

ITEM NUMBER: 5a

21/03792/FUL	Single storey extension, associated alterations and external works to form a community hall	
Site Address:	St Lawrence Church, Church Street, Bovington, Hertfordshire, HP3 0HS	
Applicant/Agent:	Rev. C. Burch	WEAL
Case Officer:	Daniel Terry	
Parish/Ward:	Bovington Parish Council	Bovington/ Flaunden/ Chipperfield
Referral to Committee:	The application has been called-in by Councillor Anderson due to the officer recommendation being for approval	

1. RECOMMENDATION

- 1.1 That planning permission be **GRANTED**, subject to conditions.

2. SUMMARY

- 2.1 The proposal is acceptable in principle and accords with policy CS4 of the Core Strategy and saved policy 116 of the Dacorum Borough Local Plan.
- 2.2 The design, scale and appearance of the proposal are considered acceptable and accord with policies CS11 and CS12 of the Core Strategy. The proposed materials have been highlighted by the Design and Conservation Officer as a concern however this can be addressed via a planning condition.
- 2.3 The proposal would result in 'less than substantial harm' in NPPF terms and this harm would be outweighed by the public benefits of the scheme.
- 2.4 There are no concerns in relation to impacts on residential amenity, highway safety or parking provision and so the proposal accords with policy CS12 of the Core Strategy and the Council's Parking Standards SPD.

3. SITE DESCRIPTION

- 3.1 The application site comprises St Lawrence Church which is set within its own churchyard and surrounded by a brick wall. The church itself is grade II* listed and the site also falls entirely within the Bovington Conservation Area. The history of the church and the Conservation Area is set out within the submitted heritage statement as well as within the Bovington Conservation Area Character Appraisal.
- 3.2 To the east, the site adjoins the Metropolitan Green Belt but it is not itself within this landscape designation. To the north and west lies properties in Church Lane and Vicarage Lane, whilst to the south is a number of properties in Church Street, although mostly located to the southern side of that highway. Some distance to the east lies Bury Farm.
- 3.3 There is an existing footpath running approximately through the middle of the site linking Church Street to the south-west with Vicarage Lane to the north-east.

4. PROPOSAL

- 4.1 Full planning permission is sought for an extension to the church to provide a functional space to be used by the church and other external community groups. The submission sets

out that this space could be sub-divided into three smaller rooms or used as one much larger space. The extension would include toilets and a kitchen, the latter of which is being relocated to create a new office space.

- 4.2 Between the proposed extension and the chancel (the eastern end of the church), a new area of hardstanding is also proposed. There are no proposed changes to the access arrangements or parking provision.

5. PLANNING HISTORY

Planning Applications (If Any):

4/00382/17/TCA - Works to trees
Raise no objection - 29th March 2017

4/00653/14/TCA - Works to trees
Raise no objection - 12th May 2014

4/00789/13/TCA - Works to trees
Raise no objection - 11th July 2013

4/01995/11/TCA - Works to trees
Raise no objection - 12th December 2011

4/01733/09/TCA - Works to trees
Raise no objection - 25th November 2009

4/01183/09/TCA - Works to trees
Raise no objection - 21st August 2009

4/02120/06/TCA - Works to trees
Raise no objection - 24th October 2006

4/01022/04/TCA - Works to trees
Raise no objection - 8th June 2004

4/02027/03/TCA - Works to trees
Raise no objection - 23rd October 2003

4/00872/00/TCA - Work to trees
Raise no objection - 16th June 2000

4/01996/99/TCA - Works to six yew trees
Raise no objection - 20th December 1999

4/00909/99/FUL - Floodlighting of church and access path lighting
Granted - 10th August 1999

4/01454/93/FUL - Erection of mower shelter (temporary)
Refused - 6th December 1993

6. CONSTRAINTS

Area of Archaeological Significance: 48
CIL Zone: CIL2
Bovingdon Conservation Area
Former Land Use (Risk Zone):
Heathrow Safeguarding Zone: LHR Wind Turbine
Large Village: Bovingdon
Listed Building, Grade: II*,
Open Land: Open Land (designated under Policies 9 and 116 in the Plan)
Parish: Bovingdon CP
RAF Halton and Chenies Zone: Green (15.2m)
Residential Area (Town/Village): Residential Area in Town Village (Bovingdon)
Parking Standards: New Zone 3
EA Source Protection Zone: 3

7. REPRESENTATIONS

Consultation responses

7.1 These are reproduced in full at Appendix A.

Neighbour notification/site notice responses

7.2 These are reproduced in full at Appendix B.

8. PLANNING POLICIES

Main Documents:

National Planning Policy Framework (2021)
Dacorum Borough Core Strategy 2006-2031 (adopted September 2013)
Dacorum Borough Local Plan 1999-2011 (adopted April 2004)

Relevant Policies:

NP1 - Supporting Development
CS1 - Distribution of Development
CS4 - The Towns and Large Villages
CS8 - Sustainable Transport
CS11 - Quality of Neighbourhood Design
CS12 - Quality of Site Design
CS13 - Quality of the Public Realm
CS23 - Social Infrastructure
CS25 - Landscape Character
CS27 - Quality of the Historic Environment
CS29 - Sustainable Design and Construction
CS32 - Air, Soil and Water Quality

Policy 57 - Provision and Management of Parking (limited weight)
Policy 58 - Private Parking Provision (limited weight)
Policy 99 - Preservation of Trees, Hedgerows and Woodlands (limited weight)
Policy 100 - Tree and Woodland Planting (limited weight)
Policy 116 - Open Land (full weight)
Policy 118 - Important Archaeological Remains

Policy 119 - Development Affecting Listed Buildings (limited weight)

Policy 120 - Development in Conservation Areas (limited weight)

Supplementary Planning Guidance/Documents:

Bovingdon Conservation Area Character Appraisal (2009)

Accessibility Zones for the Application of Car Parking Standards (2020)

Roads in Hertfordshire, Highway Design Guide 3rd Edition (2011)

Site Layout and Planning for Daylight and Sunlight: A Guide to Good Practice (2011)

9. CONSIDERATIONS

Main Issues

9.1 The main issues to consider are:

- The policy and principle justification for the proposal;
- The quality of design and impact on visual amenity;
- The impact on designated heritage assets;
- The impact on residential amenity; and
- The impact on highway safety and car parking;
- Other material considerations.

Principle of Development

9.2 The application site comprises a large churchyard setting, which forms the eastern edge of the Bovingdon Settlement. The site is not within the Metropolitan Green Belt, although it does border this land designation to the eastern edge. Instead, the site is defined as being 'Open Land' within an existing large village.

9.3 Bovingdon as a whole is defined as a large village in the settlement hierarchy and policy CS4 of the Core Strategy states that development will be guided to the appropriate areas within settlements. Non-residential development for small-scale social, community, leisure and business purposes is encouraged, provided it is compatible with its surroundings. In 'Open Land' areas, the primary planning purpose is to maintain the generally open character. Development proposals will be assessed against relevant open land policies.

9.4 Further to the above, saved policy 116 of the Dacorum Borough Local Plan states that Open Land forming part of the urban structure will be protected from building and other inappropriate development by applying the general provisions of Policy 9 (not a saved policy). Ancillary buildings and works, additions, replacement and redevelopment of buildings and changes of use must satisfy the conditions below:

- (a) the location, scale and use of the new development must be well related to the character of existing development, its use and its open land setting;
- (b) the integrity and future of the wider area of open land in which the new development is set must not be compromised;
- (c) in addition, in the case of sites which accommodate existing uses regarded as inappropriate to an open land area, proposals must:

- (i) not have a significant adverse impact on the character and environment of the site or its open land setting; or
- (ii) result in overall environmental improvements to the site in relation to its open land setting.

Proposals to develop on other open land in towns and large villages will be assessed on the basis of the local contribution the land makes to leisure facilities, townscape, visual amenity, nature conservation and the general environment.

Measures to conserve and improve the attractiveness, variety and usefulness of all open land will be investigated, encouraged and promoted.

