

# Shaftesbury

By email to: [neighbourhoodplanning@westminster.gov.uk](mailto:neighbourhoodplanning@westminster.gov.uk)

Date: 6 July 2020

Dear Sir/Madam,

## **Soho Neighbourhood Plan – Regulation 16 – Response from Shaftesbury**

We are now writing to provide you with our formal representations on the draft Soho Neighbourhood Plan (Regulation 16 stage). These are set out below and in the tabulated appendix attached to this letter.

Overall we consider that the latest draft of the Neighbourhood Plan has made significant progress and has successfully responded to a number of concerns raised with the previous iteration. As such this response concentrates on just 7 of the 31 proposed policies, which we consider could still benefit from further refinement particularly in light of the current circumstances surrounding COVID-19 – the impacts of which clearly will still be felt for years to come.

A positive policy regime is now even more essential to the ongoing success of the West End. The continuity and consistency of planning policy and its application are essential to business planning, and we would hope that the Soho Neighbourhood Plan recognises this, and recognises that Soho's unique character is largely formed through the ongoing success of the commercial enterprise found within it, which are likely to be significantly impacted upon over the coming months and years.

By day Soho offers a wide variety of independent, quirky shops and is a hub for creativity with many small businesses, typically in the media, tech and fashion sectors. In the evening and night-time, its distinctive atmosphere and exceptional choice of restaurants, cafés, bars and clubs, together with nearby theatres, create a popular destination for visitors as well as the West End's large working population. It also has a diverse residential community which plays an important role in the mix of people who inhabit Soho on a daily basis.

It is critical that this variety of uses can continue to flourish within Soho, and that is why we have specifically commented on the draft policies within the plan which may inhibit this; namely the growth of office and employment space, and the protection and growth of the night-time economy. These are both fundamental and inter-dependent pillars of the Soho character and economy which the plan should be seeking to encourage and support. However, as drafted the Plan may instead reduce the ability of Soho to provide a mix of employment spaces to suit the market, and may significantly reduce the ability of the night-time economy to grow and diversify – a key objective as set out in the Mayor's Night-time Economy SPG.

The full impact of COVID-19 on both of these sectors is yet to be fully understood, but it is unlikely to be positive. Planning policy should not act as an additional barrier to this recovery, but should instead help to foster and promote it.

Soho has benefitted from the flexibility to adapt the use of buildings 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.

Soho plays a key role in London's 'visitor economy', located within the West End Strategic Cultural Area and adjacent and very much in the sphere of the West End International Centre. A plan that supports this 'visitor economy', which includes the evening and night-time economies is also important in attracting office occupiers to the West End, making it a prosperous seven-days-a-week trading location for the West End's unique offer of retail, restaurant and leisure choices, which is on a scale greater than any other UK city.

## Conclusion

We welcome the opportunity to continue a constructive dialogue over the evolution of the draft Soho Neighbourhood plan and hope our comments, borne out of our practical experience, will make a valuable contribution to the consultation process.

### COVID-19

The COVID-19 pandemic has had an immediate catastrophic effect on everyday life in the West End. The economy will potentially take several years to recover into what could be a very different environment.

We understand that the Neighbourhood Plan is a long term plan (aligned with the Westminster City Plan to cover the period until 2040) and as such the policies need to be robust and address the longer strategic objectives for the area. However, it is clear that the planning system will need to be responsive to the changes in world circumstances, which have happened since the draft Plan was first published.

In order to get the economy moving again, preserve jobs and get day to day life back to a new normal, the planning system needs to accommodate greater flexibility in its approach to land use, how the retail, leisure and employment sector can all adapt to overcome the impacts of the pandemic, in harmony with the quality of life of residents. The Neighbourhood Plan should incorporate flexibility within its policies to enable the economy to function over the time of the Plan and be able to accommodate the impact of COVID-19 in its final form, whether this is responding the current live issues, or to have responsive measures in the Plan to facilitate future impacts.

Our representation is considered in a pre-COVID context as that is how the Neighbourhood Plan is currently drafted, but at relevant intervals we have we have also made additional comments on the impact of COVID-19 in an orange box for consideration.

Yours faithfully,

*Lydia Clarkson*

HEAD OF PUBLIC REALM