

3rd July 2022

The Revd Andrew Cinnamond
Mr Nigel Jones

By e-mail:
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nigeljones11@aol.com

Dear Mr Cinnamond and Mr Jones,

Notification of Advice

Re: St Lawrence's Church, Lechlade – Major reordering of the church and works affecting the churchyard

At the meeting held on 22nd June 2023, the DAC considered the faculty application for a major reordering and external works at St Lawrence's Church, Lechlade. Committee members had access to all documents uploaded in support of the faculty application by the PCC via the Online Faculty System, the relevant planning application 23/01355/FUL, and the booklet dated February 2023, prepared by the project team for the purposes of community consultation. The DAC agenda circulated to all members prior to the meeting was accompanied by all formal consultation responses the DAC received in response to the scheme, recording the statutory consultees' advice, comments, and objections.

Members were reminded that in line with the DAC's constitution, the Committee: 'Shall in all its work have due regard to the role of a church as a local centre of worship and mission'. Therefore, the DAC's assessment of any proposed change or 'harm' to the significance of the church as a listed building considered what would be gained by the worshipping community and other users of the building as a result of the proposed changes. Members of the DAC were reminded about the history of the scheme's development and that the first DAC site visit to discuss the principle of a reordering took place in April 2018. Many conversations between the PCC and the DAC happened since then. The DAC has remained supportive of the principle of a reordering and the overarching objectives of the scheme which aim to make the building a more community-centred, mission-focused, and sustainable church for the benefit of the current congregation, the wider community, and future generations.

Reflecting on the statutory bodies' comments received in response to the application, the DAC were reminded that the very initial proposals the DAC commented on in 2018/2019 were based around

the idea of building a church extension; something which was rejected by the Committee from the outset, due to the significance of the church and its churchyard setting, and the archaeological impact such an intervention would have. The option of creating facilities required by the parish in the Church Cottage were also considered, but also rejected at the time, as the future of the building is not clear and neither the PCC nor the DAC was convinced that splitting church activities between two buildings was feasible long-term. The DAC emphasised that the Cottage is not subject to faculty jurisdiction and not formally part of the PCC's proposals. Therefore, the DAC decided not to discuss further the building's suitability for meeting the objectives the PCC clearly outlined in their Statement of Needs.

While the DAC supported the idea of exploring options of housing all the required facilities under one (church) roof early on, it stressed on numerous occasions that the historical, architectural, and artistic significance of the grade I listed church of St Lawrence - which makes it a building of national importance and exceptionally significant - meant that a thorough assessment of the building's significance and the consultation process with relevant stakeholders would be key to the success of the application, and effectively the scheme itself. This was later confirmed by the keen interest of statutory consultees in this project and impact, and their advice; both informal and formal. The Committee has been clear in all its communication with the PCC that a number of compromises would need to be reached in order to achieve a feasible scheme for the DAC to recommend to the Chancellor.

Ten voting DAC members and one non-voting DAC consultant took part in the debate on 22nd June 2023. Two DAC members who were absent at the meeting emailed their written comments to the DAC office and those were shared with the DAC during the debate. The Chair requested that individual aspects of the proposed scheme are discussed separately. A number of formal votes followed, when the Chair judged them to be helpful to reaching a consensus.

I. The external elements of the scheme

The DAC noted the advice of the planners, which indicated that they would not support the proposals as submitted. It was emphasised that both a faculty and planning permission are required to have them incorporated into the final scheme. The Committee discussed each individual proposal separately.

- a. The DAC would recommend the removal of the Georgian gates and their replacement with timber doors if the planners were persuaded to drop their objection. The DAC agreed that if the north porch is to become the new main entrance to the church, it should be more secure and welcoming than it is now. Weatherproofing is a relevant consideration too. Should the planners be persuaded, the DAC would like to see the gates sold to as architectural salvage, in line with the advice of Historic Buildings & Places. The gates must not be destroyed.

A formal vote to support the above was called: 6 for and 4 against.

b. The DAC noted that the planners do not agree with the proposal to relocate plain leaded light and stained glass windows to the south elevation. The DAC advised the PCC in March 2022 that it did not think there was a strong justification for relocating the windows and suggested the PCC to remove this item from the scope of the scheme.

c. The DAC thought that the proposed location of ASHP was right, but the enclosure appears unnecessarily large. The acoustic screen appears to be increasing the footprint and the visual impact of the heat pumps needlessly. The selected heat pumps are quiet units and would be positioned 11 metres away from the neighbouring property. Moreover, the specification shows a heat pump of this type needs to be 300mm off the back wall, with 500mm in front and 10mm to the side. The proposal suggests 500mm off the back wall and 1000 from the front and 450 from the sides. A much tighter arrangement could convince the planners to revisit their advice. As it stands, the proposed option has an unacceptable impact on the setting of the grade I listed church. The DAC will await advice from planners, before commenting further.

d. The path to the vestry must be made with reclaimed stone matching the stone used recently to pave Shelley's walk and not made with new stone.

e. It agreed that the proposed location of sheds, their size and design are unacceptable. The DAC will await advice from planners, before commenting further.

f. All other points made by planners were noted and no further comments were made by the DAC.

