



City of London Corporation
City Plan 2040 — Examination in Public
Matters Statement

Main Matter 6: Culture and Visitors

6.1 Are the policies relating to Culture & Visitors justified by appropriate available evidence, having regard to national guidance and local context; and are they in ‘general conformity’ with the LP?

The policies relating to Culture & Visitors are justified by appropriate available evidence and have been drafted with regard to national guidance and the local context. The chapter is in general conformity with the LP, drawing on and developing where appropriate LP policies HC5, HC6, E10, SD4, and SD8.

The policies in chapter seven are justified by two comprehensive pieces of evidence: the Cultural Planning Framework (CPF) (ED-CAV2) provides a detailed analysis of the City’s current cultural infrastructure, and the Visitor Accommodation Needs Study (ED-CAV1) forecasts the demand for hotel rooms up to 2037. Together these two documents show a strong understanding of the City’s unique cultural offer and are the foundation for the policies contained in this chapter. Additionally, one of the City Corporation’s six corporate objectives is to create a ‘Vibrant Thriving Destination’ (City of London Corporate Plan 2024-2029, page 50-55). The adoption of the CP, and the Culture and Visitors policies within it, is one way in which this objective will be delivered, as these policies will deliver cultural attractions in new development to make the City a thriving seven day a week destination (see Corporate Plan p54).

The City Corporation is the only local planning authority to be completely within the LP Central Activities Zone (CAZ) (see Policies SD4 and SD5 of the LP). This unique situation structures the CP’s approach to culture and visitors, with a general assumption that ‘main town centre’ uses are appropriate anywhere within the City. As LP paragraph 2.4.3 says, the CAZ is:

‘one of the world’s most attractive and competitive business locations. It accommodates one third of London’s jobs and generates almost 10 per cent of the UK’s output. It contains the seat of national Government and is internationally renowned for its culture, night-time economy, tourism, shopping and heritage’

This requires, as paragraph 2.4.2 of the LP notes, *‘different or tailored approaches to the application of national policy to address its distinct circumstances.’* LP policy SD8 defines the town centre hierarchy for London as per NPPF paragraph 90(a), and the CP contains policies to enhance the relevant strategic functions of the CAZ. These are listed at LP paragraph 2.4.4, with the two most relevant for this chapter being parts ‘c’ and ‘h’:

- nationally and internationally significant agglomerations of offices;
- arts, culture, leisure, entertainment and activities and areas of regional, national and international importance.

One of the attractions of the City as an office location is its proximity to cultural activities and the delivery of City Corporation’s corporate objective ‘Vibrant Thriving Destination’ will support this. The Culture and Visitors policies are drafted in this context to enhance the CAZ’s strategic functions, and more generally to align with the overarching requirement at paragraph 90 of the NPPF that policies *‘support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation’*.

As part of the CAZ, the City is a nationally important location for globally-oriented financial and business services (LP paragraph 2.4.7) and also home to a specialist cluster of cultural activity at the Barbican (LP paragraph 2.4.11). Through the use of three data sets (two from the City Corporation, one from the GLA), the CPF maps the City’s existing cultural infrastructure to produce nine ‘focal areas’ which have distinct characters, strengths and opportunities. The mapping process involved the standardisation of the three data sets, field surveys and additional data gathering through Open Street Maps, and then geotagging every entry to produce shape file. For further information see page 16 and 17 of the CPF.

The mapping in the CPF, and the guidance it gives for each focal area, is appropriate to justify several of the chapter’s policies (S6, CV1, CV2, CV3, CV5, CV6). The CPF maps (page 13) the existing cultural ecosystem to show that there is a significant range of cultural facilities that should be protected (CV1). It identifies (at page 21 and 25) that there are many tourist attractions and spaces of cultural consumption across the City, and therefore visitor facilities should be provided (CV3 and CV6). It shows (at page 24) how widespread evening and nighttime uses are, and so these uses should continue to be supported, in line with the expectations of the CAZ (CV5).

The mapping and focal area analysis in the CPF also justifies the requirement in policy CV2 for major development to provide a cultural contribution, as it shows that in every area of the City there are opportunities for the creation or enhancement of cultural infrastructure, and leisure, recreation and visitor facilities. For example, page 38 identifies that Liverpool Street can expand on the network of independent galleries in the neighbouring Shoreditch/Brick Lane area, and that the night-time economy can be supported by a ‘*diverse mix of shops, bars and restaurants*’ and ‘*publicly accessible toilets*’. Therefore, CV2’s requirement for a cultural contribution is supported by evidence that shows there is scope across the City for an applicant’s cultural contribution to make a positive impact in a specific, targeted and defined manner, despite the general requirement of the policy.

