goes

beyond the limit in the emerging Westminster City Plan. The SNP is also encouraged to promote the presumption in favour of small sites development for residential uses as a means of increasing housing numbers without incurring a loss of other uses through, for example, of the conversion of larger dwellings and/or the extension of others. The SNP is encouraged to develop design codes to promote small housing site development in accordance with Policy H2AB of the draft new London Plan. The neighbourhood plan's aspiration to improve air quality is very welcome. The SNP's approach could go further in reflecting and promoting the approach in the draft new London Plan, which promotes an air quality positive approach in the CAZ in Policy SD4 and also includes measures to address the urban heat island effect and other climate change related issues.

Glossary

Affordable housing – the definition in the Mayor's Affordable Housing and Viability Supplementary Planning Guidance should be used. The current description in the glossary should be amended to include intermediate housing also. Reference to the Mayor's preferred genuinely affordable housing tenures set out in paragraphs 4.7.3-4.7.9 of the draft new London Plan is encouraged.

Central Activities Zone – the glossary should refer back to draft new London Plan Policy SD4 which defines the CAZ and its functions.

I hope you have found these comments helpful to inform the next version of the Soho Neighbourhood Plan. If you would like to discuss any comments in this letter please contact me, Hassan Ahmed, on 020 7983 4000 or at hassan.ahmed@london.gov.uk.

Regards

Hassan Ahmed

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Westminster City Council

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Westminster City Council



Westminster City Council
64 Victoria Street
London SW1E 6QP

Mr M Bennett
Soho Neighbourhood Forum
c/o House of St. Barnabas
1 Greek Street
London W1D 4NQ

Dear Matthew,

Westminster City Council response to the Soho Neighbourhood Plan Regulation 14 consultation

The council welcomes the opportunity to comment on the draft Soho Neighbourhood Plan. We hope that our comments are constructive and will help you to make the best and most effective plan possible for your area.

In general terms the plan reads well and follows a logical structure by first setting out the vision, objectives and context of the Soho area. Nevertheless, the sections containing the policies themselves could be restructured so that it is clear which parts of the justification relate to individual policies. In general, this is done by putting the relevant supporting text and justification below each individual policy. The policies themselves could be given titles to give clarity to their content.

There are several policies that repeat those in the WCC draft City Plan and/or draft London Plan. National Planning Policy Framework (NPPF) paragraph 16 states that plans should 'serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)'. It also states that plans should 'contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals'. There are some policies in the plan that require further detail or re-drafting to ensure they meet this requirement and are clear to a decision maker.

There are some policies where the justification and links to the evidence base will need to be improved. Whilst the justification as written often provides helpful facts and figures to support the policy, there are areas where it does not sufficiently link to the background evidence to justify the policy approach taken.

All maps included in the plan should contain a key in order that the reader can fully understand their content.

There are also several areas where too much detail is given on the engagement and consultation processes undertaken by the Forum and the results of these, which would be more suitably located in the accompanying consultation statement.

Further detailed comments on individual sections and policies are set out below.

Section/policy	Comment
Executive Summary	This summarises the evolution of the forum, its ideas and consultation activities but does not summarise the content of the plan itself. The content here is more appropriate for a consultation statement, especially the section on the outcome of public consultation. The Executive Summary should concentrate on summarising the content of the plan and its policies.
Paragraph 1.1	The first reference should be to the "Soho Neighbourhood Forum".
Paragraph 1.5	You may wish to explain why ideas could not be taken, namely because they did not deal with land use issues.
What does the plan contain?	This is more akin to an executive summary.
Paragraph 2.2	This should state that tall buildings will not generally be acceptable. This is linked to comments below on policies 1 & 2, where you should set out the circumstances where taller buildings may be considered, i.e. fronting the major boundary roads.
Paragraph 2.3	You may wish to expand on your reasoning for supporting private members' clubs, as outlined in more detail below in relation to policy 12.
Paragraph 2.4	Cafes are generally held to fall under A3 use class; however, coffee shops and bakeries are generally considered A1 uses. This should be clarified.
Paragraph 2.5	This will need to be reappraised given our objections to these policies (16, 17 and 18), as set out below.
Paragraph 2.6	As above, the section on protecting car parks will likely need to be altered given our objections to this policy.
Paragraph 2.7	The section concerning cycle stands in the vicinity of development will also need to be reappraised as the policy is not in conformity with the Community Infrastructure Levy (CIL) regulations. See comments below on policy 30.
Paragraph 2.9	This will need to be reconsidered as 'quiet oases' are not a recognised planning designation.
Paragraph 3.1	Neighbourhood plans cannot be shaped by visitors, but rather workers and residents who are members of the Neighbourhood Forum.
Paragraph 3.3	The original Neighbourhood Planning Regulations are from 2012, rather than 2015.
Paragraph 3.5	The new WCC City Plan 2019-40 will replace the previous iteration of the City Plan and the UDP policies. Once adopted, these older policies will cease to form part of the development plan for Westminster. This text should be redrafted to reflect this distinction.

Paragraph 3.6	The percentage levels of support during consultation should not be included here, but rather in the consultation statement.
Paragraph 3.8	Once adopted, the SNP will form part of the development plan for Westminster, which will include the WCC City Plan (the local plan) and the London Plan and any other adopted neighbourhood plans. This should be explicitly stated.
Objectives and aspirations for the plan	This section could be consolidated and summarised further with the detail of the percentage support and the detail of various surveys contained in the consultation statement.
The Neighbourhood Area – Soho Today	This section could be moved to appear before the vision, objectives and aspirations, in order to show how the context of Soho shaped these. This would allow the document to flow more logically.
Paragraph 6.1	The draft WCC City Plan no longer includes the 'Core CAZ' designation, so this reference should be removed.
Paragraph 6.7	It would be helpful to provide a data source for the approximation of 75,000 jobs here. This would further support the aims of the policy and would be a useful reference point for the reader.
Paragraph 6.13	You may wish to use a catch-all term such as anti-social behaviour to describe these issues.
Paragraph 6.14	The boundaries of the Soho Neighbourhood Area and the conservation areas covering Soho and Regent Street are not directly linked. Regent Street is within the Mayfair Neighbourhood Area.
Paragraph 7.1.1	A deficit in nature deficiency is a double negative. This should be rephrased.
Paragraph 7.1.3	Listed buildings are a type of heritage asset, so this should be clarified.
Paragraph 7.1.3	There are three protected views crossing Soho, not two.
Paragraph 7.1.4	The section on larger scale developments should link to Figure 4 to indicate these locations.
Paragraph 7.1.6	The evidence does not directly indicate what this paragraph implies. The evidence considers employment density by area but does not draw conclusions that this is due to the mix of uses or variety of sizes of commercial spaces as implied.
Paragraph 7.1.7	Rather than using the word 'bland', which could be considered subjective, it might be better to use 'uniform'.
Paragraph 7.1.10	Unsure of the use of 'potential areas of opportunity' here. If this is referring to back yards, mezz, etc. what are they areas of opportunity for?
Policies 1 & 2	These policies conflate two different issues. The first concerns local character and heritage, and the second concerns building height. Both of these issues are blended together in policies 1 and 2, leading to some contradictory elements in each policy. These issues should be clearly separated and dealt with in distinct policies.
Policy 1	This policy should separate the issues of character and heritage from that of building height, which should be dealt with in policy 2.

	Were the policy to focus on character and heritage, it should be drafted positively to ensure proposed development protects and enhances the conservation area, protects strategic views and respects local character.
	The policy could combine elements of policies 3 & 5 that focus on architectural character or features that positively contribute to the conservation area. This will add local distinctiveness to the policy and ensure it does not simply repeat wording from the Westminster City Plan.
Policy 2	This policy is not considered in conformity with the draft Westminster City Plan or the draft London Plan. Policy 42 of the draft City Plan defines tall buildings as those that are more than twice the prevailing context height, or over 30 metres tall, whichever is lower. The SNP is seeking to restrict increases in height to a maximum of two storeys in all cases. Buildings over the two storey maximum are defined as 'substantially taller than their surroundings', which the council does not agree with because it would arbitrarily restrict height increases across the area without regard to the height of existing buildings or the prevailing context height. The policy starts with a blanket statement that such proposals will not be supported, but then states that they will only be considered where they front one of the three boundary roads outlined in policy 1. No additional guidance is given on what would be considered acceptable at these locations. The policy should be reworded more positively and more accurately reflect the evidence of the prevailing context height (considered to be four storeys by the AECOM Heritage and Character Assessment). A tall building in the Soho area would therefore be around eight storeys under draft City Plan policy 42. The redrafted policy could then consider more detailed criteria for such tall buildings, including that they are sited at the edge of the neighbourhood area. The policy as drafted is overly restrictive and does not give adequate scope for individual designs to be assessed on their merits. It is not considered to contribute to the achievement of sustainable development and is not considered to be 'positively prepared'.
Policy 3	The principle of this policy is considered acceptable. As noted above, it could be subsumed into a more general policy on character and heritage.
Policy 4	This policy does not add to the draft policies of the Westminster City Plan or London Plan, where the 'agent of change' principle is clearly defined, and risks adding confusion in how to apply both policies together due to the way it is worded. A refurbishment may not require planning permission if there is no material change of use; the planning system cannot control occupiers, only uses, and a 'traditional mix' of uses (or occupiers) is impossible to define and is not positively worded. We would suggest this policy is removed.

Policy 5	The principle of this policy is considered acceptable. As noted above, it could be subsumed into a more general policy on character and heritage.
Policy 6	This policy, whilst sound in principle, contains some subjective wording such as 'bland' and 'repetitive'. It may be more appropriate to say, 'uniform shop fronts or facades that detract from local character'.
Policy 7	The policy is worded negatively as drafted and should be more positively phrased, for example the phrase 'in order to be supported' could be changed to 'proposals will be supported where...'. The policy as drafted is also currently ineffective as it does not define 'smaller commercial premises' and it is therefore impossible to measure the availability of such space. The policy is also unclear in terms of its scope. We assume it would only be applicable to major development, but the policy needs to explicitly state this. It could not apply to smaller scale commercial schemes or changes of use as it would be extremely difficult to measure the impact of such small-scale development on the wider availability of commercial and retail space in the area. It would be more appropriate to say that mixed use or commercial proposals should demonstrate that they are suitable for SMEs and other small-scale occupiers, which should be easier to measure.
Policy 8	The supporting text will need to define 'large floorplate office developments' in order to be effective. This could be done by considering square metreage of larger commercial schemes in or close to the Soho area, or alternatively by reference to a recent commercial scheme within the area. The supporting text should also more explicitly argue why these developments are only acceptable at the boundaries of the neighbourhood area. The policy as currently drafted implies that multiple occupier large office developments would be acceptable throughout the area. If this is not the case the policy should explicitly say so or omit the 'single occupier' caveat.
Policy 9	The principle of this policy is considered acceptable; however, it should say 'underused' rather than 'unused', to align with the supporting text. The policy could be more specific in requiring active frontages for commercial premises to facilitate the aims of the policy, as alluded to in the supporting text. The reference to the conservation area is somewhat odd as this is not specific to heritage concerns and we believe this should be replaced with reference to the Soho neighbourhood area. The policy could be combined with policy 6 to reinforce the issue as both relate to the design of frontages.
Paragraph 7.3.3	Soho is considered a commercial part of the CAZ and is also covered by the West End Retail and Leisure Special Policy Area (WERLSPA) and consequently arts and cultural uses in Soho are protected under policy 16 of the WCC draft City Plan.

