

**Extension and alterations to
St Lawrence's church, Bovingdon**

This is to be read in conjunction with the Heritage Statement which gives more information about the history and significance of the church and its constituent elements.

1.0 Location

- 1.1 The church is located in an extensive churchyard, which is bounded to the south-east¹ by gardens to houses along Church Street. Some of these houses are locally-listed. Church Street then turns along the north-east boundary of the churchyard up to Church Lane on the north-west boundary. The south-west side of the churchyard comprises largely residential gardens. The north-west corner is close to Bovingdon Primary Academy.
- 1.2 A diagonal pedestrian route links the far south-west corner of the churchyard with Vicarage Lane which runs north-west up from Church Lane on the north-west boundary.. The church's hall, St Lawrence Hall, is on Vicarage Lane and is approx. 0.3 km from the west door of the church. Vicarage Lane is a single track lane, without pavements along much of the route to the Hall.
Refer to drawing 1248-202.
- 1.3 The church is in character area 2 of the Bovingdon Conservation Area.² It is one of the dominant features of character area 2. The other is Grade 2 listed Bury Farm set in land to the south-east.
- 1.4 The main entrance to the church itself is through the south porch and sometimes through the west door in the tower. The south porch is closest to the principal vehicular and pedestrian gates at the far southwest corner and the modern vicarage in Church Street.
- 1.5 There is a third way through from Church Street: a grassed gap between houses, which leads up to a gravelled area to the 'south' (liturgical) elevation of the church.
- 1.6 The commercial and public centre of Bovingdon is to the south-west. Part (but not all) of it has been included in the conservation area and defined as 'character area 1'.

¹ Geographical points will be used for describing the location. For the description of the scheme, liturgical orientation will be used; i.e 'east' for the chancel and the tower is at the 'west' end.

² Reference will be made in this document to points raised in the 'Bovingdon Conservation Area : Character Appraisal and Management Proposals' produced by the Conservation & Design team of Dacorum Borough Council written & researched by Dr James Moir. 2009.

1.7 The church is Grade 2* listed (refer to Heritage Statement)

2.0 Historical context.

2.1 There was a church on the site from around the mid 13th C: the tower was added c 1400. According to the Character Appraisal, the village developed as a series of farmsteads.

*'The Church and churchyard became a powerful focus, around which the settlement steadily developed and coalesced in the late medieval period.'*³

2.2 Over the centuries and specifically from the late 18th C through the 19thC the village developed with pubs, shops, inns and trades.

*'This transformation witnessed a major shift of focus for the village from a settlement clustered around the churchyard, to a thriving hamlet serving the local population and passing traffic on the Chipperfield Road.'*⁴

2.3 In the 19th C, with its growth, the village became a parish in its own right. One influence in the village was the patronage of Granville Ryder who, among other projects, rebuilt the church in 1845.⁵

2.4 In 1941 RAF Bovingdon was built and used by the RAF then the USAAF until closed in 1968 . An area of the site was then developed as HM Prison 'The Mount' in 1987. Remaining parts of the airfield are still used for a number of diverse civilian uses including filming. There are RAF squadron plaques in the church.

2.5 The village has continued to grow; according to the parish council website, it has a 'settlement population of 4611'.

2.6 As the village has grown, the focus has moved away from the church to such an extent that according to the vicar, some long-term Bovingdon residents have expressed surprise that the church exists: having only found it after some years in the village.

3.0 The site generally:

3.1 The grade 2* listed church is set in a large, 4.5 acre churchyard which, according to the church's website, is the largest open churchyard in the county⁶. It has over 1700 known interments but there are likely to be more. Anyone in the parish area can be buried in the churchyard.

3.2 The site slopes down to Church Street from Church Lane.

³ p6 'Bovingdon Conservation Area : Character Appraisal and Management Proposals' Dacorum Borough Council. 2009

⁴ p7 ibid

⁵ He also established the village school, offered land for the Memorial Hall, built the new Parsonage house, extended Bury Farm and there is a memorial to him in the High Street.

⁶ The Bovingdon Conservation Area: Character Appraisal and Management Proposals writes that the churchyard is the second largest – but this makes no reference whether the largest is open or closed.

3.3 The churchyard is either bounded by garden walls and fencing or fine brick and flint walls.

3.4 The main tarmaced pedestrian path from the south west corner up to the lych gate on the north-west boundary is lined with formally clipped Irish yews. The yews direct and focus the view on entering the site; from the southern-most end, they contrive to partly obscure the church.