- 9.5 Policy CS23 of the Core Strategy states that social infrastructure providing services and facilities to the community will be encouraged. New infrastructure will be located to aid accessibility and design to allow for different activities. The dual use of new and existing facilities will be encouraged wherever possible. This policy further adds that existing social infrastructure will be protected unless appropriate alternative provision is made, or satisfactory evidence is provided to prove the facility is no longer viable. The re-use of a building for an alternative social community service or facility is preferred.
- 9.6 In this regard, the primary use of the church for providing services (particularly religious services) must remain as its key function and a change of use or dividing up of the building, whether in part or as a whole, would be considered inappropriate in this instance. The submission has set out how alternative options have been considered, such as dividing up the existing internal spaces, but this is accompanied by an explanation as to why this is not deemed appropriate. The LPA would concur that this is inappropriate in this instance, as any change of use or dividing up of the existing areas of the church may have significant implications in heritage terms and adversely affect the significance of this grade II* listed building.
- 9.7 The submission sets out that the proposed extension to the church would allow for a functional community space that can be used by residents of the parish as well as being used by the church. The proposal would therefore provide an important local facility for residents and the significant amount of local support for this application that has been received indicates that there is such a need for this facility. Moreover, the plans set out how this extension would benefit from movable internal walls so that this community space can be used as one large space or three smaller rooms, thus ensuring it is versatile and meets the needs of the community and local groups.
- 9.8 With regard to the latter points of policy CS23, the submission sets out that alternative facilities were considered, such as the continuing use of St Lawrence Hall some distance to the north along Vicarage Lane, or the Memorial Hall, located on High Street. In both of these cases, the submission makes reference to the inadequacy of public footpaths leading from the churchyard to these two sites and this is a recognised concern. More to the point however, the Memorial Hall is understood to be owned and operated by the Parish Council and therefore its use by the church would be somewhat restricted, potentially conflicting with other users of this local facility. St Lawrence Hall meanwhile appears to offer very little in terms of parking, and on-street parking is not readily available along this part of Vicarage Lane. The lack of public footpath, as mentioned, is also a concern, particularly where children may be expected to walk to this facility.
- 9.9 The above only provides a very brief summary of the reasoning for the proposals and therefore the submitted 'statement of need' and Design and Access Statement should be read in conjunction. For the purposes of this report and given the level of detail provided in the application, the LPA accepts that there is a demonstrable need for this facility, which would benefit not only the church itself, but the wider community and parish.

- 9.10 The proposal is therefore considered to be acceptable in principle and complies with policies CS4 and CS23 of the Core Strategy, as well as saved policy 116 of the Dacorum Borough Local Plan.

Quality of Design / Impact on Visual Amenity

- 9.11 Policies CS11 and CS12 of the Core Strategy state that development should respect the typical density intended in an area and enhance spaces between buildings and general character; preserve attractive streetscapes and enhance any positive linkages between character areas; avoid large areas dominated by car parking; retain important trees or replace them with suitable species if their loss is justified; plant trees and shrubs to help assimilate development and softly screen settlement edges; integrate with the streetscape character; and respect adjoining properties in terms of layout, security, site coverage, scale, height, bulk, materials and landscaping and amenity space.
- 9.12 A detailed assessment of the impacts in heritage terms is discussed in the below section of the report. Therefore with specific regard to the visual impacts, the proposed extension is considered a suitably subservient addition to the building and its overall scale and height would be considered to respect the existing building. The positioning of the extension means that it would be seen from Church Lane to the north, but largely only where it adjoins Vicarage Lane; along Church Lane to the east; and from parts of Church Street to the south, through the gap that exists between No.19 and No.21 Church Street. The extension would also be partially obscured from Church Street by the existing church. It does not appear however that the extension would be seen from High Street, some distance to the west/south-west, given the number of intervening buildings and the location of the extension towards the north-west of the existing church.
- 9.13 Importantly, it is acknowledged that the extension would be viewed in the context of the church and appropriate building materials could ensure that it harmonises with this designated heritage asset. In this regard, the proposal would largely involve a brickwork finish to the elevations but with areas of flintwork around the window and door openings. The roof would comprise of elements of zinc cladding along with tiles to the steeper parts of the pitched roof. It does not appear that the exact type, colour, texture, supplier etc. has been provided and so details of the materials would need to be secured via a planning condition. Several of the consultees who have commented on this application have raised concerns with the choice of materials and therefore a pre-commencement condition would ensure that further discussions can take place and the materials can be agreed.
- 9.14 As such, it is considered that the proposal would be acceptable in visual terms and therefore complies with policies CS11 and CS12 in this regard. A more detailed assessment of the proposal in heritage terms is provided below.

Impact on Designated Heritage Assets

Policy context

- 9.15 Policy CS27 of the Core Strategy states that all development will favour the conservation of heritage assets. The integrity, setting and distinctiveness of designated and undesignated heritage assets will be protected, conserved and if appropriate enhanced. Paragraph 199 of the NPPF requires local planning authorities to give great weight to the asset's conservation and the more important the asset, the greater this weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

- 9.16 Saved policy 119 of the Dacorum Borough Local Plan is similar to the above and states that there is a general presumption in favour of the preservation of listed buildings of special architectural or historic interest. Consent to alter or extend listed buildings will only be granted where it can be satisfactorily demonstrated that the proposal will be carried out in a manner appropriate to the scale, proportion and external and internal appearance or historic character of the building to which it relates. Developers may be required to submit information in the form of an impact assessment of the development before the planning application is determined.
- 9.17 Meanwhile saved policy 120 of the DBLP states that new development, alterations or extensions to existing buildings in the conservation areas will be permitted provided they are carried out in a manner which preserves or enhances the established character or appearance of the area. Development proposals outside a conservation area which affect its character and setting will be considered likewise. Each scheme will be expected to:
- (a) respect established building lines, layouts and patterns. In particular, infilling proposals will be carefully controlled;
 - (b) use materials and adopt design details which are traditional to the area and complement its character;
 - (c) be of a scale and proportion which is sympathetic to the scale, form, height and overall character of the surrounding area;
 - (d) in the case of alterations and extensions, be complementary and sympathetic to the established character of the building to be altered or extended; and
 - (e) conform with any design guides for conservation areas prepared by the Council.
- Within a conservation area, applicants are encouraged to submit detailed planning applications. Planning permission may be refused if insufficient detail is provided in applications to judge the impact of the proposed development on the conservation area.
- 9.18 It is however recognised the saved policies 119 and 120 of the DBLP are not entirely consistent with the language of the NPPF, as it does not go on to identify the level of harm and the fact that this would need to be weighed against the public benefits of a scheme. These policies are otherwise considered to be consistent with the aims of national policy and can be given significant weight in decision making.
- 9.19 Sections 66 and 72 of the Planning (Listed Building and Conservation Areas) Act 1990 places a statutory duty on local authorities to have special regard to the desirability of preserving listed buildings, their setting, or any features of special architectural or historic interest which it possesses as well as to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.
- 9.20 Paragraph 194 of the NPPF states that, when 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 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.
- 9.21 In this regard, a Design and Access Statement and a separate Heritage Statement have been submitted in support of the application. The latter of which provides a sufficiently detailed background to the site and the church.

Identifying 'significance'

- 9.22 The submitted Heritage Statement identifies that the church originates from the year 1235 and the tower was added circa 1400, the base of which survives today. The church as it currently stands was substantially re-built in 1844-1846 and is grade II* listed. The significance of the church is extensive in that this lies in its age (C19th), architecture and materiality, its cultural importance as a place of worship as well as the importance of its positioning within the wider settlement and how this settlement has evolved over time, largely due to this positioning and prominence of the churchyard.
- 9.23 The significance of the Bovingdon Conservation Area meanwhile, is set out in the Bovingdon Conservation Area Character Appraisal (2009). This appraisal recognises that the Conservation Area is divided into two distinct character areas, one being the area around the churchyard which is characterised by open space and trees, dominated by the Church, the former Vicarage and Bury Farm. The Character Appraisal as a whole is centred on the Church itself, recognising its historic importance in the evolution of Bovingdon. Section 4 of the Character Appraisal identifies the important historical features within the Conservation Area, which includes matters such as the historic street patterns, whilst Section 6 provides a detailed account of the features of the CA, with the Church falling within 'Area 2'.
- 9.24 Both the heritage statement and Character Appraisal should be read in full in order to fully appreciate the historic context of this site and the wider conservation area.

