

Historic Religious Buildings Alliance

We bring together those working for a secure future for historic religious buildings

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Michael Ellis, MP
Secretary of State for Arts, Heritage and Tourism
DCMS, 100 Parliament St
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20 Feb 2018

Dear Mr Ellis

English Churches and Cathedrals Sustainability Review (the ‘Taylor Review’)

I am writing as Chair of the Historic Religious Buildings Alliance (HRBA), an independently-funded group within The Heritage Alliance. The members of the HRBA include faith groups and charitable trusts who between them maintain almost all listed religious buildings in the United Kingdom.

To put this in context, there are about 20,000 listed religious buildings in the UK, of which some 60% are owned by the Church of England, with most of the remainder being churches owned by other Christian denominations and charitable trusts. A small number are owned by other faith groups, and our membership includes Jewish and Muslim representatives. About half of the listed religious buildings in the UK are designated at the higher grades of listing.

This letter is our response to the English Churches and Cathedrals Sustainability Review (the ‘Taylor Review’), which the Government published at the end of December. The details of our response are in the attachment to this letter.

In summary, the Review has been widely welcomed, as demonstrating the willingness of the Government to engage with the future of historic places of worship. To the best of our understanding this is the first time *ever* that any government has reviewed the future of church buildings, so the Review is an important landmark.

We are pleased that the community value of Church of England (CofE) buildings was given prominence. Every study of these churches has found that already they provide

significant community benefit but we agree there is always room to develop this further. Also welcome is the recognition of the importance of these buildings as heritage assets, as well as community assets. And the clear affirmation that ‘lottery funding is not a substitute for Government funding’ also seems to us to be a valuable reminder of fundamental principles in the context of the Review and its recommendations.

It is helpful, too, that the fact that major repairs to an individual historic church building will be needed from time to time (typically on a multi-decadal timescale), but are unpredictable and can be very expensive, is accommodated by the proposal of a Major Repair Fund. This is especially welcome at a time when HLF has ceased to provide ring-fenced repair funding for historic places of worship, and other funding is becoming tighter. We also appreciate the long-overdue promotion of maintenance up the agenda.

Nevertheless, we do have concerns about some aspects of the Review, and these are spelt out in the attachment to this letter, which also makes some initial observations about the relation of the Review to the buildings of other faith groups, and comments on certain aspects of the proposed pilot schemes.

Despite these reservations and uncertainties, we are supportive in general terms of the immediate recommendations and very much hope that the Government will see its way to carrying out an adequately-funded pilot. The HRBA and its members look forward to the opportunity to work with your officials as they consider the details of the recommendations.

Yours sincerely

Trevor Cooper
Chair, the Historic Religious Buildings Alliance
An independently-funded group within the Heritage Alliance

Attachment: Detailed Response to the Taylor Review

The response falls into four sections, of unequal length:

- General response
- Reservations
- Applicability beyond the Church of England
- Taking the pilot forward

Please note that Church of England cathedrals are outside the scope of our response.

General response

The Review has been widely welcomed, as demonstrating the willingness of the Government to engage with the future of historic places of worship. To the best of our understanding this is the first time *ever* that any government has reviewed the future of historic church buildings, albeit only those of the Church of England, so the Review is an important landmark.

We are pleased that the community value of Church of England (CofE) buildings was given prominence. Every study of these churches has found that already they provide significant community benefit but we agree there is always room to develop this further. The recognition of the importance of these buildings as heritage assets, as well as community assets, is also welcome. And the clear affirmation that ‘lottery funding is not a substitute for Government funding’ also seems to us to be a valuable reminder of fundamental principles in the context of the Review and its recommendations.

The particular attention paid to major churches is timely and reflects the growing understanding of this class of buildings; and we believe the report’s treating CofE cathedrals as a separate class of building shows realism.

The recommendations are broadly welcome, including in general terms (though with caveats) the proposals for Community Support Advisers (CSAs) and Fabric Officers (FOs).

It is helpful, too, that the fact that major repairs to an individual historic church building will be needed from time to time (typically on a multi-decadal timescale), but are unpredictable and can be very expensive, is accommodated by the proposal of a Major Repair Fund. This is especially welcome at a time when HLF has ceased to provide ring-fenced repair funding for historic places of worship, and other funding is becoming tighter. With ring-fenced funding for urgent fabric repairs to historic churches having been available since 1977 the change in the grants landscape over the past year has raised real concerns, not least the protection of the very considerable investment made over those years in getting fabric into sound condition.

