

Representation from the Soho Society objecting to the definition of small hotels in the draft Westminster City Plan.

Submitted by Matthew Bennett, chair of the Society's Planning and Environment Committee on behalf of the Soho Society.

It is perhaps also relevant to state that I am also chair of the Soho Neighbourhood Forum (from its inception to date) as this role has relevance for this representation.

Context

The Soho Neighbourhood Area was designated on 5.4.2013 and the Neighbourhood Forum was designated on 25.7.2014 as a business neighbourhood forum with a steering group made up of equal numbers of business and resident representatives. The forum initially started plan making in the summer of 2015 with a number of working parties on various subjects. The one dealing with commercial matters began to discuss and test out the possibility of Soho becoming a special policy area. This policy option continued to be discussed within the Forum and more widely in Soho as development pressures intensified. This included a number of applications for hotels. Early drafts of the neighbourhood plan contained proposals for a special policy area to better protect the area and its creative and small business sectors.

In the spring of 2018 there was an enquiry into the actions and probity of the long term chair of WCC's planning committee which had caused local disquiet and more generally there were widespread predictions of losses of seats and local authorities for the Conservative party across London¹. This was not born out in Westminster, except in the West End Ward which covers Soho, where Labour made their only seat gain and the other sitting ward councillor hung on by only a few votes. This encouraged the elected majority party councillors for the ward and the council as a whole to become better aligned with local Soho views.

I was personally informed within a few weeks of the election that the much-delayed publication of a new draft local plan for Westminster would include a special section on Soho and propose ways to better preserve its character as a conservation area and its diverse range of businesses. This was the case and so reference to it was then removed from the draft Soho Neighbourhood Plan.

Drafts of the Westminster Local Plan 2019-40

The Soho Society and, as a whole, the Soho Neighbourhood Forum were delighted to see the eventual publication for informal consultation of the first draft of the local plan on 12th November 2018 as it contained provision for a Soho Special Policy Area in policy 19. In section C of that policy it stated "new hotels of more than 2,500 sqm will not be permitted".

We were surprised and dismayed when the plan was republished with changed wording on 19th June 2019 as the Regulation 19 draft. The Soho Special Policy Area is now policy 21 and has been revised. Section B of that policy says "The following uses will be supported.... Point 7. Small scale hotels".

¹ <https://www.politicshome.com/members/article/local-elections-2018-tory-anxiety-as-major-defeats-predicted-in-london>

Therefore, we sought clarification for the change and what 'small scale' meant from the city Council, with a number of reminders, but did not receive a reply before the end of the consultation period on 31st July. (see email string set out in Appendix A).

The definition of a 100 bedroom limit was then inserted at the last moment on 13th November as a minor modification (in Core 2, page 16, M/EE/18) to paragraph 21.7 the day that the plan was agreed by full council. There was no supporting evidence as to why this number of bedrooms had been chosen as the limit or any indication of what this would mean in terms of size and scale.

The Soho Society made a brief survey of the existing number of hotels shortly before this change was made which showed that the average number of hotel bedrooms per hotel was 67.8²

It is therefore the view of the Society that the proposed threshold of 100 bedrooms is too high and has not been evidence based. Given that there are a number of long standing viable small hotels in Soho, such as Hazlitt's and the Dean Street Townhouse, a much lower threshold would be more consistent with the reasoning set out in paragraph 21.7 and better accord with the reasoning given in both drafts of the local plan for the introduction of a special policy to protect Soho.

Specifically, Policy 21.A emphasises protecting and enhancing the existing scale of Soho. The explanatory paragraphs to policy 21 give more detail. 21.1 in its last sentence stresses the unique role of Soho within the city and that it is important that its distinctive qualities are conserved and

²LIST OF HOTELS IN SOHO WITH THEIR NUMBER OF ROOMS

1. *Soho Sanctum, Warwick St : 30*
 2. *The Courthouse, Gt Marlborough St : 126*
 3. *Ham Yard : 91*
 4. *Soho Hotel, Richmond Mews : 96*
 5. *The Nadler, Carlisle St : 78*
 6. *Hazlitt's, Frith St : 30*
 7. *Mimi's Hotel, Frith St : 58*
 8. *Dean St Townhouse : 39*
 9. *Kettner's Townhouse, Romilly St : 33*
 10. *Z Hotel, Poland St : 120*
 11. *Cafe Z Hotel, Moor St : 85*
 12. *YHA, Noel St : 36*
 13. *Piccadilly West End Shaftesbury Av : 60*
- Total rooms = 882 average size 67.8 rooms*

enhanced. All of 21.2 is relevant to acknowledging and protecting the existing scale of uses. 21.4 refers to maintaining the mix of uses.

