


The Early Nineteenth-Century Unitarian Campaign to change English Marriage Law

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The 1836 Marriage Act has received surprisingly little attention from historians of Dissent, despite its significance in permitting non-Anglicans to conduct legally recognized marriages according to their own ceremonies in Dissenting places of worship. The Clandestine Marriages Act (1753), better known as the Hardwicke Act, had limited valid marriages to the rites of the Church of England. Only Jews and Quakers were exempt. By the early nineteenth century the Anglican marriage service was objectionable to Unitarians because of the references to the Trinity. The struggle to change the Marriage Act was initiated by the Freethinking Christians, who engaged in a controversial and highly visible public protest during the marriage service. They successfully engaged the broader Unitarian movement in their campaign, who through the medium of the Unitarian Association undertook a remarkable, though largely fruitless, struggle to change the law until joined by the rest of Dissent in the early 1830s.

On Sunday 14 January 1827, at nine o'clock in the morning, Mr Lionel Trotter and Miss Agnes Campbell attended their parish church of St George the Martyr in Queen Square, Holborn, London, in order to be married. Trotter, his bride and the other members of the bridal party were Freethinking Christians. When the officiating minister, the Rev. John Holt Simpson, appeared at the altar, Trotter presented him with a paper of protest, stating that he and his bride were forced to submit to the marriage service of the Church of England, though 'contrary to their belief, as the only means of obtaining a legal marriage. Upon briefly glancing at the paper, Simpson said 'I refuse to marry the parties', and though called upon to perform his duty, left the altar. The wedding party

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remained at the front of the church during the whole of the morning service. This, together with their refusal to take part, or, like the rest of the congregation, to wear mourning for the late Duke of York on conscientious grounds, made their behaviour even more striking.¹

At the conclusion of the service, and before the administration of the sacrament, they were informed by the churchwardens that the legal hour for celebrating marriage had now passed. They were asked to attend the minister in the vestry, which they found filled with parish officers and members of the congregation. Among them was George Marriott, the well-known barrister and police magistrate. Trotter told Simpson that he had broken the law by his refusal. The person acting as the father to the bride likewise told Simpson: 'you have acted, Sir, unlawfully, in denying a civil right to these parties', and demanded to know whether Simpson would be willing to perform the service at ten on the following day. After what appears to have been a lengthy argument, Simpson was finally called upon for his decision. He deferred to Marriott, who confirmed that Simpson would be present to perform the service, provided that the bridal party was prepared to go through with it: 'to say all that other parties say, and not to say any thing that other parties do not say, and not to offer any obstruction'. Without agreeing to the conditions, the bridal party denied they had been obstructive and declared their intention of attending the next day.²

Presenting themselves the following morning at the vestry, they were accompanied by Samuel Thompson, who declared that he was the elder of the Freethinking Christian Church. They believed, he said, in 'one living and true God, and in his son, the *man* Jesus'. They had been 'compelled to act as they had done, in order to guard our consciences from violation'. He was interrupted by Marriott, and after Thompson had made a further statement about being persecuted for their faith, Marriott asked if the party would silently conform to the ceremony. Thompson replied that if the minister did his duty, they were 'prepared to act in the sight of God'.³ The party then

¹ The incident was very widely reported, largely based on an account the Freethinking Christian Church provided. The following report is derived from 'Dissenters' Marriage', *Morning Chronicle*, 15 January 1827, 3; *Morning Post*, 16 January 1827, 4; *The Times*, 16 January 1827, 2–3. Simpson is not identified in the accounts, but see *Morning Advertiser*, 24 September 1835, 4.

² *Ibid.*

³ *St James's Chronicle*, 16 January 1827, 3.

went into the church, where there was a considerable number present, both friends and others. On reaching the communion rail, Trotter offered another written protest to Simpson, stating the grounds on which they submitted to the law, but it accidentally fell to the ground where it remained unread. The service commenced, and continued uninterrupted until the bridegroom was told by the minister to repeat after him: 'In the name of the Father, and of the Son, and of the Holy Ghost'. Trotter at first refused. After Simpson insisted that he had to conform in every respect with the liturgy, he reluctantly repeated the words, protesting after saying 'in the name of the Son', and again after repeating 'in the name of the Holy Ghost'. Thompson also objected. Simpson paused, but after conferring with Marriott, continued. The bride, though encouraged to refuse by Thompson and her friends, appears to have complied with the rubric. When the minister was pronouncing the blessing, Thompson again interrupted the service, instructing the bridal party to turn their backs upon the altar, against which Simpson expostulated. Simpson told the party to kneel during the concluding prayers. They protested, saying that it was not required, whereupon Simpson stopped the service, and sat down by the altar. Marriott advised him simply to wait for the party to come to a better resolution. After a little while they did, expressing their wish to have the ceremony completed. The service was then concluded in the usual way, except that the bridal party turned their backs on the clergyman and the altar, 'in a disrespectful and unusual manner' when the Trinity was invoked during the final blessing. Afterwards Thompson expressed his regret that the law should inflict so unnecessary an injury upon all the parties concerned.⁴

The incident was widely reported. Not surprisingly the congregation and its supporters were outraged by the accounts of such irreverent, blasphemous behaviour, and the disrespect shown to the officiating clergyman. *The Times* denounced the hypocrisy of 'those who stickle for liberty of conscience', but did not allow it to others, and continued: 'Was ever absurdity like this? The bridegroom comes to demand the celebration of a rite, and at the same time protests against its celebration in the only way in which the clergyman has sworn and is bound to celebrate it. The clergyman has no option!'⁵ The *St James's Chronicle* also condemned Trotter and his bride, who

⁴ Ibid. See also *Morning Post*, 16 January 1827, 4.

⁵ *The Times*, 16 January 1827, 2.

‘thought their marriage a fit occasion to get up a scene in a crowded London church’. The cry of persecution had, indeed, been raised, but nobody forced Trotter and his bride into a marriage ceremony that they then spurned. They were told to seek ‘the services of a Scotch blacksmith, or a French intendant’.⁶

The public protest by Trotter and his party was not an isolated case. There were at least another nine examples between 1814 and 1827, with more after this date. The written protests issued by couples (including Trotter and his bride) were careful to deny any intention of acting disrespectfully towards either the law or the officiating clergyman.⁷ Both the Church of England clergy and those who objected to the Anglican service were in a hard place. The former had no choice. They were not at liberty to refuse to marry those who presented themselves, nor could they lawfully dispense with any part of the service, although it is clear that a number did do so to accommodate Unitarian objections. It was customary in any case to leave out most of the prayers.⁸ On the other hand, being only human, some clergymen, having been challenged, were quite vindictive. The Rev. Hugh Jones, vicar of West Ham, Essex, not only went through the marriage service but, although he had pronounced the couple man and wife, insisted that they stayed as the ceremony was not yet over. He then went through all the prayers of the service at great length, the greater part of which it was the usual custom to omit.⁹ For those with conscientious objections to the doctrine of the Trinity, there was no other means of obtaining a legal marriage in England after 1753.