Proposed siting and location

- 9.25 One of the key considerations in this case is the siting and location of the proposed extension. This has been explored through various pre-application discussions that have taken place with the LPA, but the submission also sets out that further discussions outside of the planning process have taken place as well, such as with the diocese. As already mentioned above in this report, the submission has provided plans which show an alternative location for this facility, along with reasoning as to why these alternative locations have been discounted. Without repeating the contents of those options in full, it appears that the proposed location would be the most appropriate, on the assumption that the extension is acceptable in all other regards. This is because, any extension to the northern side would involve a far more significant impact, any extension to the north-west or south-west of the church (adjacent to the tower) would impact on footpaths through the site (and likely involve a greater amount of exhumation) and any extension along the southern side of the building would likely have a significant impact in terms of sunlight reaching the windows of the church (i.e. the nave). For these reasons, the LPA accepts that the proposed location of the extension is the most appropriate in this instance. It is also acknowledged that a detached building in the grounds of the church may bring about further issues, whether they be security issues, a greater impact on existing graves, a blocking of views of the Church from within the Conservation Area or simply concerns around the practicalities of the facility being provided elsewhere.
- 9.26 As such, the proposed location of the extension to the church does not raise any fundamental concerns in this instance. It has also been noted that the relevant statutory consultees recognise harm but do not suggest that this application should be refused outright. Instead the harm should be weighed against the public benefits as discussed below.

Impact and level of harm

- 9.27 The submission makes reference to the existing flue and an existing WC, deemed by the applicant to be impractical, not least because it cannot be used by disabled persons. In this regard, it is acknowledged that the removal of the flue would make a very limited, but positive, enhancement to the existing church.
- 9.28 Conversely, the proposed extension would lead to some loss of existing views of the church, particularly the northern elevation which would become partially disguised behind the extension. This causes harm to the significance of the listed building, but would also cause some harm to the character and appearance of the conservation area, as well as having some impact (albeit limited) on views into and out of the Conservation Area. Further discussions have also taken place around the tracery, with the applicant clarifying that there would be no material loss in this instance. The choice of materials remains a concern, however as set out above in this report, this can be addressed through further discussions by imposing a planning condition requiring details to be submitted.
- 9.29 Both Historic England and the Council's Conservation and Design Officer conclude that the proposals would result in 'less than substantial harm' in NPPF terms, and officers find no grounds to disagree with this level of harm being concluded. Paragraph 202 of the NPPF states that, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 9.30 The submission has set out reasons why the proposed extension is considered necessary and this is included in the 'statement of need' provided. Furthermore, it is also clear that this suggestion of an extension to accommodate the required space has been discussed over a number of years and attempts have been made on the applicant's part to evolve a scheme that would ultimately result in the least amount of harm possible, although as set out above, harm would still occur.
- 9.31 There would be public benefits in this case, from the construction of the development itself; through providing a communal space for which there has been a significant amount of local support; and by providing the Church with an opportunity to generate increased income by letting these spaces. On this latter point, the income would make some contribution towards the Church remaining viable as a heritage asset and should help to secure its long term future and maintenance. The LPA would also give weight (albeit limited) to the fact that the Church has highlighted its aging population and the need to encouraged families, particularly younger persons, to take an active role in the Church.
- 9.32 Therefore, in weighing the identified level of harm against the potential public benefits of the scheme, it is considered that these benefits would sufficiently and demonstrably outweigh the harm and so the proposal is acceptable in this instance.

Impact on Residential Amenity

- 9.33 Policy CS12 of the Core Strategy states that development should provide a safe and satisfactory means of access for all users; and avoid visual intrusion, loss of sunlight and daylight, loss of privacy and disturbance to the surrounding properties. Paragraph 130 of the NPPF adds that proposals should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

- 9.34 The proposed extension would be located approximately 65m away from the nearest properties in Church Lane and at the corner of Vicarage Lane to the north-west. At this distance, it is not considered that the physical built form of the extension itself would unreasonably affect neighbouring properties in this location. It should also be noted that 'right to a view' is not a material planning consideration. At a distance of some 65m, the proposed extension to the church would not be considered to affect outlook from properties in Church Lane, which is a material planning consideration. Therefore, there would be no material impact on these residential properties.
- 9.35 With regard to the nearest residential properties on Church Street, to the south, the extension would be around 50m away from No.19 Church Street and again, at this distance, it is not considered that any unreasonable harm would occur from the physical built form itself. The extension would be somewhat disguised behind the existing church and only partially visible to this neighbouring property.
- 9.36 The closest residential property to the site and therefore that most likely to be affected is No.21 Church Street, located to the south-east. The rear elevation of this neighbour is located approximately 35m away from the nearest part of the proposed extension. At this distance, and on the basis that the extension is smaller in height and scale than the existing church, it is not considered that any unreasonable harm would occur. For example, there would be no material overshadowing or loss of privacy. In this regard, it is further noted that there is a row of mature trees located towards the southern boundary of the churchyard which provides some screening between the two sites in any case.
- 9.37 For all residential properties that adjoin the site, there may be some disturbance from increased noise, particularly during summer months when doors/windows may be opened, however the community uses taking place in the extension and any associated noise would largely be dimmed by the layout, size and limited opening sizes of the building. The submission does also suggest that an area of hardstanding would be created between the extension and the chancel for some outdoor use, but there is nothing to suggest that this would result in any excessive levels of noise, over and above those that may already be generated from outdoor activities in the church grounds. It should also be noted that any such activities would likely take place for a limited time and it is unlikely therefore that community groups would be on site for an entire day, particularly where children's events are being held.
- 9.38 Some concerns have been raised by local residents in relation to the positioning of the extension and the fact that this will have some impact on existing graves. This is discussed in more detail below in this report.
- 9.39 It is therefore considered that the proposal would not result in any unreasonable impacts to residential amenity and so the proposal is considered to comply with policy CS12 in this regard.

Impact on Highway Safety and Parking

- 9.40 Policy CS12 of the Core Strategy and paragraph 110 of the NPPF requires development to provide safe and suitable access for all users.
- 9.41 The Highway Authority have been consulted who acknowledge the submission of a Transport Statement and note that there are no proposed changes to the highway network. The Transport Statement makes particular reference to the existing hall which is separated from the Church and therefore at present provides its own off-street parking. As set out above in this report, the parking at St Lawrence Hall is however limited and appears only capable of accommodating approximately 4 vehicles (or 8 if double parked).

- 9.42 By comparison to this scheme, the Highway Authority indicate that the new extension would not be expected to result in any significant increases in vehicular movements, compared with the two existing sites when considered together. The Highway Authority further note that the church's location within the village means that a large number of attendees would likely arrive on foot or possibly by bicycle, a positive prospect in their view. As such, the Highway Authority do not raise any objections to the scheme and have not suggested any requirement for planning conditions, although three planning informatives have been suggested.
- 9.43 With regard to parking, this is a matter for the Local Planning Authority but again the Highway Authority raise no concerns in that regard. The Council's Parking Standards SPD (2020) indicates that places of worship should be served by 1 parking space per 10sqm (GEA) of floor area, whilst public halls/places of assembly should be served by 1 space per 9sqm (GEA).
- 9.44 The submitted Transport Statement includes data gathered from a survey conducted of users of the various facilities, whether in relation to the Church congregation or the church hall and activities that take place there such as yoga and an art class. The findings are set out in the Statement, but this can briefly be summarised as around 50-58% of people attending church arriving by car and varying degrees of arrival for the church hall from 50% for one yoga activity and 100% for an afternoon yoga session. It should be acknowledged that this survey provides only a snapshot in time and arrival by car may vary depending on the time of day and whether it is during school term times for example.
- 9.45 On the basis that the church extension would offer approximately the same amount of space as the existing hall, and that the church has indicated an intention to sell the existing hall, it does not appear that there would be any significant changes in parking terms, only that this would take place within the church grounds opposed to at the hall on Vicarage Lane. The submission also confirms that the proposed extension and its rooms contained therein would not be made available during days of congregation, funerals or other similar type events that may result in significant numbers of people on site at any one time.
- 9.46 The submitted statement identifies that there are currently 45 car parking spaces available to the Church and based on the surveys, this would be sufficient to meet the needs of the church and the events that would be held there. The LPA finds no grounds to disagree with these findings and therefore raises no concerns in this regard.
- 9.47 As such, the proposal is considered to comply with policy CS12 of the Core Strategy and complies with the Council's Parking Standards SPD.

Other Material Planning Considerations

Impact on existing graves and archaeology

- 9.48 Concerns have been raised by local residents (and those who live further away but with relatives buried in the churchyard) with the need to exhume bodies near to the church in order for the extension to be constructed. This is naturally a very sensitive matter and would understandably cause concern for the families affected. Officers sought clarification from the applicant over exactly how many graves would be affected, although an exact number has not been provided. One suggestion by an objector is that 13 family member's graves would be affected, although the applicant contests that this would

not be the case. It has however been acknowledged that one wall of the extension would be around 1.4m away from a family grave of that objector.