We also appreciate the long-overdue promotion of maintenance up the agenda, and the suggestion of a Fund for this is well worth exploring as a way of helping to minimise the number of avoidable major repairs. The recommendation regarding Parish Councils and similar is also welcome, picking up as it does on our letter to Bernard Taylor on this matter submitted as part of the consultation process.

Reservations

Nevertheless, certain aspects of the Review concern us, and we feel we should put our reservations on the record.

Although we welcome the attention paid to community use, and the proposals made for helping develop it, overall we regard as too simplistic the suggestion that increased community use is the principal answer to the issue of making places of worship more sustainable.

The Review suggests that over time increased community use would reduce the burden on external funding. This may possibly happen. But it is noteworthy that the Review provides no evidence that increased community use of a church building does in fact reduce the call on external funds from those responsible for that particular building. It may be worth pointing out that neither Yarpole nor Malmesbury Abbey, two cases quoted in the Review, provide such evidence; indeed, rather the opposite.

In fact, contrary to the Review, and based largely on anecdotal evidence, we suspect that increased community use may sometimes make it *easier* for an individual church to apply for major repair grants, but *not* less likely that it will need to. From our experience, a significant reason is that major repairs to historic buildings are occasional, often unpredictable, and very expensive in comparison to the annual surplus of income (if there is one) or reserves, so it is natural to seek external support on the few occasions when such repairs are needed for an individual building, which will typically be once every few decades.

Nor in the Review is there any discussion of the likely rate of take up; nor, importantly, of the cost of rolling the programme out (we believe Yarpole cost more than £300k in today's money) or the timescale.

Worryingly, there is no estimate of the number of churches where this approach cannot apply. For many churches, the interiors will be too sensitive, or there may already be enough community buildings, or the population may be too sparse – in rural areas, the historic importance of a parish church probably bears no relationship to the size of the local community. It is no solution for the Review simply to label these as 'non-viable' with no further discussion. Indeed, by advocating just one approach to the problem, the Review seems to us to have side-stepped responsibility for two of the most difficult types of case – large and important urban Victorian churches, often 'stranded' through demographic or religious change; and those in rural areas with sparse populations, often with small congregations, which include some of the country's most important medieval buildings.

In short, community engagement is of worth for its own sake for all sorts of reasons, one being the increase in the number of people with a stake in the building, and the Review is entirely sensible to recommend that ways are explored of obtaining more community value from these buildings. This seems to us to be reinforced by the responses to the Review Consultation. (We feel obliged to point out, however, that the fact that there were large numbers of responses to the consultation does *not* mean, as claimed by the Review, that they were representative.) But we know of no evidence which demonstrates that rolling out this approach nationwide will reduce the long-term need for external funding for major repairs, even for those churches to which it applies.

Related to this, there is also concern amongst our members that grants from the new repair Funds might depend on the level of secular community use shown by a church, despite the clear assertion in the report (which we welcome) that ‘the need for public funding of maintenance and repair should be judged on the historic value of [the] building’. We think that allocating public funds on the basis of community use would be a very damaging step, not least setting up a damaging cycle of passivity and despair amongst those churches for whom community use is simply not an option, and would, we suspect, risk disengagement from those small congregations who are quietly using the building for its original purpose, and keeping it open and welcoming for visitors, and who are in every respect very much a going concern except for occasional extremely large repair needs. Generally any such suggestion would seem to us to privilege secular use over ongoing religious use. Furthermore, as discussed later, some religious groups would be excluded by such a trend.

The Review suggests that its approach to grant funding is more ‘strategic’ than existing approaches such as the current Listed Places of Worship Grant Scheme (LPOWGS), which refunds VAT expenditure. We want to make it clear that we do not agree with this – it hijacks the word ‘strategic’ without making the case. Like it or not, we live in a world where in England nearly half of our very highly-listed built heritage is looked after by volunteers who can walk away without warning, and in this context we think the LPOWGS is *extremely* strategic. It sends a message to these people that their efforts to keep these historic buildings in good repair are appreciated, and allows them to look donors in the eye and promise that none of their money will disappear in tax; and the scheme does not have the perverse incentives which so often apply to means-tested grants. Our members would be most concerned if, in order to create any new Repair Fund, the LPOWGS were to be reduced in its coverage, unless there had first been the most careful consideration and consultation. In this context, the very positive review of the LPOWGS carried out by English Heritage in 2010 would be a useful starting point.

