

Written additional evidence submitted by Institute of Place Management (IPM) for the English Devolution and Community Empowerment Public Bill Committee (EDCEB52)

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Section 1: Executive Summary and Institutional Statement

This supplementary paper has been produced by the Institute of Place Management (IPM) to accompany our formal response (Ball *et al*, 2025) to the English Devolution and Community Empowerment Bill. Developed through a series of structured roundtable discussions hosted by the Institute of Place Management, the process brought together experienced IPM Fellows (many of whom had worked as High Streets Task Force Experts) working across the diverse landscape of hyperlocal governance. Our position was further informed by contributions submitted in response to a public call issued via the *Journal of Place Management and Development* (the IPM’s official journal), inviting insights from practitioners, policymakers, and researchers on the future of devolution.

Our aim is to synthesise a considerable body of experience and evidence to ensure the Committee has an informed perspective from the hyperlocal level where the new duties in Clause 58 will be enacted - and where their success or failure will be most visible.

The purpose of this paper is to:

- Share the practical and structural challenges to effective hyperlocal governance observed during our national leadership of the High Streets Task Force (2019–2024);
- Explain what effective place governance looks like, drawing on our published research, evaluation, and the experience of our professional network

- Set out how changes to primary legislation, secondary legislation, statutory guidance, and programme design can support Clause 58 to realise its aims;
- Demonstrate what the Institute of Place Management - and the wider network of civic and professional actors we convene - can contribute to this process.

This paper looks at devolution from the bottom up. Our focus is on the places, partnerships, and people who will live with the consequences of this legislation. That is why we concentrate our response specifically on Clause 58, which introduces a statutory duty to secure “effective neighbourhood governance”. We welcome the intent of Clause 58 to introduce this statutory duty on local authorities to make a difference to the places where people live. The principle behind this part of the Bill is right: decisions that affect people’s everyday environments should be shaped and delivered locally, by those who know and care about those places. **But this link between governance and impact cannot be assumed.**

Too often, devolution has transferred responsibility without transferring the means to deliver (reference). The Bill, as currently drafted, risks repeating that mistake - focussing on governance structures rather than the outcomes that communities value: safer, greener, more vibrant and inclusive places (Parker, 2005a).

Clause 58 must therefore move beyond simply mandating local governance arrangements. It must say what those arrangements are for and how they will be supported to succeed. In practice, this means the Bill should:

- **Make the purpose of hyperlocal governance explicit.**

Place governance structures should exist to make *a tangible difference to local places*. Their mandate must be to improve outcomes that people can see and feel; clean, safe, active, and distinctive local environments.

- **Legitimise and strengthen existing local governance arrangements, whether or not they are statutory.**

The Bill must *recognise and build upon the place partnerships already delivering local renewal* - Business Improvement Districts, town teams, civic alliances, and community trusts - rather than displacing them with new structures.

- **Support delivery, not just compliance - with expert support, training, guidance and data, and long-term resourcing.**

Effective hyperlocal governance depends on capability *at every level*. Many local authorities lack the capacity to support neighbourhood action; combined authorities, soon responsible for devolution, must be resourced and required to connect these tiers. National government must, in turn, ensure a coherent framework that joins the dots between strategic and local delivery.

Section 2: Strategic Context and Problem Definition

England's system of local governance remains institutionally uneven and structurally incomplete. While reforms since 2015 have made progress in devolving powers to combined authorities and city regions, they have largely concentrated governance at the regional level - often bypassing the neighbourhoods, towns and town centres where democratic participation and civic action are more rooted (Beel, 2017 and 2021).

From 2019 to 2024, the Institute of Place Management (IPM) led the UK Government's High Streets Task Force (HSTF), supporting placemaking in over 150 towns and centres across England. The HSTF provides the most comprehensive, systematic assessment of how this is organised, enacted, and experienced at the local level. It revealed a consistent pattern: effective change was driven by a diverse range of actors and groups, in informal, agile, and non-statutory place partnerships (Parker *et al*, 2025a). Where regeneration failed, it was typically due to a lack of capacity, poor coordination, and the absence of any local convening mechanism (*ibid*).

