



PLANNING BY DESIGN

FROM CONCEPT TO COMPLETION

Heritage Impact Statement

Full Planning Application for the Change of Use from F1 (Education Use) to Class E (Retail), and associated advertising signage at:

120 Boundary Road Camden London NW8 0RH

**Written and prepared by Planning By Design on Behalf of
Pascal Lavorel**

Introduction and Methodology

This Heritage Statement has been prepared by Planning by Design and was produced in October 2024 on behalf of Pascal Lavorel. This assessment is intended to accompany a an application for Full Planning Permission for the Change of Use of the site from Class F1 – children’s nursey, to Class E – Retail, to facilitate the opening of a flower shop, and the associated advertising signage at: 120 Boundary Road Camden London NW8 0RH (the site).

The aim of this report is to satisfy the requirement of paragraph 200 of the National Planning Policy Framework, last updated 2023. This paragraph requires that applicants should provide a description of the significance of any heritage assets affected by their proposals, including any contribution made by their setting. This assessment is informed by an analysis of the site, the existing buildings and their environs. The Heritage Statement is further informed by an analysis of historic maps of the area.

Heritage Planning Context

The site occupies the ground and lower ground floors of 120 Boundary Road, Camden, London NW8 0RH, part of a mid-terrace property on the western side of Boundary Road, within a mixed-use (commercial and residential) area. The most recent use of the ground and lower ground floor was as a children’s nursey, Use Class Order F1, however, it is currently vacant.

The site is located within the established development boundary. Whilst the building that the site occupies in not on the National Heritage List for England, it is situated within the St John’s Wood Conservation Area.



Fig.1 - Site Location Plan



Fig.2 – Photo showing the current external view of the frontage



Fig.3 – Photo showing the current external view of the frontage

Legislation, planning policy, and guidance.

The proposals should be assessed in accordance with the following policies and guidance which seek to protect the significance of designated heritage assets and their settings:

- Planning (Listed Buildings and Conservation Areas) Act 1990
- Planning (Listed Buildings and Conservation Areas) Regulations 1990 (as amended)
- National Planning Policy Framework (2023)
- National Planning Practice Guidance –Enhancing and Conserving the Historic Environment (Revised July 2019)
- Historic England’s Good Practice Advice in Planning Note 2 “Managing Significance in Decision-Taking in the Historic Environment”

- Historic England’s Good Practice Advice in Planning Note 3 “The Setting of Heritage Assets (2nd Edition)”
- The London Plan
- Camden Local Plan
- St John’s Wood Conservation Area Appraisal and Management Plan

National Planning Policy Framework (2023)

At the heart of the National Planning Policy Framework (NPPF) is a strong presumption in favour of sustainable development (paragraphs 11-14).

Paragraph 200 of the National Planning Policy Framework states that:

‘In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contributions made by their setting’

and to assess whether the proposed development meets the test of sustainable development as regards its impact on the historic environment.

The NPPF requires in the case of all heritage assets, designated or otherwise, that local planning authorities should take into account:

‘the desirability of sustaining and enhancing the significance of such heritage assets and of putting them to viable uses consistent with their conservation’ (NPPF 2023 paragraph 203a – previously 197a).

If the development will lead to 'substantial harm' to the significance of a designated heritage asset, paragraph 207 of the NPPF indicates that the development should be refused consent by the local planning authority, unless it can be proved that the loss or damage to the asset can be outweighed by substantial benefits to the public or if the proposal can meet a number of specific conditions. If the development leads to 'less than substantial harm' to the significance of a designated heritage asset, paragraph 208 indicates that this harm still needs to be assessed against the public benefit of the scheme and whether or not the viability of the site is being optimised.

Historic England Conservation Principles, Policies and Guidance

Paragraph 138 of the Historic England Conservation Principles, Policies and Guidance states that new work or alteration to a significant place should normally be acceptable if:

- a) there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place;
- b) the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed;

- c) the proposals aspire to a quality of design and execution which may be valued now and in the future;
- d) the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future.

