

Cultural Planning Framework City of London Report

ED-CAV4

Part 2

Formula recommendations and Cultural Plans

JANUARY 2024

Publica

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The Cultural Planning Framework

OVERVIEW

In April 2023, Publica and TJ Culture were appointed by the City of London to develop a Cultural Planning Framework (CPF), a mechanism to define and control the cultural provision of a development. The CPF has been developed as a cross-departmental project to enable the City Corporation to use its planning system to better orchestrate how culture is delivered across the Square Mile by developers of major schemes (>1,000 sqm). The CPF seeks to establish a fair system that is controllable and defensible, with enough flexibility to allow space for developers to develop their approach towards cultural contribution.

The CPF is not a cultural strategy for the City of London but contains elements that might usefully contribute to the development of a cultural strategy in the future. It has not been designed to suggest a City-wide cultural vision or objectives, nor does it propose a timeline for recommended cultural actions. While proactively concerned with putting procedures in place, establishing benchmarks and lifting the quality of practice, the CPF is aimed at developer-led activity on major schemes to deliver the outcomes envisaged.

The CPF 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. Data and content developed by the CPF has the potential to contribute towards any future cultural strategy that the City Corporation may produce in the future. The CPF provides:

- a researched spatial/cultural framework;
- guidance to planning officers about what is required from the process, including Culture and Vibrancy Plans and financial contributions;
- clarity and good practice guidance to developers;
- a system for capturing impact and value.

About the project

THE PROBLEM

While we recognise culture is important in renewing the City's offer as a destination for workers, visitors and residents, **we currently don't know what we want Cultural Plans to contain, and we don't know what kinds of cultural uses and activities we want to encourage, and where.**

THE RISK

The risk is to be **delivering spaces which are not fit for purpose and the missed opportunity of external investment** into something of real value to meet the objectives of the City Corporation taskforce reports, including the Lord Mayor's Culture and Commerce Taskforce.

THE GOAL

Providing City **planning officers and developers** with **clear details of the cultural deliverables** we expect to secure through our planning system **in support of Destination City.**

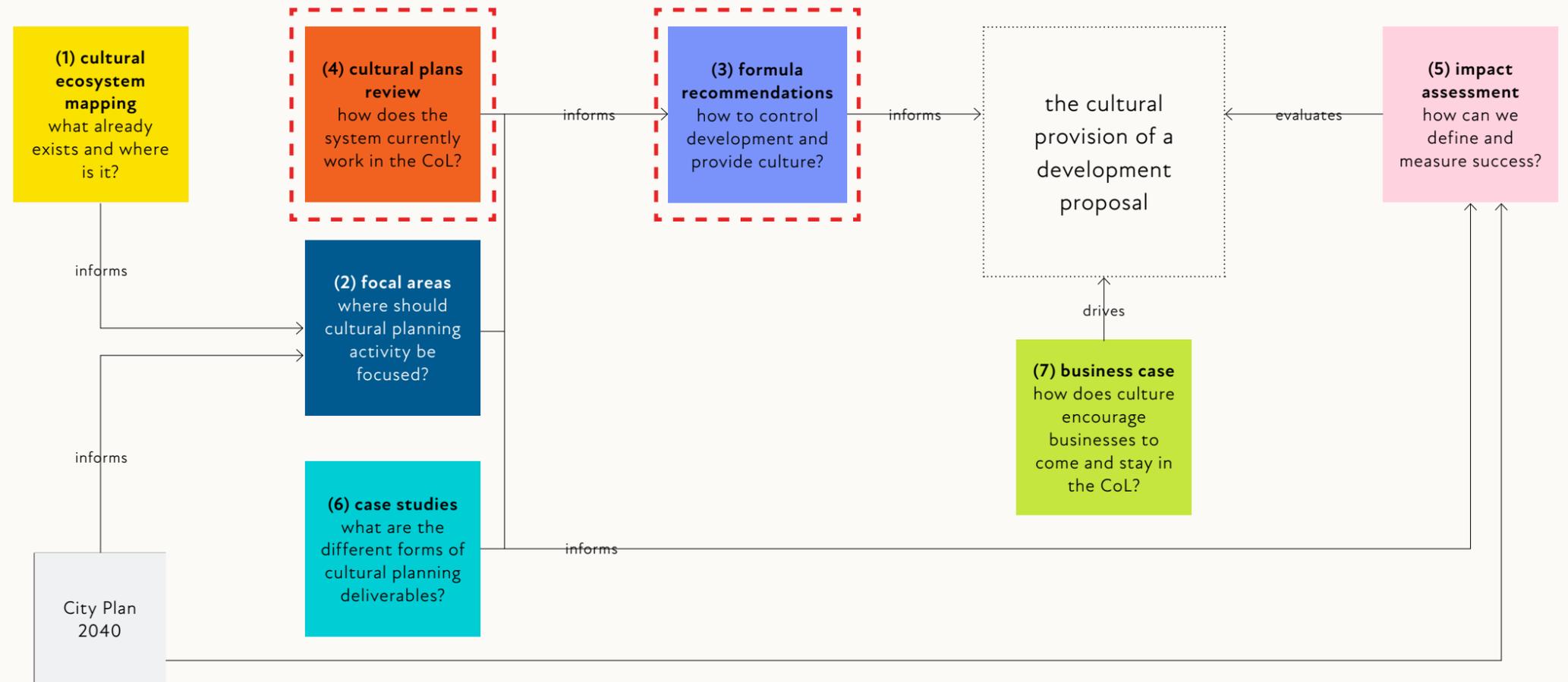
The Cultural Planning Framework

WORKSTREAMS

The CPF has been developed based on the following components:

1. Creation of a digital **Cultural Ecosystem Mapping** that locate cultural assets and ‘cultural contributors’.
2. **Focal Areas** and ‘Cultural Character Plans’ for the City’s diverse neighbourhoods identifying how cultural planning can support the cultural development of each area.
3. A recommended **formula** to enable negotiations with developers around cultural contributions to be made within a fair and consistent framework.
4. Recommendations as to the structure and components of **Cultural Plans** that the City Corporation will require in the future.
5. Proposal of a light touch monitoring system to enable measurement and analysis of the **impact** of cultural planning in the City.
6. Provision of **case studies** that demonstrate quality and a directory of links to good practice in cultural planning.
7. Engagement with developers to strengthen the **business case** for cultural planning and to ensure that this approach supports industry perceptions of the need to invest in culture to support commercial interests and ESG agendas.

This report focuses on workstreams 3 and 4. Workstreams 1, 2 and 5-7 are discussed in accompanying reports Parts 1 and 3.



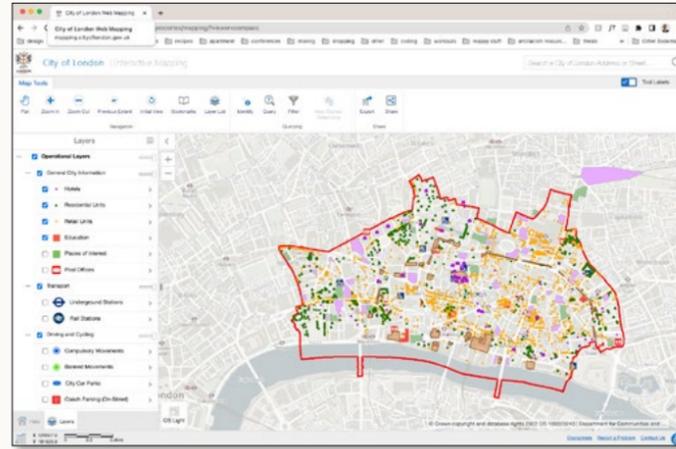
Cultural Planning Framework outputs

TOOLS FOR OFFICERS AND DEVELOPERS

A series of tools has been developed to support both officers and developers in their negotiations of cultural contributions:

1. a thorough and detailed mapping of the Square Mile's assets nearing completion with data amassed for inclusion in the CityMaps online platform and in Compass, the Planning Division's tool used to inform planning application negotiations.
2. Cultural Character Plans for nine areas that cover the entire Square Mile, and include detailed notes on existing cultural offer, forces of change, priorities for future developments, and suggested cultural contributions tailored to each area.
3. research and development of detailed formula intended to guide the scale of cultural contribution and to be applied to developer negotiations within a demonstrably fair and consistent framework.

Cultural mapping



Focal areas and cultural character plans



Page 1: overview and existing cultural ecosystem



Page 2: opportunities and priorities

Formula



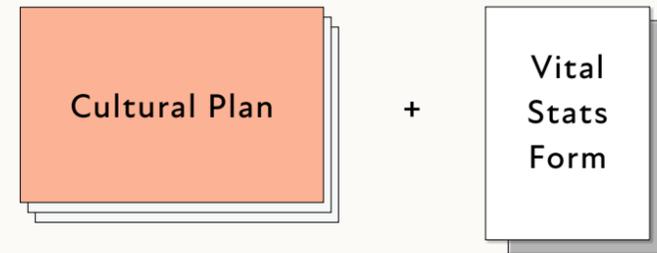
Cultural Planning Framework outputs

TOOLS FOR OFFICERS AND DEVELOPERS

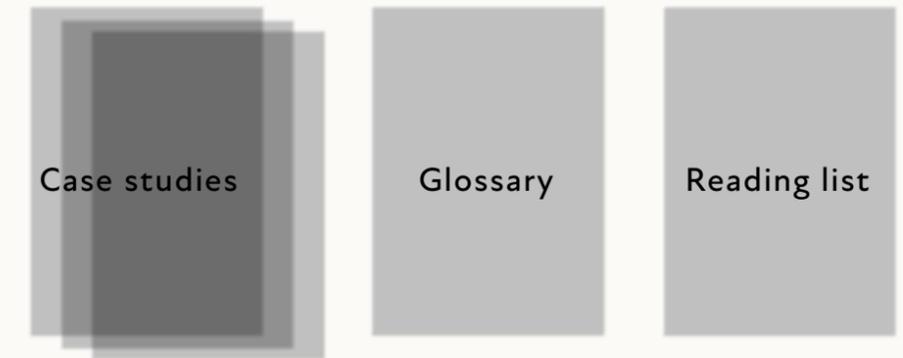
A series of tools has been developed to support both officers and developers in their negotiations of cultural contributions:

4. recommendations regarding structure and components of Cultural Plans based on an analysis of 20 Cultural Plans submitted to the City Corporation by developers since 2020.
5. compelling examples of spatial contributions in commercial development projects from around the world, together with a short glossary and recommended reading list.
6. outline information on the impact measurement model which combines with existing and planned Destination City and City planning data collection procedures.
7. feedback from developers and planning agents that broadly recognises this agenda and provides further steer on how to make any new City Corporation policies and processes clear and helpful.

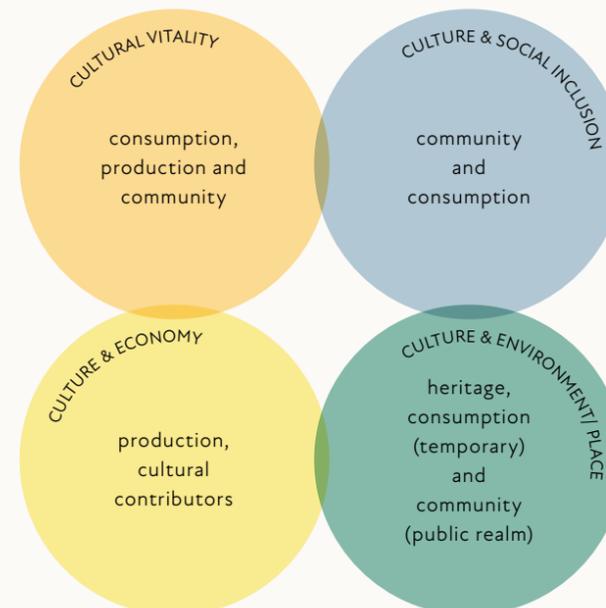
Content and structure of cultural documents for planning submission



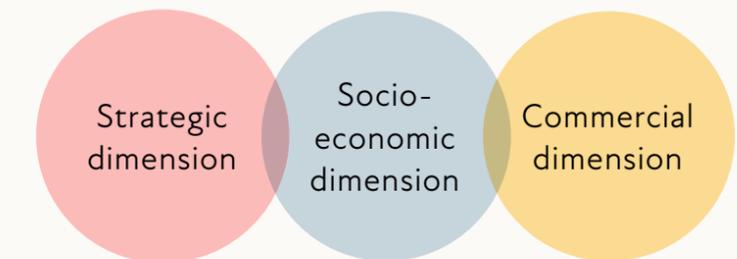
Case studies



Impacts measurement framework

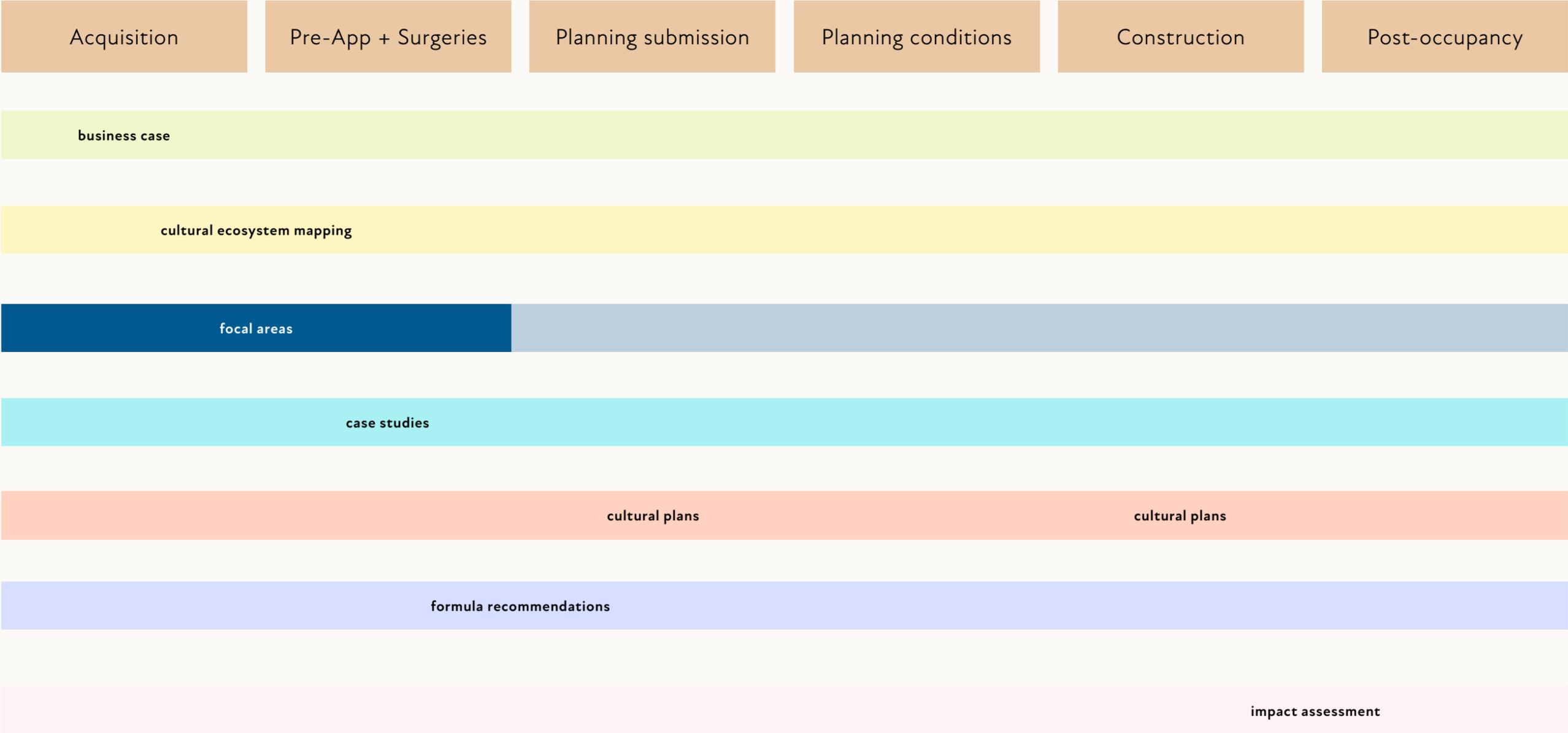


Business case and takeaways from developer conversations



CPF alongside the planning process

TOOLS TO BE USED TO ENSURE A STRUCTURED, PRODUCTIVE, AND DEFENSIBLE PROCESS



03

Formula recommendations

Establishing a formula to control cultural contributions of developments

- 1 Final outputs: Final recommendations and summary matrix
- 2 Process and methodology
- 3 Recommendations

01 Final outputs

FINAL RECOMMENDATIONS AND
SUMMARY MATRIX

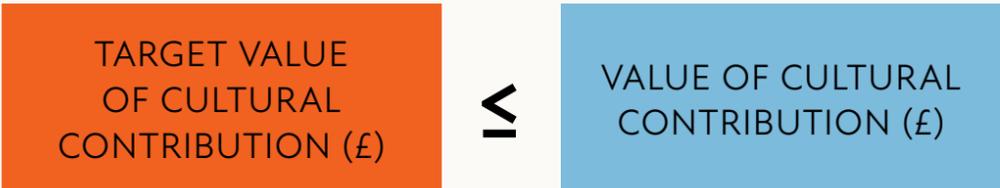
Recommendation: a cultural contribution target applied to projects within set tiers

All developments in the City of London, regardless of size, are expected to contribute to the City’s cultural ecosystem in line with the equation below.

A target for the value of this cultural contribution is set based on the scale of the building (in sqm), which is multiplied by a monetary amount and then a percentage. The target for cultural contribution is calculated by multiplying a Pound amount by the building’s total GIA.

The value of the cultural contribution is the sum of the financial contribution and the value of the spatial contribution, which is calculated in one of two ways (construction cost or rental value).

The target-based approach to determining scale of cultural contribution ensures that spatial contributions are incentivised and their value adequately captured. Moreover, it ensures that larger buildings, which have more room in their viability numbers, contribute accordingly. Requiring every development to contribute spatially (i.e. on-site) may result in many, small-scale, low-quality spaces in locations that not be well-suited for such ground floor uses. It also allows developers to contribute in the ways that make the most sense with their values and the specifics of their project.



Developments of different scales should be encouraged to meet the target through different means. These suggestions come from interviews with developers, as well as a qualitative and quantitative analysis of developments across the Square Mile from 2020 - 2023, and an initial viability assessment.

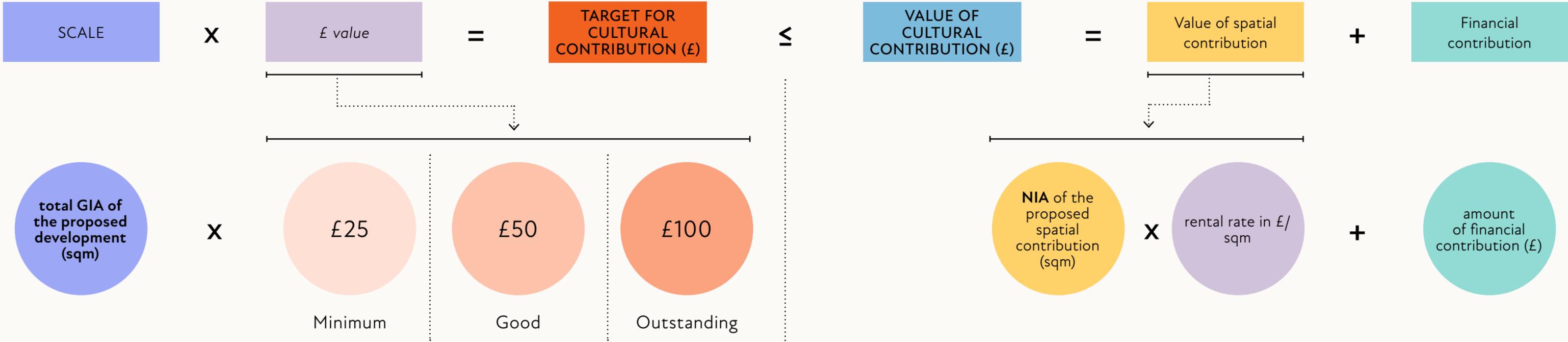
small scale	medium scale	large scale
1,000 - 10,000 sqm	10,000 - 60,000 sqm	60,000 sqm+

Planners should encourage developments between 1,000 - 10,000sqm to explore opportunities for compelling spatial contributions in line with focal area guidance, particularly from schemes toward the upper end of the scale range (e.g. schemes approaching 10,000sqm in size). Financial contributions, or off-site provision could be sought from developments with an identified project that they could contribute to.

Planners should encourage developments between 10,000 - 60,000sqm to meet the target with either financial or spatial contributions.

Planners should encourage developments over 60,000sqm to meet the target with spatial contributions, except in extraordinary circumstances (e.g. a cultural space in the development location would not meaningfully contribute to the cultural fabric of the City; a financial contribution toward the given focal area would be of greater value than a spatial contribution)

Setting and applying the target



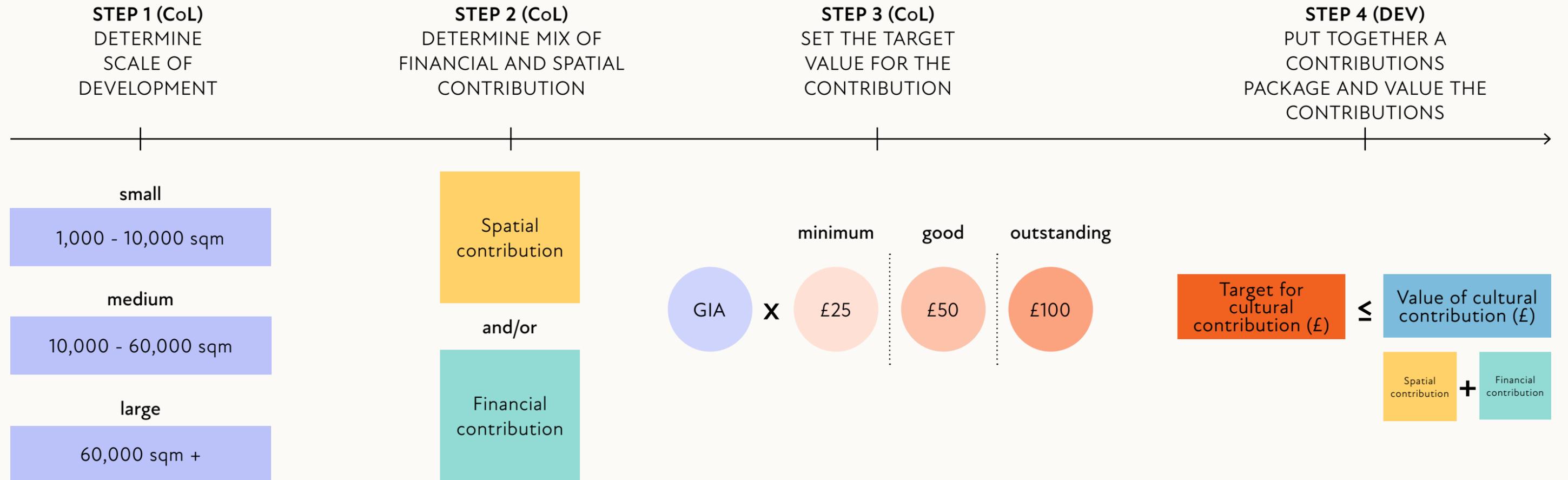
There is a flexibility built in to how the target is applied to proposed developments. This accounts for the other contributions that developers are obligated to make (e.g. carbon offsetting, CIL), and the potential harm of the development. Given an initial assessment of the proposed development, and a review of the needs of its focal area, one of three different levels of contribution can be set: minimum, good, and outstanding. If a development contributes at an outstanding level, other obligations could be lessened, and vice versa.

The application of minimum, good, or outstanding standards can correlate to the overall planning balance or to other such metrics that planners use in assessing a proposal.

The developers can flexibly meet the target with a combination of both spatial and financial contributions. Generally, buildings in the “large” category (see previous page) will be asked to meet the target with mostly spatial contribution, and buildings in the “small” category will not be required to contribute spatially, but will meet the target financially.

The City does not need to collect and disburse the funds collected with this mechanism, as they do with CIL; in fact, it may be better and more welcome that the financial contributions be direct contributions from the developer to a specific organisation (e.g. funding for programming, support with legal fees, etc.). The most important thing is that the financial contributions be specifically directed, not pooled in a general fund.

Process summary

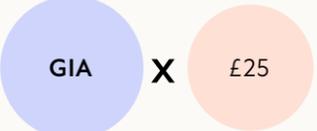
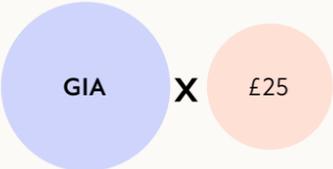
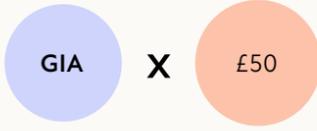
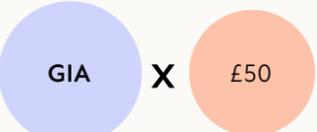
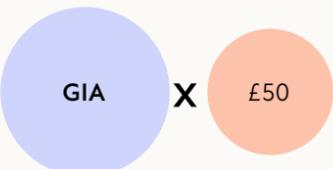
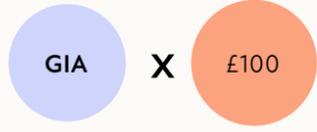
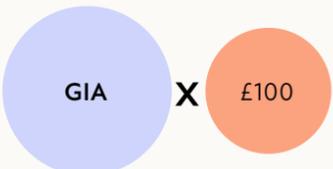


Mix of contributions types (spatial vs. financial) should be determined on a case by case scenario during the pre-app process.

The application of minimum, good, or outstanding standards can correlate to the overall planning balance or to other such metrics that planners use in assessing a proposal.

It is up to the developer to properly establish the value of their spatial contribution and the financial contribution. The proposals will be reviewed by the case officers.

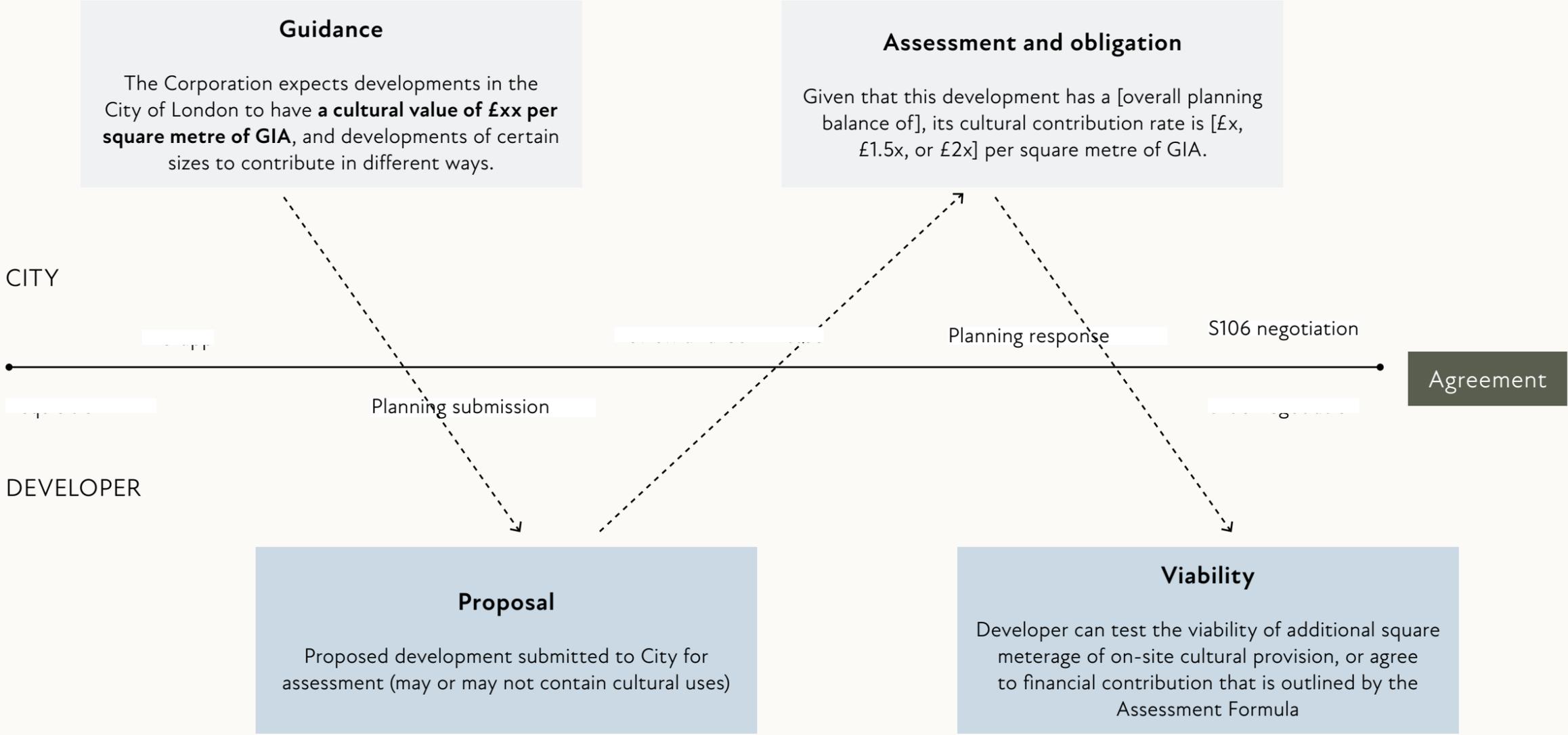
Formula summary

		← SCALE OF BUILDING →		
		1,000 - 10,000 sqm	10,000 - 60,000 sqm	60,000 sqm +
↑ OVERALL PLANNING BALANCE ↓	Low overall development impact (e.g. refurbishment)	A mostly financial contribution of a value of 	A contribution that is either spatial or financial (or a combination of both) of a value of 	A mostly spatial contribution of a value of 
	Medium overall development impact (e.g. demolition and substantial rebuild)	A mostly financial contribution of a value of 	A contribution that is either spatial or financial (or a combination of both) of a value of 	A mostly spatial contribution of a value of 
	High overall development impact (e.g. tall buildings, heritage harm)	A mostly financial contribution of a value of 	A contribution that is either spatial or financial (or a combination of both) of a value of 	A mostly spatial contribution of a value of 

Providing guidance and ensuring fair assessment

The formula is intended to both give developers a sense of what the City expects by way of cultural contribution, and also act as a fair way to assess cultural contributions post-submission. Both functions are very important to the success of the Cultural Planning Framework.

