
#LoveHoxton Project

Summary of Recent Progress in Response to Key Stakeholder Comments

Below is a table of all key stakeholder comments that have been issued since 2017. We have provided a response and status for each and feel that the vast majority of concerns have been mitigated or have a clear upcoming action seeking to resolve them. We have also attached the relevant #LoveHoxton project theme to each comment (CONSERVE, CONTRIBUTE, CREATE – also see Appendix 1).

In summary, the #LoveHoxton proposals have been developed considerably in response to comments from stakeholders and statutory consultees. The project has seen several exciting developments over the last couple of years. The key updates are:

Support for a Land Swap with St John the Baptist School (SJB)

One of the most significant developments has been to secure the support of SJB for the proposed land swap between the school and church. Following several consultations on the proposals we secured agreement from SJB, through a Memorandum of Understanding (Appendix 2), to support the land swap and partner with the project as the proposed designs developed, and the land swap was investigated further. Confirming the land swap will be subject to SJB's approval of the proposed design, but their openness to the option, and the recognition of the mutual community and heritage benefits, is a huge step forward. A letter of support as also been signed by SJB (Appendix 3). The land swap will potentially be the key to securing the long-term conservation of the Grade II* listed building, securing the optimum viable use of the designated heritage assets and their churchyard setting, the provision of affordable homes and other public benefits, and the overall success of the project.

Residential Housing – Relocation and Redesign

Following various concerns over the location and massing of the proposed affordable housing, Matthew Lloyd Architects (MLA) have relocated the residential housing to land that is currently occupied by SJB's sports pitch, ensuring that these new-build elements are located outside the curtilage of the listed building (see Appendix 4 for full MLA development proposal). The redesign would provide a significant number of genuinely affordable units, 27 in total, which is significantly higher than LB Hackney's policy requirement and attracts significant weight in planning terms. The impact on the setting of designated heritage assets has been significantly reduced by this change, and so too have the potential archaeological risks, because the housing would no longer occupy the churchyard as in previous iterations of the scheme.

In addition, the new location offers opportunities for incorporating additional facilities for SJB and the local community, including an indoor sports hall, outdoor sports pitch and a nursery.

Church Hall Extension – Removal of the proposed lower-ground floor and first floor connection

We have thoroughly evaluated the design of church hall extension in response to previous concerns raised regarding the visual, heritage and archaeological impacts of the previous design iteration. Although a full archaeological survey has not been undertaken at this stage due to financial constraints, we have benefitted from preliminary archaeological advice and guidance by Duncan Hawkins, Head of Archaeology and Heritage at RPS Group and Adam Single on behalf of Historic England (attached at Appendices 5 and 6, respectively).

We have also managed to significantly mitigate heritage impacts by removing a) the connection between the church and proposed extension at first floor; and b) the lower-ground floor level of the proposed extension. We do not believe this will be detrimental to the viability of the project as, on reflection, having additional space for co-working is no longer considered essential to the success of the scheme. This therefore reduces the need for additional space. Instead, we are considering how we can better utilise the crypt and its footprint.

Removing the basement significantly reduces the Proposed Development's financial and construction risk, and also the impact on historic fabric and archaeological remains. Moreover, it potentially reduces overall capital costs by an estimated £1,000,000.

Church Hall Extension - Raft over pile foundations

We have taken further steps to mitigate archaeological impacts by exploring the foundation options for the proposed Church Hall extension in consultation with Ed Morton (Conservation Engineer, The Morton Partnership) and Duncan Hawkins (Head of Archaeology, RPS). The outline investigations have surmised that a ground-bearing raft foundation should be possible subject to ground conditions, thereby removing the need for a piled raft (see Appendix 7). This is based on Duncan's professional view that human remains are likely to be sitting at a depth of 500mm below ground level, although this is subject to confirmation during investigative works.

As such we believe we can significantly limit disturbance to archaeological remains through the provision of a ground-bearing raft foundation. We believe this reduces the project risk far enough to satisfy the NHLF and release development funding for the undertaking of a detailed archaeological assessment and investigative works prior to submission of relevant applications for Planning Permission, Listed Building Consent and Faculty.

Additional Community Benefits – New Nursery and Indoor Sports Facilities

Part of the purpose for holding workshops with SJB was to find out more about their needs as a school. We learnt that a key gap in their provision is their inability to accommodate Early Years. MLA have reworked the housing scheme to accommodate a nursery with its own access and garden. The old AstroTurf sports pitch would be removed and a new 5:5 pitch provided. This would extend slightly onto land controlled by the Church, providing the school with additional space. In addition, the Proposed Development includes the provision of a new indoor sports hall for use by the school. This would also be hired out to the community – a significant public benefit which would provide the church with additional income. Both the indoor hall and sports pitch have been designed so that they can function securely and independently of the school grounds outside school hours, meaning the community would have new facilities available to them.

Preservation and Enhancement of the setting of Designated Heritage Assets

Efforts to preserve the setting of the Grade II* listed building and Grade II listed Railings and Gates within the Proposed Development have also been re-evaluated in response to feedback from stakeholders and statutory consultees. This extends beyond relocating the affordable housing and internal revisions to the proposed Church Hall extension.