Local Planning Policy

London Plan 2021

- ***Policy HC1 - Heritage Conservation and Growth***

A. Boroughs should, in consultation with Historic England, local communities, and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.

B. Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:

1) setting out a clear vision that recognises and embeds the role of heritage in place-making

2) utilising the heritage significance of a site or area in the planning and design process

3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place

4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility, and environmental quality of a place, and to social wellbeing.

C. Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

D. Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where

applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

E. Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

Camden Local Plan 2017

- **Policy D2 - Heritage**

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including Conservation Areas, Listed Buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Designated heritage assets

Designated heritage assets include Conservation Areas and Listed Buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including Conservation Areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site;*
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- c. conservation by grant funding or some form of charitable or public ownership is demonstrably not possible; and*
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.*

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Conservation Areas

Conservation Areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's Conservation Areas, the Council will take account of Conservation Area statements, appraisals, and management strategies when assessing applications within Conservation Areas. The Council will:

e. require that development within Conservation Areas preserves or, where possible, enhances the character or appearance of the area;

f. resist the total or substantial demolition of an unlisted Building that makes a positive contribution to the character or appearance of a Conservation Area;

g. resist development outside of a Conservation Area that causes harm to the character or appearance of that Conservation Area; and

h. preserve trees and garden spaces that contribute to the character and appearance of a Conservation Area or which provide a setting for Camden's architectural heritage.

Assessment of Significance

The Conservation Area

The site falls within St John's Wood Conservation Area, Western sub area - the boundary of which is shown in the map below:



Fig 4 - Map showing the boundary of the Conservation Area.



Fig. 5 – Map showing sub-areas of the Conservation Area – the site is within the West Sub Area

The Conservation Area Appraisal and Management Plan states:

“The St John’s Wood Conservation Area covers two geographically distinct areas totalling approximately 3.83 hectares that follow the south-western boundary of the London Borough of Camden alongside the edge of the City of Westminster. The two areas are geographically separate, but they both abut the St John’s Wood Conservation Area that falls within the City of Westminster. Since these two areas fall within the jurisdiction of the London Borough of Camden, they require a Conservation Area Policy specific to Camden. They do form part of a larger whole, however, that shares aspects of a common historical development and similar characteristics and special features

Designation

The initial designation of St John’s Wood as a Conservation Area in the London Borough of Camden was in March 1970. There was a subsequent extension in October 1977 that extended the western area and created the eastern area as it currently stands. The original St John’s Wood Conservation Area within the City of Westminster was designated in 1968.”

SPECIAL INTEREST OF THE CONSERVATION AREA - Context and Evolution

The St John's Wood Conservation Area is situated in two geographically distinct parts on the west of the London Borough of Camden immediately north-west and north of the boundary with the City of Westminster. The two areas form part of the larger cohesive area known as St Johns Wood that lies mainly within the City of Westminster and share much of the history and character of that area. Within Westminster much of St John's Wood has been designated as a Conservation Area since 1967 (extended 1979) and the designation of the St John's Wood Conservation Area within Camden in 1970 (and extended 1977) reflects the fact that the area and buildings worthy of Conservation Area status cross the modern borough boundaries, and require separate but complementary Conservation Area Appraisals and management strategies to be prepared by the individual Councils to satisfy planning requirements and ensure adequate levels of recognition and protection.

The areas of St John's Wood within Camden worthy of Conservation Area status and included within the current designation mostly belong to land originally in the ownership of the Eyre Family and Mr John Lyon, who later bequeathed his land to form part of the Harrow School Estate. However, whilst the land which is now Bolton Road and Boundary Road was part of the Eyre Estate, the remaining area of the western portion of St John's Wood Conservation Area formed part of the much larger Greville Estate. The area remained largely in agricultural use up until its speculative development in the 1820's and 1830's when it established itself as the first example of suburban residential development in what has today become an area of inner London.

