

Response to the Ministry for
Housing, Communities and Local
Government consultation on
'Proposed reforms to the National
Planning Policy Framework and
other changes to the planning
system'

CAMRA



Consultation response

Introduction

Thank you for the opportunity to respond to this consultation. CAMRA is a volunteer-led, not-for-profit organisation that has been campaigning for pubs, pints and people since 1971.

We are the voice of beer drinkers and pubgoers in the UK, with over 140,000 members, and have been at the forefront of campaigns to shape the planning system to support the retention of viable pubs, which are vital community assets.

We take an interest in planning matters as we wish to see pubs protected and promoted as community hubs and as vital parts of local economies, contributing to the Government's growth mission.

Our volunteers across England have spent thousands of hours campaigning to save pubs through the planning system. They have extensive, on the ground experience of commenting on planning applications, taking part in Local Plan formation, listing pubs as ACVs, supporting community ownership bids, and campaigning for changes to England-wide legislation to prevent the loss of viable pubs.

In line with our specific organisational focus, our response focuses on specific aspects of the proposed Framework.

While we strongly support some aspects of the new Framework, we also have serious concerns that policy HC6, as currently drafted, will result in local authorities being bound to allow applications for conversion of otherwise viable pubs, and could result in strong pub protection policies being removed from Local Plans.

This is easily remedied, and we look forward to continuing to engage with the Department to find a solution.

The case for consistent action from government to support pubs

Pubs as community assets

Pubs are vital community facilities, as recognised by government for well over a decade.

As well as providing a 'third space' for communities, they are important for combatting loneliness and social isolation, raise hundreds of thousands of pounds for charity annually and are increasingly diversifying to provide more community services including shops and post offices.

Pubs as economic drivers

Pubs are also vital to the UK economy. The pub and brewing industries across England support around 914,000 jobs¹ and add £29.8 billion to the economy in England alone each year².

¹ BBPA Statistical Handbook 2025, BBPA data and National Statistics (2022)

² BBPA Statistical Handbook 2025, Oxford Economics (2022)

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Alignment with wider Government policy and priorities

The UK Government has a long-standing record of supporting pubs as community facilities, and for their role in our economy.

In more recent years, this has included:

- Pubs are part of the UK Loneliness Strategy, introduced in 2016³.
- In 2017, the Government introduced changes to planning laws in England to always require planning permission, and therefore consultation, before a pub could be converted or demolished. Those changes were the result of a cross-party campaign and give pubs in England the most robust planning safeguards of any UK nation.
- Various business rate reliefs, including the support package announced in January, in recognition of “the challenges they face and important role they play in local communities”.⁴

Responses to specific consultation questions

Q31: Do you agree with the new intentional unauthorised development policy in policy DM8?

Strongly agree.

Please provide your reasons, particularly if you disagree

We strongly agree with the proposed revision that would mean that intentional unauthorised development should be considered when deciding whether to grant or refuse planning permission.

This would be helpful in instances where a pub has been intentionally demolished or converted without permission.

Since 2017, change of use or demolition of pubs in England has required planning permission, meaning that the local community will always have a chance to object or comment on plans. This change has seen a decline in the number of pubs being lost as communities use this opportunity to protect their locals.

However, CAMRA has also seen a spike in unlawful conversions and demolitions in this time.

In our view it is now clear that the Government needs to give local authorities a range of stronger enforcement options to deter developers from flouting planning rules, acting swiftly and robustly where they do.

CAMRA would like to see the following planning policy and enforcement changes from the Government:

- Unauthorised pub demolition to be made illegal, not just unlawful, therefore creating a specific offence and increasing the penalties available to developers who flout the law.

³ [A connected society: a strategy for tackling loneliness - GOV.UK](#)

⁴ [Government announces support package that backs British pubs - GOV.UK](#)

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- A statutory, rather than discretionary, duty on Local Planning Authorities to investigate and remedy breaches of planning law.
- New legislation that allows Local Planning Authorities to compel the complete restoration of unlawfully demolished pubs through a 'brick by brick' rebuilding order.
- A statutory requirement for Local Planning Authorities to produce Local Enforcement Plans, to set out clear deterrents for developers to break planning rules.

A list of cases where enforcement has not happened or has not been effective, demonstrating the need for change, is included in Annex 1, below.

Q33: Do you agree with the new Article 4 direction policy in policy DM10?

Strongly agree.

Please provide your reasons, particularly if you disagree.

We believe that Article 4 directions can be a useful tool available to local authorities if protections for all pubs were to be removed or weakened.

Whilst we would prefer for existing policies to be retained (as referenced in answer to Q162), giving local authorities more flexibility to use Article 4 directions to remove any new permitted development rights affecting pubs would allow councils to better protect public houses from unwanted conversion to other uses.

Q40: Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?

Neither agree nor disagree.

Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics.

