

6. FULL APPLICATION – MODIFICATIONS TO THE PATHWAYS, ALTERATIONS TO THE LEVEL OF THE ENTRANCE PORCH AND DOORS ; THE IMPLEMENTATION OF AN INTERNAL RAMP BETWEEN THE NORTH AND CHANCEL AISLE; AS WELL AS THE CREATION OF A SECOND DOORWAY IN THE NORTH CHANCEL AISLE AT PARISH CHURCH OF ST. LAWRENCE EYAM, CHURCH STREET, EYAM (NP/DDD/0420/0313 AM)

APPLICANT: REV MIKE GILBERT

Summary

1. The church of St Laurence; Eyam is a Grade II* building located within the centre of Eyam.
2. This application proposes alterations to the building and pathways within the site to provide level access through the south porch and a new emergency exit to the north elevation.
3. The application demonstrates that the development will conserve the significance of the church and its setting.
4. We recommend that the application is granted permission subject to conditions.

Site and Surroundings

5. The church of St Laurence; Eyam is a Grade II* building located within the centre of Eyam and within the designated conservation area.
6. There is pedestrian access to the site from a number of points along Church Street and from the church centre / rectory to the east. There are neighbouring residential properties to the west and south.

Proposal

7. Alterations to the church and its grounds to facilitate level access and provide a means of escape. The proposed alterations include:
 - Raising the level of pathways leading to the principal (south) entrance.
 - Raising the floor level within the south entrance porch to meet the new level of the pathway and thereby provide level access.
 - Extension of existing pathway to the rear of the church.
 - Formation of new doorway within the rear (north) elevation of the north aisle.
8. Alterations are proposed to the interior of the church, including the removal of the organ and introduction of an oak ramp. These works do not require planning permission.
9. The application originally proposed the replacement of the existing timber external doors to the south entrance porch with new glazed doors. The applicant has written to us to omit this element from the scheme.

RECOMMENDATION

That the application be APPROVED subject to the following conditions or modifications.

1. **Statutory three year time limit for implementation.**
2. **In accordance with submitted plans and specifications.**

3. **No development shall commence until a written scheme of investigation for a programme of historic building recording has been submitted and approved. No development shall take place until all on-site elements of the approved scheme have been completed. Within 12 week from completion of the development reporting shall be completed and provision made for publication, dissemination and archiving of results.**
4. **Notwithstanding the approved plans, no planning permission is granted for the removal or replacement of the existing external doors to the south porch.**
5. **Agree details of alterations to existing external doors to the south porch to facilitate raised floor level.**
6. **Agree details of new doors to north elevation including construction, finish and method of fixing.**
7. **Agree sample of stone type and dressing for the new north doorway.**
8. **Agree details of new mortars for bedding and pointing stonework (including proposed mortar mix(es) and joint profile).**
9. **Agree samples of flagstone paving and kerbs including dressing, coursing and joint profile.**
10. **Agree construction details and finish and method of fixing for new handrail.**

Key Issues

- The impact of the proposed development upon the significance of the Grade II* listed church and its setting.

Relevant Planning History

10. None relevant.

Consultations

11. Parish Council: No response to date.
12. District Council: No response to date.
13. Highway Authority: No response to date.
14. Historic England: *“Historic England has no objection on heritage grounds to the proposed new North door but has serious concerns as regards the impact of the preferred design for new outer South doors. We cannot support the preferred design for the outer South Porch doors and recommend that the applicants’ architect (in discussion with the DAC, the Local Planning Authority, ourselves and the Victorian Society) bring forwards alternative solutions which better sustain the significance of the church as a listed building.”*
15. Victorian society: Make the following comments:

“Broadly we are content with the proposed new entrance on the north side of the church, and on the disposal of the organ we are content to defer to more knowledgeable and specialist organisations, such as the BIOS and the CBC. The only aspect of the proposals with which we are not content – and which, on the basis of the information provided, we would have to oppose – is the proposed works to the south porch.”