The grievances of Dissenters, and in particular of Unitarians, were finally resolved after a long struggle by the Marriage Act of 1836. This provided an alternative to marriage in the Church of England, by allowing Dissenters to be married by their own ministers in their own places of worship, as well as permitting a civil ceremony before

⁶ *St James's Chronicle*, 16 January 1827, 3.

⁷ *The Examiner*, 19 June 1814, 16; ‘Dissenters’ Marriages’, *Freethinking Christians’ Quarterly Register* [hereafter: *Register*] 1 (1823), 267–316, at 292–3, 297–300, 302–4, 305–9; W. L., ‘Protest against the Marriage Ceremony’, *Monthly Repository* [hereafter: *MR*] 12 (1817), 570–1; ‘Controversy on a Marriage Protest of “Freethinking Christians”’, *MR* 20 (1825), 467–74; *The News*, 30 November 1817, 8; *The Times*, 30 May 1823, 3.

⁸ *Register* 1, 293.

⁹ *Ibid.* 306–9.

a registrar for those wishing to dispense with the religious element altogether. The 1836 Marriage Act, and in particular the campaign that led to it, has received surprisingly little attention from historians of Dissent, or from church historians more generally, despite its significance in permitting non-Anglicans to conduct legally recognized marriages according to their own ceremonies in places of worship registered for the purpose. It ended the Church of England's virtual monopoly on marriage. The history of the 1836 Act is of wider significance because it was closely tied to the 1836 Civil Registration Act.¹⁰ The Act also forms the basis of modern English law on marriage. This article is concerned with the Unitarian campaign for reform of the marriage law before 1830.

English Dissenters were required to marry in the Church as a result of the 1753 Clandestine Marriages Act (26 Geo II c. 32), better known as the Hardwicke Act, which restricted valid marriages to the Church of England. Its purpose was narrow, to prevent clergymen from conducting clandestine marriages in the Fleet Prison, London. In the most comprehensive study of the Act and its consequences, Rebecca Probert has argued that it regularized what was already normal practice, and as a consequence was almost universally observed, even by religious Dissenters.¹¹ With the exception of a few foreign Protestant churches, and Quakers and Jews (who were exempt), Dissenters married in the Church of England until the law finally recognized their own marriages in 1836. It is also clear that Catholics and most Protestant Dissenters did not raise any formal objections as the Clandestine Marriages Bill passed through the two houses of parliament. Yet Dissenters and their representatives were not ignorant of the business of parliament, nor slow to raise objections to proposed legislation. In 1757, when the Militia Bill was being debated in the House of Commons, they petitioned successfully against the profanation of the Sabbath.¹² In contrast, the Society of Friends (or Quakers) lobbied parliament to be excluded from the terms of the 1753 Act. Jews were also exempt, probably by happenstance. The Jewish Naturalization Bill was introduced into the Lords while the

¹⁰ The two Acts have consecutive statute numbers, 6 & 7 Wm IV c. 85 and 86: M. J. Cullen, 'The Making of the Civil Registration Act of 1836', *JEH* 25 (1974), 39–59.

¹¹ Rebecca Probert, *Marriage Law and Practice in the Long Eighteenth Century: A Reassessment* (Cambridge, 2009), 1–2, 5–6, 320–3.

¹² *JHC* 27, 717 (17 February 1757).

Marriage Bill was in committee.¹³ As non-Christians, Jews were allowed to become citizens without taking the Anglican sacrament. Perhaps not surprisingly, the same concession was granted to them in the new Marriage Act.¹⁴

For the historian of Dissent, the silence, particularly by the sects, over the 1753 Act is surprising. Baptist and most Congregational or Independent churches shared with the Quakers a refusal to have anything to do with the Church of England and its sacraments. Members who failed 'to marry in the Lord', or who attended funerals, christenings and other acts of worship at the parish church, were regularly disowned in the decades before and after the 1689 Toleration Act. Yet the evidence suggests that they did marry in the Church of England.¹⁵ Dissenters appear to have adopted a pragmatic approach. Marriage mattered. If the marriage was not recognized in law, then any issue of the marriage would be illegitimate and unable to inherit.¹⁶ A couple who had not gone through a regular marriage in their parish church, but who cohabited, were also at risk of being prosecuted for fornication.¹⁷

Although most English Presbyterians refused to conform fully in 1662, because of their dislike of episcopacy and the use of the Common Prayer Book, they shared much of the same doctrine as the Church of England, and many practised partial conformity, attending that which they found acceptable in their parish church, while also resorting to the meeting-house. This was to change in the second half of the eighteenth century. As Presbyterians were influenced by rationalist ideas, they came to question the Trinity, original

¹³ The 1753 Jewish Naturalisation Act (26 Geo. II c. 26) allowed Jews who lived in Great Britain or Ireland for three years to become citizens by act of parliament without taking the Anglican sacrament. It was repealed six months later.

¹⁴ R. B. Outhwaite, *Clandestine Marriage in England, 1500–1850* (London, 1995), 35.

¹⁵ See John Caffyn, *Sussex Believers: Baptist Marriage in the 17th and 18th Centuries* (Worthing, 1988), 128. I am grateful to the Rev. Stephen Copson, Secretary of the Baptist Historical Society, for his comments on this subject.

¹⁶ Probert, *Marriage Law*, 140, 145.

¹⁷ See, for example, E. Welch, 'The Origins of the New Connexion of General Baptists', *Transactions of the Leicestershire Archaeological and Historical Society* 49 (1995), 59–70, at 67; *A letter from the Rev. John Roe, Minister of the Protestant Dissenters at Calverton, near Nottingham, concerning the Imprisonment of their Wives, for Life, for Nonconformity to the Church of England, by Force of the Writ excommunicato capiendo: Addressed to the Rt. Hon. Ld. George Gordon, President of the Protestant Association* (Nottingham, 1789).

sin, atonement and other orthodox doctrines as unscriptural.¹⁸ The term ‘rational dissent’ has been used to describe these changes. Not surprisingly, English Presbyterians found the Trinitarian formulas of the Anglican liturgy increasingly objectionable. As a consequence, they were unwilling to take the Anglican sacrament in order to qualify for political or crown office, thus ending the long-standing practice of occasional conformity.¹⁹ It is less clear why this refusal to accept the Anglican sacraments did not extend to marriage in the Church of England.