In many locations, the most impactful partnerships were not those with legal status, but those with a shared place vision and local legitimacy. Business Improvement Districts, town teams, cultural consortia and other civic alliances often filled the governance void - delivering practical interventions, events, and even the long-term stewardship of their places. In contrast, some statutory structures persisted without delivering outcomes, existing primarily to fulfil formal process (Parker *et al*, 2025b).

Despite these successes, the Task Force also revealed deep structural weaknesses. Almost 40% of places had no recognised place partnership (Parker *et al*, 2005a). Only 6% of authorities created new place management roles during the programme, despite widespread need for dedicated coordinating capacity at the town centre and neighbourhood scale (*ibid*). Many councils lacked the capacity to identify who - if anyone - was taking any responsibility for their local centres, because some LAs were insufficiently connected to the broader 'place ecosystem'. Even fewer had access to common frameworks or diagnostics to guide decisions about how to effect change (Parker *et al*, 2025b).

2.1 The HSTF Legacy: A National Theory of Change for Place Transformation

From this delivery experience and evaluation, IPM developed a national Theory of Change for successful, people-powered regeneration. It identifies four essential and interdependent conditions for effective local delivery and formed the strategic foundation for understanding what Clause 58 must enable.

2.1.1. Place Management Capacity

Local authorities frequently lacked the people, roles, resources, and data needed to manage places effectively. There was limited awareness of what place management entails, or of the frameworks, standards and professional development available. Where local authorities invested in place management capability, they were better able to convene partnerships, support action, and maintain momentum beyond individual projects.

2.1.2. Partnerships and Networks

The presence of a trusted, multi-sector partnership was the single strongest predictor of successful engagement with the HSTF. Yet in nearly half of locations, no such partnership existed (Parker *et al*, 2025a). Where they did exist, these partnerships were often under-recognised, under-resourced, and overly dependent on the goodwill of a small group of volunteers. These structures must be nurtured, not assumed - and their legitimacy should come first from delivery, not designation.

2.1.3. Experience and Identity

People experience regeneration through their everyday lives. Yet statutory bodies, like councils, are tied up in the delivery of projects that take long time frames to deliver. HSTF data showed that local identity, activation, events, and visible change (e.g. picking up litter) were essential for rebuilding confidence and civic pride (Parker *et al*, 2025b). These were the quick wins that enabled long-term gains - but they were rarely prioritised in regeneration activities or governance structures.

2.1.4. Place Leadership and Hyperlocal Governance

Effective governance is impossible without leadership - but leadership cannot thrive without a mandate to act. The most successful places in the HSTF had local leaders who earned trust through delivery, not through title. These were individuals and partnerships able to convene, coordinate, and champion their place (Colledge *et al*, 2022). However, such leadership was often unsupported or invisible in 'official' frameworks.

In a few places, the HSTF was able to support the evolution of an effective place partnership into a form of hyperlocal governance - with significant influence over local authority decision-making and budget. This made a tangible difference, delivering shared gains for everyone involved: for the place, through better outcomes; for the local leaders, who had 'skin in the game' and were empowered rather than sidelined; and for the local authority, which could step into a facilitative role - enabling local leadership rather than directing or controlling it.

This is the potential Clause 58 must unlock. But it will only do so if it builds on existing partnerships, supports place leaders, and enables hyperlocal governance to emerge **from practice**, not from policy templates.

2.2 Implications for the Bill

The Bill, and specifically Clause 58, enters an existing governance ecosystem, one where capability, coordination, and legitimacy are deeply uneven. The HSTF Theory of Change sets out the enabling conditions for success. These are not hypothetical; they are drawn from real practice across England.

If Clause 58 is to deliver effective hyperlocal governance, it must do more than just expect local authorities to do this. It must also address the four structural barriers we expose in this supplementary paper.

1. **The Recognition Gap** – where local partnerships are active but invisible to formal governance;
2. **The Coordination Gap** – where strategic and hyperlocal actors operate in siloes.
3. **The Capacity Gap** – where those tasked with delivery lack the people, skills, knowledge, and data to act;
4. **The Delivery Gap** – where governance structures exist but local places do not improve.