The porch is, as the Statement of Significance underlines, a clear focus of the building – naturally so as its main entrance – and a major component of this most conspicuous and public aspect of the building. The prominence of the south porch, and the fact that all paths lead to it, in our view automatically renders it a more involving, inviting and welcoming structure than many porches can appear. In addition, few things are quite as effective at fostering a sense of welcome as leaving the outer doors propped open and a sign clearly erected stating the building is open and all are welcome to enter: a simple solution that the church, if it does not already, should certainly adopt. The present historic doors are fitted with pleasing ironmongery and their loss would be regrettable in fabric terms, quite apart from the impact their replacement would have on the character, appearance and experience of the porch.

We are not convinced by the notion that glass doors would render the entrance to St Lawrence's any more welcoming than it is already. Glass is not as transparent as people often assume, tending instead to reflect its surroundings (and light), and having a material presence that can be (and here would be) quite strident in the context of historic buildings and materials. It also presents an additional practical issue in that it can attract dust, grime and finger prints, which necessitates cleaning. Also thinking practically, visibility through two sets of glass doors placed a few feet apart would be almost nil. Indeed, the rationale for two sets of glass doors – inner and outer – is unclear. In addition, two-leaved doors, where one leaf is larger than the other, could look very odd indeed, and would fail to respond to the inherent symmetry and balance of the historic portals.

Proposals to provide level access into the church are acceptable. However, these do not necessitate the removal of Webster's porch doors (certainly not both of them), or their replacement with glass doors, which we consider would erode the character and appearance of the II listed building."*

16. PDNPA Built Environment: Makes the following comments:

"The building has medieval origins, and may possibly be earlier, and there is evidence of adaptation in the 16th and 17th centuries. However, the church was extensively rebuilt in the mid-19th century to the designs of the eminent Victorian architect, G. E. Street. In the 1880s, further alterations were carried out to the south aisle, porch and the belfry under the supervision of the Sheffield-based architect, J. D. Webster.

Four listed structures stand within the churchyard and one of these, the Anglian high cross, is scheduled. Clusters of buildings within the setting of St. Lawrence's Church are also listed. The site lies within the historic core of Eyam and its conservation area. The conservation area was designated on the 10th July 1981 and its boundary amended, and a character appraisal adopted, on the 2nd July 1993.

This planning application proposes alterations to the church and its setting to allow level access and improve the means of escape, thus providing access for all and improving provisions for the large number of worshippers and visitors. The proposed alterations include: (1) modifying the pathways that lead to the principal (south) entrance; (2) changing the floor level within the south entrance porch; (3) replacement doors to the south entrance porch; and (4) forming a new doorway within the north elevation of the north aisle.

Alterations are proposed to the interior of the church, including removal of the organ and the introduction of an oak ramp. However, these particular works do not require planning permission.

There is no objection to forming a new doorway within the north elevation of the north aisle or the works proposed to the setting of the listed building, as this part of the proposed works will not harm the significance of the listed building.

However, replacement of the outer timber doors to the south entrance porch will harm the significance of the listed building. This harm will not be outweighed by the other works proposed in this application and /or the public benefits.

This application is therefore contrary to local and national planning policy and Section 66 of the

Planning (Listed Buildings and Conservation Areas) Act 1990. I therefore strongly encourage the applicant to investigate the retention of the outer solid timber doors to the south porch.”

17. PDNPA Archaeology: Makes the following comments:

“The Church of St Lawrence, Eyam has significant archaeological interest due to the hidden information and concealed information relating to the development of the church within the building of the church itself. The site also has significant archaeological interest with respect to buried archaeological remains and features related to the development to the church and churchyard from the medieval period, medieval and later burial practices and any the development of the village.

Any such remains would be considered to be non-designated heritage assets of archaeological interest in their own right and will also contribute to the understanding and significance of the listed church and the listed and scheduled stone cross.

There are no concerns with respect to the proposals and the impacts upon buried archaeological remains and features. I welcome the level of thought that have been put into these proposals to ensure they are sensitive to the archaeological interest of the site and building by removing all groundworks and building up ground levels when changes of levels are required, and incorporating the required drainage within the raised levels. This means that there will be no harm to the below ground archaeological interest of the site.

However, the proposed changes, particularly with the installation of a new emergency exit, will result in irreversibly changes to the north wall and permanent loss of historic (Victorian) fabric and the design of this elevation. This will impact the archaeological and historic interest of the building resulting in harm to the significance of the listed building. From an archaeological perspective this harm is less than substantial.