Most of those who held anti-Trinitarian opinions in the eighteenth century were Arian: that is, they insisted on the worship of God the Father alone, regarding the Son as subordinate, although still divine. In the final decades of the eighteenth-century, as G. M. Ditchfield has shown, the earlier Arian form of anti-Trinitarian speculation was replaced by a more open and aggressive unitarianism, which, with its insistence on the humanity of Christ, was much more offensive to those who were orthodox.²⁰ Valerie Smith has recently identified the 1790s as a turning point in the evolution of rational Dissent. She also demonstrated a rise in orthodox attacks during the 1780s and 1790s on those holding anti-Trinitarian opinions.²¹ Although many ministers and individuals had adopted unitarian ideas, it is not possible at this date to talk of unitarian congregations, both for reasons of nomenclature (the label ‘unitarian’ was not used by such congregations) and because a majority had not yet openly embraced unitarian opinions. When Thomas Belsham resigned as Theological Tutor of Daventry Academy in 1789, after adopting unitarian opinions, all but about six of the forty divinity students were said to share his views. One of them recalled that the prospects during the 1780s and 1790s for a young minister who had embraced unitarianism seeking a congregation were ‘peculiarly disheartening’. The success of the Evangelical Revival in revitalizing Dissent had closed many churches to those who were not strictly orthodox. Only the congregations at

¹⁸ For an account of this transformation, see C. Gordon Bolam et al., *The English Presbyterians: From Elizabethan Puritanism to Modern Unitarianism* (London, 1968), 134–40, 145–50.

¹⁹ G. M. Ditchfield, ‘Anti-Trinitarianism and Toleration in late Eighteenth-Century British Politics: The Unitarian Petition of 1792’, *JEH* 42 (1991), 39–67.

²⁰ *Ibid.* 44.

²¹ Valerie Smith, *Rational Dissenters in Late Eighteenth-Century England: ‘An ardent desire of truth’* (Woodbridge, 2021), 140–52.

Kettering and Wellingborough in Northamptonshire, and the Great Meeting in Leicester, were willing to hear students from Daventry preach, or students from Northampton, where the academy moved in 1789.²² The situation was to change rapidly in the first decades of the nineteenth century. By 1810, Charles Wellbeloved, principal of Manchester College, York, then the only academy openly preparing students for the Unitarian ministry, admitted that the demand for ministers completely outstripped the number being trained.²³

The development of early nineteenth-century Unitarianism still has to be explained in detail, but undoubtedly the Unitarian Society, which assisted poor congregations and supported Unitarian missionaries, and the *Monthly Repository*, a publication dedicated to the advancement of Unitarianism, both founded in 1806, were important in helping to create a denominational focus. Moreover, constraints on the open avowal of unitarian views, proscribed until the passing of the Unitarian Relief Act in 1813 (53 Geo. III c. 160), had limited efforts to promote unitarianism. The establishment of the Association for the Protection of the Civil Rights of Unitarians in 1819, and the incorporation of the Association with the Unitarian Society and other bodies in 1825 to form the British and Foreign Unitarian Association, were important steps, particularly in the campaign for the removal of continuing penalties against Unitarians.

The doctrinal changes within English Presbyterianism lacked popular appeal, and there was significant loss of members, particularly in the countryside, to the Congregationalists. Only about a third of the congregations which had been Presbyterian in 1700 adopted unitarian opinions. Yet despite the decline in numbers, in most major towns by the end of the eighteenth century these congregations had become centres of great wealth and influence, often including members on the fringes of county society. By the early nineteenth century, Unitarianism was supported by some of the greatest

²² David L. Wykes, 'Rational Dissent, Unitarianism, and the Closure of the Northampton Academy in 1798', *Journal of Religious History* 41 (2017), 3–21, at 14, 18; A Daventry Student, 'Recollections of Mr Belsham, at Daventry', *Christian Reformer* 16 (1830), 102–3.

²³ David L. Wykes, 'Educating Students for the Unitarian Ministry in the Early Nineteenth Century', *Transactions of the Unitarian Historical Society* 26 (2015), 79–98, at 82.

industrialists of the period.²⁴ Because of their social and political standing, Presbyterians, and later Unitarians, led the struggle for reform and provided the political leadership for Dissent until the 1832 Reform Act, which resulted in the return of large numbers of orthodox Dissenters to parliament representing many of the new urban constituencies. For more than twenty-five years, the Unitarian MP William Smith was the leading advocate for the Dissenters in the House of Commons until his retirement from parliament in 1830.²⁵

Before 1814, most Unitarians, despite their opposition to the Trinity and other orthodox doctrines, voiced no apparent objections at having to marry in the Church of England and submit to a Trinitarian marriage ceremony. The Unitarian Association acknowledged in 1819 that Unitarians had not previously raised any formal objection to being married in the Church, and they admitted that before 1753 Dissenters largely conformed to the marriage rites of the Church of England. They gave several reasons: firstly, that for the most part English Presbyterians before the second half of the eighteenth century were still largely orthodox in matters of doctrine; secondly, the importance of having a marriage which was recognized as valid, and not at risk of challenge by the ecclesiastical courts. The Association accepted that the failure of Unitarians to challenge the law before 1819 was open to criticism, but they argued that until the Unitarian Relief Act 1813 gave them the same rights as other Dissenters under the 1689 Toleration Act, it was not appropriate for them to seek relief.²⁶ It is clear that their position changed, and the issue became of central importance to them, as a result of the efforts of the Freethinking Christians, whose militant objections to the Trinity and to any form of sacrament had long led them to object to the Anglican marriage service. Formed by a secession from the

²⁴ John Seed, 'Gentlemen Dissenters: The Social and Political Meanings of Rational Dissent in the 1770s and 1780s', *HistJ* 28 (1985), 299–325, at 302–6; David L. Wykes, 'Sons and Subscribers: Lay Support and the College, 1786–1840', in B. Smith, ed., *Truth, Liberty, Religion: Essays Celebrating Two Hundred Years of Manchester College* (Oxford, 1986), 31–77, at 62–3, 67–8.