The original pattern of development favoured individual and semi-detached villas set on generous plots, creating a vision of a rural suburb that reflected a departure from the dense urban development typical of London up until that time. The overall area also included the development of some more traditional terraces creating a mix of development density in some parts and creating a focus for small localised commercial areas and parades of shops.

Today the area maintains a mix of both residential and commercial uses, mostly minor retail (shops, bars, cafes and other small businesses), but its predominant use remains as housing set in a pleasant, relatively low-density, green, tree rich environment.

There are no Archaeological Priority Areas within the Conservation Area

Views and Vistas

Relevant to the application site, the appraisal notes the following:

Notable views relating to the St John's Wood West section include: i) View into the Conservation Area looking southwest along Boundary Road between the mid-19th century terraces.

Building Typology and Form

Relevant to the proposal, the appraisal notes the following:

Shops and small-scale commercial businesses feature in part of the St John's Wood West area. Here the mid-Victorian terraces along the north-eastern end of Boundary Road form a focal point for goods and services. Small streets of this nature leading off the busier primary routes are characteristic of St John's Wood. Reflecting historically a growth in commercial activity, they boast several well-preserved shopfronts and are home to useful local services and small independent retailers and restaurants. Public houses generally occur on landmark corner sites at the junctions of primary and secondary streets. They often retain high-quality Victorian embellishments worthy of preservation and typically enhancing the character and appearance of the Conservation Area. However, the public house that was located at 7 the corner of Abbey Road and Boundary Road, The Victoria, was not included in the St John's Wood Conservation Area designation, having been 'rebuilt' in 1960. It was recently redeveloped once more. The new five-story landmark building at this important junction, faced in white render, glass, timber and dark bronze, contains a medical centre, in addition to residential and retail accommodation.

Prevailing and Former Uses

The area has retained its status as a fashionable residential neighbourhood with large family dwellings set back from the street in substantial gardens, with mature street trees and trees in private gardens. The villas have largely escaped subdivisions into smaller units and are largely retained in their original use as single-family dwellings.

The area is therefore principally residential in character but combines areas and individual streets of commercial premises in a mix of retail and service uses that are secondary but complementary to the residential whole. The two separate areas within the current Conservation Area are characteristic of the two types of activity seen across the wider neighbourhood. The St John's Wood East area represents the quiet residential street while St John's Wood West combines the transition from residential villas and terraces to commercial terraces of shops, restaurants and services.

Historic shopfronts have survived relatively well in places. Earlier modifications of the late 19th and early 20th century complement the original detailing and illustrate the way in which occupation and activity within the area has evolved. Later additions and renovations have been much less sympathetic and inappropriate designs, materials and signage negatively impact on the character and appearance of the Conservation Area, particularly by interrupting the rhythm and continuity of the street.

Shops occupy only ground-floor levels for commercial activities with other uses, frequently residential, above. Office uses tend to occupy multiple floors of the 13 buildings. This mix of shops and other uses, their small scale and largely independent nature maintains the vitality and character of the area, and pre-empt the need for

residents to travel to larger commercial centres around Swiss Cottage and St John's Wood High Street.

Land use, activity and the influence of former uses - St John's Wood West

The character of the Western area of the Conservation Area is much less coherent with a variety of property types dating from a wider period of time. The mix of property types and uses help to give this area its special character, such as the commercial activity alongside mid to late 19th century residential terraces in Boundary Road. 20

The area has been developed in two main phases with larger residential properties of the 1820s to 1860s in the south-western end of the Conservation Area along Greville Place and Greville Road. However, parts of the north eastern end of the Western area represent a period of intensification in development in the later 19th century brought about by increases in land values that saw a move away from villas to terraced houses, such as the residential properties at Nos 1-8 (consec) Bolton Road, and the commercial purposes at Nos 98-132 (even) Boundary Road.

The uses of the buildings have remained very much the same as that for which they were originally intended. Although subdivision of some of the villas into flats has occurred they remain in residential use. Similarly the commercial properties along Boundary Road retain their original use and are now home to a variety of small businesses and professional services as well as convenience stores, restaurants, specialist retailers, an art gallery, a beauty parlour and a school of English.