The historic and architectural interest of the building, and the impact of or acceptability of the proposed changes are the key considerations for this proposals. I recommend that you are guided by the advice Historic England and the Building Conservation Officer with respect to these matters.

If with respect to the advice from Historic England and the Building Conservation Officer, and with respect to the planning balance, it is considered that the harm to significance of listed building and wider site is justified with respect to the balance of public benefit, then I recommend that an appropriate programme of historic building recording is secured by condition in order to mitigate the harm identified above.

This is required to ensure that a record is made of the church and the areas affected before the alteration and changes to its historic fabric and designed aesthetic, to mitigate the harm resulting from the proposed development and is in accordance with NPPF para.199. This needs to comprise a visual and descriptive record that makes use of the high quality drawn record provided by the ‘as existing’ architect’s drawings, and should be the equivalent of the Historic England Level 2/3 record. It needs to be undertaken by a suitably qualified and experienced historic building specialist/archaeologist to a written scheme of investigation that has been approved by the Senior Conservation Archaeologist.”

Representations

18. We have received 24 representation letters to date. 10 object to the application, 12 support and 2 make general comments. The reasons are summarised below.

Objection

- Object to the removal of the pipe organ from within the church.
- The proposed glass doors look out of character with the historic church and would be harmful.
- The existing outer doors should be re-used and left open when the church is open. The

doors should be retained as existing apart from any change due to the change in ground levels.

- The proposals would harm the significance of the historic building.
- The creation of a second doorway in the north walls seems over elaborate, particularly where there is an existing door via the vestry that could be widened.
- The applicant has not undertaken consultation with the local community.

Support

- The proposals would significantly improve accessibility for disabled people.
- Access for disabled people to the building is essential and overdue.
- These proposals strike a good balance between the preservation of the early elements of the building and most elements of (ill-considered) Victorian rebuilding with enabling access for all.
- The present heavy wooden doors most resemble prison doors. Doors with glass so that people can see inside will transform the appearance from 'forbidding' to 'welcoming'.

General comments

- Request that the planning process is delayed due to the current pandemic until such time that the proposals can be presented to the village as a whole so that residents can comment.

Main Policies

Relevant Core Strategy policies: GSP1, GSP2, GSP3, DS1, CC1 and L3

Relevant Development Management Plan policies: DMC3, DMC5, DMC6, DMC7 and DMC8

National Planning Policy Framework

19. National Park designation is the highest level of landscape designation in the UK. The Environment Act 1995 sets out two statutory purposes for national parks in England and Wales: Which are; to conserve and enhance the natural beauty, wildlife and cultural heritage and promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public. When national parks carry out these purposes they also have the duty to; seek to foster the economic and social well-being of local communities within the National Parks.
20. The latest version of the National Planning Policy Framework (NPPF) was published on 19 February 2019. The NPPF is a material consideration and carries particular weight where a development plan is absent, silent or relevant policies are out of date. In the National Park the development plan comprises the Authority's Core Strategy 2011 and policies of the Development Management Policies document 2019. Policies in the Development Plan provide a clear starting point consistent with the National Park's statutory purposes for the determination of this application.
21. In this case there is no conflict between our development plan policies and the NPPF Our development plan policies should therefore be afforded full weight in the determination of this application.
22. Paragraph 172 of the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage should also be given great weight in National Parks.
23. Para 190 of the NPPF states that Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available

evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

24. Para 192 of the NPPF states that in determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness.
25. Para 193 of the NPPF states that when considering the impact of a proposed development on 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 the 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.
26. Para 194 of the NPPF states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- b) grade II* listed buildings, should be wholly exceptional.
27. It is worth setting out that 'substantial harm' is harm which is very serious and is the greatest level of harm after total loss. 'Substantial harm' would often lead to irreversible loss of significance to a point where the designation is likely to be compromised. All other harm falls under the umbrella of 'less than substantial harm', and it is important that this is not underestimated as harm that falls into this category can still be very damaging cumulatively or in its own right. Para 196 of the NPPF states that where a development proposal will lead to less than substantial harm (but there is still 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.
28. Para 199 of the NPPF states that Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