There is a way for one formula to serve both purposes (the target-based approach would do this), but if for planning viability reasons it is decided that uplift should be the metric to use for the assessment and obligation formula, significant analysis would have to be undertaken to work out what the appropriate numerical relationship between the two formulas.



02 Process and methodology

METHOD STATEMENT

- Established the ground rules and drivers for the cultural provision: its size should be related to a building's scale, and it should respond to its location and the suggestions from the Cultural Character Plans
- Researched the scale and nature of other financial obligations within the City of London, including CIL, affordable housing, local skills and training, and security
- Researched how other cities and boroughs (LB Lambeth, LB Hackney, LB Wandsworth, Chicago, and San Francisco) frame financial contributions toward cultural projects
- Using the dataset built as part of the Cultural Plans quantitative review, studied the patterns in cultural provision as it related to GIA, uplift, and other project vital stats
- Estimated the value of spatial contributions, using average commercial rental values in the City as a proxy, and studied the difference in scale between the value of these contributions and the value of the contributions applying the Wandsworth rule, finding that on average, the spatial contributions are 23 times more valuable than the financial ones would have been.
- Studied two approaches: one based on a logical model that flows one-directionally, starting from location, and ending with a specific brief for the provision; and the second based on a setting target for overall value of the cultural contribution based on the scale of the building.
- From our analyses, concluded that the second approach was more successful because it allowed for a more nuanced approach to cultural contribution “packages” that combine financial and spatial contributions. It also provides room for the developer's priorities, while still ensuring that the City has control over the delivery requirements.
- Using the same of the 20 development projects as a “random sample,” tested four methods of setting the target: £/sqm, percentage of total construction cost, percentage of expected rent income, percentage of land value.
- Used the annual operating budget of a small museum and the estimated value of 1,500 sqm of ground floor space in the City as benchmarks for meaningful value of contribution
- Using the 20 development projects, established what “good” looks like based on their actual cultural contributions. Used the results of this study to set ratios for the above methods based on three levels of quality: minimum, good, and outstanding.
- Determined that £/sqm was the most promising and simple approach to setting the target.
- Proposed a formula to translate spatial contribution into a Pound value based on the rental rates of the project's use class (and established that this number needs to be fixed by the City and imposed fairly and consistently across all development proposals)
- Analysed the scale of 30+ additional proposed buildings in the City (data provided by S106 team), and the scale thresholds applied by other Boroughs, to suggest a three-tier scale system: 0 – 10,000 sqm, 10,000 – 60,000 sqm, and 60,000+ sqm.
- Received feedback from the City's Section 106 team, which outlined a formula that determined financial contributions based on sqm uplift minus the square meterage of cultural provision, and based the £/sqm multiplier on the NPPF levels of harm.

What are we asking of the formula?

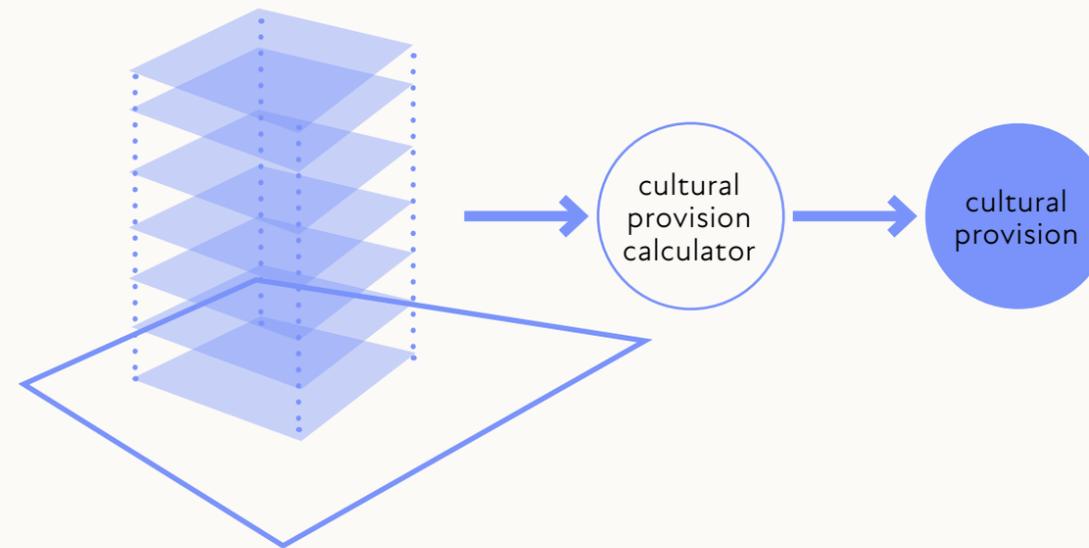
HOW TO CONTROL DEVELOPMENT FAIRLY?

The formula seeks to establish a **fair** system, with enough **flexibility**, where **space** can equate to **money**, that is guided by **area** context, that is **controllable** and **defensible**.

Ultimately, it is a mechanism designed to control development. There are two ways to do this, as outlined in the City of London Open Spaces Provision paper.

1: Targets based on development metrics

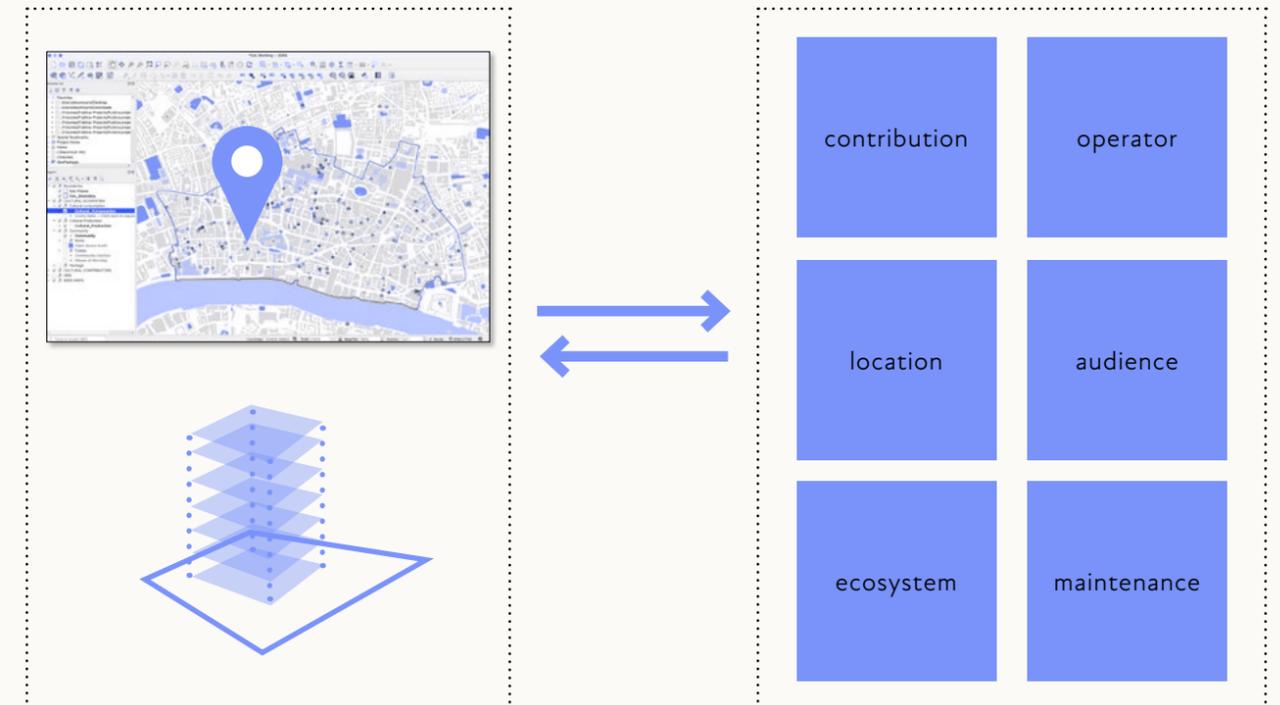
- 19. This policy approach could therefore require all major developments (over 1,000 sqm) to deliver specific amounts (floorspace area) of new public uses/spaces on site or to contribute to wider projects in the City. The policy would give priority to on-site provision and make this a requirement for large scale developments (over 10,000 sqm), with a set proportion of floorspace (and/or equivalent public realm) required to be made available as a public space or for public use.
- 20. On site provision could be set as a preference for developments between 1,000 and 10,000 sqm, with off-site provision deemed acceptable where there is an identified public space or public use project in the vicinity which would lead to better outcomes than on site provision. If it has been clearly demonstrated that on-site provision is not physically feasible or appropriate, and there is no identified project in the area, a financial contribution could be sought as part of a s106 agreement. These could be pooled and used for delivering a new public use/space somewhere else in the City or for making improvements to the existing public realm in the area.



Extracts from CoL Local Plans Sub (Planning and Transportation) Committee, City Plan 2040 – Culture, public uses and public spaces

2: Suggestions based on development qualities and cultural vision

- 23. The second option could be to adopt a bespoke approach for different types and scales of development. This option would not set out specific floorspace requirements for provision or enhancement of public uses/spaces. The type/amount of contribution would be determined on a case-by-case basis. In this option, multiple approaches could be explored for securing contributions based on specific circumstances. For example, the approach could be different if development is a refurbishment scheme, or it is linked to a heritage building. If the provision of new public use/space on site is not achievable, then other forms of contributions including off-site or financial contributions would be given equal importance. The drawback of this approach is that there would be inconsistency in the application of the policy and there could potentially be situations where meaningful contributions are not secured.



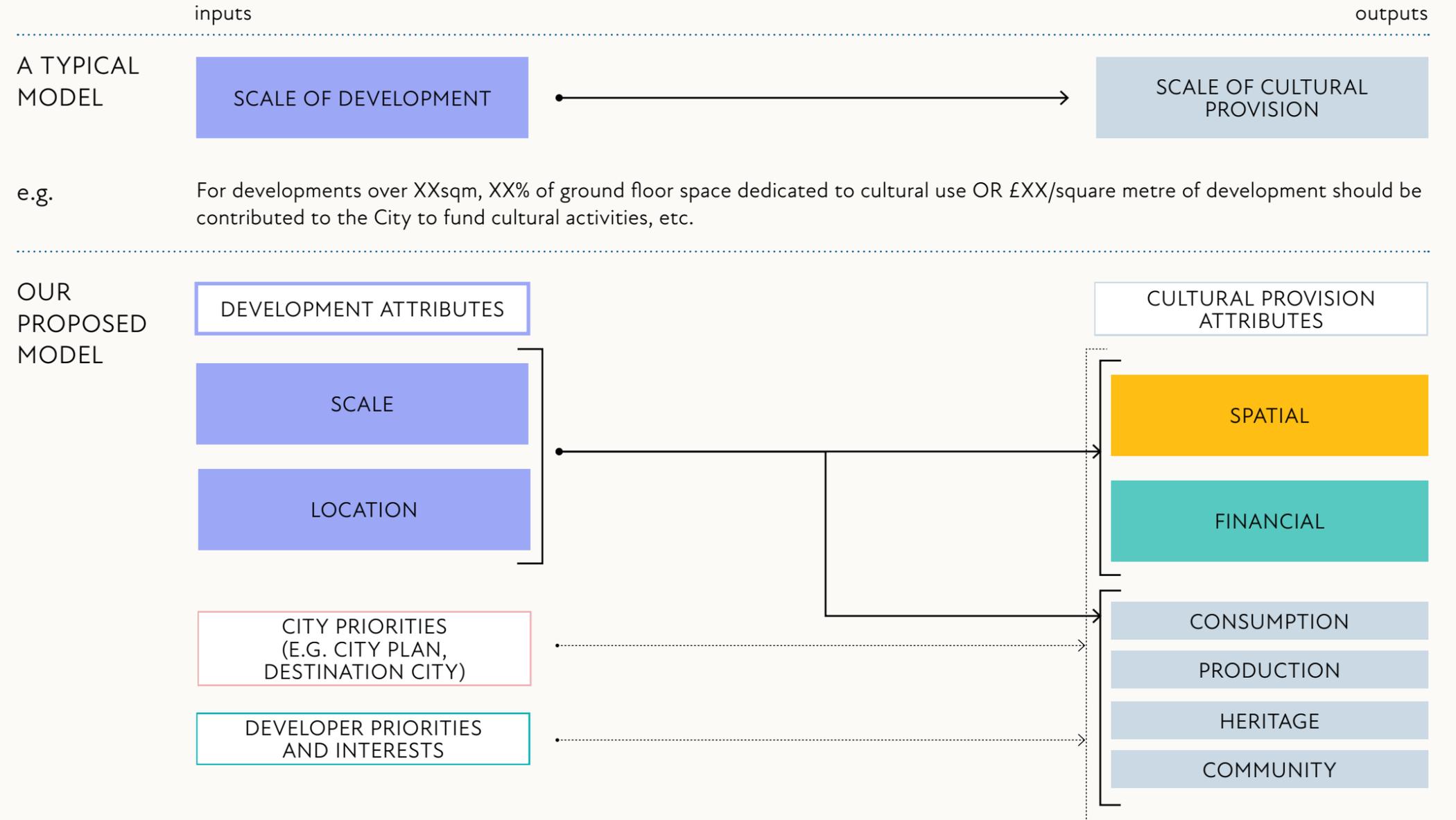
What should drive cultural provision?

FORMULA “VARIABLES”

One of our first assertions, based on logic and research into other similar contribution systems, is that the scale of the cultural provision of a given development should be related to the scale of the development project. But a system that is based solely on scale would fail ensure that more nuanced City priorities (e.g. those embedded in Destination City objectives, the Cultural Character Plans, and the City Plan) would not appear in the outputs. **In other words: ensuring proportionality in scale does not ensure appropriateness of provision or its success.** Moreover, from our conversations with developers, we learned that there are differing levels of appetite for cultural contributions between development teams. Some are very keen to actively shape the project’s cultural provision, while others would prefer to just pay a fee, like CIL contributions. We therefore pursued a formula, from the start, that would include other “variables:” development location, City’s priorities for cultural development and the priorities and interests of the developers.

This is an important aspect of the formula, as we propose it: it is intended both as guidance for developers, so they can understand the scale and priorities of the City at the outset of a development process, and as a way for planners to assess the cultural provision once plans for it have been submitted. In the pre-app process, the formula can also be used to test various different provision options, too.

In addition, we wanted to introduce some data-driven thinking into the question of scale thresholds (e.g. the formula only applies to buildings over XX square metres), which is explored at the end of this chapter, and some nuance into how we thought about “on site” and “off site” provision. We propose, as diagrammed at right, a more flexible breakdown of “spatial” and “financial” provision, with “spatial” roughly correlating to “on-site” provision, but financial having the ability to apply to on- or off-site provision.



Existing CIL + S106 contributions

FINANCIAL CONTRIBUTIONS FOR COMMERCIAL DEVELOPMENTS WITHIN CoL

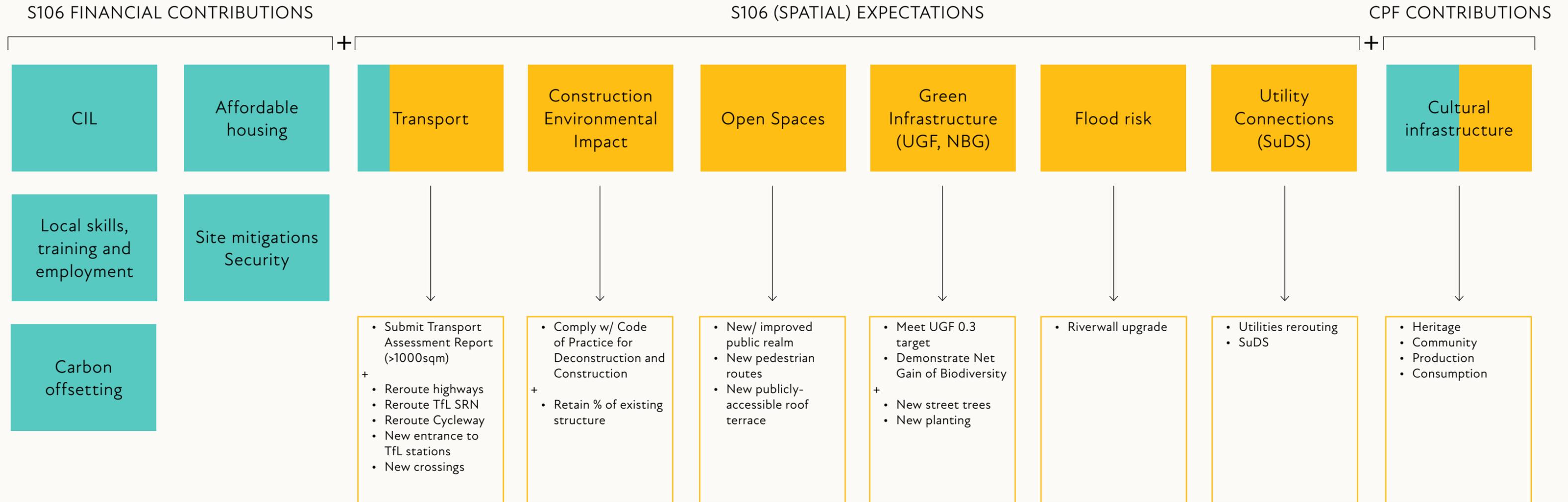
We studied the various other contributions that developers are expected to make in the City of London to understand the ecosystem in which the cultural contribution will exist. This page summarises rates for possible CIL and S106 contributions applied to commercial developments of a certain scale, as outlined in the Planning Obligations SPD.

used for	CIL	Affordable housing	Local skills, training and employment	Site mitigations: Security	Carbon offsetting
type of contribution and metric	£/sqm	£/sqm	£/sqm	£/sqm	£/tonne of carbon to be offset over 30 years
variables	rates indexed every year	applies to developments w/ net increase of 500sqm GIA	applies to developments w/ net increase of 500sqm GIA	applies to developments w/ net increase of 500sqm GIA w/in City Cluster	periodically updated in line with amendments published by the Mayor
formula	£75/sqm	£50/sqm (GIA) of additional sqm	£35/sqm of additional sqm	£10/sqm of additional sqm	£95/tonne
additional contributions			submit Employment and Skills Plan	*all rates subject to indexation	

£170/sqm

Putting culture in conversation with other planning expectations

The contributions that the cultural planning framework will guide exist alongside a suite of other planning obligations, both financial and spatial. This page summarises possible CIL and S106 contributions applied to commercial developments of a certain scale, as outlined in the Planning Obligations SPD.



S106 contributions relevant to Cultural Infrastructure

We studied other formulas that have been used by other boroughs and municipalities to secure contributions toward culture or the cultural ecosystem. This allowed us understand the scope of possibility for the City to require contributions toward culture.

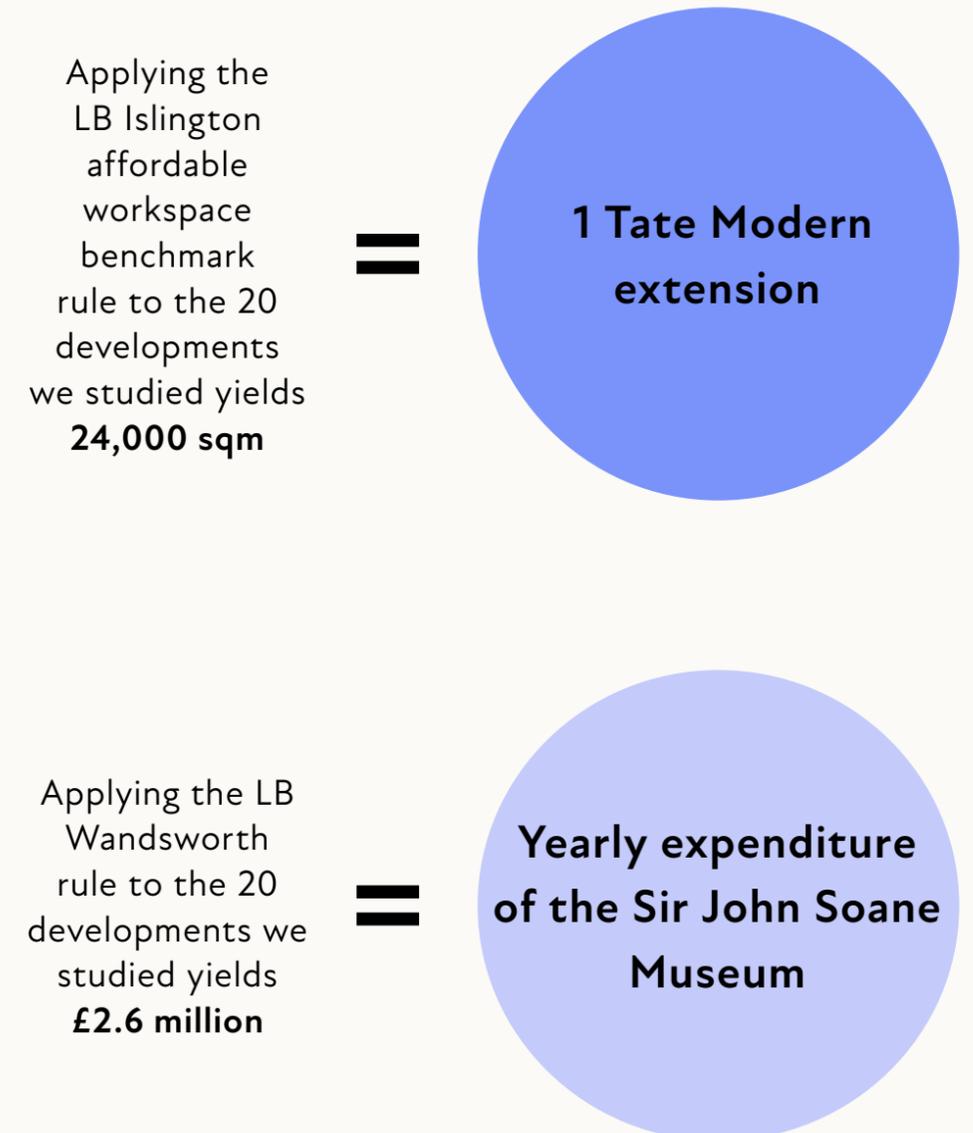
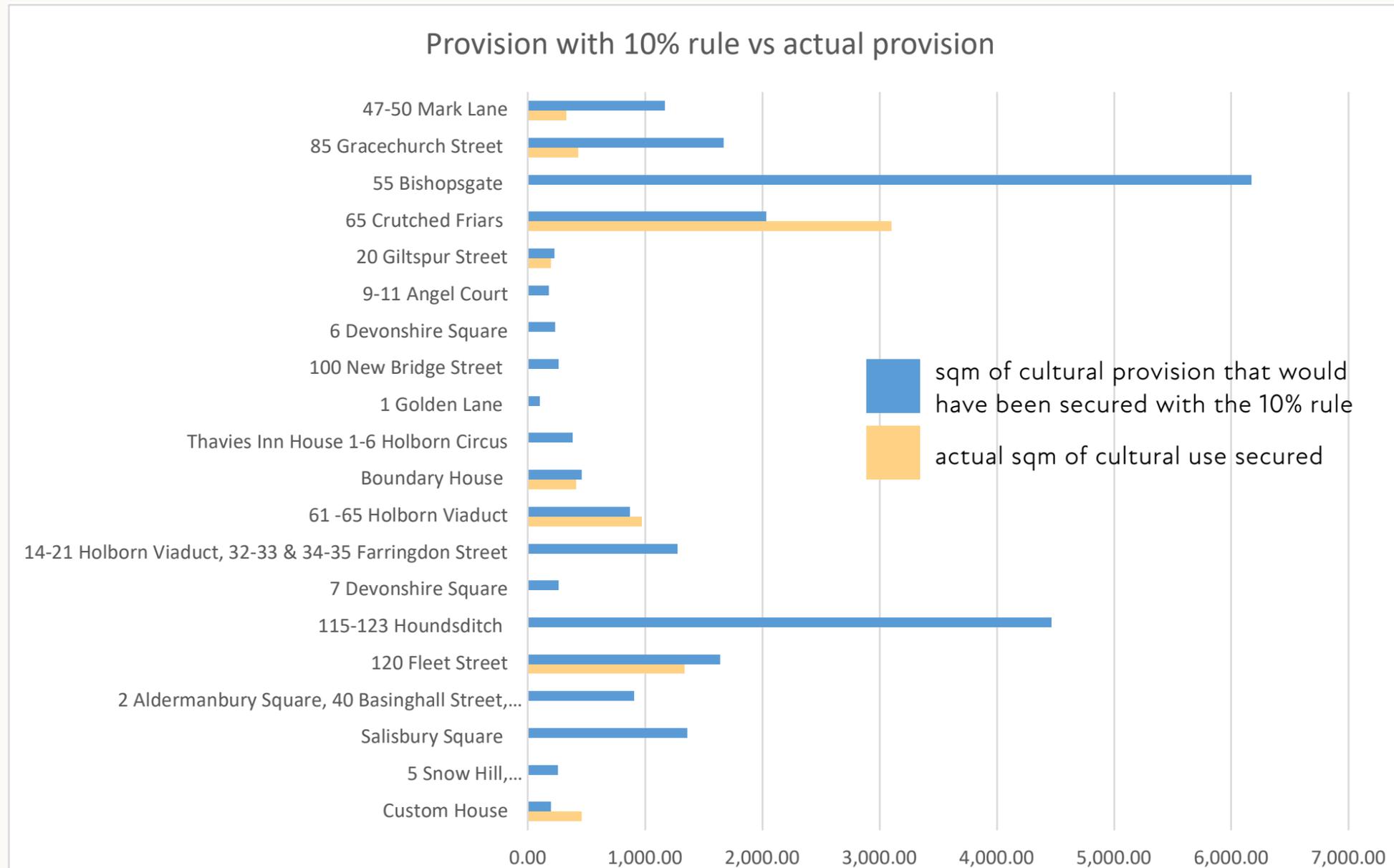
USED IN OTHER BOROUGHHS

used by/ for	LB Lambeth Affordable workspace	LB Hackney Affordable workspace	LB Wandsworth Public arts + cultural infrastructure	Chicago Public art	Other non-financial and/or non-spatial contributions:
type of contribution and metric	sqm based on % of total sqm at % of market rent for a period	sqm based on % of total sqm at % of market rent for a period	£/sqm	£/ % of total construction cost	
variables	% of market rent and length period based on location	/	applies to developments over 10,000sqm of non-residential floorspace	/	
formula	10%/total sqm	10%/total sqm at 60% of market rent in perpetuity	£20,000/10,000sqm over 10,000sqm (£2/sqm)	1% of total construction cost	

- 50% of market rent for 15yrs
- 80% of market rent for 15yrs
- 50-20% of market rent for 25yrs

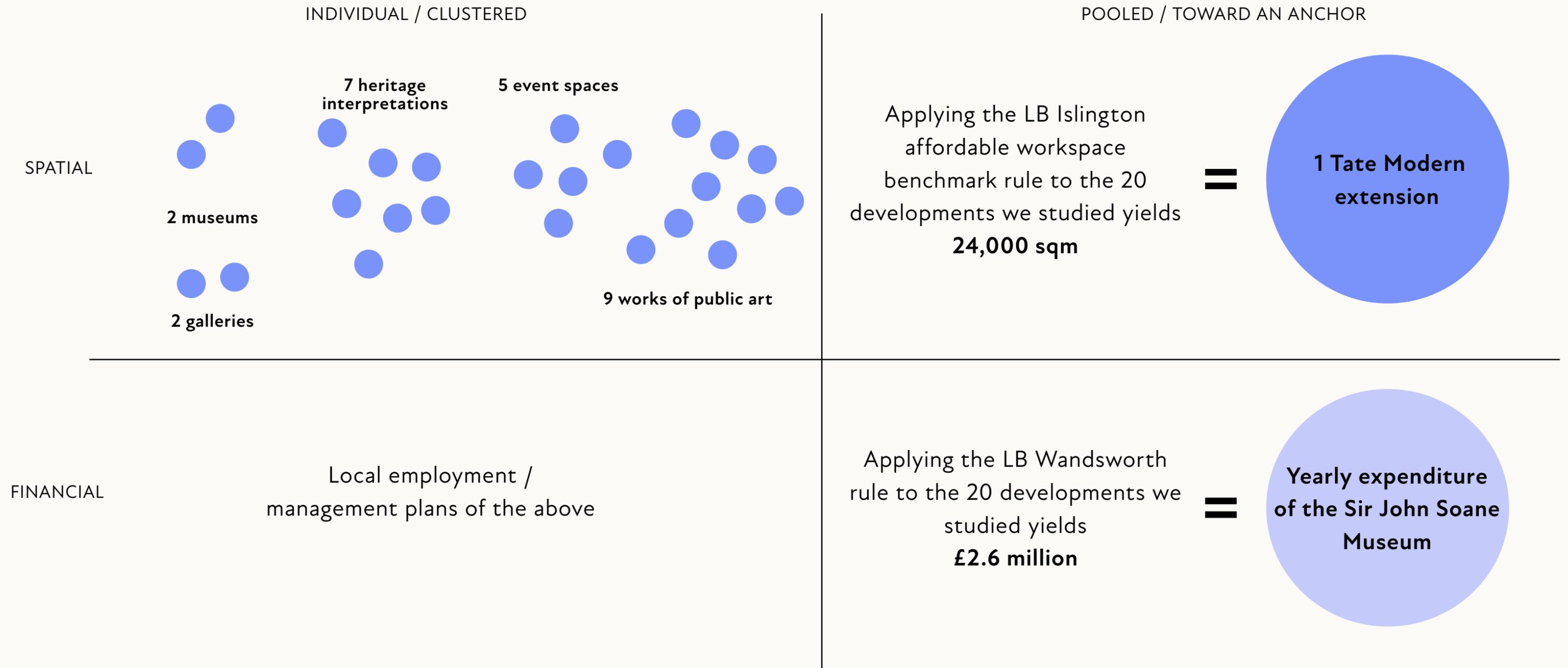
What scale of contribution could be secured?