2. Internal elements of the scheme

a. The DAC will recommend the removal of all pews, but four, which according to the proposals are proposed to be shortened and repositioned within the chancel. It did not feel that retaining pews in the nave will have any practical purpose. Any number of retained pews would be unlikely to be used and would take up storage space. The Victorian Society's suggestion of retaining a 'meaningful block of benches' would, in effect, jeopardise the main objectives of the scheme. The design and number of chairs must be confirmed and agreed by the DAC.

A formal vote to support the above was called: 8 for, 1 against, and 1 abstention.

b. The DAC will recommend the replacement of flooring with stone. However:

- It requires more information on the impact on the south door and how that will be affected by the changing floor levels.
- It wishes to see a decorative motif incorporated into the new floor to visually break up the large expanse of flooring of the same colour and texture.

A formal vote to support the above was called: 7 for and 3 against.

- c. The DAC will recommend the west gallery of the proposed footprint, but not to the currently suggested design(s). An acceptable design will be one that is in keeping with and sympathetic to the significance of the church interior. The quality of craftsmanship of this new intervention must reflect and enhance the significance and character of the church. Structural glass should be avoided. The DAC wishes to be involved in the conversation with the project architect on suitable design options early on.

A formal vote to support the above was called: 8 for and 2 abstentions.

- d. The DAC wishes to see more detail regarding the suspended flooring in the base of the tower. The PCC should reconsider whether the heating solution chosen for this space is the most suitable one. The recording of the ledgers will need to be carried out by an archaeologist and archived in line with best practice. If the underfloor heating option is to be pursued, detailed drawings should demonstrate how the ledgers would be protected and isolated.

- e. Having thoroughly considered the case made by the PCC, the DAC has made a decision not to recommend the removal of the chancel screen. It also resolved not to revisit this advice again. As the Committee previously emphasised, it was not convinced that the overall success of the reordering will depend on this particular aspect of the proposed reordering. It was noted that the screen is a significant item and a witness to the Victorian reordering of the church. While two prominent writers were quoted in the application, the DAC did not agree that the screen was ‘heavy’ and that it would impede church services and other activities once flexible space in the nave was created. The DAC did not think that moving the screen within the church, repurposing it or modifying it would be acceptable. It found the comment made by SPAB about: ‘acceptable minor modifications that might be made to the screen to reduce the heaviness noted by Simon Jenkins’ most unhelpful.

A formal vote to support the above was called: 10 for

3. The chancel and potential future projects

The DAC strongly felt that not only the chancel screen, but the whole of the chancel should be preserved as is, at least until the reordering has been completed and the parish has had an opportunity to use the newly created spaces and facilities over a period of time. It was noted that previous plans of reordering the chancel space have been withdrawn and are not part of the current scheme, but the DAC wished to reemphasise that making changes to the chancel should not be revisited at any time soon and not unless there is a very good reason to do so. With that in mind the DAC resolved that it will not be prepared to consider any proposals for changes to the chancel, including the chancel screen, for a period of at least 5 years.

A formal vote to support the above was called: 7 for and 3 abstentions.

4. Other documents and details the DAC wishes to approve before work commences:

- a) A set of finalised scheme drawings, reflecting the final proposals, taking into consideration the advice of the DAC and planners, once all details are agreed. These should include annotated plans, sections and elevations, along with all of the necessary relevant details i.e. floor build-up, joinery details; generally and of the storage units, and any glazing, if still applicable as part of the scheme, as well as doors, stairs, gallery, screens, WCs and kitchen etc.; along with a full written specification and schedule of works to support the drawings.
- b) A suitably qualified and experienced structural engineer and M&E engineer (for the part of the scheme with regard to heating, lighting and AV etc.) should be involved in all relevant stages of the design process and liaise closely with the project architect, to ensure that all aspects of the scheme can be adequately integrated without compromising or impacting upon other aspects. Evidence of their involvement will be required.

5. Archaeology

a) Watching brief

Prior to the commencement of any construction work an archaeologist must be appointed to undertake a watching brief during all ground and floor disturbance associated with the works. The DAC Archaeological Adviser will issue a suitable brief for archaeological recording. Please contact the DAC secretary before appointing an archaeological contractor.

