



**St Lawrence Church**  
LECHLADE-ON-THAMES



Lechlade St Lawrence PCC

Version 1

June 2023

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## Comments log – Statutory Consultees

This document provides a written response to the comments raised by the statutory consultees, namely (in alphabetical order)

- A. The Church Buildings Council
- B. Historic Buildings and Places
- C. Historic England
- D. Society for the Preservation of Ancient Buildings
- E. Victorian Society
- F. Georgian Society

Please note that in responding to comments:

- (i) Where matters are already explained or justified in supporting documentation then we reference the relevant section, usually in the Statement of Need (v18), and other documents. Additional explanations have been provided where further clarification is needed.
- (ii) We identify areas where we have compromised following advice at the informal consultation stage.
- (iii) Where relevant we explain the options considered and the constraints within which these are evaluated. This optioneering was carried out at the feasibility stage and at detailed design. Feasibility reports are available on the faculty portal. The architect's detailed design option analyses are available in sketch form should these be required.
- (iv) Several comments can be addressed by a detailed read of the Chedburn Codd feasibility study on the faculty portal.
- (v) Where appropriate we have sought further advice from our professional team: our architect, Richard Codd of Chedburn Codd conservation architects, David Gadsdon a partner in the consultants Environmental Engineering Partnership (EEP), our structural engineer Andrew Turner and Chiz Harward our archaeologist (who also wrote the Statement of Significance). EEP has prepared an additional report to explain the heating option selected and the options considered in siting the ASHP. Chedburn Codd has prepared a 'Design and Access Statement' to support the planning application to Cotswold District Council. Both these reports have been placed on the faculty portal
- (vi) Some of the comments are repetitive but we have endeavoured to respond to each point raised by all consultees, and we have been consistent with our responses.

**A. Church Buildings Council (CBC) – visited St Lawrence church on 22<sup>nd</sup> October 2021**

From	Date	Comment	Response
CBC1	10 <sup>th</sup> May 2023	The Council appreciates the work that has been done by the PCC to develop the proposals and respond to the advice given, both in adjusting the impact of the scheme and providing stronger statements to justify other elements.	Thank you in recognising the changes we have made to accommodate the earlier views of the CBC
CBC2	10 <sup>th</sup> May 2023	The Council is content to leave comments on other matters to the DAC.	Noted
CBC2	10 <sup>th</sup> May 2023	In its letter of December 2021, the Council expressed concern about the proposed relocation of the chancel screen, noting that its removal to the west end of the building would take it out of its context. The present proposal to remove the screen from the building would take the screen even further from its context. The Council noted that this is the work of an architect described in the statement of significance as regional. The screen remains as a significant piece of their work in the county they were associated with.  The Council noted that the plans of how the church is proposed to be used in its reordered state did not show the screen to impede that use or strengthen the case for its removal. The Council noted that any proposal to remove the screen from its present location, either in the church or to elsewhere, should provide details of its future location. The Council's strong preference is for the screen to remain in place	See comment in HE4

**B. Historic Buildings and Places (HBP) - visited St Lawrence church on 22<sup>nd</sup> October 2021**

From	Date	Comment	Response/ Action
HBPO1	13 Apr 23	In summary, we are truly appreciative of the willingness of the parish to compromise, remembering that we didn't oppose the far-reaching changes within the nave and the west end which will of themselves radically alter the interior and dramatically improve flexibility and usefulness. The only point of contention remains the screen. The parish have already accepted the advice of the CBC to postpone works to the chancel. The screen is part of the chancel. Why not leave its fate to be decided when that of the chancel as a whole is considered?	Thank you for recognising the compromises we have made to accommodate the earlier views of the CBC and HBP
HBPO2	13 Apr 23	<p>We are delighted at the degree to which the petitioners have listened to our representations and met many of our concerns.</p> <p>a) It is good to see that the Statement of Significance has been corrected to include those elements which we felt had hitherto been undervalued.</p> <p>b) We recognise that the postponement sine die of works to the chancel (with the exception of the screen on which see Sections 3 and 4 below) is a major concession and we applaud and recognise it as such.</p> <p>c) We are especially pleased to note that the inner lobby immediately inside the north porch has been dropped altogether and that the spaces under the new gallery will now be symmetrically expressed. (We presume that it follows from the dropping of the lobby that the War Memorial will not now need relocated).</p> <p>d) We applaud that fact that the south aisle chapel (St Blaise) is now to be largely retained with the exception of the Mowbray reredos and the re-siting there of the ledger stones with brasses (now unencumbered either by tables and chairs or cupboards). We would hope that the reredos will be sold or transferred to another church and will not be destroyed.</p> <p>e) We still must regret the loss of the 1828 gates in the north chapel but in light of the acceptability of the design for the door in their stead we can now withdraw any formal concerns. We hope nevertheless that the</p>	<p>Thank you for your comments.</p> <p>Noted with thanks.</p>

From	Date	Comment	Response/ Action
		<p>gates will be sold into the architectural salvage market and will not be destroyed. We trust that the works to the porch will retain the penance stone and the coffin bier. Can this be expressly confirmed on the drawings?</p> <p>f) In our first representations we suggested that representative examples of Waller’s pews be retained, and we note that 4 (truncated) versions are now to be re-sited within the chancel (instead of the visually unimportant and modern stalls which sit there now). This is welcome.</p> <p>g) The drawings seem quite clear that both the parclose screens, north and south, are now to stay. This is welcome and we raise no concerns over the new “door” intended to allow access to the organ.</p>	<p>The penance stone has been retained within the new footpath.</p> <p>We shall store the coffin bier in the church tower.</p> <p>Pews – noted.</p> <p>Noted.</p>
HBP03	13 Apr 23	We note that the ledger stones at the base of the tower are still to be covered by the new floor. We trust that a membrane will be applied over the stones and beneath the new floor to prevent damage to them and to allow possible exposure at a future date. We trust that they will be fully recorded before being covered.	The floor in the tower is to be timber construction which can be removed to inspect the ledgerstones as may be required. The reason for the timber floor is to route new services – 3-phase electricity and water - coming under the west door to be hidden but accessible.
HBP04	13 Apr 23	Are the font and lid reunited ? 9.2. in the Statement of Need and Drawing 011A are not clear on this whilst Drawing 017 seems all too clear that they are not to be. The 18th century timber ogee cover is a splendid piece and it deserves better than to be relegated into a corner.	The timber ogee will be retained although its location is still to be decided.
HBP05	13 Apr 23	The documentation implies that the present carpet in the sanctuary is to be replaced rather than removed. It would be good to know what the carpet before such a decision is underneath is taken.	Investigations have shown that the floor under the carpet is a concrete construction following the removal of a step during the 1980’s. The carpet will be replaced.
HBP06	13 Apr 23	We note confirmation that the niche of c.1470 on the column at the west end is now to be subsumed within the new meeting room but it does look very close to the new walling and it would be good to have further information on how exactly it would be impacted. It will need to be fully protected during the building works.	The niche will be protected during building work and walling will be designed around it.
HBP07	13 Apr 23	We commented on the high quality of the original tricerion vault within the tower. It would be good to know how this will, or will not, be seen through the new first floor screen.	It will still be seen, from the gallery.

