

Whilst a great deal of hard work has gone into this document – The Soho Neighbourhood Plan February 2020 - over a period of time and there is much to commend in it, it is clear that it must be reviewed in the light of the **significant consequences of Covid-19** on most of its basic premises.

In particular, the drop in demand for office space, reduction in footfall to shops and in the use of restaurants, bars/pubs and the likely increased use of cars from visitors given concerns about using public transport and the reduced service, especially of night tubes.

The context and circumstances have changed radically and most likely for the long-term, and the Soho Neighbourhood Plan needs to respond to this.

**There needs to be a review of this Soho Neighbourhood Plan in the light of Covid-19.**

The revised plan should address several areas of concern for residents in particular.

- 1) Whilst mention is made of **'pocket parks'** (page 24) as essential, the focus is on such provision for employees - office and other workers, not on residents.

During Lockdown, the lack of safe residential outside space in Soho has been only too apparent.

The block where I live, Stirling Court in Marshall Street is lucky to have a communal roof terrace which has been a godsend during the Covid-19 crisis, and is essential for the health and wellbeing of residents in the block (more than 60 people) but we understand that the landlords are planning to commandeer this vital outside space for commercial gain. This is clearly unacceptable on all levels.

The Soho Neighbourhood Plan makes **no reference to preserving or creating 'green pockets' for residents** such as the Stirling Court roof terrace. It should. They are essential residential amenity.

There is less need for office terrace space, since employees spend less time at work, at leisure.

Office terrace spaces that **overlook residential buildings** should be prohibited. This is not adequately addressed in the Soho Neighbourhood Plan.

Additionally, whilst green roofs are mentioned in the plan, it does not go far enough in insisting that the **'roof-scape'** (page 24/25) is as important as the street-scape and should be recognised as such in planning application assessments. Too many developers install ugly plant on top of their developments, ruining the 'sky-scape' and causing noise and pollution for residents (most of whom live up high as the plan states). The plan should focus more on the necessity to incorporate the

roof of any development into the overall height and aesthetic of the building design and make sure that the sky-scape is enhanced and not diminished.

It is now also critical that The Soho Neighbourhood Plan, in the light of **recent legislation allowing freeholders to add two extra stories** onto residential blocks, addresses this controversial issue, particularly where it will deny residents access to existing outside amenity.

- 2) The issue of **Residents' Parking** (page 16) and the proposal in the Soho Neighbourhood Plan to stop all future Residents' Parking Permits is astonishingly misguided and should be reviewed in the light of data and Covid-19, as a matter of urgency.

The **problem of pollution and congestion is not caused by legitimate residents' parking**. Only a proportion of the relatively small population of residents (c3000) have a vehicle and many use them occasionally. When they do use them, most leave and enter Soho only, not drive within it or sit with their engines running as visitors do.

The impact of Covid-19 and the dangers of being reliant on public transport to leave Soho are now all too evident thus, to deny Soho residents safe passage in a private vehicle that is available to all other UK residents is prejudicial and dangerous.

The two car parks in Brewer Street and Poland Street have c 200+ parking spaces and **encourage** non-residents to bring their cars into Soho, as do the hundreds of other Pay-to-Park spaces in Soho.

The Soho Neighbourhood Plan **scapegoats residents** and proposes to punish them for a problem that they are not responsible for, by removing their ability to park and therefore own a car for safe travel. Commercial revenue is being prioritised over residents' amenity, health and wellbeing: from non-resident parking fees and from encouraging footfall to the shops, bars and restaurants at the expense of residents. It is unfair and misguided.

During Lockdown it was notable that there were many empty parking spaces in Residents' bays, indicating that many who have Residents' Permits do not live here.

**The real problem** with pollution, congestion and road safety in Soho is **all the non-residents' vehicles** – private cars, cabs and suppliers' vans - on the streets and parking on single yellow lines, Pay-to-Park bays and in the two car parks (Poland Street and Brewer Street).

If the Soho Neighbourhood Forum is really serious about improving air quality in Soho then it should investigate and adopt some or all of the following measures:

- **The area should be restricted to residents' vehicles ONLY.** All other vehicles should be prohibited

