

Barbican Renewal Project - Representations to City Plan 2040

Ann Norman [REDACTED]

Wed 5/29/2024 2:51 PM

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

Cc: [REDACTED]

2 attachments (356 KB)

Barbican Renewal Project Representations to City Plan 2040.pdf; Barbican Representation Form for City Plan 2040.pdf;

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

Please see attached our representations in response to the Regulation 19 Draft City Plan 2040.

If you could confirm receipt, that would be much appreciated.

Kind regards,
Ann

Ann Norman | Planner

The Planning Lab

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Development Plans Team
Environment Department
City of London Corporation
Guildhall
London
E2P 2EJ

29 May 2024

By email

Dear Planning Policy Team,

Proposed Submission Draft City Plan 2040 Regulation 19 | Consultation response from the Barbican Arts Centre, Silk St, Barbican, London EC2Y 8DS

We are pleased to respond to the consultation on the City of London Corporation's (CoL) new City Plan (Regulation 19), on behalf of our client the Barbican Arts Centre (the Barbican). The Barbican is a dynamic cultural centre in the heart of the City of London. Thousands of different performances, events and exhibitions are presented each year, drawing millions of visitors to the area, creating connections, provoking debate, and reflecting the world we live in.

In summary, the Barbican is broadly supportive of the aims of the CoL's new City Plan and many of its draft policies, including the key objectives - to deliver a vibrant and competitive economy; transformation of the Square Mile into 7-day-a-week cultural and leisure destination; be highly sustainable with net zero Square Mile by 2040; be inclusive and accessible; and celebrate local heritage while reshaping parts of the City that have the most potential for growth and regeneration. These priorities are fully aligned with the ambitions of Barbican Renewal, a transformative programme of capital projects that will enable the Barbican Centre to realise its full potential in contributing to the creative and economic vibrancy of the area, supporting the ambitions of Destination City. We provide detailed responses below on the contents of the draft City Plan.

The Barbican Arts Centre

The City of London Corporation is the founder, principle funder and asset owner of the Barbican Centre, an iconic building of international significance. The Barbican was a visionary post-war project from the City Corporation, built on the largest bomb-damaged area in London by architects Chamberlin, Powell and Bon. Their design resulted in one of London's most ambitious and unique architectural achievements: a city within a city that is raised above street level and draws on a rich palette of references, from ancient Roman fortresses and French Modernism to Mediterranean holidays and Scandinavian design. As a result, in 2001 the Barbican Arts Centre and the wider Barbican estate of which it forms a part, received Grade II listed status. The landscape of the Barbican estate is also designated at Grade II* on the Register of Parks and Gardens, and the estate falls within the Barbican and Golden Lane Conservation Area.

The Barbican Arts Centre is home to two art galleries, two theatres, three cinemas, a concert hall and a tropical conservatory, alongside restaurants, bars, public foyers and outdoor spaces and conferencing facilities. It is widely regarded as one of the world's leading arts centres and most significant post war buildings.

Visits to the Centre total 1.8 million annually, increasing footfall to and spend within the City, particularly across the quieter weekend days. The Barbican is the City's third most visited attraction, generating around £80 million in annual economic value and supporting 1,100 full-time equivalent jobs. It is also a highly valued civic and community asset for City residents and businesses, Londoners and the wider UK.

Over the past two years, the Barbican Renewal Programme has been developing plans and designs for the complete restoration and renovation of the Barbican Arts Centre. This ambitious programme of capital projects will unlock the full potential of the site to act as a creative catalyst for audiences and artists today and in the future, enhancing the quality and flexibility of existing spaces and bringing extensive areas of disused space back into public use for creative programming, catering and leisure activities. It will improve permeability, accessibility, and wayfinding through the site, and make major improvements to the building's environmental performances to reduce carbon emissions and be net zero by 2027. Designs will preserve and respect the complex's original architectural vision and heritage, while adapting it to respond to the creative opportunities and challenges of the future.

The Barbican Arts Centre is therefore particularly interested in the development of the new City Plan as this will guide development in the area over the next 16 years. The Barbican Arts Centre has been working with CoL as part of Barbican Renewal and is supportive of the emerging City Plan.