From	Date	Comment	Response/ Action
HBP08	13 Apr 23	We commented before on the treatment of the A.K.Nicholson Hacker window as part of the plans for the new western gallery. Might it be spelt out further how this is to be impacted	In Section 9.1 of the Statement of Need
HBP09	13 Apr 23	The single greatest point of contention remains the fate of the 1887 chancel screen. We must be impressed by the strength of feeling advanced on liturgical grounds and we fully accept, as we always have done, that its presence is felt to be at odds with the present churchmanship (although I do wonder why a principal role of the screen, the prominent and lofty display of a crucifix, so fundamental to all Christians, can cause disquiet and why the retention of all of the present chancel and the removal of the screen alone can be said to free up the medieval interior, even if that were accepted as a legitimate goal). And we really do appreciate the extent of the argument as laid down so exhaustively in Annexe 3. However we do find it hard to accept that the practical arguments for removal really are overwhelming; a) Does the screen really affect the acoustic? How is that proven? The screen is so open in its tracery that it is not so much a barrier more a filter b) There are many examples, particularly in London DAC, of projector screens being hung from the top of a chancel screen and rolled up at the end of use. The fitting would need to be carefully handled but such a position might be less prominent when rolled up than a unit more visibly suspended within a chancel arch 3 c) I don't understand how the removal of the screen alone will have any appreciable effect on capacity or indeed critical sightlines. Anybody sitting in the aisles is going to be denied a straight on view of the altar far more than anybody sitting in the nave and gazing at the altar through the screen. This is just an inescapable effect of a medieval footprint (and the housing of 200 people for the occasional largescale event in a building intended for less )	<p>We make a case for the relocation of the screen in Annex 3 to the Statement of Need. This is based on strong liturgical, architectural and practical needs.</p> <p>More formal services of Holy Communion still takes place in the Sanctuary. However, one of the difficulties is that the communion rail is not accessible, and some parishioners have difficulty with the steps leading into the chancel.</p> <p>The adverse effect on acoustics was raised by our Director of Music who has spent many hours with various choirs on both sides of and split between the screen.</p> <p>Sir John Betjeman commented that<sup>1</sup>: <i>'LECHLADE St Lawrence Modestly placed in the corner of the market place of this pleasant town, St Lawrence's is one of the great Perpendicular 'wool' churches, all 15<sup>th</sup> and 16<sup>th</sup> century with a splendid chancel roof, fine bosses and corbels, angels, a blacksmith, wrestlers and evangelists' symbols.'</i></p> <p><i>The 19<sup>th</sup> century screen detracts from the spacious interior.</i></p> <p><i>Simon Jenkins commented that: 'a heavy Victorian screen shields the chancel and thus obstructs the view of the East window'.</i></p>

<sup>1</sup> Betjeman's Best British Churches, Sir John Betjeman and Richard Surman. reprinted 2011.

From	Date	Comment	Response/ Action
			<p><i>There was strong support from the initial consultation for relocating the screen which would provide a clear aspect to the chancel and sanctuary.<sup>2</sup></i></p> <p>We had proposed that the screen be placed at the rear of the gallery where the design and workmanship can be seen. While the DAC commented that this would de-contextualise the screen, we still believe this is a compromise to be made.</p> <p>We have compromised by retaining the parclose screens which comprise the same design as the choir screen as a record of Waller and Son's work,</p> <p>There are clearly differences of opinion on the significance and utility of the screen between those who regularly worship in the church and those who regard this as an item of architectural and historic value.</p> <p>We are content to accept SPAB's suggestion, the spirit of compromise, to discuss and explore with the Victorian Society and Historic England whether there are acceptable minor modifications that might be made to the screen to reduce the heaviness noted by Simon Jenkins.</p>

<sup>2</sup> England's Thousand Best Churches, Simon Jenkins 1999



**C: Historic England - visited St Lawrence church on 22<sup>nd</sup> October 2021**

From	Date	Comment	Response/ Action
HE1	19 Apr 23	<p><b>Summary</b></p> <p>We are very concerned over the proposed removal of the majority of the historic fabric that formed part of the 1880's re-ordering by F Waller and elements of the proposed changes to the church interior. This will result in the loss of a very significance phase of works, which very much defines much of the special interest and character of the church interior, as we experience it today.</p> <p>This, together with some of the new design elements will result in a high degree of harm, without clear or convincing justification, as required by para 200 of the National Planning Policy Framework (NPPF).</p> <p>As it stands, we object to the proposals for St Lawrence and advice that the DAC encourages the PCC to re-visit and develop alternative options that may reduce the overall harm.</p>	<p>This is the same comment raised in the informal comments dated November 2021.</p> <p>We made significant compromises to the earlier 2021 proposals following comments from the CBC and others. These changes include the retention of the chancel, choir furniture, tiled floor and parclose screens. In effect the chancel area is left just as Waller and Son designed it. These compromises are referred to in section 7.2 of the Statement of Need.</p> <p>HE fails to recognise these changes we have made, or only in passing, which is disappointing.</p> <p>The response does not recognise the benefits of removing the unsightly 1960's large radiators and blowers, which also contain asbestos bearing materials, from the nave and aisles and associated cables and wiring, restoring the walls to the original clear design.</p>
HE2	19 Apr 23	<p><b>Significance of Designated Heritage Assets</b></p> <p>The Statement of Significance (version 10), as with previous versions, provides a comprehensive account and assessment of the significance of the Church, mostly meeting the requirements of para 196 of the NPPF. We have previously requested further justification to be given to the concluded levels of significance ascribed to certain elements of the church, as there is no mention or description of the heritage values associated with individual or collective elements. However, we note that the statement has now concluded that the Waller re-ordering is of high heritage significance. The Statement of Significance still requires further work, particularly where elements of the proposed works are considered</p>	<p>We consider that the Statement of Significance prepared by our archaeologist Mr Chiz Harward BA MCIfA (Archaeologist to Winchester Cathedral and previously to Gloucester Cathedral) is comprehensive and robust.</p> <p>Our archaeologist commented that the reference should be para 194 of the NPPF which states</p> <p><i>'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by</i></p>

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		<p>harmful and the impacts need to be properly understood.</p> <p>Ascribing significance to various elements of the Church fabric needs supporting evidence and assessment, so simply ascribing a degree of significance to the pews, for example, but without reason or reference to their various heritage values, is insufficient, particularly when substantial amounts of loss is proposed. While much research has obviously gone into the Statement of Significance (SOS), it should be augmented further by a discussion of the heritage values, as outlined in Conservation Principles 2009. As it stands, the Statement of Significance does not fully meet the statutory requirements.</p> <p>.</p>	<p><i>their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.</i></p> <p>Mr Chiz Harward commented that the Principles of Conservation outline a whole range of different aspects of Significance, but it is standard practice to not go into huge depth on every aspect and item as it creates a bloated and unreadable document.</p>
HE3	19 Apr 23	<p><b>Impact of the Proposed Development – Removal of Pews</b></p> <p>The proposals include the removal of much of the Waller phase of works, including the bench pews. The overall/collective Waller phase is ascribed as being of high significance in the Statement of Significance. While the bench pews are relatively understated in their design, they contribute very positively to the ensemble of 19th century fittings. The SOS concludes that the impact of their removal would be <i>'significant on the internal appearance of the church and on the tangible and evidential aspects of the 1882 restoration.'</i></p> <p>We have indicated through informal advice that there may scope to remove a proportion of the pews towards the rear of the nave and aisles and that the PCC should consider making some of the pews more mobile with the adaption with casters or similar, so that they can be retained, but allow a more flexible arrangement of seating. The Church already uses the pews in a variety of arrangements, and making these mobile will greatly assist their flexibility.</p> <p>The revised SOS purports that the pews are too heavy to move with added</p>	<p>The Statement of Need Section 8.1, which was updated following initial comments from HE, provides clear and convincing reasons for removal of the pews.</p> <p>The need for clear space and flexibility of use in the Statement of Need is shown in the proposed typical seating and table layouts shown in drawings 1922-28 and 1922-29 by Chedburn Codd. The current and future use of the church is set out in Annex 4 of the Statement of Need.</p> <p>The retention of any pews in the nave and aisles limits the available space for alternative worship arrangements. Our compromise in retaining the chancel in its current layout places greater pressure on available space in the nave. In mitigation we plan to retain some shortened pews in the chancel.</p> <p>The Judgement at Bath Abbey, which is relevant to St Lawrence, included:</p>

From	Date	Comment	Response/ Action
		<p>castors. However, there are many examples where this approach has been successful (for example Terrington, St Clement's <a href="https://www.hrballiance.org.uk/news/roving-reporter/keep-on-moving">https://www.hrballiance.org.uk/news/roving-reporter/keep-on-moving</a>).</p> <p>We suggest that a single pew is adapted as a prototype to see how effective this could be in the day-to-day life of the Church.</p> <p>We are not persuaded that the justification discussed for the total loss of pews is clear and convincing and therefore does not fulfil the requirements of para 200 of the NPPF. Also, the option of retaining a proportion of the pews to allow a more flexible space towards the rear of the nave does not appear to have been considered, further to our previous advice. Therefore, there is no cogent case for the complete loss of pews, which would result in unjustified harm to the overall significance of the Grade I Church.</p>	<p><i>The [...] seating plan was the product of its age, when worship was essentially a static activity, and seating space was at a premium so that large congregations could be accommodated. The mediaeval use of the nave for secular purposes had long been abandoned. By contrast, flexible styles of worship involving smaller congregations have now become widespread, and the revived use of churches for appropriate secular purposes is recognised as both a service to the community and as an aid to the mission of the church. The Petitioners' aspirations to meet these objectives are appropriate and realistic.<sup>3</sup></i></p> <p>We explain in the Statement of Need why placing pews on castors is impractical to meet the flexible use of the space. We have looked at alternative ways of moving pews with our ageing volunteers, but this places risks on lifting, damage to the floor from point loading moving, and the human factors of ensuring that castors are locked in place; there is a risk of human error with potential adverse consequences. In any event, we explain in Section 8.1 significant storage space is taken up in the aisles and nave even when pews are moved. With 42 pews currently in the church we would need an area of 60m<sup>2</sup> just to store them. This would take up the whole of the available area in the north and south aisles and some space in the nave. While chairs can be stacked, pews cannot. Therefore, retaining pews, even on castors, does not meet the need for open flexible areas for use by the church.</p> <p>Any option to store pews off site would incur significant costs in both transport and storage when there is a challenge on annual budgets.</p>