4.0 Planning status and uses

4.1 The planning use of the church is D1. It is listed Grade 2*.

4.2 The church and churchyard are in the Bovingdon Conservation area.

4.3 The church and churchyard are bounded by housing on the south side.

4.4 Planning records dating back to 1993 show a number of applications for works to trees and applications for a mower shelter in the churchyard and floodlighting of the church and access path.

4.5 A scheme for a large, part two-storey church community facilities on the north side of the churchyard went for early pre-app advice to Dacorum which invited the Hertfordshire Architects' Advisory Panel under the aegis of BEAMS to comment. That scheme was much larger than the proposed scheme. Following that, a smaller, revised scheme, by others was drawn up. But it did not receive Diocesan support.

4.6 An earlier iteration of this current proposal went for pre-application advice ref: 4/02295/17/PRE. This application is an amended design, that also includes further evidential justification for the proposal.

4.7 The current design has cleared to apply to the Chancellor for a Faculty by the Diocesan Advisory Committee for St Albans Diocese. It has the support of the Diocese which understands the need.

5.0 Proposed siting

- 5.1 The proposal is to be sited on the north side of the church. The church is set in the middle of the churchyard.⁷
- 5.2 The siting of the scheme was given considerable care. It was chosen because it gave direct pedestrian access into the church but was also sited to be out-of-view from the key approach from the south-west corner. This corner is the main access from the village and the church car park is there.
- 5.3 Alternative locations for the community facilities were considered. These also included a north-aisle extension. This is indicated on drawing 1248 DOS 002. The difficulties with these alternative locations are set out in text on the drawing.
- 5.4 There is no easy place to site the proposed facilities. There is a basic requirement to link the new rooms to the church for the greater public benefit – as set out in detail in the Statement of Need.
- 5.5 There are limited locations to site a stand-alone facility: none is at all desirable. They either remove the parking or severely disrupt the view of the church, particularly from the main vehicular and pedestrian access from the village at the south-west corner of the churchyard from the village
- 5.6 Building a north side-aisle extension would have a far greater impact on the existing Grade 2* listed church than the proposal and destroy the light coming in to the north side of the church.
- 5.7 The proposal links to the church with a light touch. Little of the historic fabric is disturbed. This will be discussed in more detail when discussing the impact of the design on the heritage assets.
- 5.8 If there was a standalone building, it would be larger than the proposed building as some rooms are shared with the church. In addition, the church would still need a kitchen and new, extended WCs: the current WC is not internally linked to the church and is not accessible to disabled people as it is also too small and without step free access.
- 5.9 It must be noted that the parish had for decades wanted to build a much larger hall with other meeting rooms. The current scheme relies on the flexible space in the church itself to provide the space, but adds much needed ancillary space to support larger activities and services in the church together with meeting spaces for smaller groups.

⁷ See section 3.00 above

This allows the church to continue to be kept open for visitors during the day and allow the church family to worship together. See the Statement of Need generally.

6.0 Design

- 6.1 The building is designed to be fit for its purpose within imposed floor area constraints and current requirements and is subservient in height to the chancel roof.
- 6.2 The building is not a church but it is linked to the church. Therefore The choice of materials and design decisions reflect its place in the hierarchy of spaces.
- 6.3 The scheme provides a room which can be sub-divided into three spaces, a kitchen, two WCs and a church office.
- 6.4 The WCs, kitchen and office serve both the church and the meeting room. In particular, the church office is a vital link directly accessible between the two structures allowing oversight of both to improve security and welcome.
- 6.5 Refer to drawings 1248 PP 027, 028 and 029 which are just some of many iterations of potential use of the space.
- 6.6 It allows meetings and activities to take place at the church but also allows the church to remain open during the day for quiet reflection and access to heritage. The church has a policy of opening up during the day.
- 6.7 Following the pre-application submission, the bulk of the extension is further reduced both slightly in plan and more obviously in height and detail. Other alterations have been made to the use of materials. The overall philosophy is to take cues from the existing building but not to do a pastiche of Victorian gothic.
- 6.8 The bulk of the scheme is set off from the church, which therefore impacts less on the view of the North elevation and crucially, the north chancel window is un-interrupted, allowing proper light into the chancel. In addition, the north aisle windows are similarly open to light.
- 6.9 The projection beyond the line of the chancel was identified as an issue in pre-application discussions with secular consultees in terms of impact on liturgical hierarchy of form.
- 6.10 However, the ecclesiastical consultees, the Diocesan Advisory Committee (DAC) and the Church Building Council (CBC) were both less concerned. Both of which had visited the site.
- 6.11 The DAC had no issues with the projection. The CBC noted that as it would not be obvious from the main entrance into the churchyard

they were not concerned and noted that other on-site options were less satisfactory⁸

