The Soho Neighbourhood Plan
July 2019
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1. EXECUTIVE SUMMARY

1.1 The Soho Neighbourhood Plan uses the powers created by the Localism Act 2011 to give people living and working in the area of Soho the right to draw up their own plan.

1.2 The Soho Neighbourhood Area (SNA) was decided upon in May 2013.

1.3 The Soho Neighbourhood Forum was designated on 25 July 2014 as a business Neighbourhood Forum, which is led by a Forum Steering Group (FSG) represented by an equal mix of residents and businesses.

1.4 Soho is a very diverse and intensively used area with many competing interests. The Forum Steering Group agreed a vision for the Forum to work towards and proceed to approach its development in ‘bottom up’ manner:

- The FSG consulted the local community to identify what residents, workers and visitors felt the key issues to be
- Objectives and aspirations were then devised to address the key issues
- At regular periods the FSG consulted a wider range of stakeholders to understand and ensure the aspirations were widely supported, gauge levels of support and views
- The FSG proceeded to develop detailed policy work built upon the foundations of community views.

1.5 A number of ideas came forward during the process, which cannot be taken forward in the neighbourhood plan. However, the FSG has produced a non-statutory (i.e. not legally binding) set of recommendations and projects to put forward to bodies such as Westminster City Council and Transport for London. These recommendations outline suggested approaches to help achieve the overall vision for Soho.

WHAT DID THE PUBLIC CONSULTATION REVEAL?

1.6 The FSG’s initial working parties established that there were 17 key issues. The first survey in 2016 received 993 responses to those issues indicating that these issues were of widespread concern. 19 aspirations were crafted suggesting how the key issues could be addressed. A follow up survey was conducted in 2017, where respondents were asked to indicate their level of support for each on a scale of 1 to 10. 542 responses were received with over 3,000 individual comments made. 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 as well as a desire to protect and enhance Soho’s creative industries and to improve air quality. The lowest level of support was for the aspiration to improve facilities for cyclists.

1.7 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. The FSG were very pleasantly surprised to see that Westminster in its
draft City Plan 2019-40, formally published on 19 June 2019, has taken that idea and fleshed it
out in a strong set of policies to help keep Soho special. Similarly, the proposals on making
development more ‘neighbourly’, protecting galleries and the arts, greening, protecting social
and community uses and securing improved digital infrastructure have all be reflected in the
City Plan. The Forum is grateful that the Council has been in listening mode, both to us and
others.
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 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.
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 proposal 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.
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
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.
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 polices 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.
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.
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.

<table>
<thead>
<tr>
<th>Survey Aspiration</th>
<th>Description</th>
<th>Support</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heritage and Culture</td>
<td>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.</td>
<td>88%</td>
</tr>
<tr>
<td>Creative Industries</td>
<td>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.</td>
<td>84%</td>
</tr>
<tr>
<td>Size and Scale</td>
<td>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</td>
<td>86%</td>
</tr>
<tr>
<td>Business, including Small Businesses</td>
<td>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.</td>
<td>82%</td>
</tr>
<tr>
<td>Entertainment Venues</td>
<td>To support the development of a number of suitably located live music venues of an appropriate scale for the area.</td>
<td>83%</td>
</tr>
<tr>
<td>The Evening and Night-Time Economy</td>
<td>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.</td>
<td>77%</td>
</tr>
<tr>
<td>Category</td>
<td>Objective</td>
<td>Achievements</td>
</tr>
<tr>
<td>------------------------</td>
<td>---------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>Housing</td>
<td>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.</td>
<td>79%</td>
</tr>
<tr>
<td>Housing</td>
<td>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.</td>
<td>83%</td>
</tr>
<tr>
<td>Housing</td>
<td>To enhance the attractiveness of Soho for residents, businesses, workers and visitors by reducing the high levels of daytime disruption by development.</td>
<td>76%</td>
</tr>
<tr>
<td>Housing</td>
<td>To enhance the attractiveness of Soho for residents by reducing unnecessary night-time noise.</td>
<td>76%</td>
</tr>
<tr>
<td>Housing</td>
<td>To enhance the attractiveness of Soho for residents, businesses, workers and visitors by reducing crime and antisocial behaviour.</td>
<td>76%</td>
</tr>
<tr>
<td>Air-Quality</td>
<td>To significantly improve air quality across Soho.</td>
<td>83%</td>
</tr>
<tr>
<td>Traffic Congestion</td>
<td>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.</td>
<td>78%</td>
</tr>
<tr>
<td>Green Infrastructure</td>
<td>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.</td>
<td>82%</td>
</tr>
<tr>
<td>Pedestrians</td>
<td>To ease movement for pedestrians.</td>
<td>81%</td>
</tr>
<tr>
<td>Cyclists</td>
<td>To improve facilities for cyclists.</td>
<td>63%</td>
</tr>
<tr>
<td>Recycling</td>
<td>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.</td>
<td>84%</td>
</tr>
<tr>
<td>Waste, including Food Waste</td>
<td>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 collections and other similar facilities.</td>
<td>81%</td>
</tr>
<tr>
<td>Public Spaces</td>
<td>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.</td>
<td>77%</td>
</tr>
</tbody>
</table>
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. 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.