Building Character and Qualities – St John's Wood West

....The commercial character of Boundary Road has a positive influence on the Conservation Area. It is reflected by the stucco-fronted, three-storey terrace with ground-floor commercial premises that runs from Nos 98 to 132 (consec). The terrace retains traditional shopfronts at many of the eighteen properties and these are an important feature of the street. An example of a high-quality modern shopfront incorporated into the traditional framework is the minimal glazing to be found at No 122. Other notable detailing on the terrace consists of rusticated quoins, simple architraves, parapets with cornices, and banding at second-floor level, though these are variously missing from some properties. Nos 112, 122 and 124 have basement areas surrounded by railings of various dates. Access hatches are evident at some properties, important historic survivals in the streetscape. The overall effect of the built fabric is proportionally harmonious alongside the wide, pedestrian friendly pavements. The terrace backs onto a modern residential mews development, Collection Place, which falls outside the Conservation Area. The site was formerly home to the Saatchi Gallery, and its steel entrance screen with coloured glass circular apertures is in the spirit of a Damien Hirst spot painting.

Townscape Character - St John's Wood West

.....The south-western residential portion of the sub area along Greville Place is spacious but not tree lined, as mature trees are confined to the gardens of houses lining the street. The road widens at the junction with Bolton Road, where Boundary Road begins, and the emphasis changes from residential to commercial uses at groundfloor level. Here also, the wider pavements allow the positioning of street trees that add considerable character to the street scene. The overall effect is such that, while the terraced buildings represent a higher density and greater intensity of use, the street feels wider and more spacious. The road may be busier here due to the presence of 27 shops and businesses but the wide pavements allow pedestrians considerable room for manoeuvre.

Buildings and groups of buildings that make a positive contribution to the Conservation Area

As a part of Boundary Road Nos 98-132 the site has been described as making a positive contribution to the CA, however, it is not highlighted as a shopfront of merit retaining traditional features

For new development, the Management Plan states:

New development within the Conservation Area should show special consideration to the elevational treatment, scale, bulk and massing of buildings and where possible respect the traditional forms and rooflines of the Conservation Area. Future additions and development must take care not to break away or detract from the traditional alignment and appearance of the existing building typology and form.

New development should reflect and reinforce the original rhythm and density of development of the streetscape. Subdivision of existing plots will be discouraged where it interrupts the rhythm and form of development of both buildings and boundary treatments, or results in the loss of features that contribute to the character of the area.

For alteration to existing buildings, it states:

Alterations and extensions can have a detrimental impact either cumulatively or individually on the character and appearance of the Conservation Area. Examples which should not be allowed to affect the character of the area include:

- *External painting, cleaning and pointing of brickwork which varies from a uniform approach;*
- *The deliberate removal or loss through neglect of historic features or detailing from buildings and their boundaries;*
- *The replacement of historic fabric with materials or details that do not match the originals, such as inappropriately detailed or proportioned doors, windows, downpipes or railings;*

- *Extensions that negatively affect the scale, symmetry, or relative dominance of parts of villas or pairs of villas;*
- *Roof level alterations and extensions that interrupt the consistency of otherwise uniform features or terraces;*
- *Satellite dishes and aerials visible from the street.*

As such, alterations and extensions to existing buildings should be carefully considered. Extensions should be subsidiary to the existing building and not detract from its character by becoming over-dominant.

Where alterations and extensions of a sympathetic scale are appropriate, attention to detail and an imitative, historicist approach are to be encouraged without allowing pastiches of historical features that may reflect current tastes but are less appropriate to the style and detailing of the original building and which may detract from the overall integrity of the group.

Where original features and key details have survived, they should be retained and preserved in all but the most mitigating circumstances, and good maintenance and repair rather than replacement is the most appropriate action to retain the original historic character of the area. Outright replacement would only be appropriate when no other reasonable alternative is available.

Where original features and details have been lost, their replacement with appropriate high-quality reproductions that positively contribute to the character and appearance of the Conservation Area is to be encouraged.