<sup>3</sup> Consistory Court Judgement, St Peter and St Paul, Bath Abbey, Hon Timothy Briden, December 2017

From	Date	Comment	Response/ Action
HE4	19 Apr 23	<p><b>Impact of the Proposed Development – Removal of choir screen</b></p> <p>The proposals include the removal of the choir screen, designed and added by Waller (although we understand this was later in 1887). The submitted Statement of Need (Annex 3) suggests that it is of medium significance on account of its later addition and that it is not mentioned in the list description, whereby other fittings are. List descriptions are not exhaustive in their content and many descriptions do not include all aspects or features that may contribute to heritage significance. We are not therefore persuaded by this argument. It is also purported that the screen was added as a memorial, which would suggest that its significance is contributed by its communal/historical heritage value. Due to this and its high aesthetic and historic value, as part of the substantial changes to the Church in the late 19<sup>th</sup> century, we consider the screen to contribute highly to the overall significance.</p> <p>Previous proposals included its relocation to the rear of the proposed balcony, but we now understand that this is no longer a proposed option and that alternatives have been suggested, but seemingly discounted. The proposed plans do not include a relocated position for the screen. We object to its removal and being consistent with our previous advice, an alternative location is likely to be non-contextual.</p> <p>The submitted supporting statement gives a number of reasons and justification for its removal, including greater visibility of the east end, visual foreshortening of the nave and a more flexible choir. While the medieval Church may have had unencumbered sightlines without the screen, the addition of the Waller’s screen is part of the narrative of the Church, a key decorative fitting of the Victorian restoration and therefore its significance. Its design does not block views of the Sanctuary and we are not persuaded by the argument provided. As para 199 of the NPPF</p>	<p>We make a case for the relocation of the screen in Annex 3 to the Statement of Need. This is based on strong liturgical, architectural and practical needs.</p> <p>More formal services of Holy Communion still takes place in the Sanctuary. However, one of the difficulties is that the communion rail is not accessible, and some parishioners have difficulty with the steps leading into the chancel.</p> <p>The adverse effect on acoustics was raised by our Director of Music who has spent many hours with various choirs on both sides of and split between the screen.</p> <p>Sir John Betjeman commented that<sup>4</sup>: <i>‘LECHLADE St Lawrence Modestly placed in the corner of the market place of this pleasant town, ‘St Lawrence’s is one of the great Perpendicular ‘wool’ churches, all 15<sup>th</sup> and 16<sup>th</sup> century with a splendid chancel roof, fine bosses and corbels, angels, a blacksmith, wrestlers and evangelists’ symbols.’</i></p> <p><i>The 19<sup>th</sup> century screen detracts from the spacious interior.</i></p> <p><i>Simon Jenkins commented that: ‘a heavy Victorian screen shields the chancel and thus obstructs the view of the East window’.</i><sup>5</sup></p>

<sup>4</sup> Betjeman’s Best British Churches, Sir John Betjeman and Richard Surman. reprinted 2011.

<sup>5</sup> England’s Thousand Best Churches, Simon Jenkins 1999

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		<p>requires 'great weight' to be given to the conservation of heritage assets and that the greater the significance, the greater the weight shall be, the justification for the relocation of the screen needs to be clear and convincing (para 200), even more so given that the Church is Grade I.</p> <p>There is no cogent case for its removal, as its position is intrinsic to the hierarchy of space.</p>	<p>There was strong support from the initial consultation for relocating the screen which would provide a clear aspect to the chancel and sanctuary.</p> <p>We had proposed that the screen be placed at the rear of the gallery where the design and workmanship can be seen. While the DAC commented that this would de-contextualise the screen, we still believe this is a compromise to be made.</p> <p>We have compromised by retaining the parclose screens which comprise the same design as the choir screen as a record of Waller and Son's work.</p> <p>There are clearly differences of opinion on the significance and utility of the screen between those who regularly worship in the church and those who regard this as an item of architectural and historic value.</p> <p>We are content to accept SPAB's suggestion (SP3), in the spirit of compromise, to discuss and explore with the Victorian Society and Historic England whether there are acceptable minor modifications that might be made to the screen to reduce the heaviness noted by Simon Jenkins.</p>
HE5	19 Apr 23	<p><b>Impact of the Proposed Development – Alterations to the floor</b></p> <p>The floor is to be raised by approx. 250mm over the existing floor tiles and the 19th century tiled floor replaced with under-floor heating and a polished limestone finish. The SOS concludes that Waller's floor is of low to moderate heritage significance, but without any evidence to support this. However, Part 2 of the SOS regards the proposed works here to be of high impact, which tends to conflict with the purported significance.</p>	<p>The Statement of Need Section 8.1, which was updated following initial comments from HE, provides clear and convincing reasons for construction of a new floor.</p> <p>The need for raising the floor comes from the following three needs: Access for all abilities, effective distributed heating and avoid unsightly pipe runs and cabling.</p>

From	Date	Comment	Response/ Action
		<p>We acknowledge that the choir stalls and flooring of the chancel area are now to be retained.</p> <p>We have expressed concerns over the loss of the Victorian floor on a number of levels. While the proposals would retain the existing fabric in-situ, we do not agree that this would be reversible, given that that the construction of a new floor and associated 250mm of material, including stone, would no doubt damage the tiles, making them unusable in the future. Furthermore, ledger stones will be covered, which could result in damage to fabric, legibility of inscriptions and inevitably they would not be visible within the Church.</p> <p>We understand that Waller reduced the floor level in 1882 by approximately 150mm in order to construct the limecrete floor (and in doing so, gave instruction for the careful relocation of burials and ledger stones). As we have advised previously, it is not entirely clear how the historic floor levels have changed during the life of the Church. This is particularly confused by the worn lower step into the church from the south porch, where the door has only recently been opened after being fixed shut for a significant amount of time. The worn step would tend to suggest that the floor was lower (perhaps similar to the existing level) for a much longer period of time. The application does not appear to have addressed this point, which we raised as part of our pre-application advice.</p> <p>The architectural mouldings on some (not all) of the column based are such that they indicate a previous lower floor level, although this view based on the aesthetics of the masonry and worn south porch step and not backed up by recorded evidence. It may very have been the case that the earlier 19th century phase of works raised the floor level from the previous and therefore Waller returned this to the former.</p>	<p>The proposals provide an integrated solution to meet this need within the constraints of the building.</p> <p>The main constraint is the existing concrete floor. Coring showed this is 5 to 6 inches thick hard concrete. We do not wish to excavate and pipe and cable trenches in the floor as this will weaken the structure and raise possible archaeological issues.</p> <p>The second constraint is the floor level at the chancel to achieve level access for all abilities. The porch threshold level is some 250mm above the existing floor but similar to the chancel floor.</p> <p>We show information in the Statement of Need that the floor was lowered by up to 250mm with the original intention to build up the level using timber supports and boarding to support the pews. During construction the 'Vestry' decided on a new design with pews located directly on clay tiles at a lower level. This lower floor is also confirmed by the unfinished stonework to the lower columns.</p> <p>The integral solution to raise the floor meets the need for level access for all abilities, include insulation and underfloor heating without disturbing the existing floor and provides the ability to route pipework and extensive cabling (required for new and future technologies) without harm to the fabric, particularly walls and columns.</p>