- 6.12 Following the pre-application consultation, the height of the extension has been reduced but keeping the pitch of the roof to match that of the chancel. It is subservient to the main church.
- 6.13 Considerable care was taken to match the pitch of the chancel roof following verbal comments⁹ from the Historic England representative at the pre-app site meeting.
- 6.14 The roof is tiled at a 43° pitch but then picks up a zinc perimeter: the pitch of which matches the pitch of the current former vestry roof. If the same steep pitch were used over the whole span, the roof would be too dominant.
- 6.15 The proposal for the Vestry roof is to remove the EPDM (single ply membrane) and replace it with standing seam zinc to tie it in with the new building.
- 6.16 We did not think a more 'churchy' form with parapets etc was appropriate: it would add to the bulk of the building and not reflect the forward-looking mission of the church. Nonetheless, the use of flint to delineate openings and express the east gable is crucial.
- 6.17 The building can be partitioned into sections to accommodate three groups e.g. of different ages of children. Refer to the Statement of Need. Pass doors on the operable walls allow transit between the rooms. All rooms have separate access to the churchyard.
- 6.18 The rather unloved existing corner between the Vestry and East end of the chancel is to be paved to allow outdoor refreshments and recreation.
- 6.19 The WCs and kitchen serve both community letting and the church use.
- 6.20 The walls are a mix of narrow, roman-style bricks (50mm as opposed to 65mm) with flint used to emphasise the openings. We felt that if the entire scheme were flint, it would have an adverse impact on the original church, being too 'same-y', yet could not have the decorative uplift of the church stone detailing. It would be something it is not: and that would be apparent and detract from the church.
- 6.21 Flint is used around the windows and the doors of the large room to give interest and emphasis.

⁸ They did want some reconsideration of the openings on the south elevation. Their comments were noted and revisions made within the constraints of the brief.

⁹ We have not seen any written report from Historic England following the visit.

- 6.18 For the east gable, flint is not only used around the east window but also decoratively & deliberately randomly. It is common to see both flint and brick used together in Hertfordshire churches (and elsewhere) particularly where there have been alterations. In this case it is a device to focus the eye on the centre: decorative camouflage.
- 6.12 The final key element is the link to the church. The sections below explain the rationale for the prominent arching around the window on the north elevation by the entrance door.
- 6.13 We were greatly concerned to keep some light coming through the eastern-most window of the north aisle for aesthetic and liturgical reasons.
- 6.15 The top quatrefoil is stained glass and shows Christ surrounded by children. This is liturgically relevant to the re-siting of the font on the axis of the new door.
- 6.16 Given the design & height of this window, it is not possible to bisect it with a flat roof covering the link and retain any significant sections of tracery. Our solution is to extend the tracery down to the top of the new door and then arch the link roof over the whole window.
- 6.17 This in turn allows a spectacular view into the churchyard when the new north door is opened and natural light still to reach the now-internal window.
- 6.18 The entrance to the extension is via the existing path along the north elevation. Currently it is terminated in a view of the door to the 20C WC extension. The view at the end of the path will now be more worthy.
- 6.19 The extension provides a kitchen, two WCs and a church office. The church office is a vital link between the two structures allowing oversight of both to improve security and welcome.

7.0 Reordering of the church

- 7.1 As the building is under Ecclesiastical exemption this has been the subject of applications to the Diocese and the current scheme has the support from the DAC.
- 7.2 It is proposed to remove the pews completely. We had proposed partial removal by way of compromise but the DAC expressed a preference for complete removal and encouraged us to develop the scheme accordingly.
- 7.3 The below are extracts from the Advice note issued by the DAC¹⁰

¹⁰ AC/19/41 Diocesan Advisory Committee 11 September 2019

'The visitors pointed out the removing the front pews, relocation the pew frontalswhile retaining the pews to the west would not be a straightforward solution, not would it provide the flexible space required.....'

.....The visitors considered the parish's original, more radical option to remove all the pews would provide the open space needed, and would be a more logical, sustainable and economic use to the existing footprint. It would offer the opportunity to bring the church back into focus for the village and engage local people in the heritage of the building. The pews were an intrusion into the architectural intentions of the light building with its open nave and arcades.'