We studied how the existing contributions measure up to what might have been secured using metrics of other boroughs (in this case, LB Islington and LB Wandsworth). This helped contextualise the scale of possibility of our formula in terms of what might be secured even with the relatively modest metrics used by these other boroughs. Note: the below chart was compiled using data included in planning submission documents (DAS and Cultural Plan), and does not reflect what was decided after planning (e.g. the NLA headquarters moving to 22 Bishopsgate). The yellow bar represents ONLY spaces of cultural production and consumption (not any public realm or roof terraces).



Individual contributions vs. pooled contributions

Using the urban morphologies from the focal areas workshop (anchors vs. clusters) can be a useful way to understand the dynamics of how we want to secure cultural provision. The combined effect of many contributions is significant, and the formula should allow for this pooling of contributions.



How to ensure that the financial contributions are equal in scale to the spatial ones?

Ground floor space dedicated to culture is immensely valueable in the City of London, where retail rental rates (i.e. what the developer could charge to a market-rate commercial tenant) and where construction costs are also high. We studied the difference in the value of spatial contributions (using average rental rates in the City of London, as found in recent reports from Savills) and the financial contributions that would have been levied if the Wandsworth metric had been applied. We found a significant difference, suggesting that there was scope for a formula that asked for more financial contribution.

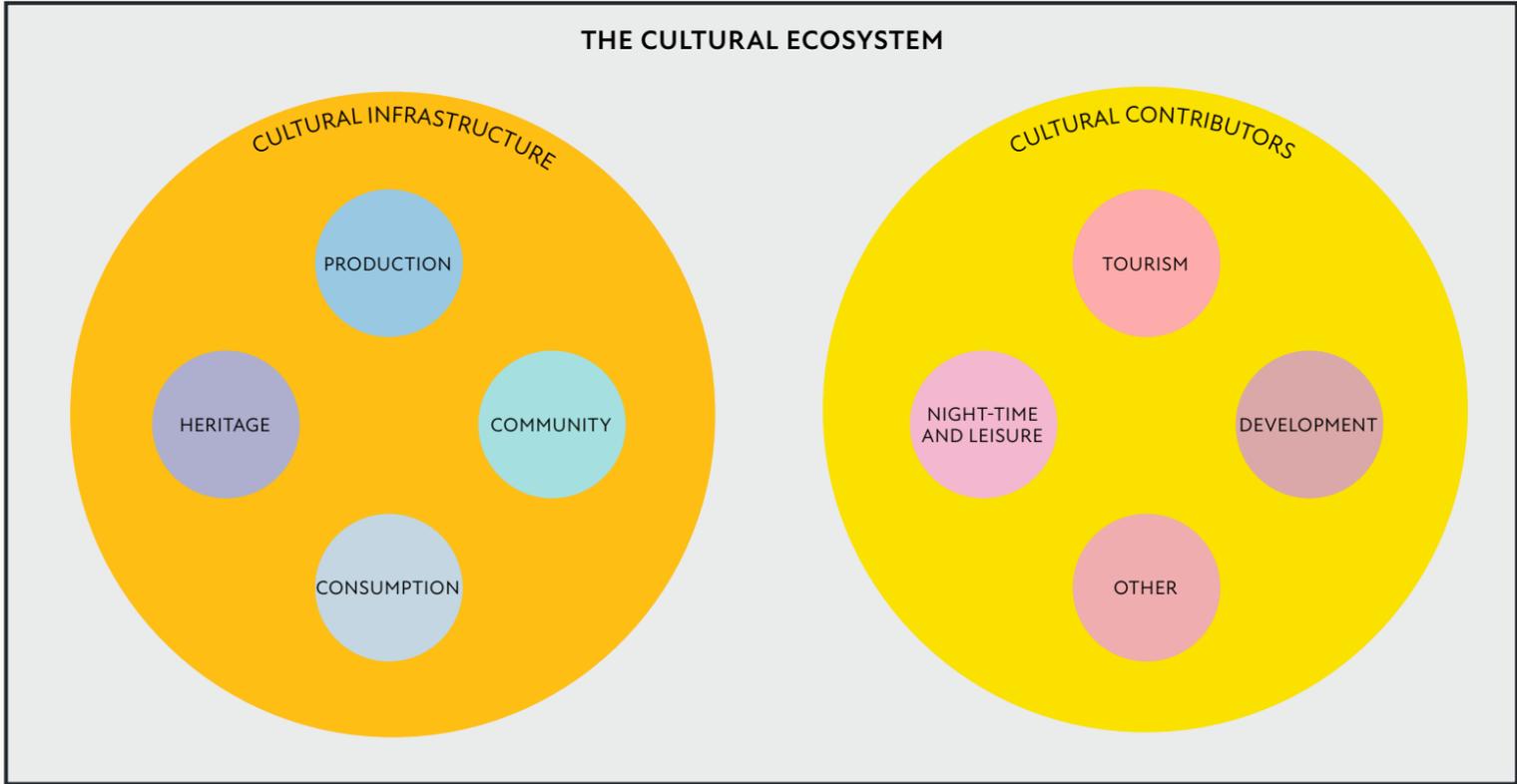
The value of spatial contributions is high; the cost of providing them is also high. If the financial contribution is not equally significant, it is likely that developers would simply pay the less-costly fee. This puts the City at a disadvantage: when applied to all 20 developments in our dataset, this behaviour would leave literally millions of Pounds of lost value on the table.

	GEA	Wandsworth rule	NIA	Average £/sqm of office space in CoL	Est. yearly rent income (assuming all NIA is office)	Floors	Est GF NIA	NIA cultural (assumption of 25% GF given to cultural use)	Yearly rent loss (i.e. value of cultural GF use)	Magnitude of difference
Custom House	24,578	£ 29,156.00	15,935.00	£ 929.58	£ 14,812,842.00	5	3,187.00	796.75	£ 740,642.10	25
5 Snow Hill	6,369	£ -	5,798.00	£ 929.58	£ 5,389,699.27	8	724.75	181.19	£ 168,428.10	—
Salisbury Square	54,942	£ 89,884.00	47,795.00	£ 929.58	£ 44,429,230.22	10	4,779.50	1,194.88	£ 1,110,730.76	12
City Tower and City Place House	63,678	£ 107,356.00	47,720.00	£ 929.58	£ 44,359,511.79	12	3,976.67	994.17	£ 924,156.50	9
120 Fleet Street	78,549	£ 137,098.00	55,450.00	£ 929.58	£ 51,545,157.77	21	2,640.48	660.12	£ 613,632.83	4
115-123 Houndsditch	70,687	£ 121,374.00	56,836.95	£ 929.58	£ 52,834,437.42	23	2,471.17	617.79	£ 574,287.36	5
7 Devonshire Square	12,962	£ 5,924.00	9,283.00	£ 929.58	£ 8,629,282.23	9	1,031.44	257.86	£ 239,702.28	40
14-21 Holborn Viaduct, 32-33 & 34-35 Farringdon Street	37,391	£ 54,782.00	24,792.00	£ 929.58	£ 23,046,123.56	12	2,066.00	516.50	£ 480,127.57	9
61 - 65 Holborn Viaduct	24,234	£ 28,468.00	15,462.00	£ 929.58	£ 14,373,151.12	12	1,288.50	322.13	£ 299,440.65	11
Boundary House	12,371	£ 4,742.00	9,484.30	£ 929.58	£ 8,816,406.49	14	677.45	169.36	£ 157,435.83	33
Thavies Inn House	12,669	£ 5,338.00	8,480.00	£ 929.58	£ 7,882,830.26	10	848.00	212.00	£ 197,070.76	37
1 Golden Lane	16,599	£ 13,198.00	10,629.00	£ 929.58	£ 9,880,495.62	13	817.62	204.40	£ 190,009.53	14
100 New Bridge Street	24,963	£ 29,926.00	19,889.15	£ 929.58	£ 18,488,536.96	10	1,988.92	497.23	£ 462,213.42	15
6 Devonshire Square	11,102	£ 2,204.00	8,926.70	£ 929.58	£ 8,298,073.22	8	1,115.84	278.96	£ 259,314.79	118
9-11 Angel Court	5,388	£ -	4,146.30	£ 929.58	£ 3,854,313.57	8	518.29	129.57	£ 120,447.30	—
20 Giltspur Street	11,855	£ 3,710.00	7,777.00	£ 929.58	£ 7,229,336.19	10	777.70	194.43	£ 180,733.40	49
65 Crutched Friars	31,062	£ 42,124.00	27,629.00	£ 929.58	£ 25,683,339.30	21	1,315.67	328.92	£ 305,754.04	7
85 Gracechurch Street	39,557	£ 59,114.00	22,553.00	£ 929.58	£ 20,964,796.09	32	704.78	176.20	£ 163,787.47	3
55 Bishopsgate	131,556	£ 243,112.00	77,641.00	£ 929.58	£ 72,173,446.24	63	1,232.40	308.10	£ 286,402.56	1
47-50 Mark Lane	31,577	£ 43,154.00	25,685.30	£ 929.58	£ 23,876,516.52	11	2,335.03	583.76	£ 542,648.10	13

Wandsworth rule: £10,000 for every 10,000sqm over 10,000sqm

Incorporating the whole cultural ecosystem, while ensuring the right emphasis

The cultural ecosystem is purposefully broad; but in the context of developing the formula, we felt that it was important to focus on the provision of cultural infrastructure itself, rather than contributors. Even within cultural infrastructure, we felt that the public realm numbers would threaten to skew the formula, and allow developers to contribute culturally just with an improved plaza—undoubtedly an important contribution, but not the intention of this planning framework.



Project name	Cultural provision							
	Cultural provision sqm breakdown				Total amount of cultural infrastructure (use)	Contributors		Total amount of cultural ecosystem use (sqm)
	Cultural production / consumption space (sqm)	Public Space (squares, new routes etc) sqm	Publicly accessible roof terrace sqm	Community space sqm		Tourism use (hotel) sqm	Any other publicly accessible uses (F&B, retail) sqm	
5 Snow Hill	0.00	0.00	0.00	0.00	0.00	5,798.00	0.00	5,798.00
Salisbury Square	0.00	1,786.00	0.00	0.00	1,786.00	0.00	1,418.00	3,204.00
City Tower and City Place House	0.00	2,070.00	0.00	0.00	2,070.00	0.00	2,689.00	4,759.00

Two approaches to establishing a formula

We explored two approaches to setting up a formula: Approach 1 is a one-way logical (i.e. based on binary conditions) model that determines cultural provision based on an assessment first of location then of scale of the building. Approach 2 is a target-based approach that sets a target for the total value of cultural contribution and a flexible system that allows developers to meet the target in various different ways.

APPROACH 1



APPROACH 2



Approach 1

“ORDER OF OPERATIONS”

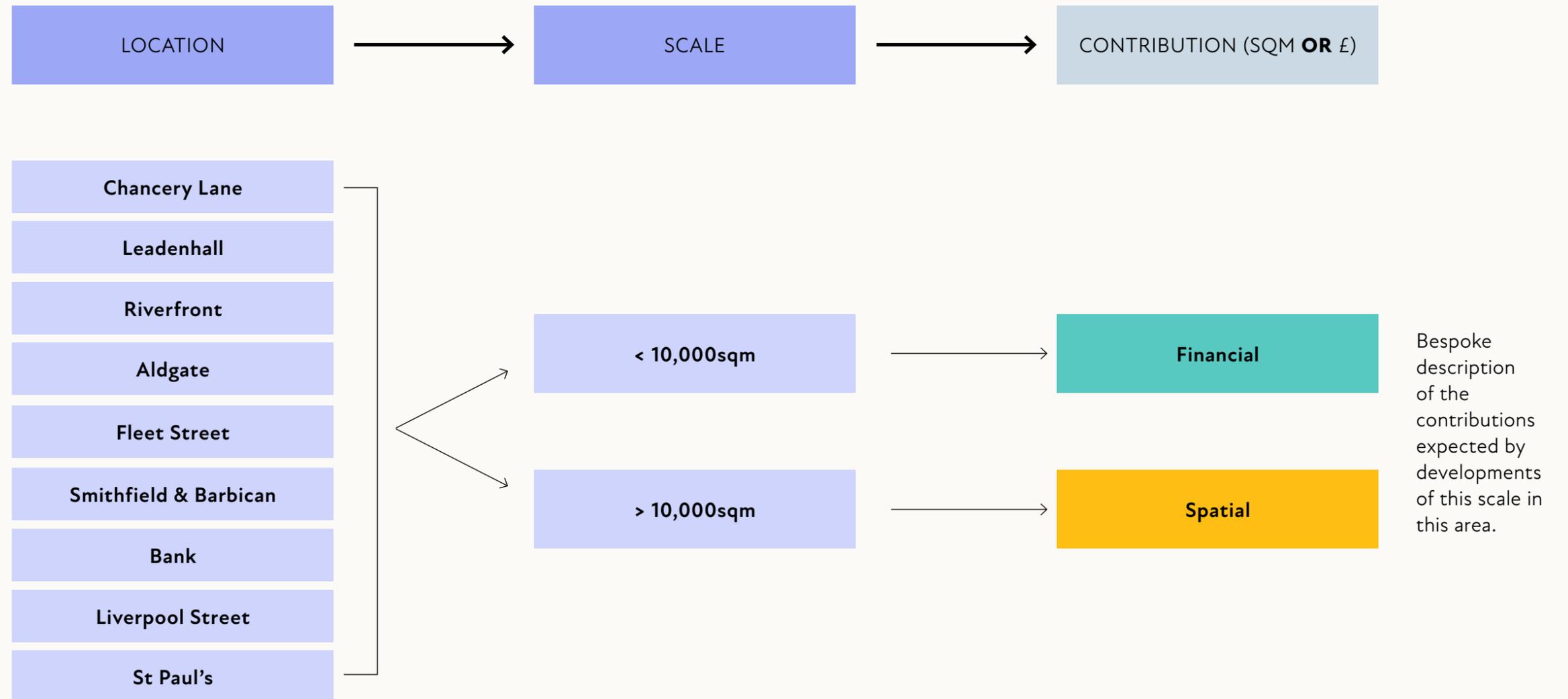
Approach 1 is a logical (i.e. based on binary, mutually exclusive conditions) model that flows one-directionally, starting with location of PD, with binary/mutually-exclusive choices at each decision point that results in single, pre-determined “paired” description of provision

PROS

- Relatively straightforward
- Maximum control for City; i.e. bespoke descriptions of contributions allows City to dictate exactly what is expected of what development where

CONS

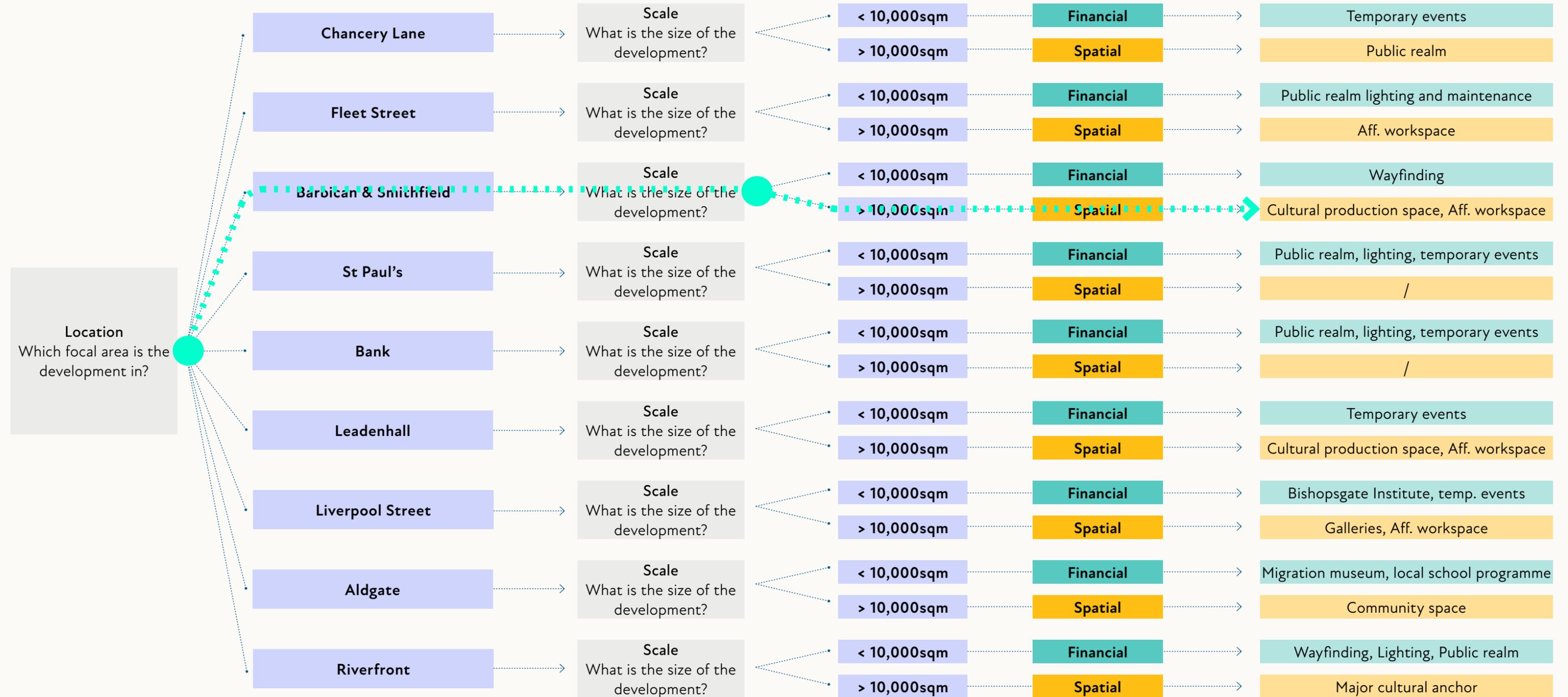
- Inflexible: Outcome is almost entirely driven by the location and scale
- Requires defining “bands” of scale, or a threshold, which could be difficult and non-evidence based
- Does not immediately address the difference in value between financial and spatial contributions
- Bespoke metrics for each contribution could be seen as onerous or unfair
- Where are developer priorities in the equation?



Approach 1

DETAIL

The flow chart below shows the full implication of Approach 1: a tailored and specific contribution would have to be developed for every permutation of location and scale. The ones below are for example only, and are not to be taken as recommendations.



Approach 2

“ORDER OF OPERATIONS”

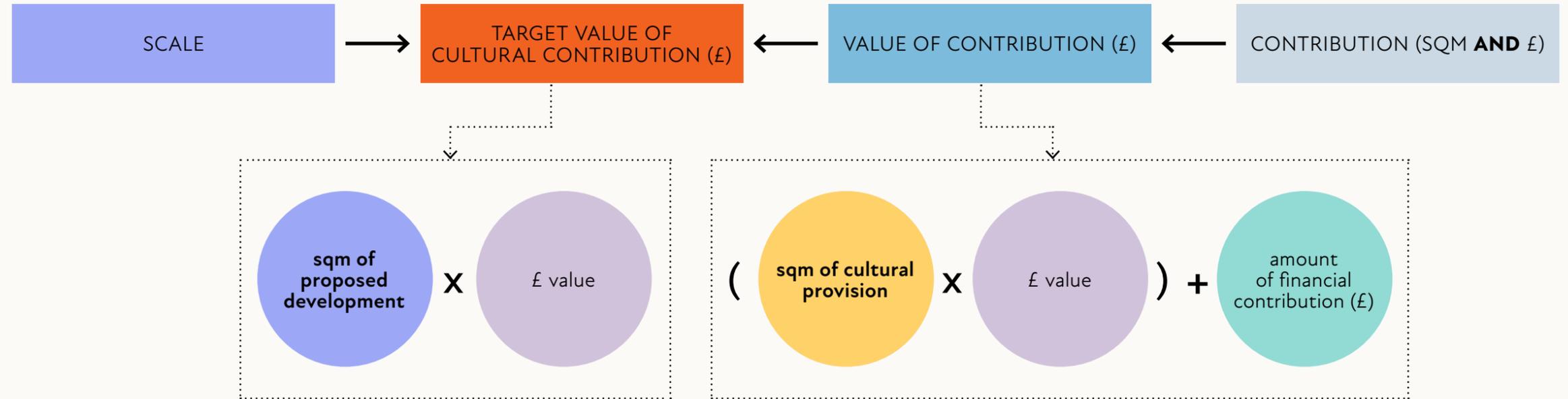
Approach 2 proposes a predetermined “target” based on value of contribution to hit based on scale of proposed development. The choice is with developer to determine how to hit the target. The ultimate cultural contribution is driven relatively equally by the scale of development, the developer’s own choices/priorities, and the priorities set in the Focal Areas, which would form the guidance as to what type of cultural space or financial support would be expected in which parts of the City.

PROS

- No need for developing multiple “bands” of scale of developments (though a “threshold” is still needed)
- Target is flexible based on economic conditions of the time that planning application is submitted
- Contributions can be both spatial and financial, because NIA is “translated” to a value
- Allows for flexibility
- Allows for developer preference/choice
- City priorities embedded in the focal areas
- Allows for different “weighting” of cultural infrastructure and contributors so public realm, F&B, etc. aren’t overcounted

CONS

- How to set the target metric?
- How to determine which development attribute to use for scale?
- How to calculate the value of spatial contributions?



Approach 2

EXAMPLES OF TARGET-BASED APPROACHES

SOCIAL VALUE PORTAL

5 THEMES
20 OUTCOMES
48 (core) MEASURES

ONE MEASUREMENT & REPORTING STANDARD

Theme	Outcome	Measures	Units	Value
Growth and Jobs	More local people in local work	No. Young Offenders	No. people	£58,611/per
Promote Local Business	More opportunities for local SMEs and VCSEs	No. Voluntary hours	No. hrs	£14.43/hr
Healthy Communities	A More Resilient Third Sector	Spend in local supply chain	£ spent	Local Spend
Greener and Cleaner	Vulnerable people better supported	Reduced CO2e	tCO2e	£64.66/tCo2e
Social Innovation	Reduced carbon emissions			

*Total Social Value = Sum(Measures*Value)*

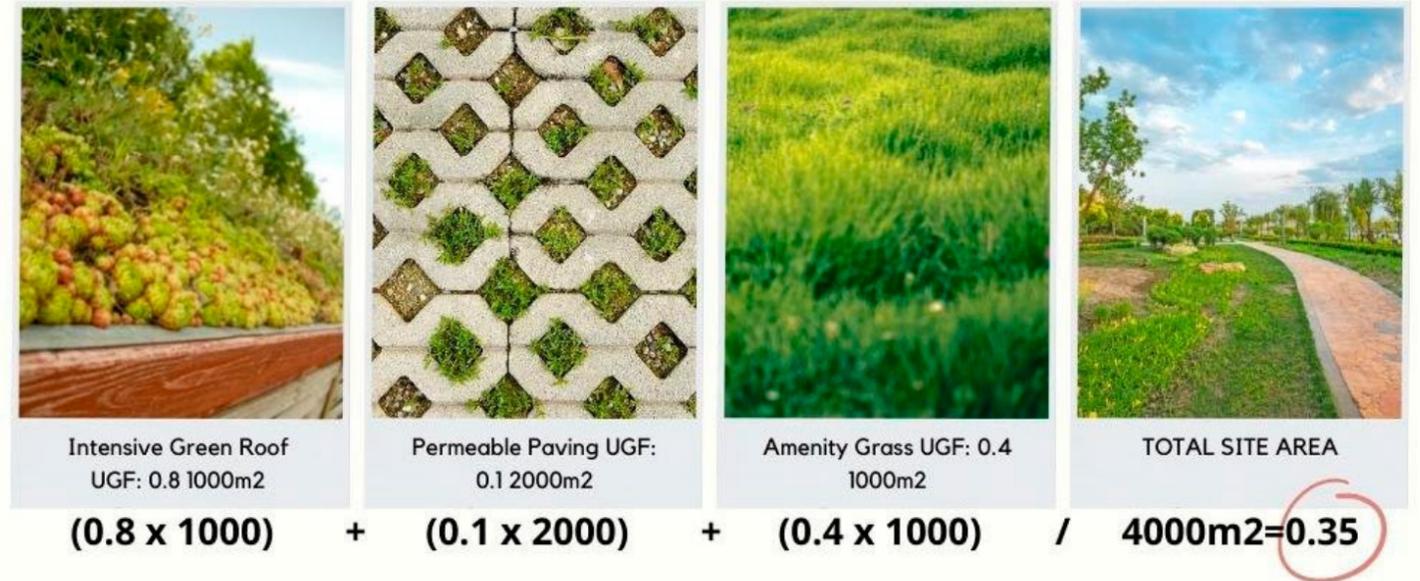
Target: 10 - 30% of total contract amount

Each Unit of a given Measure is assigned a certain value by Social Value Portal

Social value and greening are two areas that already use a target-based approach to secure contributions from developers and shape the design of the proposal: the Social Value Portal has a rigorous way to calculate the total social value of a project, which assigns a Pound value to units associated with measures and outcomes. Many councils now have a minimum target that the total social value of a project should be 10-30% of the total contract amount. The Urban Greening Factor guidance similarly assigns a value for each constituent element of a landscape project, and requires that developments hit a target of .3. Both systems use the scale of the project to set the target, and various elements of the proposal, multiplied by some value multiplier, to assess if the project hits the target.