CAMRA would want to see pubs excluded from any permitted development rights that apply to land surrounding stations. We believe that every pub deserves a level of protection from conversion into housing or other uses and that the need for planning permission should be retained in all circumstances so that local people can have their say on the future of a pub as a community facility.

In recent years, there has been an increase in pubs opening near (or on the platforms of) stations, proving them to be of complementary use to travel infrastructure.

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Q89: Do you agree with the approach to development in town centres in policy TC2?

Neither agree nor disagree.

If not, please explain how you would achieve this aim differently?

CAMRA does not support relaxations in the planning rules relating to pubs in town centres. We believe that all public houses, including those in town and city centres, deserve protection from demolition or change of use without planning permission.

As well as being key to increasing footfall and having a positive impact on shops, services and the local economy in town centres across the country, pubs are a vital part of our social fabric.

Public houses have a significant positive impact on their community. Pubs in town centres and urban settings are just as vital to their communities as rural pubs and in many cases just as at risk.

Q160: Do you agree that the proposed policies at HC3 and HC4 will support the provision of community facilities and public service infrastructure serving new development?

Strongly agree

Please provide your reasons, particularly if you disagree.

CAMRA supports greater emphasis being given to community facilities, including public houses.

We would like to see all major housing developments being constructed with accompanying community facilities, including at least one pub.

We would like to see planning policy require all new large-scale developments to contain at least one pub.

This could be achieved by strengthening the National Planning Policy Framework (Section 8) by adding an additional paragraph that explicitly requires local authorities to ensure the provision of appropriate community facilities, including pubs, in all major new housing developments.

The London Plan policy HC7 offers protections for public houses and supports their inclusion in new developments. This should be replicated in the National Planning Policy Framework.

Q162: Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6?

Strongly disagree.

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Please provide your reasons, particularly if you disagree.

CAMRA and our members strongly disagree with the proposed changes to policy HC6.

As proposed, we do not believe that this would provide additional protections for the last pub in an area. Instead, we fear that it would lead to existing protections for all pubs being weakened and only applying to the last pub in an area.

Developers often want to convert pubs into more profitable uses like houses, shops or takeaways. Removing the protection in the planning system for the vast majority of pubs in England would make it easier for developers to convert a pub into another use without local people being able to stop it through the planning permission process, even if they are viable businesses and are valued by their local community.

This is because councils would have to take note of this revised policy and so would find it harder to refuse planning permission for conversion of an otherwise viable pub unless it is the last one in the area.

We were delighted to work with Lord Kennedy of Southwark and other Labour colleagues to secure better protections for pubs in the planning system in 2017 by ensuring planning permission is required to convert a pub. These changes have undoubtedly made it much more difficult for developers and others to obtain planning permission to change the use of, or demolish, viable and valued pubs which have thereby been saved for their communities.

We believe that this strong and effective policy should be retained and strengthened where appropriate through better enforcement actions and powers for local planning authorities.

CAMRA has never supported a position that would prevent *any and all* pubs from being converted or demolished, but such losses should be restricted to pubs where evidence shows that they are not valued by local people and where the loss would not have a detrimental impact on community life.

We know that communities value pubs as a vital part of our social fabric, and that the Government recognises this through the introduction of the 'Community Right to Buy' policy.

Weakening protections in the planning system for pubs (as HC6 as currently drafted will do) seems to be at odds with this policy as it will make it easier for developers to convert a pub for another use unless it is the last pub in the area. For example, many villages have two pubs, one that focuses on food and draws customers from a wide area primarily to eat and a community pub where local people gather to meet and socialise in a welcoming, convivial atmosphere. If the latter were to be lost, the former would not be an adequate alternative. Community cohesion and collective wellbeing would both suffer.

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There are lots of different types of pubs fulfilling different community needs. Competition and complementarity are vital. If communities wish to save their local pub from conversion or demolition, or want to take it over as a community-owned business, then they should have the tools they need to save it – even if there is another pub in the area.

We are not aware of any Local Plans which have policies that only relate to the last pub in an area.

We strongly urge the Government to revise the proposed changes to policy HC6 to guarantee that all pubs are afforded the protections that they deserve in the planning system.

Additional policy consideration

CAMRA would also like to raise the following proposal to strengthen the planning system as it relates to pubs.

Definition of a pub for planning purposes

The lack of a clear definition of a pub for planning purposes is leading to a lack of consistency when it comes to the approaches that local authorities are taking when it comes to issues of pub protection.

A recent decision by Whitbread to close 115 pubs next to their hotels is a case in point (see Annex below).

CAMRA has made representations to many local planning authorities that Whitbread should have to apply for change of use planning permission as these venues are pubs that have separate areas just for food and where customers can order just a drink without the requirement to have a meal.

Some authorities have agreed, others taking the view that enforcement action would not be in the public interest.