²⁵ Richard W. Davis, *Dissent in Politics, 1780–1830: The Political Life of William Smith, M.P.* (London, 1971).

²⁶ *Report of the Committee of the Unitarian Association for Protecting the Civil Rights of Unitarians to the General Meeting* (3 June 1819), [1]; *Short Statement of the Case of the Unitarian Dissenters, Petitioners for Relief from some parts of the Ceremony imposed by the Marriage Act* (n.pl., [after June 1819]), 2.

Universalists in Parliament Court, Bishopsgate, they first met on Christmas Day 1798, and elected Thompson as their elder. They at once announced their rejection of the Trinity, and the sacraments of baptism, marriage and the Lord's Supper, as well as public singing and prayer. The church developed rapidly, often by courting controversy.²⁷

In 1808, the *Monthly Repository* published a letter in which the writer wrote that, after reading Theophilus Lindsey's *Conversations on Christian Idolatry* (1792), and examining the marriage service for himself, he had decided that it was 'utterly impossible' for a Unitarian, 'either tacitly or openly', conscientiously to go through the marriage service in the Church of England. For no Unitarian could 'join in the worship of the man Jesus, or to pronounce that he does all this, in the name of the Father, Son, and Holy Ghost, thereby giving a sanction to the absurd and idolatrous notion of the Trinity'. As a Unitarian he feared that he would not be able marry in the Church of England.²⁸ The letter received a reply from someone who signed himself 'an Unitarian Husband'. He claimed in the case of his own marriage to have used the words 'In the NAME of ALMIGHTY God', in the place of the Father, the Son and the Holy Ghost. He believed that because he was known to the clergyman conducting the service, his deviation from the liturgy was ignored.²⁹ Such an approach was impractical for most Unitarians. It is clear that clergymen generally were unwilling to be so accommodating, as the experience of Trotter and others demonstrates.³⁰

The issue was not apparently raised again by Unitarians in any of their publications until 1812, when another letter, from a

²⁷ 'Free-thinking Christians', *MR* 4 (1809), 284–6; John Evans, *A Sketch of the Denominations of the Christian World* (London, 1814), 311–21 (by a member appointed by the society); 'A Brief Account of the Church of God known as Free-Thinking Christians', *Christian Teacher* n.s. 3 (1841), 284–6. Joan Christodoulou, 'The Freethinking Christians and the Millennium', *London Journal* 14 (1989), 148–59, is concerned with the links to other nineteenth-century radical groups, and only briefly mentions their marriage campaign.

²⁸ 'Unitarian Bachelors', *MR* 3 (1808), 377–8. The letter was by a leading member of the Freethinking Christian Church: see *Register* 1, 287–8. See also Candidus, 'On the Marriage Ceremony', dated Homerton, 11 December 1810, *Freethinking Christians' Magazine* 1 (1810–11), 33–7.

²⁹ 'An Unitarian Husband's Advice to an Unitarian Bachelor', *MR* 3 (1808), 470.

³⁰ See also 'The English Unitarians and the Marriage Question; a Conversation', *Christian Pioneer* 4 (1829), 86.

correspondent in Norfolk who was clearly a Unitarian, was published in the *Monthly Repository*. Why, the writer wrote, if Dissenters were permitted to baptize and bury according to their own religious forms, did they not have the same exemption enjoyed by Quakers to marry their own?³¹ Although this suggests that Unitarians were beginning to think about the marriage ceremony, it did not amount to a campaign. The lack of progress led Freethinking Christians to seek an amendment to the Marriage Act themselves. When in March 1812, Griffin Wilson, MP for Great Yarmouth, gave notice in the Commons of motion to amend the 1753 Act, two members on behalf of the church sought his support to include relief for unitarians. Wilson, while apparently acknowledging the seriousness of their case, was unwilling to make any additions to his motion for fear of provoking opposition which might imperil his own proposal.³²

The issue had become pressing for the church as a number of younger members were approaching an age when they wished to marry. The only solution involved taking a journey to Scotland, where the 1753 Act was not in force, but many could afford neither the time nor the expense. They were also conscious that marriage in Scotland offered ‘to the world no public testimony against the injustice of the marriage ceremony, and could have no tendency to procure for us any relief from the Legislature’.³³ They therefore decided upon a common form of action for all members of the church who married in the Church of England. They were to draw up a written protest to give to the officiating clergyman at the altar before the ceremony (they had considered requiring the parties to read it out during the service) giving their objections, which they would afterwards publish in the newspapers. While some members feared that if the protest was presented at the altar the minister would refuse to marry them, they were advised that he could not refuse.³⁴ This plan was first carried out in June 1814 with the marriage of Thompson’s eldest daughter, Mary Ann, to William Coates.³⁵

³¹ T., ‘Dissenters’ Marriages’, *MR* 7 (1812), 567–8. The reference to the right of Dissenters to baptize their children indicates that the correspondent was not a Freethinking Christian, since they rejected baptism.

³² *Register* 1, 290–1.

³³ *Ibid.* 291–2; ‘On Marriage’, *Freethinking Christians’ Magazine* 3 (1813), 513–20.

³⁴ ‘Protest against the Marriage Ceremony’, *Freethinking Christians’ Magazine* 4 (1814), 326–36, at 327.

³⁵ *The Examiner*, 19 June 1814, 16; ‘A Protest against the Marriage Ceremony’, *MR* 9 (1814), 354–6.

The Freethinking Christians were too few in number and lacking in influence to achieve any change in the legislation themselves. It was their success in engaging the general body of Unitarians which eventually led to the change in the law. In June 1814, they successfully lobbied the Unitarian Fund at its annual meeting in London. Thompson spoke at length about the lack of action by Unitarians and the urgent need to obtain relief through parliament. Afterwards he was assured that the committee would take up the issue.³⁶ From this date it is evident that Unitarians were increasingly troubled by the marriage question. In January 1815, a member of the Kent and Sussex Unitarian Association noted that Dissenters were now concerned about marrying in the Church of England. Unitarians, in particular, were ‘apprehensive that they depart here from their great leading principle’, since parts of the marriage service were undeniably Trinitarian. The correspondent thought the time opportune to seek relief from parliament, and suggested that the Unitarian MP William Smith should be approached for help.³⁷ In 1813, Smith had successfully persuaded parliament to remove the penalties against Unitarians. Before the Unitarian Relief Act the expression of anti-Trinitarian ideas had been unlawful; whilst the penalties were rarely enforced, the threat was there.³⁸

The question of marrying according to the ceremony of the Church of England was raised publicly at the close of the annual meeting of the Kent and Sussex Unitarian Association in June 1815. It was represented ‘as inconsistent with the doctrine of the Divine Unity, and with the supremacy of Christ in his church’.³⁹ The following month the newly established Devon and Cornwall Unitarian Society, at its first annual meeting, instructed the secretary to seek the support of similar Unitarian associations to obtain relief from the Anglican marriage service.⁴⁰ By late July 1816 the question was said to be ‘agitating among different bodies of Unitarians’, and

³⁶ *Register* 1, 294. There is no record of Thompson’s speech in the Unitarian accounts of the annual dinner.