URBAN GREENING FACTOR

(Factor A x Area) + (Factor B x Area) + Factor C x Area) / Total Site Area



London Plan Suggested Targets
Residential = 0.4
Commercial = 0.3

Calculation of UGF (GLA, 2019)

Target: ratio of .3

Project elements assigned a value, then multiplied by the sqm of the site area dedicated to that element

Approach 2

STUDYING WHICH METRIC TO USE TO CAPTURE SCALE OF A PROPOSED DEVELOPMENT

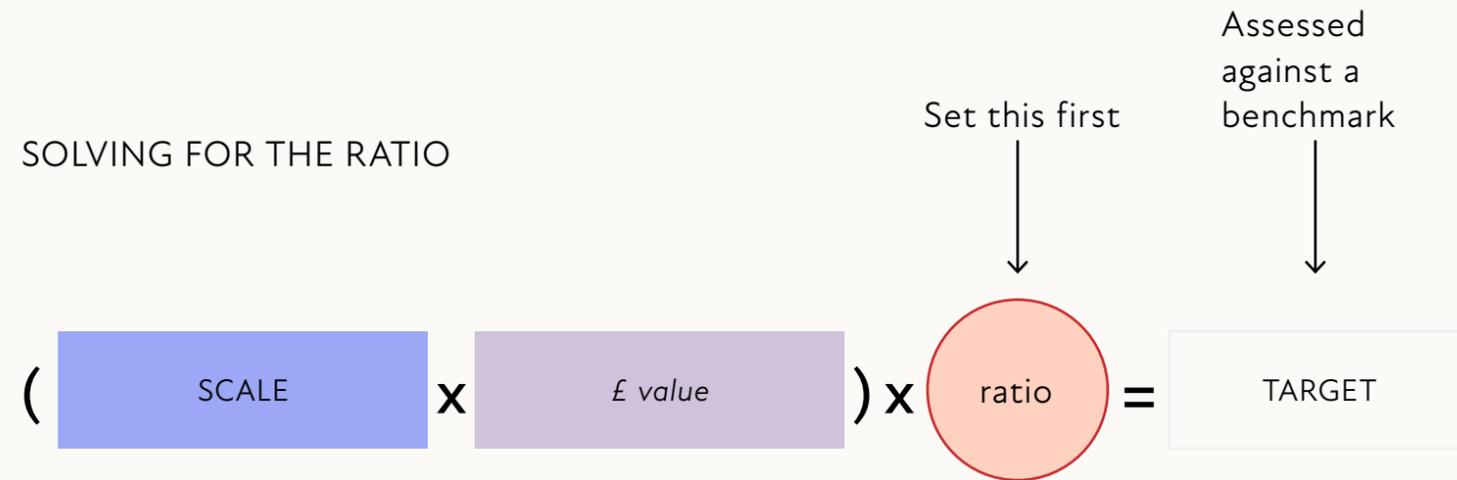
We studied the performance of four different ways of describing the scale of the building to determine the most suitable metric for use in the formula.

Note that we did not study uplift as a scale metric. For our rationale here, please see the final page of this chapter, the Recommendations summary, as well as the quantitative review of the cultural plans in the following chapter. This study showed that there is no consistent correlation between uplift and scale of resulting building, nor between uplift and scale of cultural contribution. When the ratio between secured cultural provision and overall building area was studied, there was a more consistent pattern, suggesting that this metric is a better one on which to base contributions.



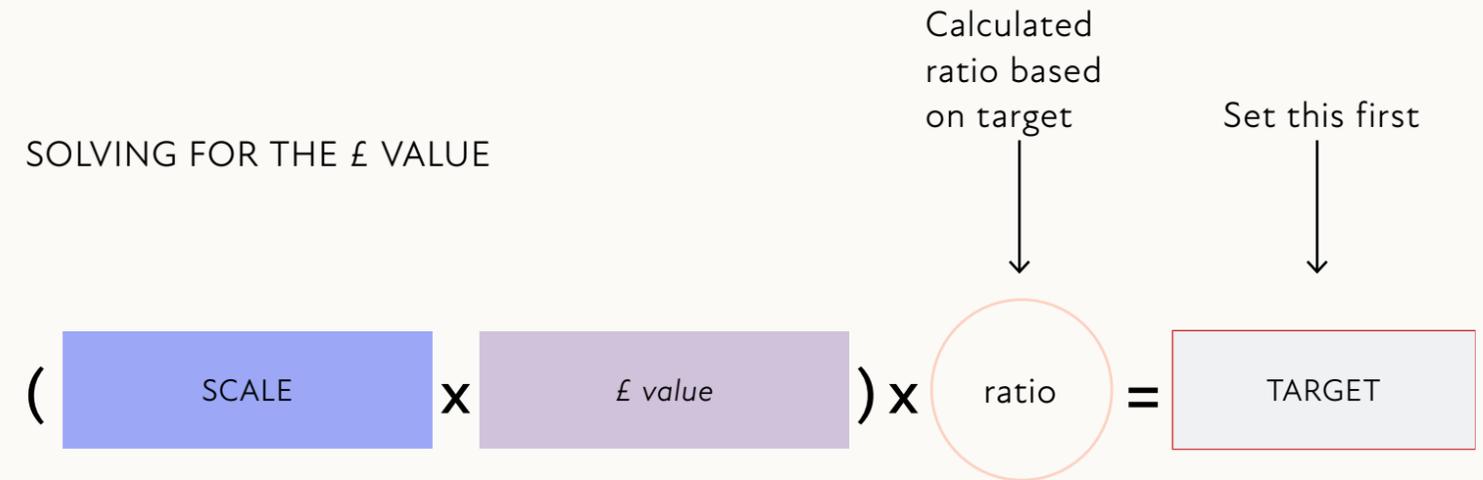
Approach 2

TWO METHODS TO ESTABLISH WHAT “GOOD” LOOKS LIKE



Using the developments from the cultural plans spreadsheet as a random control set, and using pre-set benchmarks drawn from our research around meaningful cultural contribution values, we studied three ratios for each of four scale metrics.

We focussed first on the left-hand side of the equation: setting the target. But before we could proceed, we had to understand what “good” cultural contribution looked like within our sample dataset of 20 developments with cultural contributions. We pursued two different methods for establishing these benchmarks.

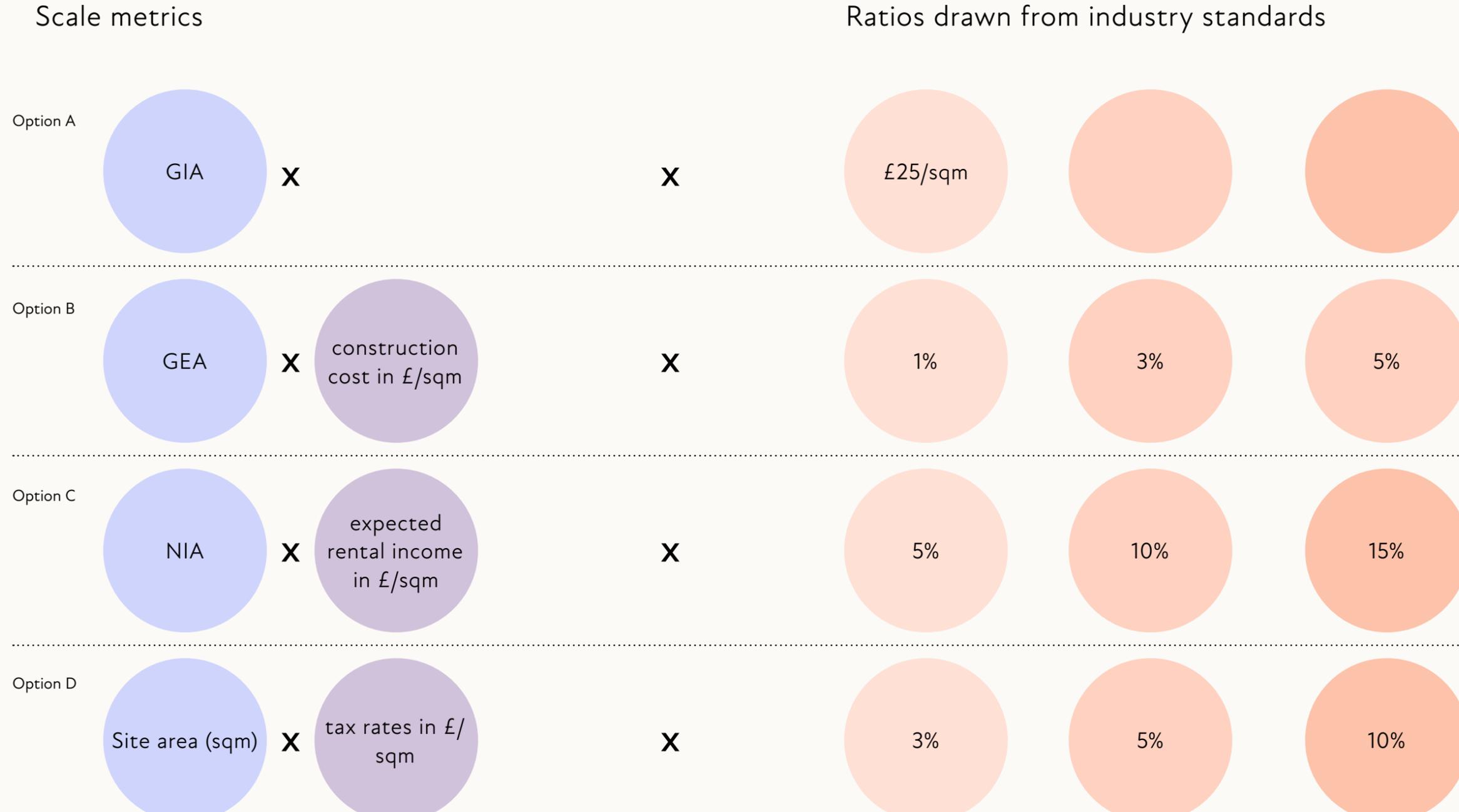


Studying the **actual contributions** of all 20 cultural plans, we chose three that represented “minimum,” “good,” and “outstanding” contributions, and set that amount as a target, then calculated what the ratio would have to be in order to reach that target amount

Approach 2

SETTING THE TARGET BASED ON INDUSTRY STANDARDS

We also studied the performance of four different ways of describing the scale of the building to determine the most suitable metric for use in the formula.



Approach 2 - Option A

£/SQM GIA

These rates would be subject to occasional indexing and re-assessment.



CONTROLS AND ASSUMPTIONS			
Est value of 1500sqm for cultural use	Est operating costs of a small museum	Avg rent for office space in prime CoL per sqm	Avg construction costs in prime CoL per sqm
£ 1,394,370.00	£ 2,500,000.00	£ 929.58	£ 4,000.00

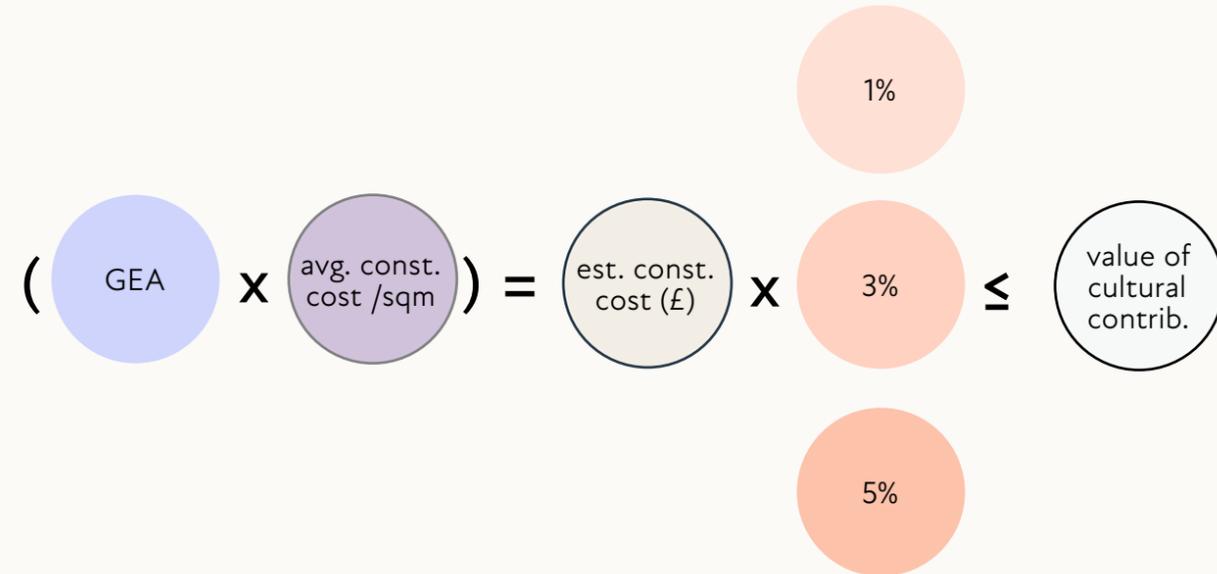
To help contextualise our studies of each scale metric and each ratio, we established two benchmarks for cultural contribution: the estimated value of 1,500sqm of ground floor space in the City of London, and the average yearly operating cost of a small museum. Cells coloured in yellow “clear” the lower benchmark, while cells coloured in green “clear” the higher benchmark.

Development	£25/sqm	£50/sqm	£100/sqm
Custom House	£ 553,005.00	£ 1,106,010.00	£ 2,212,020.00
5 Snow Hill	£ 143,302.50	£ 286,605.00	£ 573,210.00
Salisbury Square	£ 1,236,195.00	£ 2,472,390.00	£ 4,944,780.00
City Tower and City Place House	£ 1,432,755.00	£ 2,865,510.00	£ 5,731,020.00
120 Fleet Street	£ 1,767,352.50	£ 3,534,705.00	£ 7,069,410.00
115-123 Houndsditch	£ 1,590,457.50	£ 3,180,915.00	£ 6,361,830.00
7 Devonshire Square	£ 291,645.00	£ 583,290.00	£ 1,166,580.00
14-21 Holborn Viaduct, 32-33 & 34-35 Farringdon Street	£ 841,297.50	£ 1,682,595.00	£ 3,365,190.00
61 - 65 Holborn Viaduct	£ 545,265.00	£ 1,090,530.00	£ 2,181,060.00
Boundary House	£ 278,347.50	£ 556,695.00	£ 1,113,390.00
Thavies Inn House	£ 285,052.50	£ 570,105.00	£ 1,140,210.00
1 Golden Lane	£ 373,477.50	£ 746,955.00	£ 1,493,910.00
100 New Bridge Street	£ 561,667.50	£ 1,123,335.00	£ 2,246,670.00
6 Devonshire Square	£ 249,795.00	£ 499,590.00	£ 999,180.00
9-11 Angel Court	£ 121,230.00	£ 242,460.00	£ 484,920.00
20 Giltspur Street	£ 266,737.50	£ 533,475.00	£ 1,066,950.00
65 Crutched Friars	£ 698,895.00	£ 1,397,790.00	£ 2,795,580.00
85 Gracechurch Street	£ 890,032.50	£ 1,780,065.00	£ 3,560,130.00
55 Bishopsgate	£ 2,960,010.00	£ 5,920,020.00	£ 11,840,040.00
47-50 Mark Lane	£ 710,482.50	£ 1,420,965.00	£ 2,841,930.00

Approach 2 - Option B

% OF THE VALUE OF TOTAL CONSTRUCTION COST

CONTROLS AND ASSUMPTIONS			
Est value of 1500sqm for cultural use	Est operating costs of a small museum	Avg rent for office space in prime CoL per sqm	Avg construction costs in prime CoL per sqm
£ 1,394,370.00	£ 2,500,000.00	£ 929.58	£ 4,000.00

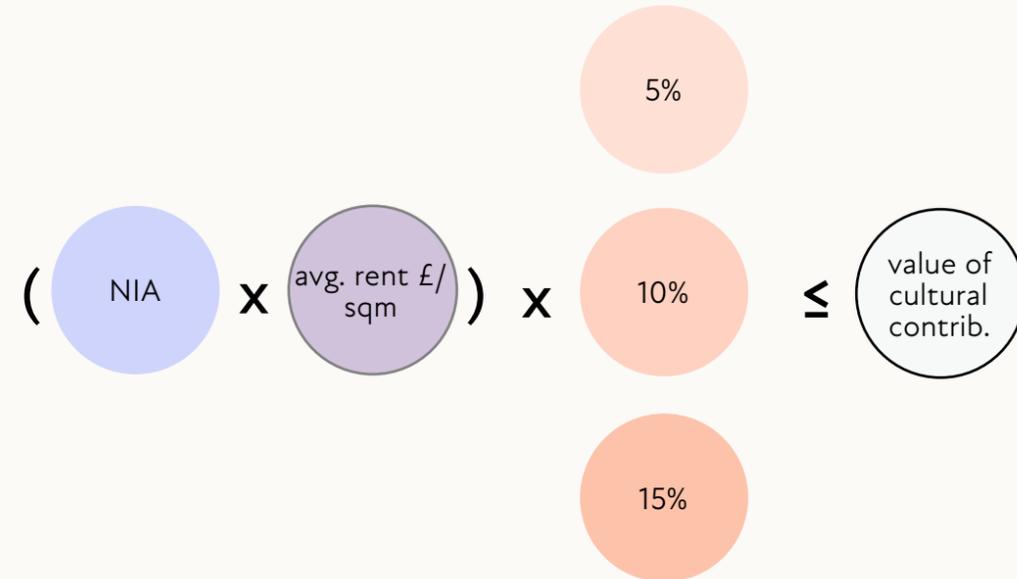


Development	Total construction cost	1%	3%	5%
Custom House	£ 98,312,000.00	£ 983,120.00	£ 2,949,360.00	£ 4,915,600.00
5 Snow Hill	£ 25,476,000.00	£ 254,760.00	£ 764,280.00	£ 1,273,800.00
Salisbury Square	£ 219,768,000.00	£ 2,197,680.00	£ 6,593,040.00	£ 10,988,400.00
City Tower and City Place House	£ 254,712,000.00	£ 2,547,120.00	£ 7,641,360.00	£ 12,735,600.00
120 Fleet Street	£ 314,196,000.00	£ 3,141,960.00	£ 9,425,880.00	£ 15,709,800.00
115-123 Houndsditch	£ 282,748,000.00	£ 2,827,480.00	£ 8,482,440.00	£ 14,137,400.00
7 Devonshire Square	£ 51,848,000.00	£ 518,480.00	£ 1,555,440.00	£ 2,592,400.00
14-21 Holborn Viaduct, 32-33 & 34-35 Farringdon Street	£ 149,564,000.00	£ 1,495,640.00	£ 4,486,920.00	£ 7,478,200.00
61 - 65 Holborn Viaduct	£ 96,936,000.00	£ 969,360.00	£ 2,908,080.00	£ 4,846,800.00
Boundary House	£ 49,484,000.00	£ 494,840.00	£ 1,484,520.00	£ 2,474,200.00
Thavies Inn House	£ 50,676,000.00	£ 506,760.00	£ 1,520,280.00	£ 2,533,800.00
1 Golden Lane	£ 66,396,000.00	£ 663,960.00	£ 1,991,880.00	£ 3,319,800.00
100 New Bridge Street	£ 99,852,000.00	£ 998,520.00	£ 2,995,560.00	£ 4,992,600.00
6 Devonshire Square	£ 44,408,000.00	£ 444,080.00	£ 1,332,240.00	£ 2,220,400.00
9-11 Angel Court	£ 21,552,000.00	£ 215,520.00	£ 646,560.00	£ 1,077,600.00
20 Giltspur Street	£ 47,420,000.00	£ 474,200.00	£ 1,422,600.00	£ 2,371,000.00
65 Crutched Friars	£ 124,248,000.00	£ 1,242,480.00	£ 3,727,440.00	£ 6,212,400.00
85 Gracechurch Street	£ 158,228,000.00	£ 1,582,280.00	£ 4,746,840.00	£ 7,911,400.00
55 Bishopsgate	£ 526,224,000.00	£ 5,262,240.00	£ 15,786,720.00	£ 26,311,200.00
47-50 Mark Lane	£ 126,308,000.00	£ 1,263,080.00	£ 3,789,240.00	£ 6,315,400.00

Approach 2 - Option C

% OF THE VALUE OF EXPECTED RENTAL INCOME

CONTROLS AND ASSUMPTIONS			
Est value of 1500sqm for cultural use	Est operating costs of a small museum	Avg rent for office space in prime CoL per sqm	Avg construction costs in prime CoL per sqm
£ 1,394,370.00	£ 2,500,000.00	£ 929.58	£ 4,000.00

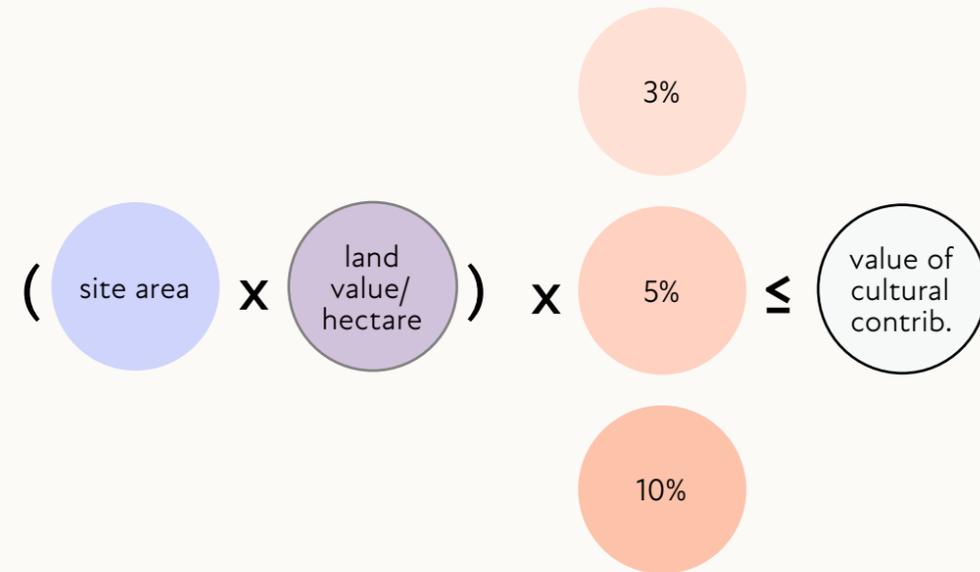


Development	Est total rent income	5%	10%	15%
Custom House	£ 17,478,121.19	£ 873,906.06	£ 1,747,812.12	£ 2,621,718.18
5 Snow Hill	£ 4,529,178.69	£ 226,458.93	£ 452,917.87	£ 679,376.80
Salisbury Square	£ 39,070,833.04	£ 1,953,541.65	£ 3,907,083.30	£ 5,860,624.96
City Tower and City Place				
House	£ 45,283,253.36	£ 2,264,162.67	£ 4,528,325.34	£ 6,792,488.00
120 Fleet Street	£ 55,858,448.26	£ 2,792,922.41	£ 5,585,844.83	£ 8,378,767.24
115-123 Houndsditch	£ 50,267,554.42	£ 2,513,377.72	£ 5,026,755.44	£ 7,540,133.16
7 Devonshire Square	£ 9,217,650.21	£ 460,882.51	£ 921,765.02	£ 1,382,647.53
14-21 Holborn Viaduct, 32-33 & 34-35 Farringdon Street	£ 26,589,813.22	£ 1,329,490.66	£ 2,658,981.32	£ 3,988,471.98
61 - 65 Holborn Viaduct	£ 17,233,492.92	£ 861,674.65	£ 1,723,349.29	£ 2,585,023.94
Boundary House	£ 8,797,373.15	£ 439,868.66	£ 879,737.31	£ 1,319,605.97
Thavies Inn House	£ 9,009,289.50	£ 450,464.48	£ 900,928.95	£ 1,351,393.43
1 Golden Lane	£ 11,804,025.29	£ 590,201.26	£ 1,180,402.53	£ 1,770,603.79
100 New Bridge Street	£ 17,751,905.74	£ 887,595.29	£ 1,775,190.57	£ 2,662,785.86
6 Devonshire Square	£ 7,894,950.83	£ 394,747.54	£ 789,495.08	£ 1,184,242.62
9-11 Angel Court	£ 3,831,561.44	£ 191,578.07	£ 383,156.14	£ 574,734.22
20 Giltspur Street	£ 8,430,430.74	£ 421,521.54	£ 843,043.07	£ 1,264,564.61
65 Crutched Friars	£ 22,089,079.68	£ 1,104,453.98	£ 2,208,907.97	£ 3,313,361.95
85 Gracechurch Street	£ 28,130,117.99	£ 1,406,505.90	£ 2,813,011.80	£ 4,219,517.70
55 Bishopsgate	£ 93,553,247.26	£ 4,677,662.36	£ 9,355,324.73	£ 14,032,987.09
47-50 Mark Lane	£ 22,455,310.96	£ 1,122,765.55	£ 2,245,531.10	£ 3,368,296.64

Approach 2 - Option D

% OF THE LAND VALUE

This metric is relatively stable, i.e. it doesn't change much over time, but it is not representative of building scale. It includes public realm of a site.



CONTROLS AND ASSUMPTIONS			
Est value of 1500sqm for cultural use	Est operating costs of a small museum	Avg rent for office space in prime CoL per sqm	Avg construction costs in prime CoL per sqm
£ 1,394,370.00	£ 2,500,000.00	£ 929.58	£ 4,000.00

Development	Total value of land	3%	5%	10%
Custom House	£ 112,765,000.00	£ 3,382,950.00	£ 5,638,250.0000	£ 11,276,500.0000
5 Snow Hill	£ 15,573,440.00	£ 467,203.20	£ 778,672.0000	£ 1,557,344.0000
Salisbury Square	£ 94,841,300.00	£ 2,845,239.00	£ 4,742,065.0000	£ 9,484,130.0000
City Tower and City Place House	£ 71,220,000.00	£ 2,136,600.00	£ 3,561,000.0000	£ 7,122,000.0000
120 Fleet Street	£ 52,441,660.00	£ 1,573,249.80	£ 2,622,083.0000	£ 5,244,166.0000
115-123 Houndsditch	£ 34,233,080.00	£ 1,026,992.40	£ 1,711,654.0000	£ 3,423,308.0000
7 Devonshire Square	£ 59,717,970.00	£ 1,791,539.10	£ 2,985,898.5000	£ 5,971,797.0000
14-21 Holborn Viaduct, 32-33 & 34-35 Farringdon Street	£ 38,921,730.00	£ 1,167,651.90	£ 1,946,086.5000	£ 3,892,173.0000
61 - 65 Holborn Viaduct	£ 25,520,500.00	£ 765,615.00	£ 1,276,025.0000	£ 2,552,050.0000
Boundary House	£ 11,596,990.00	£ 347,909.70	£ 579,849.5000	£ 1,159,699.0000
Thavies Inn House	£ 35,301,380.00	£ 1,059,041.40	£ 1,765,069.0000	£ 3,530,138.0000
1 Golden Lane	£ 28,036,940.00	£ 841,108.20	£ 1,401,847.0000	£ 2,803,694.0000
100 New Bridge Street	£ 33,236,000.00	£ 997,080.00	£ 1,661,800.0000	£ 3,323,600.0000
6 Devonshire Square	£ 213,660,000.00	£ 6,409,800.00	£ 10,683,000.0000	£ 21,366,000.0000
9-11 Angel Court	£ 7,383,140.00	£ 221,494.20	£ 369,157.0000	£ 738,314.0000
20 Giltspur Street	£ 22,553,000.00	£ 676,590.00	£ 1,127,650.0000	£ 2,255,300.0000
65 Crutched Friars	£ 22,256,250.00	£ 667,687.50	£ 1,112,812.5000	£ 2,225,625.0000
85 Gracechurch Street	£ 18,992,000.00	£ 569,760.00	£ 949,600.0000	£ 1,899,200.0000
55 Bishopsgate	£ 34,458,610.00	£ 1,033,758.30	£ 1,722,930.5000	£ 3,445,861.0000
47-50 Mark Lane	£ 38,270,897.90	£ 1,148,126.94	£ 1,913,544.8950	£ 3,827,089.7900

Approach 2

SETTING THE TARGET: METHOD 2

One issue with Method 1 was that there was no relationship between the lowest, middle, and highest ratios across the four development metrics: that is, the smallest ratio multiplied by two different scale metrics would not lead to a the same target. To arrive at a place where the target for the cultural contribution of a development would remain consistent no matter how the scale was being measured, we tested a second method. In the second method to set the ratios for each of the scale metrics, we studied the actual cultural provision of the 20 developments in our dataset. Based on our research, we could identify three developments that have acceptable, good, and extraordinary cultural contributions.

