

From: Natasha Vydra [REDACTED] on behalf of Kathrin Hersel
Sent: 17 June 2024 15:08
To: Planning Policy Consultations
Subject: Regulation 19 City Plan 2040 Representation – Almacantar
Attachments: City Plan 2024 - Almacantar Response 170624.pdf

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To whom it may concern:

Please find attached Almacantar's representation in response to the Regulation 19 City Plan 2040. We appreciate the opportunity to comment on the evolution of the ambitious City Plan following public consultation in May.

I confirm we are fully supportive of the City Property Association's response which supports in principle the City Corporation's priorities and consider that the draft Plan, with the CPA's proposed amendments and edits, will support the growth and the adaptability of the Square Mile for the plan period. It will also ensure that the City continues to be an enjoyable and thriving place to live, work and visit.

Many thanks

Kathrin

NatashaVydra
PA to Kathrin Hersel and Marketing Team

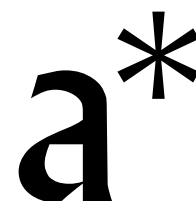
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17th June 2024

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City Plan 2040 Response

I am writing on behalf of Almacantar, investment and development company with interest in Puddle Dock and the Blackfriars Key Area of Change. We appreciate the opportunity to comment on the evolution of the ambitious City Plan following public consultation in May.

Almacantar considers that the draft City Plan 2040 celebrates the City's identity and supports its ambitions. We support the City Corporation's ambition to grow, enabling it to continue to drive economic growth and continue to lead and compete globally as a world-class location for business and leisure, in line with the City Corporation's Destination City vision.

I confirm we are fully supportive of the City Property Association's response which supports in principle the City Corporation's priorities and consider that the draft Plan, with the CPA's proposed amendments and edits, will support the growth and the adaptability of the Square Mile for the plan period. It will also ensure that the City continues to be an enjoyable and thriving place to live, work and visit.

In particular, we support the CPA's suggested amendments to Chapter 7 – Culture and Visitors and Chapter 14 – The Temples, the Thames Policy Area and Key Areas of Change. We support the City's ambitions for an enhanced cultural, leisure and recreational offer however there are several points within the chapters which require clarification or amendment, in our view.

Chapter 7 – Culture and Visitors

Strategic Policy S6: Culture and Visitors

Draft Policy S6 Culture and Visitors, refers to a Culture Planning Framework (CPF), and notes that cultural, leisure and recreational facilities should be in line with the "Culture Planning Framework". Elsewhere there is reference to a "Cultural Planning Framework". As a minor point, we feel that there needs to be consistency in terminology i.e. culture or cultural; that said, the status and details of this Framework is unclear.

We are concerned that the CPF is given weight in the draft Plan, yet the Framework has not been the subject of consultation and scrutiny. Accordingly, it is not considered that cultural proposals should be or can be "in line" with a Framework document that does not form part of the development plan or carry any weight. Further, if any policy seeks alignment with the CPF (following consultation and scrutiny), the policy should be more specific as to which part or parts of the document it is expected to align with.

We note the CPF prepared by Publica and TJ Culture states in its introduction “*it creates an evidence base and set of recommendations that can underpin the production of new planning guidance for culture to be introduced to complement the City Plan 2040*”. The CPF is therefore not a document equivalent to an SPD or guidance and can therefore be given no weight in the decision-making process. We consider that the draft Plan should not reference the CPF in this way and the requirement for applicants or others to have regard to the content of the document is considered unjustified.

A further reference to the CPF is made at paragraph 7.1.5; it references the broad nature of the CPF, and notes that new cultural infrastructure, visitor attractions and complementary facilities will be expected to realise the broad ideas of the Framework. In principle, Almacantar recognises the ambitions of Destination City and is supportive of it, but there is concern with reliance on the CPF in this policy context.

Policy CV2: Provision of Arts, Culture and Leisure Facilities

Almacantar, with the CPA, raises concern with Policy CV2 Provision of Arts, Culture, and Leisure Facilities and does not consider the policy fully justified. Again, there is concern with reliance on the CPF, which is not a policy document of any standing or weight. Whilst the provision of culture as part of major developments is accepted in principle, the basis of this provision needs to be set out with reference to planning policy whether in the Local Plan or other suite of statutory policy documents.

Within part 1 of the draft policy, we are concerned with the reference to “vibrancy” as part of the requirement to submit Culture Plans. Whilst culture is defined by reference to Destination City earlier in the draft Plan, reference to vibrancy is not, and it is not clear how vibrancy is defined or what is expected in respect of the “vibrancy” element of such a Plan. We suggest that reference to vibrancy is omitted. Again, the reference to the CPF is a concern within part 1 of this policy, given the status of this document. It is suggested that part 1 of the policy is amended as follows “***Requiring major developments to submit Culture and Vibrancy Plans setting out how their development will culturally enrich the Square Mile, informed by the City Corporation’s Cultural Planning Framework (CPF)***”.