One of the most significant revisions to the proposals is the removal of the concrete car park at the West Front of the church, a major detracting feature within the setting of designated heritage assets. This carpark would be replaced with the new 5:5 sports pitch, which would be partly located within the listed building's curtilage but retain the verdant, open character of the wider churchyard. This would not compromise key views and vistas towards the church building from within the churchyard or surrounding area. Whilst it is not possible to remove carparking spaces from the churchyard entirely, new hard-surfaced areas would be laid in an appropriate material, the number of carparking spaces reduced to a minimum, and the spaces positioned to avoid encroachment on the church building. These revisions represent both a heritage and community benefit.

Additionally, by virtue of a reduction in the overall footprint of the proposed Church Hall extension, the revised proposals mitigate the need to remove trees along the northern boundary and instead seek to creatively incorporate them into the landscape design. A new sympathetic and comprehensive landscaping scheme, including new public spaces, planting, and garden furniture, would enhance the churchyard setting of the heritage assets, retain key views and vistas and integrate the new-build elements with existing structures and spaces.



Findings

The project team and PCC are well aware that, as detailed in statute, policy and guidance, considerable planning weight is attached to proposals which harm the significance or setting of listed buildings. Equally, however, we recognise that works which preserve, enhance or better reveal the significance of listed buildings –and preserve or better reveal elements of setting that make a positive contribution to these assets– attract particular weight in the planning balance.

We also recognise that policy requires a balanced judgment to be made as to whether the overall effect of a package of proposals on designated heritage assets is one of net harm or net benefit. This is promoted by the NPPF, which makes clear that conservation is a dynamic process which manages change to heritage assets in a way that sustains, and where appropriate, enhances its significance.

Accepting these points, we believe that, when considered as a whole, the Proposed Development would preserve the special interest and setting of affected heritage assets and remain consistent with the continued ecclesiastical, public and community use of the listed church building, listed boundary railings and gates, and churchyard. The Proposed Development would also provide additional and much-needed Church and community facilities, facilitate a comprehensive schedule of repair and conservation works, provide additional school and community facilities (including a new nursery, indoor sports hall and outdoor sports pitch), and provide 27 affordable homes, amongst other benefits. The revised proposals would retain the verdant, open character of the churchyard, enhance the setting of the listed building, and integrate new-build elements with existing structures and spaces.

It is important to note that the public and heritage benefits of the Proposed Development (including the provision of affordable housing) exceed the policy requirements of the London and Local Plans, attract significant weight in the planning process and secure the optimum viable use of the designated heritage assets. Should any residual harm to the significance and setting of these assets be found, this would be overwhelmingly outweighed by these benefits, in line with the balancing provisions set out in paragraph 196 of the NPPF, and clearly and convincingly justified. Regardless, we remain committed to further design development and positive communication and consultation with statutory consultees, stakeholders, and the wider community. The proposals are put forward for consideration in this spirit.



Full List of Stakeholder Key Comments & Responses to Date (as of March 2020)

No.	Point Raised	Relevant Project Theme (Conserve, Contribute, Create)	Summary of Comments Received	SJH Response/Mitigation	Status (resolved, ongoing, unresolved)
Tim Walder – LB Hackney					
<i>March 2020 (Following Site Visit)</i>					
1.1	Potential Housing [Development] Partners	Contribute	TW suggested having a housing development partner on board at time of pre-application submission, with 'concrete partnerships' considered preferable, or to ask LB Hackney for advice on planning preference.	Whilst it is not possible to have a committed housing development partner at the time of the pre-application submission, SJH remain open to a housing partnership and have had preliminary discussions with a variety of stakeholders for both the development and future operation of the affordable housing units. These include Dolphin Living and the Hackney Parish Almshouses Charity.	Discussions ongoing
1.2	Pre-application Resubmission	Conserve, Contribute	TW recommended resubmitting the new proposals as a pre-application 'follow-up' submission. See correspondence at Appendix 8.	Resubmitted July 2020.	Resolved
Historic England					
<i>October 2019 (Following Site Visit)</i>					
2.1	Height and massing of the proposed flats/school hall building	Contribute	<ul style="list-style-type: none"> Proposed building considered 'relatively tall' for the surroundings; The proposed height could result in a diminution of the listed building's landmark 	Whilst the proposed housing/school hall represents an increase in the height and mass of built form compared to the existing, the shoulder-height of the development	Design development ongoing