- Repurpose the two car parks in Poland Street and Brewer Street.
- Remove all non-residents' parking bays; if necessary make some into Residents' bays.
- Double yellow line every street and enforce the parking restrictions.
- Ban all cabs and taxis from Soho. All cabs and taxis must drop off and collect customers from Regents Street, Oxford Street, Charing Cross Road or Shaftesbury Avenue – all within a few minutes walking distance of any location in Soho.
- Consolidate all suppliers' vehicles outside of Soho and bring in goods on electric vehicles at specific times, or have them load and unload on one of four main road axes as above.
- Enforce the delivery time slots when supply vehicles can be in Soho – most days it is impossible to walk across the road safely for double parked vans with engines idling, causing significant congestion, noise and pollution.
- Properly police and clamp down on the abuse of the Residents' Permits to non-residents and to those whose primary residence is not in Soho and who are not on the Electoral Role or paying Council Tax on a Soho property as their main residence.
- Restrict every household to one car and one motorbike/scooter.
- Install or facilitate the installation of electric charging points in every parking bay and garage space.
- Offer subsidies for residents to change to/buy electric cars.
- Restrict all residents' cars to below a 1.2L engine or allow only hybrids or electric cars.
- Offer subsidised Santander bicycle usage for residents, e.g. no daily charge and/or half price rates.
- Introduce a residents' car-sharing scheme. Zipcar is a fabulous service but it is only sufficient for hiring a car for a few hours to a couple of days maximum. A subsidised scheme (could be in conjunction with an existing one like Zipcar or use existing residents' vehicles and parking spaces or be an entirely new scheme) should be promoted by the Soho Neighbourhood Forum. **Note** that such a scheme is actually taking cars **out** of Soho for days or weeks at a time and would have minimal impact on pollution, congestion and road safety within Soho itself.
- Stop supply vehicles and cabs/taxi idling and tooting their horns; this is huge problem on the streets of Soho. I have not once seen a resident do this.

Most Soho residents do “live car-free” most of the time. This is one of the benefits of living centrally; we walk within Soho. To “promote car-free living further” there needs to be incentive schemes like the ones mentioned above and there needs to be fresh air for us to do it – i.e. no other vehicles in the area and much less construction noise and pollution. Anything less is blatantly prejudiced in favour of the commercial sector and potentially dangerous to residents' health.

The Soho Neighbourhood Plan needs to be focused on '**promoting car-free shopping and entertainment**', not on 'car-free living'. The damage done by the former is hugely disproportionate to any done by the latter.

The current proposal and approach to residents' car ownership/parking in the Soho Neighbourhood Plan is **a complete red herring** and should be scrapped.

It is possible to reduce pollution and congestion rapidly and fairly by introducing some or all of the measures above and these should be given full and serious consideration.

- 3) The provision of **Cycle Stands** (page 30) as the Plan mentions is essential but these were actually removed from Stirling Court in Marshall Street by the freeholder when they refurbished the bottom half of the building in 2018. There is currently no secure bicycle parking provision for the many residents of Stirling Court. This removal was approved by Westminster City Council Planning, despite bicycle stands for c.50 bikes being included in the plans and approved by WCC and installed in the basement of Stirling Court, but these spaces are **not available to residents**.

How does this kind of behavior fit with reducing pollution and building a safe and health car-free community? Such lack of concern for residents and for compliance with wider objectives for Westminster and National Policy demonstrates that such decisions can not be left in the hands of developers, or Westminster City Council Planning and that the Soho Neighbourhood Plan should address this directly.

- 4) One of the key problems regarding housing in Soho currently is **short-lets, like Airbnb**. It is an issue particularly prevalent in the West End. I do not feel that the Soho Neighbourhood Plan addresses this issue adequately.

Short-lets deprive the long-term rental market of much needed supply, inflate rental prices and destroy communities by causing noise, nuisance and fire, safety and security issues in residential blocks as well as incurring extra wear and tear to the buildings, increasing costs.

Residential management companies and Westminster City Council are slow to react and not proactive in dealing with this issue. Data on which flats are doing short-lets is easily available from the websites and it would be worth the Soho Neighbourhood Forum spending some time on how they can help police abuse (an app, some resource to research or track, a forum for local management companies etc) and protect long-term residents and communities from the problems caused by short-letting.

- 5) No mention is made of support for the **reform of leasehold**. Since most of the properties in Soho are flats, most are subject to the iniquities of the leasehold system. There are plenty of groups advocating for the reform of leasehold, to common-hold or for other measures to reset the balance of power between freeholders and leaseholders and prevent abuses of power, including through the Leasehold Knowledge Partnership. Supporting such reform would radically improve the lot of many Soho leaseholders and is an important topic that should be addressed by the Soho Neighbourhood Forum.

Another under-emphasised housing issue is **longer-term rental agreements**. The plan should be encouraging such.

- 6) The **residential voice in Planning Applications** is sadly rarely heard. Whilst much mention is made in the Soho Neighbourhood Plan of managing development in Soho better, the problem remains that, in practice, Westminster City Council rarely denies the developers and freeholders anything, and most residents' objections to planning applications are ignored. The developers know the system and play it well. It is not an even playing field for residents who lack the experience, time and money to adequately oppose developers plans.

Developers can not be relied upon to do the right thing and ensure that residential interests are encompassed in their plans. The problem is largely systemic and needs radical reform which the Soho Neighbourhood Forum should be pushing for. WCC Planning does not appear to have the teeth, the will, the resources (human skills, time and money) to resist the developers or stand up for residents.

Being within the 'Stress Zone' and apparently having the protection of planning legislation concerning cumulative impact of restaurants and licenced premises has counted for nothing with numerous new restaurants, bars and clubs being given approval by Westminster City Council officials and developers' proposals, such as pedestrianising Beak Street and Marshall Street given approval without going through proper consultation.

The commercial imperative wins over and over again, at the expense of residential wellbeing and lifestyle.

Residents are left feeling powerless and hopeless without support. **We need a Residents Czar**. No mention is made of this in the plan.