



**Andrew Boff AM**

**Chair of the Planning and Regeneration Committee**

Sadiq Khan  
Mayor of London  
(Sent by email)

16 March 2021

**Re: High streets**

Dear Sadiq,

I am writing to you in my position as Chair, on behalf of the London Assembly's cross-party Planning & Regeneration Committee with regard to your recovery plan for London's high streets and the risks posed by the proposed Class E permitted development rights (PDR).

The Committee has long been interested in the future of high streets. They are vital to the liveability of London's neighbourhoods, serve diverse communities and are essential for a thriving economy. Even before the pandemic, high street businesses were at a risk from stressors including a rise in online shopping and the costs involved with maintaining physical premises. Many retail shops and other high street facilities are simply not surviving, and the impacts of the pandemic are now compounding this decline. For example, the High Streets Taskforce found that, in England, high street footfall fell dramatically (89.86 per cent) during the first lockdown.<sup>1</sup> However, the pandemic has also highlighted the importance of high streets, with district and local high streets providing essential services during the pandemic. Whilst the situation is still in flux, it might be expected that these local areas continue to have increased importance if people continue spending more time closer to home in future.

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<sup>1</sup> High Streets Taskforce [2020 Footfall report](#)

On 3 March 2021, the Committee heard testimonies from expert guests:

- Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and Skills;
- Rob McNicol, London Plan Manager, GLA;
- Michael Bach, Chair, Planning and Transport Committee, London Forum of Amenity & Civic Societies;
- Ziona Strelitz, Founder Director, ZZA Responsive User Environments ;
- Nick Plumb, Policy Manager, Power to Change Trust; and
- Simon Quin, Co-Chair of the Institute of Place Management and Executive Director of the High Streets Task Force.

We were pleased to hear from Deputy Mayor Jules Pipe CBE about the GLA's adaptive strategies work and the high streets recovery mission, and the goal to deliver enhanced public spaces and exciting new uses for underused high street buildings in every borough by 2025. We agree that high streets are more than retail centres for Londoners; the social and wellbeing aspects are also critical. We will be interested to follow the progress on this mission, and what can be done in the short-term, specifically once London opens after this lockdown. High street businesses have been through an extraordinary period of uncertainty, and will be looking for support and advice to navigate the next steps toward recovering from the pandemic. The Economy Committee has also been exploring wider options for high street recovery; members suggest that your mission should be backed by a London High Streets Board which would allow for regular consultation to analyse short and long-term threats, as well as immediate remedies for high street survival. A diverse, representative board would be key in making sure that even small businesses can adapt.

The Deputy Mayor also elaborated on the work that the GLA is doing with boroughs and Business Improvement Districts (BIDs) to improve data collection on the current footfall on high streets across London, as part of your High Streets Data Partnership. We hope you will share the results of this project with Londoners in the coming months. In the meantime, we are writing to provide evidence from our investigation, which we believe could further build on the work of the recovery mission.

We heard from Simon Quin, Executive Director of the High Streets taskforce which was commissioned by the Government in 2019 and is based on Scotland's Town Partnerships - an agency set up by the Scottish Government. The idea of the of high streets task force is "*an alliance of place making experts working to redefine the high street*"<sup>2</sup>, which produces research and provides guidance on high streets and town centres. We heard in this committee meeting that the high-street task force has produced a 'transformation route map' which is a four-stage route map for strategic renewal. The stages are: Repositioning, Rebranding, Reinventing and Restructuring. The high-street task force also can provide experts for those local authorities with highstreets that have really been struggling. We were also told about the 25 top priorities<sup>3</sup> for vitality and viability in our high streets and town centres. These frameworks can help encourage healthy, vibrant and forward-looking high streets and town centres.

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<sup>2</sup> High Street Task Force [Who are the Task Force](#)

<sup>3</sup> High Street Task Force [High Streets Task Force Frameworks](#)

Coming up with innovative and original ways to improve the high-street experience might be key to saving it. Nick Plumb told us about the value of community-led initiatives, including community businesses. Nick highlighted Peckham Vision as an example; a residents-led citizens' association of individuals who live, work and run businesses in Peckham, which exists "to develop an integrated approach to Peckham town centre".<sup>4</sup> This provides local stakeholders the opportunity to steer strategic decision making for their local centres and might prove a unique and positive example in a post-pandemic situation and for your recovery mission. As well as this, they act as a high street destination, encouraging increased footfall. Nick also mentioned the Fonthill Road development in Finsbury: *"in part led by the local Council, which has leases on a number of shopfronts, which it then lets to providers that have a community angle to them, which in turn provide affordable workspaces for local micro-enterprises."*

We also discussed Community Improvement Districts (CID), *"a new form of local governance to provide opportunities for community stakeholders to participate in operational and strategic decision-making for their neighbourhoods"*.<sup>5</sup> These should be *"non-political, democratic and inclusive, concerned with the economic, social and environmental development of neighbourhoods, open to residents, businesses and other local stakeholders, including the local authority; and designed to complement other mechanisms"* such as Businesses Improvement Districts.<sup>6</sup> Nick told us about legislation in Scotland enabling greater community involvement in high streets, such as the Community Empowerment Act which promotes greater community involvement at the local level. Landlords also play a crucial role by agreeing progressive leasing models that encourage community involvement.