³⁷ ‘Marriage Service of the Established Church Trinitarian’, *MR* 10 (1815), 80–1.

³⁸ The Doctrine of the Trinity Act 1813 (53 Geo. III c. 160) amended the 1689 Toleration Act (1 Wm & Mary c. 18) to include non-Trinitarians and repealed the provisions of the 1697 Blasphemy Act (9 Wm III c. 35) against those who denied the Trinity.

³⁹ [Thomas] P[ine], ‘The Fourth Anniversary of the Kent and Sussex Unitarian Association and Tract Society’, *MR* 10 (1815), 527.

⁴⁰ ‘Mr Worsley on the Marriage Ceremony’, *MR* 11 (1816), 208.

individual Unitarians were already in discussion with Smith about amending the 1753 Act to give relief.⁴¹ It was essential that the issue was adopted by local Unitarian associations and congregations, since Unitarians at this date lacked an effective national body to organise a campaign.⁴² In July 1817, a petition from Unitarian Christians in Kent and Sussex was presented in the Commons by Smith, and in the Lords by the Marquis of Lansdowne. It was said to have nearly five hundred signatures.⁴³ The Freethinking Christians complained that no further action in public was then taken by Unitarians for two years.⁴⁴

It was not until the formation of the Association for the Protection of the Civil Rights of Unitarians in 1819, with the lawyer Edgar Taylor as secretary, that the first attempt was made in parliament by Unitarians to amend the 1753 Act. The contribution the Association made in organizing and sustaining the Unitarian campaign to change the marriage law was crucial. The survival of Taylor's papers makes it possible to see much more clearly his role and that of the Association.⁴⁵ There was some doubt amongst the committee about whether the Association should take direct action and lobby for a change in the law, but their hand was forced by 'a great number of our friends' in the country, 'bent on agitating the question'. The committee thought it essential that care be taken that no prejudice to the question should arise from any 'premature or imprudent introduction' of the Unitarian claim.⁴⁶ They therefore circulated a draft petition, stating the grounds on which the

⁴¹ Consistianus, 'Unitarian Marriages', *Monthly Magazine* 42 (1816), 210.

⁴² The various Unitarian national bodies were poorly supported: see H. L. Short, 'The Founding of the British and Foreign Unitarian Association', *Transactions of the Unitarian Historical Society: Supplement* (1975), 15s–16s.

⁴³ *JHC* 72, 466 (8 July 1817); *Morning Post*, 11 July 1817, 1; *Register* 1, 294.

⁴⁴ *Register* 1, 294–5.

⁴⁵ London, Parliamentary Archives, UAM/1–3, The Unitarian Association Marriage Law Petitioning Papers, 3 vols, 1819–37. The volumes are a rare example of a parliamentary agent's papers. Originally collected together by Edgar Taylor, they were given by Sharpe & Pritchard, the successors to his firm, to the British Record Association in 1965, who donated them to the House of Lords Record Office (now the Parliamentary Archives). I am grateful to Dr Mari Takayanagi, senior archivist, for information about the archive's provenance, and for granting permission on behalf of the Parliamentary Archives to cite and quote from the Unitarian Association's petitioning papers.

⁴⁶ Parliamentary Archives, UAM/1/5, Edgar Taylor to William Smith, 4 February 1819.

Unitarian case rested, for presentation to both the Lords and the Commons.⁴⁷

From late May until late June congregations petitioned the two houses. The petitions reveal the depth and widespread nature of the grievances that had developed among Unitarians. There were petitions from major Unitarian congregations in Liverpool, Exeter, Bristol and Hackney, as well as from the Universalists at Parliament Court and the Freethinking Christians in Jewin Street. Smaller congregations at Newport (Isle of Wight), Gloucester, Framlingham (Suffolk), Thorne (near Doncaster), Lincoln, and Falmouth and Flushing (Cornwall) also presented petitions.⁴⁸ Marriage in the Church of England was an issue that concerned members of smaller and poorer congregations as much as those belonging to larger and wealthier ones. John Gaskell, minister at Thorne, reported that his congregation wanted their petition presented as soon as possible.⁴⁹

Not every congregation was in favour of petitioning parliament, and there were doubts whether an application would succeed in the prevailing political climate, which was hostile to reform. There was a difference of opinion amongst the High Pavement congregation at Nottingham, where a considerable majority thought the time was wrong for an application. Despite this decision, James Tayler, the minister, wrote to Taylor a month later that ‘the minority have, notwithstanding, prepared a petition to the House of Commons’.⁵⁰ Members of the Newport congregation, while wishing the committee success, were

rather doubtful whether they will obtain their object on their own terms. The Unitarian body is now large & generally speaking is a wealthy body. The emoluments arising from the marriages among them are of course not in considerable [*sic*]. And the church & State have formed so strong a coalition & both watch over the pecuniary interests of the former with so much jealousy, that we fear our request may be

⁴⁷ ‘Unitarian Association. Marriage Laws’, *MR* 14 (1819), 125. In response to suggestions, a second version was issued: *ibid.* 198.

⁴⁸ ‘Marriage Law’, *MR* 14 (1819), 382–6, at 382.

⁴⁹ Parliamentary Archives, UAM/1/9, Gaskell to Taylor, 10 May 1819.

⁵⁰ Parliamentary Archives, UAM/1/15, 23, James Tayler (Nottingham) to Taylor, 23 May, 23 June 1819.

esteemed too extravagant for the Ministers to permit so great a source of profit to be taken from the clergy.⁵¹

The loss of fees by the parish clergy was to prove a major obstacle in gaining the support of some bishops for reform of the Marriage Act.