Alterations to and the loss of original boundary treatments are to be discouraged and the removal of boundary treatments to create areas of hard-standing for parking is in most cases inappropriate.

For changes of use it states:

The uses within the St John's Wood Conservation Area have remained fairly static over time. Properties in residential use have largely remained so, internal changes often relating to the sub-division of large properties into flats rather than conversion to alternative uses. This increase in density generates increased need for parking and the quantity of waste produced and this can be a problem. Similarly those properties with commercial uses at ground-floor level tend to have retained such activities, though the types of occupiers may have changed from original users such as grocers, bakers, butchers and other small independent merchants to convenience stores, restaurants, specialist retailers such as galleries or picture framers and other small businesses and offices. Changes that could impact on the character of the area include:

- *intrusion of uses other than residential into the areas characterised by a uniformity of residential use;*
- *an increase in density of use due to development in the back gardens of residential villas;*

- *loss of historic shopfronts;*
- *loss of vitality in commercial areas arising from the loss of a mix of small-scale uses and a range of independent businesses including offices, shops, and restaurants;*
- *loss of vitality in commercial areas arising from the granting of uses that do not provide active street frontages;*
- *amalgamation of terraces or pairs of villas to accommodate a larger use.*

The CA management plan also notes under management of change:

Commercial Developments

The shopfronts that remain from the 19th and early 20th centuries are an important element in the character of commercial parts of the Conservation Areas. The important historic shopfronts have been noted in the appraisal.

All historic shopfronts in the Conservation Area contribute to the special character and their retention is particularly important. The Council expects all historic shopfronts to be retained and restored in an appropriate manner.

The installation of new shopfronts, shutters, and grilles, together with most alterations to existing shopfronts will need planning permission. Poorly designed shopfronts detract from the character and appearance of the Conservation Area. External roller shutters are unlikely to be acceptable and internal security shutters that retain visibility into the shop unit are a preferable alternative. The Council expects the quality and design of new shopfronts to respond sensitively to their historic setting and, importantly, the building frontage as a whole."

Changes of Use

The Council will keep under review changes of use to see whether particular policies are required to protect the character of the area.

Heritage Impact of the Proposed Development

Proposed Development

Planning permission is sought for the proposed change the use of the ground and lower ground floor of 120 Boundary Road, from Use Class F1 to Use Class E with associated advertisement signage, to facilitate a flower shop.

As part of the proposal, there will be minor, attractive alterations to the shop frontage, and the installation of business-related advertising. The fascia signage and projecting sign are subject to a separate advertisement application, however, brief details are included here for completeness. The graphics will be applied directly to the existing fascia pane and will avoid flashing illumination.

The floorplan of the site will not be altered, as alterations proposed are primarily related to the internal fit-out including shop furniture and redecoration, all of which will support the new enterprise at the site.

Further information and the design and specific layout of the proposal can be found within the accompanying planning drawings, and design and access statement.