Within part 2 of Policy CV2, Almacantar accepts in principle the proposed policy requirement to submit a Culture Plan for major developments over 10,000 sqm, however, the policy should be proportionate to the development scale and floorspace area uplift. It would be unreasonable, for example, for an existing building of circa 10,000 sqm proposing a 1,000 sqm extension to provide a Cultural Plan. The policy should be applied with respect to potential area uplift, and not total area. This approach would ensure consistency with how application schemes are assessed, and planning obligations applied and would ensure that retrofit/refurbishment schemes of scale are not unduly burdened.

There is concern with part 3 of the policy, and the requirement for major developments below 10,000 sqm to make provision for arts, culture or leisure facilities. Again, the CPA considers that provision of such facilities should be related to floorspace uplift and not total floorspace. It would be unreasonable, for example, for major developments including COU, retrofit and refurbishment, and refurbishment and extension, to make provision for such on-site or off-site facilities. The draft policy needs to fully acknowledge proportionality in respect of any cultural provision being sought. There is also concern regarding reference to off-site provision or contributions, as no detail is set out. This detail cannot be left to a non-statutory Framework or SPD.

The suggestion of and limited details on a financial contribution is not justified and is not open to robust review and scrutiny. We note there are brief suggestions of this approach in the CPF, but detail is limited and the CPF has no policy status. There is also concern that such provision does not have regard to the viability of development. It may not be viable to provide culture on all major developments, but also that it might not necessarily be appropriate within all major developments. This needs to be recognised in the policy.

Accordingly, we would welcome further discussion with officers around the potential to pooling of contributions, noted in supporting paragraph 7.3.5. There is no policy detail or basis for a financial contribution and the details set out in the CPF are unclear and confusing and need to be the subject of scrutiny. Almacantar is also concerned to note that the viability assessment submitted as part of the evidence base states *“In the emerging Plan, the Council intends to seek financial contributions or on-site culture. We have tested a range of contributions per sq m GIA, as follows: ■ £40 ■ £60 ■ £90 ■ £120 ■ £150 ■ £180”*. There is no clear basis for these assessed contributions, or clarity on how the contributions would be allocated, and the ‘formula’ set out in the CPF appears arbitrary and without explanation. We are also concerned by the analysis set out in the BNP Paribas Viability Assessment and the wide-ranging cultural contributions considered, which are not referenced elsewhere in the draft Plan or justified.

Overall, along with the CPA, Almacantar seeks clarity on this draft policy and would welcome further discussions with officers on the proposed wording of policy CV2 to ensure it is found to be sound.

Almacantar considers it unreasonable to expect applicants to “provide robust management plan for operational and management arrangements at the pre-application stage” as set out at paragraph 7.3.4. Cultural operators are often not able to commit to projects at planning stage (let alone pre-application stage). This requirement is considered unworkable, and we consider that planning conditions are appropriate mechanisms to secure management plans. In many instances, operational and management details will not be known at the early stage of a project, and developers and applicants are not necessarily experts in this field to provide sufficient detail at this stage. The supporting text should be reviewed and updated accordingly. The position is no different to that outlined at paragraph 7.6.10, which recognises that only an outline Management Statement can be submitted in respect of nighttime entertainment, “when details of the end use operator are not known”.

Additionally, the supporting text should acknowledge and provide flexibility in relation to operation and management details. Cultural operators are not often able to make very early commitments to accommodation and space given the lead in periods associated with major development projects. Accordingly, details relating to operation and management can rarely be provided at the application stage. The provision of cultural space is no different to office and retail space where end user tenants and operators are not known at the application stage. Pre-lets are often unusual prior to commencement of development and the situation is no different for cultural operators, although arguably the situation is even more uncertain, as cultural operators are often not able to make medium-to longer-term funding decisions.

Chapter 14 – The Temples, the Thames Policy Area and the Key Areas of Change

Strategic Policy S18: Blackfriars

Paragraph 14.3.0 states that *“the area has a rich history including Dominican monastery and Blackfriars Theatres and likely archaeological remains, including those relating to Baynard’s Castle,*

which should be celebrated and better revealed as part of redevelopment". However, it is not clear what is meant by "*better revealed*" and additional clarity should be provided.

I thank you for considering our feedback.

Yours sincerely,

Kathrin Hersel
Executive Director

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