Development	ACTUAL CULTURAL CONTRIBUTIONS OF THESE PROJECTS				
	sqm of cultural contribution (infra + contribs)	sqm of cultural contribution (infra)	sqm of cultural contribution (infra less public realm)	Value based on rental income	% of total est. rent income
Custom House	13,890.00	3,257.00	457.00	£ 424,818.06	2.43%
5 Snow Hill	5,798.00	-	-	£ -	
Salisbury Square	3,204.00	1,786.00	-	£ -	
City Tower and City Place House	4,759.00	2,070.00	-	£ -	
120 Fleet Street	2,887.00	2,887.00	1,331.00	£ 1,237,270.98	2.22%
115-123 Houndsditch	1,099.00	1,014.00	236.00	£ 219,380.88	0.44%
7 Devonshire Square	2,460.00	2,460.00	-	£ -	
14-21 Holborn Viaduct, 32-33 & 34-35 Farringdon Street	345.00	345.00	-	£ -	
61 - 65 Holborn Viaduct	1,984.00	1,984.00	973.00	£ 904,481.34	5.25%
Boundary House	11,428.00	2,454.00	410.00	£ 381,127.80	4.33%
Thavies Inn House	1,021.00	846.00	-	£ -	
1 Golden Lane	1,093.00	1,093.00	71.00	£ 66,000.18	0.56%
100 New Bridge Street	2,725.00	2,380.00	-	£ -	
6 Devonshire Square	515.00	515.00	-	£ -	
9-11 Angel Court	5,421.00	115.00	-	£ -	
20 Giltspur Street	1,580.00	1,229.00	195.00	£ 181,268.10	2.15%
65 Crutched Friars	3,345.00	3,345.00	3,101.00	£ 2,882,627.58	13.05%
85 Gracechurch Street	1,275.00	864.00	429.00	£ 398,789.82	1.42%
55 Bishopsgate	5,957.00	3,827.00	-	£ -	
47-50 Mark Lane	2,544.00	1,516.00	330.00	£ 306,761.40	1.37%

→ 'minimum' contribution

→ 'good' contribution

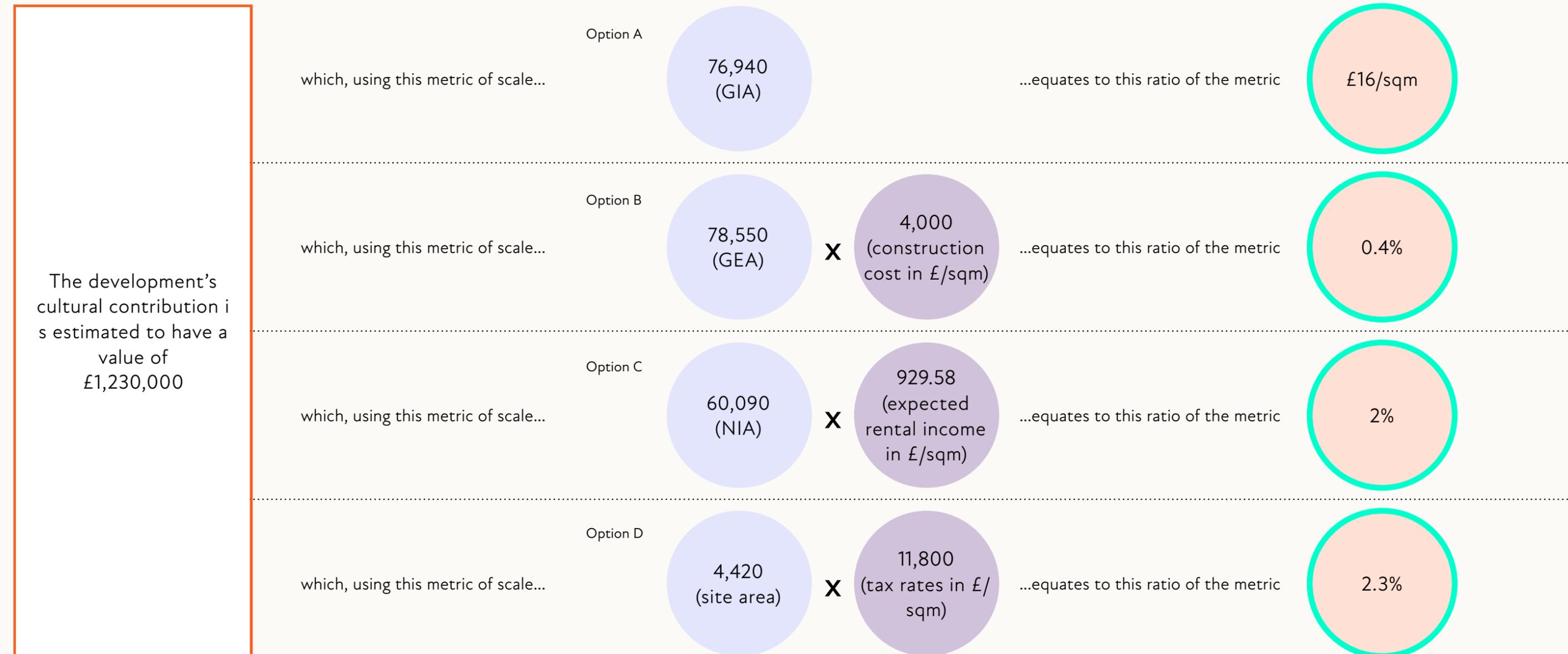
→ 'outstanding' contribution

Approach 2

SETTING THE RATIOS BASED ON 'MINIMUM'

120 Fleet Street was our “minimum” example. Using the estimated value of their cultural contribution (based on assumed rent loss) as a “target,” we “solved” for the ratios of each of the four scale metrics.

120 FLEET STREET

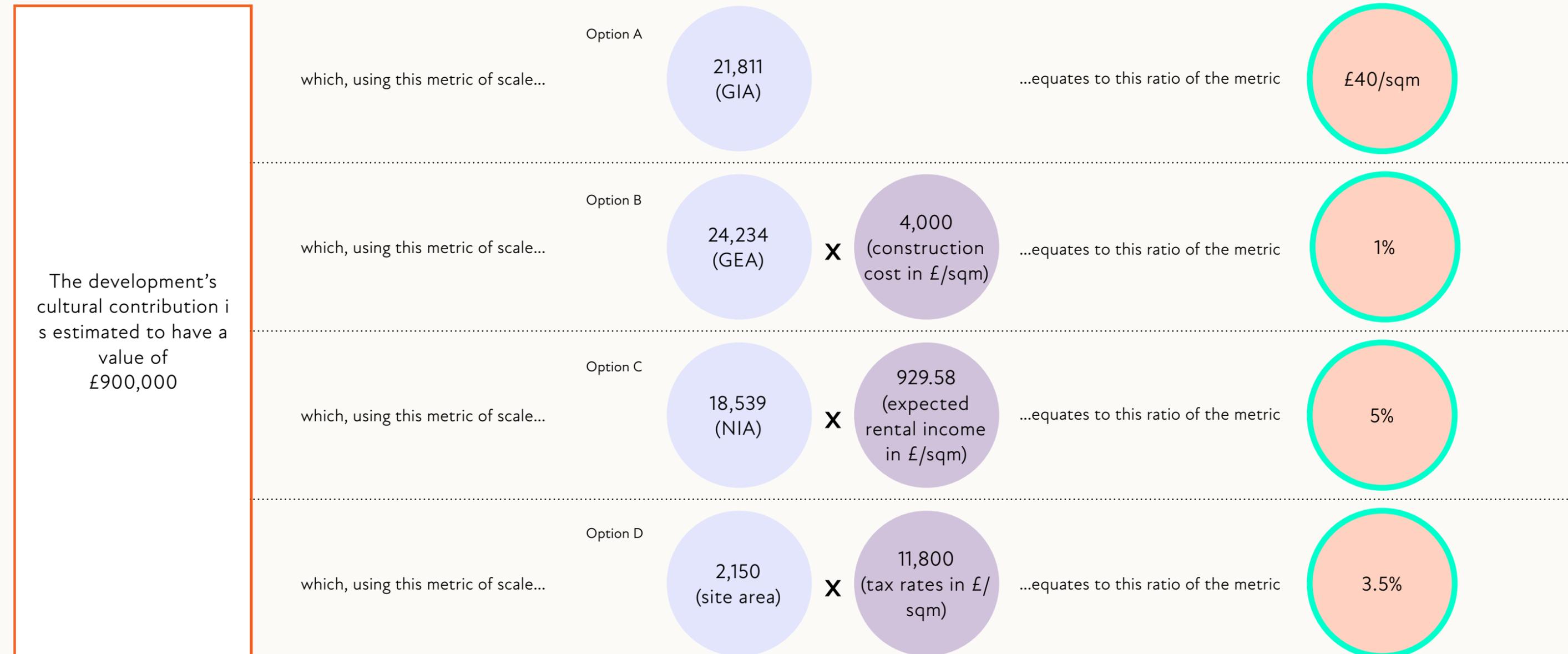


Approach 2

SETTING THE RATIOS BASED ON 'GOOD'

61-65 Holborn Viaduct was our "good" example. Using the estimated value of their cultural contribution (based on assumed rent loss) as a "target," we "solved" for the ratios of each of the four scale metrics.

61-65 HOLBORN VIADUCT

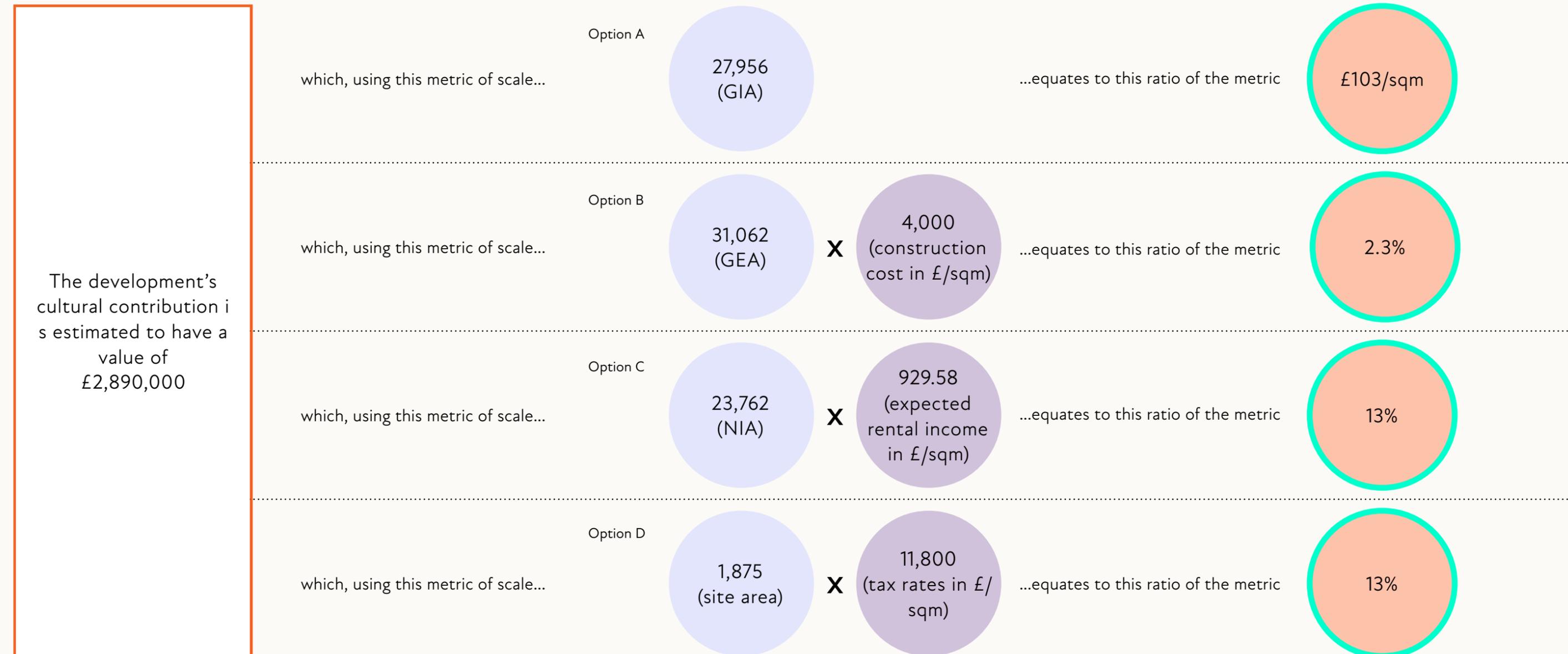


Approach 2

65 Crutched Friars was our “outstanding” example. Using the estimated value of their cultural contribution (based on assumed rent loss) as a “target,” we “solved” for the ratios of each of the four scale metrics.

SETTING THE RATIOS BASED ON ‘OUTSTANDING’

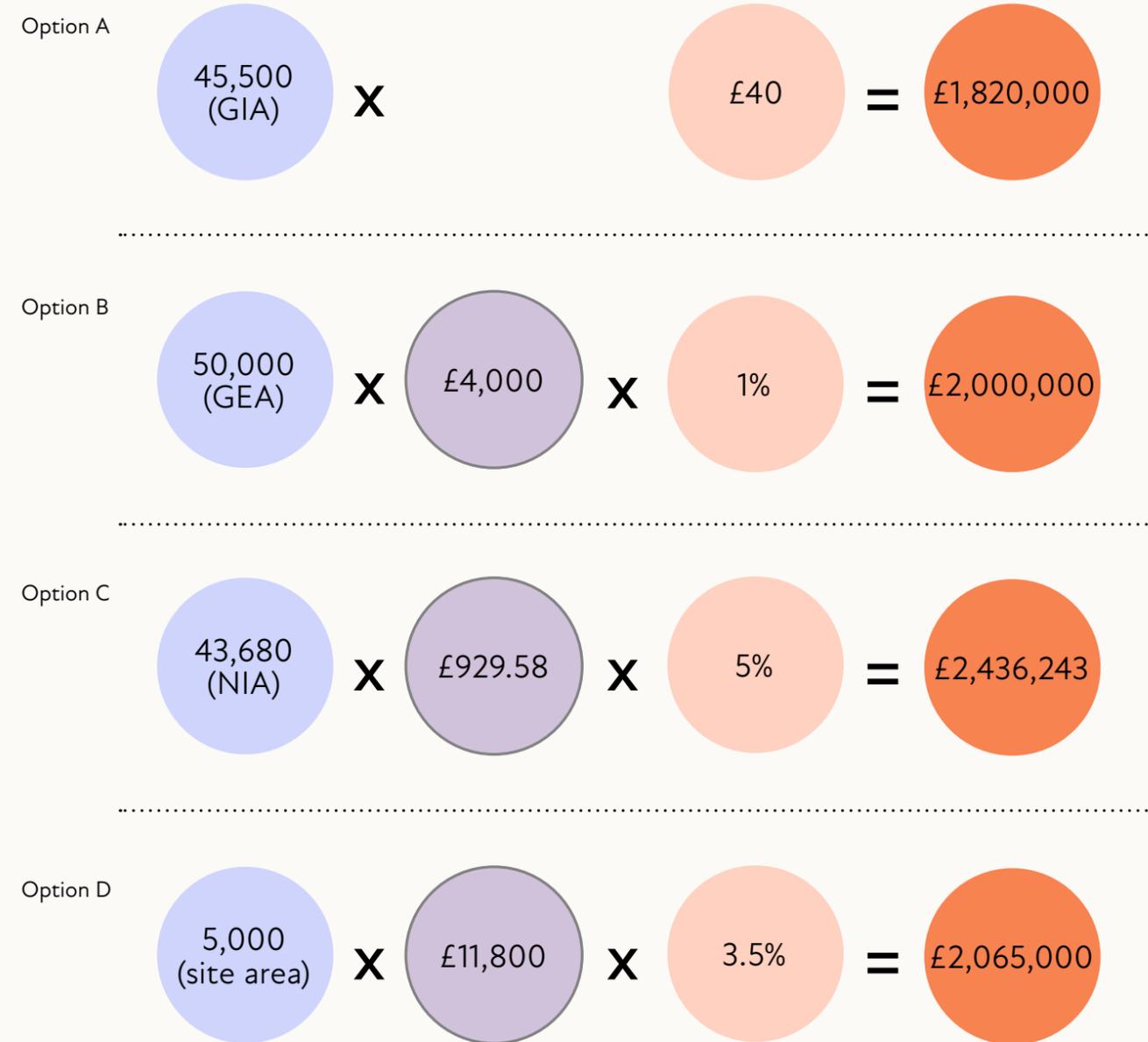
65 CRUTCHED FRIARS



Approach 2

SUMMARY

As shown here Method 2 of calculating the target ensures that the target holds relatively constant across the four different scale options. Below is the calculation of the target value of a hypothetical 50,000sqm building for a 'good' contribution.



Approach 2

SETTING THE TARGET BASED ON QUALITY SUMMARY

Scale metrics			Ratios based on 'quality'				
			minimum	good	outstanding		
Option A	GIA	X	X	£16/sqm	£40/sqm	£103/sqm	
Option B	GEA	X	construction cost in £/sqm	X	0.4%	1%	2.3%
Option C	NIA	X	expected rental income in £/sqm	X	2%	5%	13%
Option D	Site area (sqm)	X	tax rates in £/sqm	X	2.3%	3.5%	13%

We felt that Option A and Option C were the most promising ways to capture the scale of the building and set the target for cultural contribution. Option A resembles other CIL and S106 contributions. It is simple and robust, but it does not account automatically for changes in economic environment and inflation as well as Option C (unless it is subject to indexation). Option C is slightly more complex, as it has one additional variable than Option A; but estimated rental income is a vital part of developer's viability calculations and working with this metric ensures that the target calculation is responding to economic conditions and inflation.

There is a flexibility built in to how the target is applied to proposed developments. This accounts for the other contributions that developers are obligated to make (e.g. carbon offsetting, CIL), and the overall planning balance of the development. Given an initial assessment of the proposed development, and a review of the needs of its focal area, one of three different levels of contribution can be set: minimum, good, and outstanding.

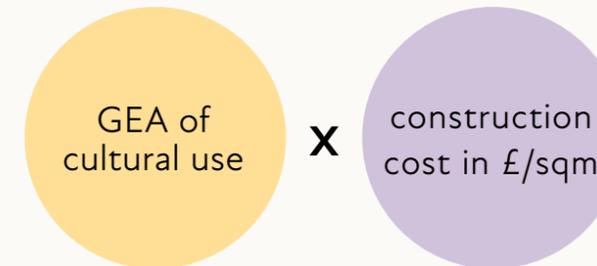
The application of minimum, good, or outstanding standards is up to the planning officer's educated judgment.

Approach 2

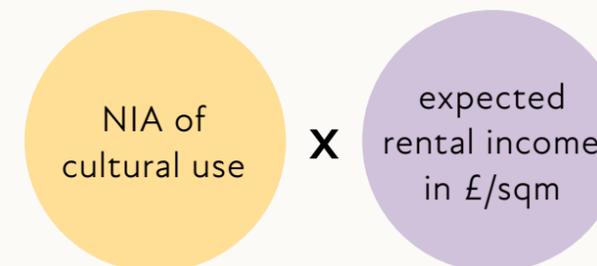
CALCULATING THE VALUE OF THE CULTURAL CONTRIBUTION

Satisfied with Method 2 and the ensuing ratios for setting the target (i.e. the left-hand side of the equation), we moved on to studying ways to calculate the value of a cultural contribution—the right-hand side of the equation. Calculating the value of a spatial contribution presents some challenges, given the non-monetary value that cultural venues often bring to spaces (see the Business Case for more on this topic). That said, the target-based approach

Option A works well for heritage-related contributions, or wayfinding, signage, or interpretive elements.



Option B works well for cultural infrastructure, like libraries, workspace, museums, etc.



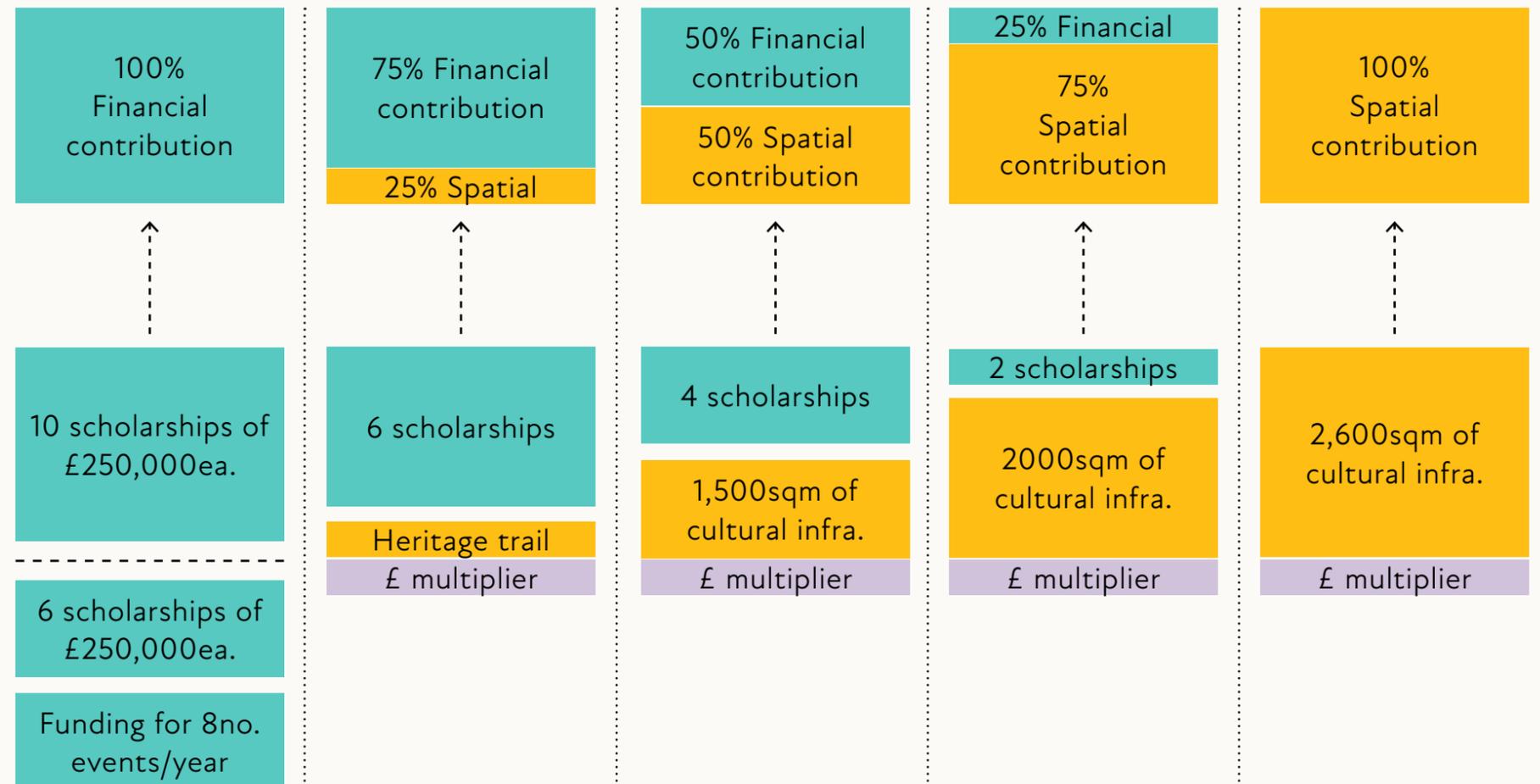
Approach 2

Using the target for a “good” contribution of a hypothetical 50,000sqm building, we explored various combinations fo financial and spatial contributions that together hit the target value of £2.

TESTING THE WAYS TO ACHIEVE THE TARGET THROUGH COMBINATIONS OF FINANCIAL AND SPATIAL CONTRIBUTIONS



PACKAGE OPTIONS



Scale benchmarks

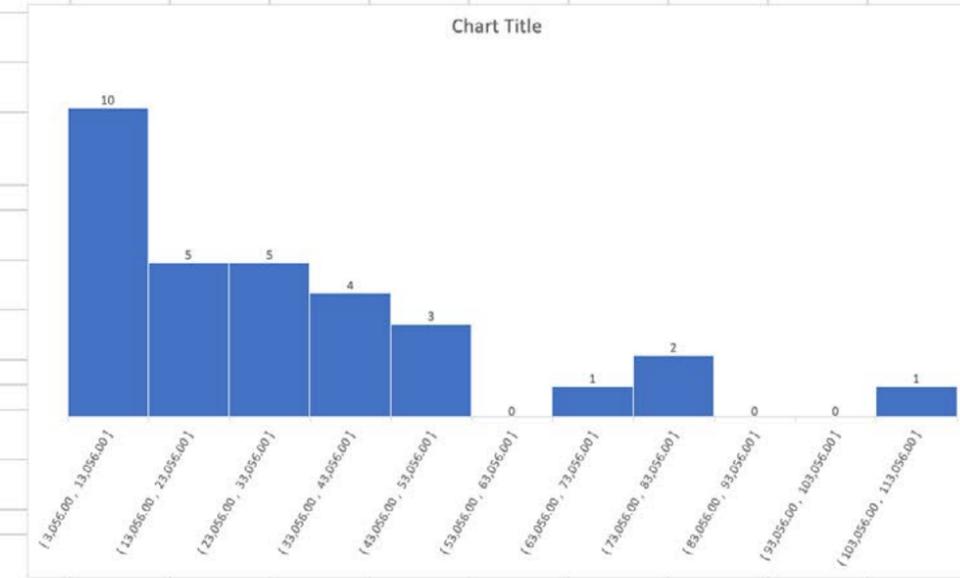
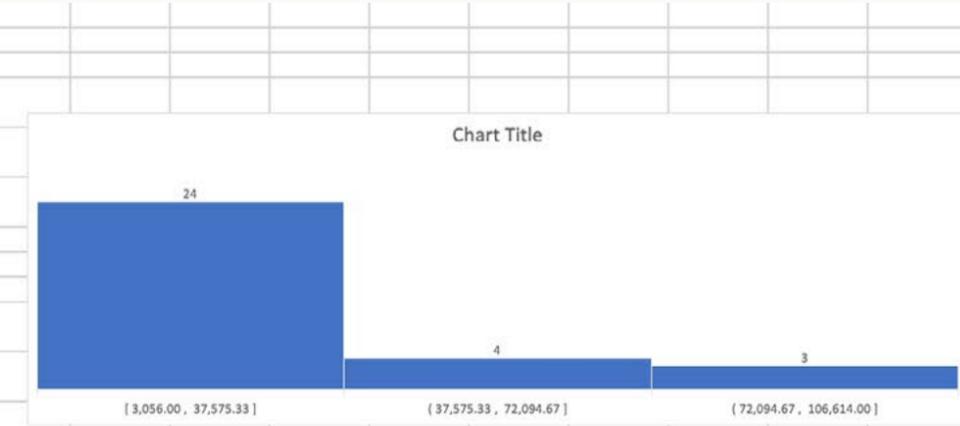
There was interest from the planning officers we spoke with to have a tier-based system for applying the formula. We studied the tier systems that other boroughs use to understand industry standards. We also studied 30 recent developments in the City of London to determine if there were patterns that emerged from City developments



Scale benchmarks

There was interest from the planning officers we spoke with to have a tier-based system for applying the formula. We studied the tier systems that other boroughs use to understand industry standards. We also studied 30 recent developments in the City of London to determine if there were patterns that emerged from City developments. The histograms below helped determine the “break points” for our tiers.