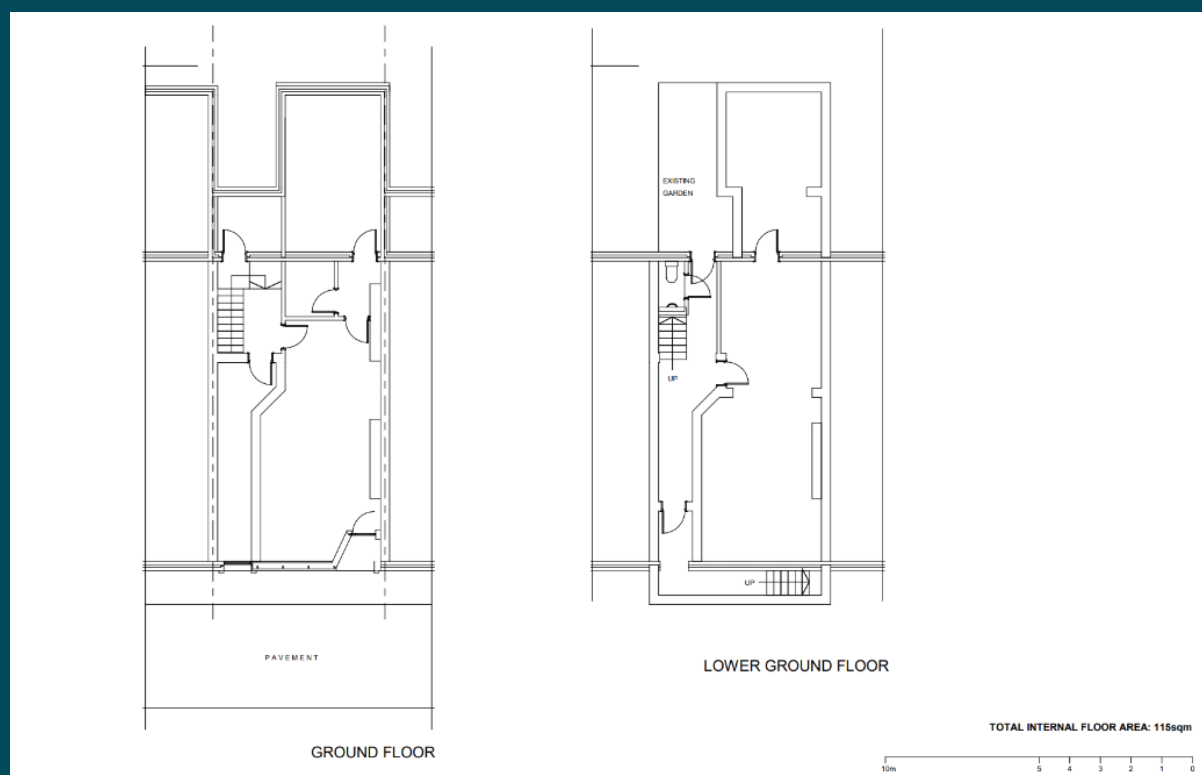


Fig. 6 - Existing and Proposed Floor Plans. (Not to scale please see supporting planning drawings).

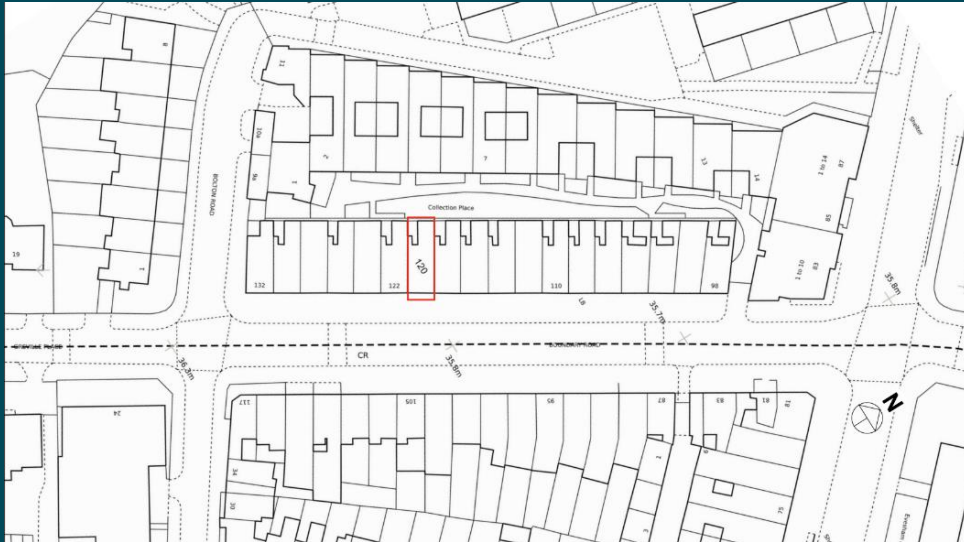


Fig. 7 – Existing and Proposed Block Plan. (Not to scale please see supporting planning drawings).