Furthermore, LP policy SD4(e) identifies that the CAZ has a ‘*unique concentration of cultural, arts, entertainment, night-time economy and tourism functions that should be promoted and enhanced.*’ LP policy HC5(a) states boroughs should ‘*develop an understanding of the existing cultural offer*’ to protect existing culture venues, support the development of new venues, and promote local or strategic cultural clusters. Policies CV1 and CV2 directly respond to LP policy HC5 by setting a presumption against the loss of cultural facilities and requiring major development to include a cultural contribution, in accordance with the CAZ vision expressed at LP policy SD4(e). The mapping and focal area analysis in the CPF clearly demonstrates a comprehensive understanding of the existing cultural offer, in line with LP policy HC5(a), and showcases how the policies have been informed by the local context, such as at CV2(4) where there is explicit support for cultural activities in historic buildings, or at paragraph 7.3.3 where it is noted that cultural activities can be incorporated into sky gardens and viewing galleries.

Policy CV3 is also directly informed by an understanding of the local context as shown by page 25 of the CPF. The City and its immediate surroundings attract a large number of tourists due its iconic status as the historic heart of London, exemplified by St Paul’s Cathedral, Tate Modern and the Tower of London. It also has a specialist cluster of cultural activity at the Barbican that is due to expand with the opening of the Museum of London at Smithfield in 2027. The City requires the appropriate facilities to accommodate the tourists these attractions draw, and therefore policy

CV3(1-7) expects new development to provide seats, wayfinding, public toilets and the other necessary facilities to accommodate tourists and visitors.

Hotels are another part of the overall cultural ecosystem and policy CV4 supports the development of well-designed hotels in appropriate locations. The supporting text (7.5.0) of policy CV4 identifies a need of 4,012 additional hotel bedrooms by 2037, which is taken from the model in the Visitor Accommodation Needs Study (VANS) (ED-CAV1). The study models that if the current pipeline is fully built out by 2030, the following years will have a demand for an additional 350 rooms per year to keep room occupancy at the historic level of 80% (VANS paragraph 7.7). Paragraph 7.6 of the VANS identifies the dual role of the City as a business hub and tourist destination as the key demand drivers that will fuel hotel growth over the plan period and assumes from 2025 onwards annual demand growth will be 3.2%.

The inclusion of the need figure in the supporting text is in line with the requirement in LP policy E10(c) that a *'sufficient supply and range of serviced accommodation should be maintained'*, particularly because the figure is flexible to allow a range of hotel types to meet the need (traditional hotels, serviced apartments, apart-hotels). The 350 rooms per annum will make an appropriate and proportionate contribution to the 2,230 rooms per annum identified at 6.10.2 of the LP, given the City accounts for approximately 9% of the total supply across the neighbouring boroughs and most hotel development will be concentrated in the centre of London (see VANS table 2.8).

6.2 Are Policies S6 and CV1 to CV6 positively prepared ‘in a way that is aspirational but deliverable’?

The culture and visitors policies are positively prepared as they constitute a step change in the approach to cultural provision in the City and form a delivery mechanism for the Corporate Plan objective ‘Vibrant Thriving City’. Policy S6 sets out the aspiration for an enhanced cultural ecosystem that draws people across the day and the week, with new cultural facilities, heritage based placemaking, a vibrant evening economy, and a comfortable and pleasant public realm. These aspirations are woven throughout the non-strategic policies, however many hang off policy CV2 as it is through the requirement for cultural contributions that the new cultural infrastructure and visitor facilities will be delivered.

Policy CV2 is explicitly aspirational in its requirement for all major development to make a cultural contribution, and for development over 10,000sqm to make this contribution spatially (on-site). Historically, the City Corporation have negotiated cultural spaces on a case by case basis. In the period 2019 – 2022 the City Corporation permitted, or resolved to grant permission to, 30 developments over 10,000sqm and within these there were: two exhibition and education spaces, one museum, one learning space, and one community space. In total 17% of the developments that would be captured by the on-site requirements of CV2 included some form of cultural contribution on site. Additionally, 11, or 37%, of these applications included publicly accessible elevated spaces. It is likely that a publicly accessible elevated space on its own would not count as a ‘cultural contribution’ for the purposes of policy CV2, however, many of these spaces may have a cultural element attached to them. Paragraph 7.3.3 is clear that cultural uses could be integrated ‘*into new public spaces, including roof gardens and viewing galleries*’.