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		<p>While the existing tiled floor is indeed a later addition, it contributes considerably to the aesthetics of the Victorian phase and its removal would have a marked impact. Its loss would probably result in harm and that loss would need clear and convincing justification. We have previously advised that the PCC considers alternative options that retain the existing floor but incorporating measures to improve level access (through an access audit) and alternative means to improve or replace the heating of the Church.</p> <p>With regard to the proposed specification for the new floor finish, this would directly counter the character of the existing Church interior and would not restore the appearance or character of the pre-Victorian floor,</p>	<p>The CBC document 'Easy Access to Church Buildings' states that<sup>6</sup> <i>We cannot say 'All Welcome' and leave some people to find that they can't access our building or our activities. We shouldn't use the language of being inclusive, welcoming and accessible if that ignores the limitations of that inclusion, accessibility, or welcome. To do otherwise leaves us open to challenges of dishonesty and hypocrisy'; and</i></p> <p><i>'A Church without disabled people is a disabled Church'.</i></p> <p>Some disabilities are not readily recognised.</p> <p>While we have agreed, as a compromise, to retain the chancel area to maintain the Waller and Son reordering, much of the floor in the nave and aisles has been replaced with quarry tiles over decades of use, as confirmed in the parish records. The Statement of Significance assesses the floor as low to medium significance. We do not consider loss of the tiled floor would result in harm.</p> <p>The proposed stone floor is similar to the floors installed in other churches such as St Lawrence Bourton on the Water, Holy Trinity Minchinhampton and St Phillip and St James at Leckhampton.</p> <p>The floor finish needs to be hard wearing with high strength, a design life of at least 100 years, easily cleaned, of light colour and have no demarcations to be compatible with the flexible use of the space.</p>

<sup>6</sup> Easy Access to Church Buildings, Church Buildings Council 2021

From	Date	Comment	Response/ Action
		from the samples made available in the Church.	
HE6	19 Apr 23	<p><b>Impact of the Proposed Development – Balcony [Gallery], and proposed meeting rooms, kitchen and w.c.</b></p> <p>While we previously advised that the reinstatement of a balcony at the west end of the Church may be acceptable in principle, the last iteration for which we expressed concerns would have significantly altered the rear of the nave and aisles, particularly with the glazed lobby across the north porch. The revised proposals have modified the floor plan and removed the glazed lobby, although the intrusion of the balcony structure and associated spaces below would still truncate the full length of the nave and side aisles, causing harm to the primary architectural space of the Church.</p> <p>The reinstatement of a balcony on the line of the former and keeping the perpendicular lines of the church interior would be the option of least harm, given that this would impose less into the volume of the church. However, we recognise that this option would limit space for a w.c and new access stair in the west end of the north aisle.</p> <p>We still believe there is a compromise to be had, whereby the line of balcony and flanking kitchen and lobby below is kept on the line on the first pier. This would omit the curved sections that extend awkwardly into the aisles and retain the perpendicular lines of the Church.</p> <p>In terms of the requirement for new meeting rooms, we understand that these would be relocated from Church Cottage. We previous advised that options for adapting this Grade II building should be considered in providing the facilities required by the church. The updated Statement of Need states that the PCC have sought advice from the local planning authority, based on re-ordering the ground floor to improvement accessibility. The advice from the Conservation Officer does not conclude</p>	<p>The proposals for the gallery can be found in Section 8 of the Statement of Need v18.</p> <p>Our conservation architects have considered design options in some detail, to include the disabled and standard toilets, stairs to the gallery and alternative kitchen layouts to make most effective use of the space. Sparce is limited and they concluded that marginally extending the balcony alignment to curve over the aisles, would provide sufficient space to include all requirements within the profile of the balcony, given the constraints of toilet sizes and stairs layout set out in the building regulations.</p> <p>The PCC has decided to raise funds for the reordering work through the sale of the Church Cottage.</p> <p>We explained in v16 of the Statement of Need (also included for ease of reference as an appendix to v18 of the Statement of Need) that advice from the diocese senior buildings officer was to include all facilities currently within the cottage within</p>



From	Date	Comment	Response/ Action
		<p>that consent would not be granted, only that clear and convincing justification would be required, where harm is identified, as required by para 200 of the NPPF. We are not therefore persuaded that the option of adaptations to Church Cottage, which may ultimately reduce the degree of harm within the Grade I Church, has been fully explored. Also, it would be useful to have copies of the proposed plans included in an appendix to the Statement of Need.</p> <p>The application includes a proposed structural specification for the balcony but does not fully describe the impacts of this on the fabric of the Grade I building or the potential impact of the footings that would be required to be constructed to support the new steel frame. There are likely to archaeological impacts, given that the floor would need to be excavated and this may reveal evidence of a former church. It is uncertain where the Saxon church may have been, but this together with later phases and burials would need to be considered when designing the structural elements of the balcony.</p> <p>The design of the balcony and solid partitions below do not positively respond to the character of the existing interior. The visualisations do not persuade us that the design approach adopts detailing of a quality and standard befitting the significance of the Church. Further design options should be prepared and tabled for discussion.</p>	<p>the church, with no external buildings (other than churchyard maintenance).</p> <p><i>Church Cottage is ultimately a residential property which is not well suited to being a fully accessible and multipurpose community space.</i></p> <p><i>It is unlikely that Listed Building Consent (LBC) would be given to modify the ground floor to such an extent as to make it fully accessible as this would harm the character of the listed building. It therefore seems of little value to redevelop the ground floor to create a more consistently level area when the access to it is already compromised.</i></p> <p>Geotechnical investigations are planned (under a proposed temporary faculty) for the foundations of the gallery. This will be considered in parallel with the geophysical survey carried out (report on faculty portal). We are aware of the need for an archaeological watching brief, as with other investigations we have carried out.</p> <p>Architects Chedburn Codd have developed designs for the west end and have considered layout options which optimise the use of the limited space. Further detailed design work is to be carried out and specifications prepared. This area is subject to detailed design and specification.</p>
HE7	19 Apr 23	<p><b>Impact of the Proposed Development – Installation of an air source heat pump.</b></p> <p>We have previously indicated our support of the principle of considering</p>	<p>Should be 2030...</p>

From	Date	Comment	Response/ Action
		<p>a more sustainable means of generating electricity for the Church and becoming net zero by 2020. The preferred option remains an air-source heat pump, which would require a large exchange unit against the side of the tower enclosed by metal acoustic fencing.</p> <p>We advised that as a ground-mounted heat pump unit would have an adverse impact upon the exterior of the church, either alternative sites should be considered or even an alternative means of micro-generation, such as roof-mounted photo-voltaics investigated as an option. We note that the PCC have since considered roof-mounted PV but have discounted this option on account of low power use in summer and cost efficiency. We advise the submission includes further information on what has been considered and why battery storage would not be an option. The impacts may well be similar or greater than the proposed air source heat pump, but better justification is needed for the preferred option.</p> <p>In terms of the impact of the air source heat pump option and best practice in term of adapting the historic building fabric advice can be found in our standard publication &lt;<a href="https://historicengland.org.uk/images-books/publications/eehb-heat-pumps">https://historicengland.org.uk/images-books/publications/eehb-heat-pumps</a>&gt; .</p> <p>The screened compound would have an adverse impact on the 15<sup>th</sup> century tower, a key architectural element of the church, and the need for acoustic screening would need to be properly justified. Is this required to shield noise from neighbouring properties or from the church interior?</p>	<p>We have closely followed the advice of the Church of England Environmental Programme which has provided excellent webinars and information on which to base our proposals. We have participated in CofE environmental webinars etc to ensure that we are abreast of current thinking and practice insofar as churches are concerned.</p> <p>We have also engaged two highly experienced building services consultants who have designed and installed heating systems in many listed churches and historic buildings.</p> <p>The comment on use of PV cells as a power source for heating the church is impractical as they will not meet the power demand even with battery storage. Battery storage is used for diurnal demand variations not seasonal. There are also limitations on size and weight.</p> <p>Our building services consultants have provided a detailed response in the document '<i>Response to observations from Historic England with regard to proposals for a replacement heating system</i>'.<sup>7</sup> This provides a clear and comprehensive response as to the need for and siting of the ASHP, why the use of solar power is impractical, and the options considered in siting the ASHP.</p> <p>The acoustic screen is a requirement to reduce noise levels to properties using established design principles.</p>

<sup>7</sup> Response to observations from Historic England with regard to proposals for a replacement heating system, EEP consulting engineers, May 2023

