



Housing, Communities and Local  
Government Committee  
House of Commons,  
London,  
SW1A 0AA

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14 September 2020

Dear Sir

**Commons Select Committee Inquiry into Supporting our high streets after Covid-19**

The Institute of Historic Building Conservation is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

We are very pleased to have the chance to offer comments to the Inquiry. IHBC welcomes this Commons select committee inquiry looking at the long term consequences of the Covid-19 outbreak for businesses and amenities on the future of the high street. We also welcome governments desire to mitigate the economic and social impact and develop policies to ensure high streets remain the centre of local communities.

Culture is a driver of economic development. Heritage-led economic development and regeneration has transformed many town centres and high streets, peripheral commercial and industrial areas over the past couple of decades. There are many good case studies<sup>1</sup>. Many city and town centres and high streets have designated

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<sup>1</sup> <https://www.heritagefund.org.uk/publications/townscape-heritage-initiative-evaluation>

[https://www.academia.edu/8935071/TOWNSCAPE\\_HERITAGE\\_INITIATIVE\\_SCHEMES\\_EVALUATION\\_Ten\\_Year\\_Review\\_Report](https://www.academia.edu/8935071/TOWNSCAPE_HERITAGE_INITIATIVE_SCHEMES_EVALUATION_Ten_Year_Review_Report)

historic environments. This can make them more attractive and can give them a competitive advantage. It is important to build on this, but care should be taken to ensure that any incentives will allow for variation in local circumstances to be taken into account rather than imposing requirements which may not apply to all circumstances

The Housing, Communities and Local Government Committee report on High streets and town centres in 2030 highlighted the challenges facing high streets and town centres due to strong competition from online competitors, an unfair taxation regime and the fragmented ownership of commercial properties. On the first two points, we believe there is a growing need to change the basis of local authority funding away from business rates, which unfairly penalise the businesses still operating in town centres whereas on line businesses pay very little tax. Continuing to base council taxes on property, and to further penalise empty or part-empty properties that are symptoms of changes in retail and dining habits, accelerated by Covid-19, will devastate High Streets and city centres. Fragmented ownership can be positive in helping promote diversity and mixed uses rather than monolithic malls. Factoring can achieve common repairs for housing and the shops below, something being developed by the Scottish Parliamentary Working group in collaboration with BEFS and RICS<sup>2</sup>

A renewed focus on heritage-led regeneration in historic areas will help high streets. Funding area grant schemes would support investment, improve the appearance of buildings especially shopfronts and make upper floors more viable. Such interventions are sustainable and have long term benefits for relatively small investment.

This successful approach to town centres taken in heritage-led regeneration over recent years could also be applied as a methodology to the improvement of local areas where the heritage is less well acknowledged. Grant schemes such as recently announced Town Centre Funds<sup>3</sup> need to be focused on long term sustainable value for money outcomes not on hasty thought out spending of funds. Many economic improvement and regeneration schemes carried out in town centres and high streets without expert design advice and not concentrating on the historic structure result in schemes not of sufficient quality, with poor quality improvements, or focused enough, without specific focus on areas or groups of buildings. Lessons for all high streets regeneration can be learnt from successful heritage-led regeneration schemes. IHBC members have experience in working on grant schemes and delivering a lively mixed use economy within a high quality environment.

Government, local councils and other stakeholders will need to provide support for small and independent businesses on short and longer term business planning, marketing, digital presence, etc. Much supporting research has been carried out

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<http://ihbconline.co.uk/context/138/14/#zoom=z>

<http://ihbconline.co.uk/context/138/18/#zoom=z>

<http://ihbconline.co.uk/context/102/#19/z>

<sup>2</sup> <https://www.rics.org/globalassets/rics-website/media/news/working-group-on-maintenance-of-tenement-scheme-property---final-recommendations-report.pdf>

<sup>3</sup> <https://www.gov.scot/policies/regeneration/town-centre-fund/>

by bodies such as Historic England which evidences that historic areas support higher proportions of independent businesses.

Covid 19 and its aftermath brings changes to the uses of building on the high street. Offices may be no longer needed with changing work patterns, the expansion of digital media for meetings connectivity and home working. This is likely to result in change of use to residential use.

IHBC urge caution concerning changes to residential use. Repopulating historic town and city centres is desirable but caution must be exercised to ensure that the possible changes of use from commercial to residential are not associated with poor quality conversions to housing that is sub-standard (an unintentional side effect of the permitted development rights where supervision is not exercised). In many cases repopulating of town and city centres, adapting existing premises to do so, works well, with appropriate planning oversight.

Many homeworkers may cut long commuting times and take workspace locally. There may be potential for vacant shops in high streets to be converted to hubs for local homeworkers. Parking would not be needed as people would walk there from their homes nearby. Limited facilities would be needed, as it would suit people who just need a desk, IT and storage, and so the level of adaptation might be easily achievable without large costs. Any increase in activity from occupation of high street buildings would have an economic spin off also. This is also a use more likely to be part of an active high street.

An increase in residential population around high streets will support continuing retail uses in a move away from destination shopping. Many historic towns have traditionally had a town centre population but there are many town centres with fewer people now living in them. More housing may be needed in town centres. New housing should always be sensitive infill which is well designed, of quality construction and most importantly to scale and in context. The location of new housing should be carefully considered to ensure it does not destroy the cohesion of the high street retail area, leading to further decline as shopping areas get cut off from each other and stop footfall. The quality of existing town centre housing should also be improved, much of it, especially bedsits over and behind retail properties, can be cramped and sub-standard. Through Living over the Shop initiatives<sup>4</sup> it is possible to ensure good quality homes are created.

We have concerns that socially valuable uses may be replaced by more profitable housing. We believe this would work contrary to the need for sustainable development and would undermine the vitality of town centres. This applies particularly in historic towns where businesses and cultural activities find it hard to compete or are driven out by high return residential conversions.

The zoning system currently proposed in the Planning White Paper for England identifies conservation areas, which includes many town centres, as areas to 'Protect'. Zoning conservation areas as 'protect' fails to recognise that many are in city and town centres or other areas in transition or that heritage delivers sustainable growth. The survival of many conservation areas depends on

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<sup>4</sup> <http://ihbconline.co.uk/context/127/index.html#18>

attracting investment and maintaining levels of economic activity, especially in the current economic climate. The proposed zoning system will undermine sustainable growth strategies and would be a retrograde step.

Planning policies and Government funding programmes are focused on high growth areas with affordability problems, rather than areas with viability challenges. This can affect high streets in many areas. This needs to be reversed, so that the areas with the most serious viability problems are prioritised.

IHBC also encourage Government to consider reducing VAT on the repair of buildings especially historic and Listed Buildings. The current imposition of VAT on repairs works in favour of new build and greenfield development. Removal of VAT on repairs would encourage the repair and reuse of town centre buildings.

Town centres still need to encourage people from outside to visit for shopping, and personal and social activities. Out of town or edge of town shopping needs careful planning for proposals near to struggling High streets. The mismatch of free parking outside towns and costly parking in towns may also prevent the use of town centres. A strategic removal or reduction of parking fees in town centres, especially small towns, and a focus on maintaining better affordable public transport, will help sustain and support the use of town centres.

Yours sincerely  
Fiona Newton  
IHBC Operations Director