			<p>quality by virtue of its proximity to the West Tower;</p> <ul style="list-style-type: none">• HE suggested it may be possible to set back the upper levels from the churchyard to mitigate 'overcrowding of the church tower' and create larger terraces for the flats.	<p>stands at part-four and part-five storeys, with the two upper storeys set back from the canted southern façade. As such, the upper levels are distinguished from the bulk of the building and their visual impact minimised. Similarly the fenestration detailing and materials would provide articulation to the facades and further reduce their perceived scale and mass. The contemporary design would be clearly distinguished from the historic building and its landmark status, and the ability to appreciate its significance and setting, preserved.</p> <p>As such, the height and massing of the proposed building are considered commensurate with the existing and emerging development context of the church, including the part-eight and part-six storey developments to the south and south-east respectively (consented under 2012/2915 in July 2014 and 2013/4005 in March 2014 respectively), and the 4-6 storey buildings further east along New North Road.</p> <p>Placing the height at the south-eastern end of the new block was also considered appropriate for a number of reasons, namely:</p> <ul style="list-style-type: none">• To avoid 'congestion' and design constraints arising from the adjacent four-storey residential	
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				<p>block to the north-west, which stands at a lower street scale;</p> <ul style="list-style-type: none"> To take advantage of the most advantageous aspect, views and daylight/sunlight orientation, in the same manner as the Dash London development at St Leonard's Court (Ref: 2012/2915, July 2014) <p>This being said, the design team take these comments on board and will seek to respond accordingly through the design development process.</p>	
2.2	Loss of significance to the Grade II listed Boundary Railings and Gates	Conserve	<ul style="list-style-type: none"> The community entrance of the Churchyard Railings and Gates [at New North Road] will require a short section of the Grade II listed boundary railings to be removed, causing some harm to their significance 	<p>The widening of the Gates and Railings at the existing entrance from New North Road is considered essential for the safe and effective operation of the listed building and proposed Church Hall. At present emergency access to the Church is restricted. Whilst the loss of historic fabric is regrettable, the fabric to be removed would be minimal, there is clear and convincing justification for its removal, and the overall significance of this asset would be preserved.</p>	Resolved
2.3	Boundary changes	Conserve	<ul style="list-style-type: none"> HE considered the legibility of the churchyard boundary to be important as an indicator of historic land ownership and the presence of burials. Recommended finding a creative way to record this boundary so that it can continue to be read. 	<p>Comments positively received – proposals will be developed in this regard prior to the submission of formal planning applications.</p>	Design development ongoing



2.4	Setting and landscaping	Conserve	<ul style="list-style-type: none"> The proposals are considered to alter the listed building's churchyard setting and restrict access to some areas (i.e. school playground and location for proposed Church Hall and sports pitch). Mitigation through landscaping enhancements to the churchyard would be welcome. Removing the car park presents real opportunities for enhancement to the setting of the listed building – commitment to design quality, improved landscaping and the legibility of historic boundaries will be required. 	<p>Comments positively received – proposals will continue to be developed in this regard prior to formal planning applications.</p> <p>The present proposals were revised to minimise changes to the churchyard setting. These changes included:</p> <ul style="list-style-type: none"> The removal of the concrete car park; The relocation of the housing/sports hall block; A reduction in the footprint of the proposed church hall extension; The provision of the sports pitch (open in character) The retention of key views and vistas; The retention of important trees; The provision of new high-quality hard and soft landscaping, including new public spaces, planting and garden furniture. <p>The revised proposals would retain the verdant, open character of the churchyard, enhance the setting of the listed building and integrate new-build elements with existing structures and spaces.</p>	Partly resolved and design development ongoing
2.5	Church Hall Extension – Design and materials	Create	<ul style="list-style-type: none"> HE welcome amendments to the extension – the scale is now considered much more subservient to the listed building with significantly reduced impact on its fabric and significance. 	<p>Recognition of the positive design developments welcomed – proposals will continue to be developed in this regard, and HE consulted, prior to the submission of formal planning applications.</p>	Partly resolved and design development ongoing



			<ul style="list-style-type: none"> • General direction now considered positive and continued consultation of design and materials welcomed. 		
2.6	Church Hall Extension – Burial remains	Conserve	<ul style="list-style-type: none"> • HE reiterated that both the secular and CofE policy position is that disturbing burial remains should only happen if there is no alternative option. HE made clear that the expected high density of human remains in churchyard, and their significance, means that works disturbing burial remains should be avoided. • HE reiterated the need for detailed with detailed assessments of engineering options and further details of the expected depth of overburden to the grave horizon • HE reiterated the desirability of pre-planning desk-based assessments and possible evaluation fieldwork to establish significance, assess potential degree of harm and inform mitigation measures. 	<p>The development proposals have benefitted from preliminary discussions and investigations carried out by the Morton Partnership and RPS and have been revised accordingly to respond to the concerns raised by HE and other stakeholders. As such, a ground-bearing raft foundation has been incorporated into the design, considered the least intrusive measure for the proposed Church Hall extension.</p> <p>Additionally, the proposals no longer include a lower-ground floor level within this building. Together, these revisions significantly reduce potential disturbance to human remains (and the associated financial and construction risk).</p> <p>We believe these revisions reduce the project risk far enough to satisfy the NHLF and release development funding for the undertaking of a detailed archaeological assessment and investigative works prior to submission of relevant applications for Planning Permission, Listed Building Consent and Faculty. The findings of these assessments and investigations will inform the final design proposals.</p>	Partly resolved and design development ongoing
2.7	Reordering – Chancel furnishings, Choir stalls and Sanctuary steps	Conserve	<ul style="list-style-type: none"> • HE stated that the Chancel furnishings contribute to the significance of the listed building and they would not support 	The Choir stalls will be retained and the proposed alterations to the Chancel furnishings and Sanctuary will continue to be	Design development ongoing