Care was taken to obtain as many signatures as possible, though this was not without difficulty when members were out of town, and local organizers were sensitive about the need to ensure that those who signed were respectable and entitled to vote. Doubtless because of the latter point, the decision was taken at Plymouth to canvass only male members.⁵² Attention was also paid to who should present the petition in parliament. The campaign gave Unitarians an opportunity to demonstrate their political influence locally. It was generally accepted that Smith would present the petitions in the Commons, although a number of sympathetic MPs were also involved.⁵³ After being approached by Taylor, the Marquis of Lansdowne agreed to present any petitions in the Lords.⁵⁴ Lant Carpenter, in forwarding the petition for the Lewin's Mead congregation in Bristol, wrote: 'I take for granted you put those for the Commons in the hands of Mr Smith', but if the Association had no arrangement for the Lords, he suggested Lord Holland. 'I happened to have had some correspondence with him about Catholic Claims, and the Devonshire Election, and I think he would take pleasure in presenting it.'⁵⁵ The Plymouth congregation applied its influence, and the Lord Lieutenant, Lord Fortescue, agreed to present the petition in the Lords, and Sir William Congreve in the Commons.⁵⁶ Taylor attempted to enlist the support of the other Dissenting denominations, by canvassing the Ministers of the Three Denominations, although at this date without success.⁵⁷ The

⁵¹ Parliamentary Archives, UAM/1/11, W. Stevens (Newport, Isle of Wight) to Taylor, 14 May [1819].

⁵² Parliamentary Archives, UAM/1/12, J. Fullagar (Chichester) to Taylor; UAM/1/13, Lant Carpenter (Bristol) to Taylor, 17 May 1819; UAM/1/14, Israel Worsley (Plymouth) to Taylor, 28 May 1819.

⁵³ The Crediton congregation suggested the Whig politician Lord Ebrington, who sat in the Commons: Parliamentary Archives, UAM/1/10, G. Hinton (Crediton) to Taylor, 13 May 1819.

⁵⁴ Parliamentary Archives, UAM/1/17, Lansdowne to Taylor, 9 June 1819.

⁵⁵ Carpenter to Taylor, 17 May 1819.

⁵⁶ Worsley to Taylor, 28 May 1819.

⁵⁷ Parliamentary Archives, UAM/1/19, 21 Thomas Morgan (Dr Williams's Library) to Taylor, 17 June 1819.

petitioning by Unitarian congregations did, however, encourage some orthodox Dissenters to petition parliament.⁵⁸ Dissenters in Great and Little Broughton in Cumberland pointed out in their petition that Protestant Dissenters and Catholics in Ireland and Dissenters in Scotland (including the Episcopal Church) had the right to conduct their own marriages, and that it was ‘an invidious and unmerited Distinction that the same Right should be withheld from them as Protestant Dissenters in England’, except for Quakers and Jews.⁵⁹

The committee not only organized the petitions to parliament, but it is clear that they were responsible for preparing the bill. After much consideration, they adopted the draft bill drawn up by Christopher Richmond, a parliamentary conveyancer and zealous Unitarian, who with Taylor was a member of Robert Aspland’s congregation at Hackney.⁶⁰ Taylor had told Smith that the committee had no objection ‘to the legal contract being perfected at the church if the ceremony were made unobjectionable or if persons scrupling the service or parts of it, were entitled to have it waived’. The committee thought the alternative, of Unitarians celebrating marriages in their own places of worship, was ‘attended with many Inconveniences & not desirable’, presumably because of problems over registration and in gaining the acceptance by the courts of the lawfulness of a ceremony conducted in a Dissenting chapel.⁶¹ The Bill allowed for all the marriage service which was ‘properly religious and devotional’ to be omitted, leaving the priest as a registrar only, ‘receiving his fee in that capacity’, and making the parish church no more than a register office, the church being ‘the most convenient and secure place for registration’.⁶² The committee was aware that the draft Bill fell short of what some Unitarians wanted, who desired ‘a complete separation of the marriage contract from the place as well as the officers, of the Established Church’. The committee was convinced such an object could not be achieved unless the general body of Dissenters united in support, and that it was better to gain ‘relief from the chief, if not the whole, of the difficulties which at present exist’.⁶³

⁵⁸ *JHC* 74, 532, 597, 621 (14, 30 June, 6 July 1819).

⁵⁹ *Ibid.* 621 (6 July 1819); see also Cockermouth, *ibid.* 597 (30 June 1819).

⁶⁰ ‘Unitarian Association: Marriage Laws’, *Christian Reformer* 5 (1819), 275–6, at 275; ‘Marriage Law’, 382. For Richmond, see ‘Obituary’, *MR* n.s. 6 (1832), 127.

⁶¹ Taylor to Smith, 4 February 1819.

⁶² ‘Unitarian Association’, 275

⁶³ ‘Marriage Law’, 382; *Report of the Committee, 1819*, 1.

Taylor and the committee used the petitions to bring Unitarian grievances to the attention of both the Commons and the Lords, and to recite the arguments for reform. When introducing his motion in June 1819, Smith referred to the petitions, chiefly signed by Unitarians, and to the respectability of the petitioners. He gave the arguments which the Unitarian Association had in fact made earlier: that the Marriage Act was a civil contract and that a religious service was not necessary for it to be valid. His Bill authorized the clergyman to omit certain words at the request of the parties marrying. He claimed that it imposed no additional duties on the ministers; it proposed no reduction or loss of fees; it proposed no alteration of property; in short, it was to reconcile the scruples of the conscientious. Indeed, the clergyman would be relieved from the painful duty of enforcing what was offensive to others.⁶⁴ The Bill received a first reading on 29 June and a second the next day, and on 1 July Smith moved its commitment.⁶⁵ It was on the whole favourably received by the House, but Lord Castlereagh on behalf of the government asked for it to be postponed due to the lateness of the session. Because of the death of George III, the bill was not reintroduced in 1820, nor, because of the campaign for Catholic emancipation, in 1821.

In April 1822, Smith sent the archbishop of Canterbury, Charles Manners-Sutton, a copy of the draft Bill in the hope of engaging his support. The archbishop replied a week later, on 9 April, that the bishops were decidedly of the opinion that 'it is unreasonable to exact from the established Church for the purpose of removing the religious scruples of those who dissent from it, an alteration affecting an essential article of Faith, in the prescribed Form of Solemnization of Matrimony'.⁶⁶ Nonetheless, on 17 April, Smith reintroduced his measure 'to leave out the whole of that part of the ritual which stated opinions on which the petitioners dissented from the Church of England'.⁶⁷ The Editor of the *New Times*, while sympathetic to Smith's objects, pointed out that in seeking 'to relieve the consciences of *Dissenters*, a sore wound is given to the consciences of the *Established Clergy*'. They were being expected 'to perform a sacred

⁶⁴ 'Marriage Act Amendment Bill', HC Deb. (1st series), 16 June 1819 (vol. 40, cols 1200–1); 'Marriage Act', *The Times*, 17 June 1819, 2.

