



Campaign for Real Ale
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**CAMPAIGN
FOR
REAL ALE**

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PPW Chapter 10 and TAN4 Consultation Planning Policy Branch
Planning Directorate
Welsh Government
Cathays Park
Cardiff CF10 3NQ

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Proposed changes to Planning Policy Wales, Retail Centre Development – CAMRA Response

I am responding on behalf of the Campaign for Real Ale (CAMRA), a consumer group with over 175,000 members that acts as the independent voice of real ale drinkers and pub goers. Our vision is to have quality real ale and thriving pubs in every community.

CAMRA has over 4,500 members in Wales and is very concerned that two pubs close every single week across the country. Pubs are the heart of our communities; providing a place to enjoy a pint in a safe environment, raise money for local charities, and host events that bring the whole community together. As outlined in the consultation, pubs are intricate to town centres, offering diversity, creating hubs for social and business activity and increasing the amount of time spent in the centre. Furthermore, they support growth and investment in the area, injecting around £80,000 a year into the local economy and providing additional employment opportunities.

CAMRA has welcomed the Government's consultation to update PPW Chapter 10 and TAN4 to promote the Welsh Government's objectives to enhance the vitality, attractiveness and viability of established town centres. Given the crucial role that pubs play in supporting social activities, community interaction and enhancing the quality of life for Welsh residents, we firmly believe that public houses need to be taken into consideration within this consultation and be protected within the Welsh planning system.

Changes of Use and development management

As expressed throughout section 10 of the consultation, CAMRA supports a change in the planning system to ensure valued community assets are protected.

CAMRA believes that the current Use Class system fails to provide sufficient protection to valued community pubs. Under the current Use Class system, pubs can be demolished or converted to A1, A2 and other A3 uses without planning permission or community consultation. This is contributing to the loss of two pubs every week in Wales, and is allowing large supermarkets and betting stores to proliferate our high streets.

The inflexibilities of the current planning system does not reflect the Government's Regeneration Framework which encourages vibrant, viable and sustainable communities. The Welsh Government must therefore recognise that a key aspect of fulfilling this commitment is ensuring local facilities such as valued community pubs are protected.



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The easiest and simplest way of protecting pubs is by moving pubs into a Sui Generis category, which would ensure a planning application was always required before a pub could be demolished or converted.

Planning Applications for Change of Use

CAMRA supports the need to acknowledge the economic and social role of public houses in planning applications for change of use as expressed in point 10.4.5 of the consultation. Due to the inflexibilities of the planning system, popular and profitable pubs are vulnerable to unscrupulous developers targeting pubs for conversion.

The planning system needs to be rebalanced to give communities and Local Authorities the right to stand up to developers deliberately targeting valued community facilities such as pubs for conversion. Local Planning Authorities should be able to consider external factors before determining a planning application such as Local and Neighbourhood Plans, as well as the social and economic impact its loss would have on the local area.

Monitoring vitality and viability

Monitoring the vitality and viability of community assets, such as pubs, is incredibly important to maintaining a vibrant high street. One resource has been adopted by English Local Authorities is CAMRA's Public House Viability Test, which assesses both the current and future viability of a public house. The Test can be used in considering planning applications in Wales and to block changes of use to public houses which are financially viable and valued by the local community. The document is available to view at: <http://tinyurl.com/camratest>

Conclusion

In conclusion, CAMRA urges the Government to use this opportunity to refine the scope of the changes to Use Classes by taking action to promote and protect well-run community pubs. The easiest and simplest method of achieving this is to remove public houses from the A4 Use Class and place them in a class of their own (Sui Generis).

Please feel free to contact me if you would like to discuss any of these areas further.

Yours sincerely,

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