

Revised NPPF consideration in relation to The Lord Raglan applications 70213 and 70214

1. The [revised National Planning Policy Framework \("NPPF"\)](#) was published on 12 December 2024.
2. It contains a number of provisions which are relevant to the applications seeking listed building consent (70214) and planning permission (70213) for the redevelopment of The Lord Raglan – in particular those around redevelopment of existing buildings, specific requirements relating to listed buildings, development in the Green Belt and provisions relating to public houses.
3. For ease of reference, this statement sets out those provisions in the Applicant's view are most relevant. To assist officers we have included our comments alongside those references, identifying how the proposal for redevelopment and reuse of The Lord Raglan is supported in the new NPPF.

Provisions relating to Public Houses

4. There are no specific provisions addressing the redevelopment or reuse of public houses. Instead, public houses are referred to under the heading of "promoting healthy and safe communities", in which planning policies should "*plan positively for the provision and use of shared spaces, community facilities (such as [...] public houses)*" (para 98). Further, under "supporting a prosperous rural economy", the NPPF sets out that planning policies and decisions should enable "*the retention and development of accessible local services and community facilities, such as [...] public houses*".
5. However, these provisions have limited applicability to this planning application in circumstances where the Lord Raglan has been vacant and not in operation as a community facility for a number of years, and there has been no appetite to revert the building back into a public house.

NPPF Chapter 13: Protecting Green Belt Land

6. At paragraph 154, development in the Green belt is considered to be inappropriate unless it falls within an exception, which include (among others):

"(c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building"

[...]

(h) other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

[...]

iv. the reuse of buildings provided that the buildings are of permanent and substantial construction"

7. This provision is similar to the wording of the previous iteration of the NPPF from 2021 ("[2021 NPPF](#)"), at para 149. As such the analysis in Irwin Mitchell's Planning Statement Addendum (at paragraph 12 of that Addendum) still applies and remains our view; that the applications are consistent with the NPPF.

8. This proposal squarely meets the exception under paragraph 154(c) above, as it includes the extension or alteration of a building which is not disproportionate in respect of additions above or over the size of the existing building. The limited works of conversion proposed to The Lord Raglan sit neatly within this acceptable form of development.

NPPF Chapter 14: Meeting the challenge of climate change, flooding and coastal change

9. Reuse and redevelopment of vacant or abandoned buildings is not dealt with briefly in Chapter 14 of the NPPF where it highlights the need for the planning system to support the transition to net zero by 2050 and notes that it should “*encourage the reuse of existing resources, including the conversion of existing buildings*” (para 161) – highlighting the importance of redevelopment and renovation of existing spaces where possible.
10. Where proposals effect conservation areas or listed buildings, paragraph 167 directs local planning authorities to apply the policies set out in Chapter 16.

NPPF Chapter 16: Conserving and enhancing the historic environment

11. This Chapter sets out the policies that local planning authorities should consider when dealing with proposals that affect conservation areas and listed buildings.
12. The starting position is that substantial harm to or loss of Grade II listed buildings should be exceptional (para 213).
13. The NPPF notes, at paragraph 203, that:

“203. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

d) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

e) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

f) the desirability of new development making a positive contribution to local character and distinctiveness; and

g) opportunities to draw on the contribution made by the historic environment to the character of a place.”

14. This provision is carried over from the 2021 NPPF, where it is repeated word for word at para 190. The analysis therefore, set out in Irwin Mitchell's Planning Statement Addendum at paragraphs 65-66 still applies.
15. The harm of the proposed redevelopment here is considered to be less than substantial, and the NPPF provisions require that less than substantial harm is weighed against public benefits. As has been set out in the Addendum and elsewhere, the proposed development is seen to greatly outweigh the less than significant harm that might arise to the listed property in terms of the environmental, economic and social benefits that the development will bring.
16. Further, the NPPF sets out at paragraph 208, that:

“208. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact

of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal"

Conclusion

17. As above, this provision has been carried over from the 2021 NPPF (para 201). As set out above, we consider that the impact of the development on the heritage asset to be consistent with the NPPF provisions. This is particularly the case where The Lord Raglan is included in the group listing "for Group Value only" alongside the surrounding listed terraces. As one small part of the wider heritage asset, and the self-contained development of the building (in line with the exception above), we consider that the impact of the development on the setting of the heritage asset as a whole is acceptable under the NPPF provisions.

Irwin Mitchell LLP
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