			<p>alterations to this area in the manner previously proposed.</p> <ul style="list-style-type: none">• HE stated that high-quality choir stalls should be retained and recommended revisions to their proposed relocation, such as placing them at the east end of the aisles.• The proposed alterations to the Sanctuary steps were considered harmful and HE stated that they should not be altered other than for cleaning [and repair works].	<p>developed, in consultation with HE and other stakeholders, in light of the comments received.</p>	
2.8	Other internal fixtures and fittings – Pulpit, Font and new baptismal pool	Conserve	<ul style="list-style-type: none">• The retention of the pulpit at ground level within the main volume of nave was welcomed.• The potential impact of a baptismal pool within the central aisle on the floor build-up should be considered.• The Victorian Font should be retained and shown on the plans	<p>The Pulpit and Font will be retained, with the Font likely reinstated in its original location by the South-West window, within the new family/crèche area. This is a heritage benefit. The inclusions of the baptismal pool was an error on the plans and is no longer included.</p>	Partly resolved and design development ongoing
2.9	North Aisle Windows	Create	<ul style="list-style-type: none">• HE stated they have no objection in principle to the removal of the two plain windows in the north aisle to provide access to the new Church Hall extension. HE recognised that this approach was chosen to minimise harm to the significance of the listed building.• HE recommended that the proposed doors should use materials and detailing to complement the traditional appearance of the church.	<p>Recognition of the positive design developments welcomed – proposals will continue to be developed in this regard.</p>	Design development ongoing
2.10	Lift installation	Create	<ul style="list-style-type: none">• HE stated they have no objection in principle to the inclusion of a lift at the centre of the north gallery staircase providing this has no impact on the stair's historic fabric.	<p>Recognition of the positive design developments welcomed – proposals will continue to be developed in this regard.</p>	Design development ongoing

			<ul style="list-style-type: none"> HE welcomed further detail on the proposed appearance and connections to different levels in due course. 		
2.11	Historic External Doors	Conserve	<ul style="list-style-type: none"> HE considered the proposed replacement of the historic external doors with external glass doors to be harmful to the architectural interest of the listed building HE stated that the retention of the historic doors and the installation of a glass lobby could be an acceptable alternative. 	Comments positively received – the historic external doors will be retained and repaired with proposals for secure internal glass lobby and doors developed prior to the submission of formal planning applications.	Partly resolved and design development ongoing
St John the Baptist School					
March 2019 (Letter of Support)					
3.1	Letter of Support	Conserve, Create, Contribute	Fully supportive of the objects of the #LoveHoxton development as summarised in the church's latest project boards: CONSERVE, CREATE, CONTRIBUTE. Welcomed the opportunity to work closely with the church to make a positive difference in local neighbourhood.	Letter drafted.	Resolved
3.2	Design Development	Contribute	<p>SJB stated they would welcome the opportunity to discuss the following in further detail as proposals develop:</p> <ul style="list-style-type: none"> The site access for contractor vehicles; The maintenance costs of the new building; The site management plans for facilities' use outside of school hours; The impact of the development on light and heat to the existing school building; The provision of toilet/changing spaces for the new sports hall; 	Comments positively received – the design team and church remain committed to positive communication and consultation with SJB. The detail of these queries will be worked out in close partnership during the detailed design phases. A Memorandum of Understanding with words to this effect is attached with these pre-application documents.	Partly resolved and design development ongoing

			<ul style="list-style-type: none"> The business plan models for the provision of new nursery spaces. 		
Hackney Planning <i>December 2018 (Email from Toyin Omodara)</i>					
4.1	Updated Pre-App Submission	Conserve, Contribute, Create	LB Hackney strongly advised a Planning Performance Agreement is entered into due to the complexity of the project.	It is not financially viable for the church to enter into this agreement. The design team and church remain committed to positive communication and consultation with LB Hackney and subsequent conversations with the Planning Team and Tim Walder have concluded it is appropriate to submit the revised proposals for pre-application follow-up advice. Tim Walder was encouraging of this approach.	Resolved
St John the Baptist School <i>November 2018 (Consultation Workshops)</i>					
5.1	Memorandum of Understanding	Contribute	SJB agreed to sign MoU as a partner in the project, on the understanding that there is still design development to be done.	Produced and signed by the school. Both parties remain committed to positive communication and consultation to bring about shared and community benefits.	Resolved
5.2	Nursery provision	Contribute	SJB is keen to develop nursery provision, preferably separate from the main school building, with dedicated outdoor space	Comments positively received – the proposals have been updated to reflect this need, with the ground floor of the new residential building partly given over for early years provision, with outdoor play area, and separate access and toilets. This is a significant public benefit.	Resolved
5.3	Indoor sports hall	Contribute	Preference for a sports hall at bottom of residential building as this allows for both school and community use.	Comments positively received – the proposals have been revised and updated to include an indoor sports hall (based upon	Resolved