From	Date	Comment	Response/ Action
HE8	19 Apr 23	<p><b>Impact of the Proposed Development – Other proposals.</b></p> <p>It is proposed that the south door is to be repaired and altered to prevent draughts. This is a particularly historic survival (probably from the 15<sup>th</sup> century?) and a full specification will need to be submitted and agreed prior to any works taking place.</p> <p>The external works include the relocation of the metal-clad maintenance shed from the rear of Church Cottage to an alternative site within the church yard. While site A would result in minimal impact to the ground, on account that this is the base of the former oil tank, there will be visual impact on the setting of the Church. Given that the construction of the shed is incongruous to this setting, we advise that an alternative construction is considered.</p> <p>The proposed site plan includes a note proposing a new ‘escape’ route across the church yard to be constructed in reinforced grass or gravel. Further details and justification would be needed for this.</p> <p>The early 19<sup>th</sup> century gates into the north porch are to be removed and disposed of and new doors installed in association with new glazed doors into the north aisle. There is no clear or convincing justification for the loss of fabric, and we advise that the gates are retained.</p>	<p>The door was recently reopened by an experienced carpenter recommended by the DAC. A detailed specification will be prepared, in consultation with him.</p> <p>The site of the new timber maintenance sheds has changed following an assessment of options by our architect. The proposals are shown in the Statement of Need v18 and on the planning application Design and Access Statement and drawings which are on the faculty portal.</p> <p>There is a building regulation requirement for a designed alternative means of exit where we propose to use the south door. Details of the path are provided on the planning drawings and will be specified at design stage 4.</p> <p>Section 8.5 of the Statement of Need provides clear and convincing evidence for the replacement of the existing gates. The replacement doors are carefully designed to blend into the conservation area, particularly adjacent to the recently completed footpath.</p>

From	Date	Comment	Response/ Action
			<p>The existing palisade gates are assessed as low to moderate significance in the Statement of Significance.</p>  <p>The sharp iron spikes on the non-original timber gates to the north porch imply a 'keep out' to the community and are most unwelcoming when we are looking to attract new and potential members of the congregation.</p> <p>The 4 inch (100mm) pointed iron spikes present a hazard to any unauthorised person trying to get in.</p> <p>The Historic Buildings and Places (HBP2e above) commented that:  <i>We still must regret the loss of the 1828 gates in the north chapel but in light of the acceptability of the design for the door in their stead we can now withdraw any formal concerns. We hope nevertheless that the gates will be sold into the architectural salvage market and will not be destroyed.</i></p>

From	Date	Comment	Response/ Action
			We agree with the Historic Buildings and Places society.
HE9	19 Apr 23	<p><b>Planning Legislation &amp; Policy Context</b></p> <p>Central to our consultation advice is the requirement of the Planning (Listed Buildings and Conservation Areas) Act 1990 in Section 66(1) for the local authority to “have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses”. Section 72 of the act refers to the council’s need to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area in the exercise of their duties.</p> <p>The significance of a heritage asset can be harmed or lost through alteration or destruction of the asset or development within its setting. As heritage assets are irreplaceable, any harm (whether substantial or less than substantial) is to be given great weight, and any harm to, or loss of, the significance of a designated heritage asset (or site of equivalent significance) should require clear and convincing justification.</p> <p>The questions set out in the Duffield Judgement of 2012 provide a means of assessing proposals that affect the special character of a listed building. Broadly, the judgement establishes that where proposals entail harm to a church’s special architectural or historic interest, clear and convincing justification is required, and that parishes will need to demonstrate that the harm is outweighed by the resulting public benefit.</p> <p>The chancellor will therefore need to carefully consider whether the harm to the significance of the Grade I listed church is outweighed by resulting public benefit in their assessment of these proposals.</p>	<p>We consider that the Need for worship and mission of the Church within the community of Lechlade, as set out in the Statement of Need, far outweighs the likely harm to the building.</p> <p>Through the development of the proposals, we have taken into account comments from the statutory consultees and have made significant compromises on our original proposals such as deferring the reordering the chancel area and south chapel to reduce the harm to the church.</p> <p>HE fails to acknowledge the benefits of removing c1960’s heating system including unsightly radiators and blowers, restoring damage to the walls from extensive pipework and cabling in the aisles of this great perpendicular church. Even our former servicing firm was amazed at the sheer size of the radiators.</p> <p>The proposals bring into use the significant north porch which, over recent decades, has been locked closed and neglected. We can bring this remarkable structure back to life through regular use, for access, notices and a welcoming space, particularly with the recently relaid footpath outside.</p>
HE10	19 Apr 23	<p><b>Position</b></p>	

From	Date	Comment	Response/ Action
		<p>The cumulative impact of the loss of historic fabric and proposed additions and alterations would result in unjustified harm to the significance of the Grade I Church. We believe that the aspirations of the Church in the ways in which the building is used by the worshipping and local community can be delivered in a way that while being a compromise in some respects, could result in substantially less harm than the current proposals.</p> <p>By virtue of the extent of removal of historic fabric, which both Historic England and the PCC concur to be of high significance, and the quantum of visual change to the interior aesthetics and character, we strongly object to the proposals. We are not persuaded that there is clear and convincing justification for all aspects of the proposed re-ordering and strongly advise that further negotiations take place to re-visit alternative options that we believe could significantly reduce the harm.</p>	<p>Our church is growing. Post-covid, the number of people worshipping in our four services has grown steadily, and we continue to attract new worshippers to our church family, whether the ladies in retirement who recently came to faith and were confirmed, or the young families who have begun to worship with us over the last two years. We see this as fulfilling the diocesan LIFE vision, especially where it calls us to <i>'nurture everyday disciples'</i> and <i>'excite young people to explore and grow in faith.'</i><sup>8</sup> To continue doing this, we need a building that supports our current activities and gives greater scope for new ones. Annex 4 of the Statement of Need includes those worship and mission activities already taking place, and those to which we aspire, but which we cannot properly offer with our current buildings.</p> <p>Again, with reference to the LIFE vision, we cannot <i>'encourage new and courageous ways of worshipping...which connect with more people'</i> without a building that is fit for doing things in new ways.<sup>9</sup> A building without proper heating, toilets, accessibility, lighting, or audio-visual facilities cannot <i>'connect with more people'</i> in the mid-twenty-first century or beyond.</p>

<sup>8</sup> Diocese of Gloucester, 'Life Together' vision, <https://gloucester.anglican.org/about-us/our-vision/#:~:text=five%20spotlight%20commitments-,%20the%20spotlight%20now%20shining%20on%20these%20five%20LIFE%20vision,which%20connect%20with%20more%20people> accessed 23/05/23.

<sup>9</sup> 'Life Together' vision.

### D. Society for the Preservation of Ancient Buildings (SPAB) – no record of visiting St Lawrence

From	Date	Comment	Response/ Action
SP1	10 May 23	<p><b><u>Overview</u></b></p> <p>We remain convinced that the parish should be looking to retain Church Cottage and combine a more limited use of it, perhaps primarily to provide meeting rooms, with a similarly reduced and balancing set of proposals for the interior of the church. Consideration should be given to the formation of meeting room space on the ground floor, with the upper floor potentially being let to a small local business to generate regular income. The latest Statement of Need refers to discussions with Cotswold District Council about possible alterations that might be permitted to the interior of the Grade II listed cottage, but the record of these discussions seems to have been omitted from the Statement. Please could this record be made available to consultees.</p> <p>Regarding the proposed re-ordering works to the interior of the church, in our view the impact of the proposals for the nave and tower as they are now will be both serious and harmful.</p>	<p>In the Statement of Need section 11.6 we state that the Grade 2 Church Cottage is to be sold to raise funds for the reordering work.</p> <p>The feasibility assessment of the Church Cottage is detailed in Section 11 of the Statement of Need v16 on the faculty portal. We looked at two options for use but on the advice of the DAC buildings officer and comments from the CDC conservation officer the former asked to include all facilities currently in the cottage within the church.</p> <p>The suggestion to sub-let the first floor of the cottage is impractical for security and access reasons. Our church is run entirely by volunteers, and we are not in the business of property letting. The income is unlikely to cover the additional Council Tax we would have to pay; currently we pay no tax as this is church property.</p> <p>Our proposals have been carefully developed by our experienced conservation architect following feasibility and design stages where options have been evaluated. The feasibility study and design drawings by Chedburn Codd are on the faculty portal. These proposals seek to minimise any harm to the church.</p> <p>Following initial consultation with statutory consultees we have made significant compromises to address comments made including retaining much of the Waller and Son, mainly</p>

