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Date: 5th July 2022  
Our Ref: 22/02543/PA05

Bath And Wells Diocese  
C/o Emma Brown

Dear Bath And Wells Diocese

**RE: Pre-application enquiry at Holy Trinity Church Church Street Paulton Bristol**

Thank you for your recent enquiry regarding the above proposal. Please find my response attached.

The views expressed in this report represent an officer's informal opinion only based on the information supplied and without consultation with statutory consultees or third parties. This advice is not binding on any future decisions made by elected members of the council or under powers delegated to other officers.

Should you chose to progress your scheme and submit further application(s) you may be able to benefit from setting up a Planning Performance Agreement to give you greater certainty of deadlines and outcomes. You will also get a dedicated Planning Officer and a mutually agreed timetable for your scheme to follow – all for a fixed upfront fee. See the website page [Planning Performance Agreements](#) for further information.

Your proposed works may need building regulation consent and should you choose to proceed you are advised to contact Building Control on tel: 01225 477517 or email: [building\\_control@bathnes.gov.uk](mailto:building_control@bathnes.gov.uk). Initial Building Control advice is provided free of charge.

I hope this is clear but should you require anything further, please do not hesitate to contact me on 01225 477642 or by email at [caroline\\_power@bathnes.gov.uk](mailto:caroline_power@bathnes.gov.uk).

Yours sincerely

Caroline Power  
Planning Officer  
Development Management



## **Pre Application Advice Report**

1	<b>Council:</b> Bath and North East Somerset	<b>Site Address:</b> Holy Trinity Church Church Street Paulton Bristol	<b>Ref No:</b> 22/02543/PA05
2	<b>Summary of your proposal &amp; officer view:</b>  Holy Trinity Church is in active use for worship. It is clear from the initial inspection of the Church that there is a need for change and adaptation of the interior to meet the needs of the growing congregation. However, this needs to be carefully weighed up against the impact on its significance by changes to the existing fixtures and fittings of unknown historic and/or architectural value.  As a grade II* listed building, Historic England has a wider remit than the Council and will comment on the proposed internal reordering and its relationship to the spatial qualities of the church interior at the appropriate stage in the process. However, we welcome the opportunity to take part in informal discussions regarding the potential reordering of Holy Trinity Church in Paulton and to be able to take part in the DAC visit.  Please see below our contribution towards the on-going informal discussions at this time for the proposed re-ordering scheme.		
3	<b>Officer assessment:</b>  Significance; The Church of the Holy Trinity was first listed in 1960 as grade II* with group value. Dating from 1757 and 1839, the latter by John Pinch. Historic England's list description picks up on its characteristic aisled interior that is synonymous with Perpendicular tradition- exemplified by the central nave and aisles separated by tall columns that exaggerate the feeling of height within the interior and complement the lancet windows. The description also notes the complete set of poppy-headed pews.  Since the church has been periodically enlarged on an incremental basis during the 19th century, the current church plan consists of an attractive and visually balanced large open interior, interrupted by the aisle pillars that subdivide the nave and aisles into 4 no bays. Whilst the different build phases can be discerned from outside, later alterations have been designed to achieve an architecturally harmonious church interior with a clear sense of hierarchy from the chancel with its ornate hammer-beam angels down to the gallery, enhanced by the uniformity of the church furniture with a variety of hand-carved poppy-heads. A Statement of Significance for the church's interior needs to provide an assessment of the level of significance that should be afforded to the various components that make up the churches fixtures and fittings, spatial character and plan.  The supporting documents give an account of the architectural evolution of Holy Trinity which have been helpful in an initial assessment of the character and significance of the church. However, it is clear that the final DAC application will need the section on significance refined to provide more in depth assessment of the current internal arrangements, including the age, quality and meaning of the seating and their embellishments, its contribution towards the interior's special interest, its location and impact on the spatial character of the church's interior and the composition of the pew decking and underfloor areas that will be exposed and how they will be treated  Seating Options; At present it is not possible to provide a formal view on the importance of the interior and its seating, as this relies to a large extent upon the Statement of Significance. Any proposals for change also need to be based on a realistic expectation of what the congregation is trying to achieve. For Holy Trinity, the description of need encompasses traditional wider aisle		

requirements, together with total flexibility to remove all the current fixed seating in favour of a hybrid form of traditional and new seating arrangements. Whilst some of the options show removal of the back sections of the pews, there are other options showing the majority of pews or all of them removed, including the upper gallery that I was unable to view at the time of visiting.

