

# Protecting theatres for everyone



Our Ref.: TC/7934

28 February 2018

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## Draft London Plan

The Theatres Trust welcomes the opportunity to provide comments on the draft London Plan (December 2017).

The Trust believes the planning system should facilitate development and change in a way that promotes and engenders culture. While we recognise the need and importance of providing housing to meet London's acute need, and of regeneration, this should not come at the expense of London's diverse cultural mix. The new London Plan provides an opportunity to emphasise the role of culture as one of the four pillars of sustainable development within planning in London, and ensure the planning system maximises the benefits of cultural activity to social well-being, sustainable communities and London's economy.

### About the Theatres Trust:

The Theatres Trust is the national advisory public body for theatres. We were established through the Theatres Trust Act 1976 'to promote the better protection of theatres' and provide statutory planning advice on theatre buildings and theatre use in England through The Town and Country Planning (Development Management Procedure) (England) Order 2015, requiring the Trust to be consulted by local authorities on planning applications which include 'development involving any land on which there is a theatre'..

The Trust is also involved in the preparation of Local Plans and the development of planning legislation, policy and guidance. We encourage the inclusion of local policies that support cultural facilities and cultural wellbeing. We identify Theatre Buildings at Risk and provide advice and assistance to empower owners and community groups to purchase, restore and/or reuse theatre buildings to create opportunities for local cultural participation, to find sustainable new uses, and to use culture as a catalyst for wider regeneration in their communities.

### Theatres Trust

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We are often the only source of expert advice on theatre use, design, conservation, and planning matters available to theatre operators, local authorities and official bodies. Whilst our main objective is to safeguard and promote theatre use, or the potential for such use, we also seek to provide impartial expert advice to establish the most viable and effective solutions for proposed, existing and former theatre buildings at the earliest possible stages of development.

### **Overarching comments on the draft London Plan:**

The draft Plan appears to be very strong in its recognition of the role arts and culture have in improving places and quality of life, and of drawing in visitors which supports London's wider economy. It provides protection, protection and support for arts and culture and of the venues that facilitate participation in and enjoyment of arts and culture. It represents a significant expansion and focus on such policies compared to the existing London Plan. It recognises and responds to the major challenges faced by venues, with policies setting out a positive strategy and framework to ensure enhanced consideration of the arts and culture within plan making and decisions across London during the plan period and hopefully beyond.

We acknowledge the Plan must be considered as a whole and that delivery of the 'Good Growth' principle, such as providing sufficient housing and employment to meet London's needs, is far broader than the Trust's remit and areas of expertise. However, on the basis of the proposed content concerning arts and culture we **support** the draft Plan.

Please find our responses to individual elements relevant to our remit below.

### **Detailed comments:**

#### Policy GG1 – Building strong and inclusive communities

Strong and inclusive communities is not just about the people within them and the design of the built environment, but also of the opportunities available to those people. The policy alludes to the broad nature of what strong and inclusive communities encompasses, for example ensuring good quality services and amenities and promoting the role of town centres as places for people to come together. The Trust considers that the role of the arts and culture in sustainable development and enriching people's lives through providing opportunities for participation and improving well-being ought to be given greater prominence within this policy. Given the strong support for the arts and culture within the Plan, and that culture can be a catalyst for regeneration and improve the strength and vibrancy of London's town centres, greater recognition of culture in this policy would underpin a consistent message running throughout the document. This is especially true with the identification of cultural facilities as a priority of good growth within Policy DF1.

#### Policy D9 – Basement development

This policy appears to be focused on residential development, although it is becoming increasing common for commercial and cultural uses including theatres to be located below

ground as part of redevelopment proposals. There are currently examples of this in the boroughs of Islington and Westminster. It would be beneficial therefore for the guidance notes on this policy to be expanded, to emphasise that where uses including theatres are proposed underground that the design is appropriate for the needs of the use, including ensuring appropriate internal layouts, sufficient visibility and access at street-level, get-ins and appropriate means of escape. Applicants proposing basement theatres would be encouraged to seek specialist advice from the Trust at an early stage.

## Policy D12 – Agent of change

The Trust welcomes this policy, and the positive impact it should have on the protection of cultural venues including theatres. This policy should also provide greater certainty where development is proposed in proximity to existing venues. We also recognise the explicit reference to theatres within supporting paragraph 3.12.4.