The sections that follow explore each of these gaps and propose reforms to primary legislation, statutory guidance, and national support infrastructure to close them. These are not merely implementation issues; they are structural blind spots, in other words we believe they will fundamentally undermine the intent of devolution policy if they are not addressed. **But they are solvable** - if devolution is reimagined as a multi-level system, built on mutual recognition, shared accountability, and sustained investment in the people, knowledge, and practice of place.

2.2.1 The Recognition Gap

England's system of local governance, below the local authority level, is both structurally inconsistent and institutionally incomplete. Some communities benefit from long-standing statutory bodies, such as town or parish councils. Yet in many urban and post-industrial areas - especially non-parished localities - there is no equivalent structure to represent local interests or coordinate place-based activity. This is a well-documented problem in the academic literature (Beel *et al.*, 2017; Peel and Parker, 2017), and one now recognised in parliamentary discussions and policy reviews.

However, the absence of statutory arrangements does not equate to an absence of governance. In many towns and neighbourhoods, civic partnerships and informal networks already deliver critical governance functions - from coordination and convening to visioning, asset stewardship, and programme delivery. These include Business Improvement Districts, town teams, community development trusts, cultural consortia, faith groups, resident associations, and other hybrid coalitions that have evolved in response to local need. Research from the High Streets Task Force (Parker *et al.*, 2025a) showed that approximately

60% of supported locations had some form of local partnership in place, while around 40% had no active governance structure at all .

These informal but essential “invisible infrastructures” (Parker, 2025) are frequently overlooked in formal policy frameworks. They often lack legal status, formal funding, or a clear route into strategic decision-making. Yet their embeddedness, agility and track record in mobilising local change makes them invaluable. The HSTF evaluation found that the presence of a trusted partnership was the most consistent predictor of local engagement and success . These arrangements cannot simply be replaced with new statutory constructs; they must be recognised, legitimised, and nurtured.

Clause 58, as drafted, risks exacerbating this recognition gap. Its emphasis on “appropriate arrangements” without explicit reference to existing local partnerships may lead some local authorities to create new governance structures from scratch - even in places where effective, if informal, arrangements already exist. This risks duplication, disruption, or even displacement of effective partnerships.

As Wade and Galpin (2025) argue, governance must evolve from local practice - not be imposed by structural fiat. Beel *et al.* (2021) similarly warn that hyperlocal empowerment is undermined when local action is filtered through top-down institutional logics. Without deliberate scaffolding to support local actors, the Bill may reinforce existing asymmetries of power and visibility.

To close the recognition gap, the Bill must:

- Require local authorities to audit existing local partnerships and civic networks as part of their duty to secure effective place governance;
- Enable these partnerships - whether statutory or not - to be recognised in governance arrangements, with access to public resources and decision-making processes;
- Adopt a plural definition of governance that includes **but is not limited to** parish and town councils and reflects the full diversity of local actors shaping regeneration and stewardship.

As the IPM’s response to the Bill sets out (Ball *et al*, 2025) the term “neighbourhood governance” is too narrow in focus. A shift to “place governance” would better reflect the diversity of ways in which communities organise represent local areas.

The future of hyperlocal empowerment lies not in imposing new models and labels, but in recognising and resourcing what already works - bringing legitimacy, visibility and continuity to the coalitions already delivering change. Clause 58 should create the legal, financial, and institutional space for that recognition to happen.

2.2.2 The Coordination Gap

While England has made significant progress in devolving powers to combined authorities and regional mayors, this strategic devolution has not yet translated into a fully integrated multi-level system of governance. Hyperlocal actors - those most closely involved in the everyday stewardship of places - are usually disconnected from strategic planning and funding decisions.

The High Streets Task Force (HSTF) revealed this gap. Across its 150+ supported locations, we found that town centres, neighbourhoods, and local partnerships frequently operated in isolation from regional priorities and investment pipelines. Regeneration activity was often short-term, fragmented, or parallel to other government initiatives, rather than embedded within coherent place-based strategies (Parker *et al*, 2005a).

