



## Arnika – Citizens Support Centre

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Prague, March 19<sup>th</sup>, 2019

Dear Ms. Katherine Turvey,

Dear Ms. Anna Sidorenko,

Dear members of the joint reactive monitoring mission,

we are very pleased that you will be visiting Prague, and we hope you'll get a deep and real image about the current situation in this city. Arnika, as a main expert NGO, which focuses on development of Prague and external examination of the preparation of new spatial plan of Prague (so called Metropolitan plan), is highly interested to meet you in person and follow common meeting of Arnika and members of joint reactive mission in 2008, to discuss current issues and risks, which appeared since that time. Unfortunately, so far we haven't received any official invitation to get such a possibility, although we believe, that Arnika is a relevant subject, which follows the development of Prague continuously, and therefore should get some space to introduce you to the situation from our point of view. We are afraid, that the fact that our organization was not invited to the official meeting with members of the mission, organized by the city, might be connected with our recent critique of the prepared Metropolitan plan. We believe, that opinion of you, renowned specialists with rich experience, and respected representatives of a world institution, is extremely valuable in current discussion and future decisions, which may be crucial for Prague's further development, cultural heritage protection, and also its environment. Therefore, in this letter we would like to introduce the key issues that we encounter in our work and which we identify as dangerous for the protection of monuments in the Czech capital, and we hope we still may get the chance to present them to you in person.

Prague is one of the most beautiful and most important historical cities in Europe. Its cultural heritage attracts over 10 million tourists annually and interest in Prague is growing. However, this unique city in the heart of Europe is threatened. In addition to transport problems and rising housing prices, the Czech capital has long been struggling with disorganized construction that threatens both the historical core of the city and its unique urban panoramas. In the long term, the Pankrác Plain area has been burdened by high-rise constructions; even though UNESCO recommended a maximum elevation of 70 metres, a building called the V Tower, which measures over a hundred metres high, was built. In the centre of Prague, an oversized project at Masaryk Station is planned, which, together with height intervention, will burden the centre with private motor traffic and completely neglects, for example, the fact that the site is the largest thermal island of the metropolis. The development of high-rise buildings in the centre and on its edges further exacerbate the situation regarding the protection of the historical core and its panoramas. Hand in hand with new building projects there are also trends in building regulations, which in general lead to significant

simplification of the rules on what it is possible to build, whether it concerns the protection of green areas, the functional division of the city, or just the height regulation, which is crucial part of the cultural heritage protection. The forthcoming recodification of the building law considerably weakens the protection of cultural heritage and monuments.

In 1992, the historical centre of Prague was listed as one of the World Heritage sites. Among the criteria that led UNESCO to include it was mentioned the fact that "Prague is an urban architectural ensemble of outstanding quality, both in terms of its individual monuments and its townscape, and one that is deservedly world-famous." The site also states: "Prague belongs to the group of historical cities that have preserved the structure of their development until the present times. Within the core of Prague, successive stages of growth and changes have respected the original grand-scale urban structure of the Early Middle Ages. This structure was largely enlarged with urban activities in the High Gothic period with more additions during the High Baroque period and in the 19th century. It has been saved from any large-scale urban renewal or massive demolitions and thus preserves its overall configuration, pattern and spatial composition." In particular, the authenticity and integrity of the territory were appreciated.

It is now threatened. In 2008, UNESCO set a maximum height for planned buildings in the form of a recommendation, which extends to the classical and greatly admired panorama of Prague. If this recommendation on the appropriate maximum height of buildings is not respected, it is possible that Prague and its panorama will actually lose its characteristic integrity and authenticity. In an extreme case, the continued construction of high-rise buildings could change the appearance of the panorama so much that Prague would lose the characteristics for which it was added to the World Heritage List in 1992 for similar reasons as in the recent case of Dresden, where the former inclusion of the city in the list was sacrificed to the construction of a new bridge over the River Elbe.