Paragraph 7.3.8	This text would benefit from further detail on the number of existing private members' clubs and their role in networking for the creative industries in order to strengthen policy 12.
Policy 10	It is unclear what further detail this policy adds to the WCC draft City Plan policy 16 Visitor Economy. Draft policy 16 protects existing arts and cultural uses and encourages new ones within the CAZ, of which Soho is part.
Policy 11	Whilst the council supports the principle of this policy, in practice it will be very difficult to monitor and enforce, given the limited scope to control occupation under the planning system. It is unclear how the internal design of a building can be measured as providing workspace for creative industries.
Policy 12	The policy's blanket protection of all existing private members' clubs could be considered unduly restrictive as there would be no option to change the use of the building even if there were no longer an occupier. The forum may wish to consider the introduction of a marketing test to ensure that these premises do not remain vacant in the long term if they cease operating. The supporting text to the policy should be expanded to indicate the importance of existing private members' clubs to the local community, perhaps including figures on the number of clubs within the neighbourhood area. The WCC draft City Plan is largely silent on private members' clubs, although it is envisaged that proposals for new facilities will be judged as entertainment uses. If the forum wishes to encourage such uses as networking venues, it should ensure that proposals demonstrate that they will fulfil this function. Under draft City Plan policy 17 Food, drink and entertainment, entertainment uses will need to demonstrate wider benefits to the local community. It is considered that SNP policy 12 could contain more detailed criteria along similar lines to address the amenity impacts of such proposals and wider benefits to the community such as networking opportunities for nearby creative industries. This would help to bridge the gap between the policy and the supporting text.
Paragraph 7.4.1	Unclear as to what activity has moved online from the night-time economy. Do you mean gambling and sex-related uses?
Paragraph 7.4.3	Stress Areas are no longer designated in the draft WCC City Plan. Whilst they are currently within WCC licensing policy, this approach is likely to be reviewed. You may wish to revise this paragraph with this in mind.
Paragraph 7.4.6	This is considered too detailed for supporting text or justification for planning policy. Hours of operation of waste collection are a matter for planning conditions for individual proposals, based on the particular circumstances of the case; however, a more general reference to planning conditions may be acceptable.
Policy 13	As drafted, the policy differentiates between "music venues" and "(D2) live music venues". If this is deliberate, then it needs to be made clear what the distinction is and why it has been made. Whilst it is possible to protect D2 live

	music venues, those in other use classes may not be able to be protected under planning policy but may be subject to other legislative regimes such as licensing. 'Low impact' in terms of noise is difficult to define, and the policy should instead refer to the noise thresholds defined in draft City Plan policy 34 and the accompanying technical guidance note (to be published).
Paragraph 7.5.1	The reference to illegal drug and alcohol consumption could be captured by referring to anti-social behaviour.
Policy 14	This policy overlaps with policy 4 and does not add to the agent of change principle established through the draft London Plan and WCC draft City Plan. It also encompasses amenity issues that are dealt with through policies 7 and 34, among others, of the draft WCC City Plan.
Policy 15	No further comments.
Paragraph 7.6.2	This should state 'wherever possible'. Although it is an aspiration to provide off-site affordable housing close to the original site where it cannot be provided on-site, there are many reasons why this might not be possible. See also comments below.
Paragraph 7.6.5	See below comments on policy 17.
Policy 16	This policy is not considered in conformity with the draft WCC City Plan as it is overly restrictive on the council's operation as the local planning authority. The council will need to exercise its own judgment as to what the vicinity of a development site is in order to maximise the opportunity to deliver affordable housing where this cannot be provided on-site. It may also be appropriate in exceptional circumstances to provide affordable housing elsewhere in the city where this means that the amount and quality of housing can be maximised. As drafted, this policy is in direct conflict with policy 9 of the draft City Plan and should therefore be removed.
Policy 17	Policy 28 in the draft WCC City Plan provides for car free development within Soho. Policy 17 of the draft SNP also seeks to restrict the issuing of permits to new residents using legal agreements. It is not within the gift of the neighbourhood forum to determine how the council operates as a local planning authority. It is at the council's discretion which legal agreements it enters into with developers and other parties depending on the nature of individual development proposals. Policy 17 is therefore not considered in general conformity with Policy 28 of the draft WCC City Plan.
Policy 18	This policy is not considered in conformity with the London Plan, draft WCC City Plan or the national planning policy, including the nationally described space standards. The London Plan and draft WCC City Plan (policy 13C) provide for the use of the nationally described space standards as minimum standards that proposals must conform to in order to be considered acceptable.

	The forum has provided no evidence of the need to further restrict the size of housing units below the maximum contained in draft City Plan policy 8 (200sq m). The forum must provide compelling evidence of the need to do so otherwise it will not be considered in conformity with this policy. SNP Policy 18 is also a fundamental misinterpretation of the nationally described space standards. These standards are set out to provide minimum space standards for individual housing units based on the number of bedrooms and persons occupying each dwelling and the number of storeys. The 138sq m threshold is the minimum size for a 6-bedroom, 8-person, 3-storey dwelling, not a maximum limit on the size of an individual housing unit and it should not be used as such.
Paragraph 7.8.6	The reference to monitoring charges should be removed as these will need to be secured by legal agreement if appropriate to do so. If required, this will be set out in the council's own Planning Obligations Supplementary Planning Document (SPD).
Policy 19	The principle of this policy is considered sound, i.e. the wish to protect residential amenity from the adverse impacts of construction. Westminster's Code of Construction Practice (CoCP) only requires submission of a Construction Management Plan for 'Level 1' development, i.e. over 10,000sq m of commercial floorspace or 100 residential units, other than where basements are proposed. Nevertheless, where there are likely cumulative impacts, which are likely to occur in a densely developed area such as Soho, 'Level 2' development, i.e. other major development, can be upgraded to 'Level 1'. Therefore, the principle of the policy is considered in conformity with the WCC City Plan. To be effective, the policy should focus more on the overall aim, to avoid adverse impacts, rather than the tool by which to achieve the aim, the Construction Management Plan. This could be expressed simply, for example: "Major development will protect, and where possible enhance, residential amenity during the construction phase. A Construction Management Plan (CMP) will be required to demonstrate that adverse effects on residential amenity have been considered, avoided and/or mitigated".
Policy 20	This policy is currently unclear as it does not indicate the type of 'adverse effects' that will be resolved through the completion of a Delivery and Servicing Plan (DSP). As per the comment above on policy 19, policy 20 would benefit from redrafting to focus on its overall aim, which appears to be protecting amenity through reducing deliveries and servicing. The policy should again focus on the aim rather than the tool to achieve that aim.

	The aims of this policy are also adequately addressed in policy 30 of the draft WCC City Plan, which contains specific measures on delivery and servicing.
Paragraph 7.9.5	The sentence referring to wasted heat appears incomplete. Do you wish to ensure the features you identify are not provided?
Policy 21	The principle of this policy is sound, although it does not add further detail to the suite of environmental policies in the draft WCC City Plan. We therefore do not believe there is need for a Soho-specific policy on this issue.
Policy 22	As above, this policy does not add any further detail to policy 37 in the draft WCC City Plan and is therefore not required.
Policy 23	This policy as drafted is not in conformity with WCC policies on heritage or national planning policy. Retrofitting will not usually require planning consent unless it affects a heritage asset. Where this is the case, proposals must respond to the tests set out in national planning policy on harm to the heritage asset and the criteria set out in policy 40 of the draft WCC City Plan. To retain this policy, the requirement to balance the benefits of retrofitting against harm to heritage assets will need to be made more explicit. The policy could also be strengthened by requiring major development proposals to assess retrofitting options wherever possible.
Paragraph 7.10.2	The evidence justifying policy 24 will need to be specified in further detail here, including any contact the Forum has had with freight operators and landowners to ascertain the need for these facilities at the identified locations.
Paragraph 7.10.4	Further evidence that the identified locations are viable for freight consolidation will need to be provided. Furthermore, there is a contradiction between the requirement here to safeguard sites for five years and the wording of policy 24, which does not contain this timescale.
Paragraph 7.10.5	This application was granted planning permission on 31 st July 2019.
Policy 24	The council supports the principle of freight consolidation, particularly given the pressures on the road network in the West End. We therefore support the forum's ambition to encourage further sites for freight consolidation in Soho. This policy is seeking to safeguard land at two car parks for potential use for freight micro-consolidation; however, no evidence has been presented for either the need for two micro-consolidation centres in the Soho area, or whether these locations are feasible or desirable from the point of view of potential operators. It is also unclear whether the forum has consulted WCC as the feeholder of these sites. The policy is currently drafted to prevent the development of these sites rather than specifically allocating them for freight consolidation use. This is problematic and would not conform to the achievement of sustainable development. There is also a conflict with policy 28G of the draft WCC City Plan, which supports the redevelopment of car parks for alternative uses. This would not be able to happen if the sites were protected from all forms of redevelopment apart from freight consolidation.