From	Date	Comment	Response/ Action
			the design of the chancel, and the proposed inner lobby has been deleted.
SP2	10 May 23	<p><b><u>Chancel</u></b></p> <p>While we are pleased that, for the time being, the parish will not pursue the proposals for the chancel, we note that this may be temporary. Once again, we urge the parish to adopt a more understanding approach to, and appreciation of, the quality of the Victorian work in this area, and the contribution it makes to the interior of this beautiful church, described as one of the great Gloucestershire ‘wool’ churches by Pevsner.</p>	<p>The original proposal for the chancel does not form part of this faculty application.</p> <p>Pevsner indeed refers to St Lawrence as ‘one of the great Gloucestershire ‘wool’ churches’ and provides a detailed description of the perpendicular church and the interior and only mentions in passing the Waller and Son reordering.</p>
SP3	10 May 23	<p><b><u>Chancel Screen</u></b></p> <p>We read in the Statement of Need that, as with many churches, Holy Communion now takes place at the east end of the nave, so that there is no longer a division, in its various aspects, between the clergy and the laity. This removes one of the parish's central arguments, perhaps their strongest, for dispensing with the screen.</p> <p>As the latest entry in "<i>The Buildings of England, Gloucestershire 1: The Cotswolds</i>" by David Verey and Alan Brooks makes clear, the detail of the screen is purposefully designed to imitate the surrounding historic window tracery. The design has been carefully considered and executed.</p> <p>In the spirit of compromise, it might be helpful to discuss and explore with the Victorian Society and Historic England whether there are acceptable minor modifications that might be made to the screen to</p>	<p>We make a case for the relocation of the screen in Annex 3 to the Statement of Need. This is based on strong liturgical, architectural and practical needs.</p> <p>More formal services of Holy Communion still takes place in the Sanctuary. However, one of the difficulties is that the communion rail is not accessible, and some parishioners have difficulty with the steps leading into the chancel.</p> <p>The adverse effect on acoustics was raised by our Director of Music who has spent many hours with various choirs on both sides of and split between the screen.</p>



From	Date	Comment	Response/ Action
		<p>reduce the heaviness noted by Simon Jenkins. There is a point made in the Statement of Need that the screen has a negative effect on the acoustics in this part of the church, so this too might be lessened by carefully considered modifications.</p> <p>Whether the screen can be sensitively modified or not, in our opinion it is not something to be ejected from the church or simply stored as a piece of discarded furniture.</p>	<p>Sir John Betjeman commented that<sup>10</sup>: <i>'LECHLADE St Lawrence Modestly placed in the corner of the market place of this pleasant town, St Lawrence's is one of the great Perpendicular ' wool ' churches, all 15<sup>th</sup> and 16<sup>th</sup> century with a splendid chancel roof, fine bosses and corbels, angels, a blacksmith, wrestlers and evangelists' symbols.'</i></p> <p><i>The 19<sup>th</sup> century screen detracts from the spacious interior.</i><sup>11</sup></p> <p>Simon Jenkins commented that: <i>'a heavy Victorian screen shields the chancel and thus obstructs the view of the East window'. There was strong support from the initial consultation for relocating the screen which would provide a clear aspect to the chancel and sanctuary.</i><sup>12</sup></p> <p>We had proposed that the screen be placed at the rear of the gallery where the design and workmanship can be seen. While the DAC commented that this would de-contextualise the screen, we still believe this is a compromise to be made.</p> <p>We have compromised by retaining the parclose screens which comprise the same design as the choir screen as a record of Waller and Son's work,</p>

<sup>10</sup> Betjeman's Best British Churches, Sir John Betjeman and Richard Surman. reprinted 2011.

<sup>12</sup> England's Thousand Best Churches, Simon Jenkins 1999

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			<p>There are clearly differences of opinion on the significance and utility of the screen between those who regularly worship in the church and those who regard this as an item of architectural and historic value.</p> <p>We are content to accept SPAB's suggestion, in the spirit of compromise, to discuss and explore with the Victorian Society and Historic England whether there are acceptable minor modifications that might be made to the screen to reduce the heaviness noted by Simon Jenkin and Sir John Betjeman.</p>
SP4	10 May 23	<p><b><u>West Entrance, Floor, Heating, wholesale removal of Nave Pews</u></b></p> <p>We remain unconvinced of the needs to change the main entrance to the church from the west door, to raise the floor level, to remove the existing floor altogether, to introduce underfloor heating throughout the nave, and to remove all the nave pews. The level access that already exists stretching from the west door all the way to the chancel step, would be considered a great asset by many churches and we regret that the parish and its advisors do not see it in this light.</p>	<p>We explain the reasons for raising the floor and the options considered in Section 8.2 of the Statement of Need.</p> <p>The opening of the north porch, which has been closed for decades, provides an opportunity to use this valuable space and enable the community to see the historic structure and ceiling.</p> <p>This provides the opportunity to create meeting rooms at the west end of the church.</p>
SP5	10 May 23	<p><b>West Door Entrance</b></p> <p>The west door is the existing ceremonial entrance to the church. Entering the nave from this entrance allows visitors and parishioners to experience the full impact of the architecture of the interior - a view which cannot be replicated by entering through the north or south doors. If the path to the west door tends to flood during heavy rain, this can be relatively easily (and cheaply) remedied. We agree that the church may well need an additional emergency exit and we suggest that this might be through the</p>	<p>The west door was not always used as the main entrance until after the 1882 reordering and the construction of the bell ringing chamber in the early 20<sup>th</sup> century. The north porch was previously used as the main entrance, evidenced by plans of the 1828 reordering.</p> <p>Entering through the north door opens up views east and west.</p>

From	Date	Comment	Response/ Action
		south porch where the necessary intervention and disturbance to the historic fabric, including the floor, would be less than for the north porch.	
SP6	10 May 23	<p><b>Existing Floor</b></p> <p>We consider that the existing patterned tiles are important for the warmth, colour, texture, contrast and interest they give the interior. Especially without the pews, the proposed limestone floor would appear, cold, ungiving and its overwhelming blandness would detract from an appreciation of the architecture. Elsewhere in the country and under similar circumstances, we have seen and been impressed by a compromise whereby the patterned areas of tiling e.g. along the centre and at the east end of the nave are retained, repaired as may be necessary, and cherished. We commend such a solution to the parish.</p>	<p>We comment on the floor design in Annex 2 of the Statement of Need.</p> <p>In the consultations with the community there was a strong preference for a bright and open aspect for the church interior which would enhance the architecture and attract new members of the church.</p> <p>Our view has been influenced by visits to other churches which have recently completed reordering with new stone floors such as St Michael's Highworth, St Lawrence Bourton on the Water and St Philip and St James Leckhampton. We believe the architecture is enhanced, and attractive spaces have been created.</p> <p>To allow flexible use of the space such as shown in drawings 1922-28 and 1922-29, we are not designing any demarcation of the floor.</p>
SP7	10 May 23	<p><b>Pews</b></p> <p>While we defer to the Victorian Society on the interest and significance of the pews and whether there is scope to remove some, we suggest that again a compromise might be reached whereby blocks of pews, with the addition of locking castors, are retained in the nave as has been done successfully in many other parts of the country. We would suggest that advice is sought from an experienced carpenter and that possibly a trial is undertaken using one pew. The reference to the Guildford Chancellor's Judgment about combining banks of pews with chairs at Great Bookham</p>	<p>The Statement of Need Section 8.1, which was updated following initial comments from HE, provides clear and convincing reasons for removal of the pews.</p> <p>The need for clear space and flexibility of use in the Statement of Need is shown in the proposed typical seating and table layouts shown in drawings 1922-28 and 1922-29 by Chedburn Codd. The retention of any pews in the nave and aisles limits</p>

From	Date	Comment	Response/ Action
		<p>church, which is known to the SPAB, may not be quite so relevant to Lechlade church - at the former the nave and columns are squat, and that comparatively small church does not have the benefit of the soaring, uplifting Perpendicular architecture of Lechlade.</p>	<p>the available space for alternative worship arrangements. Our compromise in retaining the chancel in its current layout places greater pressure on available space in the nave. In mitigation we plan to retain some shortened pews in the chancel.</p> <p>The Judgement at Bath Abbey included: <i>The [...] seating plan was the product of its age, when worship was essentially a static activity, and seating space was at a premium so that large congregations could be accommodated. The mediaeval use of the nave for secular purposes had long been abandoned. By contrast, flexible styles of worship involving smaller congregations have now become widespread, and the revived use of churches for appropriate secular purposes is recognised as both a service to the community and as an aid to the mission of the church. The Petitioners' aspirations to meet these objectives are appropriate and realistic.</i><sup>13</sup></p> <p>We explain in the Statement of Need why placing pews on castors is impractical to meet the flexible use of the space. We have looked at alternative ways of moving pews with our ageing volunteers, but this places risks on lifting, damage to the floor from point loading moving, and the human factors of ensuring that castors are locked in place.</p> <p>In any event, we explain in Section 8.1 significant storage space is taken up in the aisles and nave even when pews are moved. With 42 pews currently in the church we would need an area of 60m<sup>2</sup> just to store them. This would take up the whole of the available area in the north and south aisles and some space in the nave. While chairs can be stacked,</p>