Fig. 8 – Existing and Proposed Elevations. (Not to scale please see supporting planning drawings).



Fig. 5 – Proposed Signage

Assessment

The works proposed through this application will have no material impact on the significance of the building, nor its immediate setting, in particular relation to the Conservation Area. The proposed use as a flower shop is wholly appropriate to the character of St John’s Wood Conservation Area and Boundary Road, where similar shop fronts and commercial uses are prevalent active uses at the ground floor. The proposal will create a high-quality new shopping unit within this “High Street” feel road. The existing large windows on the principal elevation lend themselves to an enticing retail shop, with a window display expected to be of beautiful colourful flowers, which will complement the attractiveness of the Conservation Area and views along Boundary Road. The proposed advertisements and signage on the frontal elevations will also be appropriate in scale and design to ensure it suitable to the Conservation Area.

It is likely that this previous use of the site was retail, as evidenced by the shop frontage that has been retained whilst the site has been in use as a language school. This means that the conversion to retail will be readily achieved, with minimal work required to the external elevations of the ground and lower floors.

The proposal involves no material adaptation of the interior floorplan of the building to support the proposed use, with the proposal only involving minor redecoration of the interior. The interior design and furnishings will be chosen to be sympathetic to the character of the space, ensuring a cohesive and harmonious integration of the business within the existing fabric of the building. The proposed change of use will be designed and executed in a manner that respects and complements the architectural style and period of the building.

By altering the usage of the ground and lower floors of the building to a retail unit, and specifically a flower shop, the proposal will ensure that the building is returned to an active use, with active frontage. The unit is currently vacant, and the change of use to Class E, will increase the options for the use of the ground and lower ground floor, more appropriate to the wider retail context. This new classification will ensure that the broader uses under Class E provide to ensure the unit avoids becoming vacant. It is understood that vacant units can readily fall into disrepair and appear neglected. Vacant buildings are more susceptible to deterioration and damage, from water ingress, vermin infestation and even unlawful occupation or squatters. When vacant buildings become neglected, this can make the street less attractive for other businesses, and patrons. Vacant units steal vibrancy from active use areas. These all risk impacting on the heritage setting of the Conservation Area. By introducing a new use, such as the proposal, the building is revitalised, and its maintenance and preservation become more viable. The new use will ensure that the unit contributes to the heritage setting, as a positive building, rather than a neutral or negative building.

Furthermore, a flower shop will be a public-facing establishment that will attract visitors and local customers and tourists. The new retail use as a florist will contribute to the local economy, encouraging spending in the street more widely. Increasing the foot fall through the provision of attractive and appealing retail offer will also allow people to experience and appreciate the historic setting of the Conservation Area. Arguably the proposed use as Class E is eminently more appropriate in this location than the current use class F1, and previous use, as a children's nurse. The proposed use accords more with the surrounding and historic uses. A new Class E business here works to conserve the Conservation Area's heritage value, further promoting its long-term preservation, as well as contributing to the vibrancy and vitality of Camden as a whole. As such, the proposed use provides an optimum use, which causes the least harm to the significance of the building and its setting and secures its long-term viability.

The design and usage have been chosen to be sympathetic to the historic character of the space and wider Conservation Area, ensuring a cohesive and harmonious integration of the business within the existing fabric of the building and Conservation Area.

6. Conclusion

It is considered that no harm will occur to the building or the Conservation Area or the area's historic significance. The proposed change of use will be designed and executed in a manner that respects and complements the architectural style and period of the building and surrounding Conservation Area. The use can also be considered suitable to the character of the area and is compatible with surrounding uses along Boundary Road.

The proposal will bring about several benefits, such as the fact that changing the use of the building, helps maintain the historic fabric of the building by ensuring its continued use, preserving the existing architectural features, sensitively integrating the new use within the building, promoting ongoing maintenance, and fostering public engagement with the historic fabric. The proposed development presented in this application is policy-compliant with sections 16 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and section 12 (Conserving and enhancing the historic environment) of the NPPF.