The Barbican's response to the draft City Plan

Supporting Cultural Facilities | The Barbican is supportive of the draft cultural policies which prioritise the protection and enhancement of existing areas of cultural significance. These areas provide an anchor for cultural regeneration or where a continuing need exists. We note the Smithfield and Barbican area has been identified as a Key Area of Change (KAOC) in Strategic Policy S23, The Barbican is supportive of this allocation, which refers to the Barbican as a cultural quarter and encourages the growth of creative enterprises within these areas through the delivery of meanwhile uses in vacant and under-used premises, as well as the provision of art installations and activity in the public realm. This is reiterated in policy S6 and CV6, with the Barbican noted as a 'strategic night-time location of national or international significance in the London Plan'. In accordance with these policies, as part of bringing underused spaces into use at the Barbican, the Barbican is considering both temporary and permanent new uses to activate redundant spaces and improve vitality across the site. Additionally, a visual arts strategy is being explored and delivered by the Barbican for external public realm spaces, to enhance the Barbican's cultural contribution. A recent successful case study is the Purple Hibiscus installation which took place at the Barbican Art Gallery this year and has driven a significant increase in footfall and profile.

We note policy CV6 states that temporary works of art (under 8 weeks) that don't require planning permission will be considered by the City Arts Initiative (CAI) group; on behalf of our client we would request further clarity on this process and what is involved. One potential area for improvement of this condition is an extension to the length of the temporary period where planning permission is not required. This is because public art interventions tend to require longer runs to maximise public benefit and return on investment, with temporary works often in situ for 3-6 months.

Policy S6 also introduces the City Corporation's Cultural Planning Framework (CPF), which will help contribute to the development of a cultural strategy. We note the CPF identifies the Barbican and Smithfield area as a focal area, and states that it is important to maintain the unique cultural and architectural character, ensure affordable workspace and support existing institutions in need of financial support or additional space. The Barbican supports the encouragement of meanwhile uses, public realm improvements to Beech Street and exploring opportunities to improve the critical east-west route connecting Smithfield, the Barbican Centre and Finsbury Circus. The Barbican also welcomes its identification as a significant cultural institution with an impactful presence. With this in mind and understanding the role our plans will play in delivering the aims of Destination City, we would like to request that support for Barbican Renewal is expressed within the CPF.

We note policy CV2 which requires major developments in the City to submit a Culture and Vibrancy Plan setting out how their development will culturally enrich the Square Mile and that this should be informed by the CPF. This policy also requires large scale development over 10,000 sqm to make an on-site provision of cultural floorspace, while development under this threshold can make a provision of a scale commensurate with the size of the development or provide off-site provision or contributions to facilities and infrastructure. The Barbican supports the principle of policy CV2 to further enhance the arts, culture and leisure facilities in the City, but we would suggest that the approach to development over 10,000sqm could be reconsidered. The Barbican believes there would be a much greater benefit to directing contributions from large scale development to existing facilities in order to maximise and enhance the use of these cultural assets, creating true cultural hubs that are greater than the sum of their parts.

We understand the principle of this policy to support the Destination City vision but believe that small pockets of cultural floorspace in major commercial developments across the City may not provide the most coherent or effective offer. The Barbican considers these spaces may not be attractive or suitable to cultural providers and that the greatest benefits could be delivered via contributions to invest in existing facilities, building on their expertise to create recognised centres of excellence. The Barbican's recommendation would be the pooling of contributions, so these funds can be strategically directed in ways that maximise the overall impact in improving cultural provision in the area. Major opportunities, such as the revitalisation of the currently derelict Exhibition Halls for new cultural uses, demonstrate the kind of impact that could be realised if contributions were deployed strategically and at scale.

The Barbican is home to a wide range of cultural facilities, and is therefore supportive of the cultural policies, the Barbican Listed Building Management Guidelines and CPF, which encourage culture-led mixed-use development, resist the loss of existing visitor, arts and cultural facilities and support the retention and improvement of pedestrian permeability and connectivity.

Energy and Sustainability | The Barbican is supportive of the emerging sustainability policies, such as policy S14 and OS2, which require all proposals to demonstrate the highest feasible level of greening consistent with good design to protect and enhance the City's biodiversity. The encouragement for increased access to existing and new open spaces, which the external spaces in the Barbican are classified as, is also highly supported.

The Barbican supports the new designation for part of the Barbican estate as a Site of Borough Importance for Nature Conservation (SINC), with policy OS3 requiring habitats within SINCs to be retained, protected and enhanced. We note that this designation focusses on the lake and is therefore not expected to impact any of Barbican Renewal works, however, Barbican Renewal will of course consider any impacts, and has at its heart the ambition to increase and enhance green spaces within the Barbican site. Policy OS3 also promotes green corridors and biodiversity links between St Paul's, Postman's Park, Barbican and Islington, and we would value clarity on what is expected from the Barbican in regard to this.