A competent and professional archaeologist or archaeological organisation will be appointed to undertake the required levels of archaeological recording. The individual or organisation will be able to demonstrate suitable experience of archaeological excavation, including church archaeology and a proven track record of archaeological excavation and publication. The archaeological contractor shall be or be managed by a Member of the Chartered Institute for Archaeologists and will adhere to the Chartered Institute of Archaeologists Code of Practice for the Regulation of Contractual Arrangements in Field Archaeology.

b) Report

On completion of the on-site work a report on the results of the work should be prepared for the parish, the Diocesan Archaeological Adviser, the DAC Secretary and the County Historic Environment Record.

c) Archive

Arrangements must be made for the deposition of the site archive and finds in an appropriate local museum. The digital archive must be deposited with the Archaeology Data Service <https://archaeologydataservice.ac.uk>. Summary reports should be disseminated as appropriate, either by submission to the Bristol and Gloucester Archaeological Society's Proceedings for inclusion in the annual round-up of work in Gloucestershire or OASIS, the online system for reporting archaeological investigations: <https://oasis.ac.uk>

6. Sustainability and 2030 Net Zero target

The Faculty Jurisdiction (Amendment) Rules 2022 require churches to have due regard to the Church Buildings Council's advice on Net Zero Carbon, for those proposals where it applies: <https://www.churchofengland.org/resources/churchcare/net-zero-carbon-church>

The DAC, guided by its Sustainability Adviser felt that the PCC's proposals relevant to environmental sustainability are sensitively balanced. It was noted that during the evolution of this project the Net Zero Carbon requirements have developed very considerably. One could take a view that this proposal is no attempting to be Net Zero Carbon and therefore criticise it for such but given its history and lengthy development the DAC was content that the proposal makes a balanced contribution to decarbonisation and in reusing the existing boilers that have life left in them. The DAC was content that this is the right balance in achieving the 'least worst' heating solution for the current time. However, the DAC was concerned that the proposals do not include a specific statement on how this project will have 'due regard for the CofE Net Zero Carbon guidance'. This is a legal requirement for a faculty application and must be sought. The DAC did not think it will change any substantial part of the actual design, but the Committee would like to see this, and in particular, a paragraph on how, when the exiting boilers reach the end of their life in 10 years' time, the current design is able to be adapted to a decarbonised future heating source. This future proofing of the scheme is critical.

The DAC noted that this is perhaps the first time that the Victorian Society urged this DAC to consider the environmental impact of a reordering project. This was welcome. The Committee agrees with the Society that: 'the embodied energy in the floor and the benches is significant, added to which the proposed new floor, seating, and extensive amount of steelwork and glazing that would be required in the new gallery would have a major environmental footprint'. The statement requested in the previous paragraph must explain how the PCC is planning to offset the carbon footprint of this project.

7. The relationship with the bell ringers

The DAC remains concerned about the prospect of straining the PCC's relationship with the bell ringers as a result of the proposal to turn the ringing room as a multipurpose space. The DAC has

signalled before that it would not oppose the proposal subject to a clarification from the church insurance company that it was comfortable with the proposed auxiliary use and subject to a protocol that would describe how the space would be shared. Said protocol must be clear that the primary purpose of the space is bellringing and that it will have priority over any other uses.

8. Objections from statutory consultees

- a) Historic England – Strongly objects
- b) SPAB – Objects
- c) The Victorian Society – It wishes to be served a Special Notice by the Chancellor, which will enable them to make further comments on the scheme.

9. DAC Recommendation and options for the PCC

The DAC voted to recommend the scheme (**votes by Members: 6 – recommend subject to conditions, 1 – do not object, and 3 – do not recommend**), subject to the above provisos and advice, as well as securing planning permission for relevant elements of the scheme. Additional details and clarification requested will need to be scrutinised and approved by the DAC in writing prior to the commencement of works.

The PCC can:

1. Accept the advice and recommendation of the DAC with provisos as stated above and ask the Committee Secretary to forward the application to the Registrar.
2. Inform the DAC that it wishes to retain the proposed removal of the chancel screen as part of the scheme and ask the Committee's Secretary to forward the application to the Registrar with the DAC's objection to that part of the scheme upheld.
3. Withdraw the application.

Please note that the first two options will trigger a public notice period and will enable members of the public to view application details and submit representations to the Registry.

The response of the DAC in the form of this letter will be shared with the National Amenity Societies, Historic England and the Church Buildings Council. It will be attached to the faculty application and will be available to the public during the public notice period.

The PCC is requested to write to the DAC Chair and the DAC Secretary to confirm that Council members understood the advice given above and any comments it wishes to make. The PCC should confirm to the DAC which one of the three options it wishes to pursue by resolution.

Yours sincerely,

A handwritten signature in black ink that reads "Adam M Klups". The signature is written in a cursive style with a long horizontal stroke at the end.

Adam M Klups
DAC Secretary
Diocese of Gloucester

Cc:

The Revd Canon Dana Delap – DAC Chair
The Archdeacon of Cheltenham
Paul Cobb – Lechlade PCC
Richard Codd – Project Architect