	Further evidence will be required to demonstrate that the forum has engaged with landowners and wasted developers to ascertain the level of need for micro-consolidation facilities at these locations. In the absence of this evidence the policy is not considered to meet the 'basic conditions' set out in neighbourhood planning legislation.
Policy 25	This policy does not add additional detail to the policies in the WCC draft City Plan. The draft City Plan's policies on green infrastructure (policy 35), managing development (policy 7) and local environmental impacts (policy 34) adequately cover this issue.
Policy 26	Whilst we support the principle of this policy, it does not add additional detail to draft WCC City Plan policy 35 Green Infrastructure, which requires developers to provide green infrastructure wherever possible and gives several examples.
Policy 27	This policy covers a range of topics that are addressed in the draft WCC City Plan but does not add additional detail. The draft City Plan's policies on Flood Risk (policy 36), Walking and Cycling (policy 26), Public Realm (policy 44) and Design Principles (policy 39) all cover the issues raised in this policy. We would therefore consider that this policy is not required.
Policy 28	Whilst the principle of the policy is sound, the issue is addressed through the draft WCC City Plan policies on Walking and Cycling (policy 26) and Public Realm (policy 44), so this policy may not be required. SNP policy 28 points to adverse impacts which cannot be mitigated but neither the policy nor the supporting text explains what these impacts may be.
Policy 29	No further comment.
Policy 30	This policy is not considered to be in conformity with the draft London Plan or draft WCC City Plan cycle parking standards, which already require a minimum level of visitor cycle parking to be provided for certain types of development. The issue of securing additional cycle parking facilities in the vicinity of development through planning permission is not considered in line with national planning policy or the Community Infrastructure Levy (CIL) regulations. The council has set out that CIL will be used for such transport improvements where they are required, in line with our published Regulation 123 list.
Policy 31	This policy should be redrafted to be in conformity with policy 38 of the draft WCC City Plan, which requires all developments to provide appropriate facilities for the storage of separate waste streams. Major developments are required to provide facilities on-site, but it may not be possible for smaller scale development. A revised policy could encourage small-scale development to provide on-site facilities wherever possible.
Policy 32	This policy could be combined with policy 31 as it also deals with the issue of waste collection and storage facilities.
Policy 33	The first part of this policy is adequately dealt with by draft WCC City Plan policy 38, which requires on-site provision of waste facilities for major development.

	The requirement for further space for neighbouring smaller commercial units is acceptable in principle, but the policy should remove the restrictive requirements around 'designating' these units and requiring them to be within the boundaries of the Soho Neighbourhood Area, which will not be appropriate in all circumstances and could restrict other creative solutions to this issue nearby.
Policy 34	The issue of separating food waste from other waste streams is adequately covered by policy 38 of the draft WCC City Plan, and the draft London Plan. SNP policy 34 also seeks to encourage occupiers to use a food waste recycling service, which whilst we are supportive of, will not be possible to secure through a planning permission.
Policy 35	'Quiet oases' are not a recognised planning designation, so this policy will not be effective as drafted. It may be that proposals for public realm interventions at these two locations are highlighted as potential projects for use of the neighbourhood portion of the Community Infrastructure Levy (CIL), rather than seeking to designate them through planning policy. The provision of public seating is supported but is covered by the draft WCC City Plan policy 44 Public Realm. It is not considered necessary to repeat this policy in the neighbourhood plan.
Glossary	The definition of affordable housing must replicate the definition in the NPPF and WCC draft City Plan. The definition of CIL needs to be revised. Local communities in all designated neighbourhood areas are entitled to 15% of CIL funds for local priorities, whether or not a neighbourhood forum is in place. The definition of a conservation area should be revised in line with relevant legislation. The definition of major development should reflect the NPPF and legislative definition.

We hope that you find these comments constructive and look forward to working with you further to make sure the Soho Neighbourhood Plan is ready to undergo independent examination.

Yours sincerely,

Michael Clarkson

Michael Clarkson MRTPI

Principal Policy Officer, Westminster City Council

Historic England



Mr M Bennett
Soho Neighbourhood Forum
c/o House of St Barnabas
1 Greek Street
London W1D 4NQ

Our ref: PL00604526

By Email: info@planforsoho.org

9th September 2019

Dear Mr Bennett,

Soho Regulation 14 draft Neighbourhood Plan (July 2019)

Thank you for consulting Historic England on the Regulation 14 draft of the Soho Neighbourhood Plan. The Government, through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012), has enabled local communities to take a more proactive role in influencing how their neighbourhoods is managed. The Regulations require Historic England, as a statutory agency, be consulted on neighbourhood plans where the Neighbourhood Forum consider our interest is affected by the plan. As Historic England's remit is to advise on proposals affecting the historic environment our comments in this letter relate to the policies in the draft plan that relate to heritage. This is in the context of the National Planning Policy Framework (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life for this and future generations.

General Advice

Historic England welcomes the creation of this plan and the consideration it gives to the local character of Soho. In light of the great contribution that the historic environment makes to the character of Soho, which is recognised through the numerous heritage designations covering much of the neighbourhood area, we regret that we were not involved with the development of this neighbourhood plan at an earlier stage. Despite this, we are pleased that significant attention has been paid to Soho's heritage within the draft plan in line with the great public support that exists for it. We also welcome the evidence base that the forum has developed relating to the historic environment which supplements and updates existing studies of the area. However, we do have some detailed concerns about elements of the plan that could harm Soho's heritage, set out below, which we strongly encourage you to review.

Vision and objectives

Historic England supports much of the vision and most of the objectives of this plan in so far as they relate to heritage. In relation to the size and scale objective (paragraph 5.2) we note with concern the proposal to channel large-scale development to the boundaries of the area.



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Our experience from a number of consultations for large scale developments on the boundaries of Soho is that many are, both individually and cumulatively, harming the unique character of Soho. For this reason we are concerned that this objective will exacerbate harm to Soho's historic environment and also to the areas that surround Soho, which are also important historic places. The desire to push major development to the boundaries of a planning area does not in our view lead to good planning. We encourage the forum to consider further their approach to the boundaries of Soho, and to engage with adjacent neighbourhood forums on this issue as it will impact disproportionately on them also.

Detailed policies

The overall approach to the tight historic grain and distinctive townscape (policies 3, 5 and 6) promoted by the plan is broadly in line with the long standing policy approach taken in this area. Historic England supports this approach which, with some exceptions, has helped conserve Soho's character while allowing for significant regeneration.

In our view the approach to "substantially taller buildings" (especially in policy 2) is unclear and we cannot support the current wording. While the first three sentences of policy 2 do not give us particular concerns, the last sentence will have the effect of promoting tall buildings (of undetermined heights) on Oxford Street, Charing Cross Road and Shaftesbury Avenue as we read it. It is uncertain what "substantially taller" means in this plan. Is it anything more than two storeys above the four storeys plus mansard identified in paragraph 7.1.2.2? Or, is it in line with the definition of a tall building in the City Plan (2016) referred to in the neighbourhood plan glossary "a building significantly taller than its surroundings". Given that some of the buildings in and around Soho that are already larger than five storeys, it would be possible to interpret the plan as encouraging buildings significantly taller than those buildings e.g. supportive of a 16 storey buildings in an area where the context is predominantly 8 storey buildings.

In addition to being concerned about the policy wording we can find no evidence that demonstrates that the potential impacts of this approach to promoting "substantially taller" buildings have been tested. In our view it seems likely that the final sentence of policy 2 could impact negatively on the many heritage assets that line Oxford Street, Charing Cross Road and Shaftesbury Avenue, and those streets surrounding them. Such impacts are also likely to affect the overall character of this and neighbouring conservation areas, and the three strategic views that cross the neighbourhood area, and may not accord with the statutory duties relating to listed buildings and conservation areas.

Furthermore, we are not convinced by the assertion in 7.1.4 that because there are a number of larger buildings on the roads that form the boundaries to Soho, that further "large-scale development can sit more comfortably in these locations" or that existing buildings create a sufficient transition or buffer zone that new large scale development would "not risk



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undermining the overall character of the conservation area itself." In our view the character areas defined in the AECOM heritage report do not support this policy approach, which seems to apply a singular character to three of the boundaries of Soho despite them having diverse characters. Likewise, our experience of numerous large scale developments on the edges of Soho over the recent years is that these are harming the conservation area and the setting of numerous other heritage assets.

We also note that figure 4, which relates to policy 8, also encourages large scale redevelopment of sites without evident regard to potential heritage impacts. For example it suggests that the large scale office development may be permitted on the site of the Grade II* Palace Theatre on Cambridge Circus. Such a proposal is likely to be highly controversial. As with policy 2 we are concerned about the way that policy 8 has been developed, and the potentially negative impacts it will have on designated heritage assets.

In our view the scale of change envisaged and promoted by policies 2 and 8 have the potential to lead to significant environmental effects that would trigger the need for Strategic Environmental Assessment. Given the existing policy framework that the Neighbourhood Plan will be set within, we are not convinced that these effects will have been tested in previous environmental assessments. For these reasons, while we note that the environmental impacts would depend on the schemes that might finally come forward, we are likely to advise that this plan would require SEA when we are consulted on this.

Historic England considers the SEA process important as a means of identifying potential harm to heritage assets as well as alternatives or options that reduce or minimise harm and, where necessary, whether policy, direction or guidance is required within the plan to mitigate potential harm or to secure benefits including promoting the conservation or appreciation of heritage assets. However, we also note that SEA should not require additional evidence gathering beyond that already required for the robust preparation of a neighbourhood plan and that it should be limited to those areas where likely significant environmental effects are expected.

On an editorial note we would draw your attention to the following points in the draft plan:

- Paragraph 7.1.3 suggests there are two strategic viewing corridors that cross Soho, but it would appear from figure 3 that there are three.
- Figure 4 is misleading as it only illustrates 4 of Soho's hundreds of listed buildings.

Evidence base
In our view The Soho Heritage and Character Assessment (August 2018) which supports elements of the plan is a helpful document. When you review the plan prior to submission we would encourage you to explore some of the guidance that Historic England has produced for Neighbourhood Forums to support the development of Neighbourhood Plans. This



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includes our [Historic England Advice Note 11 Neighbourhood Planning and the Historic Environment](#) (October 2018) and other [supporting materials](#) which can all be found on our website.

We would also draw your attention to a further heritage designation not highlighted by the plan or the AECOM report. Soho has been identified as being a Tier 2 archaeological priority area: <https://historicengland.org.uk/content/development/planning/psa-a-city-of-westminster.pdf/>. For further information on this you are encouraged to contact the Greater London Archaeological Advisory Service.

Conclusion

We hope that these comments are helpful and would welcome the opportunity of discussing them with you further. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from this Neighbourhood Plan, and which may have adverse effects on the environment. We trust this advice is of assistance in the preparation of your Plan.

Yours sincerely,

David English
Development Advice Team Leader London
E-mail: david.english@HistoricEngland.org.uk
Direct Dial: 020 7973 3747

cc: Diane Abrams Greater London Archaeological Advisory Service



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Shaftesbury

Shaftesbury Soho

Soho Neighbourhood Plan Consultation
Soho Neighbourhood Forum

By email to: [Matthew Bennett - matthewbennett27@btinternet.com](mailto:Matthew.Bennett27@btinternet.com)

Dear Sir/Madam,

Introduction

Shaftesbury is a Real Estate Investment Trust which invests exclusively in the heart of the West End. Our portfolio extends to 15.1 acres, focussed on Soho and Covent Garden incorporating the internationally recognised locations of Carnaby, Chinatown and Seven Dials. Assembled over 33 years, the portfolio provides accommodation for c.600 shops, restaurants, cafes, pubs and bars, across 1.1 million sq. ft., which provide two-thirds of our rental income. In addition, the upper floors of our buildings comprise 0.5 million sq. ft. of SME office accommodation and c.600 rental apartments. We estimate the average age of our buildings is c.150 years and some 20% are listed.