We would though highlight that it is important that this policy also recognises that noise and noise complaints directed at venues can also arise through ancillary activities to the venue's main purpose. In the case of theatres (but also music venues amongst others) this includes deliveries; for example, touring productions may have need to load/unload sets and equipment after performances in order to travel on to other locations. Placing restrictions on such activities can also detrimentally impact on viability.

## Policy S1 – Developing London's social infrastructure

The Trust supports this policy, in particular part G. which seeks alternative forms of social infrastructure to be considered before other types of uses. This type of policy is present within some boroughs but not all, so its inclusion within the Plan should ensure consistency in decision-making across London. The Trust would recommend that paragraph 5.1.1 is amended to include cultural facilities amongst the list of types of social infrastructure. While we acknowledge there is a separate policy for cultural uses later within the plan, we consider this policy to be complimentary to that rather than a duplication and that cultural uses do form part of London's social infrastructure due to their positive impact on people's wellbeing and the opportunities culture provides for social interaction.

## Policy E3 – Affordable workspace

Under part A.2. the Trust recommends the addition of performance studios as a further example of spaces with cultural value. It is important that small and start-up producers and groups also have access to affordable provision to help support the ongoing innovation and creativity of London's theatre and performance sector. This would also ensure some consistency throughout Chapter 6, as Policy E8 recognises the need for theatre (and film/television) studio capacity as a sector to be supported.

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### Policy E8 – Sector growth opportunities and clusters

The Trust welcomes recognition that provision of theatre studio capacity as part of London's overall provision of workspace should be supported. It may be beneficial to clarify within the policy, or within the supporting text, that within this context theatre studio relates to rehearsal/production space rather than performance venues which are covered by other policies. Without such space, opportunities for the development of new productions to ensure London has an ongoing vibrant and innovative theatrical offer and to nurture and develop new talent will be compromised.

### Policy HC5 – Supporting London's culture and creative industries

The Trust welcomes this policy. In particular, we support the identification of 'Cultural Quarters' and the recognition of the role arts and culture can play in local regeneration and town centre renewal. It is also important to note that cultural venues including theatres have a role to play in the overall growth of London, acting as anchors to improve the attractiveness of London's neighbourhoods as places to live thus improving well-being. They also have a key role to play in attracting visitors to the city; as noted in paragraph 7.5.2 cultural tourism supports 80,000 London jobs and contributes £3.2 billion of GVA to the city annually.

We understand the premise of part 4, but would issue some caution against a blanket support for temporary use of buildings and sites for arts and cultural use. In principle we support such use, which can have benefits including allowing the testing of concepts and facilitating the development of arts and cultural groups. However, it should be ensured that where such uses come forward they do not undermine existing venues. A revision of the policy to emphasise that temporary uses are complimentary to nearby established uses would be recommended.

### Policy HC6 – Supporting the night time economy

We support this policy but suggest that it is renamed 'Supporting the evening and night time economy' to better reflect the range of uses and times to which the policy applies, and for greater consistency with part B.6.

The direction within part B.6 for boroughs to support venues including theatres through development plans, strategies and development decisions is welcomed and something that will be an invaluable tool in ensuring that arts and culture will be treated as a greater priority.

### Policy DF1 – Delivery of the Plan and Planning Obligations

The recognition of the high priority to be placed on cultural and leisure facilities in delivering good growth is welcomed. This, and the emphasis on culture elsewhere in the Plan, should provide a robust framework to support inclusion of theatres and other cultural facilities within the Regulation 123 lists of boroughs.

### **Concluding comments:**

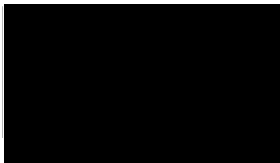
# Protecting theatres for **everyone**



Overall, the Trust believes that arts and culture should be more fully embedded and reflected in planning policy, decision making and planning outcomes throughout England. Within London, there is currently disparity between boroughs in terms of the strength of protection of cultural venues within Local Plans. We feel that the culture-related policies within this draft Plan will elevate the priority given to cultural policies at the plan making stage, and ensure greater consistency in decision-making which will benefit Londoners wherever they happen to live or work. They will also help to ensure the attractiveness of London as a place to visit and invest in.

The Trust has significant experience of matters related to theatres and other arts and cultural uses and would welcome the opportunity to provide assistance as this Plan or any further guidance is developed. We would also welcome further discussion on this representation. We otherwise look forward to being consulted on any further amendments to the draft Plan and will watch its progression towards adoption with interest.

Yours faithfully,



Tom Clarke  
National Planning Adviser

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