Core strategy policies

29. GSP1 sets out the broad strategy for achieving our objectives having regard to the Sandford Principle. GPS1 also sets out the need for sustainable development and to avoid major development unless it is essential.
30. GSP3 sets out development management principles and states that all development must respect, conserve and enhance all valued characteristics of the site and buildings, paying particular attention to, amongst other elements, impact on the character and setting of buildings, scale of the development appropriate to the character and appearance of the National Park, design in accordance with the National Park Authority Design Guide and impact on living conditions of communities.
31. The Authority's conservation policies reflect the approach taken in the NPPF. Policy L3

says that development must conserve and where appropriate enhance cultural heritage assets and their setting and that other than in exceptional circumstances, development will not be permitted where it is likely to cause harm.

32. HC4 A says that the provision or improvement of community facilities will be encouraged within settlements listed in core policy DS1.

Development management policies

33. DMC3 sets out that where development is acceptable in principle, it will be permitted provided that its detailed treatment is of a high standard that respects, protects and where possible enhances the natural beauty, quality and visual amenity of the landscape, including the wildlife and cultural heritage assets. Particular attention will be paid to siting, scale, form, mass, landscape setting and the valued character and appearance of the area.
34. DMC5 makes the submission of a heritage statement with applications a policy requirement and reflects policies in the NPPF by requiring great weight to be given to the conservation of heritage assets, weighing harm against public benefits.
35. DMC7 and DMC8 say that applications affecting a listed buildings and conservation areas should be determined in accordance with DMC5 and clearly demonstrate how the significance of the affected heritage assets will be preserved and why the proposed development is desirable or necessary. DMC7 C. and D set out specific types of alterations to listed buildings that will not be permitted.
36. In considering whether to grant planning permission for the proposals we are obliged to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. We must give great weight to the desirability of conserving a designated heritage asset weighing against any public benefit where harm is less than substantial.

Assessment

Principle

37. A heritage statement has been submitted with the application. We have consulted Historic England, the amenity bodies and our conservation officer and senior archaeologist and all parties agree with the description of significance.
38. The building dates to the medieval period with fabric of the 13th and 15th centuries. The church was partially rebuilt in 1619 and later restored by Street in 1868-69 and J.D. Webster in 1882-83.
39. Four listed structures stand within the churchyard and one of these, the Anglian high cross, is a scheduled monument. Clusters of buildings within the setting of St. Lawrence's Church are also listed. The site lies within the historic core of Eyam and its conservation area.
40. The church of St Lawrence; Eyam is a Grade II* listed building and therefore is a designated heritage asset of more than special architectural and historic interest. Local and national planning policies are clear that while alterations to designated heritage assets such as listed buildings are acceptable in principle, development must conserve or enhance the significance of the affected heritage assets.
41. There is a very strong presumption against development that would have a harmful impact upon significance, unless the public benefits arising from the development outweigh the harm.

42. The church benefits from ecclesiastical exception, which means that the church is exempt from certain provisions of the planning acts, including the need to apply for listed building consent for church buildings used for worship. Historic England advise that the church has its own arrangements for handling changes to historic buildings which provide the same standards of protection as the secular system operated by local planning authorities.
43. A number of representations raise concerns about proposed internal works. However, this application is for planning permission only and therefore we can only consider the impact of development, which does not include internal works. The consideration of works that would normally require listed building consent is a separate matter for the church in consultation with Historic England.
44. The key issue therefore is the impact of the proposed development upon the significance of the church and its setting.

Impact of development

45. The development comprises two elements, the provision of level access through the south porch on the principal (south) elevation and the creation of a new emergency exit door and path to the rear (north) elevation.