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…”

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. 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/westminsters-city-plan-strategic-policies
2 https://www.westminster.gov.uk/cityplan2040 Page 53, Policy S7
3 https://www.westminster.gov.uk/conservation-area-audits
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 Profile compiled by Westminster City Council, the ward was home to 216,225 jobs provided by 19,767 businesses. It is difficult to get accurate figures for Soho on its own but as it is a commercially and intensively used part of the three areas that make up the ward, (Mayfair, Fitzrovia and Soho); the numbers are likely to be at least a third of those totals. It is also the most economically productive Westminster ward with a gross value added of approximately £19 billion.

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.

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 260,000 visit the West End ward every day. Over a third of visits are on foot and that percentage continues to increase As Soho’s profile continues to rise, it is becoming home to an increasing number of hotels, which although they support the visitor economy and provide jobs tend to displace some of the very mixed uses which give the 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.
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 London\(^5\). 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 deficiency\(^6\) and the London Heat Map indicates that wasted heat and carbon emissions are high\(^7\).

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\(^6\) [https://www.westminster.gov.uk/cityplan2019-2040](https://www.westminster.gov.uk/cityplan2019-2040) Pages 133 and 136

\(^7\) [https://www.london.gov.uk/what-we-do/environment/energy/london-heat-map/view-london-heat-map](https://www.london.gov.uk/what-we-do/environment/energy/london-heat-map/view-london-heat-map)
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 Soho. There are 226 heritage assets and listed buildings within the Soho Neighbourhood Area. 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

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8 Survey of London Volume 33, General Introduction, Page 1
9 https://www.english-heritage.org.uk/visit/blue-plaques/
10 AECOM Soho Heritage and Character Assessment August 2018, Page17
maintained and repaired wherever possible. This existing culture and heritage makes the area an attractive one for employers to attract and retain staff.

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” 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”.

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. 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. Policies 1 and 2 of this Plan seek to support the City Plan’s approach by generally preventing tall buildings as these would erode

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11 Ibid, Page 74
12 BOP Consulting 2013 Soho the world’s creative hub
13 AECOM Soho Heritage and Character Assessment August 2018, Page 18
14 Publica Soho Public Realm Study 2014, Page 9
15 SNF Soho Survey 2016 pages 26 and 38 and Aspirations for Soho report 2107 page 7
16 https://www.westminster.gov.uk/cityplan2040 Pages 93-95
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 Façades 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 façades on key streets (e.g. Carnaby Street), while employing a style and form that is responsive to the historic fabric of the area. This will maintain and enhance the interest and distinctive character of the area, without subduing the back-street quality.\(^{19}\)

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 Publica Soho Public Realm Study page 10


Pages 16 and 19

\(^{19}\) AECOM Soho Heritage and Character Assessment Page 74
and spirit/brand, which “has a unique role to play within the wider west End”. While the difficulty in identifying an intangible concept such as the ‘Spirit of Soho’ is recognised, what is clear is that this intangible factor is an important part of the 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 façades 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 considered.

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”. 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.

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20 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
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.
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. 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). 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

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23 Soho Survey 2016 pages 7 and 38 and Aspirations for Soho 2017 summary of average strength of agreement
maintain or enhance the townscape”. It is important for Soho’s reputation for creativity and innovation that we do not seek to over specify what this character should be over the life of the plan by a design code today that might be unduly restrictive in years to come but the use of good design, colour detail and a respect of the environment and heritage of the local context as suggested by AECOM will be important factors in maintaining Soho’s character.