In general, it is very disappointing that the Review explicitly ruled out consideration of other models of sustainability apart from increased community use. For example, there are perhaps lessons to be learnt from other European countries, including those Scandinavian countries who have been breaking the links between Church and State and have been considering the future of their church buildings. Scotland and Wales might both have been worth investigating. The Review describes the arrangements in

some of these countries in an appendix, but the body of the Review simply dismisses their applicability.

And within England, new models are emerging which we think are worth exploring and perhaps actively encouraging – models such as the transfer of some responsibility for the building to bodies other than the PCC, the increasing support from Friends groups, and the use of simple grants schemes for repairs (as with the Roof Fund, which found there were unanticipated community benefits from its grant scheme). We believe that these and other models could usefully have been considered within the terms of reference of the Review. Indeed, in its definition of sustainability the Review seems to have countenanced the idea that the body legally responsible for the upkeep of the building might not be the congregation, but the Review itself does not pursue this concept.

The Review could perhaps give the impression that it is entering virgin territory. To restore the balance, we have appended a draft list of some of the interventions of which we are aware, and which we think could usefully have been taken into account. Looking at these, we are reminded that one of the major problems is not the lack of useful projects, but the prevalence of large numbers of projects which are forced by the rules of grant funders to have fixed time-scales when the need is for continuity over a number of years. In addition to top-down interventions mentioned in our list, there has been considerable innovation on a local scale, one example being the rapid growth of Friends groups, now numbering more than nine hundred in England and Wales – this without any top-down intervention.

Applicability beyond the Church of England

The Review only looked at CofE buildings, not those of other Christian denominations or other religions, which in England represent approximately two thousand listed buildings.

We believe that the provision of repairs Fund or Funds funded by the taxpayer, as proposed by the Review, would be very welcome to those groups who refuse to fund repairs to their historic buildings from the proceeds of gambling.

In other areas the recommendations of the Review will need the most careful consideration and wide consultation with other faith groups (by which we refer here to other Christian denominations and other religions).

As we know you appreciate, many faith groups, some Christian, some not, are not able to use those buildings which are set aside for formal religious activities for the sort of secular community purposes outlined in the Review. This is for religious reasons which merit both understanding and respect. For example, this is the case for the Catholic Church, for whom the whole of a church is considered to be a sacred space which cannot be used for alternative or additional uses. There are congregations, too, within the Church of England which take a comparable view. It is important to appreciate that a similar approach to the proper use of such space is taken both by other Christian denominations and by some non-Christian religions. The

Review places great emphasis on increasing the secular community use of places of worship but this is simply not possible for many religious groups. It may be worth pointing out that restrictions are sometimes embedded in the Trust documents or the overarching rules (for example Canon Law) which govern the use of their buildings by such faith groups.

There is a further complicating factor. Many faith groups organise extensive social activities in ancillary accommodation (meeting rooms, halls etc), rather than the room or building set aside for explicitly religious purposes. And many hire such accommodation out to the public for various uses. We would be concerned if more value was attached to community activities organised within the 'sacred space' than those held within ancillary accommodation or outside the building altogether. Any such distinction would seem to be based on a stereotype of a rural CofE church. The reality is that many urban CofE congregations and other faith groups have, and make extensive use of, ancillary accommodation.

Finally we note that the word 'community' was defined by the Review as applying only to those who 'live locally' (see definition of terms). We would be most concerned if this became a general definition in this context. Of course, for a good many CofE churches, the idea of its community being the group of people whose homes are close to the building often does make sense, because for historical reasons many places with a distinct identity do indeed have a CofE church building which people live near and can recognise as being associated with their area. Even so, a good many urban CofE churches would not see their 'community' in those terms. And for many other faith groups, this concept of community being those who 'live locally' is misleading and unhelpful. These are gathered groups, so the communities they serve may be physically dispersed, and as likely to be defined, for example, by ethnicity or religious-identification as by living close to the building. (As a result, many of these congregations serve hard-to-reach groups.) We would be concerned if government action following the Review discriminated against community engagement with such groups simply because the community being engaged with has some common characteristic other than living locally.

Overall, we think it is important that any government action following the Review does not discriminate against non-CofE faith groups. Early discussion with such groups suggests that they may cautiously welcome pilot schemes for Community Support Advisers and Fabric Officers, but only if the job description to which these individuals work is not constrained by CofE needs.

Taking the pilot forward

We welcome the suggestion of a pilot scheme or schemes and would be happy to work with the Government if, as we hope, it implements this proposal.

We suggest that at least one of the pilots covers all Christian denominations and other religions within a pre-defined area, not just CofE congregations. This would mean that the proposals in the Review were being tested with non-CofE groups. And it would also help provide a more holistic view of community needs and opportunities

and how they are being met in an area, rather than looking at what is provided by one particular religious group.