- 7.4 The pews do not add to the overall setting of the interior superstructure. They are cramped. The aisle widths are very narrow. The design is derivative, the interchangeable poppy heads screwed on and for reasons discussed in more detail in Dr. Charles Tracy's report, they do not appear to be purpose-designed for the church.

'....The overall appearance is unnerving and quite unsuited to the architecture. It is inconceivable that the arrangement emanated from Talbot Bury's practice...'¹¹

- 7.5 Refer to the Heritage Statement para. 3.4 and Dr. Tracy's report sent with this application.

- 7.6 The current arrangement impedes use of the space generally – refer to the photos on page 9 of the Statement of Need.

- 7.6 The parish has a vision for the interior with the possibility of alternative forms of worship and community use using comfortable, accessible seating and access to comfortable and accessible ancillary spaces.

8.0 St Lawrence's Hall

- 8.1 The new facility replaces the community hall and kitchen currently available in St Lawrence Hall.

- 8.2 It is to be sold to help fund the new building.

- 8.3 It has a hazardous pedestrian link to the church; very limited parking and is a considerable distance from the church.

- 8.4 Refer to section 3.6 of the Statement of Need and sections 3.1, 3.2, 3.3, 3.4 and the Appendix more generally in the Statement of Need

¹¹ p4. 'St Lawrence, Bovingdon Hertfordshire. The Nave pews. A significance assessment' Charles Tracy B.A. Ph.D. FSA

9.0 Parking Provision

- 9.1 There is no change to the current provision. Note that the current provision already serves the church when full and the church will not let the rooms out for secular activities alongside Sunday services. The amount of seating in the church is not being increased.
- 9.2 Refer to the EAS transport statement accompanying this application for detailed analysis.
- 9.3 Bicycle parking racks will be provided.
- 9.4 In addition and for very large events, the open space in the churchyard to the south is already used for occasional temporary parking.

10.0 Alternative Venues

- 10.1 In accordance with pre-application advice we have considered alternative venues. One is continuing with St Lawrence's Hall and that is untenable for reasons discussed in section 8.00 above in also in the Statement of Need.
- 10.2 Bovingdon Primary Academy already relies on the church for whole-school events as its current facilities are not adequate. The scheme would also offer additional accommodation for these events and safer access to WCs – including a disabled-access WC. Currently a child has to be taken outside.
- 10.3 Appendix I attached to this statement goes into some detail about the suitability of using the Memorial Hall as an alternative venue. In particular, the LPA should note that para 1.8 argues that substantial weight should be given to pedestrian safety in travelling between venues.
- 10.4 The issue of pedestrian safety also arises with St Lawrence's Hall and the same parameters, lack of footway, lack of safe passing areas etc. apply:
- 10.5 The purpose of the new extension is to provide accessible communal facilities and facilitate interactive use of extension and church between stages of services (for example for children's services, weddings, christenings and wakes).
- 10.6 The extension is also designed to benefit the community allowing events such as fairs, harvest suppers, playgroups, concerts etc. with the churchyard being an added benefit. Used in conjunction with the church, it offers space for large, complex events that cannot be met elsewhere

- 10.7 Having to trail/hobble/ push a buggy or wheelchair for a door-to-door distance of around a third of a kilometre between venues is extraordinarily limiting for the church and of no benefit to the community.

9.0 Impact on the Heritage assets

This section to be read in conjunction with the Heritage Statement

“Heritage is a broad concept and includes the natural as well as the cultural environment. It encompasses landscapes, historic places, sites and built environments, as well as bio-diversity, collections, past and continuing cultural practices, knowledge and living experiences. It records and expresses the long processes of historic development, forming the essence of diverse national, regional, indigenous and local identities and is an integral part of modern life. It is a social dynamic reference point and positive instrument for growth and change. The particular heritage and collective memory of each locality or community is irreplaceable and an important foundation for development, both now and into the future.”¹²

- 9.1 The church is Grade 2* listed and falls into the category of ‘particularly important buildings of more than special interest’¹³.
- 9.2 Our assessment of heritage assets identifies not only the physical heritage assets but also the cultural and historical heritage assets of the church and its relationship to the village at large.
- 9.2 The proposed works remove some of the fabric of the church – the archaeological assets. Some of this fabric is already harmful to the setting of the church such as the existing modern metal flue and existing EDPM roof over the former Vestry. See para 4.3 of the Heritage Statement for more detail.
- 9.3 The 20C WC extension neither adds nor subtracts from the significance of the asset. The proposal removes this WC, which cannot be accessed without going outside the church and is wholly unsuitable for disabled access.
- 9.3 In order to create the link, the eastern-most window in the north side aisle is altered to create a new north door. This does remove some 19C flint under the window, stone dressings and mullions but no stained glass is removed.