Our strategy is based on long-term ownership, investment and active management with the goal of curating safe, attractive, vibrant and sustainable environments. Our buildings and locations make an important contribution to the historic heart of the West End and its global reputation as a shopping, entertainment, culture and visitor destination, as well as a high-profile commercial hub. We recognise the importance of the local residential community to the authentic feel of the West End and work closely with it to address the challenges of an intensively-used urban environment.

We have a long record of partnering with Westminster City Council on public realm investment and management projects and initiatives to enhance these areas for those that live here and to create a more enjoyable experience for the millions who visit our locations, whether they are here for work or leisure.

Representations in the draft Soho Neighbourhood Plan

Our representations on the draft Neighbourhood Plan are set out in the tabulated appendix attached to this letter.

A positive policy regime is essential to the ongoing success of the West End and the health of our portfolio. Continuity of planning policy and its application are essential to business planning.

The plan as drafted contains a number of aspirational policies that we support wholeheartedly, however some aspects of it are a little too 'prescriptive' and our response has a mixture of comments and proposed drafting that we hope you will find helpful. The new draft City Plan recently prepared by Westminster City Council has taken the approach that it is to serve as a 'start of the conversation' with contextual approaches to development. We broadly welcome this approach to planning, as highlighted within our own portfolio of 'villages', each one is unique with its own character and heritage, culture, community, economy, strengths and challenges, reflecting many aspects of Westminster as a whole. We consider that the Soho Neighbourhood should adopt a similar approach and should seek to reflect and build upon the aspirations of the City Plan.

Our areas have benefited from, and will be future-proofed, by facilitating flexibility to adapt the use of buildings to the changing retail environment and consumer spending patterns, to the changing demands of office occupiers to provide appropriate accommodation across the range of uses. This flexibility has underpinned the economic sustainability of buildings for generations as uses have ebbed and flowed.

Conclusion

We welcome the opportunity to continue a constructive dialogue over the evolution of the draft Neighbourhood plan and hope our comments, borne out of our practical experience, will make a valuable contribution to the consultation process. Should you wish to discuss our response in more detail please do not hesitate to get in touch.

Yours faithfully

Andrew Price
Portfolio Executive

Clean Air London

London Plan Examination in Public

Matter 74 Air Quality and Water Infrastructure

Clean Air in London (3143)

1. Clean Air in London (CAL) wishes to record its appreciation to the Planning Inspector for allowing us to give oral evidence on this Matter on 9 May 2019 and submit proposals for changes to policy wording to address points made by CAL and others during the oral hearing.
2. As CAL said, there is no need for more evidence, only clearer policy wording. Furthermore, as the capstone policy on 'air', 'Policy S11: Improving air quality' must take a lead and responsibility for cutting the 'Gordian Knot' of air, energy and climate policies in relation to end points for 'air'. No end date to achieve zero air emissions is required if it is recognised to be between 2030 and 2040.
3. CAL is willing to substantiate any of its statements at the oral hearing. We propose changes to the Mayor's written statement made on Matter 74 are highlighted in **bold and yellow** below:

London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced:

A 4) D4) Development plans and proposals, including substantial refurbishment schemes requiring planning permission, should aim to achieve zero local emissions and should not:

- a) lead to further deterioration of existing poor air quality
- b) recreate any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits
- c) reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality
- d) create unacceptable risk of high levels of exposure to poor air quality.

B 2) D4) Development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality. Particular care should be taken with developments that are in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people.

C 2) The development of large-scale redevelopment areas, such as Opportunity Areas and masterplans and development briefs for large-scale development proposals, should be subject to an environmental impact assessment that proposes methods of achieving an Air Quality Positive approach through the new development... all other developments should be at least Air Quality Neutral.

D 3A) major or larger development proposals must aim to achieve zero local emissions and demonstrate that they would be at least air quality neutral positive and be submitted with an Air Quality Assessment.

E 4) Development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance 115.

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S1-Air Quality Assessments (AQAs) should be submitted with all major developments, unless they can demonstrate that transport and building emissions will be less than the previous or existing use.

F 6) Development proposals should ensure that where emissions need to be reduced, this is done on-site. Where it can be demonstrated that on-site provision is impractical or inappropriate, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated.

4. CAL recommends adding a clause to remove unnecessary barriers to unpolluted air:

Development seeking to comply with sustainability standards or building regulations must not do so at the expense of air quality. Wherever practical, development should seek to minimise energy use and then maximise electricity use over other forms of energy required.

5. CAL recommends adding the clause on indoor air quality from the 'made' Knightsbridge Neighbourhood Plan (Policy KBR34: Healthy air):

Major development must demonstrate that it is designed to ensure that indoor air quality complies with the latest World Health Organisation guidelines for short and long term air quality including particulate matter (PM_{2.5} and PM₁₀), nitrogen dioxide (NO₂), carbon monoxide (CO), formaldehyde and volatile organic compounds (VOCs). Carbon dioxide concentrations in indoor air should also be considered. Compliance with such standards is also encouraged on medium development and substantial refurbishment schemes.

6. In its glossary, the Knightsbridge Neighbourhood Plan defines:

Renewable energy – any naturally occurring, theoretically inexhaustible source of energy, such as solar, wind, tidal, wave or hydroelectric power, which is not derived from fossil or nuclear fuel. It excludes biomass burning, combined heat and power plants, diesel generators and gas boilers.

Zero local emissions – development that emits no emissions to air within [Greater London] other than filtered air after ventilation or cooking. Where possible and in any event by the end of the Plan period it should use only 100% renewable energy.

Zero total emissions – development that emits no emissions to air directly or indirectly other than filtered air after ventilation or cooking and that uses only 100% renewable energy.

7. Please add the following statement in the reasoned justification:

Development plans under this policy are to be produced in pursuance and recognition of the duties of public authorities to protect human rights under Article 2 of the ECHR (the right to life) and Article 8 (Right to respect for private and family life and home) and the human right to breathe clean air.

8. Please note that Simon Birkett is Chair of the Knightsbridge Neighbourhood Forum which produced the only 'made' neighbourhood plan in the City of Westminster.

Simon Birkett
Founder and Director of Clean Air in London
13 May 2019

Clean Air in London is a company limited by guarantee, registered in England and Wales, with company number 7413789 and registered office Thames House, Mere Park, Dedmere Road, Marlow, Bucks SL7 1PB

Environment Agency

Dear Anna

Thank you for consulting the Environment Agency on the draft Soho Neighbourhood Plan. We are a statutory consultee in the planning process providing advice to Local Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans.

We aim to reduce flood risk, while protecting and enhancing the water environment. However, we have had to focus our detailed engagement to those areas where the environmental risks are greatest.

Based on the environmental constraints within the area, we have no detailed comments to make in relation to your Plan at this stage. However together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf

We hope that you find this information helpful. Please contact us if you have any questions.

Kind regards,

Demetry Lyons

Planning Advisor | Sustainable Places | North London

Environment Agency | 2 Marsham Street London SW1P 4DF

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Monmouth Planning

We act for numerous restaurants in Soho respond to the formal consultation of the Soho Neighbourhood Plan and set out below our further feedback on the consultation version of the Soho Neighbourhood Plan dated July 2019.

We are encouraged by some of the Plan's objectives. However, in our view it would be improved by applying the following amendments.

The Plan should acknowledge the significant positive contribution the evening and night-time economy brings to Soho, and that the wide variety of entertainment uses are to the benefit of the both residents and visitors to the area.

Paragraph 4.2 – The vision set out here needs to further emphasise that Soho is a world renowned neighbourhood which encourages creativity, diversity and tolerance and should be seen as an inspiration to the rest of London and the World in the management of residential, commercial, cultural and entertainment, uses alongside one another.

The Plan fails to identify that residents also make use of the entertainment facilities in Soho and that it is not just visitors and those who work in the local area. As such Paragraph 6.8 should be amended to include reference to residents, workers and visitors.

Paragraph 6.11 should include a statement that: *“commercial/entertainment tenants should work with local residential neighbours to ensure any amenity impacts in terms of noise and disturbance are dealt with accordingly and agree on measures that could be proposed to address any noise complaints”. There should be ongoing discussions and liaison between residential and commercial/entertainment tenants.*

Because each country, city (and indeed neighbourhood) is unique, there is no internationally agreed definition of the evening or night-time economies. The Mayor has a vision for a 24-hour London and the London Night-time Commission concluded that 'night' was from 6pm to 6am. Our view is that that Soho plan should reflect the reality of the neighbourhood, which is that the evening economy comprises later working office staff, networking, socialising, eating, drinking, gym and sports facilities as well as the arts such as, music, cinema and theatre, currently operates until 1am. From 1am activities are more limited, and Soho becomes a night-time economy with greater emphasis on drinking and socialising with some ongoing provision for music, dancing and food. Whilst it is important that both evening and particularly night-time economy uses are well-regulated and consistent with preserving local amenity, the plan should still encourage appropriate new uses from 1am to the early morning hours.

As such, paragraph 6.13 should be amended to differentiate between the evening and night-time economy and remove the reference to 'late-night economy': *“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 continues after 1am to become a late-night-NIGHT-TIME economy, which can raise problematic elements for residents and some neighbours with an increasing emphasis on the consumption of alcohol and drug taking.”*

The Plan should also emphasise that many visitors to the area visit Soho much later in the evening to visit late-night clubs, bars and live-music venues as such post-midnight the majority of visitors to the area have

not consumed high levels of alcohol and do not cause a nuisance to the local area. During this time the area is generally characterised as being friendly and safe and a fun area to be in.

The Plan seeks to encourage and promote "Soho as a unique cultural and entertainment area for future generations" yet fails to include this recognition with the preceding policies. Policy 4 should be amended to include the provision of well managed and unique cultural and entertainment uses. Policy 4 should be amended as follows: *“Proposals for mixed use development, and which retain a traditional mix of occupiers (such as retail light industrial, office, residential, traditional public houses and live music venues) and should apply the 'agent of change' principle as defined in the London Plan will be supported.*

Paragraph 7.1.9 should be amended as follows: "Suitable business sectors and activities that might fit with this policy include but are not limited to:

- A diverse range of independently branded restaurants [NB surely branded is antithetical to independent?] ...

There is no mention at paragraph 7.4.4 for the support of the night-time economy and as currently worded this part of the plan does not align with the new City Plan Soho SPA which encourages "New live music venues with low amenity impacts".