Based on the historic trend, there is scope for the City’s cultural offer to build on the successful delivery of publicly accessible elevated spaces to create new, explicitly cultural spaces, some of which could be located within new publicly accessible elevated spaces. Publicly accessible elevated spaces will remain important, particularly in the tallest buildings, but policy CV2 will bring about a step change in the delivery of expressly cultural spaces.

The draft policy has already had an impact, as since 2023 the City has permitted an impressive range of new cultural spaces. The City Corporation has permitted, or resolved to grant permission to, 25 developments over the 10,000sqm threshold, and a cultural contribution is included on site in 84% of them. These include curated exhibition spaces in viewing galleries (1 Undershaft partnered with the London Museum), an event space and gallery in a listed building connected to studio/maker space (55 Old Broad Street), the Migration Museum in the basement of a block of student housing (Friary Court), and a new five storey cultural hub (99 Bishopsgate).

The data shows that the policy, even in draft form, is deliverable; it has already begun to diversify the range of cultural spaces applicants propose and increase the number of applications that include space on site. This is because policy CV2 uses a wide definition of ‘culture’ (see paragraph 7.3.3) which aids deliverability as applicants have the freedom to design an offer that fits the site, works with their vision, aligns with the City’s wider cultural landscape, and is viable. Policy CV2 also expects cultural contributions to be ‘informed’ by the Cultural Planning framework, which will help applicants to create an offer that fits in with the City’s wider cultural landscape as the CPF lays this out in detail.

Furthermore, the approach in policy CV2 is already embedded in the planning process and applicants have begun to factor this into their designs. The City Corporation will produce a Culture SPD (see PC 36 of LD22) to give applicants further guidance and to formalise the process of developing and securing a cultural contribution, both of which will aid deliverability. Overall, the successes of the draft policy in the past two years vindicates the analysis in the viability assessment that shows a 'good' (£40/sqm) cultural contribution would have a very minor impact (1.6% reduction in residual land value) on scheme viability (ED-IMP1 paragraph 6.28). See Culture and Visitors Explanatory Note (LD25) paragraph 5.4.1.3 for further discussion.

The policy also includes flexibility for major proposals under 10,000sqm by allowing for off-site provision and financial payments. The threshold for on site delivery is set at 10,000sqm gross floorspace, not net uplift, due to the aspiration for pan-City cultural provision. As explained at 5.4.1 of the Explanatory Note (LD25), the retrofit first approach in the CP will mean many developments may not include much uplift in floorspace but would still be significant developments that produce best in class office space, and therefore should make a cultural contribution. Additionally, a purely retrofit application would not create new floorspace and so would not be captured by the policy as it would not be major development. An uplift only threshold would also concentrate on site cultural contributions in specific areas of the City, in opposition to the pan-City vision for culture laid out in policy S6.

Policy CV4 is positively drafted and includes a clear expression of hotel need over the plan period. New hotels will be permitted, subject to the criteria laid out in the policy, and policy OF2 introduces a new pathway for hotel development, as part of the plan's retrofit first approach. All three of these elements – positive drafting, clear expression of need, new delivery pathway – amount to a deliverable policy with a clear goal.

The remaining policies (CV3, CV5, CV6) support the delivery of the overall aspiration laid out in S6. They do this by setting out the City's aim for the ancillary facilities (visitor facilities in CV3, nighttime and evening uses in CV5, and public art in CV6) that support the cultural infrastructure that will be protected and delivered by policies CV1 and CV2. All three policies are positively drafted to encourage the delivery of these features, and it is clear the CP will enthusiastically support a development that encompasses them. Moreover, many of these features, such as signage and wayfinding CV3(5), animation of key routes CV3(6), seating and/or shelter CV3(1)+(3), and public art CV6, are incorporated into proposals by applicants as they recognise the value they give to the developments in a context in which there is a 'flight to quality'.

6.3 Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?

The policies in chapter seven are clearly defined and unambiguous, and provide decision makers with the appropriate guidance to enable them to make consistent decisions. The chapter starts with a strategic policy that gives an overarching summary of all that is expected by the non-strategic policies in the chapter, and each policy is clearly set in a policy text box, with the supporting text split into two sections: ‘Reason for the policy’ and ‘How the policy works’.