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 staff. 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.”

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 of

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25 AECOM Soho Heritage and Character Assessment August 2018, page 74
26 Ibid, Managing Change section, page 74
27 https://www.westminster.gov.uk/sites/default/files/west-end-ward-profile.pdf Page 10, and BOP Consulting, Soho the world’s creative hub, 2014
28 File note of discussion 18.4.18 between M Bennett and Neil Hatton see Evidence Base
commercial and retail units on the ground floor” and “vacant office lobbies on the ground floors of properties reduce active frontages and interest on the street”. The creation of inactive ground floor spaces such as large ground floor reception/lobby areas, which tend to accompany new large floorplate buildings will not be supported as they do not create active frontages and erode the diversity and activity that typifies the conservation area.

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.

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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 Forum\(^{31}\) 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 SSPA 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 84\(^{35}\) 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.

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\(^{31}\) Publica Plan for Soho Creative Industries Study June 2018  
\(^{32}\) [https://www.creativeindustriesfederation.com/about](https://www.creativeindustriesfederation.com/about)  
\(^{33}\) Publica Plan for Soho Creative Industries Study June 2018, Page 3  
\(^{34}\) [https://www.artscouncil.org.uk/sites/default/files/download-file/The_value_of_arts_and_culture_to_people_and_society_an_evidence_review.pdf](https://www.artscouncil.org.uk/sites/default/files/download-file/The_value_of_arts_and_culture_to_people_and_society_an_evidence_review.pdf)  
\(^{35}\) Draft City Plan 2019-2040, pages 82-84
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.”

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.”

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”

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.

36 Publica Plan for Soho Creative Industries study June 2018, Page 1
37 Ibid
38 Ibid
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<tr>
<td>12:</td>
<td>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.</td>
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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 2i’s on Old Compton Street onwards. 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”.

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 Scot’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. 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 polices 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 that 3.00 pm.

39 https://en.wikipedia.org/wiki/The_2i%27s_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 caused”.

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 to 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.**
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 economy.\(^\text{42}\) 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.\(^\text{43}\)

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.\(^\text{44}\)

7.5.3 The Soho Neighbourhood Area has been part of a defined stress area in terms of premises licensing policy since 1993.\(^\text{45}\) 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.”\(^\text{46}\) 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...

\(^{43}\) https://www.westminster.gov.uk/statement-licensing-policy\(^\text{WCC Statement of Licensing Policy January 2016, Para 1.6}\)
\(^{44}\) https://www.westminster.gov.uk/noise-strategy\(^\text{Page6}\)
\(^{45}\) https://www.westminster.gov.uk/statement-licensing-policy Appendix 14 Cumulative Impact Policies
\(^{46}\) https://www.westminster.gov.uk/unitary-development-plan-udp\(^\text{WCC Unitary Development Plan 2004 Chapter 8 paragraph 8.84}\)
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 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.

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

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. It is recognised that Soho has amongst the worst air quality in London and vehicular traffic is a major generator of such pollution. This is of high concern to those consulted in our two public consultation surveys. 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.

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

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47 Publica Soho Public Realm Study 2014 Pages 132 and 133
48 City Plan 2019-2040 pages 31 and 32
50 https://www.westminster.gov.uk/sites/default/files/air_quality_manifesto_2018_0.pdf
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 14,15,214,215

32
country to provide alternative methods of transport. Westminster City Council’s Walking Strategy 2017-2027\(^5\) on Page 63 notes that Westminster planning policies encourage car free development and refers to the city having one of the most extensive public transport systems in the world. As set out in the Walking Strategy’s Objective 6, it is important to achieve behaviour change over the life of the Plan.

7.6.5 It is therefore important that new housing provision does not add to the pressure in already intensively used residents’ street parking. On-street residents parking in Zone G is already heavily used\(^5\). Therefore, unless it is parking for special needs in line with the polices of the London Plan. Policy 17 requires planning consent for residential development to contain a condition secured by legal agreement that owners and occupants of new housing that is provided in the area do not have a right to apply for a residents parking permit. But they should be offered the option of belonging to a car club so that they have access to a range of vehicle sizes and types for unavoidable and essential uses.