⁶⁵ *JHC* 74, 588, 598, 606–7 (29, 30 June, 1 July 1819).

⁶⁶ Parliamentary Archives, UAM/1/30, Archbishop of Canterbury to Smith, 9 April 1822.

⁶⁷ 'Marriages of Unitarian Dissenters', HC Deb., 17 April 1822 (vol. 6, col. 1462).

rite, in a manner which, to many of them, may appear little less than a renunciation of their faith.'⁶⁸ Because of the opposition from the Church of England, Smith withdrew his bill.

During February and March 1823, Taylor lobbied the House of Lords Committee which had been established to consider the state of the 1753 Marriage Act, 'with a view to frame one complete measure'. He asked Lansdowne and Lord Holland to present to the Committee petitions from Unitarians stating their grievances.⁶⁹ Holland thought the claim so reasonable that 'the only difficulty in Parliament is the mode of accomplishing your purpose'.⁷⁰ Unfortunately, securing the agreement of all the different interests over the best method of providing relief was to prove almost impossible, and vexed all attempts at obtaining relief for Dissenters generally or Unitarians in particular.

Smith's new Bill proposed to legalize Dissenting marriages conducted by their own ministers, as long as banns were published or a licence was obtained. Despite the earlier promise, Lord Ellenborough had to admit that the Committee was unwilling 'to embarrass' the intended bill by including all the various provisions necessary to guard against abuse, but there was 'no hostile feeling to the demands of the Unitarians', and the Lords 'would consider with a certain degree of favor' any bill introduced as a separate measure.⁷¹ Taylor told Smith that the Unitarian Committee were 'decidedly of Opinion that they ought to embrace the sort of invitation held out' by the Lords' Committee. They thought it 'useless to pass a measure through the Commons' which would not meet the approval of the Lords. A draft Bill was then prepared and, as Taylor told the secretary of the Body of the Three Denominations, 'it has been settled by Counsel with the assistance of Lord Ellenborough and is considered to be in unison with the wishes of the Committee of the Lords'.⁷²

⁶⁸ *New Times*, 20 May 1822, 3.

⁶⁹ Parliamentary Archives, UAM/1/43, copy of letters from Taylor to Lansdowne and Holland, 24 February 1823.

⁷⁰ Parliamentary Archives, UAM/1/44, 46, Holland to Taylor, 25 February 1823, Lansdowne to Taylor, 1 March 1823.

⁷¹ Parliamentary Archives, UAM/1/47, 48, Lord Ellenborough to Smith, 8 and 15 March 1823.

⁷² Parliamentary Archives, UAM/1/57, 58, 59, Taylor to Smith, 29 May, 5 June 1823, Taylor to Coates (Secretary of the Dissenting Ministers of the Three Denominations), 5 June 1823.

A Bill to extend to all Dissenters the privileges granted to Quakers and Jews in 1753 was introduced in the Lords by Lansdowne in June 1823. Unfortunately, the proposals were thought too wide, and there were concerns that they would open the door, in the Lord Chancellor Lord Eldon's words, to 'rangers, jumpers, and various other sects, of whose principles they knew nothing'. The Bill failed to obtain a second reading by 31 votes to 37.⁷³ As Smith later noted, the Lords' Committee 'seemed at first disposed to frame a very general Bill, leaving all classes of Diss[ente]^{rs} much to themselves – from this point they recede, to doing nothing in it, but professing to be ready to pass such Bill as shall be bro[ugh]t in by others'. He then expressed the frustration he and others felt over the behaviour of many in the Lords, always wanting something more, whatever was proposed. Even before the Bill was introduced by Lansdowne, Smith feared that 'the Bishops or some other Persons will contrive to extract arguments or rather Pretences against doing anything'.⁷⁴ Christopher Richmond, who had helped draft the Bill, feared 'they won[']t admit any class of Dissenters but upon application & upon narrow grounds'.⁷⁵ More generally, the Unitarian Committee was in an awkward situation. The Association had 'singly and unaided' campaigned for reform, but as Taylor told John Wilks, secretary of the Protestant Society, 'We have all along felt some difficulties, wishing on the one hand not to seek for ourselves alone, what was wanted by all; and on the other hand, fearing lest we should by making our measure quite general, be considered as taking too much on ourselves'.⁷⁶ Smith did not share such doubts, strongly believing that 'the Unitarians should not be prevented from obtaining any Relief which the L[or]^{ds} or the Gov[ernmen]^t may be disposed to grant them, even exclusively'.⁷⁷

The following March, Lansdowne, after consulting Archbishop Manners-Sutton, told Taylor that he expected to be able to carry the Bill, although not without some amendments. The Bill, once again prepared by the Association, was introduced by Lansdowne to the Lords in April. It permitted marriages between parties who

⁷³ 'Dissenters Marriages Bill', HL Deb. (2nd series), 12 June 1823 (vol. 9, cols 969, 973).

⁷⁴ Parliamentary Archives, UAM/1/64, 65, Smith to Taylor, n.d. [early June 1823].

⁷⁵ Parliamentary Archives, UAM/1/[66], Richmond to Taylor, n.d.

⁷⁶ Parliamentary Archives, UAM/1/63, Taylor to Wilks, 11 June 1823.