Policy S6 sets the strategic framework for the chapter to provide decision makers with a vision of what the CP seeks to achieve with regard to culture and visitors. The first paragraph clearly outlines that the policies capture a wide range of cultural, leisure, recreation, visitor experiences, evening, and night time activities to ‘*position the Square Mile as a key cultural and leisure destination*’. It then lays out, through eleven parts, ways in which this could be achieved, which gives the appropriate strategic guidance to decision makers. Of particular significance is part two, as it directs the development of new cultural facilities towards the recommendations in the CPF¹. This provides clear, locationally specific guidance to decision makers about the type of new cultural facilities that should be expected across the City, and thus aids them when reacting to proposals, specifically when applying policy CV2.

Policies CV1 and CV2 work together to deliver on the strategic aspiration detailed in policy S12. They do this through a simple, legible, and familiar framework that sets a presumption against the loss of visitor, arts, and cultural facilities. Part 1 of CV1 contains three explicit scenarios where a loss of a facility may be acceptable and the applicability of these scenarios is binary; it is clear if a development proposals meets any one of the three criteria in part 1. Part 2 reiterates the requirement for marketing evidence, with a natural reading of the policy clearly showing that marketing evidence is not required if replacement facilities are provided.

The requirement for replacement provision, or marketing evidence if a loss is proposed, is a standard policy approach used by many local planning authorities to protect a variety of uses (social infrastructure, cultural facilities, sports facilities, public houses etc) and decision makers and applicants are familiar with the process. Paragraph 7.2.2 provides additional guidance on the marketing details that are expected, with an assumption that these will be agreed on a case by case basis through the pre-application process.

While policy CV2 introduces more of an aspirational requirement for new cultural facilities, it is equally clear and unambiguous. Part 1 is an unambiguous, mandatory requirement for all major development and again points towards the CPF as a guide for what to include in a Culture and Vibrancy Plan. Part 2 is also explicitly drafted to require all development of 10,000sqm or more to provide their cultural contribution on site; again, another clear judgement for a decision maker to make. Several regulation 20 representations assumed that this part will only apply to schemes with over 10,000sqm of new floorspace. This is not what the policy text says and it is suggested that this assumption is conflated with the criticism of the threshold addressed in question 6.2 and at 5.4.1 of the Culture and Visitors Explanatory note (LD25).

¹ See paragraph 5.2 of the Culture and Visitors Explanatory Note (LD25) for a discussion of the status of the CPF

Part 3 of policy CV2 introduces flexibility in that it allows for developments below 10,000sqm to make a cultural contribution ‘*commensurate with the size of development*’ on-site, or off-site through a financial payment. Nonetheless, it remains clear and unambiguous for decision makers as it includes additional text to clarify that on-site ‘*will be preferred, with off-site provision only being appropriate where a specific project has been identified through partnership working*’ (Policy CV3(3)). While the increased flexibility gives more responsibility to the decision makers, this is necessary to allow smaller developments the scope to design a cultural contribution that is viable and operationally functional. Further guidance will be provided through the new Culture SPD and an update to the Planning Obligations SPD.

Regulation 20 representations identified that the chapter uses several different phrases to refer to ‘culture’. ‘Culture’ is difficult to define, and the use of several different phrases could be seen to introduce unnecessary ambiguity. As a result, a set of changes (PC35 – 45, of LD26) have been proposed to consolidate the language across the chapter (see paragraph 5.1 of the Explanatory Note). These changes would further aid legibility by consistently defining the types of facilities that the policies, particularly CV1 and CV2, would apply to.

Policy CV4 is plainly drafted with a list of eight criteria that a decision maker can use to react to a hotel proposal. The first sentence clearly identifies that the policy applies to ‘*hotels and other visitor accommodation*’. The total need for new hotel bedrooms is included at paragraph 7.5.0 but is not explicitly identified in the policy text. This is due to the sensitive relationship between office and hotel use across the City, as hotel proposals are often a conversion of older office stock. The CP is supportive of conversion in the appropriate scenarios as set out in policy OF2, although loss of office to hotels will be monitored to ensure the delivery of the office target. Therefore, the current hotel target has not been enshrined in the policy text as it may be adjusted to facilitate the overarching strategic objective of office delivery.

Policies CV3, CV5, and CV6 are more specific policies that provide clear guidance to decision makers regarding wider visitor facilities, the night time economy, and public art. At paragraph 5.5 and the Culture and Visitors Explanatory note (LD25) sets out how decision makers are expected to respond to adverse impacts of development with respect to hotels (CV4) and the Agent of Change principle more widely (CV5). It also sets out at paragraph 5.6 how the language of policy CV6 could be made more inclusive.