It is difficult to be precise about the size of site that would be required to construct a 100 bedroom hotel with all its associated facilities but a consented scheme at 47-50 Poland Street ad 54-57 Great Marlborough St (planning ref 18/10886/FULL) gives a useful guide. There, a 194 bedroom scheme will be provided in 11,933 sqm. So, a maximum 100 bedroom hotel development on the same bases would require 6,150 sqm of space. Sites of this size and scale do not naturally exist within Soho and can only be assembled by amalgamating various existing premises together. This is likely to mean the displacement of other uses and in Soho terms a large-scale development which runs directly counter to the whole thrust of Policy 21.

We ask the inspector to add the following words to policy 21B point 7 after small scale hotels *"of up to 2,500 sqm"*. The limit as set out in the November 2018 draft or as an alternative wording *"of up to 40 bedrooms"* but we totally oppose the 100 bedroom limit.

Matthew Bennett MBE

19.6.2020

APPENDIX A

Please read this email string from the bottom upward and last email to me was sent on 1st August 2019 the day after the consultation had closed.

Matthew

I can only apologise, once again, for the delay in coming back to you.

I will speak to my colleagues in planning and policy about this and ensure that the concerns you have relayed are responded to in full.

I will ensure somebody comes back to you today to discuss this in more detail.

Kind regards,

Ed

From: Matthew Bennett <matthewbennett27@btinternet.com>

Sent: Thursday, August 1, 2019 9:16:22 AM

To: Blackwell, Edward: WCC <eblackwell@westminster.gov.uk>

Cc: Beddoe, Richard (Cllr): WCC <rbeddoe@westminster.gov.uk>; Barnes, Timothy (Cllr): WCC <tbarnes@westminster.gov.uk>; Cllr Jonathan Glanz <cllr.glanz@gmail.com>; Aiken, Nickie (Cllr): WCC <naiken@westminster.gov.uk>

Subject: Re: City Plan 2019-2040

Edward

See the email string below. I am very disappointed that I received no reply to my request made on 28th June before the close of the consultation yesterday. Given that changes to the Reg 18 draft of November 2018 will have been based on reasoned changes and put together some time before the publication of the Reg 19 draft on 19th June there was clearly evidence available as to why the policy had been changed and plenty of time for someone to respond.

I waited for a reasonable length of time before sending a reminder. I can only believe that a decision was taken not to be open and transparent. Given that I was asking on behalf of the designated neighbourhood forum and the recognised amenity for the area to which the policy applies I really think this is not an acceptable way to proceed. Even if I had had an email saying that the Council was not prepared to give an explanation on whatever ground it chose to base such a response it would have been better than just letting the clock run down.

This is the sort of way of behaving that completely destroys trust in politics and public bodies. I have always worked constructively with the City Council and find this approach really disheartening. I have not and will not copy the other West End ward councillor or any others because I do not want it to become a party political spat. What I would like to achieve by this email is ensure this sort of 'say one thing - do another' does not happen again Please don't just tell me it was an oversight because that is not credible.

Come on Westminster you can be better than this.

Matthew

Sent from my iPad

On 29 Jul 2019, at 10:59, Blackwell, Edward: WCC <eblackwell@westminster.gov.uk> wrote:

I apologise for not getting back to you sooner – I am just chasing this up and will respond asap.

Kind regards,

Ed

From: Matthew Bennett <matthewbennett27@btinternet.com>

Sent: 19 July 2019 10:30

To: Blackwell, Edward: WCC <eblackwell@westminster.gov.uk>

Subject: Fw: City Plan 2019-2040

Edward

Has Richard Beddoe had a chance to see this yet and respond? I get regular emails from different sources asking me to explain and would like to be able to do so accurately.

Be grateful for a reply soon.

Matthew

From: Matthew Bennett
Sent: Friday, June 28, 2019 1:27 PM
To: eblackwell@westminster.gov.uk
Cc: Tim Lord
Subject: City Plan 2019-2040

Edward

Could you ask Richard Beddoe if he could let the Soho Neighbourhood Forum and the Soho Society know the precise reasons why the proposed wording for hotels which was in the November 2018 version of the city plan –“19 C. New hotels of more than 2500 sqm will not be permitted” has been changed to “21 B. The following uses will be supported - small-scale hotels”?

As this was something that local people were concerned about and campaigned for a limit there is emerging concern that this new phrase may indicate a weakening of the policy within the overall Soho Special Policy Area in respect to hotels. In order to respond to questions about it would be helpful to know the reasoning that led to this decision.

Many thanks

Matthew