The City Plan's aim to be a net zero carbon City by 2040 aligns with the Barbican's own ambitions as a department of the City Corporation. We note policies HL2 and DE1's requirements for all developments to be at least Air Quality Neutral and for major developments to undertake an assessment of the options, whole life-cycle carbon assessment, and meet a minimum BREEAM 'excellent' rating and NABERS UK rating of 5 stars. We acknowledge these requirements, and the Barbican will consider these in the development of its proposals and plans and seek to address these where applicable. The Barbican wishes to request, however, that flexibility around the appropriateness of BREEAM for development proposals is considered in these policies and that bespoke approaches that are more suitable to large Listed estates are a policy consideration. Like many of the historically significant buildings in the area, the Barbican Arts Centre presents a unique set of challenges and opportunities that demand very particular solutions. Furthermore, the Barbican is supportive of policy IN1 which requires connections to existing decentralised energy networks. The Barbican already meets this requirement through their connection to the Citigen network, which is promoted in policy S23.

The Barbican is also supportive of the 'retrofit first' approach and the need to minimise whole life-cycle carbon. We note policy OS4 supports the national requirement to provide a minimum 10% BNG but also introduces the CoL's requirement for a BNG target score of minimum three biodiversity units per hectare (BU/ha) for major developments and supporting documents (Biodiversity Gain Plan and Habitat Management and Monitoring Plan). We request further information on how this will apply to the Barbican, given the urban nature of the site, and how the BNG target score will link to the mandatory requirement for a 10% BNG.

Overall, the Barbican is supportive of the emerging policies which aim for development to be adaptable to future climate conditions and more environmentally sustainable. The Barbican has no comments on the SPD planning for sustainability at this stage, however it is aware of and will address the requirements as much as is feasible in the emerging Barbican Renewal projects.

Design | The Barbican is supportive of the design policies and their requirement for exemplar standard of design, aesthetics and architectural detail. We also note that policy DE2 states development which adversely affects the character, appearance or amenities of the buildings will be resisted. Furthermore, the Barbican is supportive of policies S1 and HL1 which require inclusive design and management of buildings, streets and public spaces, to create places promoting diversity and social inclusion. These policies align with Barbican Renewal's vision for a world-leading approach to the care and restoration of the iconic buildings, and the creation of a more inclusive and permeable site, and will ensure these principles are prioritised in the Barbican Renewal projects.

Heritage | The emerging heritage policies support the conservation and enhancement of heritage assets and their settings, their sensitive sustainable retrofit and improvements which would benefit climate resilience and adaptation. This again aligns with Barbican Renewal's vision, and the Barbican is therefore highly supportive of these policies. We note a Heritage Impact Assessment will be required and should assess any impacts on the significance of a heritage asset as part of an application submission.

The Barbican also acknowledges that policy HE2 states archaeological features on major development sites must be preserved in-situ and archaeological monuments such as the London Wall, part of which falls within the Barbican estate, must be preserved. The Barbican does not intend to impact these features but will ensure to comply with this policy and provide archaeological assessments for any potential below ground excavation required.

Amenity | Policy CV5 states that new evening/night-time entertainment and the extension of existing premises will only be permitted where there is no unacceptable impact on the amenity of noise-sensitive users and environmental amenity. The Barbican notes that the Barbican estate is an identified residential area, and therefore understands the aims of Policy CV5. The Barbican is an existing active cultural destination and works with local residents to ensure that the amenity of residents is protected from unacceptable disturbance from noise, fumes and smells, and vehicle or pedestrian movements. The Barbican does consider that, given the priority for the Destination City vision, policy CV5 must not unnecessarily restrict the further activation and enhancement of the Barbican. It is also noted that Management Statements will be required. Additionally, the Barbican is supportive of this policy's compliance with the agent of change principle, in regards to new residential development being proposed close to existing evening or night-time uses, and request that this continues to be enforced.

Policy S8 considers lighting as an integral part of the design process, ensuring that internal and external lighting provides the 'right light in the right place at the right time'. This links to policy DE8 which further states light spillage should be avoided beyond where it is needed in order to protect light-sensitive uses and biodiversity, and should be sympathetic to heritage assets. The Barbican supports these policies and will ensure the amenity of light-sensitive uses is protected.

Transport | The Barbican supports the transport policies, such as policy VT1 which requires Transport Assessments, Travel Plans for developments above the established thresholds, and Construction Logistics Plans for major development and any that would have a significant impact on the transport network during construction. We note policy VT2 requires delivery to and servicing of development to take place outside peak pedestrian hours, and for deliveries in residential areas to take place outside the hours of 11pm to 7am on all days of the week. However, as the Barbican estate is mixed-use, comprising of both residential and commercial uses, the Barbican requests that more flexibility on the delivery and servicing times be considered given the complex nature of the site. Additional wording to policy VT2 could include 'flexibility to delivery and servicing arrangements will be considered in unique and exceptional circumstances'.