¹² International Cultural Tourism Charter ICOMOS 2002

<https://historicengland.org.uk/advice/hpg/hpr-definitions/>

¹³ <https://historicengland.org.uk/advice/hpg/has/listed-buildings/>

The window is altered to a new form in stone over the new door. This is less-than-significant harm and is more than justified by the public benefit (of which more later) that the extension offers.

- 9.4 The extension generally has a light interface with the existing building and allows the form of the original church to still be appreciated. The proposed site is the least satisfactory corner of the existing building. Refer to the photo on Page 2 of the Heritage Statement.
- 9.5 The question is whether the extension harms the setting of the church as a whole. Is it less-than-substantial harm or substantial harm?
- 9.6 Following the pre-application process the bulk of the extension and impact of some architectural details have been reduced. The extension is subservient and does allow the form of the church to be appreciated from different angles – indeed it is not apparent at all from the main entrance into the site.
- 9.7 The design of the new extension results in the removal of the rather clumsy WC and flue. Refer to the photo on page 2 and para 4.3 both in the Heritage Assessment for context. In this instance it makes a positive contribution to the setting of the heritage asset.
- 9.7 In our view the proposed carefully-designed extension using appropriate and high quality materials cannot be put into the same category of 'harm' as a building built of inappropriate materials which does not respect the original building.
- 9.8 It is true that the current building does stand alone in the churchyard and therefore it can be argued that there is harm by any extension. In our view it at most 'less-than-substantial' harm to this particular asset due to the light impact on the archaeology; visibility of the existing architecture; the positive contribution in the removal of highly visible harmful elements of the existing buildings; the quality of design and materials arising out of a long study of the building and churchyard together with many reiterations of earlier schemes.
- 9.9 Even if the harm to the setting of the physical heritage asset is considered 'substantial', the harm is to be weighed against public benefits. These include the optimum viable use of the building (para 196 of the NPPF); access to heritage and public benefit.
- 9.10 The optimum viable use of the building is as a place of worship, which is also one of the assessed cultural assets ¹⁴
- 9.11 Churches need to adapt and upgrade in order to attract a congregation especially younger members and families in order to enable its sustainability of use. Patterns of worship and expectations of accessibility and comfort have changed and will continue to change. This church has to compete with growing numbers of converted

¹⁴ refer to section 4 and para 4.5 of the Heritage Assessment

industrial and office buildings, which now offer lively, youth-friendly, comfortable and warm church services.

- 9.12 The church relies on giving and legacies from church members and a lot of unpaid volunteer effort to maintain the fabric and meet running costs. If the church were to be redundant and there were no members, who would maintain the fabric of the building and churchyard?
- 9.13 The proposal will make a positive contribution to the future sustainability of this optimum viable use. Without it, the future is far more uncertain.
- 9.14 The proposal makes a positive contribution to the sustainability of this cultural heritage asset. Section 1 – the ‘High level summary’ in the Statement of Need summarises the issues that the church faces currently. Subsequent sections in the Statement of Need then demonstrate how the proposals will address the issues affecting the sustainability of the heritage asset.
- 9.15 The other cultural heritage asset is the eroding cultural asset of the church being a focus for village life.¹⁵
- 9.16 As the centre of gravity of the village moves further away from the church with the new proposed housing developments¹⁶, the proposal will contribute to rebalancing, sustaining and enhancing this important cultural heritage asset.
- 9.17 It will create a comfortable, welcoming and flexible complex, which can be for significant community use at all times of the year.
- 9.18 Access to heritage will be enhanced by the scheme. There will be better facilities for casual visitors and opportunity to go to get-togethers, coffee mornings, toddler groups, exercise classes, craft sessions etc. in the extension and to larger events across both church and extension. This can only increase the number of people accessing heritage beyond that of the existing congregation.
- 9.20 In maintaining the use of the building and by encouraging others to use it and care for it, funds can be generated towards the upkeep of the church in terms of repairs and renewals.¹⁷ This is another example of the public benefit that will arise out the proposal and will reduce risk to the heritage asset.
- 9.21 The proposal impacts on the heritage asset of churchyard and the setting of the conservation area.