Presently, the poppy-headed pews form a positive contribution to the aesthetic quality of the interior and any new seating should continue to do so. Indeed, whilst the carvings may not be of the finest quality, their contribution adds a unique character to Holy Trinity, as individually bespoke carvings, reminiscent of medieval decorative carved finials of similar design. Due to the subtle differences between the individual poppyheads, it would be useful to understand if there is any hidden meaning in these differences such as those in Holy Trinity Church, Blythburgh, East Suffolk where some of those poppyheads represent the seven deadly sins. In addition, the "en-mass" contribution they make to the interior should not be under-estimated. Without them, the interior may become less rich or special with little else in the way of adornment present within the simple confines of the naves and aisles at this level.

Generally, as the Council's conservation team, we do not encourage wholesale replacement where retention, adaption or reordering is possible. Solutions can vary in the extent and type of change proposed and these options should be informed by an understanding of the building's capacity for change and expanded upon through the design stage of the process. It is reassuring to see that at this stage, a number of options are being indicated, although from the meeting it is clear that wholesale removal with some limited retention and adaptation to some of the pews is favoured. We welcome this chance to have some input into the process and would urge more consideration towards retention and less interference with the current layout, whilst recognising that the removal of the back section of pews would certainly enhance the practical use of the under gallery room for visitors/social events.

In terms of minimum intervention, shortening pews or removing a number would undoubtedly help to create a flexible space while retaining some of the overall appearance of the interior. However, the balance between the new and old still will still need to be achieved without detriment to either. Should sufficient justification be made for a more comprehensive reordering, then options that consider making the pews themselves shorter and moveable should be explored, as discussed at the meeting. Movement can be improved through the use of casters or rollers, however, I am not convinced that sliding them would be successful, thus leading to tendency for them to not be used at all.

Replacing seating can raise challenges, particularly regarding the design and finishes of new additions to ensure that they respond positively to the interior, harmonise successfully and do not detract from its spatial quality. There are also similar challenges to arranging for appropriate storage for any seating that does not impact negatively on the interior.

#### Potential Archaeology;

As part of the overall proposals to re-order the interior, it is understood that there is a future aspiration to investigate underfloor heating. This could have implications on any archaeological deposits that may still be present below the existing ground levels. A Desk-based assessment (D-ba) should be undertaken to support the application. The D-ba should help to identify the potential for archaeological remains on the site and identify the likelihood of structures and /or burials etc that may be impacted by the proposal. This might also be assisted by some initial physical investigation into the floor. The submitted information, however, does not identify the scale of impacts or significance of the proposed heating project.

#### Heating & Renewables;

There is little information available at this stage to provide direct comment other than what has been set out above. However, as a Council we are fully aware of the issues facing us all with Climate Emergency. As such the following link might be of assistance to adapt some of the guidance for the church;

<https://beta.bathnes.gov.uk/energy-efficiency-retrofitting-and-sustainable-construction-supplementary-planning-document-0>

	<p>The Council has a statutory requirement under Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 in considering whether to grant listed building consent for any works 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.</p> <p>With respect to any buildings or other land in a conservation area the Council has a statutory requirement under Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of that conservation area.</p> <p>The Revised National Planning Policy Framework (NPPF) 2021 is national policy in the conservation and enhancement of the historic environment which must be taken into account by the Council together with the related guidance given in the Planning Practice Guidance (PPG).</p> <p>The Council must have regard to its development plan where material in considering whether to grant listed building consent for any works.</p> <p>The statutory Development Plan for B&amp;NES comprises:</p> <ul style="list-style-type: none"> <li>- Core Strategy (July 2014)</li> <li>- Placemaking Plan (July 2017)</li> <li>- B&amp;NES Local Plan (2007) - only saved Policy GDS.1 relating to 4 part implemented sites</li> <li>- Joint Waste Core Strategy</li> <li>- Made Neighbourhood Plans</li> </ul> <p>Core Strategy: The Core Strategy for Bath and North East Somerset was formally adopted by the Council on 10th July 2014. The following policies of the Core Strategy are relevant to the determination of this application:</p> <ul style="list-style-type: none"> <li>- CP6 - Environmental quality</li> <li>- CP1 Retrofitting Existing Buildings</li> <li>- CP2 Sustainable Construction</li> </ul> <p>Placemaking Plan: The Placemaking Plan for Bath and North East Somerset was formally adopted by the Council on 13th July 2017. The following policies of the Placemaking Plan are relevant to the determination of this application:</p> <ul style="list-style-type: none"> <li>- HE1 Historic Environment</li> </ul> <p>Historic England Guidance (2019); Principles to making changes to historic places of worship.</p>
5	<p><b>Information we would like you to submit with a future planning application</b></p> <p>Not Applicable.</p> <p>Further guidance on the requirements can be found on the Council's website  <a href="http://www.bathnes.gov.uk/services/planning-and-building-control/apply-planning-permission">http://www.bathnes.gov.uk/services/planning-and-building-control/apply-planning-permission</a></p> <p>If you require further guidance on submission requirements please contact us on 01225 394041, option 5.</p>