9.49 The applicant's email via Councillor Barrett acknowledges that a small number of graves would be built over, none of which are C21st, only one of which is C20th and this would presumably mean any other graves affected are much older, indeed they are referred to as 'unmarked' graves. The applicant has also confirmed that ground penetrating radar has been used to carry out a survey of the area where the extension is proposed and suggests that there is a 'high level of confidence' that no recent graves would be affected.

9.50 The applicant has also provided the advice that they received from the Diocese of St Albans. This states as follows:

"Where excavation is proposed within a churchyard, a faculty takes the place of a Home Office Licence. The faculty application process includes consideration of matters such as archaeology and the potential disturbance of buried human remains as part of repairs or development. In the case of an extension to the church building, it is likely a desktop evaluation by an experienced archaeological fieldwork contractor and probably trial pits will be required before the main work is able to start on site, not least so that the extent of risk and its effect on costs can be defined, and perhaps so that mitigation measures can be designed in order to minimise disturbance, such as designing the foundations to rest on a number of concrete piles. Where the development unavoidably uncovers articulated human remains (skeletons), there must be a proper process of archaeological recording, respectful exhumation and at least basic osteological assessment before appropriate sensitive reburial in accordance with directions from the Diocesan Chancellor. The presumption, however, is that if possible, human remains should be left in situ, reflecting that they had originally been entrusted to the care of the Church permanently. There is information about the principles and policy from the Advisory Panel on the Archaeology of Burials in England (APABE) at <https://apabe.archaeologyuk.org/>.

For church and churchyard works requiring planning permission, such as an extension, archaeological aspects will also be a material consideration for the local planning authority. We have a convention that to avoid duplication, the Diocesan Archaeological Adviser (DAA) will normally leave the County Planning Archaeology Service to take the lead, giving pre-app advice and /or as a condition of planning permission. Technically, secular requirements cover ours which can be satisfied by ensuring we are kept informed and are available to advise, should the need arise. Ensuring the appointment of an experienced and competent archaeological contractor is a matter for the local planning archaeological officer and our DAA, and can help ensure that architects and main contractors are aware of potential problems and appropriate procedures."

9.51 The above therefore indicates that there are processes in place, outside of the planning process, that would require a more detailed consideration of this matter, and appropriate consents would also be required from the necessary bodies. Planning decisions should not seek to impose conditions or other unreasonable requirements where these matters may be covered by other legislation.

9.52 Following on from the above therefore, the Archaeology Officer at Herts County Council has been consulted. Their comments make more specific reference to much older burials, possibly dating as far back as the Romans. For the purposes of this planning application, it is considered that the suggested planning conditions would encompass any graves in the area affected and the Written Scheme of Investigation required by the condition would need to be submitted before any works commence on site. This would therefore provide

sufficient clarification over the number of graves affected, as well as details as to their age etc. before any groundworks commence. On that basis, it is considered that the application is acceptable in this regard.

Environmental Health

9.53 The Council's Environmental Health team have been consulted and raise no objections in relation to Contaminated Land. Noting the above, the matter here is one of archaeology, rather than in relation to any former land uses. The EH team were also consulted in relation to noise and air quality but raised no concerns, however did request the inclusion of three planning informatives as part of any grant of planning permission.

Response to Neighbour Comments

9.54 These points have been addressed above within the relevant sections of the report.

10. CONCLUSION

10.1 To conclude, the proposed extension would be acceptable in principle and the report has recognised the potential benefits of the scheme to the local community, such as through providing a dedicated space to hold meetings and carry out activities as part of community groups, whether related to church activities or not.

10.2 The proposals would result in harm to the significance of the church and the conservation area and this level of harm is considered to be 'less than substantial' in NPPF terms. This level of harm is considered to be outweighed by the public benefits in this case.

10.3 The report has also identified that there would be no significant impact on any neighbouring amenity and the development would be acceptable having regard to highway safety and parking provision.

10.4 The proposal is therefore considered to comply with the Development Plan and should be supported.

11. RECOMMENDATION

11.1 That planning permission be **GRANTED**, subject to conditions.

Condition(s) and Reason(s):

- 1. The development hereby permitted shall begin before the expiration of three years from the date of this permission.**

Reason: To comply with the requirements of Section 91 (1) of the Town and Country Planning Act 1990, as amended by Section 51 (1) of the Planning and Compulsory Purchase Act 2004.

- 2. No development shall take place/commence until an Archaeological Written Scheme of Investigation has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of archaeological significance and research questions; and:**

- 1. The programme and methodology of site investigation and recording;**

- 2. The programme and methodology of site investigation and recording as required by the evaluation;**
- 3. The programme for post investigation assessment;**
- 4. Provision to be made for analysis of the site investigation and recording;**
- 5. Provision to be made for publication and dissemination of the analysis and records of the site investigation;**
- 6. Provision to be made for archive deposition of the analysis and records of the site investigation;**
- 7. Nomination of a competent person or persons/organisation to undertake the works set out within the Archaeological Written Scheme of Investigation.**

Reason: To ensure that reasonable facilities are made available to record archaeological evidence in accordance with saved Policy 118 of the Dacorum Borough Local Plan (2004), Policy CS27 of the Dacorum Borough Core Strategy (2013) and Paragraphs 194 and 205 of the National Planning Policy Framework (2021).

3.
 - i) Any demolition/development shall take place in accordance with the Written Scheme of Investigation approved under Condition 2.**
 - ii) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition (2) and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.**

Reason: To ensure that reasonable facilities are made available to record archaeological evidence in accordance with saved Policy 118 of the Dacorum Borough Local Plan (2004), Policy CS27 of the Dacorum Borough Core Strategy (2013) and Paragraphs 194 and 205 of the National Planning Policy Framework (2021).

4. **No development (excluding demolition/ground investigations) shall take place until details of the materials to be used in the construction of the external surfaces of the development hereby permitted have been submitted and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details. Please do not send materials to the Council offices. Materials should be kept on site and arrangements made with the Planning Officer for inspection.**

Reason: To preserve or enhance the character and appearance of the designated heritage asset in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990 and Policy CS27 of the Dacorum Borough Core Strategy (2013).

5. **Notwithstanding Condition 4 above, all approved flint work shall be built freehand.**

Reason: To ensure that the character or appearance of the designated heritage asset is preserved or enhanced as required per Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, Policy CS27 of the Dacorum Borough Core Strategy (2013) and Section 16 of the National Planning Policy Framework (2021).

6. **The development hereby permitted shall be carried out in accordance with the following approved plans/documents:**

1248 PP 000 (Location Plan);
1248 PP 020 (Proposed Site Plan);
1248 PP 021 (Proposed Ground Floor Plan);
1248 PP 022 (Proposed North Elevation);

1248 PP 023 (Proposed East Elevation);
1248 PP 024 (Proposed South Elevation);
1248 PP 025 (Proposed West Elevation);
1248 PP 026 (Proposed Sunday Service Layout);
1248 PP 027 (Proposed Concert Layout);
1248 PP 028 (Proposed Festival Layout);
1248 PP 033 (Proposed Section AA);
1248 PP 034 (Proposed Roof Plan);
1248 PP 035 (Proposed Section BB).

Reason: For the avoidance of doubt and in the interests of proper planning.

Informatives:

1. Planning permission has been granted for this proposal. The Council acted pro-actively through early engagement with the applicant at the pre-application stage which lead to improvements to the scheme. The Council has therefore acted pro-actively in line with the requirements of the Framework (paragraph 38) and in accordance with the Town and Country Planning (Development Management Procedure) (England) (Amendment No. 2) Order 2015.
2. Construction Hours of Working - (Plant & Machinery) Informative

In accordance with the councils adopted criteria, all noisy works associated with site demolition, site preparation and construction works shall be limited to the following hours: Monday - Friday 07.30am - 17:30pm, Saturdays 08:00am - 13:00pm, Sundays and Bank Holidays - no noisy works allowed.
3. Construction Dust Informative

Dust from operations on the site should be minimised by spraying with water or by carrying out of other such works that may be necessary to suppress dust. Visual monitoring of dust is to be carried out continuously and Best Practical Means (BPM) should be used at all times. The applicant is advised to consider the control of dust and emissions from construction and demolition Best Practice Guidance, produced in partnership by the Greater London Authority and London Councils.
4. Noise on Construction/Demolition Sites Informative

The attention of the applicant is drawn to the Control of Pollution Act 1974 relating to the control of noise on construction and demolition sites.
5. Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence. Further information is available via the County Council website at: <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/business-licences/business-licences.aspx> or by telephoning 0300 1234047.
6. Obstruction of highway: It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the

applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence. Further information is available via the County Council website at:
<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/business-licences/business-licences.aspx> or by telephoning 0300 1234047.