The planning of the capital has been facing problems in the long term. The currently valid and legally effective spatial plan came into force in the last century, and is far from addressing some of the major urban issues that have arisen with the coming of the new millennium. For example, the height limit of construction was omitted. At the moment, the work on the new spatial plan (what is called the Metropolitan Plan), which should have been done several years ago (its elaboration was commissioned in 2012), continues. However, the deadline for its elaboration was shifted (as a result of the insufficient quality of the versions that were submitted, major changes in the team of the Institute for Planning and Development, which creates the plan, and many other reasons). Currently, it should be made binding by 2022 at the latest, until which date the binding nature of the current spatial plan has been extended. Even on this date, however, not only because of past experience but also because of serious shortcomings in its content, doubts persist<sup>1</sup>. Last spring the lay and the expert public were given the chance to see the final version of its proposal, which underwent what were termed joint negotiations in June and July 2018. The draft of the new territorial plan was subjected to 50 thousand official comments from citizens, associations, owners of land, and institutions, many of them – among other things, by the municipalities and the state administration bodies involved – so fundamental that their incorporation into the current version of the document

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<sup>1</sup> <https://arnika.org/metropolitni-plan-se-bude-muset-prepracovat-postavila-se-proti-nemu-cela-praha>  
<https://arnika.org/kritika-metropolitniho-planu-je-zdrcujici-arnika-zada-odvolani-reditele-ipr-bohace-a-propusteni-architekta-kouckeho>

seems practically impossible. Prague is thus threatening to find itself in 2023 without a spatial plan and thus without effective regulation and protection of its monuments and cultural heritage.

According to the Institute for Planning and Development, the Metropolitan Plan is to be "an innovative document that comes with a change of paradigm in city planning. Instead of the current city planning based on the functional use of the area, it returns to the pre-socialist method of spatial planning." Its basic principle is to define the public space, the structure, and composition of the area and the landscape and to establish height regulations, which hitherto have been lacking. In the final document, however, it is determined in an inappropriate way, using a non-functional square grid, and completely ignores the previous UNESCO recommendation when it allows the construction of up to 27 storeys in some places in Prague<sup>2</sup>.

The text part of the Metropolitan Plan mentions ten principles of a new approach to the urban concept of the Czech metropolis. The second one concerns the historic city and the protection of its historical heritage: "The protection of the historical heritage is actively conceived as the development of a new layer of top architecture in the free areas in the peripheral parts of the monumentally protected areas and especially in the protected zone of the Prague Monument Reservation. The differentiation of regulations within the territory is the main principle of the protection and development of cultural heritage." The regulation of height is covered by the seventh principle: "The Metropolitan Plan sets out a complete stabilizing height regulation aimed at avoiding the occurrence of random and unjustified dominance. The composition of a higher building concentrates the city's energy and, at a reasonable distance from the centre, complements the historical composition without jeopardizing its values." The reality is somewhat different, however, and the current version of plan for Prague's monuments represents a significant threat.

The draft of the Prague Metropolitan Plan is conceived within the current trend of the simplification of construction regulations and poses a serious risk to the protection of Prague's cultural heritage, as confirmed, for example, by the Ministry of Culture's opinion on the Metropolitan Plan<sup>3</sup> or comments submitted by the National Heritage Institute<sup>4</sup>. The author of the Metropolitan Plan, Roman Koucký, also announced that being deleted from the UNESCO list would be a victory for Prague because it would bring a new influx of tourists who would be interested in the reasons for leaving Prague out of the list. In practice, however, it means that it would no longer be bound by the rules on the protection of its cultural heritage, so new constructions would be allowed<sup>5</sup>.