				the size of a basketball court) at ground floor. This would be a significant public benefit and frees up additional teaching space within the school building through the redevelopment of SJB's existing sports hall.	
5.4	Sqm net loss	Contribute	SJB raised concerns that the previous proposals appeared to show a net loss of floor space from the school grounds	Proposed Development revised and updated to ensure this does not happen and the land controlled by the school now representing a net gain. The outdoor sports pitch has been increased in size, reoriented, and additional space given over to school on the north side of the Church. These alterations and configurations relate better with the church building in this way.	Resolved
5.5	Sports pitch	Contribute	SJB asked for confirmation that this was the correct size for a '5-a-side' football pitch.	Project team confirmed the updated pitch size can accommodate '5-a-side' football.	Resolved
5.6	Privacy/safeguarding	Contribute	SJB raised a concern of children being able to see into the new flats, and potential safeguarding issues.	This has been addressed as a priority within the Proposed Development, and concerns regarding overlooking and amenity will be thoroughly tested, mitigated and resolved through the design development process.	Partly resolved and design development ongoing
5.7	Upkeep costs	Contribute	Concerns over maintenance costs for the school	This is to be investigated. These concerns will be resolved through conventional legal and planning agreements as standard. The project team note that the sports hall will be a source of income generation, which would help to cover any maintenance costs.	To be resolved in due course
5.8	Wooden climbing frame	Contribute	SJB stated that the children love the school climbing frame and this will need to be relocated.	Climbing frame appropriately relocated within the Proposed Development to the immediate north of the proposed Church	Resolved



				Hall extension (on land controlled by the church)	
National Lottery Heritage Fund					
<i>Early 2018 (Phone call following Round 1 funding decision)</i>					
6.1	Development consents/match funding	Contribute	NHLF raised concerns regarding the risks in gaining relevant planning consents and the associated impact upon project finances and match-funding.	<p>The Proposed Development has undergone a comprehensive design development process already, with further meaningful consultation carried out with community stakeholders and statutory consultees through the design development process.</p> <p>As such the proposals have been extensively revised in light of the comments received and the project team, PCC, congregation and community supporters strongly believe that the revised proposals have reduced risks as far practically possible and increased the public, heritage and community benefits significantly.</p> <p>This view is supported by the positive conversations had to date with potential housing development partners, the local authority, statutory consultees and community stakeholders. The project team are confident of obtaining the relevant consents in good time and within the projected budgets.</p>	To be resolved in due course
6.2	Hackney pre-application response		Negative pre-app response from Hackney	As detailed above at 6.1. The concerns of LB Hackney have been fully considered and significant efforts made to address them. All indications suggest that revised proposals will be positively received by LB Hackney.	Partly resolved and to be fully resolved in due course



6.3	Historic England response		Negative response from Historic England in relation to the enabling residential development	As detailed above at 6.1. The concerns of HE have been fully considered and significant efforts made to address them – the most recent consultation response from HE (October 2019) was positive with regard to the residential development, and indeed other design proposals, and recognised the considerable steps taken in response to concerns raised.	Partly resolved and to be fully resolved in due course
6.4	Housing location / impact	Conserve, Contribute	<ul style="list-style-type: none"> • The introduction of housing to the churchyard will privatise sizeable areas of this public space • This housing will alter the character of the space around it. • Access for private parking and facilities needed for domestic environments will alter the character of the historic churchyard • The boundary between the communal gardens of a private housing block, and the public space of a churchyard will be jarring and result in loss to the existing coherent character. 	As described above at 2.4, these concerns have been substantially addressed through extensive revisions to the Proposed Development, including the land swap, revised designs for the Church Hall extension and housing/sports hall block, the provision of an outdoor sports pitch and the inclusion of high-quality hard and soft landscaping. The revised proposals would retain the verdant, open character of the churchyard, enhance the setting of the listed building and integrate new-build elements with existing structures and spaces.	Resolved
6.5	Boundaries	Conserve, Contribute	<ul style="list-style-type: none"> • The new buildings will also create a property line along the north edge of the churchyard. • There will be difficulty in appreciating the church as having been deliberately constructed with space all around 	The revised proposals have reduced the footprint of the proposed Church Hall extension along the northern boundary and relocated the residential/sports hall block outside of the curtilage of the listed building through the land swap. With regard to the legibility of the boundaries the proposals will be developed in this regard prior to the submission of formal planning applications.	Partly resolved and to be fully resolved in due course
Historic England					

