

City Plan 2040 - Consultation

R0064

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To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>

Cc: [REDACTED]

THIS IS AN EXTERNAL EMAIL

Dear Planning Policy Consultations,

As Chief Executive of Creative Land Trust (CLT), I am writing to respond to the City Corporation's consultation on the City Plan 2040. The Trust is a charity operated by an executive team committed to providing lasting solutions to London's studio crisis and supporting the creative economy, and we are governed by a Board of Trustees comprising experts in arts, studio provision, property and finance. Our founders include Mayor of London, Arts Council England and Bloomberg Philanthropies.

Overall, there is a lot of helpful content in the City Plan 2040 and it is particularly encouraging to see the reaffirmed commitment to the Destination City vision. Overall, we would be happy to confirm that we consider the City Plan 2040 to be a sound and legally compliant document.

I would also like to take this opportunity to suggest four specific ways that the City Plan could be further strengthened. These are focused on those areas where CLT has genuine expertise and can speak with authority. Therefore, my suggestions are:

- The summary bullet points on page 95 suggest a very strong focus on cultural consumption, with cultural production only really referenced in point six (and even then, not made explicit). In a City made prosperous through creativity, it seems an oversight to aim the City Plan at importing cultural production rather than bringing it back into the Square Mile and thereby regenerating a mixed economy.
- Point 11 on page 95 is somewhat outdated. There are two main issues driving creative and cultural activities out of the City, which are affordability and precarity. Making the promotion of meanwhile space a headline item ignores the second of those issues, and incidentally also disregards the importance of decanting creatives into new sites when meanwhile buildings are reclaimed by owners/developers. A focus on permanent or at least long-term workspace would be far more relevant to the needs of the cultural sector and the health of the City.
- To be blunt, a policy aimed at resisting the loss of existing creative workspace is not that helpful in a location that has already lost almost all the workspace it once had. We would welcome the promotion of more provision as a far more important endeavour. There is energy behind that provision (see CLT's work to provide studios in Holborn Viaduct) but we require additional policy support from the City.
- It is good to see the intention to provide arts and cultural facilities, as set out on page 100, but the bullet points here could be strengthened with more clarity and detail so that they become more than good intentions. With this in mind, it would be worth setting out concrete ways to use S106 and other planning obligations/conditions to promote the provision of cultural production in new developments.

I do hope that this feedback is useful and we would welcome the opportunity to engage with you further on cultural and creative opportunities in the City of London.

Kind regards,

Gordon Seabright



Gordon Seabright
Chief Executive

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