7. Debris and deposits on the highway: It is an offence under section 148 of the Highways Act 1980 to deposit compost, dung or other material for dressing land, or any rubbish on a made up carriageway, or any or other debris on a highway to the interruption of any highway user. Section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure that all vehicles leaving the site during construction of the development and use thereafter are in a condition such as not to emit dust or deposit mud, slurry or other debris on the highway. Further information is available by telephoning 0300 1234047.

APPENDIX A: CONSULTEE RESPONSES

Consultee	Comments
Conservation & Design (DBC)	<p>The church is of great importance as noted by its grade II* listing. There are some fragments of an early church contained within the lower fabric of the main building and within the tower but as described in the statement of significance and the listing the church essentially dates from the 19th century rebuilding. This was undertaken by a notable architect Thomas Talbot Bury and is described as being in a scholarly Gothic style. The interior has had some alterations but contains a large number of pews still retaining their doors and numbering. It is noted that on reviewing the heritage review of these features the expert guidance suggests that the pews are completely contrary to the architecture of the church and that the church is "badly let down by the poor quality and uninspiring design of the extant set of box pews".</p> <p>There has been a variety of pre application proposals for the site. We note that many of our concerns have been discussed in the heritage statement with regards in particular to location and position of the extension and the impact of this upon the appearance and significance of the church.</p> <p>With regards to this we believe that the reduction in scale and change in design would address concerns. We also note that the various other bodies consulted did not raise concerns with regards to the extension beyond the east end of the church. This was because the church is a good example of neo-gothic design by one of its leading practitioners of the period. This movement followed on from the medieval gothic religious architecture which saw spiritual symbolism in all the features and elements of the church. Through this the subdivision of church space into ascending levels of holiness. In this instance the movement through the space within the building towards the eastern end from the nave to the chancel. We would therefore express concern at the</p>

	<p>extension beyond the chancel of the church. It would appear contrary to the symbolism and importance of the buildings existing form particularly when noted to be of great significance in this instance when considering the character of the heritage asset. However if the relevant church bodies do not consider that this is a major issue we would not object on these grounds.</p> <p>We would still believe that this would cause a level of harm with regards to the impact on appearance and significance of the building. Given the advice received from external bodies we would consider this to be less than substantial and at a low level. This harm would need to be balanced against the public benefits of the scheme as per the weighting within the framework.</p> <p>We would agree with the Historic England comment that the West Gable design should be reviewed as we are also not convinced that the flint infill/ brick are successful. It may be better to considered a completely flint gable at this location but would be willing to review other options. We also share the concerns with regards to the louvres.</p> <p>We would also raise concerns with the loss of the tracery and hope that it could be retained as part of the new entrance into the church.</p> <p>Recommendation We would recommend that the above points with regards to the design detail be reviewed. We would not object but would recommend that the officer weighs the harm identified against the public benefits of the scheme as noted in the application.</p>
Archaeology Unit (HCC)	<p>Thank you for consulting me on the above application.</p> <p>Please note that the following advice is based on the policies contained in the National Planning Policy Framework.</p> <p>The proposed development is within Area of Archaeological Significance no. 48, as identified in the Local Plan. This covers the historic core of Bovingdon, which has origins in the Anglo-Saxon period, the parish church of St Lawrence and its graveyard, the manorial site of Bury Farm, and evidence of Roman and medieval occupation.</p> <p>The proposed works involve an extension and minor alterations to the north elevation of the church itself.</p> <p>The parish church of St Lawrence [Historic Environment Record No 936], is medieval in origin, but was 'thoroughly restored' in 1845 so that much of the fabric is of this date. It was reported in the mid 19th century that 'when the chapel of St Lawrence was demolished there were</p>

indications of Anglo-Saxon origin'. This evidently refers to the wholesale restoration works. However, at that date 'Anglo-Saxon' could mean Norman, rather than pre-conquest.

In addition, a complete Roman pot (an open flat dish, oval, only 13 cm long, and made of Black-burnished Ware (BB1)) was found by a gravedigger in Bovingdon churchyard [HER 17175]. This may be derived from a burial of Roman date (its date is likely to be between AD 120 and 400). In 2010 an archaeological evaluation to the rear of the houses on the south side of Church Street identified a feature which produced pottery of Roman date, which indicates there was Roman occupation and burial in this area.

It is also likely that the groundworks of the scheme may disturb human remains of possible medieval, and certainly of post-medieval date.

I believe therefore that the proposed development is such that it should be regarded as likely to have an impact on heritage assets of archaeological interest and I recommend that the following provisions be made, should you be minded to grant consent:

1. The archaeological evaluation, via 'strip, map and record', of the area of the proposed extension, prior to the commencement of the groundworks of the development.
2. Such appropriate mitigation measures indicated as necessary by that evaluation.

These may include:

- a) the preservation of any remains in situ, if warranted,
- b) appropriate archaeological excavation of any remains before any development commences on the site, with provisions for subsequent analysis and publication of results,
- c) archaeological monitoring of the groundworks of the development (also including a contingency for the preservation or further investigation of any remains then encountered),
- d) such other provisions as may be necessary to protect the archaeological interests of the site;

3. The archaeological building recording of the area of the building that will be affected by the development, before any development commences;

4. the analysis of the results of the archaeological work, with provisions for the subsequent production of a report and an archive, and the publication of the results, as appropriate;

5. such other provisions as may be necessary to protect the archaeological interests of the site.

I believe that these recommendations are both reasonable and necessary to provide properly for the likely archaeological implications of this development proposal. I further believe that these recommendations closely follow para. 205, etc. of the National Planning Policy Framework, relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015).

In this case two appropriately worded conditions on any planning consent would be sufficient to provide for the level of investigation that this proposal warrants. I suggest the following wording:

Condition A

No development shall take place/commence until an Archaeological Written Scheme of Investigation has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of archaeological significance and research questions; and:

1. The programme and methodology of site investigation and recording;
2. The programme and methodology of site investigation and recording as required by the evaluation;
3. The programme for post investigation assessment;
4. Provision to be made for analysis of the site investigation and recording;
5. Provision to be made for publication and dissemination of the analysis and records of the site investigation;
6. Provision to be made for archive deposition of the analysis and records of the site investigation;
7. Nomination of a competent person or persons/organisation to undertake the works set out within the Archaeological Written Scheme of Investigation.

Condition B

- i) Any demolition/development shall take place in accordance with the Written Scheme of Investigation approved under Condition A.
- ii) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition (A) and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.

	<p>I believe that these recommendations are both reasonable and necessary to provide properly for the likely archaeological implications of this development proposal. I further believe that these recommendations closely follow para. 205, etc. of the National Planning Policy Framework, relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015).</p> <p>If planning consent is granted, then this office can provide details of the requirements for the investigation and information on archaeological contractors who may be able to carry out the work.</p>
<p>Bovingdon Parish Council</p>	<p>Support although have concerns over materials to be used and what is being proposed in a conservation area</p>
<p>Environmental And Community Protection (DBC)</p>	<p>Having reviewed the application submission and the ECP Team records I am able to confirm that there is no objection on the grounds of land contamination. Also, there is no requirement for further contaminated land information to be provided, or for contaminated land planning conditions to be recommended in relation to this application.</p> <p>With reference to the above planning application, please be advised Environmental Health have no objections or concerns. However I would recommend the application is subject to construction working hours with Best Practical Means for dust.</p> <p>Construction Hours of Working - (Plant & Machinery) Informative</p> <p>In accordance with the councils adopted criteria, all noisy works associated with site demolition, site preparation and construction works shall be limited to the following hours: Monday - Friday 07.30am - 17:30pm, Saturdays 08:00am - 13:00pm, Sundays and Bank Holidays - no noisy works allowed.</p> <p>Construction Dust Informative</p> <p>Dust from operations on the site should be minimised by spraying with water or by carrying out of other such works that may be necessary to suppress dust. Visual monitoring of dust is to be carried out continuously and Best Practical Means (BPM) should be used at all times. The applicant is advised to consider the control of dust and emissions from construction and demolition Best Practice Guidance, produced in partnership by the Greater London Authority and London Councils.</p>