<sup>13</sup> Consistory Court Judgement, St Peter and St Paul, Bath Abbey, Hon Timothy Briden, December 2017

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			<p>pews cannot. Therefore, retaining pews, even on castors, does not meet the need for open flexible areas for use by the church.</p> <p>Any option to store pews off site would incur significant costs in both transport and storage when there is a challenge on annual budgets.</p>
SP8	10 May 23	<p><b>Heating</b></p> <p>We have nothing further to add to our previous comments and those from Historic England.</p>	<p>Please see our response to Historic England in row HE7 above.</p> <p>Our building services consultants have provided a detailed response in the document '<i>Response to observations from Historic England with regard to proposals for a replacement heating system</i>'.<sup>14</sup> This provides a clear and comprehensive response as to the need for and siting of the ASHP, why the use of solar power is impractical, and the options considered in siting the ASHP.</p>
SP9	10 May 23	<p><b>West End Proposals</b></p> <p>Converting the bases of church towers into meeting rooms is rarely successful as they can be rather cold and gloomy spaces, being almost wholly reliant on artificial light. As proposed for Lechlade, this meeting room would have three outside walls which may have residual dampness and the space is likely to be difficult to heat. As mentioned previously, the use of the ground floor of Church Cottage for meetings would meet the perceived need for meeting spaces, and would in our view, obviate the need for the proposed gallery extending right across the aisles.</p>	<p>There is no record of dampness in the tower.</p> <p>Our experienced building services consultants have designed heating, lighting and ventilation solutions for the meeting rooms.</p> <p>We are proposing to sell the cottage to raise funds for the reordering work.</p>

<sup>14</sup> Response to observations from Historic England with regard to proposals for a replacement heating system, EEP consulting engineers, May 2023

From	Date	Comment	Response/ Action
		The need for the gallery has still not been justified, especially as it will cause physical damage to the fabric of the building, including the floor. It may be that the domestic appearance of the screens proposed for the west end is intentional, but in our view, they are not in harmony with the architecture of this fine building. We suggest instead that the kitchen proposed for the southwest corner reads as a self-contained pod, and similarly the lavatory block to the northwest.	<p>We explain the need for the gallery in Section 9 of the Statement of Need.</p> <p>Our architects have developed designs for the west end and have considered layout options which optimise the use of the limited space. Further detailed design work is to be carried out and specifications prepared.</p>
SP10	10 May 23	<p><b>Summary</b></p> <p>In short, we do not consider that the current proposals, when taken together, respect or are worthy of this highly significant, historic church - one of the most important in the country. We consider that there may be compromises, as suggested above, which are far less damaging to the historic fabric and character of the church. In terms of considering the Duffield Question ‘would the proposals, if implemented, result in harm to the significance of the church as a building of special architectural or historic interest?’ the answer is yes, and we consider that the level of harm caused would be significant and un-justified. As there are clearly alternative options which would be less harmful, we retain our <b>objection</b> to the proposed scheme.</p>	<p>Our church is growing. Post-covid, the number of people worshipping in our four services has grown steadily, and we continue to attract new worshippers to our church family, whether the ladies in retirement who recently came to faith and were confirmed, or the young families who have begun to worship with us over the last two years. We see this as fulfilling the diocesan LIFE vision, especially where it calls us to ‘nurture everyday disciples’ and ‘excite young people to explore and grow in faith.’<sup>15</sup> To continue doing this, we need a building that supports our current activities and gives greater scope for new ones. Annex 4 of the Statement of Need includes those worship and mission activities already taking place, and those to which we aspire, but which we cannot properly offer with our current buildings.</p> <p>Again, with reference to the LIFE vision, we cannot ‘encourage new and courageous ways of worshipping...which connect with more people’ without a building that is fit for doing things in new ways.<sup>16</sup> A building without proper heating, toilets, accessibility, lighting, or audio-visual facilities</p>

<sup>15</sup> Diocese of Gloucester, ‘Life Together’ vision, <https://gloucester.anglican.org/about-us/our-vision/#:~:text=five%20spotlight%20commitments-,%20With%20the%20spotlight%20now%20shining%20on%20these%20five%20LIFE%20vision,which%20connect%20with%20more%20people> accessed 23/05/23.

<sup>16</sup> ‘Life Together’ vision.

From	Date	Comment	Response/ Action
			cannot 'connect with more people' in the mid-twenty-first century or beyond

## E. Victorian society – no record of visiting St Lawrence

From	Date	Comment	Response/ Action
VS1	23 May 23	<p><b>Screen</b></p> <p>The loss of the chancel screen was one of our primary sources of concern in the previous iteration of the scheme, and it is disappointing that the parish remains intent on disposing of it. Like HB&amp;P, we find it hard to believe that the screen would seriously affect acoustics, and no evidence is provided to support this assertion. More fundamentally, the decision now to retain the parclose screens to either side surely profoundly undermines most of, if not all, the practical arguments for removing the chancel screen. Furthermore, I'm afraid we don't accept that the screen did not form part of Waller's design: his original plan indicates a screen to the exact plan as the existing. Even if it was installed later, we can be fairly certain that it was planned from the outset, and that it therefore forms part of Waller's holistic plan for the interior.</p> <p>While we respect the parish's theological views on chancel screens, we do not consider that they amount to a compelling justification for the screen's removal. The Judgment for Warfield, St Michael the Arch Angel (in the Oxford diocese, issued in 2013) provides interesting context to this case. There the parish was similarly opposed on theological grounds to retaining its screen. Ultimately, the Chancellor in that case decided that such beliefs, while doubtlessly legitimate, merely represented one point of view, and did not in themselves compel or justify the removal of the screen, particularly in light of its historic and architectural interest.</p>	<p>We make a case for the relocation of the screen in Annex 3 to the Statement of Need. This is based on strong liturgical, architectural and practical needs.</p> <p>More formal services of Holy Communion still takes place in the Sanctuary. However, one of the difficulties is that the communion rail is not accessible, and some parishioners have difficulty with the steps leading into the chancel.</p> <p>The adverse effect on acoustics was raised by our Director of Music who has spent many hours with various choirs on both sides of and split between the screen.</p> <p>Sir John Betjeman commented that<sup>17</sup>: <i>'LECHLADE St Lawrence Modestly placed in the corner of the market place of this pleasant town, St Lawrence's is one of the great Perpendicular ' wool ' churches, all 15<sup>th</sup> and 16<sup>th</sup> century with a splendid chancel roof, fine bosses and corbels, angels, a blacksmith, wrestlers and evangelists' symbols.'</i></p> <p><i>The 19<sup>th</sup> century screen detracts from the spacious interior.</i><sup>18</sup></p>

<sup>17</sup> Betjeman's Best British Churches, Sir John Betjeman and Richard Surman. reprinted 2011.



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		<p>On the basis of the information provided the removal of the screen cannot in our view be justified. We would formally oppose its loss and continue to urge that it is retained.</p> <p>We do though naturally welcome the retention of the parclose screens, which we note above, and the choir stalls.</p>	<p><i>Simon Jenkins commented that:</i> <i>'a heavy Victorian screen shields the chancel and thus obstructs the view of the East window'.</i> <i>There was strong support from the initial consultation for relocating the screen which would provide a clear aspect to the chancel and sanctuary.<sup>19</sup></i></p> <p>We had proposed that the screen be placed at the rear of the gallery where the design and workmanship can be seen. While the DAC commented that this would de-contextualise the screen, we still believe this is a compromise to be made.</p> <p>We have compromised by retaining the parclose screens which comprise the same design as the choir screen as a record of Waller and Son's work,</p> <p>There are clearly differences of opinion on the significance and utility of the screen between those who regularly worship in the church and those who regard this as an item of architectural and historic value.</p> <p>We are content to accept SPAB's suggestion, the spirit of compromise, to discuss and explore with the Victorian Society and Historic England whether there are acceptable minor modifications that might be made to the screen to reduce the heaviness noted by Simon Jenkins.</p>
VS2	23 May 23	<p><b>Floor</b> When we last wrote in this case, we requested evidence of the floor's poor condition. I cannot see that we have been presented with any such</p>	