This was not due to a lack of local commitment. In many cases, community groups, BIDs, cultural consortia, and local partnerships were leading meaningful activity – not only in tactical terms...activating spaces, running events, coordinating stakeholders – but sometimes directly contributing to regional or national priorities - but had no clear pathway into the governance structures of those plans or priorities. Their intelligence and efforts were rarely linked to combined authority plans or national programmes.

This disconnect reflects what Lybeck (2025) calls a system of “layered incoherence” —a patchwork of initiatives and responsibilities that lacks clear subsidiarity or coordination. Rather than enabling subsidiarity, the system often reproduces fragmentation, with different tiers of government working to different cycles, datasets, and definitions of success. This is the reality of the context this bill moves into.

As the IPM Bill response highlights, existing effective local partnerships may find themselves accountable to their communities but invisible to their local authorities (Ball *et al*, 2025). Conversely, regional institutions may hold the purse strings but have no mechanism for meaningful engagement at the hyperlocal scale. The result is duplication, missed opportunities, and friction.

Wade and Galpin (2025) argue that this friction is not just operational, but conceptual. Without shared frameworks, common goals, or cross-tier trust, governance becomes extractive rather than collaborative. Beel et al. (2017; 2021) describe how strategic authorities may reproduce the same “democratic deficit” that top-down models were meant to overcome - delivering decisions about place without involving those already shaping it.

The HSTF demonstrated the benefits of overcoming this gap. In the minority of places where local partnerships were linked into local authority governance or combined authority strategy, outcomes improved, funding was better aligned, and capacity was shared. IPM also observed a shift in tone: from local actors being “consulted” to being treated as co-producers of change.

Clause 58 cannot succeed unless it recognises and resolves this coordination gap. A statutory duty to secure neighbourhood governance must be matched by obligations to **connect** those arrangements to wider governance tiers. Without this, hyperlocal bodies may be created, but remain siloed, under-powered, or symbolic.

To close the coordination gap, the Bill and its supporting framework must:

- Require local authorities and combined authorities to establish formal channels for coordination with place governance structures;
- Mandate the use of shared data frameworks, diagnostics and performance indicators to align strategic and hyperlocal goals;
- Encourage multi-level partnerships and delivery structures that span tiers of government, institutions, and civic actors;
- Include statutory guidance on how “effective place governance” is to be integrated into Local Plans, growth strategies, and devolution frameworks.

Without this vertical alignment, Clause 58 risks becoming a parallel track to devolution, rather than part of a system-wide shift towards empowered, collaborative governance.

2.2.3 The Capacity Gap

Clause 58 places a statutory duty on local authorities to “secure effective neighbourhood governance.” Yet the evidence gathered through the High Streets Task Force (Parker *et al*, 2005), the IPM’s response to the Independent Commission on Neighbourhoods (Parker, 2005) and our formal response to the Bill all point to a central problem: most local authorities have neither the capacity nor the expertise to deliver on this responsibility - or to assess whether governance is working once it is in place.

Through the HSTF, it was clear that many councils lacked the internal infrastructure to lead or support neighbourhood-level governance. Very few had dedicated officers responsible for place management, and many were unable to identify who - if anyone - was convening or coordinating activity in their town or district centres. In fact, just **6%** of authorities involved in the HSTF created new place-based roles during the programme, despite clear and widespread demand for that capacity .

Where improvement was reported, it was typically the result of HSTF expert support to a local partnership, not changes in local authority staffing or strategy. As the *ICON Evidence Brief* (Parker, 2025) explains, hyperlocal governance cannot succeed through legislation alone - it requires investment in local capability, including leadership development, diagnostic tools, and practical support for place partnerships .

Importantly, most authorities also lack the frameworks or benchmarks to evaluate what “effective” neighbourhood governance looks like. There is no standardised national tool to audit existing arrangements, assess their reach or inclusivity, or support improvement over time. As the IPM’s response to the Bill makes clear, placing this duty on councils without providing the means to enact it will only entrench existing inequalities (Ball *et al*, 2025).