Ref. No	Address	Gross External Area	Gross Internal Area	Gross External Area uplift	Gross Internal Area uplift	Notes	Uplift ratio
20/00759/FULMAJ	74 Moorgate London EC2M 6SE		3,056.00		738.00		0.24
22/00426/FULL	6 Broad Street Place London EC2M 7JH	5129.00	4,543.00	605.00	581.00		0.13
21/00694/FULMAJ	63 - 66 Coleman Street And 35-39 Moorgate London EC2R 5BX		5,220.00		1369.00		0.26
21/00282/FULMAJ	New Liverpool House 15 - 17 Eldon Street London EC2M 7LD		5,865.00		5789.00		0.99
22/00158/FULMAJ	Princes Court 7 Prince's Street London EC2R 8AQ	7748.00	7,220.00	7748.00	902.00	*	0.12
22/00832/FULL	Smith & Williamson 25 Moorgate London EC2R 6AR		10,383.00		707.00		0.07
21/00658/FULMAJ	7 Devonshire Square London EC2M 4YH		10,789.00		2313.00		0.21
22/00867/FULMAJ	20 Giltspur Street London EC1A 9DD	11855.00	11,184.00	11855.00	2449.00	*	0.22
20/00773/FULL	Wood Street Police Station 37 Wood Street London EC2P 2NQ	13009.00	11,964.00	318.00	254.00		0.02
21/00885/FULMAJ	Thavies Inn House 3 - 4 Holborn Circus London EC1N 2HA		12,102.00		6077.00		0.50
21/00454/FULMAJ	100 And 108 Fetter Lane London EC4A 1ES		13,553.00		7161.00		0.53
20/00870/FULL	11 Pilgrim Street London EC4V 6RN	15530.00	14,607.00	15530.00	14552.00	*	1.00
22/00202/FULMAJ	Cripplegate House 1 Golden Lane London EC1Y 0RR	16599.00	15,542.00	16599.00	2485.00	*	0.16
20/00371/FULMAJ	150 Aldersgate Street 3-4 Bartholomew Place London EC1A	18534.00	17,174.00	6660.00	6188.00		0.36
21/00279/FULMAJ	Site Bounded By King William Street, Cannon Street, Abchurch Lane & Nicholas Lane London EC4N 7TW		18,490.00		1221.00		0.07
22/00748/FULMAJ	100 New Bridge Street London EC4V 6JA	24963.00	23,399.00	3377.00	3015.00		0.13
20/00581/FULMAJ	Northcliffe House 26-30 Tudor Street, 16-22 Bouverie Street London EC4Y 0AY		25,037.00		1102.00		0.04
21/00726/FULEIA	1 - 14 Liverpool Street And 11 - 12 Blomfield Street London EC2M 7AW		25,037.00		13979.00		0.56
22/00882/FULMAJ	Friary Court 65 Crutched Friars London EC3N 2AE	31062.00	27,629.00	31062.00	20316.00	*	0.74
22/01245/FULMAJ	47-50 Mark Lane London EC3R 5AS		30,218.00		13695.00		0.45
20/00671/FULEIA	55 Gracechurch Street London EC3V 0EE	38053.00	33,201.00	27608.00	22830.00		0.69
21/00272/FULMAJ	1-5 London Wall Buildings London Wall London EC2M 5PG		34,152.00		6239.00		0.18
21/00755/FULMAJ	14-21 Holborn Viaduct 32-33 & 34-35 Farringdon Street London EC1A 2AT	37391.00	35,948.00	37391.00	19004.00		0.53
22/01155/FULEIA	85 Gracechurch Street London EC3V 0AA	39557.00	37,492.00	30749.00	29457.00		0.79
21/00116/FULMAJ	City Tower And City Place House 40 - 55 Basinghall Street London EC2V	49119.00	46,085.00	17117.00	18116.00	**	0.39
22/00321/FULL	Woolgate Exchange 25 Basinghall Street London EC2V 5HA		46,861.00		914.00		0.02
21/00930/FULMAJ	1 Exchange Square London EC2A 2JN	61205.00	49,669.00	61205.00	9300.00	*	0.19
21/00622/FULEIA	115 - 123 Houndsditch London EC3A 7BU	78687.00	66,867.00	55347.00	52541.00		0.79
21/00985/FULMAJ	81 Newgate Street London EC1A 7AJ		75,866.00		52276.00		0.69
21/00538/FULEIA	120 Fleet Street London EC4A 2BE	82827.00	78,456.00	21605.00	19638.00		0.25
20/00869/FULEIA	2-3 Finsbury Avenue London EC2M 2PF	108800.00	106,614.00	108800.00	84152.00		0.79



*Denotes total GEA of the new proposed development instead of GEA uplift.
 **Taken from planning statement which suggests lower GEA uplift than the GIA uplift provided on the CIL form

03 Recommendations

- The formula should provide guidance for developers as well as allow planners to assess provision once submitted; we propose the target-based formula be used for both of these functions.
- The formula works through the interaction of two metrics that characterise the development: its scale and the assessment of its overall planning impact and balance. Specifically, the latter is described based on type of construction: refurbishment, demolition and substantial rebuild, and tall buildings. Both the size of the finished building and the type of project it is drives the quantum of cultural contribution expected of the project.
- We suggest framing contribution in “financial” and “spatial” terms, rather than “on site” and “off site,” as the former terms allow for more nuance and specificity in what is being provided.
- The disbursement of financial contributions, if secured through S106, would be managed via the City (as CIL money is). We think there is an opportunity for developers to satisfy the requirements of the CPF contributions through direct contributions to a specific organisation or programme (e.g. a bursary, an award, a fellowship, etc.). We understand that such contributions would not be enforceable via S106; a method of “submitting receipts” would need to be developed to ensure that the contributions are enough to satisfy the City. Direct contributions from developers to organisations, programmes, and events is an incentive to

contribute in and of itself: it allows such contributions to be part of their own ESG and CSR narratives, and to directly relate their contributions to impact measures that are broader than just square meterage delivered or amount of money levied.

- In certain cases, the open spaces secured through S106 can be counted toward the cultural contribution.
- We understand that in order for the formula to be a defensible planning requirement in S106, it may need to be based on sqm uplift rather than our proposed overall GIA. See below for comments on the relative pros/cons of each of these metrics.
- A few issues arise when guiding provision using uplift: uplift doesn’t always correspond to overall size of the completed building, so using it as a guidance mechanism may obscure the potential of large buildings to contribute significant cultural spaces. More generally, the formula does not actively incentivise significant spatial contributions, and reads as a more one-way tool to structure conditions. Some projects have a near-zero uplift, which would make the financial contribution very small, even if it’s a high-harm project. Using uplift to set the target would require using fairly large Pound values. The initial numbers proposed (£5/sqm uplift, £10/sqm uplift, £20/sqm uplift) are too small to levy significant financial contributions. A study of these rates across 20 major developments from 2020 - 2023 suggests that the average amount of cultural contribution using

this formula would be £136,000 per development. This represents 0.54% of average estimated rental income of a Class A office building in the Square Mile; 0.1% of average estimated construction cost of a building in the City; 10% of the average estimated value of 1500sqm of space in the City, and 5.4% of average annual operating cost of a small museum. Making the multipliers much larger (£75/sqm uplift, £100/sqm uplift, £150/sqm uplift) leads to higher average contributions, but doesn’t get around the fundamental issues of using uplift to direct cultural development. In a sense, using uplift as the driving metric for the formula would combine the two metrics discussed in bullet point 2.

- If it’s decided that uplift be used as the scale metric, we recommend re-running the calculations that have been established as part of this work.
- Whatever metric is used for scale (GIA or uplift), it is useful to tie the minimum, good, and outstanding ratio levels to the overall planning balance, as it ensures defensibility in S106 negotiations.

03 Recommendations (cont.)

- In the local plan evidence base, in response to feedback from the City of London team, we updated the materials to show that small-scale developments (under 10,000sqm) should only move forward with a financial contribution after a spatial contribution is explored. Our studies and conversations with both planners and developers supports the original approach, which favours financial contributions for small schemes. Firstly, financial contributions for schemes of this size are much more feasible from the developer's perspective; lettable space on the ground floor is already constrained in most of these schemes, and any spatial provision would necessarily be small and potentially poorly located. Secondly, many small, fragmented, and low-quality cultural spaces would not have the same positive impact as one larger cultural space or a pool of financial resources to support programming, events, or existing institutions. Foregrounding spatial contributions for projects under 10,000sqm misses critical opportunity to maximise the potential impact of developer contributions and threatens to create a fragmented landscape of underused spaces that do not meaningfully contribute to the cultural fabric of the City.

Questions

- Do we only count cultural infrastructure uses in the formula? Do we weight infrastructure and contributors differently?
- Does the formula get applied to schemes of all use classes?

04

Cultural Plans

Reviewing cultural plans and suggesting components and document structure

- 1 Final outputs: suggested components and documents structure
- 2 Process and methodology
- 3 Recommendations

01 Final outputs

SUGGESTED COMPONENTS AND
DOCUMENTS STRUCTURE

Cultural contribution documents to be prepared and submitted by developers

Planning submission

In response to planning conditions

DOCUMENT ①



Cultural Plan

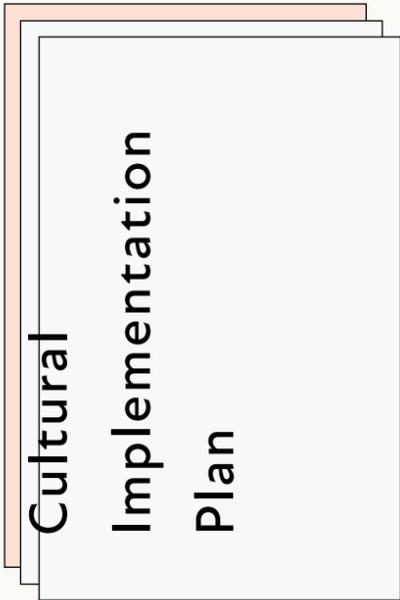
The Cultural Plan is a standalone document that presents proposal for cultural contribution(s). It is structured around suggested themes (outlined in following pages) handed out to developers as content guidance.

DOCUMENT ②

Vital Stats Form

The Vital Stats Form summarises qualitative and quantitative data on proposal to facilitate evaluation of proposal. Developers have to include their filled-in Vital Stats Form in their Cultural Plan to ease review process by planning officers.

DOCUMENT ③



Cultural Implementation Plan

The Cultural Implementation Plan is a standalone document to provide more in-depth information on management and operations of cultural contribution proposal(s). This document would be submitted following planning application decision in response to agreed S106 obligations. This document might not be required of all applications.

Document 1 ‘Cultural Plan’

SUGGESTED STRUCTURE AND CONTENT

Document structure	Purpose of section	Outline content	Supporting material
Chapter 0 Executive summary	Overview of proposed cultural contribution(s).	Vital Stats Form Summary of proposed cultural contribution(s)	Filled-in Vital Stats Form High-level description of cultural contribution proposal with supporting imagery (e.g. proposed views, spatial diagrams, etc.)
Chapter 1 Contextual response	Overview of contextual research and engagement and how this has helped shape the cultural contribution proposal(s).	Alignment with local context (incl. history, uses, users) Alignment with Focal Area vision and priorities Alignment with City Plan priorities and policies Alignment with feedback from engagement	Description of local context and how proposals are contributing to it Description highlighting alignment with focal area priorities Description highlighting alignment with City Plan and Key Area of Change (if applicable) priorities Description of engagement process and how the proposal aligns with feedback received to date
Chapter 2 Commitments and deliverables	Details on spatial and/or financial cultural contribution(s), including meanwhile projects.	<div style="display: flex; align-items: center;"> <div style="border: 1px solid orange; padding: 5px; margin-right: 10px;"> Spatial contribution: 1. Type of contribution (incl. meanwhile project) 2. Scale (sqm) 3. Location 4. Target audience, incl. engagement findings </div> <div style="font-size: 2em; margin: 0 10px;">+ / or</div> <div style="border: 1px solid orange; padding: 5px;"> Financial contribution: 1. Type of contribution 2. Amount (£) 3. n/a 4. Target audience, incl. engagement findings </div> </div>	<ol style="list-style-type: none"> Description of proposed cultural contribution(s). Include proposed meanwhile projects Quantitative information (sqm and/or £) and how it is meeting the required target. Proposed scale should be supported with relevant case studies and can be informed by GLA guidance Diagrams, 2d/3d orthogonal drawings, illustrative views that locate contribution(s) in relation to overall development Description of target audience and evidence of engagement with relevant communities and/or (local) cultural organisations
Chapter 3 Management plan	Details on operations and management of proposed contribution(s).	Operator(s) and/or Key Partner(s) Management structure Operations model Next steps / Action plan	Descriptions (incl. relevant experience) of suggested operator(s) and/or cultural partner(s) Organogram of governance structure High-level description on potential procurement, delivery and funding routes Timeline outlining key actions alongside key project milestones

Document 2 ‘Vital Stats Form’

TO BE INCLUDED IN ‘CULTURAL PLAN’

City of London Cultural Planning Framework
 Cultural contribution of Development Projects
 Vital Stats Form
 Updated: October 2023

Development information

Name / address	
Applicant	
Application reference number	
Project description	

Qualitative summary of cultural contribution

Author	
Predominant use of building	
Focal area	
Spatial cultural contribution	<i>Provide short description (max. 100 words)</i>
Financial cultural contribution	<i>Provide short description (max. 100 words)</i>
Retail provision	<i>Provide short description (max. 100 words)</i>
Affordable workspace provision	<i>Provide short description (max. 100 words)</i>
Potential operator/ key partner	<i>Provide short description (max. 100 words)</i>
Public realm amenity	<i>Provide short description (max. 100 words)</i>

City of London Cultural Planning Framework
 Cultural contribution of Development Projects
 Vital Stats Form
 Updated: October 2023

Quantitative summary of cultural contribution

Building Height (m)
Number of floors
Total proposed area (GIA) (sqm)
Total existing area (GIA) (sqm)
Total proposed area (NIA) (sqm)
Total existing area (NIA) (sqm)
Uplift (NIA) (sqm)
Ground floor (NIA) (sqm)
Total site area (sqm)
Spatial cultural contribution for consumption and production (sqm)
Spatial cultural contribution for community use (ground floor public space, roof terrace, community spaces) (sqm)
Spatial contribution for cultural contributors (hotel, retail, F&B) (sqm)
Financial cultural contribution (£)

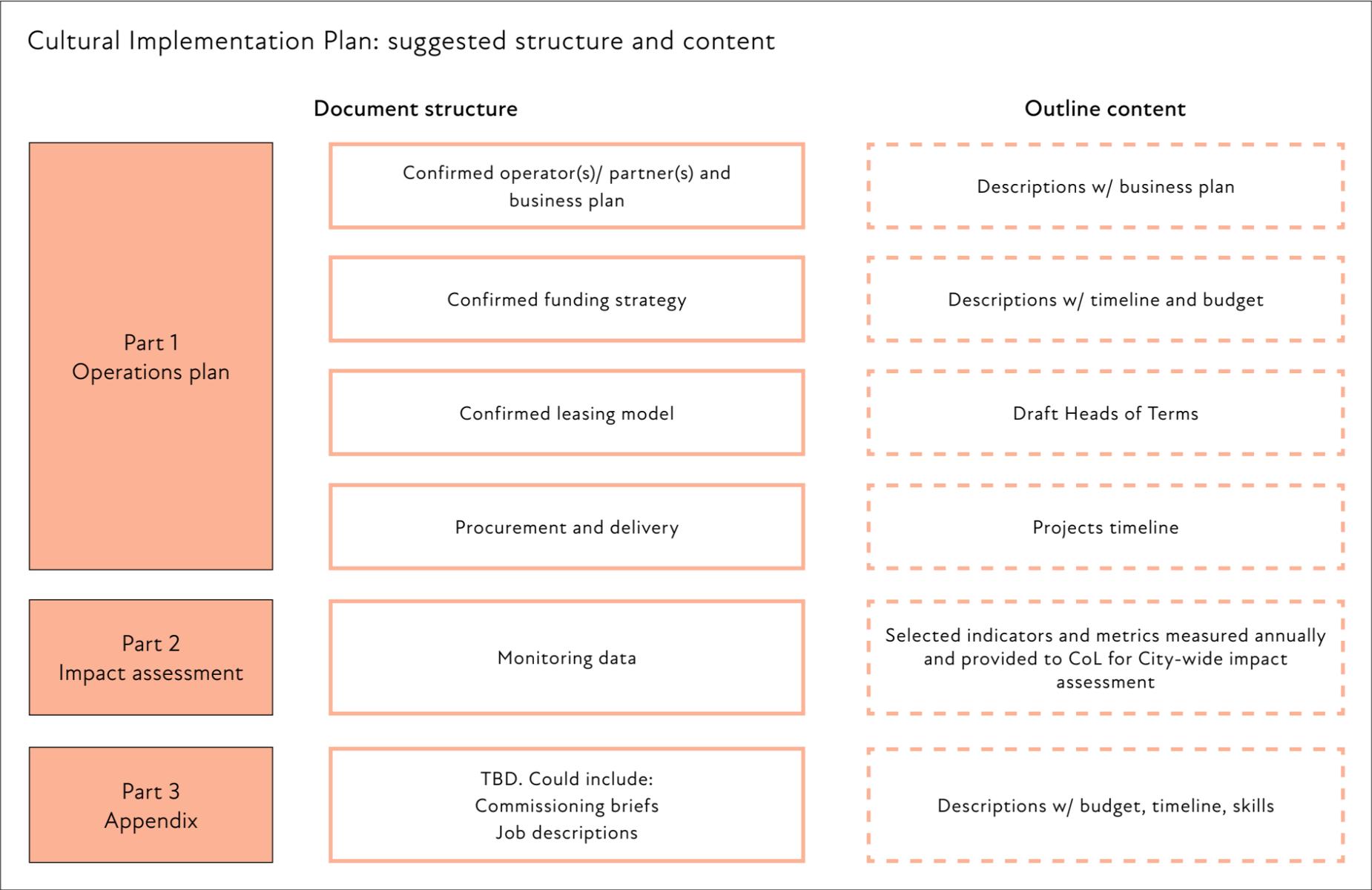
Document 3 ‘Cultural Implementation Plan’

TO BE SUBMITTED DURING CONSTRUCTION STAGE IF APPLICABLE

The ‘Cultural Implementation Plan’ is an additional, short document providing further details on management and operations of the proposed cultural contribution(s). This document will be submitted in response to Section 106 conditions that often seek to get clarifications on operations and management.

It will provide more in-depth on:

- Operator(s) and business plan
- Funding strategy
- Leasing model (high-level HoT)
- Procurement and delivery
- Monitoring data (to support impact assessment)
- Appendix including details on: commissioning briefs, artists-in-residence programmes, job descriptions, apprenticeships programmes, etc.



02 Process and methodology

METHOD STATEMENT

- Assessed 20 Cultural Plans (from 2020 – 2023) qualitatively and quantitatively to understand how the documents were performing and what was secured through the process, analysing proposed offer and contributions.
- Qualitative review included deep-dives into Plans, DAS, and supporting planning material to understand quality of the process and thinking behind the provision, and the quality of the provision itself.
- Quantitative review included gathering data on the scale of the buildings and their cultural provision to understand if any patterns were emerging in what the cultural plans were delivering.
- Suggested three different document structures to ensure a higher quality and greater consistency in Cultural Plans: a standalone Cultural Plan document, a dedicated chapter of the DAS, or a form.
- Conducted developers' interviews and gained feedback on process of writing Cultural Plans, currently perceived as onerous.
- Responded to feedback, progressed with the standalone document option, and developed a table of contents to help ensure consistency in submissions.
- Suggested two additional helpful documents to be used by planners and developers as part of the process: a Content Checklist that developers can use while preparing the Plan, and the Vital Stats Form that will ensure that future quantitative analyses are much easier to conduct.

Reviewing cultural plans

1. Qualitative deep-dives into plans, DAS, and other planning materials to explore actual substance of proposal

2. Quantitative calculations to understand scale and patterns of cultural provision

65 Crutched Friars

Title	Cultural Plan
Reference number	22/00882/FULMAJ
Developer	DOMINVS GROUP
Author	Future City
Primary use	Student accommodation
Focal area	Fleet Street
Height	21 floors
Total area	31,062.00 sqm (GEA)
Evidence base	<ul style="list-style-type: none"> Cultural asset audit: yes Policy review: yes Engagement: yes, w/ local cultural stakeholders Other: historic context, demographics
Vision and principles	<ul style="list-style-type: none"> Key aim: be a critical conversation node Principles: Exchange / Corridor, Converse/Explore, Post-Colonial/Third Place
Cultural provision	<ul style="list-style-type: none"> 2,970 sqm to house new Migration Museum incl. gallery, event, offices, coworking and education spaces, and museum shop (Ground + Floors 1 + 2)
Retail provision	none
Aff. workspace provision	n/a
Operations model	<ul style="list-style-type: none"> Operator: 3 potential operators highlighted (migration museum secured since)
S106 agreement	Not published
Public realm amenity	<ul style="list-style-type: none"> New seating and planted areas by main entrance
Programme	/

CULTURAL PLANS

Key takeaways: successful use of Cultural Plan format. No reference to types of spaces provided within the Plan and further refined within DAS.



Proposed entrance to Migration Museum on Northumberland Alley



Proposed event space



Ground floor First Floor Second Floor

■ Entrance to cultural provision
 ■ Culture (migration museum including offices, event, co-working and education spaces)

Publica CITY OF LONDON CULTURAL PLANNING FRAMEWORK | WORKSHOP 1 FOR INTERNAL USE ONLY 18

230525_Col_Cultural Space Benchmarking

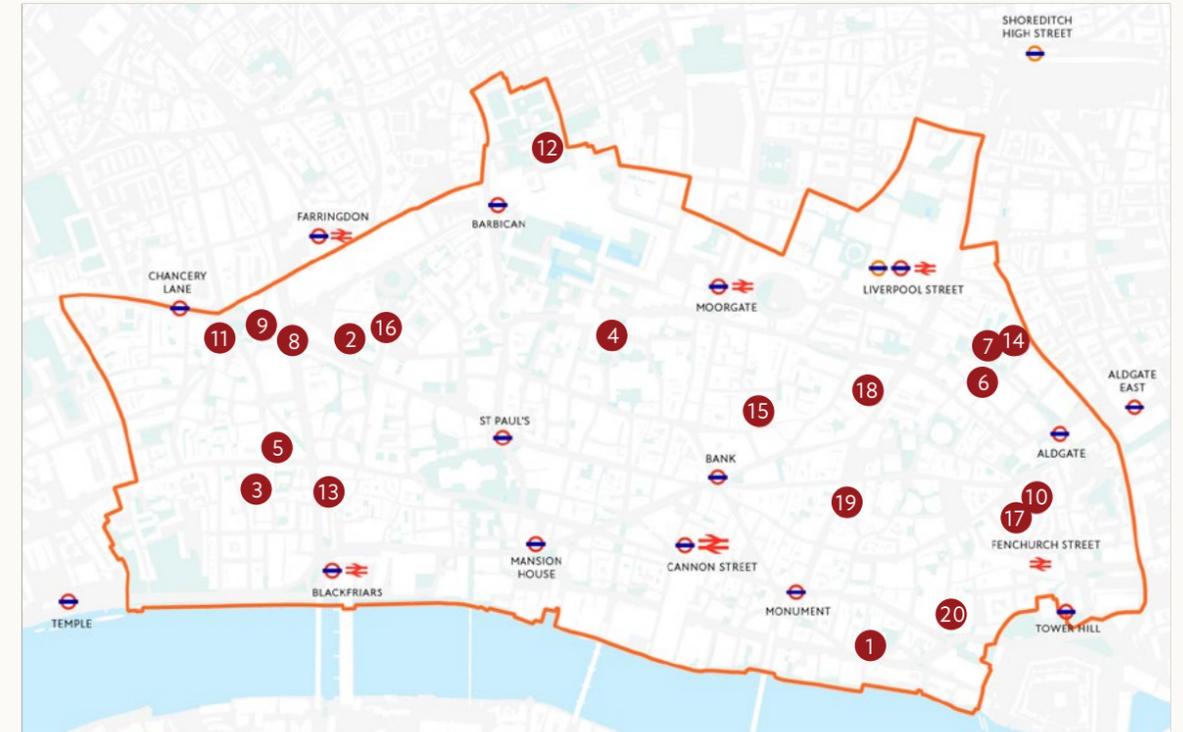
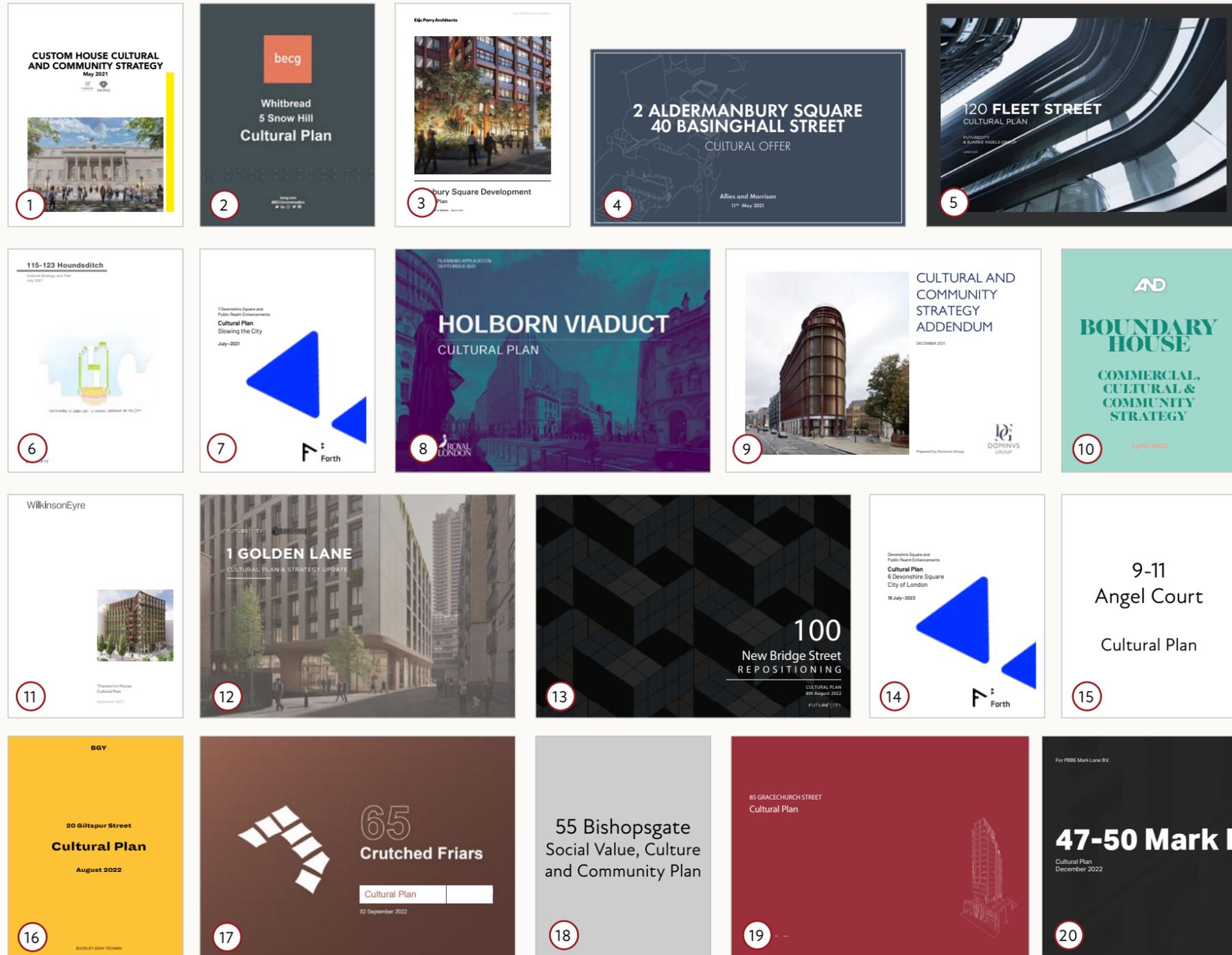
Scheme metrics													Cultural space contributions							
App reference number	Application date (received)	Focal area	Typology	Total Proposed floor space (GEA) sqm	Existing Floor Space (NIA) sqm	Proposed Floor Space (NIA) sqm	Uplift (NIA) sqm	Number of floors	Ground floor NIA (sqm)	Site Area (sqm)	Floor Area Ratio (Building Area/Plot Area)	Occupancy	Culture Cultural production / consumption / space sqm	Community Public Space (squares, new routes etc) sqm	Community Publicly accessible roof terrace sqm	Community Community space sqm	Total amount of culture and community use	Cultural contributions Tourism use (hotel) sqm	Any other publicly accessible uses (F&B, retail) sqm	Total amount of publicly accessible and cultural space sqm
20/00693/FULMAJ	Aug-20			24,578.00	13,980.00	15,935.00	1,955.00	5	3,765	9,500.00	2.59		457.00	2,800.00	0.00	0.00	3,257.00	9,316.00	1,317.00	13,890.00
20/00932/FULMAJ	Nov-20	Smithfield		6,369.00	3,259.00	5,798.00	2,539.00	8		1,312.00	4.85		0.00	0.00	0.00	0.00	0.00	5,798.00	0.00	5,798.00
20/00997/FULEIA	Dec-20	Fleet St		54,942.00	34,207.01	47,795.00	13,587.99	10		7,990.00	6.88		0.00	1,786.00	0.00	0.00	1,786.00	0.00	1,418.00	3,204.00
21/00116/FULMAJ	Feb-21			63,678.00	38,662.00	47,720.00	9,058.00	12		6,000.00	10.61		0.00	2,070.00	0.00	0.00	2,070.00	0.00	2,689.00	4,759.00
21/00538/FULEIA	Jun-21	Fleet St	Medium	78,549.00	39,060.00	55,450.00	16,390.00	21		4,418.00	17.78	5,460.00	1,331.00	1,000.00	556.00	0.00	2,887.00	0.00	0.00	2,887.00
21/00622/FULEIA	Jul-21			70,687.00	12,177.10	56,836.95	44,659.85	23		2,884.00	24.51		0.00	778.00	0.00	236.00	1,014.00	0.00	85.00	1,099.00
21/00658/FULMAJ	Aug-21			12,962.00	6,701.00	9,283.00	2,582.00	9	1,089.00	5,031.00	2.58		0.00	2,460.00	0.00	0.00	2,460.00	0.00	0.00	2,460.00
21/00755/FULMAJ	Sept-21	Fleet St	Medium	37,391.00	12,035.00	24,792.00	12,757.00	12		3,279.00	11.40	2,487.00	0.00	345.00	0.00	0.00	345.00	0.00	0.00	345.00
21/00781/FULMAJ	Sept-21	Fleet St		24,234.00	6,780.45	15,462.00	8,681.55	12		2,150.00	11.27		973.00	468.00	543.00	0.00	1,984.00	0.00	0.00	1,984.00
21/00826/FULMAJ	Sept-21			12,371.00	4,847.85	6,484.30	4,536.45	14		977.00	12.66		410.00	1,900.00	144.00	0.00	2,454.00	8,387.00	587.00	11,428.00
21/00885/FULMAJ	Oct-21	Fleet St		12,669.00	4,691.60	8,480.00	3,788.40	10		2,974.00	4.26		0.00	846.00	0.00	0.00	846.00	0.00	0.00	846.00
22/00202/FULMAJ	Mar-22			34,148.00	9,408.00	25,429.00	1,021.00	14	401.00	2,362.00	3.99		0.00	1,032.00	0.00	71.00	1,099.00	0.00	0.00	1,099.00
22/00748/FULMAJ	Aug-22			24,963.00	17,326.40	19,889.15	2,562.75	11		2,800.00	8.92		0.00	1,450.00	930.00	0.00	2,380.00	0.00	345.00	2,725.00
22/00753/FULMAJ	Aug-22			11,668.89	6,614.70	8,926.70	2,312.00	9	18,000.00	0.65			0.00	515.00	0.00	0.00	515.00	0.00	0.00	515.00
22/00860/FULMAJ	Sept-22			5,388.00	2,398.70	4,146.30	1,747.60	8		622.00	8.66		0.00	115.00	0.00	0.00	115.00	4,878.00	428.00	5,421.00
22/00867/FULMAJ	Sept-22			11,855.00	5,541.00	7,777.00	2,236.00	8		1,900.00	6.24		195.00	1,034.00	0.00	0.00	1,229.00	0.00	351.00	1,580.00
22/00882/FULMAJ	Sept-22	Fleet St		31,062.00	7,313.00	27,629.00	20,316.00	21		1,875.00	16.57		3,101.00	244.00	0.00	0.00	3,345.00	0.00	0.00	3,345.00
22/00981/FULEIA	Oct-22			131,556.00	15,934.00	77,641.00	61,707.00	22		2,903.00	45.32		0.00	2,344.00	1,483.00	0.00	3,827.00	0.00	2,130.00	5,957.00
22/01156/FULEIA	Nov-22			39,537.00	5,874.00	22,533.00	16,659.00	82		1,600.00	24.72		429.00	438.00	0.00	0.00	864.00	0.00	411.00	1,275.00
22/01245/FULMAJ	Dec-22			31,577.00	14,044.55	25,685.30	11,640.75	11		3,224.17	9.79		330.00	1,186.00	0.00	0.00	1,516.00	0.00	1,028.00	2,544.00