7.6.6 The removal of the right to apply for on-street residential parking permits can be legally achieved provided Section 16 of the Greater London Council (General Powers) Act 1974 is used rather than by Section 106 agreements\(^5\).

**POLICIES**

<table>
<thead>
<tr>
<th>16: Where to meet Local Plan requirements affordable housing can only be provided ‘in the vicinity’ vicinity in this Plan is defined as within the Soho Neighbourhood Area.</th>
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<tr>
<th>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).</th>
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City of Westminster and NDC 2015 Parking Occupancy Survey pages 20 and 28

\(^5\) [https://www.colmancoyle.com/team/is-a-parking-permit-free-obligation-a-valid-section-106-planning-obligation/](https://www.colmancoyle.com/team/is-a-parking-permit-free-obligation-a-valid-section-106-planning-obligation/)
7.7 HOUSING MIX AND USE

Reasoning

7.7.1 Exceptionally large housing units do not make the best use of the limited available housing space in Soho and should not be permitted. The only exception to this will be where a larger unit is needed to ensure the protection of a heritage asset. Overly large units have been called ‘trophy’ units and can be ones owned and only occupied for brief periods of the year. This is an inefficient use of precious and limited housing space within Soho and should be avoided.

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.
7.8 RESIDENTIAL AMENITY

Reasoning

7.8.1. This Plan notes and welcomes section 7 of the draft City Plan 2019-2040. In the Soho Neighbourhood Area, these ‘neighbourly’ policies can be enhanced by really thorough Construction Management Plans and Delivery and Serving Plans for all major development in accordance with Westminster’s Code of Construction Practice.

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

7.8.3. Development has an important part to play in Soho’s future to allow it to evolve, but multiple developments taking place simultaneously in such a small area impacts on amenity and the desirability of Soho as a destination so any phasing of construction and utility works to reduce this disruption is helpful. Improvements to residential amenity will also be likely to improve amenity for businesses, their employees and visitors.

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

7.8.5. Major development proposals should be accompanied by a clear Delivery Service 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 the use of zero or low

57 https://www.westminster.gov.uk/statement-licensing-policy Appendix 14 Cumulative Impact Policies
58 Aspirations for Soho 2017 survey report - section on general amenity
59 Informal survey by resident Andrew Murray
60 Publica Soho Public Realm Study update 2018
61 https://www.westminster.gov.uk/code-construction-practice
pollution vehicles, freight consolidation, shared delivery arrangements, the timing of deliveries to prevent congestion and last mile delivery modes such as by bicycle and on foot.

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

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

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

POLICIES

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.

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.

63 https://www.westminster.gov.uk/noise-strategy
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 Westminster. 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 GLA 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 GLA and London Councils guidance note “The control of dust and emissions from construction and demolition”.

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

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64 https://www.londonair.org.uk/london/asp/annualmaps.asp
65 https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance-and-practice-notes/control-dust-and
cooling loads and emissions over a much longer period than normal commercial hours. The area is effectively a 'heat island' on top of a 'heat island'\textsuperscript{66}. The GLA Sustainable Design and Construction SPG 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 Retrofitting\textsuperscript{67} 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 structure\textsuperscript{68}. 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.

\textsuperscript{66} https://www.westminster.gov.uk/westminsters-city-plan-strategic-policies Para 5.66 page 155
\textsuperscript{68} https://www.rics.org/uk/upholding-professional-standards/sector-standards/building-surveying/whole-life-carbon-assessment-for-the-built-environment/
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.
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 2041\(^70\). Westminster City Council also seeks to reduce traffic congestion through its Greener City Action Plan\(^71\). Light Van and HGV’s make up 17% of London’s traffic second only to private cars.\(^72\) The Mayor’s Freight Servicing Action Plan\(^73\) 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.

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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.
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 priority. Providing green infrastructure increases the overall sustainability of new development, helps provide habitats, connecting routes for wildlife between the major parks. When such infrastructure is also wholly or partially visible from the public realm it also adds to the sense of health and well-being and makes the 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 proceeded 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 26 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 walls.

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74 https://www.westminster.gov.uk/sites/default/files/city_plan_online.pdf Page 122
75 http://www.wildwestend.london/vision
76 https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/urban-greening
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.
7.12 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 Elisabeth 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. Street 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
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 shows\(^78\). 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.B\(^79\)

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.