⁷⁷ Parliamentary Archives, UAM/1/65, Smith to Taylor, n.d.

were both Unitarians, by their own ministers, in their own chapels, registered for the purpose. The archbishop believed that ‘relief could only be given in one of two ways – either by enabling the Unitarians, under certain regulations, to intermarry in their own places of worship, or by an alteration of the form of the marriage ceremony in the church of England service.’ He strongly objected to the latter, which simply transferred to the church the grievances which it sought to redress. ‘The only mode of relief; then, was by this bill.’ During the debate on the second reading, Lord Chancellor Eldon claimed to general surprise that despite the 1813 Act giving relief to Unitarians, according to common law it was still illegal to deny the doctrine of the Trinity. The bishop of Chester could not see what objections Unitarians might have to the words of the marriage ceremony, which were based on Scripture. ‘The Unitarian was not bound to assent to the accuracy of those terms: he might affix to them what meaning he pleased. There was no force or compulsion upon him to induce him to acquiesce in them.’ He also feared the loss of income by the clergy from marriages in the church. Lord Harrowby saw nothing in the Bill that would affect the dignity, honour or security of the church, and pointedly asked whether their Lordships would be satisfied with a marriage ceremony for themselves in which the name of Mahomet was adjured. The Bill received a second reading by 35 votes to 33.⁷⁸

The *Leeds Mercury* was not sanguine that the Bill would proceed, because of the narrowness of the vote and because several who supported the principle of the Bill were hostile to its particular provisions. It continued: ‘there is a party in the House of Lords, (which we fear will ultimately prove the majority,) with the Lord Chancellor at its head and a list of bishops in its ranks, which positively refuses any relief whatsoever to the Unitarians in this respect’.⁷⁹ When Lansdowne moved that the Lords resolved itself into a committee, the motion was again opposed by the bishop of Chester, who remained convinced that ‘the Unitarians had no reasonable grounds for their objections to the marriage-ceremony of the Church of England’. He was supported by the bishops of St Davids and St Asaph. On the other hand, the archbishop of Canterbury could not

⁷⁸ ‘Unitarian Marriage Relief Bill’, HL Deb. (2nd series), 2 April 1824 (vol. 11, cols 75–6, 79, 82, 84, 95).

⁷⁹ *Leeds Mercury*, 10 April 1824, 2.

see that the strength of objection that they and others used on the church's behalf was justified. It was true that Unitarians denied the existence of the Trinity, and it was on that account they were entitled to be relieved from a ceremony which compelled them to appear to sanction that doctrine. Did the House wish 'to enforce a seeming acquiescence in the doctrines of the Established Church' from persons who so far dissented from them? The bishop of Exeter also thought that Unitarians were entitled to relief, 'that persons who did not believe in certain doctrines ought not to be compelled to join in ceremonies depending on those doctrines'. In turn, Lansdowne said that he could never suppose that any prelate of the Church of England would wish to impose an assent to doctrines which it was well known they came to church prepared to reject. 'To encourage equivocation was unworthy of a Christian and of a Protestant Christian.' When the House divided, the motion was lost by 105 votes to 66.⁸⁰ In 1825, the marriage bill passed the Commons but was lost in the Lords by two votes. Two years later, in May 1827, Smith introduced another Bill, which involved Dissenters having their banns for marriage called in their parish church and the marriage recorded in the parish register. This passed the Commons, and the bishop of Chester believed the clergy would not object to publishing the banns of Dissenters.⁸¹ But it ran out of time. In fact, the clergy were against publishing 'banns in the church, affixing them to the church door, and the registering the marriage by the clergy', and petitioned strongly against it.⁸² The Bill was reintroduced in 1828, but modified to exclude the involvement of the clergy. This failed too.

The campaign to amend the Marriage Act was then stalled by other campaigns for reform, in particular the Reform Bill, and above all weakened by the growing divisions between Unitarians and orthodox Dissenters, who deplored the religious beliefs of those who denied the Trinity. The preoccupation of the Dissenting Deputies with the repeal of the Test and Corporation Acts from 1827, and the determination of other Dissenters not to engage in

⁸⁰ 'Unitarian Marriage Bill', HL Deb. (2nd series), 4 May 1824 (vol. 11, cols 435–6, 446); 'Unitarian Marriages', *Morning Post*, 5 May 1824, 2.

⁸¹ 'Dissenters' Marriages Bill', HL Deb. (2nd series), 29 June 1827 (vol. 17, col. 1427).

⁸² *The Standard*, 3 January 1828, 3; 10 January 1828, 4; 12 January 1828, 2; *Yorkshire Gazette*, 12 January 1828, 3.

what were seen as Unitarian causes, meant that the campaign for reform of the Marriage Act continued to be led by Unitarians.⁸³ Finally, after the passing of the Reform Bill in 1832, marriage relief became the second of the six major grievances published by Dissenters that year, civil registration being the first. In October, the Dissenting Deputies decided to act in concert with the Unitarian Association. They had concluded that reform of civil registration and reform of the Marriage Act had to go hand in hand. After Bills in 1832 and 1834 had failed, they were finally successful in 1836. The 1836 Act was far from perfect, but it was passed because the alternative was the failure of the whole Bill. Previous attempts to alter the liturgy or to give Dissenters the same exemption from the 1753 Act as Quakers had failed. The 1836 Act proved much broader. It removed the restriction that only marriage in the Church of England was a valid marriage, by allowing a registrar's certificate to be used in lieu of banns, either in an Anglican church or some other place of worship, and it introduced the option of civil marriage before the registrar in a register office.⁸⁴

The struggle to amend the Marriage Act was initiated by the Freethinking Christians, who as a small and despised religious sect lacked the influence to achieve a change in the law themselves. They adopted the only means open to them, a controversial and highly visible public campaign of protest. They successfully engaged the broader Unitarian movement in their campaign. Unitarians, though losing influence to the much larger body of orthodox Dissent, still retained sufficient weight with the political establishment to undertake a campaign and to introduce a series of Bills in parliament. The papers of the Unitarian Association's parliamentary campaign reveal the remarkable efforts of the Association and of its secretary Edgar Taylor in undertaking an effective campaign while only representing a small denomination. Despite sponsoring a range of alternatives, it proved impossible to find a scheme acceptable to the Church of England. By 1827, when Trotter made his protest, five Bills had already failed, despite efforts to find an accommodation

⁸³ B. L. Manning, *The Protestant Dissenting Deputies* (Cambridge, 1952), 260–2, 272.

⁸⁴ For a detailed account of the final years of the campaign to change the law, see Cullen, 'Making of the Civil Registration Act', 40, 43, 48–9, 51–4; Rebecca Probert, *Tying the Knot: The Formation of Marriage 1836–2020* (Cambridge, 2021), 21–53; eadem, *Marriage Law*, 332–8.

with the Church of England; a further Bill introduced that year also failed. Whilst it is true that the Unitarian campaign did not directly result in the 1836 Act, it did establish general agreement in parliament that the Marriage Act needed to be reformed to accommodate the needs of Dissenters, and of Unitarians in particular. The campaign to amend the Marriage Act shows the importance of liturgy, both to the Church of England, for whom change was largely unacceptable, as well as to those protesting at being forced to go through a ceremony with a clergyman whose episcopal orders and ritual they rejected.