Paragraph 7.4.4 should therefore be amended as follows: "The Plan is supportive of the growth in entertainment and live music uses and will support the provision of such uses, where a robust Operational Management Plan is submitted as part of the planning application and the use is music focused with alcohol served as an ancillary element and allows for a late night opening/night-time opening."

It is disappointing to see that the Plan fails to include policies which seek to support well managed entertainment uses such as independent A3 uses, traditional public houses and live music venue or small bars.

A policy should be inserted at page 29 as follows: *New entertainment uses (independent A3 use, traditional public houses and live music venue, or small bars) will be supported where they provide for an active street frontage and demonstrate that they will be low impact in terms of noise and disturbance through the provision of a detailed operational management plan.*

Paragraph 7.5.6 is not precise or accurate and should omit: 'drink related establishment increases' as there is evidence from The City Council which demonstrates that the number of drink establishments has fallen in Soho to be replaced with food establishments and in some cases retail.

Glossary

For completeness, in terms of 'entertainment uses the Glossary should also include sui generis uses such as nightclubs, mixed use A1, A3, A4, A5 and multipurpose spaces. The definition should be amended as follows: *These may be business uses classified in planning terms as A1 cafes, A3, A4, A5 and D2 and mixed entertainment uses, music venues, clubs and multipurpose spaces with a mix of A1, A3, A4, A5 or music uses.*

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Overall the plan should

- Recognise that new entertainment uses such as A3, A4 and live music venue uses can create active frontages and should be encouraged where they do not harm local amenity, as assessed through the provision of an operational management plan.
- Recognise that (by way of examples) an acoustically controlled live music venue; premium restaurant; or a well-managed community public house are not the type of premises that would realistically be associated with serious nuisance and disorder. In fact, the introduction of these types of quality uses can bring about positive change in an area and draw the community together where the standard of existing entertainment uses has fallen.
- Recognise - in line with both the Mayor's desire (as expressed in the Agent of Change principle contained within the Draft London Plan) and Agent of Change legislation within paragraph 182 of the National Planning Policy Framework 2 - that existing businesses and community facilities (including pubs, live music and entertainment venues) should be protected from new or redeveloped residential developments.

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Knightsbridge Neighbourhood Forum



Knowledge note – Version 1.0 on 6 June 2019

Our journey to the first 'made' neighbourhood plan in the City of Westminster

The purpose of this 'Knowledge Note' is to explain the process that the Knightsbridge Neighbourhood Forum (KNF) followed to achieve the first 'made' neighbourhood plan in the City of Westminster. We hope that by doing so we will encourage other Forums in Westminster and elsewhere to progress their plans to a successful conclusion. The process took us three to four years with a number of 'ups' and 'downs' along the way. We're pleased we did it! Please see the 'Timeline' in the Appendix for details and any guidance on process published by Westminster City Council (WCC).

Designation twice and governance (six to nine months or more)

The Knightsbridge Neighbourhood Area (KNA) was designated as a "neighbourhood area" which was not a "business area" pursuant to sections 6(1) and 6(1H) of the Town and Country Planning Act 1990 by WCC on 27 March 2014. The KNF applied to be designated as a "neighbourhood forum" pursuant to Regulation 9 of The Neighbourhood Planning (General) Regulations 2012 in March 2015 and was designated pursuant to section 6(1G)(2)(b) of the Town and Country Planning Act 1990 by WCC on 21 July 2015 with an exclusive mandate for five years to produce a neighbourhood plan. In order to ensure a solid foundation, we created a company limited by guarantee with a quorum for board meetings requiring two resident directors, one business director and one cultural director. This approach ensured that business and institutional stakeholders, who would not be able to vote in the Referendum, would be represented and involved at the heart of our planning.

Our task and options were simplified by: WCC not allowing cross-border forums (as others have achieved after great efforts) and designating the KNA as a neighbourhood area which is not a business area; not 'allocating' sites; and having direct and full alignment with one strong amenity society and group of three councillors. We also had a highly motivated and experienced group of people involved who knew the local community and issues, adequate funding; outstanding (not the most expensive) advisers; and an opportunity/urgent need to shape the future of the Hyde Park Barracks, if it is developed. A key motivation was to share these advantages by writing policies and documenting the process so that others in Westminster and beyond could benefit from or build upon our work – provided that they tailor it fully to the specific opportunities and challenges in their local area.

The KNF appointed professional advisers in 2015 including Field Seymour Parkes as solicitors, Webbery as accountants, IRISC as bankers, Ivy to build a website and Chris Bowden of Nishobus Planning as planning consultant. Kate Harrison of Harrison Grant Solicitors was appointed in 2017 to provide legal advice on the progress of the neighbourhood planning. A core team of three directors held mainly weekly conference calls throughout the process.

Foundations (six to 12 months or more before Pre-Submission (Regulation 14) consultation)

Following designation, we activated the legal entity and held our first KNF board meeting in September 2015. We then applied for government grants from Locality and set up our website: knightsbridgeforum.org.

We recognised that we needed to identify the key issues and objectives for our neighbourhood plan well before starting work on drafting it.

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reading it: <https://www.gov.uk/guidance/neighbourhood-planning-2>. It is also important to read WCC's City Plan policies carefully and understand which policies are 'strategic' and which already address a local issue satisfactorily. The new City Plan should specify which policies and their components are 'strategic' to help forums understand what they need to be in 'general conformity' with. All policies in the London Plan are considered 'strategic'. If an issue has sufficient policy coverage in the City Plan or London Plan there is no need to produce a neighbourhood plan policy that duplicates it.

Having tested our proposals thoroughly and read the official guidance, we spent two months producing the first draft of our plan (July and August 2016). We shared this '250 page' draft with stakeholder organisations and arranged a preliminary health check through NPIERS with Christopher Lockhart-Mummary QC (CLM). We agreed with WCC that they would provide initial comments on our plan within six weeks of receiving it. We opted for the maximum '20 year' plan, not finding a strong reason for a shorter timescale, and should have allowed for the length of the approval process i.e. 2028 not 2037. Other forums may wish to align their neighbour plan's time period with that of the City Plan.

We found the preliminary health check valuable because we had no precedents to follow but it took a few weeks to complete. It may not be necessary for other forums if they consult WCC, obtain good neighbourhood planning advice and follow official guidance.

Our preliminary health check resulted in the first of two serious setbacks and delays. We received strong advice from WCC and CLM that we should split our document into three separate documents:

Knightsbridge Neighbourhood Plan (KNP)	'Land use' policies that would be subject to Examination and Referendum and would form part of the statutory development plan which must be considered in determining an application for planning permission.
Knightsbridge Evidence Base Document (KEBD)	Document supporting KNP and referenced.
Knightsbridge Management Plan (KMP)	Community priorities that were not deemed land use and could not be included in the KNP but reflected the additional steps that the KNF and local residents wanted to pursue to improve the KNA outside the planning process.

WCC sent comments in a long letter attaching a '20 page' table with strategic and specific comments on every part of our plan. These comments seemed a little daunting at first read! Others may wish to 'test' more ambitiously than we did the definition and scope of 'land use' policies and what can lawfully be included in neighbourhood plan policies and/or elsewhere in the neighbourhood plan e.g. transport policies. We would caution other forums however since pursuing non-land use policies (i.e. policies that cannot be determined by planning applications) could add unnecessary complexity or time to the process only for such matters to be recommended for removal by WCC and/or an independent examiner.

Most of WCC's advice was good though it must be recognised that they (and we) were both finding our way with no precedents to follow. In retrospect, it would be most helpful to have had comments from WCC that were split between: red lines ('must have' strategic or big picture points such as the 'need' to allow new housing on the Hyde Park Barracks site), yellow ('important' such as a request to include references relevant City Plan or London Plan policies alongside KNP policy wording); or green ('nice to have' such as the ordering of policy wording before reasoned justification). Other improvements might include constructive recommendations for addressing gaps or problems in the plan (which might be done at a meeting). WCC asked the KNF to include maps but omit most pictures from the KNP.

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The 'skeleton' of our neighbourhood plan was created and tested in two main stages. These were two public events where large A1 size display boards were used to test our initial research and priorities. Each event took several weeks to organise and publicise; needed signage, signs-in sheets, a large room or space with chairs and at least one table (say 10 metres by 10 metres), and required three or four forum directors or advisers in attendance to answer questions. We encouraged people to say whether they agreed with our priorities or wished to add others. This phase was helped by being able to see Mayfair Neighbourhood Forum's early work, published online.

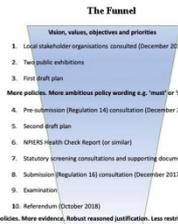
Our 'Top 75' priorities, more or less, comprised:

Vision	Make Knightsbridge the best residential and cultural place in London in which to live, work, study and visit.
Values	Community, conserving, clean safe and quiet, iconic, inspiration and international.
Themes	Character, community, culture and education, public spaces and utilities and healthy environment and healthy people
Objectives	We identified 10 objectives under the five themes.
Outcomes	50 initial policy priorities were eventually whittled down to 40 planning policies.

We also tested 10 priorities for neighbourhood management and about eight each for principles and specific projects for Community Infrastructure Levy or other spending.

Broadly speaking, we pursued issues or priorities that carried 90% or greater support at each consultation stage. Some needed clarification before achieving it. After nearly a year's local consultation, we fixed the skeleton or shape of our neighbourhood plan and did not change it subsequently.

This process is described in our Consultation Statement which was one of eight documents submitted. It is most simply described by 'The Funnel'.



Having developed the 'skeleton', we re-read carefully, the government's guidance on neighbourhood planning which was immensely valuable. Do not waste time working on a plan without reading and re-

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We accepted most of the advice from WCC and CLM quickly but took great care to use consistent formatting and numbering between the three documents to make them as easy to read and clear to follow as possible. In retrospect, we were wise to follow the above approach and create a plan on firm foundations with a flexible and robust structure or shape that we were able to stick with right through to referendum. For example, it helped to have consistent headings organised around our 10 objectives and numbered paragraphs.

We had conflicting advice about whether we were allowed to include an 'Executive Summary' at the start of our KNP but decided to include it and found it valuable at all subsequent stages.

It is worth bearing in mind that all your correspondence to and from WCC may appear in court as seems to have happened during the judicial review of the St Quentin & Woodlands Neighbourhood Plan. We found it extremely valuable to get professional advice and WCC's input before the Pre-submission consultation because it kept us within 'The Funnel' and may have avoided the need to repeat stages.