November 2017 (Letter from Matthew Cooper)					
7.1	Archaeology	Conserve	HE considered the foundations and groundworks of the proposals were likely to heavily impact the significant number of remains within the churchyard.	As detailed above in section 2.6 – concerns and disturbance to burial remains reduced as far as possible through the use of a ground-bearing raft foundation and the removal of the lower-ground floor proposal for the new extension in favour of the existing footprint and crypt of the listed building.	Partly resolved and design development ongoing
7.2	Archaeological survey	Conserve	HE recommended commissioning a specialist desk-based archaeological study in advance of the submission of formal planning applications.	As detailed above in section 2.6 – preliminary discussion with RPS and the Morton Partnership have informed the foundation options for the proposed development and a full archaeological assessment and associated investigative works will be carried out prior to the submission of formal planning applications.	Partly resolved and design development ongoing
7.3	New housing	Conserve, Contribute	Most serious obstacle – churchyard never been built on and the setting defines the church. Housing will privatise large areas of the churchyard and change the character of the landscape.	As detailed above in section 2.4 and 6.4 – the revised proposals have relocated the residential/school hall building outside of the listed building's curtilage through a land swap, and the proposals significantly revised to minimise changes to the churchyard setting.	Resolved
7.4	Church Hall extension	Create	<ul style="list-style-type: none"> HE stated that the Church Hall extension as then proposed represented new built form on previously undeveloped land, however they accepted that many church halls are built. HE considered the location for the new extension to be well-considered and the least visually obtrusive option. 	As detailed above in section 2.4 and 2.5 – comments positively received and the proposed design for the church hall revised accordingly. The footprint, scale and massing of the proposed Church Hall extension has been reduced in size. This has been positively received by HE and is considered to significantly reduce the	Partly resolved and design development ongoing

			<ul style="list-style-type: none"> HE raised concerns over the form and size of the extension 	<p>impact of the Proposed Development on the listed building's fabric and significance. The proposals will continue to be developed in this regard, and HE consulted, prior to the submission of formal planning applications.</p>	
7.5	Internal reordering	Conserve	<ul style="list-style-type: none"> HE stated that the removal of the pews could be considered acceptable, however the choir stalls should be retained due to their significance HE stated that the relocation of the organ could be considered acceptable but close consultation with Diocesan organ specialist is advised. 	<p>As detailed above in section 2.7 – the choir stalls will be retained and the proposed internal alterations will continue to be developed in light of the comments received. The revised proposals no longer seek to relocate the organ which will be retained in situ.</p>	Partly resolved and design development ongoing
DAC					
<i>October 2017 (Site Visit Notes)</i>					
8.1	Church Hall Extension	Conserve, Create	<ul style="list-style-type: none"> DAC raised concerns regarding the form of the proposed extension. The DAC stated that the connection between the new extension and main church building would require carefully consideration and any link at the first floor gallery level was to be avoided. 	<p>As detailed above in sections 2.4 and 2.5 – comments positively received and the proposed design for the church hall revised accordingly. The footprint, scale and massing of the proposed Church Hall extension has been reduced in size and the previously proposed link at the first floor removed. Additionally the lower-ground floor level has been removed in favour of utilising the existing crypt.</p>	Resolved
8.2	Pews and Choir stalls	Conserve	<ul style="list-style-type: none"> The removal of the majority of the surviving Victorian pews could be mitigated through the retention of the choir stalls. Without the choir stalls the church will no longer have a formal chancel environment. 	<p>As detailed above in section 2.7 – the choir stalls will be retained and the proposed alterations to the Chancel will continue to be developed, in consultation with the DAC and others, in light of the comments received.</p>	Partly resolved and design development ongoing



8.3	Pulpit and other internal fixtures and fittings	Conserve	The DAC recommended the retention of the pulpit alongside the other traditional fittings at the east end, as it is already on wheels and can be moved around.	As detailed above in sections 2.7 and 2.8 – the pulpit will be retained and the proposed alterations to the Chancel will continue to be developed, in consultation with the DAC and others, in light of the comments received.	Partly resolved and design development ongoing
8.4	Land swap	Contribute	The DAC encouraged the development of the land swap option as it was considered more likely to reach a successful compromise.	As detailed above at 5.1 - comments positively received and proposals revised accordingly. A MoU has been signed with the school and they remain supportive of the land swap plans, subject to further collaborative design development. Both parties recognise the shared public, heritage and community benefits that this would bring.	Resolved
8.5	Enhanced Advisory Services	Conserve, Contribute, Create	DAC advised removing the problematic elements of the scheme identified and engaging in their enhanced advisory services.	<p>The Proposed Development has undergone a comprehensive design development process already, with further meaningful consultation carried out with community stakeholders and statutory consultees through the design development process.</p> <p>As such the proposals have been extensively revised in light of the comments received and the project team, PCC, congregation and community supporters strongly believe that the revised proposals have reduced risks as far practically possible and increased the public, heritage and community benefits significantly.</p> <p>This view is supported by the positive conversations had to date with potential housing development partners, the local</p>	Resolved