	<p>Noise on Construction/Demolition Sites Informative</p> <p>The attention of the applicant is drawn to the Control of Pollution Act 1974 relating to the control of noise on construction and demolition sites.</p>
Parks & Open Spaces (DBC)	No comment.
Hertfordshire Highways (HCC)	<p>Notice is given under article 18 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that the Hertfordshire County Council as Highway Authority does not wish to restrict the grant of permission.</p> <p>Highway Informatives HCC as Highway Authority recommends inclusion of the following Advisory Note (AN) / highway informative to ensure that any works within the highway are carried out in accordance with the provisions of the Highway Act 1980:</p> <p>AN 1) Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence. Further information is available via the County Council website at: https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/business-licences/business-licences.aspx or by telephoning 0300 1234047.</p> <p>AN 2) Obstruction of highway: It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence. Further information is available via the County Council website at: https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/business-licences/business-licences.aspx or by telephoning 0300 1234047.</p> <p>AN 3) Debris and deposits on the highway: It is an offence under section 148 of the Highways Act 1980 to deposit compost, dung or other material for dressing land, or any rubbish on a made up carriageway, or</p>

	<p>any or other debris on a highway to the interruption of any highway user. Section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure that all vehicles leaving the site during construction of the development and use thereafter are in a condition such as not to emit dust or deposit mud, slurry or other debris on the highway. Further information is available by telephoning 0300 1234047.</p> <p>Comments</p> <p>The proposal is for the the construction of a single storey extension, associated alterations and external works to form a community hall at St Lawrence Church, Church Street, Bovington. Church Street is a 30 mph unclassified local access route that is highway maintainable at public expense.</p> <p>Vehicle Access and Parking</p> <p>The church has two existing parking areas which are both accessed via bellmouths onto the highway network. The proposal is to stop using the existing church hall off-site and construct a new church hall/ extension directly connected to the existing church. Parking is a matter for the Local planning authority and as such any parking arrangements must be agreed by them. The applicant has provided a transport statement which illustrates the capacity of the existing parking and the expected movements to and from the church (including the new hall) in relation to activities that are currently held at the existing separated community hall. The existing community hall and its vehicle provisions are considered to be adequate regarding the slight increase in trips provided to the new extension onto the church. This decision has been made in relation to the transport statement and the use of the church and new hall as one entity which would mitigate against the use of the extension and the church separately. The nature of the churches location within the village will mean that many people will walk or cycle to the church as oppose to drive which HCC Highways encourages. No proposed changes are to occur to the existing highway network.</p> <p>Conclusion</p> <p>HCC has no objections or further comments on highway grounds to the proposed development, subject to the inclusion of the above highway informatives.</p>
Historic England	<p>Thank you for your letter of 15 October 2021 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.</p> <p>Historic England Advice</p>

The Church of St Lawrence is a Grade II* Listed building. It was much restored in the 19th century although some early material has escaped restoration and survives intact, mainly in the south aisle. It is situated within a large churchyard which contains graves.

The proposed scheme is to provide a function room to enable the church to provide community facilities and to enable it to host community events. This has been the result of a long pre-application engagement and the scheme has much improved since the beginning of this process however, the following areas still cause some concern;

- o The materials on the west gable seem to be trying to mirror a ruined church that has been rebuilt. This is not particularly successful as the materials are brick on the bottom with flint infill and as the building is mainly faced in flint, it appears rather jarring. It may be better for the materials to be of one kind be that brick or flint which would sit more comfortably within the vicinity of this historic building. The modern detailing around the windows takes its cue from the historic building and this is a successful part of the scheme.

- o The louvres on the west gable window are out of place in this context. A plain glass window would be more in keeping.

- o The alteration in the north aisle of a window to a door is of concern given the plans show the entire loss or replacement of tracery from the former window

Although the need for a door is recognised, and the glazed link from this new door is rather striking, the loss of the tracery seems unnecessary. What is the reason for this replacement and why is the original not able to be kept?

The success of this scheme will lay in the fine design details and while the scheme is an improvement on the last we saw at pre-application stage, some minor changes could represent a less harmful scheme in the longer term.

Policy Context

Paragraph 199 of the NPPF states that when considering the impact of a proposed development upon the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater that weight should be).

Paragraph 200 of the NPPF states that any harm to or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.

Paragraph 202 of the NPPF states that where a development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefit of the scheme.

Historic England's Position

Historic England consider that the principle of an extension in this

	<p>location could be appropriate subject to minor design changes which would preserve or enhance the character and significance of this grade II* listed building. The loss of the window tracery has not yet been justified. We therefore suggest that at present the scheme is not in accordance with paragraphs 199 and 200 of the NPPF.</p> <p>We therefore consider that with some design changes this scheme could be considered to represent a change to the character and significance of this building which falls short of harm however at present, there is the potential for less than substantial harm, low/moderate in scale. We therefore consider that your local planning authority should undertake the planning balance as required by paragraph 202 of the NPPF.</p> <p>Recommendation</p> <p>Historic England has concerns regarding the application on heritage grounds.</p> <p>We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 199, 200 and 202 of the NPPF.</p> <p>In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.</p> <p>24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU Telephone 01223 582749 HistoricEngland.org.uk</p> <p>Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.</p> <p>Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.</p>
<p>National Societies Amenity</p>	<p>Thank you for consulting the Victorian Society on this proposal. I apologise for the delay in your receiving our advice.</p> <p>As you know, this case was considered by the Society's Southern Buildings Committee toward the end of November. Its discussion and advice informs the following comments, which raise considerable concern with certain aspects of the parish's overarching ambitions, or at least the manner in which they seek to achieve them.</p> <p>Having said that, the principle of an extension is in our view unobjectionable. While we are grateful for the opportunity to comment, it is disappointing that the Society has only been consulted on the</p>

proposed extension of a building that is both highly listed and almost entirely Victorian only at the point at which the scheme has been finalised and submitted for approval to the local authority. The Society is always open to and encourages early involvement and extensive pre-application discussion, the purpose of which is to attempt to resolve any concerns before the point of submission. As it is, we find ourselves in the position of having to offer advice on a scheme that has evolved through a long period of consideration and discussion, and which is, in the parish's eyes, finalised. At this stage there seems little point in addressing matters of fundamental principle, or issues such as the precise location of the extension, on which the Committee was unconvinced. We therefore don't wish to comment on the broad principles of the scheme, other than to say that a substantial extension of the sort proposed would surely undermine any case that might subsequently be made to justify the substantial clearance of the church's historic interior.

We are not convinced by the detailed design of the proposed hall, although we can see the rationale for the form, for instance, of the roof. However, its predominantly brick exterior would likely look out of place beside the church, which is, materially, so harmoniously of a piece. The way in which flint is proposed to be used around the windows also appears needlessly contrived (in detail, not in principle) and is, ultimately, unsuccessful. Overall we consider the design of the extension to fall short of the quality that would be expected of the site and the nature and significance of this fine church.

While the proposed extension would undoubtedly cause harm to the setting of the church, our greatest concern is what is being contemplated for the II*-listed building itself. While potential future alterations to the interior of the church are not relevant to the determination of this application, we must at this stage express profound concern at the sweeping internal changes being envisaged. The loss of the pews outlined in some of the documents would cause a very high level of harm, and seems in part to be proposed on the basis of a pew report that is simply not fit for purpose, the conclusions of which we completely refute. If the parish is serious about pursuing any degree of de-pewing, then it will need to commission a genuinely scholarly and objective report on the significance of the pews. The present pew report does the parish a serious disservice and fails to provide any sort of objective basis by which to understand the significance of the historic furnishings and the impact of their removal.

The Society would welcome early consultation from the parish if it continues to pursue the possibility of any significant amount of de-pewing.