State regulation of construction is primarily determined by what is called the Building Act. In recent years, this has undergone a fundamental change characterized by liberalizing the rules for investors and excluding public opinion from building decisions. In 2018, an amendment to the Building Act

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<sup>2</sup> [https://zmenyprahy.cz/images/KLAVIR/NOVE%20PRIPOMINKY/Pripominky\\_vysky\\_jadra.pdf](https://zmenyprahy.cz/images/KLAVIR/NOVE%20PRIPOMINKY/Pripominky_vysky_jadra.pdf)

<sup>3</sup> <https://zmenyprahy.cz/novinky/stanovisko-ministerstva-kultury-metropolitni-plan-je-treba-od-zakladu-prepracovat-jinak-nebude-mozne-ho-dokoncit>

<sup>4</sup> <https://www.npu.cz/cs/pro-media/35864-odborna-informace-navrh-metropolitniho-planu-hl-m-prahy-vykazuje-vazne-nedostatky>

<sup>5</sup> [https://www.idnes.cz/praha/zpravy/architekt-roman-koucky-metropolitni-plan-praha.A180425\\_121229\\_praha-zpravy\\_nuc](https://www.idnes.cz/praha/zpravy/architekt-roman-koucky-metropolitni-plan-praha.A180425_121229_praha-zpravy_nuc)

excluded the public from the territorial and construction procedures<sup>6</sup> and the planned recodification would have even more fundamental consequences<sup>7</sup>.

In an open letter to the chairman of the Czech government, ICOMOS<sup>8</sup> (the Czech National Committee of the International Council on Monuments and Sites) also criticized the recodification. It expressed particular concern about the intention to recode the Building Act because of the fatal omission of the protection of the cultural heritage and the monuments from the plan. Like Arnika and the association of ecological organizations - the Green Circle, in a joint statement, draws attention to the fact that the private sector organized under the Chamber of Commerce was significantly involved in the preparation of the recodification. The building lobby has written the law according to its ideas and needs.

The submitted substantive intent of the recodification of the construction law completely ignores the whole area of the historic preservation and seeks to completely eliminate the principles of the protection of the public interest in preserving the values of the city's cultural heritage. The factual intention of recodification would prevent the independent activities of conservation authorities from safeguarding the public interest by abolishing the institute of binding statements and subjecting the authority of care for monuments and decision-making regarding this to the building office. This fundamental deficiency is publicly labeled as the benefit of the new law. The intention is to enable the construction of skyscrapers in historic city centres, the unmasked demolition of listed buildings, and a threat to the cultural heritage, including the environment.

Similarly, the Czech Chamber of Architects (ČKA), which is otherwise one of the main advocates of deregulation, also criticized the intention of the recodification. However, in its statement, the ČKA evaluates the intention very inadequately and incompletely. It completely neglects the fundamental risks it brings<sup>9</sup>.

In this spirit Prague (however, it is worth mentioning that it was the previous leadership of the city, namely Mayor Adriana Krnáčová) also violated the UNESCO requirements formulated at the 32nd session in Quebec in a serious way with regard to the position of the National Heritage Institute. The long-term goal of Prague is, according to these conclusions, to "strengthen the current" advisory role of the National Heritage Institute so that its views are given more authority and can help guide the main decisions affecting the integrity of the Historic Centre of Prague. The Mayor of Prague proposed in September last year that the National Heritage Institute should be excluded from decision making on monuments in the Prague Monument Reservation. The decision on the form of Prague would thus remain at the discretion of the officials from the city hall. Arnika, in its statement, attributed this to the criticism of the Metropolitan Plan which the Institute expressed, for which the Prague administration wanted to gain revenge<sup>10</sup>.

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<sup>6</sup> <https://arnika.org/rozhodneme-si-to-sami-rekli-poslanci-obcanu-se-nikdo-nepta>

<sup>7</sup> <https://arnika.org/novy-stavebni-zakon-z-pera-developeru-oklestuje-prava-obci-a-lidi>

<sup>8</sup> <http://www.icomos.cz/images/prohlaseni/2019/prohlaseni-cnkicomos-rekodifikace.pdf>

<sup>9</sup> <https://www.cka.cz/cs/pro-media/stanoviska-vyjadreni-cka/stanovisko-cka-k-vecnemu-zameru-rekodifikace-verejneho-stavebniho-prava>

<sup>10</sup> <https://arnika.org/primatorce-krnacove-nejde-o-rychlejsi-opravu-pamatek-cilem-je-potrestat-kritiky-metropolitniho-planu>

Regarding the specific spatial changes of the city, the territory of the Pankrác Plain is still the most active in terms of the height of constructions. It was selected for the construction of high-rise buildings by the socialist territorial planning of the previous regime. The pioneering act was the "Motokov" building, today "City Empiria", which is currently the third-tallest building in the Czech Republic. It was built between 1975 and 1977 as the seat of the national enterprise of the same name. The skyscraper has 27 above-ground floors and measures 104 metres in height, and has clearly had an impact on Prague's historical panorama. At the beginning of the 21st century, the building was reconstructed and is now being used for administrative purposes. Its capacity is not completely filled up, and unoccupied office space is still available for rent.