Nick stated that community businesses are less common in London than the rest of the country, with one of the barriers being transparency of ownership on the high street. A community business might have a great idea, but they need to know who to contact to make their ideas a reality. The Committee encourages you to look into how you can assist in reducing barriers for community-led initiatives.

Another promising idea is the introduction of more localised, community-owned workspace and 'third place working'. During the first lockdown over half of Londoners (57.2 per cent) did some form of work from home, and after a limited return to offices over the summer, by January 2021, 45 per cent of adults were working from home again across the country.<sup>7</sup> We heard from Ziona Strelitz that even before the pandemic, many people wanted to work away from their employers but not in their homes.<sup>8</sup> Nick Plumb further highlighted the role of community business in this idea:

*"Many community businesses already host shared workspace. Many of them in the past will have had meeting rooms and more permanent office space that they leased to other small*

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<sup>4</sup> Transcript 3 March 2021

<sup>5</sup> Nick Plumb, Transcript 3 March 2021

<sup>6</sup> Ibid

<sup>7</sup> [UK sees surge in empty shops and offices amid pandemic – RICS](#), Reuters, 28 January 2021 Reuters, 28 January 2021

<sup>8</sup> Transcript 3 March 2021

*businesses to act as real community hubs. Some of the community businesses we have spoken to have talked about how they can maybe repurpose some of that space to shared workspace in the local place, which, again, could be supported by the GLA's Workspace Accreditation Scheme to ensure that the shared workspace we do have really has that community-led angle to it."*

Finally, there was some consensus that innovative mixed-uses can provide and offer "social multiplier effects".<sup>9</sup> Ziona presented an example that even if we enter a Student Union for one reason, we may be presented with other things that allow us to stay in that place a little longer. "There is now increasing evidence from the world of neuroscience about how being able to dip into micro contexts, even for a limited exposure, is so important to people's wellbeing".<sup>10</sup>

We encourage you to take some of these ideas forward in the work you are doing under your recovery mission. We are pleased to see that concepts of community interest and innovation, as well as near-to-home working, already feature in the opportunities for this mission.<sup>11</sup> The Committee will watch with interest over the coming months, as London emerges from the pandemic and your recovery mission is put into action, to see how these principles operate in practice.

#### **Recommendations**

1. Now that the country's reopening roadmap has been announced, the Mayor should convene a roundtable to meet with representatives working on innovative approaches to the high streets.
2. The Mayor should put community-led innovation at the heart of the high streets recovery mission. As well as actively supporting community-led initiatives, resource should also be directed to identifying and working to reduce any barriers.

#### **Permitted Development Rights (PDR)**

You will be aware of the Committee's long-standing concerns that various expansions of PDR are bypassing the planning system and that conversions to residential uses without planning oversight risk undermining the recovery of high streets. Whilst we recognise the need for new homes and flexibility in planning, we know you will share our concern that the newly proposed Class E PDR will negatively affect the economy of local high streets and neighbourhood centres. We expressed our concerns in our response to the consultation on the proposed Class E PDR.<sup>12</sup> We are also in the process of submitting a response to the new consultation which worryingly seeks to reduce the operation of Article 4 directions, which currently provide local authorities with an option for limiting existing PDRs.<sup>13</sup>

We were encouraged to hear from guests at our Committee meeting that there was a great deal of consensus amongst participants about the unintended consequences of PDR, and shared concerns

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<sup>9</sup> Ziona Strelitz, Transcript 3 March 2021

<sup>10</sup> Transcript 3 March 2021

<sup>11</sup> London.gov.uk [High Streets recovery](#)

<sup>12</sup> [Planning & Regeneration Committee](#), 28 January 2021

<sup>13</sup> [National Planning Policy Framework and National Model Design Code: consultation proposals](#), 8 February 2021

about the impact expansions of PDR would have on post-pandemic recovery of the high street. Michael Bach clearly articulated many of the Committee's concerns:

*"[Local centres] are extremely vulnerable to change of use because the ground-floor shops could easily be turned into flats... It is going to undermine our concerns about local communities and whether neighbourhoods will have the facilities they need in the future. A successful PDR policy could spell the death of those local centres."*

*"The one thing you have to remember is that a move to housing is a one-way trip. Once you have stripped it out, you have reduced the attraction of that centre. Having odd housing units - pepper-potting, if you like - reduces the attractiveness, the vitality, the footfall and the expenditure. It does not, as the Government claims, support those town centres. Yes, there will be places that you can lose shops but it ought to be done in a more controlled way rather than a blanket across-the-board relaxation."*

We welcome the efforts you have made to raise your concerns and we urge you to continue to advocate to the Government not to adopt the newly proposed Class E PDR and the amendments to Article 4 directions.

#### **Recommendation**

3. The Committee reiterates the concerns it has laid out previously in the response to the consultation on the proposed Class E PDR, specifically those that would impact on the economy of the high street. The Mayor should continue to strongly advocate to Government not to adopt the newly proposed Class E PDR and the amendments to Article 4 directions.

The Committee would welcome a response to this letter by 30 June 2021. Please address your response to Stephanie Griffiths, Senior Policy Adviser, at [Stephanie.Griffiths@london.gov.uk](mailto:Stephanie.Griffiths@london.gov.uk).

Yours sincerely,



**Andrew Boff AM**  
**Chair of the Planning and Regeneration Committee**