Pre-submission (Regulation 14) consultation – 8 December 2016 to 15 February 2017

This consultation was a valuable opportunity to test the forum's detailed KNP and supporting documents. It is a statutory public consultation for a minimum six weeks, subject to strict rules, and must include consulting a number of statutory consultees e.g. Environment Agency, Historic England, Natural England and WCC. There is excellent government guidance on the requirements.

We continued to follow the Funnel approach by including policies and stronger wording (e.g. 'shall', 'must' or 'require' in policy wording) in the first KNP and KMP to encourage clear feedback while maintaining the option to remove or weaken it later. In general, it is relatively easier to remove policies or weaken wording up to the Regulation 16 consultation and possible thereafter but likely to be difficult to strengthen wording or add a wholly new Policy because it could raise questions about the consultation process, or worse, result in statutory consultees legitimately changing their opinion or conclusion about your plan. Our main obligation is to be in 'general conformity' with strategic policies in the statutory development plan (which for the KNA meant being in general conformity with WCC's City Plan and the London Plan). Unlike the City Plan, there are less onerous 'soundness' or 'evidence' requirements but we provided lots of evidence. In principle, the more ambitious, more restrictive the policy wording, the more evidence will be required including testing of the policy's 'viability'. This is important.

The Government's National Planning and Policy Framework requires plan makers to consider 'viability' and 'deliverability'. In practice, this means that the sites and scale of development identified in a plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. The issues are more complicated if a plan 'allocates' one or more sites.

These documents were posted on our website, emailed widely and highlighted at local meetings and events. We encouraged responses and received about 50 – split equally between residents and organisations. The process and results are described in our Consultation Statement.

'Screening' the report including environmental effects with statutory consultees – February to October 2017 (six to 12 months or more after Regulation 14 consultation)

We analysed all the responses to our pre-submission consultation and revised our plan into near final shape. This process is likely to take at least two to three months with several more months needed to allow for holiday periods and subsequent statutory consultations.

We then consulted WCC again (six weeks) and arranged a formal health check with NPIERS (one to two months). This was the second and final time that WCC was willing to comment on our plan outside the two formal consultation stages. We asked NPIERS for someone with experience of legal, design,

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environmental, policy and viability matters and were fortunate to get CLM again. His advice allowed us to fine tune our plan and drop one or two policies (because we felt they added little) and present our transport policies more logically. We found the NPER2 process efficient and viable.

At this stage we felt reasonably confident that plan was largely complete and met the legal requirements. In particular, we felt that each of our policies had a clear 'end point' in mind and 'allowed' developer to get there now (e.g. zero air emissions electric buildings) and 'encouraged' them to do so over the '20 year' life of the plan. We also decided to align every one of our policies with one or more of the United Nations Sustainable Development Goals in Agenda 2030. By nudging development along this path, we felt we were not imposing unviable or undeliverable requirements and were pointing to true sustainability in our area by 2037.

Our second serious setback arose because WCC and we seemed to be going around in ever decreasing and increasing circles, for nearly nine months, about the need for the KNF to undertake a Strategic Environmental Assessment, Habitats Regulations Assessment and/or Sustainability Appraisal for the KNF. This was exacerbated by the lack of established local precedent. WCC expected the KNF, not the council, to produce such documents in support of the KNF.

In the end the Forum appointed Kate Harrison, of Harrison Grant Solicitors, to advise us on these matters. Kate quickly cut through the issues and the Forum produced:

- i. Strategic Environmental Assessment screening report
- ii. Habitats Regulation Assessment screening report
- iii. Sustainability Report i.e. not a Sustainability Appraisal

We found that no policy, individually or cumulatively, would have significant positive or negative effects on the environment after amending one or two policies. We decided that a 'Sustainability Report' was a proportionate means to assess the KNF without undertaking the separate further consultation, with statutory consultees, that a formal 'Sustainability Appraisal' would require. This was a good decision for us.

We were required to consult the Environment Agency, Historic England, Natural England and WCC on (i) and (iii) and Natural England and WCC on (i) and (ii) for a statutory five weeks. This was another valuable part of the process. Highlights included: the Environment Agency pointing out that the KNA includes a groundwater source protection zone; Historic England pointing out that we had wrongly (and needlessly) weakened our 'Tall buildings' policy by allowing up to 'significant adverse' impacts; and Natural England pointing us to 'Greenspace information for Greater London' (GGL) who produced an amazingly detailed report about the local natural environment.

By this time, the KNF and supporting documents were firming up. We needed to produce two other documents for submission which were: (i) a 'Basic Conditions Statement' to demonstrate that the KNF met the legal requirements for making a neighbourhood plan; and (ii) a Consultation Statement to explain the consultation undertaken and to summarise how the consultation responses have been taken into account. WCC confirmed 'no objection' to a draft 'Basic Conditions Statement'.

At this stage, as the KNF prepared to submit its plan, the Forum accepted that it would lose the unilateral right to change the KNF or supporting documents. Subsequent changes could only be made with the agreement of WCC, the Examiner or both (and possibly others if further consultation is required). It was important therefore to feel comfortable with the plan, confident that it met the legal requirements and to understand that the Examiner may not allow the forum to propose or make any further changes to the submitted plan. We may have over-engineered the plan and provided more supporting material than strictly required, though it is unclear in which areas, but we were keen not to miss anything and

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The KNF asked the Examiner whether it could respond to the 99 consultation responses which was allowed. We tabulated our responses to each comment and proposed small changes to the KNF to address them.

WCC asked them to comment on our responses. The Examiner approved this approach and invited the Forum and WCC to agree a 'Statement of Common Ground' (which had not been done before by WCC). The Forum and WCC embraced this approach which turned out to be highly productive.

Over several weeks, WCC proposed highly constructive feedback to the KNF such as changing the 'Neighbourhood Stress Area' policy to deliver similar policy outcomes within the already defined 'International Shopping Centre'. In some ways it would have been nice if that happened earlier but it is understandable that 'final agreement' takes place at the very end when all the work has been done and evidence is available. The KNF recommends that both sides recognise the Funnel approach, with its strengths and weaknesses, including some inbuilt (constructive) conflict between a forum and WCC.

The KNF was willing to lose a 'hand' and/or 'leg' of the KNF at this stage to keep the project on track. We did that because we recognised that the Examiner could, inter alia, conclude that the KNF did not meet the 'basic conditions' and/or might rule in WCC's favour on important points. By agreeing changes with WCC, within the legal requirements of neighbourhood planning, the Forum and WCC were able to minimise the uncertainty inevitable by leaving important, perhaps vital issues, to the Examiner to 'adjudicate' upon.

Key items which we accepted included: dropping one policy; agreeing to move four appendices to 'Best practice guidance' published on the Forum's website provided that each was addressed directly in the KNF and correcting or weakening some policy wording e.g. to make the policy less onerous or less prescriptive. WCC also made concessions.

This approach was so successful that the Forum and WCC 'agreed' everything other than six 'second order' matters in the SOCG. These were matters which were either small points of principle (e.g. what were saved policies), important differences of opinion or approach (e.g. the Forum wanted the Tall buildings policy to be 'half full' whereas WCC wanted it to be 'half empty') or on technical matters (e.g. the interpretation of air quality law).

This work meant that the issues were highly focused for the Examiner. The Examiner, of course, has to judge everything but we were pleased that Ms Kingly largely approved wording agreed between the KNF and WCC. Please remember that the Examiner has wide powers to accept or reject proposals.

Throughout, we knew that the Examiner's final report could recommend that the KNF proceed to referendum unchanged; proceed with specified changes; or cannot proceed to referendum e.g. because it does not meet the Basic Conditions. The Examiner also proposes the area for the referendum.

The Examiner sent WCC and the Forum a final draft of her report for fact checking. We were warned properly that other comments would not be accepted. The final report was dated 10 July 2018.

WCC was required by law to accept or reject the recommendations in the Examiner's report within five weeks. It accepted the report on 21 August 2018 and decided subsequently on the referendum date. Regrettably, there is no fixed timescale for the referendum in statute or national guidance. However, WCC acted expeditiously and agreed an early date with the KNF and found an excellent venue for the Polling Station.

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had no precedents to follow. We were fortunate to have Harrison Grant 'legalising' key parts of the KNF to ensure, as best as we could, that it met the strict legal requirements including 'Basic Conditions'.

Again, we followed the Funnel approach and included two policies and other proposals that WCC did not seem willing to accept. 'View north along Montpellier Street' and 'Sustainable development and involving people', four appendices (Knightsbridge construction standards and procedures, Tree Management Plans, Knightsbridge Community Engagement Protocol and Scales of development) and stronger wording in several policies. This was a carefully judged but good decision for us.

Submission/Examination (Regulation 16) consultation: 20 December 2017 – 14 February 2018

We submitted our package of documents to WCC on 22 November 2017. They became responsible then for the cost and organisation of the Submission (Regulation 16) consultation. This was posted on their website and ours immediately thereafter and ran from 20 December 2017 to 14 February 2018 (which allowed extra time for holidays).

WCC consulted on all eight submitted documents. These were:

1. Knightsbridge Neighbourhood Plan
2. Knightsbridge Evidence Base Document
3. Knightsbridge Management Plan
4. Basic Conditions Statement
5. Consultation Statement
6. HRA Screening Report
7. SEA Screening Report
8. Sustainability Report

Our Basic Conditions Statement included an 'area statement' confirming the designation of the KNA.

In addition to WCC consulting those we had consulted at Regulation 14 stage, including statutory consultees, the Forum encouraged a wide range of responses. As well as posting the documents on our website, we leafleted every local household and business, spoke at events and emailed the consultation information to others.

WCC received nearly 100 responses (99) with about half from residents and half from organisations. About 90% of these were supportive including many business organisations supporting our approach on 'Healthy air' and 'Renewable energy'.

It is important to recognise that the neighbourhood plan begins to take significantly greater and increasing weight in planning decisions in the neighbourhood area at the end of this stage. In essence, the weight of a draft policy will be dependent on the stage of consultation and whether there are significant objections to the policy i.e. until the outcome of the examination is known.

Examination (four to six months or more)

WCC and the KNF were required to agree on the choice of Examiner. The KNF insisted on someone with experience of neighbourhood planning and London. We were lucky to get Ms Jill Kingly BSc (Econ) MSc MRPI, of Intelligent Plans and Examinations (IPE) Ltd, who was fair to us (and WCC) and highly professional. Correspondence was published online to ensure transparency. The Examiner decided that the KNF was a standalone document, subject to Examination, with the Knightsbridge Evidence Base Document and Knightsbridge Management Plan as supporting, evidential documents.

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Referendum (two to four months or more)

This was an exciting moment. We had spent two years establishing a network of area, street and building champions. We had split the KNA into North, South, East and West with leaders in each and identified one or more people responsible for each street, square or residential block throughout the KNA.

