



Historic England

From the Chief Executive
Duncan Wilson

Andrea Mulkeen
Church House
Great Smith Street
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28 January 2016

Dear Andrea,

I am writing in response to your report “The Report of the Church Buildings Review Group”, on behalf of Historic England, which is the public body that looks after England’s historic environment. We champion historic places, helping people understand, value and care for them. We have enormous respect for the congregations and communities who take responsibility for the Church of England’s historic parish churches, recognising that stewardship of over 12,000 listed buildings is an additional pressure on their resources, on top of their primary focus on mission and ministry.

In this context we welcome the *Church Buildings Review* consultation. Our response is underpinned by on-going commitment to local and national partnership to ensure that these very significant buildings continue both to serve the spiritual and pastoral needs of their parishes and make a vital contribution to the national and local heritage. Where they are not required for worship we are committed to working with the Church, local authorities and potential new owners to find creative and viable future uses.

The following paragraphs are a summary of our overall response to the *Review*; more detailed comments on specific Principles and Recommendations are appended.

The statistical analysis, following on from the extremely useful data in *Released for Mission; Growing the Rural Church*, demonstrates the extent of the challenges being faced. The theological perspective sets out a framework of reference that is invaluable for the heritage sector and, we hope, it will also inform congregations and clergy as they identify their needs and balance them against the significance of their local heritage.

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The *Review* suggests that there is a need for national reflection on the challenges facing the Church of England and we would strongly support that. These buildings are, as the report emphasises, a major part of the nation's heritage and Historic England would welcome a much broader discussion that includes funding, legal frameworks (secular and ecclesiastical) and a realistic strategic overview of the optimum use of the resources across England. The issues raised by the *Review* extend beyond the Church of England and require a wider discussion, perhaps a Government Commission or Task Force or some form of cross-sector partnership. We would be pleased to engage with you on the precise form this might take.

The *Review* makes no explicit reference to the National Planning Policy Framework (NPPF), under which the Ecclesiastical Exemption operates. The NPPF requires that proposals for changes to listed buildings should take economic, social and environmental issues into account. It also recognises the importance of sustainability and public benefit. Historic England strongly supports this approach to constructive conservation and would be happy to work with the Church of England to articulate this more clearly to help congregations understand the legal framework, national and ecclesiastical, within which they exercise their responsibilities.

We are concerned that there is very little reference within the report to the training of clergy so that they are better equipped to manage historic church buildings by the time they reach their first incumbency. Whilst in many situations the PCC bears the day to day responsibility, a greater understanding of the historic development of church buildings, including liturgical practice, would be a valuable contribution to local discussions. This was identified as the single biggest weakness of the Faculty Jurisdiction by those attending the recent Parish Church Interiors conference and Historic England is aware that the Cathedral and Church Buildings Division is actively engaged in developing relevant training.

The concept of 'Festival Churches' remains a concern to Historic England. Sharing responsibility with the wider community is clearly a reasonable proposal but no details of what this actually means are provided. The *Review* emphasises that there can be no single model, but that raises the spectre of wasted energies as each diocese develops its own definitions. The potential complexities of legal arrangements, involvement with a number of volunteer bodies, conflicts of interest and misunderstanding of the legal requirements under the ecclesiastical exemption mean there is a high risk of 'Festival Churches' falling through the gaps and becoming badly managed, neglected or even abandoned by the very safety net set up to protect their future.

Historic England strongly advises that checklists covering core items of concern are developed that would apply to all 'Festival Churches' e.g. explaining maintenance, security, risk to fixtures and fittings in intermittently heated buildings, responsibilities for regular electrical, lightning conductor, and fire extinguisher inspections. In addition, basic templates could be provided for the various legal frameworks, allowing for local variations but ensuring basic consistency across dioceses.

Whilst it is not our place to comment on the issues relating to parochial structures and organisation, we understand the Church's wish to consolidate both staff skills and the expertise of those who serve on Advisory Committees. We would be interested to learn more about the proposed Church Buildings Commission, including how it will relate to public interests beyond the Church of England and whether it will continue to include members nominated by DCMS.

Yours sincerely,

A handwritten signature in black ink that reads "Duncan Wilson". The signature is written in a cursive style with a large initial 'D'.

Duncan Wilson OBE
Chief Executive