<p>Conservation & Design (DBC)</p>	<p>These relate to the revised supporting documents: The church is of great importance as noted by its grade II*</p> <p>We note the comments with regards to the east/ west elevations.</p> <p>In relation to the flint/ brick details we would continue to disagree with the proposed design choices. St Albans abbey shown in the image has 1000 years of history visible within the structure hence the differing materials and positions. This is not comparable with constructing a completely new addition which appears to be trying to create a patina of history on an extension of one period.</p> <p>Further evidence of works to the original windows where the door is located is welcomed.</p> <p>We note the comments in relation to the louvers.</p> <p>We therefore remain to be convinced that the proposal is an appropriate response to the extension of the church. We would still believe that this would cause a level of harm with regards to the impact on appearance and significance of the building. We would consider this to be less than substantial and at a low level. This harm would need to be balanced against the public benefits of the scheme as per the weighting within the framework.</p> <p>Recommendation We would not object but would recommend that the officer weighs the harm identified against the public benefits of the scheme as noted in the application. Should the officer recommend approval external materials including mortar and that the flint be hand work should be conditioned.</p>
<p>Historic England</p>	<p>Thank you for your letter of 5th January 2022 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.</p> <p>Historic England Advice We note the letter provided by the agent and uploaded on 7th December 2022 which provides extra explanation of the design details of the scheme. We apologise firstly for the error in the orientation of the building, The clarification on the retention of the tracery and the additional tracery proposed around the north door is useful and answers the question posed in our previous comments. Our comments dated 4th November 2021 do not object to this scheme rather they note some concerns relating to the design of the building which have in part been addressed by the recent submitted comments however, we remain of the view that an extension built of one material</p>

	<p>would be more successful than a forced mix of two. We are aware of many examples where changes over time have meant replacements to part of elevations in contrasting materials but to design in this contrast from the outset seems contrived.</p> <p>The modern extension linking the church to the new room is via a glazed link and while this is a modern and striking intervention, the ability to see through the link to the door behind is an advantage. The rather blank brick wall in which this striking glazed panel sits within is rather disappointing and could do more to respond to the architecture of the north aisle.</p> <p>Recommendation</p> <p>Historic England has concerns regarding the application on heritage grounds. We consider that your local authority should consider the planning balance as required by paragraph 202 of the NPPF.</p> <p>We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 199, 200 and 202 of the NPPF. Please see our comments dated 4th November 2021 for the policy context.</p> <p>In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.</p> <p>Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.</p>
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APPENDIX B: NEIGHBOUR RESPONSES

Number of Neighbour Comments

Neighbour Consultations	Contributors	Neutral	Objections	Support
37	24	2	3	19

Neighbour Responses

Address	Comments
3 Little Park Bovingdon Hemel Hempstead Hertfordshire HP3 0JB	<p>I am in favour of this application both as a member of St Lawrence Church congregation and a resident of Bovingdon.</p> <p>The church sits in the heart of the village and needs redeveloping in order to expand its service to the community. To do this additional space is needed with modern facilities such as disabled toilets.</p> <p>The linked hall will provide flexible space for Children's Ministry on a</p>

	<p>Sunday which currently takes place in a side aisle. It will also create meeting rooms for weekday activities for all age groups.</p> <p>In addition the combined space of the church and hall will accommodate events such as concerts and festivals that require a bigger space than the Memorial Hall.</p>
<p>4 The Hollies Bovingdon Hemel Hempstead Hertfordshire HP3 0ND</p>	<p>A vital development to enable the church to conform to modern standards expected of public buildings (e.g. wheelchair access, toilet facilities) ; to establish a building flexible to accommodate different forms of worship (e.g. young people groups can be accommodated simultaneous with worship services); to establish a building capable of seven day per week use by the church and wider community (e.g. office and server kitchen facilities and small meeting rooms).</p>
	<p>I wish to object to the above proposal to build an extension on to the church.</p> <p>My family are buried there and according to the plans my father uncle and cousin's graves would be too close to this building which would be disruptive to the graves.</p> <p>My mother died last year and we are waiting for family to visit the UK when we intend to have her ashes interred with my father. My uncles ashes have been interred with my father and it is also my aunties wish to have her ashes interred with her husband. Not exactly ideal or respectful to be planning to build an eyesore in my opinion so close to the graves.</p> <p>I oppose this application on the grounds given above.</p>
<p>11 Eastnor Bovingdon Hemel Hempstead Hertfordshire HP3 0QL</p>	<p>As a long term resident of Bovingdon and active member of the congregation, I fully support the construction of the extension. This extension will not only be used for church purposes but for community engagement activities which will benefit the residents of Bovingdon and the wider community.</p>
<p>Long Meadow Flaunden Lane Bovingdon Hemel Hempstead Hertfordshire HP3 0PA</p>	<p>I support the proposal so that St Lawrence Church may be enabled to provide spiritual and community services to the people of Bovingdon that are fit for the current century and beyond. Without this development the church will become nothing more than a museum.</p>
<p>4 Lancaster Drive Bovingdon Hemel Hempstead Hertfordshire HP3 0RX</p>	<p>This proposal addresses a key need in Bovingdon, and for St Lawrence Church.</p> <p>I am a regular user of the church, alongside all members of my family. The current provision of space is not-fit-for-purpose. The church hall is separated from the main building by a significant distance which makes combined use impractical. The church is significantly limited in its ability to</p> <p>This proposal addresses a key need in Bovingdon, and for St Lawrence Church.</p> <p>I am a regular user of the church, alongside all members of my family. The current provision of space is not-fit-for-purpose. The church hall is separated from the main building by a significant distance which makes combined use impractical.</p> <p>The church is significantly limited in its ability to hold events and</p>

	<p>fundraising due to the lack of space and having no ability to split the space according to need. The lack of disabled access and indoor toilet is also a problem.</p> <p>As a resident of the village, we are lacking sufficient community space and this would help to address that. As a user of the church, the need is clear. This proposal has my full support.</p>
<p>Ty Isaf Trelewis CF46 6RD</p>	<p>The architect who drew up the plans has confirmed that the area of AT LEAST THIRTEEN of my family's graves - several of which are less than 25 years old - will be "disturbed" by this work: either my family members will be dug up and moved, their graves built upon, or their graves disturbed by digging the footings and the general act of building. Some of these graves are waiting for the end of COVID-19 to have more recently deceased relatives' ashes interred.</p> <p>My family have lived in Bovingdon for over 200 years. There are over 200 family baptisms, marriages and funerals recorded in the Church Registers at St Lawrence Church, Bovingdon. Many of us still live in the area, and at least five generations of the family are buried at St Lawrence Church.</p> <p>This plan shows lack of reverence for past family members. These graves are not just a piece of local history; these are ordinary people who suffered all the ordinary emotions as we do today:- some were soldiers fighting in the Boer War and the Great War; one was also a Chelsea pensioner; my great grandmother was buried there in 1910, after dying in a fire; two of her children died as infants and are buried right by the back door of the church. The proposed building work also shows a deep lack of respect for contemporary family members who are still alive and living locally, some of whom propose to be buried in this family area in the fullness of time.</p> <p>A principle of the Church of England is that burial of human remains after death is a FINAL act unless there are exceptional reasons to disturb those remains. I do not accept that the reasons for this building meet the criteria.</p> <p>I cannot agree with the Church statements that the new building will blend in with the original Church building and its surroundings. It will be immediately adjacent to the church and the difference in appearance and materials will be in sharp contrast - the mix of brick, flint, different colour roofing, glass entrance, etc., does not look at all in keeping with the current church of 1845 - which is a Grade II listed building.</p> <p>It will also look out of place in the predominantly green surroundings of the remainder of the Churchyard. The type of proposed events will disturb the peace, tranquility and comfort that the churchyard is intended to provide - the wide range of activities such as concerts, fundraisers, festivals, wedding receptions will compromise this.</p> <p>Further consideration should also be given to additional air pollution as the purpose of the new building is to attract more people - thereby undoubtedly bringing more traffic to the church and the village, and this will in turn impact the parking situation in the village. The church has</p>