We would like to see:

- The introduction of a legal definition of a public house for planning purposes. Some examples of problematic cases where a definition of a public house for planning purposes would have been useful are included below in Annex 1.
- The Government's definition of a public house for use by local authorities for assessing whether non-domestic rates relief should be applied from April 2026 would be a useful place to start in terms of a definition.
- Changes to the wording of the relevant use classes to provide clarity.

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Contact

We are happy for our response to be published, and to be contacted about the contents of our response.

If there is anything with which we can assist you, please do not hesitate to contact us on campaigns@camra.org.uk

Annex: Enforcement problems – examples:

1. Various Whitbread-owned pubs

In July 2024, Whitbread closed to the public 115 pubs adjacent to Premier Inns. Their declared intention is to incorporate these pubs into the hotels, developing the space into extra rooms, resident-only dining areas or both. In 25 cases, they applied for a certificate of lawful development to class these pubs as restaurants on the basis that they had operated as such for more than ten years.

CAMRA objected to all these applications where it could (three Councils refused to accept representations) but so far, all those decided have been approved. No other planning permissions have been sought. CAMRA has lodged 29 complaints with enforcement services that these changes represent an unauthorised change of use from pub to hotel use.

At all these premises, customers could visit just for a drink and there was no requirement to buy a meal – hence our argument that they are/were pubs, not restaurants. At the time of writing, no Council had accepted that a breach of planning control had taken place and that action on their part was in the public interest.

2. Vine, Pitshill, Stoke (City of Stoke-on-Trent)

Elderly owners retired in August 2020 but continued to live at the pub. Reported to the local Council in June 2021 along with suggestions as to how the situation could be resolved. No response other than a couple of emails apologising for lack of action due to 'major deficiency of resources'. Thankfully, it reopened in 2025 under new owners and recently won the Heritage category of our Pub Saving Awards.

3. Half Moon Inn, Sharow, Ripon (North Yorkshire)

Residential use of the closed pub began in July 2019. An enforcement officer visited in 2020 and reported that pub use had not ceased as residential occupation was confined to upstairs. Enforcement notice was eventually served March 2023. The owner has applied for a Certificate of Lawful Development which is currently being considered – delays in taking action may mean Council has no choice but to issue.

4. Crown and Cushion, Great Gransden (Huntingdonshire)

The Council has consistently refused to accept that there has been an unauthorised material change of use and to issue an enforcement notice despite the pub having

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closed in 2019 and been lived in since – this despite campaigners obtaining a legal opinion from a leading planning barrister.

5. Tunnel Top, Dutton (Halton)

The pub closed in 2017. High fences were erected round the site in 2020 without permission; when contacted, the Council said consent was not needed for fences up to 2m high (the fences are much higher than that). In July 2021 CAMRA complained about the unauthorised residential use given the four-year rule: the Council said that it didn't apply here. CAMRA again complained on grounds that this simply wasn't true – no response has been received. Further missives have also elicited no response. Planning application for change of use is currently under consideration.

6. Slaters Bar, Stafford (Stafford)

The micropub was converted to a vape shop without planning permission in December 2023. This has been reported to enforcement but we have received no response yet.

7. Lord Nelson, Stafford (Stafford)

The pub closed in 2015, and a change of use application was submitted in 2021 but not yet determined. Use as an office and store has already begun. This has been reported to enforcement February 2024, but we have received no response.

8. Parkinsons Arms, Scunthorpe and White Hart Inn, Brigg (both North Lincolnshire)

Unauthorised changes of use was reported in April 2024 but no response beyond automatic acknowledgement.

9. Dumbles, Westhorpe (Newark and Sherwood)

The pub closed and was bought by developer. It is now used as student accommodation. The Council has simply refused to act.

10. Ship, Croydon (Croydon)

More than one application for conversion to flats has been refused but the developer went ahead and converted the anyway. The Council was asked to take action but instead granted retrospective permission.

11. Olde Clocktower, Croydon (Croydon)

The pub was demolished without planning permission in late 2021. A complaint was made to the Council, but no action has been taken.

12. Indian Brewery, Solihull (Solihull)

Clear evidence of unauthorised change of use to restaurant. No response from enforcement.

13. Bluebell, Henley-in-Arden (Stratford-on-Avon)

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Customers just wanting a drink are now told can only have one with a meal. A direct enquiry brought the response 'We are a restaurant only, so yes, a drink with a meal'. Enforcement has been informed – no response so far.

14. Valiant Trooper, Aldbury (Dacorum)

Various planning applications for alterations and changes of use refused but owner has gone ahead anyway. Council strangely reluctant to take enforcement action.

15. Black Dog, Canterbury (Canterbury)

The micropub closed in 2020 and re-opened as a retail gallery. Reported to enforcement but no action taken; repeated complaints ignored.

16. Royal Oak, Canterbury (Canterbury)

This traditional old pub closed January 24 and was converted to tearoom. Reported as unauthorised change of use but no action despite reminders.

17. Mill, Canterbury (Canterbury)

The pub was sold in 2022 and converted to convenience store without planning permission. No action was taken by enforcement.