Another mammoth at Pankrác is currently the highest building in Prague; its construction started in 1983 and it was originally intended as the seat of Czechoslovak Radio. It was finished in 1993 and was never used for that original purpose. With the same number of floors as City Empiria, however, it reaches a height of 109 metres and is, therefore, the highest building in Prague. This building too still has free office space.

With the coming of the new millennium, the developers' interest in this area continued; according to the submitted projects, several other skyscrapers were supposed to be built on the Pankrác Plain. Among the unrealized proposals was a project of the American architect Richard Meier, who was planning to heighten the building of former Czech Radio and build another two towers with height up to 160 m next to it. The project was soon stopped as a result of public protests and after-effects of terrorist attacks on the World Trade Centre in New York, nevertheless, in 2005 a similar proposal appeared again. This time, the City Epoque Hotel and the 109-metre-high V-shaped "City Epoque Apartment House" were mentioned.

The realization of the second project, now known as "The V Tower", has followed a thorny path. The construction was halted both by the economic crisis and, in particular, the opposition of the local population, which led to the judicial annulment of a valid territorial decision. The city hall has been initially solving objections to the height in the appeal. Disagreement was expressed at the time by UNESCO, which recommended that the height of the building be reduced to 70 m, given the fact that Prague is – thanks to its panorama – listed as a World Cultural Heritage site. There was speculation that the building did not respect the historical significance and natural potential of the site. The planned construction of high-rise buildings in Pankrác caused disillusionment among conservationists. Many of them still believe that high-rise buildings in some parts of Prague can damage the town's panorama, and thus its historical value, which attracts tourism.

However, the municipality evaluated the site as not being part of a conservation area or monument zones, but rather a development area. In addition, at the time of mentioned discussions there were no further restrictions like regulation plan or determination of the maximum height of buildings. The municipality also decided that the intention would not be assessed under the Environmental Impact Assessment Act. It was precisely because of the lack of an environmental impact assessment (EIA) that the original construction had to be stopped because of a court decision.

However, the developer PSJ Invest, which is building a ten-storey-high office building near the V-Tower and promises to use sustainable development technologies, has found a way to implement the plan. Today's completed building started in 2015.

Currently planned for construction on the Pankrác Plain are three residential high-rise buildings with 22 floors, which could be part of the Kavčí Hory Residential Park development project. However, the EIA was discontinued in the autumn of 2017 at the initiative of the investor. Originally, the buildings were designed with a height of 72 m, but because of UNESCO's high-rise recommendation, the project was modified to 68 m. The current draft of the Metropolitan Plan, however, again envisages a higher permissible height for this area. The draft outlined a vague statement about the benefits of social amenities (a kindergarten was originally promised, but in the end, this idea turned into a mere option). A visualization of the potential impact of these buildings on the Pankrác skyline is attached in the annex to this letter.

The Pankrác skyscrapers severely disturb the unique panorama, which was one of the reasons for Prague being added to UNESCO's World Heritage List in 1992. While other high-rise buildings of steel, glass, and concrete were being built in other European capitals, Prague was dominated by the towers of St. Vitus' Cathedral at Prague Castle and Vyšehrad. Only Florence and Venice were spared in a similar way. The unique atmosphere of Prague and the human scale of its buildings are admired by hundreds of thousands of tourists each year.

The project to build high-rise buildings on the Pankrác Plain can ultimately jeopardize Prague's continued presence in the UNESCO list and act as a signal that the Czech Republic fails to take care of its cultural heritage and does not respect its international obligations.