Our plan took a year longer than we had hoped to reach referendum (i.e. more than three years instead of two) but the referendum build-up would take up to 12 months at least to build the network and brief people. We began with quarterly, in the first year, then monthly and finally weekly and twice-weekly meetings with the Area Champions. Paragraph 157 on page 95 of the High Court judgment involving St Quentin & Woodlands Neighbourhood Forum acknowledged 'democratic' lobbying or campaigning.

This process worked very well. WCC's electoral services team was magnificent. They helped us to understand the detailed timetable and processes. This includes two important dates not published by WCC. These were the posting dates for poll cards and postal votes which mattered because we wanted to reach people with postcards or leaflets just before they received important information. Forums are allowed to see the full register which is helpful because we were able to tell posters that '50 people' in their building were registered to vote. WCC took a very narrow view of voting by proxy which we did not challenge.

A number of strict legal restrictions applied during the formal 'referendum period'. For example, a 'referendum expenses' limit was calculated and set by WCC at £2,470.58 based on the number of persons entitled to vote in the Referendum. We had to submit an 'expenses return'.

The KNF achieved overwhelming support (93.0%) from those voting on a good turnout of 19.21% for neighbourhood planning in London. This result was 'declared' by WCC on the night of the Referendum. We think there was relatively low turnout from students at Imperial College London and soldiers at the Hyde Park Barracks despite our efforts to engage them.

Making the Plan (two months)

The Plan comes into force and becomes part of the statutory development plan for the area as soon as it passes referendum by virtue of section 38 (3A) of the Planning and Compulsory Purchase Act 2004. This is important because the plan switches from being one of what could be many material considerations in the determination of planning applications, to being the starting point for determinations. As a result, the subsequent formal 'making' of the Plan is simply 'confirmatory' since it is already deemed part of the development plan. WCC must 'make' (i.e. adopt as part of the statutory development plan) the Plan within a statutory 'eight week' period following the neighbourhood plan passing the referendum (unless there is a breach of Human Rights or European Union law). The Neighbourhood Portion of the CIL rises from 15% to 25% (uncapped) when the Plan is 'made'.

In theory, three decisions by WCC could be judicially reviewed within six weeks of the relevant decision i.e. the decision to accept (or reject) the Examiner's recommendations; the decision to hold a Referendum; or the decision to make the Plan.

Some benefits of neighbourhood planning

The progress of the KNF had been an important focus of community engagement. The making of the KNF crystallised the main benefits of the neighbourhood planning progress and meant that the community had produced a plan that would contribute to the long term success and sustainability of the KNA. It also triggered the higher prospective percentage of the 'neighbourhood portion' of Community Infrastructure Levy monies (i.e. an increase from 15% capped to 25% uncapped). As time had gone

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by, we had also understood better the considerable powers, responsibilities and opportunities given to the neighbourhood forum by the Localism Act, other legislation and national guidance. Perhaps, most important, we felt that we had been able to express our vision and plans to improve the KNA.

Bringing the plan to life (thereafter)

The KNP is keen to bring the KNP to life and expects to focus on the following priorities:

1. Pursuing at least once all 85 of the Knightsbridge Management Plan actions listed;
2. Commenting selectively on significant planning applications or consultations relating to the Area e.g. proposals to develop Hyde Park Barracks. Speak to WCC officers;
3. Commenting on emerging planning policies that could affect the area;
4. Seeking to ensure that CL and other planning obligation monies are utilised fully in line with the neighbourhood plan;
5. Monitoring the application of the policies to ensure they have been applied consistently and interpreted correctly in response to planning applications;
6. Report annually or biannually on outcomes e.g. early 2020;
7. Reviewing the policies and updating the Plan from time to time e.g. minor or more substantial changes; and
8. Applying to Westminster City Council to review its designation in July 2020.

WCC has published guidance on the process for spending the neighbourhood portion of CL monies. The KNP can be contacted via its website which also contains details of our work knightsbridgeforum.org.

Legal disclaimer: This Knowledge Note is based on the Knightsbridge Neighbourhood Forum's recollection of events and is published without accepting any responsibility or liability to any other organisation or person.

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Appendix: Timeline for Knightsbridge Neighbourhood Plan (KNP)

2014	
27 March	Knightsbridge Neighbourhood Area designated as a residential area by WCC (after eight week representation period (27 November 2013 to 27 January 2014))
2015	
21 July	Knightsbridge Neighbourhood Forum designated by WCC (after six week representation period closing on 15 May 2015)
Autumn	Consultations with local stakeholder organisations to identify key issues and priorities
2016	
January	Initial website launched
26-27 February	First public exhibition with display boards
6 July	Second public exhibition with display boards (to firm up 'Top 75 priorities')
July-August	Vision, values, objectives and priorities finalised and first draft of KNP prepared
Autumn	Informal consultation on first draft KNP with local stakeholder organisations and WCC and preliminary health check from Christopher Lockhart-Mummery QC (via NPIERS)
8 December	Pre-submission (Regulation 14) consultation launched by KNP (six weeks minimum)
2017	
15 February	Regulation 14 consultation closes
27 April	Revised draft KNP sent for NPIERS Health Check and to WCC for detailed comments
25 May	Health Check Report from Christopher Lockhart-Mummery QC (via NPIERS)
7 July	Comments from WCC on revised draft KNP
22 August	Final draft KNP circulated to local stakeholder organisations
August-September	Statutory consultations on Strategic Environmental Assessment Screening report and Habitats Regulations Assessment Screening report (assumes no 'significant' positive or negative impacts on relevant criteria) (five weeks minimum)
October	Informal consultation on Basic Conditions Statement with WCC
22 November	KNP submitted to WCC with seven supporting documents
20 December	Submission (Regulation 16) consultation launched by WCC (six weeks minimum)
2018	
14 February	Submission (Regulation 16) consultation closes
28 February	Ms Jill Kingaby BSc (Econ) MSc MRTPI (of IPo) appointed as Examiner by WCC
11 May	Statement of Common Ground sent to Examiner with agreed other changes to KNP
10 July	Examiner's report and Appendix published on KNP and area for referendum
21 August	Council decided to accept all the Examiner's recommended modifications*
August-September	Forum allowed to view full electoral register subject to strict restrictions
10 September	Information Statement for Referendum published by Westminster
13 September	Notice of Referendum and poll cards posted to voters. NB date not published by WCC
5 October	Postal votes posted to voters. NB date not published by WCC
18 October	Referendum of residents on electoral roll in the Knightsbridge Neighbourhood Area*
11 December	KNP 'made' (i.e. adopted) by Westminster*

*Judicial review may be possible at these stages

Nimax Theatres Ltd

**SOHO DRAFT NEIGHBOURHOOD PLAN
Consultation Comments September 2019**

General

Over 15 million people a year attend a West End performance, with a number of iconic theatres based in and around Soho. As well as being one of the major attractions for visitors to the area, being an acknowledged showcase for London, the theatres are significant employers and make an important contribution both culturally and in heritage terms.

As part of the day and night time economy, theatres are well managed and controlled by Westminster City Council through their licence conditions and therefore do not contribute to the more problematic aspects of the night-time economy noted in the plan.

In that context we would expect to see theatres referred to more prominently in the Plan in terms of the cultural and heritage offer of the area please.

Some opportunities for this in the draft are noted below but please consider generally.

Executive Summary

Para 1.7 –also include reference to City Plan commitment in its proposals to protecting existing arts and cultural uses, ensuring heritage assets and their settings are conserved and enhanced. This helps to clarify why the Plan does not need to address theatre as a protected use or to protect already listed buildings.

Policies

1. **Summary:**
Entertainment and the Night time Economy, Para 2.4 The agent of change principle should also be applied to protect existing cultural uses from the impact of new neighbouring development.
Environment, Para 2.8 There are likely to be practical limitations on large commercial premises providing extra waste and recycling storage capacity for neighbouring small commercial units within a 100-metre radius particularly in terms of security and insurance issues.
2. **The Neighbourhood Area – Soho Today**
Working in Soho, Para 6.8 add "entertainment" to food, beverage and hospitality and add "theatres" to music venues, bars etc
3. **Plan Policies**
Culture and Heritage para 7.1.9 add "theatre production" to "Galleries and other cultural uses"
The Night Time Economy Policy 14 - see comment above re Agent of Change principle

Recommendations and Projects

Recommendation 10: to the sentence "to avoid adding further costs to well-run small historically significant local businesses" add "and cultural venues"

Recommendation 12: this has evolved from the first draft of the plan which proposed a review of licences to ensure all deliveries are timed between 7am-11pm. In practice, no premises owner would be likely voluntarily to apply to impose more onerous conditions on their licence not only because of the process and cost but not least because of the risk WCC may choose to review other unrelated licence conditions unfavourably. An informal code of conduct or voluntary agreement from licence holders may be more likely to achieve the desired results.

General: theatre owners /operators would not generally support recommendations that would impede show get-ins and get-outs, and other special activities involving increased delivery and supply needs – such as live broadcasts. This is consistent with the support for culture in the general planning framework and the London Plan in particular which makes clear that cultural venues should be protected, and promotes the management of the night-time economy through "an integrated approach to planning and licensing, out-of-hours deliveries, safety and security and environmental and cleansing services should be supported".

The draft recommendations in the Plan may not be intended to cut across this, but restrictions on deliveries after 11pm, along with the proposals relating to developments generating freight and servicing movements, and relating to the restrictions on vehicles over 7.5 tonnes are a concern. Additionally, any change to making streets pedestrian only might impede access for get in and get outs which needs to be protected.

David Bieda

Anna,

I think the plan is deficient on street & lighting issues & there should be as follows which I am sure everyone would agree with.

LIGHTING

There should be consistent lighting throughout the area with not more than three lamp types, avoiding tall post mounted lanterns which cause glare into office and residential and where footways are narrow the lanterns should be façade mounted so as to:

- Free up the footways;
- Reduce LA maintenance costs;
- Cast a more uniform light.

As most of Soho is a conservation area pot optics should be avoided as they cause glare and hide the historic fabric. Sugar bowls should be used as they reduce glare and diffuse the light spread. LED lamps should be used throughout Soho as they reduce both carbon emissions and energy needs and are in accordance with the 2018 Highways Infrastructure Management Plan.

CARRIAGEWAYS & FOOTWAYS

Much of the area's surfaces are sub-standard, not befitting an important conservation area and there are many types of discordant footway surfaces. Greenmore York stone should gradually replace asphalt to provide consistency and a more attractive public realm. Bi-annual audits of street surfaces should be carried out as many streets are over-worn and unattractive.