¹⁵ refer to section 4 and paras 4.6 – 4.9 of the Heritage Assessment

¹⁶ c.f the Vicar's wry observation reported in para 2.6 of this document

¹⁷ the writer is the Inspecting Architect for the church and sees at close hand that this is an ongoing issue

- 9.22 DBC's assessment of the conservation area¹⁸ notes the churchyard as 'unexpectedly secretive' and that '...Despite its impressive bulk, even the Church tends to offer only snatched views from around its perimeter.'¹⁹
- 9.23 Therefore the extension cannot be necessarily seen as being particularly harmful - if at all - to the setting of the expanded conservation area as a whole.
- 9.24 it will have an impact within the churchyard and in particular as seen on the north and east sides of the churchyard. The north-east corner of the church is already somewhat compromised as stated earlier. It is a matter of opinion about the degree of harm that a well-designed building has on the setting of the churchyard.
- 9.25 There is great need for modern facilities to be in or near the church as opposed to being located 300m away from the west door of the church in an inadequate building with poor parking and dangerous pedestrian access. This is just not sustainable for the long-term protection of the main heritage assets. It has to be in the churchyard so an impact on the churchyard is inevitable.
- 9.26 The churchyard is 'open' and maintained by the church. The finances for this is from interment fees and contributions in terms of time and money by the parish community. There are substantial walls to maintain and trees and grounds to look after.
- 9.27 The parish actively initiates improvements to the churchyard including new paths, sculptures and seating.
- 9.28 If the church were to diminish in numbers and even close, this stewardship, at no cost to the village generally, would cease.
- 9.29 The parish needs to refresh and develop members and adjust its use. The new facilities will provide the catalyst for this.
- 9.30 In our view, the extension offers at worst 'less-than-substantial' harm to the setting of the churchyard and conservation area at large. Others might view it as causing 'substantial harm' to the setting of the church heritage asset although we do not take this view.
- 9.31 Whatever the degree of perceived harm, this is offset by the positive contributions to the cultural heritage assets; the public benefits noted above; the optimum viable use, increased opportunity for access to heritage and cementing the long-term sustainability of the church and churchyard.
- 9.32 Para 2.8 (c) of the NPPF notes that Sustainable Development includes protecting the historic environment. The heritage statement, the

¹⁸ P6 'Bovingdon Conservation Area: Character Appraisal & Management proposals'
Dacorum Borough Council

¹⁹ Refer to the Heritage Statement and para 1.5 in particular which references the conservation area appraisal

earlier sections of this statement and the points raised in the statement of need demonstrate that the proposed extension is necessary for the preservation of the heritage asset.

9.33 We note that paragraph 020 in the Planning Guidance: Conserving and Enhancing the Historic Environment notes the following:

'.....However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

Public benefits may include heritage benefits, such as:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting*
- reducing or removing risks to a heritage asset*
- securing the optimum viable use of a heritage asset in support of its long term conservation..'*

The points made above address all these items raised in the Planning Guidance.

9.34 The scheme at pre-application stage was assessed as causing 'substantial harm' to the setting of the heritage asset. The current scheme is reduced in bulk and with altered detail following the pre-application process. But even if the view is still that the proposal causes 'substantial harm' there are 'very special circumstances' which have been set down in detail above and backed up by evidential documentation in the Heritage Statement, the Statement of Needs and the Traffic Assessment and other attachments.

9.35 These 'very special circumstances' outweigh any perceived harm, 'less-than-substantial' or 'substantial' In weighing up the degree of harm the LPA should also factor in the enhanced benefit to the cultural assets as outlined above and the guidance in para 9.33 above.

9.36 There is recent precedent for extensions to significant ecclesiastical heritage assets in Hertfordshire. A substantial single-storey extension has been built as a visitor centre and shop in Sumpter Yard: one of the key access points into St Alban's Cathedral & Abbey Church (Grade 1 listed) across from the main city car parks. It is built across one of the most highly used doors into the cathedral, tight against the cathedral wall.

9.37 There is another recent precedent in the form of the Garden Museum extension to a listed redundant church just outside the walls of Lambeth Palace and completely on view from Lambeth Palace Road. The extensive extension is built right in front of the chancel and is modern in form and materials.

10.0 Disabled Access

10.01 The scheme incorporates resin-bound surfacing to the new extension.

10.02 There will be level access into the new extension

10.03 The existing church is to be reordered to make it accessible to almost all areas.

10.04 There is now a disabled WC where none existed before.

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