				authority, statutory consultees and community stakeholders. The design team and church remain committed to positive communication and consultation with the DAC.	
8.6	Project phasing and funding	Conserve, Contribute, Create	The DAC stated that they advise dividing the individual project components into phases to reduce risk and maximise the grant funding.	<p>As detailed above, the proposals have been extensively revised in light of the comments received and the project team, PCC, congregation and community supporters strongly believe that the revised proposals have reduced risks as far practically possible and increased the public, heritage and community benefits significantly.</p> <p>We believe these revisions will satisfy the NHLF and release development funding for the undertaking of the detailed design phases in order to obtain the necessary consents, for all elements, under unified applications for Planning Permission, Listed Building Consent and Faculty.</p> <p>The intention is to receive positive pre-application responses at this stage, for all elements of the Proposed Scheme, and then to progress to formal planning submissions in due course. The construction works themselves would be carried out in phases, one after the other, with the housing/sports hall block built out first to release match-funding for the remaining works (to follow immediately), as considered acceptable in principle by the NHLF. This would reduce the associated risks further and maximise the</p>	Resolved



				effectiveness of the match funding for the successful and comprehensive implementation of the scheme.	
8.7	Detailed Assessment	Conserve, Contribute, Create	<ul style="list-style-type: none">The DAC considered detailed assessments were required at pre-planning stage to understand the impact of the works on the church and the setting.Stated there was some concern about the pace of the project and the need for comments to be received from the various stakeholders and responded to.	<p>As detailed above, the proposals have been extensively revised in light of the comments received and the project team, PCC, congregation and community supporters strongly believe that the revised proposals have reduced risks as far practically possible and increased the public, heritage and community benefits significantly.</p> <p>We believe these revisions will satisfy the NHLF and release development funding for the undertaking of the detailed design phases and assessments required to obtain Planning Permission, Listed Building Consent and Faculty.</p>	Resolved
8.8	Extension foundations	Conserve, Create	The DAC asserted that the insertion of a subterranean concrete framed building all will need significant financial input after 10 years and massive investment after 20.	As detailed above in section 2.6 – the proposals have been revised in response to comments received from the DAC and other statutory consultees. As such, a ground-bearing raft foundation has been incorporated into the design for the proposed Church Hall extension and the proposals no longer include a lower-ground floor level within this building. Together, these revisions significantly reduce potential disturbance to human remains (and the associated financial and construction risk).	Resolved
8.8	Loss of open space	Conserve	The DAC stated that the previous proposals would result in a significant loss of open space and asked	As described above at section 2.4, these concerns have been substantially addressed through extensive revisions to the Proposed	Resolved



			how this loss would be balanced by broad public benefit (beyond the social housing)	<p>Development, including the land swap, revised designs for the Church Hall extension and housing/sports hall block, the provision of an outdoor sports pitch and the inclusion of high-quality hard and soft landscaping. The revised proposals would retain the verdant, open character of the churchyard, enhance the setting of the listed building and integrate new-build elements with existing structures and spaces.</p> <p>It is important to note that the public and heritage benefits of the Proposed Development (including the provision of affordable housing) exceed the policy requirements of the London and Local Plans, attract significant weight in the planning process and secure the optimum viable use of the designated heritage assets. Should any residual harm to the significance and setting of these assets be found, this would be significantly outweighed by these benefits, in line with the balancing provisions set out in paragraph 196 of the NPPF.</p>	
8.9	Archaeological assessment required	Conserve	<ul style="list-style-type: none">• The DAC expressed the view that human remains represent a significant cost not yet convincingly assessed.• The DAC stated that a more comprehensive archaeological assessment is needed to broad gain support and allow viability to be assessed.	<p>As detailed above at section 2.6 – concerns and disturbance to burial remains reduced as far as possible through the use of a ground-bearing raft foundation and the removal of the lower-ground floor proposal for the new extension in favour of the existing footprint and crypt of the listed building.</p>	Partly resolved and to be fully resolved in due course



				Preliminary discussion with RPS and the Morton Partnership have informed the foundation options for the proposed development and a full archaeological assessment and associated investigative works will be carried out prior to the submission of formal planning applications.	
8.10	Professional archaeological advice	Conserve	The DAC suggested that an archaeological adviser with a proven record of dealing with human remains should be engaged through all phases	As detailed above at section 2.6 – preliminary discussion with Duncan Hawkins, Head of Archaeology and Heritage at RPS, and Ed Morton, Conservation Engineer at the Morton Partnership, have informed the foundation options for the proposed development and a full archaeological assessment and associated investigative works will be carried out prior to the submission of formal planning applications.	Resolved
8.11	Space audit	Create	The argument for the new parish hall building would be strengthened by a full and detailed audit of the existing spaces	The revised proposals have removed the proposed lower-ground floor for the new extension in favour of better utilising the church's existing footprint and crypt. We feel the need and justification for the extension (and indeed the conservation works and social housing) is clear and convincing. Both the need and justification will be set out comprehensively in the forthcoming NHLF grant application and in submissions for Planning Permission, Listed Building Consent and Faculty, including the required Statement of Need. We feel this negates the need for a space audit.	Resolved