The over-sized buildings on the Pankrác Plain also impose enormous demands on transport services. In the area, the legal limits on noise and air pollutant emissions are now exceeded as a result of excessive automotive traffic. This situation threatens the health of thousands of people. In addition, the potential need for thousands of parking spaces reserved for the users of the new buildings is also a question. The new parking area would increase traffic on the Pankrác Plain by 40-50 thousand car journeys daily. Such a traffic load would require the rebuilding of the road network. Partial changes have already taken place and car traffic is growing in this area. However, the rebuilding of the road network threatens the land designated for the eventual rehabilitation of the tram route, which could significantly improve the traffic situation.

Neither of the above-mentioned structures has solved the absence of much-needed residential facilities for the inhabitants of the Pankrác housing estates. There are no service facilities on the Pankrác Plain, and the local provision for leisure, sports, and culture is insufficient. The city district of Prague 4 is one of the largest Prague districts with its 138,000 inhabitants. Numerous proposals from investors and developers, however, have trivialized this need in the long term. Most of the developers' plans talk about creating more offices, a hotel, or a skyscraper with luxury apartments.

As far as other locations in the wider centre of Prague are concerned, the Central Business District and the reconstruction of the existing brownfield site near the Masaryk Station and the Florenc bus terminal are currently the ones that are the most talked about. The investor of this project is the Penta Group. It acquired land for construction from Czech Railways after long-term negotiations under controversial circumstances, and the conclusion of an agreement with the city over taking care of the greenery in the affected area took place in a similarly non-transparent manner. In 2017, Prague neglected the possibility of demanding a share of the cost of providing public spaces and



greenery from the investor and took over this obligation<sup>11</sup>. Such a move is all the more alarming in the context of the largest thermal island in the metropolis, which is created by the space around the Masaryk Station, which is intersected by the north-south highway, the busiest communication in the city.

The project, which currently underwent an environmental impact assessment and where the start of the territorial procedure is expected to begin in the near future, shows according to preservationists, as well as a number of municipal politicians and other experts, a serious risk for Prague's historic heritage. It should pursue the public interest in the centre of the metropolis (i.e. the most lucrative land in the city today), but it is intended for purely commercial use in the form of offices and shops. This was allowed by a change of the spatial plan, which cut the required minimum 40% share of housing. The physical form itself also raises significant controversy. According to the investor's information, the world-famous architect Zaha Hadid participated in the project, but the form of the project with respect to its historical surroundings faces criticism on the part of the professional public. The Vice-President of the Association for the Protection and Development of the Cultural Heritage of the Czech Republic (ASKORD), the architect Marie Švábová, considers the project to be a completely foreign and over-sized building that does not respect the plot of land, the roof landscape, and the scale for its volume<sup>12</sup>. According to ASKORD, the Penta project is at present the most serious threat to Prague in terms of its membership of the UNESCO List.

In the immediate neighbourhood, the Florentinum building, where the Penta Group is located, grew up. This large office building has aroused considerable controversy and shows the direction of present-day Prague – large administrative buildings that do not respect their surroundings, with only minimal emphasis on greenery or respect for the historical character of the city.

Another controversial construction project of recent years is the so-called Crystal in Žižkov. It was built in 2015. The fourteen-storey building is purely for office use and at first glance is fascinating because of its unconventional look, which gained it the nickname "the tooth" among the citizens of Prague. It even became the winner of the Arnika's "Glass Hell" award for the ugliest post-revolutionary construction, chosen by the Prague people themselves<sup>13</sup>. Because of its height, it is visible from most of Prague's sightseeing spots.

Nearby, there is the new project of the Central Park Žižkov towers, which is for residential use, in contrast to the previous two projects, but which illustrates very well the current concept of the construction of residential projects in Prague. These are mostly designed as lucrative residences for a more mobile clientele and thus only deepen the crisis situation concerning housing in the Czech capital, where the rises in housing prices have been the fastest in the European Union<sup>14</sup> in recent years. In the case of Central Park Žižkov there is a paradoxical situation as new dwellings are built, but because of their price and the manner of their implementation there is little interest in them and the project is therefore not profitable while leaving empty dwellings.

