

Clerk of the Levelling Up, Housing and Communities Committee
House of Commons
London
SW1A 0AA

15 May 2023

By email: CC Clive Betts MP

Dear John-Paul Flaherty,

I am writing to you in my capacity as Chair of the All-Party Parliamentary Group on Pubs, regarding the proposals for “High Street Rental Auctions” currently under consultation as part of the Levelling Up and Regeneration Bill.

The Pubs APPG welcomes any proposals that might see vacant pubs bought back into use, particularly given that the proposals recommend a focus on community uses when awarding leases. Community pub ownership is growing and seeing more urban pubs brought into community use, while supporting the high street as a whole, is a fantastic goal.

However, we would ask that the Committee consider the potential impact of the Permitted Development aspect of these proposals.

Unlike conversion of other property types, which tends to be more superficial, pub conversion often requires the removal of key interior features like a bar, cellar equipment, or a commercial kitchen. We note that there is no requirement for these features to be reinstated at the end of the lease period.

It is our view that at the end of the lease (when the proposed Permitted Development rights would end) venues where pub infrastructure had been removed would be highly at risk of being lost forever as the proposals give potential for conversion to be made permanent.

Loss of ancillary accommodation as a result of allowing sub-division of a premises would also make the return to pub use less likely, as the venue may be less financially viable or less attractive to a skilled licensee.

Recent changes to the planning system have purposely retained the distinction between pubs and the types of properties contained in Class E. To roll back the protection granted against conversion or demolition in 2017, and the creation of new planning use classes in 2020/21, by allowing interchange between these uses seems contrary to this legislation.

Further, many Local Planning Authorities have policies within their Local Plans which specifically guard against the unnecessary loss of valued community facilities like pubs.

We believe that pubs have huge value as social and community hubs, and that they add to the rejuvenation of high streets by both increasing and expanding footfall in the area.

However, we have serious concerns that these proposals are not in line with the approach taken to pubs – and their protection – in other areas of policy. The legislative framework surrounding pubs is complex, and it is vital to the trade that Government take a holistic approach to any changes in this area.



As such, I ask that you look urgently at the scope for permanent loss of high street pubs within the High Street Rental Auction proposals as currently written.

Yours sincerely,

A handwritten signature in black ink that reads "Charlotte Nichols". The signature is written in a cursive style with a long, sweeping underline.

Charlotte Nichols MP

All Party Parliamentary Group on Pubs Chair