	Relationship of the Church Hall extension and Nave	Conserve, Create	The DAC asked the project team to consider alternative arrangements for the proposed hall and the relationship to the nave	<p>As detailed above in sections 2.4 and 2.5 – comments positively received and the proposed design for the church hall revised accordingly. The footprint, scale and massing of the proposed Church Hall extension has been reduced in size and the previously proposed link at the first floor removed. Additionally the lower-ground floor level has been removed in favour of utilising the existing crypt.</p> <p>These design developments have been well-received by Historic England and other stakeholders, and the DAC will continue to be consulted in this regard prior to the submission of formal planning applications. The design team and church remain committed to positive communication and consultation with the DAC.</p>	Resolved
Hackney Planning <i>2017 (email from Tim Walder)</i>					
9.1	Setting	Conserve	LB Hackney considered it unlikely that the previous iteration of the proposals would be acceptable in principle on the grounds of the substantial harm to the church and its setting.	<p>As described above at section 2.4, the proposals have been extensively revised in light of the comments received and the project team, PCC, congregation and community supporters strongly believe that the revised proposals have mitigated harm to the significance of designated heritage assets and their setting as far as practically possible and increased the public, heritage and community benefits significantly.</p> <p>It is important to note that the public and heritage benefits of the Proposed</p>	Resolved



				Development (including the provision of affordable housing) exceed the policy requirements of the London and Local Plans, attract significant weight in the planning process and secure the optimum viable use of the designated heritage assets. Should any residual harm to the significance and setting of designated heritage assets be found, this would be significantly outweighed by these benefits, in line with the balancing provisions set out in paragraph 196 of the NPPF.	
9.2	Trees	Conserve	The proposed extent and nature of the impact on trees in the churchyard was considered unlikely to be acceptable in principle	As described above at section 2.4, the revised proposals mitigate the need to remove trees along the northern boundary through a reduction in the overall footprint of the proposed Church Hall extension. The revised proposals instead seek to creatively incorporate these trees into the landscape design. A new sympathetic and comprehensive landscaping scheme, including new public spaces, planting and garden furniture, would enhance the churchyard setting of the heritage assets and integrate the new-build elements with existing structures and spaces.	Resolved
9.3	New building works	Conserve, Contribute, Create	LB Hackney stated that the previous iteration of the proposals included three main new-build element: residential flats, staff accommodation and a new church hall. Given the heritage and arboricultural constraints, this was considered too much for the site, and LB Hackney suggested	As described above at 2.4, these concerns have been substantially addressed through extensive revisions to the Proposed Development, including the land swap, revised designs for the Church Hall extension and housing/sports hall block, the	Resolved and design development ongoing



			focusing only on the proposed Church Hall extension.	removal of the previous Vicarage development and the inclusion of high-quality hard and soft landscaping. The revised proposals would retain the verdant, open character of the churchyard, enhance the setting of the listed building and integrate new-build elements with existing structures and spaces.	
9.4	Underuse of the Crypt	Create	<ul style="list-style-type: none"> • LB Hackney stated that further consideration should be given to the Crypt. • The council stated that the footprint of the Crypt appears to be as large as the church and includes areas currently sealed which may be capable of being opened up • The creation of a hall within this space may be possible with structural work – these changes would be likely be acceptable in heritage terms. 	<p>As detailed above in sections 2.4 and 2.5 – comments positively received and the proposed design for the church hall revised accordingly. The footprint, scale and massing of the proposed Church Hall extension has been reduced in size and the lower-ground floor level removed in favour of utilising the existing crypt. Design development regard the use of this space is ongoing.</p> <p>Successive design reviews have shown that the creation of a hall within the crypt is not practical or cost-effective due to the low ceiling height, prevalence of supporting columns and the removal of historic fabric and structural intervention required.</p> <p>These design developments have been well-received by Historic England and other stakeholders, and LB Hackney will continue to be consulted in this regard prior to the submission of formal planning applications.</p>	Resolved
9.5	Location of church hall	Conserve, Create	LB Hackney stated that further consideration could be given to a hall with basement, ground and possibly first floor level on the northern side of the	These comments were positively received and the suggested location for the proposed Church Hall extension adopted. The	Resolved



			church. This suggestion was dependent on the impact on nearby trees.	footprint, scale and massing of the proposed Church Hall extension has since been reduced in size, the previously proposed link at the first floor removed, and the lower-ground floor level removed in favour of utilising the existing crypt. These revisions mitigate the need to remove trees along the northern boundary and seek to creatively incorporate them into the landscape design.	
9.6	Car park / landscaping	Conserve	LB Hackney considered the car park to be the most harmful existing use within the site, and made clear that development proposals should include landscaping enhancements which eliminate or reduce the size of the car park and move parking away from the West Front.	<p>As described above at 2.4, these concerns have been substantially addressed through extensive revisions to the Proposed Development, including the removal of the concrete car park, the provision of an outdoor sports pitch and the inclusion of high-quality hard and soft landscaping. The revised proposals would retain the verdant, open character of the churchyard, retain key views and vistas, enhance the setting of the listed building and integrate new-build elements with existing structures and spaces.</p> <p>Whilst it is not possible to remove carparking spaces from the churchyard entirely, new hard-surfaced areas would be laid in an appropriate material, the number of carparking spaces reduced to a minimum, and the spaces positioned to avoid encroachment on the church building. Overall the revisions to the Proposed Development represent both heritage and community benefits.</p>	Resolved