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<sup>11</sup> <https://arnika.org/praha-ustoupila-zajmum-penty-vzdala-se-tak-vlivu-na-podobu-masarykova-nadrazi>

<sup>12</sup> <https://plus.rozhlas.cz/praha-si-kvuli-masarykovu-nadrazi-koleduje-o-vyskrtnuti-z-unesco-navrh-zahy-7176512>

<sup>13</sup> <https://arnika.org/crystal-je-podle-prazanu-nejosklivejsi-porevolucni-stavbou-a-sklenenym-peklem>

<sup>14</sup> <https://arnika.org/krize-bydleni-se-prohlubuje-zatimco-zisky-developeru-rekordne-rostou-praha-po-nich-musi-pozadovat-vystavbu-dostupneho-bydleni-a-sama-zacit-stavet>

In the wider neighbourhood of the centre and in the centre of the city, so-called transformation areas designed for revitalization and development are defined in the forthcoming Metropolitan Plan. The revitalization of former industrial areas which are not currently in use is, of course, positive, but there is a plan that is ready to build buildings of up to 27 storeys in some places. The risk of high-rise construction in these areas therefore represents a problem for the future in particular.

Prague's construction and territorial development have long been pursuing a number of civic initiatives, but most of them focus on local problems rather than the development of Prague as a whole.

The finishing of Pankrác Plain construction has been followed since 1990 by the Pankrác Civic Initiative (SOIP), representing a part of the local population; Arnika, the Atelier for the Environment, and the Pankrác Company (Pankrácká společnost) joined later. The impetus for the establishment of the Pankrác Civic Initiative was the imminent construction of the giant Hotel Bristol, which was to occupy the entire territory of the Pankrác Pentagon. This project was prevented, but other negative development projects have come.

Lobbying developers do not stop; quite the opposite. Recently, reports have appeared in the press, which reports only on the basis of unilateral information provided by developers and investors, about the necessity of high-rise construction in Prague. This information often comes from the Association for Architecture and Development (SAR), a platform initiated by the largest residential developer called the Central Group. Last year it held meetings and conferences on high-rise construction in Prague, often attended by and under the auspices of the Mayor and the Ministry for Regional Development, i.e. key institutions in terms of building regulations. SAR also organizes a big event called "The summit of architecture and development"<sup>15</sup>, which invites politicians, leading officers, investors, architects, lawyers and other experts to participate, and takes place just during the joint reactive monitoring mission, which we don't consider as a coincidence.

A persistent problem is also the fact, that residents have limited opportunities to comment on proposed buildings. For a long time, the overall concept of the Pankrác Plain, its discussion with citizens, and an expert assessment of the effects of the construction on the environment were lacking. The concept was to set the maximum permissible height and size of new buildings, the maximum number of new parking places, etc. However, the management of the Prague 4 City District and the Prague City Hall prevented the setting of limits and the adoption of the concept. Instead of the conceptual steps of state authorities, investors and companies came up with random designs for buildings. This was reflected in the relatively uncoordinated and inconceptual development of this site.

In the case of strategic development documents – such as the Metropolitan Plan – last year, a certain breakthrough in terms of public participation happened, as the involvement of the public was getting bigger attention comparing to previous years. However, the reflection of the comments and suggestions of the public in the commented or discussed documents remains a problem; it often remains zero, as was the case in the current version of the draft Metropolitan Plan, on which the comments are now being considered.

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<sup>15</sup> <http://www.arch-rozvoj.cz/summit>



Arnika has long been the only civic organization that has been monitoring the development of Prague systematically as a whole, especially in the case of spatial planning. We believe that our caution and assessment of the situation, which we consider serious, will help give you an appropriate grasp of the current situation and help the Czech capital to preserve its existing unique historical cultural heritage.

Sincerely and with the expectations of meeting together

for Arnika – Citizens' Support Centre

A handwritten signature in black ink, appearing to read 'Václav Orcígr', written in a cursive style.

Mgr. Václav Orcígr