Red denotes figures derived from GIA (using NIA ratio of 85% of GIA)

Blue figures are for whole masterplan site areas (with multiple planning applications and buildings)

20 cultural plans in the City

Review and analysis of 20no. cultural plans submitted between 2020 and 2023, located throughout the Square Mile. Plans have been structured in based on submission date. The review outlined that cultural plans have improved in clarity of structure and quality of submission over time.



- 1 Custom House
- 2 5 Snow Hill
- 3 Salisbury Square
- 4 2 Aldermanbury Square, 40 Basinghall Street, City Tower and City Place House
- 5 Daily Express Building, 120 Fleet Street
- 6 115-123 Houndsditch
- 7 7 Devonshire Square
- 8 14-21 Holborn Viaduct
- 9 61-65 Holborn Viaduct
- 10 Boundary House
- 11 Thavies Inn House, 1-6 Holborn Circus
- 12 1 Golden Lane
- 13 100 New Bridge Street
- 14 6 Devonshire Square
- 15 9-11 Angel Court
- 16 20 Giltspur Street
- 17 65 Crutched Friars
- 18 55 Bishopsgate
- 19 85 Gracechurch Street
- 20 47-50 Mark Lane

Variety of proposals

A brief extract capturing the variety of proposals secured via Cultural Plans requirements. The ambition, scale and quality of the proposals fluctuate hugely based on the developers' ambition and the clarity and vision alignment across the design team.



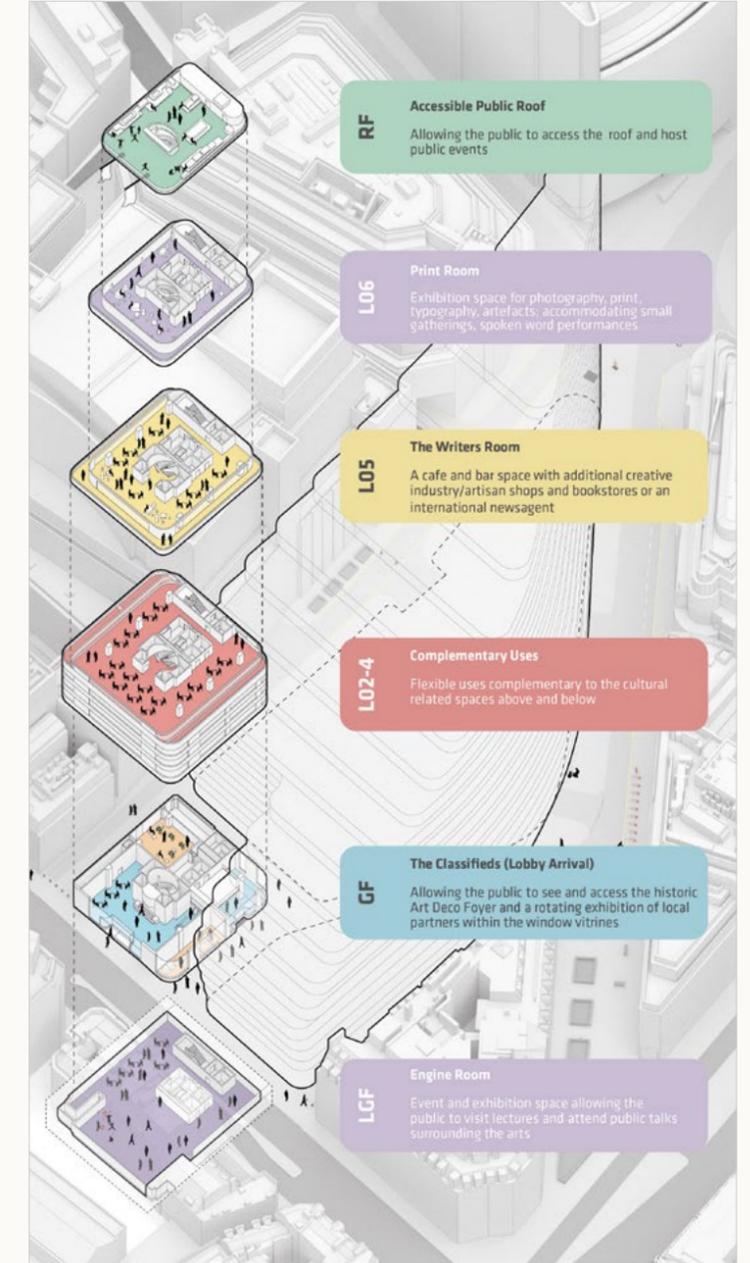
Custom House



5 Snow Hill



Salisbury Square



120 Fleet Street



Thavies Inn House



14-21 Holborn Viaduct



65 Crutched Friars



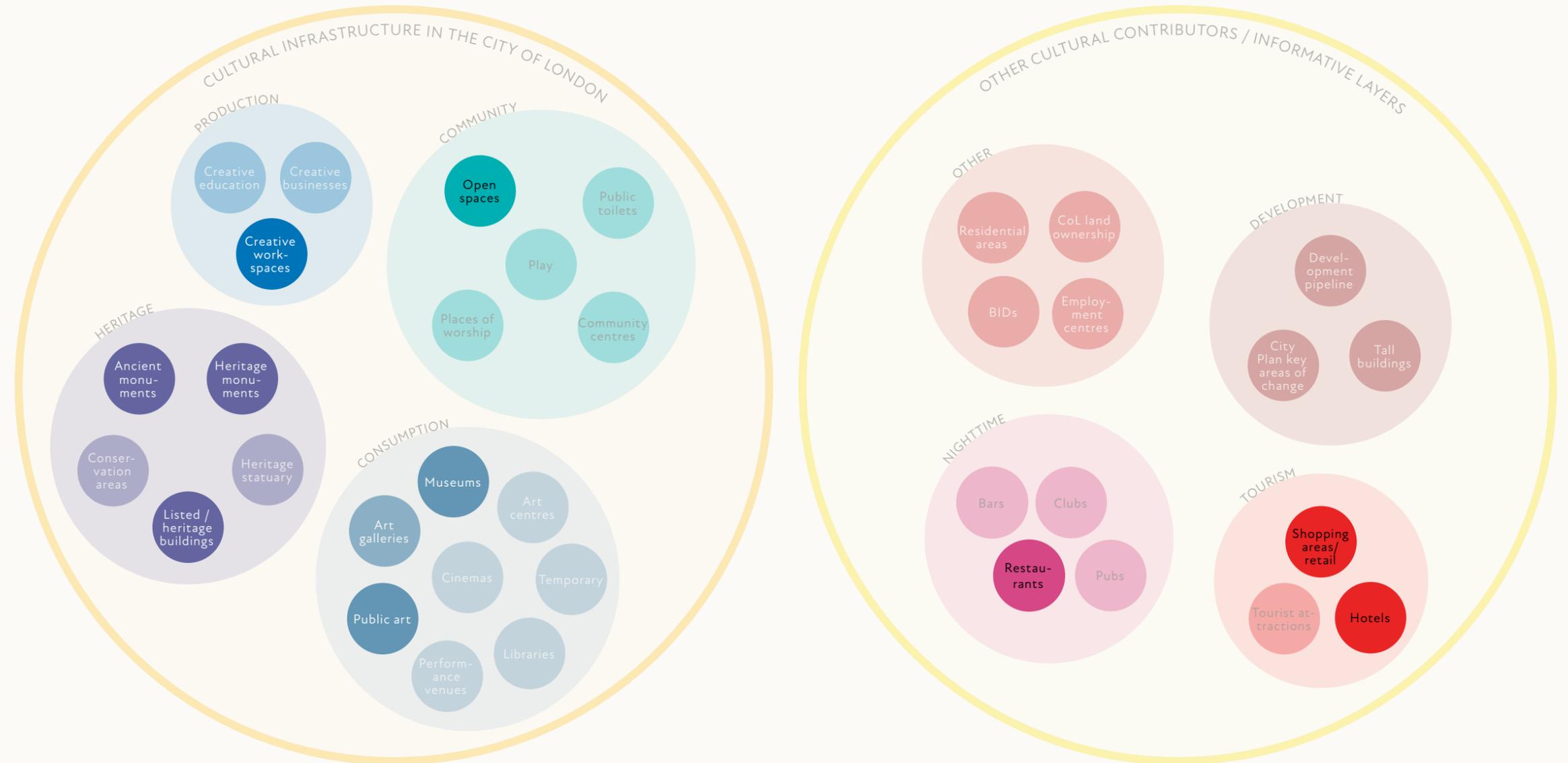
85 Gracechurch Street

Qualitative review: takeaways

CONTENT: DO CULTURAL PLANS PROVIDE CULTURE?

The unstructured nature of Cultural Plans documents often results in a lack of details and informations about the proposed provision. Throughout this analysis, we had to refer at numerous times to Design and Access Statements to understand the proposed location, scale and context of various cultural offers. The CPF therefore suggests that a Vital Stats form is submitted as part of the Cultural Plans, to outline key facts about the proposed offer.

We established a detailed picture of provided cultural offer across the 20 plans. This shows a variety of proposals but also a lack of provisions within the cultural production and community categories.



Qualitative review: takeaways

STRUCTURE: HOW TO SHIFT EMPHASIS?

Current CoL guidance for Cultural Plans structure was analysed alongside the reviewed 20 cultural plan. It became apparent that the structure outlined in CoL's guidelines did not ensure a streamlined process.

The current cultural plans documents revealed that a bulk of time and effort are spent on establishing a vision for cultural contributions, resulting in little information on proposed operations and management.

The CPF aspiration is therefore to move the emphasis of cultural plans from vision to operations and management to ensure and support a more robust offer.

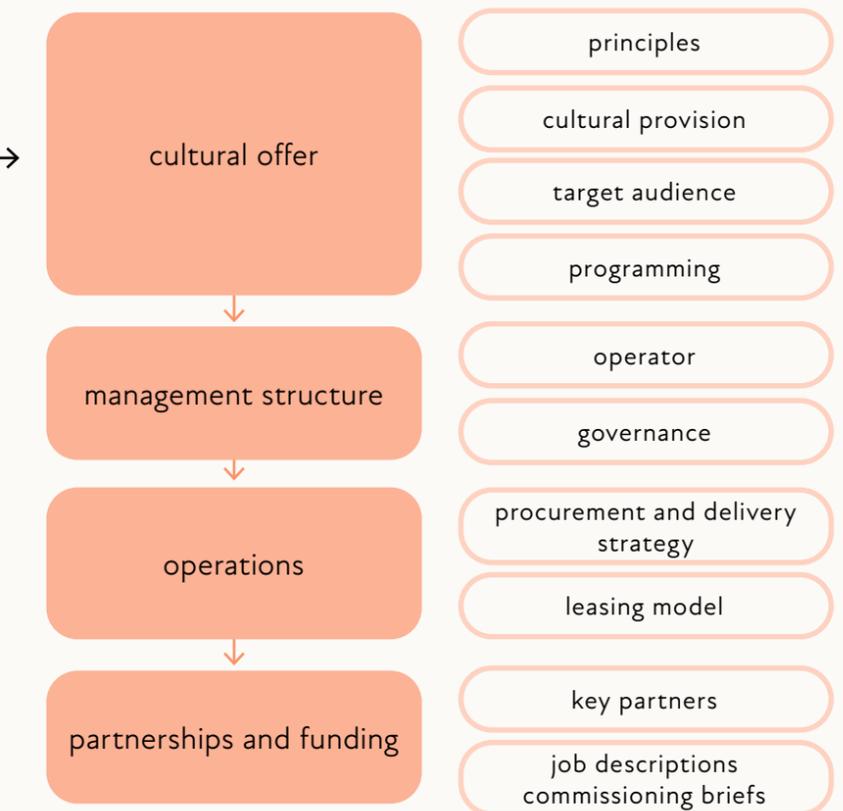
CoL internal guidelines

- Planning policy review
 - Cultural baseline analysis
 - Stakeholder consultation and community engagement
 - Cultural vision
 - Cultural project brief identifying cultural projects/ proposals
 - Detailed plan proposal along with a cultural programme where applicable
 - Cultural outcomes and deliverables
 - Delivery and management plan
- Source: 'How to develop a Cultural Plan v3'

From evidence base and vision...



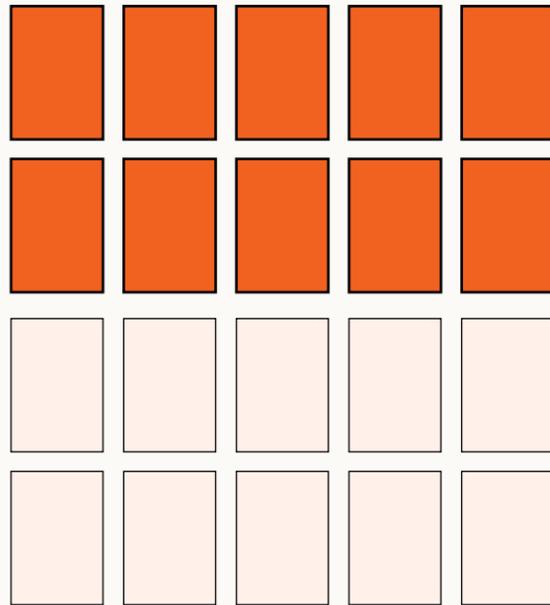
... towards management and operations



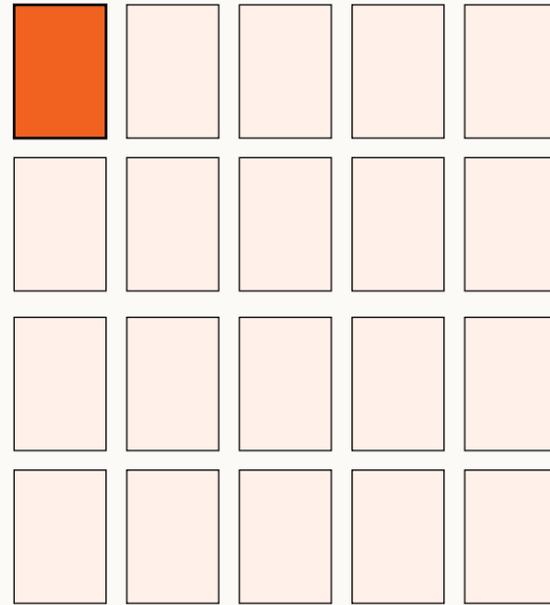
Qualitative review

Qualitative analysis of structure and content of Cultural Plans outlined a large discrepancy in process and content, impacting on the quality of proposed cultural contributions.

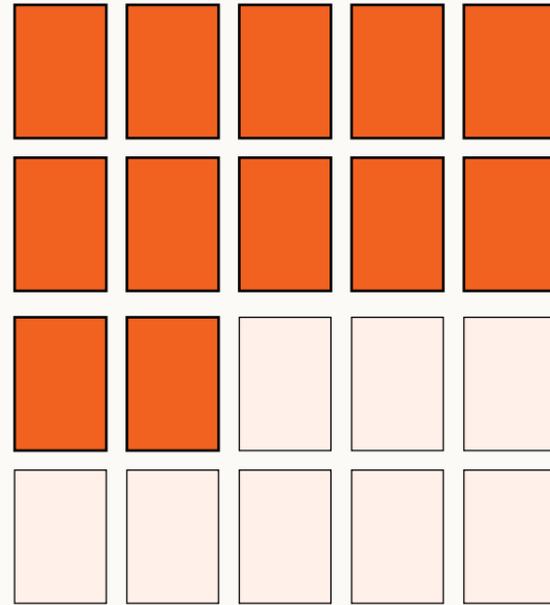
10 provide a **cultural audit** (of varying levels of robustness)



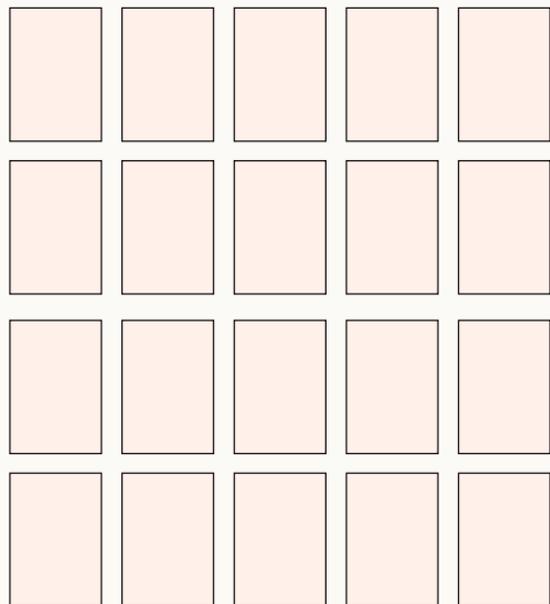
1 has **audited proposals from other CoL Cultural Plans**



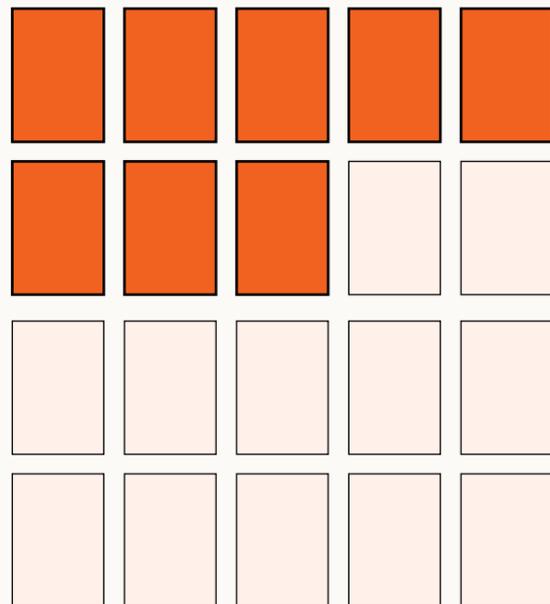
12 have conducted **stakeholder engagement**



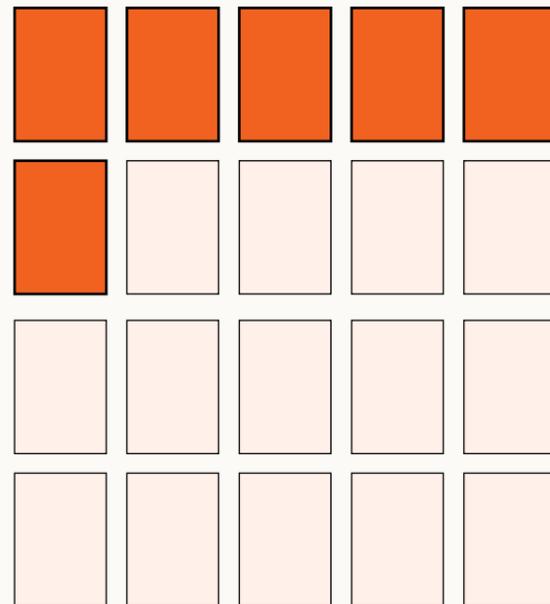
0 provide a **comprehensive area schedules* of cultural uses**



8 have highlighted **potential operators/partners**



6 provide **management and operations plans**



Qualitative review

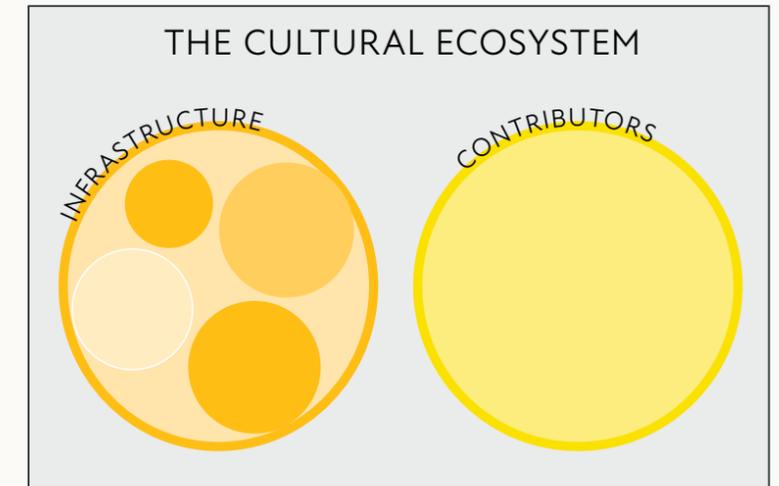
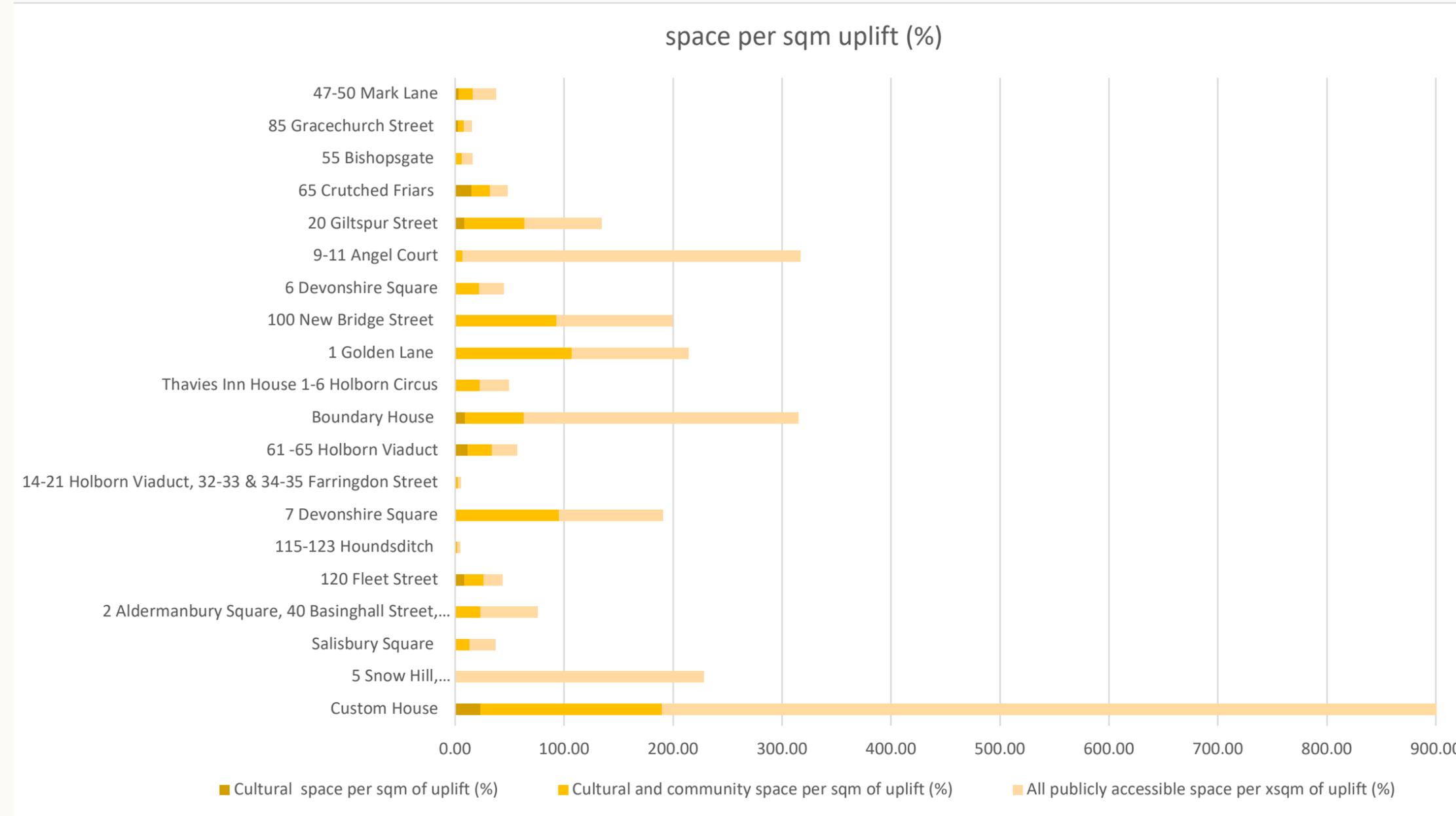
TAKEAWAYS

