The Rt. Hon. Robert Jenrick MP
Secretary of State
Ministry of Housing, Communities and Local Government
2 Marsham Street
London
SW1P 4DF

9th February 2021

Dear Secretary of State,

Proposed new Permitted Development Right

As representatives from across the economy and society, we believe passionately that town centres must be planned by local authorities working alongside business and the community.

It is well-recognised by your department that the best town centres do not just happen but require active co-ordination at a local level. The NPPF policies support this approach, as do the objectives of the High Streets Task Force and the guidance for both the Towns Fund and the Future High Streets Fund. Blanket permitted development rights for E Use Class to residential would damage these objectives for relatively minimal returns on additional housing stock.

We welcome Government recognition that our town centres must change, but an all-embracing permitted development right that allows most commercial buildings to be converted to housing risks putting the long-term health of our town centres at risk for the sake of a short-term stimulus.

Putting ground floor housing in a random and uncontrolled manner within high streets does not draw footfall, does not support new businesses, reduces the potential for business growth and will undermine the viability of existing retail, cultural and commercial activities on the high street and remove convenience stores from local neighbourhoods. This will create a vicious circle whereby the reduced viability of the remaining commercial uses in turn threatens their existence and incentivises their conversion to residential.

At the neighbourhood level, we consider that local centres would be particularly at risk. The loss of local shops and services could precipitate their decline at a time when we are putting greater emphasis on the need for walkable neighbourhoods which provide a range of day-to-day needs in local centres. A change of use to housing is a one-way trip.

The policy puts the premises of small businesses at risk of redevelopment, will impact the real diversification of the high street and could threaten the existence of E Use classes uses such as financial and legal services, health centres, GP surgeries, Post Offices, community centres and hubs, gyms, leisure facilities, education, co-working spaces, and life sciences and deter other innovations coming into town centres.

Light industrial premises and the jobs and services they provide could be converted to residential, even though the locations could be far from the facilities and public transport residents need.

Financially, the proposed permitted development right reduces local authorities' ability to raise funds to mitigate the impact of conversions due to loss of planning gain, yet increases the pressure on local services, such as schools and other social infrastructure. In a relatively short time, it could also make a significant dent in local authority finances as council tax generally results in a lower contribution to local authority finances than business rates for the same size property.

You may be aware of concerns being raised about the lack of democratic oversight arising from the extensive use of permitted development rights. In the recent White Paper, you highlighted that the planning system has lost the public's trust. We are concerned that the extensive use of permitted development rights in the manner proposed without democratic oversight will lead to a further erosion of public trust and confidence in the planning system.

We therefore ask you to consider re-evaluating this policy. Instead, we believe more support should be given to local authorities to develop their own renewal plans, under clear direction in national policy. There is certainly the will and enthusiasm at a local level. What is often lacking is resource.

We all stand ready to support your aspirations for economic recovery, but we also all have an over-riding duty to our communities to build back better.

Yours faithfully,

Jonathan Harrison, Executive Director, ActSmart

James Lowman, Chief Executive, Association of Convenience Stores

Christopher Hall, Executive Director, Association of Cycle Traders

Ojay McDonald, Chief Executive, Association of Town and City Management

Bill Addy, Chair, The BID Foundation

Meryl Halls, Managing Director, Booksellers Association of the United Kingdom & Ireland

Christopher Turner, Chief Executive, British BIDs

Andrew Goodacre, Chief Executive, British Independent Retailers Association

Melanie Leech CBE, Chief Executive, British Property Federation

Jim Winship, Director, The British Sandwich & Food to Go Association

Karen Dear, Director of Operations, Craft Bakers Association

Crispin Truman, Chief Executive, CPRE the countryside charity

Kim Bayley, Chief Executive, Entertainment Retailers Association

John Farrand, Managing Director, Guild of Fine Food

Mark Walmsley, Chair, Independent Retailers Confederation

Simon Quin, Co-Chair, Institute of Place Management

Peter Eversden MBE, Chairman, London Forum of Amenity and Civic Societies

Corinne Stuart, Chief Executive, National Craft Butchers

Gary Wroe, Chair, National Association of Jewellers

Stuart Reddish, National President, National Federation of Independent Retailers

Joe Harrison, Chief Executive, NMTF

Mike Kiely, Chair, Planning Officers Society

Prof. Alan M Jones, President, Royal Institute of British Architects

Matthew Howell, Managing Director, UK & Ireland, RICS

Fiona Howie, Chief Executive, Town and Country Planning Association