Alterations to levels and porch on the principal elevation

46. The level of the surfacing adjacent to the south porch and nearby sections of five pathways would be raised to match the proposed floor level within the porch. The raised sections would have an asphalt surface with sandstone kerbs to match the existing. The level area in front of the door would be paved with stone flags over a concealed drain. The grass adjacent to the raised areas would be raised to avoid a step. The existing turf would be removed and replaced after additional topsoil is added.
47. The floor level within the porch would be raised to meet the level of the hardstanding. The existing historic stone flags would be left in place with a new stone floor bedded in a reversible mortar over the existing flags. The new flags would be cut around historic details including the plinths to the engaged columns that frame the main entrance.
48. The proposed works to raise the pathways would be undertaken over a relatively wide area and therefore the change in levels would have no significant visual impact and conserve the setting of the church and the conservation area. The proposed works to raise the floor level within the porch would not harm its significance or the historic detailing of the porch.
49. Therefore, there are no objections to this element of the proposals. If permission were, granted, conditions would be recommended to secure samples of the proposed flagstone paving and kerbs prior to installation. It is noted that the works to porch floor have been designed to be reversible without harm to the existing floor and this is welcomed.
50. The application originally proposed the replacement of the existing outer timber porch doors with new glazed doors. The applicant has omitted this alteration from the scheme following consultation responses from Historic England, the Victorian Society and our Conservation Officer objecting to their removal.
51. The application now only proposes modifications to the base of the doors to accommodate the raised level of the external path and porch floor. The modifications would also include raising the position of the lower hinges to suit. Maintenance works to the doors would be undertaken at the same time and existing modern signage removed. No works to mechanise the doors are proposed, the external doors would be kept fully open when the church is open to the public.
52. We advised the applicant that the removal and replacement of the external doors as

originally proposed would unacceptable harm the significance of the listed building. We welcome the revised proposals to omit this element and we have no objection to the proposals to retain the existing doors with minor modifications to the base.

53. If permission is granted, we would recommend a planning condition is imposed to ensure that the precise details of the alterations to the external doors are approved.

New emergency exit door and path to the rear elevation

54. A new door is proposed in the rear (north) elevation to provide an emergency exit. The applicant has been advised by building control that alterations to the existing church access would necessitate improving emergency exits within the building. The application demonstrates that the applicant has explored a number of alternatives, including altering the existing vestry doors. Following this process a new doorway within the north elevation of the north aisle was considered the least invasive approach.
55. Concern has been raised about the impact of the proposed new door in representations. Our Conservation Officer advises that since construction the church has undergone a series of remodelling and alterations and that the north elevation of the north aisle is asymmetrical in design. Therefore the principle of a door in the proposed location will not harm the significance of the building. Historic England and the Victorian Society have been consulted and raise no objection to the new doorway.
56. The proposed emergency exit will result in irreversible changes to the north wall and loss of historic fabric. This will result in some harm to the archaeological significance of the building. However, our Senior Archaeologist advises that the historic and architectural interest of the building and the impact of or acceptability of the proposed alterations are the key considerations and that the decision should be guided by advice from Historic England and our Conservation Officer.
57. Therefore, in accordance with advice from our Conservation Officer we conclude that the proposed new door opening would not harm the significance of the listed building or its setting. If permission is granted we would recommend conditions to agree samples of the new building stone, mortar mix, details of the proposed door and details of the new / re-sited downpipe currently located where the new door is proposed.
58. If permission is granted we would also recommend a planning condition to secure an appropriate programme of historic building recording in accordance with advice from our Senior Archaeologist and our conservation policies.
59. An extended path is proposed along the rear of the church to provide access to the new door. There is no objection to the proposed pathway subject to agreement of the proposed flagstone paving and handrail.
60. Overall, it is concluded that subject to conditions the proposed development would be less than substantial harm which conserve the significance of the church and its setting in accordance with our policies. The proposals would also significantly enhance accessibility for the public to an important community facility, this is welcomed and the public benefit offsets the less than substantial harm.
61. Given the location, scale and nature of the proposed alterations we have no concerns that the development would harm the amenity of any neighbouring property. The proposals would not harm highway safety.

Conclusion

62. The proposed development would conserve the significance of the Grade II* listed church and its setting.
63. Therefore having taken into account all matters raised we consider that subject to

conditions the development is in accordance with the development plan. There are no other material considerations that indicate that permission should be refused. The application is therefore recommended for approval subject to conditions.

Human Rights

Any human rights issues have been considered and addressed in the preparation of this report.

List of Background Papers (not previously published)

None

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