- An extensive and inspiring breadth of cultural proposals has emerged through the Cultural Plans initiative
- Cultural audit doesn't ensure understanding of surrounding context and appropriateness of proposal beyond the red line boundary
- Little consideration is given towards the ecosystem of uses created within the same building
- Lack of awareness of surrounding communities and target audience. When target audiences are highlighted, opening hours don't reflect schedule of target audience
- Nighttime uses and activity aren't considered when attempting to create a balanced cultural ecosystem
- Events and open spaces activation are suggested by a majority of plans yet programming ideas are hypothetical and do not commit to potential partners and operators
- Lack of commitment towards affordability of spaces will preclude growth of cultural production spaces
- Cultural Plans need to be read in conjunction with DAS to assess spatial qualities and suitability of cultural offer

Quantitative review

STUDYING SPATIAL TARGETS FOR CULTURAL PROVISION BASED ON DEVELOPMENT METRICS

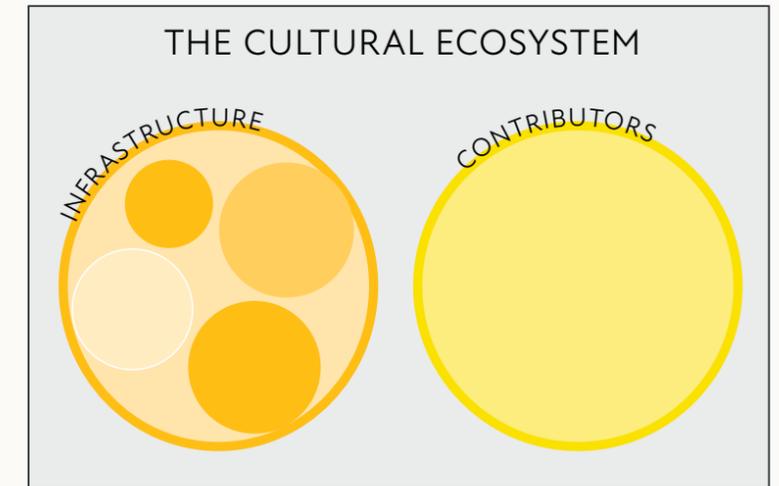
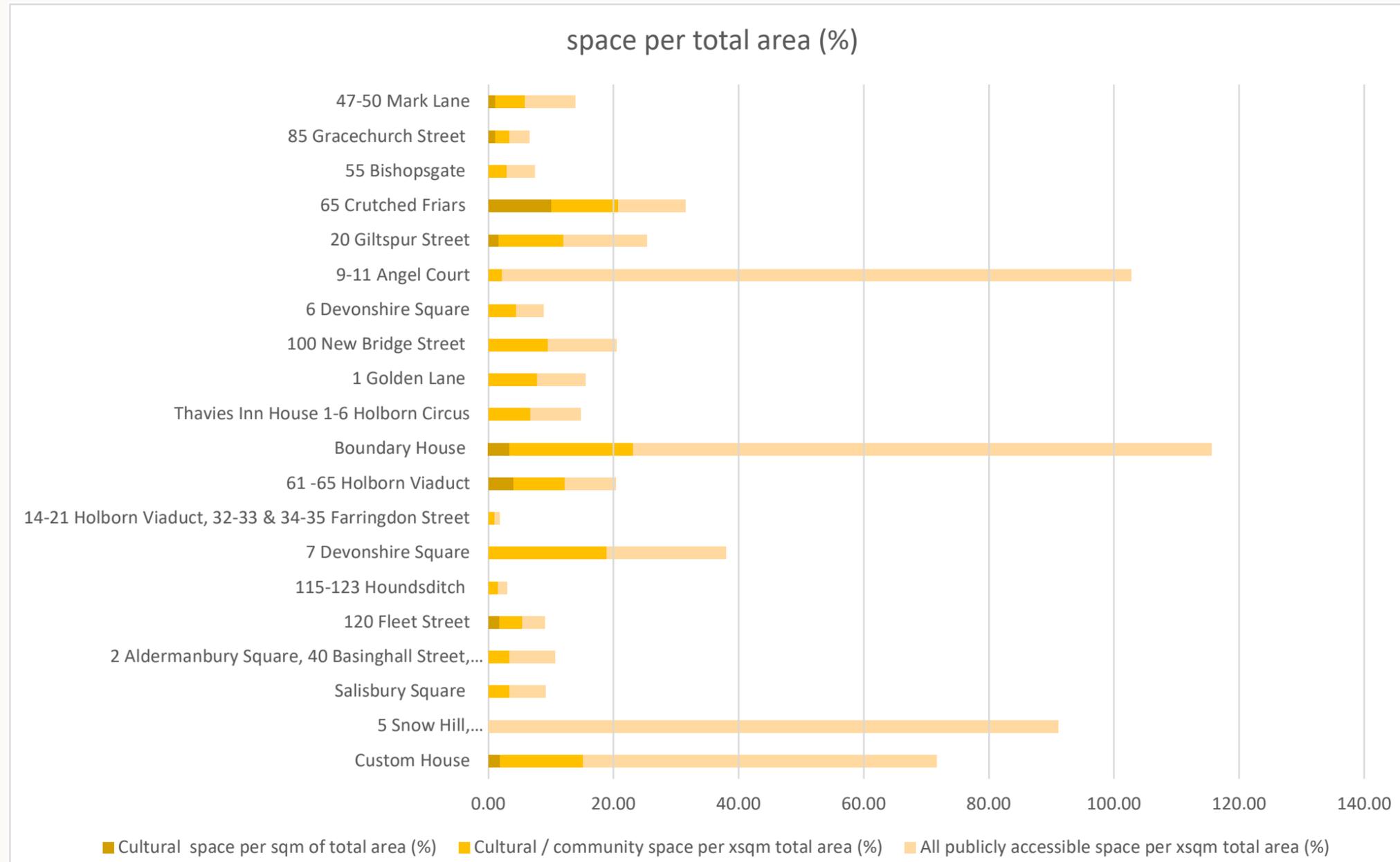
A bar chart of the ratio of secured cultural provision to square metres of uplift does not show a meaningful relationship to between this scale metric and what was secured through the existing planning process.



Quantitative review

STUDYING SPATIAL TARGETS FOR CULTURAL PROVISION BASED ON DEVELOPMENT METRICS

A bar chart of the ratio of secured cultural provision to total square metres of uplift does is slightly less variable across the 20 developments (particularly the ratio of cultural and community spaces, the middle value in the key).



Quantitative review

TAKEAWAYS

- No discernible patterns emerged across 20 development proposals
- Uneven data provision: not all bits of data are provided across all developments
- Can't control for quality: scoring higher on the calculations doesn't mean that the provision is better
- Contributions such as heritage interpretation isn't quantifiable

Planning submission document presented during workshops

TESTING VARIOUS FORMATS

Feedback on potential formats for cultural plan was collected throughout a series of workshops with a sample of cross-departmental Col's officers.

Officers reported that Cultural Plans should remain as standalone documents to facilitate review. Embedding Cultural Plans into Design and Access Statements would weaken the emphasis, importance and clients' responsibility in providing a meaningful cultural contribution.

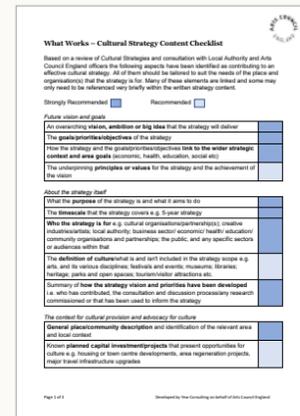
The format of a proposed 'filled-in' form and standardisation of Cultural Plans was dismissed as it was acknowledged that the illustrative content and supporting graphics are often used for dissemination of upcoming cultural proposals across departments.

Proposed structure and content outlined in the document therefore resemble the current expectations of Cultural Plans.

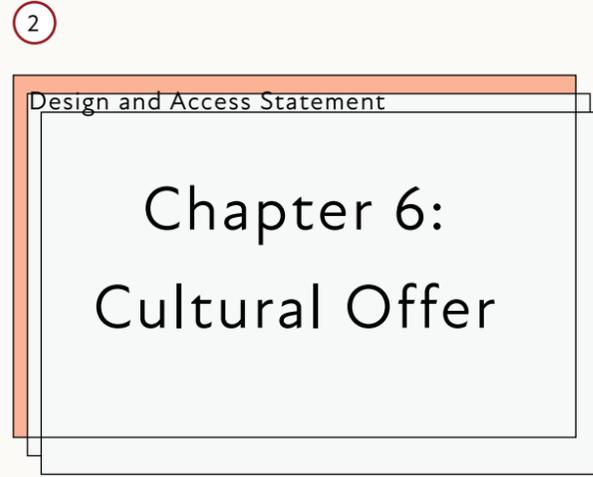


Standalone document with guidance on structure:

- Principles
- Cultural Offer: type and location
- Operations model
- Area schedule (total area, site area, external public realm, cultural offer area)

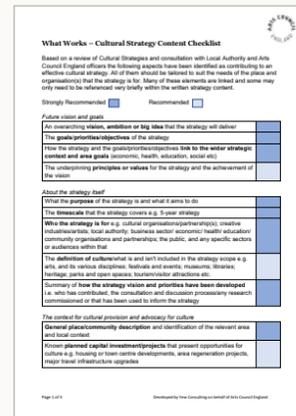


Scenario 1 resembles the status quo but includes more controls and specific informational requirements; it could include a questionnaire

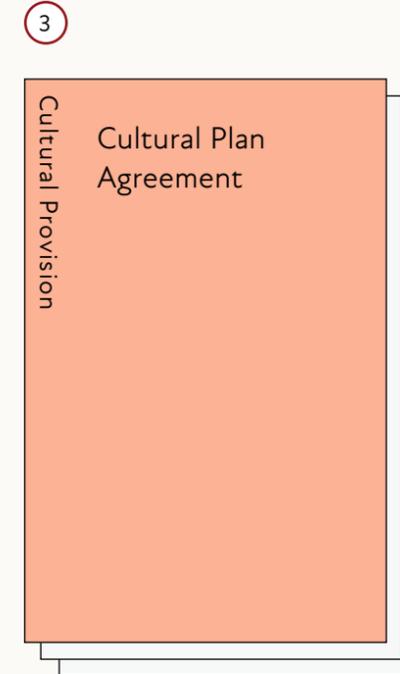


Dedicated chapter within DAS:

- Cultural Offer: type and location
- Operations model



As in scenario 1, a Content Checklist could be handed out to developers to ensure consistency of content



A questionnaire/ form to be filled in that sets out:

- Type of provision
- Type of culture
- Location of offer
- Type of operator
- Heads of Terms



Scenario 3 resembles filling in a S106 Form Agreement

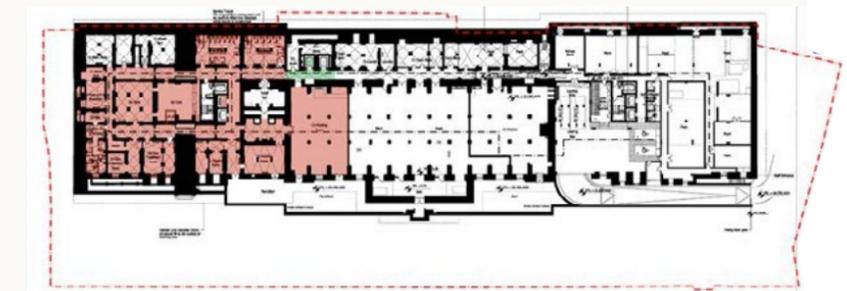
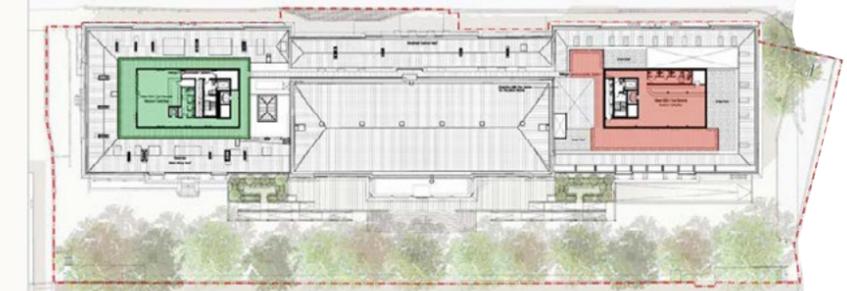
Cultural Plans review

FACTS SHEETS

1. Custom House
2. 5 Snow Hill
3. Salisbury Square
4. 2 Aldermanbury Square, 40 Basinghall Street, City Tower and City Place House
5. Daily Express Building, 120 Fleet Street
6. 115-123 Houndsditch
7. 7 Devonshire Square
8. 14-21 Holborn Viaduct
9. 61-65 Holborn Viaduct
10. Boundary House
11. Thavies Inn House, 1-6 Holborn Circus
12. 1 Golden Lane
13. 100 New Bridge Street
14. 6 Devonshire Square
15. 9-11 Angel Court
16. 20 Giltspur Street
17. 65 Crutched Friars
18. 55 Bishopsgate
19. 85 Gracechurch Street
20. 47-50 Mark Lane

Custom House

Title	Custom House Cultural and Community Strategy
Reference number	20/00631/FULMAJ
Developer	Cannon Capital and Gem Hotels
Author	Cannon Capital
Primary use	Hotel (Grade I listed building)
Focal area	Riverfront
Height	5 floors
Total area	24,578 sqm (GEA)
Evidence base	<ul style="list-style-type: none"> Cultural asset audit: yes Policy review: no Engagement: with GLA, PLA, City of London councillors and officers, Old Billingsgate Market Other: historical analysis
Vision and principles	<ul style="list-style-type: none"> 4 pillars: Heritage, Travel, Hospitality, The City Re-establishing Custom House as an important focal point on the river Sharing, educating and celebrating Custom House, its building, history and surroundings, and links with key buildings
Cultural provision	New museum and café on the ground floor
Retail provision	Café as part of cultural provision
Aff. workspace provision	N/A
Operations model	Management: museum to be managed by the hotel operator Operation: a heritage partner will curate the museum
S106 agreement	Not published
Public realm amenity	The new quayside area will see an increase of over 400% in public space along the Thames
Programme	Heritage partner to have access to rooms 24 times a year for talks, presentations or school education days. Open City.



5 Snow Hill

Key takeaways: Proposal needs presence at street level to ensure relevance to local users.

Title	Cultural Plan
Reference number	20/00932/FULMAJ
Developer	Whitbread Group PLC (hub by Premier Inn)
Author	Axiom Architects and BECG
Primary use	Hotel (Grade II listed)
Focal area	Barbican & Smithfield
Height	8 floors (AOD +40,960)
Total area	6,369.00 sqm (GEA)
Evidence base	<ul style="list-style-type: none"> Cultural asset audit: none Policy review: none Engagement: Culture Mile
Vision and principles	<ul style="list-style-type: none"> Based on Culture Mile 5 key objectives Public access to Grade II listed building
Cultural provision	<ul style="list-style-type: none"> retained reading room heritage interpretation gallery space
Retail provision	Cafe/ restaurant (Floor 1)
Aff. workspace provision	none
Operations model	<ul style="list-style-type: none"> Management structure: none Operator: none
S106 agreement	<ul style="list-style-type: none"> Draft cultural plan and visitor management plan required 12 months before completion Exhibition space, facilities and restaurant to be retained for the life of the building
Public realm amenity	none
Programme	/

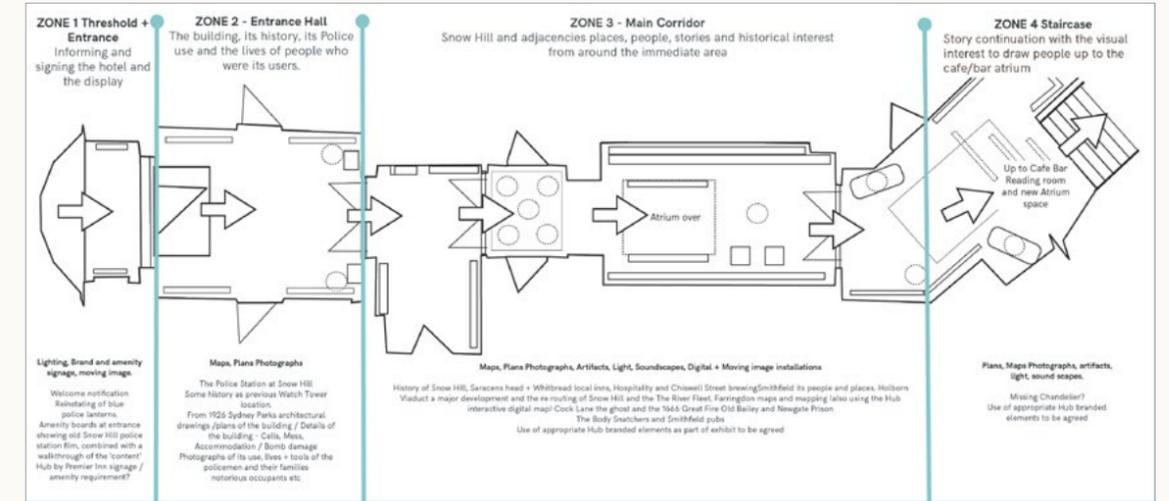


First floor



Ground floor

- ▶ Entrance to cultural provision
- Culture
- ▶ Entrance to retail provision
- Retail
- Publicly-accessible area
- Public toilets



Ground floor - zoning plan

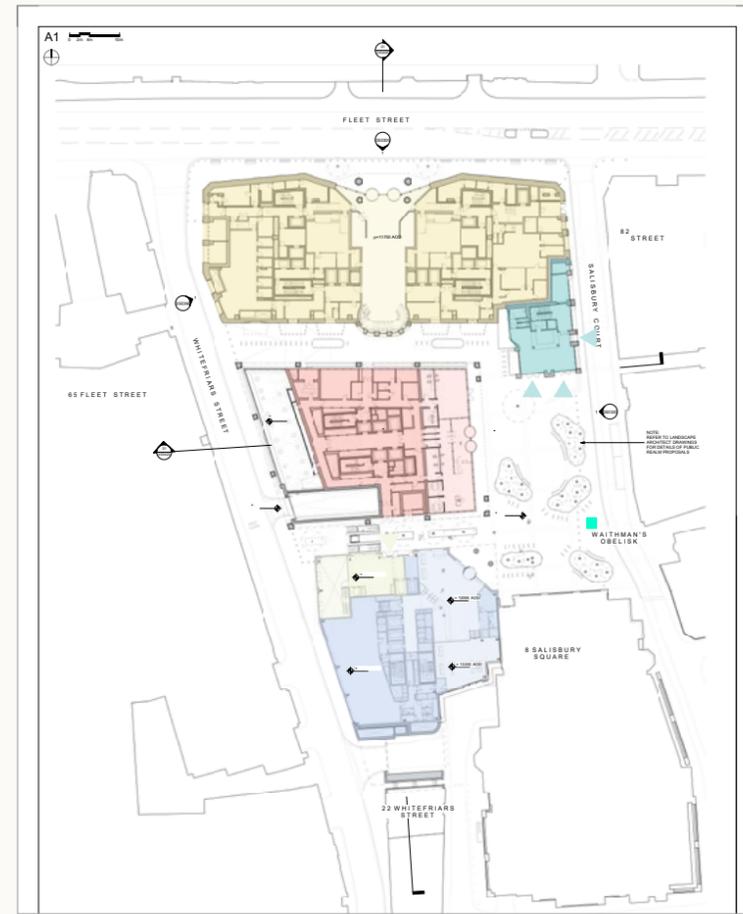


View from entrance

Salisbury Square

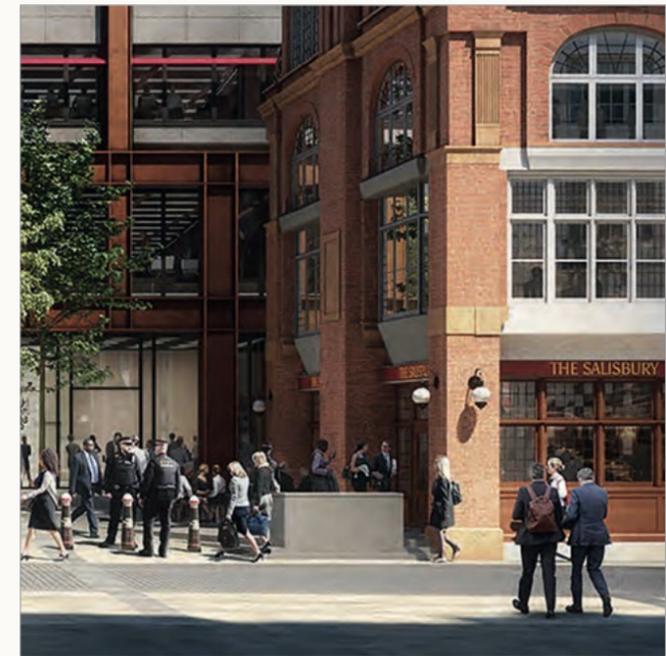
Title	Cultural Plan (+ Public Art Proposal and Cultural Plan chapter w/in DAS)
Reference number	20/00997/FULEIA
Developer	City of London Corporation
Author	Eric Parry Architects
Primary use	Courts and HQ for CoL Police
Focal area	Fleet Street
Height	10 floors
Total area	54,942.00 sqm (GEA)
Evidence base	<ul style="list-style-type: none"> Cultural asset audit: none Policy review: none Engagement: Museum of London
Vision and principles	<ul style="list-style-type: none"> Based on Culture Mile 5 key objectives Public access to Grade II listed building
Cultural provision	<ul style="list-style-type: none"> heritage interpretation (incl. blue plaques) public art event space (outdoor) retained Grade II listed building into public house
Retail provision	<ul style="list-style-type: none"> 1no. retail unit at ground level
Aff. workspace provision	none
Operations model	<ul style="list-style-type: none"> Management structure: none Operator: Museum of London (potential)
S106 agreement	<ul style="list-style-type: none"> S106 not published planning condition for preservation of existing blue plaques and statues on site and a new sign detailing the history of Salisbury Square planning condition for submission of public art strategy, new commemorative plaques and cultural plan with contextual analysis and vision
Public realm amenity	New public realm with planting and seating

Programme	<ul style="list-style-type: none"> Annual lectures Educational and visitor tours and open access to court proceedings
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Ground floor

- ▶ Entrance to cultural provision
- ▶ Entrance to retail provision
- Culture (retained Grade II building as a public house)
- Culture (retained monument)
- Retail



Proposed public house



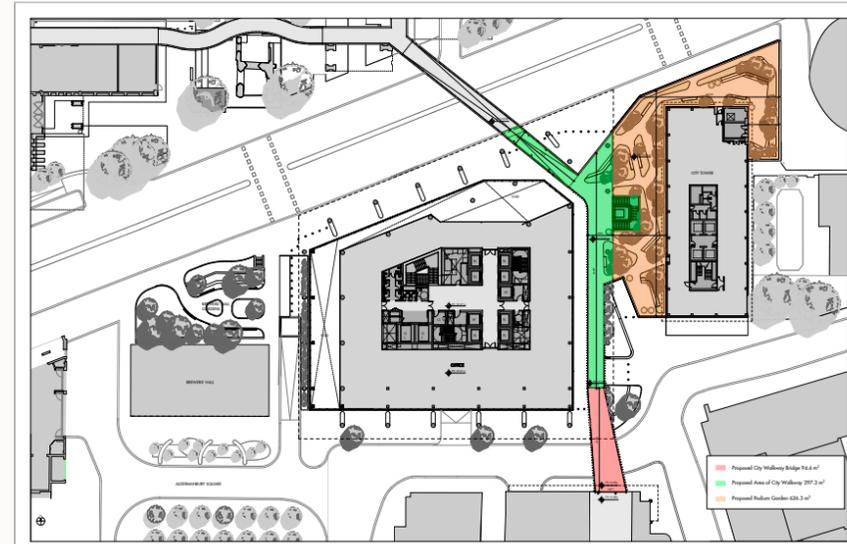
Public realm rendered plan and diagram

Key takeaways: public realm potential as a space for events in collaboration w/ local cultural stakeholders.

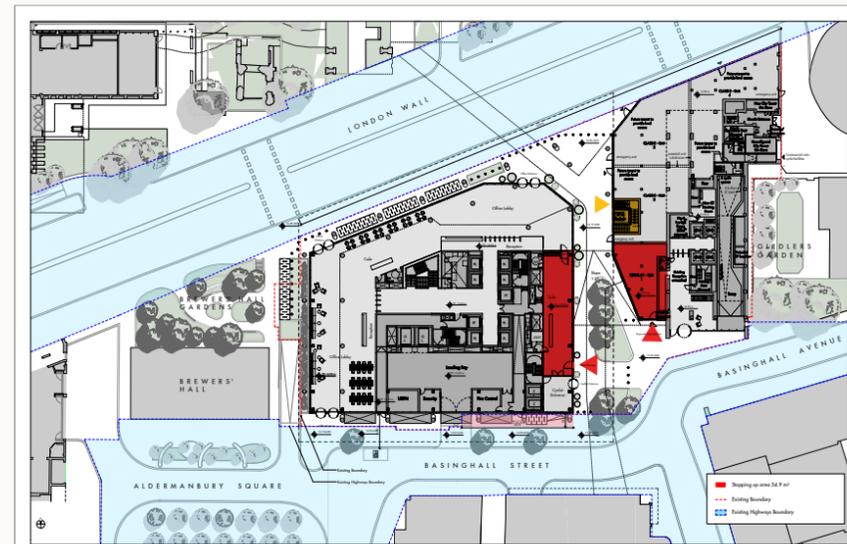


2 Aldermanbury Square, 40 Basinghall Street, City Tower And City Place House

Title	Cultural Offer
Reference number	21/00116/FULMAJ
Developer	Knighton Estates Limited
Author	Allies and Morrison
Primary use	Commercial
Focal area	St Paul's
Height	12 floors
Total area	63,678.00 sqm (GEA)
Evidence base	<ul style="list-style-type: none"> Cultural asset audit: high level Policy review: high level Engagement: none
Vision and principles	<ul style="list-style-type: none"> Building on Culture Mile and CoL Cultural Strategy 3 aims: visually stimulating public spaces, places for events, building's fabric to contribute to user experience
Cultural provision	<ul style="list-style-type: none"> Public art 3no. Class E units w/ potential community focus - no info in cultural plan
Retail provision	<ul style="list-style-type: none"> 2no. units at ground level
Aff. workspace provision	Affordable workspace Plan submitted as part of S106
Operations model	<ul style="list-style-type: none"> Management structure: none Operator: none
S106 agreement	Not published
Public realm amenity	<ul style="list-style-type: none"> Enhanced public realm at ground level Public garden to host events at podium level
Programme	/



First floor



Ground floor

- ▶ Entrance to retail provision
- ▶ Entrance to podium garden
- Retail
- Public podium garden

Key takeaways: retail provision can and should be meaningful in line with affordable workspace Plan. Public entrance to podium garden needs presence at street level to ensure feeling of welcomeness