See: <https://www.sevendials.com/the-study/seven-dials-renaissance-study>

A new web edition will shortly be published in Beta with a lot of detail on these issues. Best,

db

Westminster Cycling Campaign

Dear Anna

Thank you for consulting the public about your draft plan. I am responding on behalf of Westminster Cycling Campaign, the local group of the London Cycling Campaign.

We would very much like to reduce motor traffic in Westminster, so as to reduce air and noise pollution, reduce CO2 emissions, encourage walking and cycling and generally improve the quality of life. We therefore support a number of your proposed policies, namely the following:

17: Residential development should not only be car free but by legal agreement ensure that occupants of new housing have no right to apply for a residents parking permit (other than those with special needs).

In a district as well served by public transport as Soho and with so many amenities within walking or cycling distance, it is absurd that residential developments should have car parking. However, it is important to prevent residents of these developments from applying for parking permits, so as to allay the fears of existing car-owning residents that "their" spaces will be taken by the residents of the new developments.

24: The public car parks at Brewer Street and Poland Street should be safeguarded and temporarily protected from development, which changes their use until proposal for their reuse as sites for micro-consolidation can be brought forward.
This is an innovative and imaginative proposal that should not only reduce the number of movements by freight vehicles but also discourage motorists from driving into Soho and parking there.

29: Façades and entrances to premises should display clearly a street number for each premises to facilitate better way finding.

This too is an innovative and imaginative proposal that could usefully be applied across central London. Inability to find a particular building can result in longer journeys and cause vehicles to stop and start unexpectedly, creating a hazard to other road users.

30: Major developments in addition to their provision internally for employees who cycle will be expected to consider and where practical provide more cycle stands in the immediate vicinity of the development in order to enhance the use of cycles by visitors to the building.

This is something that had often been overlooked in the past. We therefore welcome its inclusion in your Plan.

All of that said, we feel that the policies you propose, although a useful step in the right direction, are unlikely to change the face of Soho. We therefore urge you to support blocking through motor traffic so as to create a low-traffic environment.

Please feel welcome to contact us if you need further support on any of these policies, some of which may prove controversial.

Best regards

Colin Wing

Westminster Cycling Campaign The local group of the London Cycling Campaign www.westminstercycling.org.uk

Transport for London

Transport for London



TfL ref: WSTM/19/523

anna.doyid@planforsoho.org

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11 September 2019

Dear Sir/Madam,

Re: Soho's Neighbourhood Plan 2019 to 2034

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL Property to reflect TfL's interests as a landowner and potential developer.

Thank you for giving TfL the opportunity to comment on Soho's draft Neighbourhood Plan. Our role is to consider the strategic transport aspects of growth and development in the statutory context of the London Plan and on behalf of the Mayor of London.

We remind the Council that the draft London Plan has now been through its Examination in Public (EIP), and a revised draft with further suggested changes made in response to discussions at the EIP was published online in July 2019. The draft Plan is a material consideration in assessing local policy, and given its advanced stage in the adoption process, we will have regard to it when assessing and responding to local planning policy consultations, including Soho's draft Neighbourhood Plan.

Local Plan policies should be developed in line with relevant draft London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy (MTS). In particular, the Local Plan should explicitly refer to the 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. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

This means new development needs to be planned around space-efficient modes of transport. This approach is fundamental to making the best use of land to increase housing delivery. Policies that prioritise walking, cycling and using public transport in the location and design of new development and associated public realm would therefore be strongly supported. We strongly encourage embedding the Mayor's Healthy Streets Approach to further support the policies set out in Soho's draft Neighbourhood Plan. This will demonstrate how streets can be further enhanced in order to create a healthier city, in which all people are included, can live well, and where inequalities are reduced.

We therefore welcome Soho's promotion of sustainable and improved public realm which will help create a healthier and less vehicle-dominated Westminster. We also welcome the support and inclusion of Crossrail 2 into the draft neighbourhood plan. Given that the whole of Soho has a Public Transport Access Level (PTAL) of 6b, we are greatly supportive of Policy 17 in this plan that states that all new developments in Soho should be not only car-free, but also ensure that occupants of new housing have no right to apply for a resident parking permit. Car-free developments in this part of London are especially important to reduce the impacts of growth and densification on streets, which are fundamental to moving people and goods as well as places in their own right. This approach reflects the borough's connectivity by public transport and access to local jobs and services, which are among the highest of any part of London, and indeed any city in the world.

However, we are cautious about part of Policy 24, which safeguards car parks at Brewer Street and Poland Street for a minimum period of 5 years, so that they can be redeveloped as sites for micro-consolidation if proposals come forward. We strongly support the future use of these sites for micro-consolidation and any future plans should ensure that the highest priority is given to last mile deliveries by foot and cycle, with electric vehicles being used as a last resort. However, the continued use of these sites as car parks contributes to congestion, road danger and vehicle dominance, and encourages car use in a part of the city where it should be discouraged. If proposals for redevelopment into other uses come forward, they should be judged on their merits. Consideration can then be given to how proposals might include an element of micro-consolidation while also allowing other uses appropriate to Soho to form part of any redevelopment.

We have set out specific comments and proposed changes in Appendix A on the following pages which we hope are helpful. I trust that these provide you with a better understanding of TfL's position on Soho's draft Neighbourhood Plan. Please do not hesitate to contact me should you have any queries or clarifications about these comments.

We look forward to continuing our work together in drafting the final document.

Yours faithfully,

Josephine Vos | Acting Manager
London Plan and Planning Obligations team | City Planning
Email: josephinevos@tfl.gov.uk

MAYOR OF LONDON



VAT number 756 2109 90

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Appendix A: Specific suggested edits and comments from TfL on the Soho Neighbourhood Plan

Section	Page	Track change/comment
General		The plan should refer to the Healthy Streets Approach and include the Healthy Streets Wheel diagram as illustrated in Appendix B. We also strongly encourage reference to the Mayor's Vision Zero approach where policies seek to improve safety and quality of the public realm.
Section 3 - Introduction	8	The reference to the London Plan Examination in Public is out of date. Please amend text to read: 'The current London Plan was adopted in 2016. However, the draft London Plan has been published by the Mayor and is going through its examination in public. It has now been published through its Examination in Public and is expected to be published during winter 2019/20.'
Section 6 - Accessibility and Environment in Soho	16	
Section 7.6 - Providing Housing	33	Supporting text in section 7.6.5 should be reworded: 'Therefore, unless it is parking for special needs in line with the policies (typo) of the London Plan.' Please amend text to read: 'Therefore, all new housing should be car-free, except for disabled persons car parking, in line with the draft London Plan standards'

Section 7.6 - Providing Housing	33	Supporting text in paragraph 7.6.5 states that residents in new developments should be offered the option to belong to a car club so that they have access to a range of vehicles for unavoidable and essential uses. In some circumstances car clubs can provide an alternative to private car ownership. However, it should be noted that car clubs are not public transport and therefore do not contribute towards the Mayor's aim for mode shift to walking, cycling and public transport. We are concerned that this nuance is not reflected in policy. In an extremely well-connected borough like Westminster, where car ownership is low, car club provision risks offering more opportunities for car use by people who do not currently have access to a car than it does of reducing private ownership (unless paired with other measures such as reducing the overall supply of on-street private parking spaces). As such, the draft London Plan does not support their provision in the CAZ. There may be opportunities to use car clubs to make more efficient use of the kerbside and reduce parking stress, but only if they are paired with a reduction in the amount of kerbside space available to residents' private cars.
Section 7.6 - Providing Housing Policy 17	33	We are very supportive of Policy 17 in this plan, which states that all new developments in Soho should be not only car-free, but also ensure that occupants of new housing have or right to apply for a residents parking permit. However, we would suggest using the term 'disabled people' rather than 'those with special needs' as it is more precise. Please amend text to read: 17: Residential 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 those with special needs).



Section 7.8 Residential Amenity - paragraph 7.8.5	36	We welcome the statement that Delivery and Servicing Plans will need to contribute to good quality and/or to reducing vehicle movements and improve air quality. We are also very supportive of last mile deliveries being made by foot and cycle and recommend that this is prioritised above the use of low emission vehicles. Please amend text to read: 'Major development proposals should be accompanied by a clear Delivery Servicing Plan (DSP). The DSP must show how serving the premises will contribute improving air quality and/or to reducing vehicle movements and be focused on measures such as prioritising last mile deliveries to be made by foot and cycle 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, and last-mile delivery modes such as by bicycle and on-foot'
Section 7.10 - Traffic Congestion and Freight Consolidation	40	We welcome the reference to the Mayor's strategic mode share target.
Section 7.10 - Traffic Congestion and Freight Consolidation Policy 24	41	As stated in the main body of the letter we are cautious about part of Policy 24, which safeguards car parks at Brewer Street and Poland Street for a minimum period of five years, so that they can be redeveloped as sites for micro-consolidation. We strongly support the future use of these sites for micro-consolidation and any future plans should ensure that the highest priority is given to last mile deliveries by foot and cycle, with electric vehicles being used as a last resort. However, the continued use of these sites as car parks contributes to congestion, road danger, severance, vehicle dominance, noise, poor air quality and climate change, as well as encouraging car use in a part of the city where it should be discouraged. Walking, cycling and public transport therefore need to be the primary ways to travel to, from and around Soho, and London more widely. If proposals for redevelopment into other uses come forward, they should be judged on their merits. Consideration can then be given to how proposals might include an element of micro-consolidation while also allowing other uses appropriate to Soho to form part of any redevelopment.

Section 7.10 - Traffic Congestion and Freight Consolidation Paragraph 7.10.2	41	Please amend reference to 'the new London Plan' to 'the new draft London Plan' throughout the document.
Section 7.12 Pedestrians	44	We strongly welcome the objective for Soho to be seen as a 'pedestrian priority area'
Section 7.12 Pedestrians	44	Please correct spelling of 'Elisabeth stine'
Section 7.12 Pedestrians - Policy 27	45	Reference to delivering Healthy Streets and Vision Zero Strategy should be included on designing future pedestrian routes. Please amend text to read: Policy 27: All development proposals should be designed in such a way as to facilitate pedestrian movement. Proposals should seek to deliver safe, efficient and inclusive design in line with the Healthy Streets Approach and Vision Zero Strategy: <ul style="list-style-type: none"> • Create clear and well signed pedestrian routes • Provide even surfaces and minimise steps and level changes • Design out blind spots and recessed doorways • Provide well-lit and clean temporary passageways during development and construction works • Reduce vulnerability to flash flooding and ensure that the neighbouring public realm is well drained using sustainable urban drainage (SUDs) wherever possible.
Section 7.13 Cycling	46	We welcome reference the creation of more on street cycle parking and would encourage these to replace current on street car parking.

ENDS