	<p>very limited parking of its own.</p> <p>I oppose the Planning Application on the grounds of traffic, pollution, parking, ecology, tranquility lost, and the sanctity of graves and urge you to agree to reject the planning application.</p>
<p>1 Dellfield Close Berkhamsted Hertfordshire HP4 1DS</p>	<p>I have been a member of St Lawrence congregation for more than 30 years. The church facilities are much in need of updating and the new hall will bring so many benefits to the congregation and to the local community.</p>
<p>6 Granville Dene Bovingdon Hemel Hempstead Hertfordshire HP3 0JE</p>	<p>We fully support this application. Adequate disabled access and toilet facilities are long overdue. A fit for purpose kitchen, modern meeting rooms and office space would enable the building to be used effectively for worship and so many more events, both for the congregation and for the wider community. The parking available is much more generous and accessible than at the current hall, making this development an attractive option for use by community groups. This development would give both the congregation and the community a modern, accessible, user friendly facility that it is currently lacking.</p>
<p>12 Lancaster Drive Bovingdon Hemel Hempstead Hertfordshire HP3 0RX</p>	<p>I support the need to provide adequate facilities both for the worshipping community and village as a whole. Currently there is a hall some distance from the church down a narrow, difficult to traverse route (no footpath). It has a restricted parking area, which regularly floods, rendering access to the front door impossible for potential hall-users. (Photo evidence available). The storage area is reached by exiting the hall to one side and then into a separate portacabin so that everything needed for an activity - tables, chairs, play mats, toys etc must be taken outside before they can be used inside the hall. Poor weather means hall users get wet and cold passing furniture to each other from the portacabin into the hall and back after use. This is impractical and potentially unsafe underfoot in wet weather leading potential hall users to seek alternative venues outside of Bovingdon village. The two toilets, while sufficient, are heated by facilities more usually seen to keep frost from greenhouses.</p> <p>The church congregation is unlikely to grow within the current restricting, fixed pews arrangement as there is nowhere for children to take part in separate activities from the main service. No designated area for feeding infants, changing facilities or even a decent toilet (when several should be provided).</p> <p>As the church currently presents, there lacks the opportunity to open up to a wider village use due to the cramped nature of the fixed layout, lack of storage, office space, fit-for-purpose kitchen, appropriate disabled access and toilet facilities. This in turn restricts the opportunity for the church to cover the sorely needed cost of maintenance and cleaning which currently falls on the shoulders of the aging congregation.</p> <p>Please pass the plan for our lovely new hall so that Bovingdon villagers can benefit from it for many generations to come.</p>
<p>21 Chipperfield Road Bovingdon Hemel Hempstead Hertfordshire</p>	<p>I support this application for an extension. There is a great need for a church hall including toilet facilities and a disabled toilet adjacent to the church. This could be made available to the general public where there is a great need for more meeting rooms. I believe this application has</p>

HP3 0JN	the support of the Parish Council. Toilets at the church at present are totally inadequate.
Church View 10 Church Street Bovingdon Hemel Hempstead Hertfordshire HP3 0LU	This extension will provide a much needed facility which will benefit both the church congregation and the wider community. The new hall will be modern, flexible and attractive to a number of community groups. It will also help to attract new generations to the church who will in turn support it financially and keep it viable. The plans also provide access for disabled people to both hall and church.
21 Church Street Bovingdon Hemel Hempstead Hertfordshire HP3 0LU	Comments can be viewed online via public access at dacorum.gov.uk (planning applications)
20A Church Street Bovingdon Hemel Hempstead Hertfordshire HP3 0LU	<p>We fully support this application. We are regular attendees of the church as well as close neighbours and can fully appreciate the great need for this extension to accommodate the current requirements of the church and local community. It will provide essential space for church activities, especially for children and young families, particularly during services as well as local groups at other times . At present many of these activities can only take place in the church hall on Vicarage Lane where there is minimal parking and unsafe pedestrian access from the church due to no pathway down a narrow, unlit roadway.</p> <p>The extension will provide a fully accessible and welcoming space to enable all of the existing outdated church facilities and community uses to be accommodated in an attractive, safe and well resourced space constructed to modern building standards whilst being sympathetic to the design to the original building. The extension will also represent an incredibly useful adjunct for providing flexible meeting and activity space in a safe, centrally located established site in the village with excellent access and parking.</p>
20 Church Street Bovingdon Hemel Hempstead Hertfordshire HP3 0LU	We support the need for the development but feel that the red brick outer walls do not blend in with the church and would like to see it of a matching construction.
Martlets Church Lane Bovingdon Hemel Hempstead Hertfordshire HP3 0HS	<p>As a neighbour of the Church and a regular attendee and frequent attendee I'm supportive of the plans.</p> <p>I think the extension will benefit the Church and village community by providing a more flexible space and modern facilities. Especially better wheelchair access, toilet and kitchen facilities.</p> <p>The Church building needs to make the updates now that will prepare it for the next 100 years.</p>
Church Lane House Vicarage Lane Bovingdon	letter of support can be viewed on-line via public access at dacorum.gov.uk search planning applications.

<p>Hemel Hempstead Hertfordshire HP3 0LT</p>	
<p>1 Lychgate Cottages Church Lane Bovingdon Hemel Hempstead Hertfordshire HP3 0HS</p>	<p>My wife and I support this application. An extension to create much needed additional facilities, including modern toilets, kitchen and meeting facilities is long overdue if St Lawrence Church is going to survive and evolve as a working church for its community - that community stretching far beyond the church electoral roll. Research shows that there are at least 12 redundant failed churches for sale in London that has been unable to adapt to change and meet the requirements demanded by a younger generation of parishioner. An extension to the existing Grade 2* building is essential and will be a much needed asset of community value.</p> <p>I say this as a resident of the neighbouring Lychgate Cottages - four of the cottages being the original 'church cottages' dating to the 1600s, and located immediately to the north of the Church.</p> <p>Therefore, my wife and I are among those most impacted by any 'new build' in the churchyard. And we support the application.</p> <p>I note the comments of the parish council - which also supports the application - and some local residents about the choice of building materials for this extension in Bovingdon's Conservation Area. I am sure compromise can be reached to ensure this planning application is approved.</p> <p>There has been a Church on this site since the 13th Century and the current church dates to 1846 in one of Hertfordshire's largest churchyards and the largest still open for burials. The church has served its congregation well - long may that continue with new, modern, efficient facilities benefiting the whole community.</p>
<p>3 Homefield Bovingdon Hemel Hempstead Hertfordshire HP3 0HU</p>	<p>I support this application.</p> <p>I am not a regular church goer at St Lawrence, but having been a Bovingdon resident for 30 years I have attended the church for many occasions - Christmas/ Easter events with my children's school, weddings, funerals, fetes etc - and I can appreciate that the church community is trying to provide better facilities for themselves and also the wider community. I have hired their existing hall for events and it is definitely past it's best - to have a new purpose built, multi functional space attached to the church itself would be highly advantageous. It would be beneficial to the church congregation and also be a hub for local community groups and events. It will allow the church to enhance its connection with the wider community and allow it to thrive in the future.</p>
<p>Berrymoor Shothanger Way Bovingdon Hemel Hempstead Hertfordshire HP3 0DW</p>	<p>I have been a member of St.Lawrence church since 1994. I am particularly concerned that the facilities do not meet the needs of the children as far as Sunday school activities are concerned. We have been forced to use a facility located on a road the children need to walk to which is dangerous(Vicarage Lane) I strongly believe this single storey planning application will meet those needs. Also as a church this new facility will be so much more inclusive in it's flexible use for the rest</p>

	of the residents in Bovingdon.
6 Ryder Close Bovingdon Hemel Hempstead Hertfordshire HP3 0HY	<p>This proposed development will provide not only St Lawrence Church, but also the whole village community with an up-to-date facility and resource able to cater for the many varied groups within the village. (e.g., toddler groups, support groups etc). It will also enable the Church to develop their own community activities.</p> <p>This is a modern facility that is desperately needed by both the Church and the community of Bovingdon. I fully support the proposal.</p>
September Cottage 29 Chipperfield Road Bovingdon Hemel Hempstead Hertfordshire HP3 0JN	I support the application in principle as the church is in need of additional space and facilities, and have no objection to the design of the actual building but I do object to the application, as it stands, as I consider the external brickwork is not in keeping with the existing church building. The red brick appearance of the proposed extension clashes with the flint exterior of the Church. I feel this should match the Church and it would be more appropriate if the roof tiles also match those of the Church. Likewise the style of the proposed windows are out of character and should be the same as those of the Church. I consider a red brick extension would stick out like a sore thumb.
West Winds Bovingdon Green Bovingdon Hemel Hempstead Hertfordshire HP3 0LB	<p>I would like to support this application for an extension to the church.</p> <p>It is long overdue the toilet and the kitchen facility are very out of date and a new heating system (hopefully a Heat pump) would off set there carbon emission in becoming an Eco church.</p>
2 The Bourne Bovingdon Hemel Hempstead Hertfordshire HP3 0EN	We feel the exterior appearance of the brickwork is completely out of character with the materials of the existing church and we also dislike the colour of the roofing. The 'modern' extension does not tone in with the existing church. More consideration should be given in respect of matching colours and materials.