<sup>19</sup> England's Thousand Best Churches, Simon Jenkins 1999

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		<p>evidence. On the basis of photographs the floor would appear to be in reasonable condition and has the added benefit (in the main body of the church) of being all on a single level, without pew platforms. We also remain sceptical, in the absence of compelling evidence, that the floor was lowered as part of Waller’s restoration of the building; and we reject the notion that the floor is in any way dark or unwelcoming.</p> <p>We wish to stress that Waller’s tiled floor was designed to complement and respond to the architecture of the building. It is no more the case that flexible or adaptable seating layouts would look out of place on the floor than they would look out of place in the building as a whole. We therefore reject the notion that the retention of the floor would undermine or count against the flexible use of the space, or adaptable seating arrangements, even in the event that the benches are removed. Indeed, if it is the case that the vast majority of the benches are removed, the retention of the historic floor becomes even more significant.</p>	<p>The Statement of Need Section 8.1, which was updated following initial comments from HE, provides clear and convincing reasons for construction of a new floor.</p> <p>The need for raising the floor comes from the following three needs: Access for all abilities, effective distributed heating and avoid unsightly pipe runs and cabling.</p> <p>The proposals provide an integrated solution to meet this need within the constraints of the building.</p> <p>The main constraint is the existing concrete floor. Coring showed this is 5 to 6 inches thick hard concrete. We do not wish to excavate and pipe and cable trenches in the floor as this will weaken the structure and possible archaeological issues.</p> <p>The second constraint is the floor level at the chancel to achieve level access for all abilities. The porch threshold level is some 250mm above the existing floor but similar to the chancel floor.</p> <p>We show information that the floor was lowered up to 250mm with the original intention to build up the level using timber supports and boarding to support the pews. During construction the ‘Vestry’ decided on a new design with pews located directly on clay tiles at a lower level. This lower floor is also confirmed by the unfinished stonework to the lower columns.</p> <p>The integral solution to raise the floor meets the need for level access for all abilities, include insultation and underfloor</p>

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			<p>heating without disturbing the existing floor and provides the ability to route pipework and extensive cabling (required for new and future technologies) without harm to the fabric, particularly walls and columns.</p> <p>The CBC document 'Easy Access to Church Buildings' states that<sup>20</sup> <i>We cannot say 'All Welcome' and leave some people to find that they can't access our building or our activities. We shouldn't use the language of being inclusive, welcoming and accessible if that ignores the limitations of that inclusion, accessibility, or welcome. To do otherwise leaves us open to challenges of dishonesty and hypocrisy'; and</i></p> <p><i>'A Church without disabled people is a disabled Church'.</i></p> <p>While we have agreed, as a compromise, to retain the chancel area to maintain the Waller and Son reordering, much of the floor in the nave and aisles has been replaced with quarry tiles over decades of use, as confirmed in the parish records. The Statement of Significance assesses the floor as low to medium significance. We do not consider loss of the tiled floor would result in harm.</p> <p>Our view has been influenced by visits to other churches which have recently completed reordering with new stone floors such as St Michael's Highworth, St Lawrence Bourton on the Water and St Philip and St James Leckhampton. We believe the architecture is enhanced, and attractive spaces have been created.</p>


<sup>20</sup> Easy Access to Church Buildings, Church Buildings Council 2021

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			The floor finish needs to be hard wearing with high strength, a design life of at least 100 years, easily cleaned, of light colour and no demarcations to be compatible with the flexible use of the space.
VS3	23 May 23	<p><b>Gallery</b></p> <p>As we stated previously, a western gallery may not be unacceptable in principle, but its design remains underwhelming and utilitarian, and there are certainly practical arguments that count against it: visibility from either end of it would be extremely poor; and the lack of a lift means that the gallery (and its seating (roughly about a fifth of the entire seating capacity)) and the proposed meeting room at first-floor level would not be accessible. It would also have a major impact on one's appreciation of the building's perpendicular architecture, which Waller's work revealed and celebrated (and in that sense we reject the notion that what is proposed would better reveal the building's medieval architecture). Indeed, a western gallery would undo much of Waller's endeavours in re-medievalising the interior, and to an extent restore the Georgian (or pre-Waller) arrangement, in the process undermining and concealing the building's impressive medieval structure at the west end.</p>	<p>The Chedburn Codd feasibility study (report on faculty portal) considered a lift to the gallery. This was discounted because of insufficient space. However, the facilities provided on the gallery duplicate those available on the ground floor.</p> <p>This area is subject to detailed design and specification. Chedburn Codd has presented options for the gallery design for review by the PCC. Details will be placed on the faculty portal.</p> <p>There is a difference of opinion here. The proposals are to minimise the impact of the gallery on the architecture at the west end. The gallery would allow the community to have a closer view the architecture. In the faculty application, we propose to move the stained-glass window in the south west corner to the south aisle to have a clearer view.</p>
VS4	23 May 23	<p><b>Environmental concerns</b></p> <p>In addition to all the concerns expressed previously, and noted above, we wish also to emphasise the environmental impact this scheme would have. 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. In the midst of a climate</p>	<p>We have taken a total carbon approach in that the savings in operational carbon from the air source heat pump system taken over its life far outweighs the embodied carbon from the construction work.</p> <p>The construction industry is taking several steps to reduce embodied carbon. In the design and construction, we shall</p>

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		emergency, and in the context of the Church of England's net zero commitment, this seems an old fashioned and extremely carbon-hungry scheme.	endeavour to reduce carbon emissions. This is consistent with our Eco church silver award requirements. The Church of England's net zero commitment relates to operational carbon.

**F. Georgian society – in response to the planning application – no record of visiting St Lawrence**

From	Date	Comment	Response/ Action
GE1	23 May 23	<p><b>Gates in the north porch</b></p> <p>We defer to Historic England and other amenity societies on the majority of these proposals but note that the application includes a plan to remove and dispose of the early nineteenth century gates into the north porch and to install new doors in their place. These porch gates, which date from the 1820s, have original ironwork/hinges, raised panels and ramped rails as can be seen in Fig. 10 of the applicant’s Design and Access Statement. To state simply, as the applicant does, that they are ‘non-original’ is to underplay their significance and the way in which successive phases of the church’s development actively contribute to its significance. These gates are attractive survivals of an important chapter in the history of St Lawrence: the late Georgian campaign of alterations which included the addition of the balconies and box pews later removed by Waller. Irrespective of the design of the replacement doors, no clear or convincing justification for the removal of these early nineteenth century porch gates has been provided.</p> <p>A clear expectation is expressed in the National Planning Policy Framework (2021) that applicants adequately explain the significance of heritage assets affected by proposals: “In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance” (paragraph 194). This application fails to explain the significance of the porch gates adequately; neither their intrinsic aesthetic value or their evidential value in terms of the history of the church’s development is acknowledged.</p> <p>We draw your attention to the “great weight” paragraph (199) of the NPPF: “When considering the impact of a proposed development on the</p>	<p>Section 8.5 of the Statement of Need provides clear and convincing evidence for the replacement of the existing gates. The replacement doors are carefully designed to blend into the conservation area, particularly adjacent to the recently completed footpath.</p> <p>The existing palisade gates are assessed as low to moderate significance in the Statement of Significance.</p> <p>The sharp iron spikes on the non-original timber gates to the north porch imply a 'keep out' to the community and are most unwelcoming when we are looking to attract new and potential members of the congregation.</p>

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		<p>significance of a designated heritage asset, great weight should be given to the asset’s conservation” and to paragraph 200 which states that “any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification”.</p> <p>We also take this opportunity to remind your authority that a Conservation Area is a designated heritage asset for the purposes of the NPPF and that under Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 local authorities have a duty to pay special attention to the desirability of preserving or enhancing the character or appearance of Conservation Areas. In our view the removal of the porch gates would cause a degree of harm to the significance of the historic churchyard and so to Lechlade Conservation Area.</p> <p>No clear or convincing justification for the removal of these early nineteenth century porch gates has been provided. We consider that their removal would cause a degree of harm to the Grade I listed building and to the Conservation Area. We strongly advise that they are retained in their present location.</p>	 <p>The 4 inch (100mm) pointed iron spikes present a hazard to any unauthorised person trying to get in.</p> <p>The Ancient Buildings Society (HBP2e above) commented that: <i>We still must regret the loss of the 1828 gates in the north chapel but in light of the acceptability of the design for the door in their stead we can now withdraw any formal concerns. We hope nevertheless that the gates will be sold into the architectural salvage market and will not be destroyed.</i></p>