Policy S10 supports the implementation of key walking routes and improved conditions for safe, convenient and accessible walking, wheeling and cycling, incorporating climate change adaptation, with policy AT1 also promoting walking improvements along Beech Street and Aldersgate Street. Policy S10 further states Healthy Streets Plans will be developed to cover the Bunhill, Barbican and Golden Lane area. The Barbican is supportive of these policies and plans, as they align with Barbican Renewal's vision.

Conclusion


The Barbican is supportive of the policies proposed in the draft Local Plan, however request that suitable flexibility is applied to these policies to ensure that the unique character, nature and operations of the Barbican estate is acknowledged and that the cultural elements of the plan deliver the greatest possible benefits, in order to enable the Barbican to continue to serve the ambitions of the city as an international cultural destination. Moving forward, the Barbican will continue to monitor progress with the draft Plan and request to be kept up to date with the progress.

If you have any questions, please contact Vicky Cartwright on victoria@theplanninglab.com.

Yours sincerely,

The Planning Lab

Model Representation Form for Local Plans

 CITY OF LONDON	Local Plan Publication Stage Representation Form	Ref: Reg 19 (For official use only)
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Name of the Local Plan to which this representation relates:

City Plan 2040

Please return to City of London Corporation BY 11:00PM 31 May 2024

emailing to: planningpolicyconsultations@cityoflondon.gov.uk

Please note that all representations will be made public on our website in line with the Town and Country Planning (Local Planning)(England) Regulations 2012. This will include the name of the person and, where relevant, the organisation making the representation. All other personal information will remain confidential and managed in line with the City Corporation's privacy notice.

For more information on how we collect and process personal information, and your rights in relation to that information, please refer to the Environment Department's privacy notice available at [Environment Department Privacy Notice \(cityoflondon.gov.uk\)](http://cityoflondon.gov.uk) and the City Corporation's privacy notice available at www.cityoflondon.gov.uk/privacy). Please also see our Statement of Representations Procedure available at: City Plan 2040 - City of London.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title

First Name

Last Name

Job Title
(where relevant)

2. Agent's Details (if applicable)

Mrs

Vicky

Cartwright

Organisation (where relevant)	<input type="text"/>	<input type="text" value="The Planning Lab"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value="REDACTED"/>

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input checked="checked" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="checked" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please refer to the submitted representation letter.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to the submitted representation letter.

(Continue on a separate sheet /expand box if necessary)

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

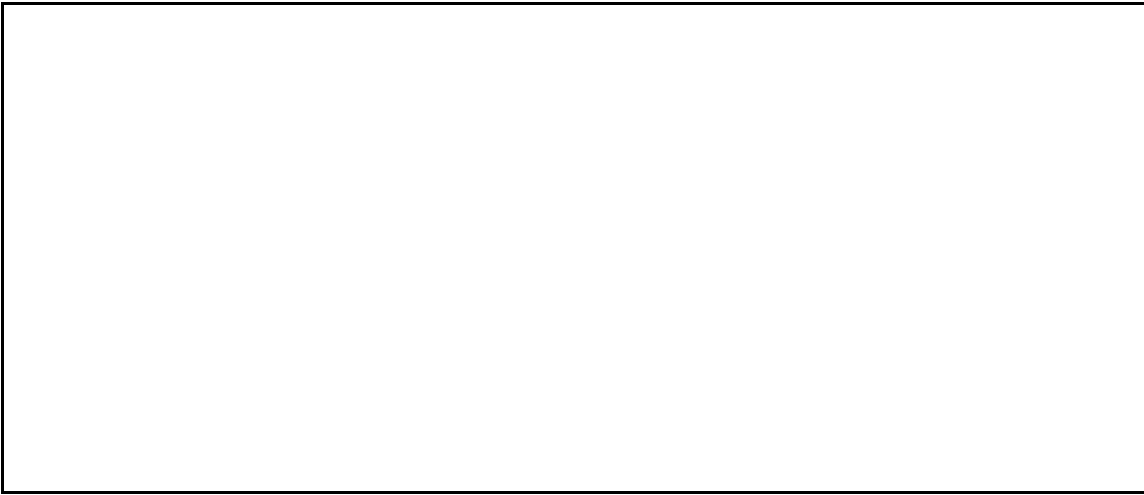
7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:



Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.