For Clause 58 to be deliverable and impactful, the Bill and its supporting frameworks must directly address this capacity gap in local and combined authorities. Combined Authorities will be expected to have strategic competence for economic development and regeneration. This requires a shift in emphasis: from simply mandating governance structures, to building the capability to make them meaningful from combined authorities, down to local authorities, and then to hyperlocal governance structures.

We recommend:

- Providing dedicated funding for local authorities to establish or designate place management and place governance functions;
- Developing a national diagnostic and evaluation toolkit to help authorities baseline current arrangements and assess effectiveness over time;
- Embedding professional development and peer learning opportunities through a national support framework, grounded in tested HSTF models;
- Resourcing place partnerships - not just councils - to participate in and co-lead governance through grants, mentoring, and access to data.

Hyperlocal empowerment cannot be mandated without also being enabled. Clause 58 will only succeed if it is matched by serious investment in people, systems and learning that allow neighbourhood governance to emerge, evolve and endure.

2.2.4 The Operational Gap: From Structure to Function

Clause 58 establishes a new duty on local authorities to secure “effective neighbourhood governance.” But unless governance is resourced, equipped and focused on making better places, it risks becoming symbolic - creating new structures without enabling meaningful local change.

This is the operational gap: the mismatch between formal governance and real-world impact. It is where neighbourhood structures are created on paper, but lack the trust, skills, partnerships, or tools to deliver tangible improvements in the places people live, work, and visit. While Clause 58 introduces a welcome statutory focus on neighbourhood governance, it does not yet recognise or embed the operational model required to make that governance work in practice. This absence risks undermining the clause’s intent. Governance cannot deliver outcomes if it is structure without function. Place governance, to be effective, needs more than local authority compliance. It needs a delivery discipline - a shared theory of change, professional standards, tools, data frameworks, templates for partnerships, and access to mentoring and learning. These are the everyday ingredients of functioning local governance.

The absence of an operational model for hyperlocal governance manifests in three critical ways:

- **Theoretical underspecification:** There is no widely adopted theory of change underpinning hyperlocal governance - no national consensus on what success looks like or how to achieve it.

- **Lack of shared standards:** There is no nationally recognised code of conduct, partnership template, or competency framework to guide behaviour, decision-making, or collaboration between communities, local authorities and civic institutions.
- **Fragmented practice:** In the absence of a unifying delivery model, neighbourhood partnerships - where they exist - rely on variable tools, inconsistent data, and isolated practice. This makes delivery unpredictable and learning difficult to scale.

Yet these gaps are not inevitable. In England, they have already begun to be addressed through the discipline of place management. Place management is a professional and evidence-led approach to hyperlocal regeneration. It integrates diagnostics, stakeholder engagement, action planning, learning and evaluation into a single framework. It has been deployed and tested across 150 towns through the High Streets Task Force (HSTF) - and has consistently supported better coordination, shared vision, and practical delivery.

The IPM have already codified principles of place management into:

- The **4Rs Framework** (Repositioning, Reinventing, Rebranding, Restructuring) — a step-by-step process for diagnosing and designing local place strategies;
- The **25 Vital and Viable Priorities** — clear, outcome-focused interventions that support town centre transformation (Parker *et al.*, 2017; Ntounis *et al.*, 2023);
- A **Code of Conduct** for place managers and leaders — setting professional standards around inclusivity, transparency, leadership and delivery;
- Practical **templates and structures** for local partnerships - including Terms of Reference templates, stakeholder engagement models, and local governance plans.

These tools are not theoretical. They are already in use and embedded in IPM's CPD programmes, postgraduate qualifications, and national peer learning networks. To close this operational gap, the government should formally recognise **place management** as the model to underpin Clause 58. This would mean:

- Embedding tested frameworks, templates, and planning tools into national guidance;
- Adopting shared standards and light-touch codes of conduct for governance partnerships;
- Supporting professional development and peer networks to sustain delivery;

By doing so, the government can move from mandating governance structures to enabling effective, inclusive, and sustainable local delivery - the kind of delivery that visibly improves places and rebuilds civic trust. Members of the Institute of Place Management and Researchers at Manchester Metropolitan University are ready to support Government in this endeavour.

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