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\(^78\) [https://unearthed.greenpeace.org/2018/05/22/green-transport-european-cities-five-charts/](https://unearthed.greenpeace.org/2018/05/22/green-transport-european-cities-five-charts/)

\(^79\) [https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan/chapter-10-transport/policy-t5-cycling](https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan/chapter-10-transport/policy-t5-cycling)
7.14 WASTE AND RECYCLING

Reasoning

7.14.1 Although there is a City of Westminster Municipal Waste Management Strategy 2016 – 2031\(^8\) 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.\(^9\) 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.\(^10\)

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”.\(^11\) Other solutions at varying scales can be achieved by not only providing the correct space and facilities for

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\(^8\) [https://www.westminster.gov.uk/waste-strategy](https://www.westminster.gov.uk/waste-strategy)

\(^9\) Publica Soho Public Realm Study update 2018 pages 10 and 11

\(^10\) [https://www.dropbox.com/s/9ro84koy8n2zpqe/SNF%20Aspirations%20Quant%20Summary.pdf?dl=0](https://www.dropbox.com/s/9ro84koy8n2zpqe/SNF%20Aspirations%20Quant%20Summary.pdf?dl=0)

\(^11\) 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.  

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 food. 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.

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85 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.
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 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.

7.16.2 Ramillies Place/Street are defined in the ORB (Oxford Street, Regent Street and Bond Street) Action Plan produced by TfL, Westminster and the NWEC 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.
## 8. GLOSSARY

<table>
<thead>
<tr>
<th>Term</th>
<th>Description</th>
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<tbody>
<tr>
<td>Affordable Housing</td>
<td>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.</td>
</tr>
<tr>
<td>Asset of Community Value</td>
<td>Land or buildings of local importance, nominated by local community groups. When these assts come up for sale or change of ownership it gives local community groups 6 months to raise money develop a bid before the asset can be sold.</td>
</tr>
<tr>
<td>Car Club</td>
<td>A flexible car hire scheme which provides a cost-effective alternative to personal car ownership.</td>
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<tr>
<td>Central Activities Zone (CAZ)</td>
<td>An area of central London designated by the London Plan.</td>
</tr>
<tr>
<td>City Plan</td>
<td>Westminster’s draft local plan ‘City Plan 2019-2040’ for the City of Westminster.</td>
</tr>
<tr>
<td>Community Infrastructure Levy (CIL)</td>
<td>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.</td>
</tr>
<tr>
<td>Conservation Area</td>
<td>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.</td>
</tr>
<tr>
<td>Consolidation</td>
<td>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.</td>
</tr>
<tr>
<td>Creative Industries</td>
<td>These are industries which are defined in Westminster’s City Plan on page 167 as being creative in content, experience, originality or in service.</td>
</tr>
<tr>
<td>Entertainment Uses</td>
<td>These may be business uses classified in planning terms as A1 cafes, A3, A4, A5 and D2. See glossary entry on ‘use class’.</td>
</tr>
<tr>
<td>Last Mile Delivery</td>
<td>Ways of delivering goods which seek to minimise the use of fossil fuel delivery vehicles.</td>
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<tr>
<td>Major Development</td>
<td>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.</td>
</tr>
<tr>
<td><strong>Micro Consolidation Centre</strong></td>
<td>A building or facility where goods and parcels can be consolidated together to allow clean and low energy distribution of those deliveries.</td>
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<tr>
<td><strong>National Planning Policy Framework (NPPF)</strong></td>
<td>The national planning policy document which sets out the Government’s planning policies for England and how these are expected to be applied.</td>
</tr>
<tr>
<td><strong>Social and Community Uses</strong></td>
<td>These are as defined in WCC planning consultation booklet No7 February 2014.</td>
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<tr>
<td><strong>Soho Special Policy Area</strong></td>
<td>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.</td>
</tr>
<tr>
<td><strong>Substantially Taller Buildings</strong></td>
<td>Are those which are proposed to have a height which is over two additional storeys to that existing.</td>
</tr>
<tr>
<td><strong>Tall Buildings</strong></td>
<td>Are those as defined in the WCC City Plan.</td>
</tr>
<tr>
<td><strong>The Council</strong></td>
<td>An abbreviated name for Westminster City Council.</td>
</tr>
<tr>
<td><strong>Use Class</strong></td>
<td>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.</td>
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</table>