This would have implications for the training of those undertaking the role of Community Support Advisers, because they would need to understand how each of the faith groups operated and differed from one another. The wide experience of the many people who are already carrying out very similar roles should be drawn upon to give the pilot the greatest chance of success. We think anyway that the job descriptions of the CSAs and FOs could usefully be given further attention, and would be happy to discuss this with you.

The pilots are intended to test certain ideas, and we would strongly encourage careful planning from the beginning of how they will be assessed and what information should be gathered. We are sceptical of the ability of the pilots to answer some of the bigger questions raised by the report, but believe that with careful planning some valuable insights should emerge. Amongst other matters we would hope there would be greater understanding in both central urban and deeply rural areas of the number of religious buildings and congregations who might be in a position to introduce more community activity, taking account of the restrictions on this discussed earlier, and of its likely need for investment and manpower.

* * *

We are aware that much of this detailed response expresses reservations about the Taylor Review, and we do feel it is important to put our concerns on record.

In addition, the implications of the Review for faith groups other than the Church of England still need the most careful consideration and wide consultation.

But we hope it is also clear that we are supportive in general terms of the recommendations, and very much hope that the Government will see its way to carrying out an adequately-funded pilot scheme. The HRBA and its members look forward to the opportunity to work with Civil Servants as they consider how to progress the recommendations.

20 Feb 2018
Historic Religious Buildings Alliance
www.hrballiance.org.uk

Working list of interventions and schemes draft a5

Working list of ‘interventions and schemes’ aimed to help listed places of worship in England

Draft a5: February 2018 Produced by HRBA hrballiance.org.uk Contact: hrb@theheritagealliance.org.uk

This draft working list of ‘interventions and schemes’ aimed to help listed places of worship in England was produced over a period of five days by HRBA. It will contain errors and gaps, but it is hoped it will be useful, not least in giving some idea of the scale and nature of intervention that has taken place in the past ten or so years. Please note that the brief descriptions are ours, and have not been checked with those running the project – they should be taken as quick and dirty guidance as to the nature of the project, and may be misleading.

Some of these interventions were driven by national bodies, others by regional or local ones. Some interventions, particularly those related to tourism, were time-limited to a few years by the funding agency. Others were or are longer-lived.

The list deliberately **excludes**:

- Single building projects
- Projects outside England
- Cathedral projects
- Churchyard projects
- Research projects (unless it is action research, i.e. intervening)
- ‘How to do it’ resources for the user to pull down as needed (of which there are a great number, many of high quality)
- Projects relating to a single place of worship (of which there are a huge number)
- Consultancy paid for by the user (unless there is an interesting project in place)
- Heritage open days and other general tourist events
- Organic developments, such as Friends Groups and the introduction of Post Offices, which are not driven by a specific project

The third column contains ad hoc notes. In particular we have tended to give the website only when we looked it up ourselves to check something, and many projects do have websites even though not given here; generally they are easily found with an internet search. In a few cases we have noted where an independent formal review has been carried out, but we will almost certainly have overlooked some such reviews.

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What	Nature	Comment/further info
Maintenance / minimising future damage		
Maintenance Booker	Maintenance framework contracts and central booking And list of approved contractors	National Churches Trust
Maintain our Heritage	Research, advice, advocacy	https://www.maintainourheritage.co.uk/
Maintenance consultancy	Providing maintenance support	CCT
Faith in maintenance	Training in maintenance	SPAB, HLF supported
Maintenance co-operatives	Setting up local maintenance co-operatives	SPAB, HLF supported
Local maintenance schemes, including London, Gloucester, East Anglia (various)	Maintenance framework contracts etc	https://www.london.anglican.org/kb/gutter-maintenance-programme/ https://www.gutterclear.org/ and https://www.gutterclear.org/about-us/
Dealing with bat droppings / mitigation success of bats in churches	Research into mitigating damage from bats	e.g. http://www.batsandchurches.org.uk/recent-research/
Design for wider use		
'Empowering Design Practices; Places of Worship as catalysts for Community'	Action research	Open University with HE, HLF and HRBA
Regen team	Advice on regeneration	CCT
Advice for wider use, including commercial use	-	Various providers (please ask)
Grants for facilities		
Grants for facilities and community use	Grants for facilities and community use	Various providers (please ask)
Rural churches in community service	Grants for facilities	A millennium project which has good longitudinal studies of its impact. Formally reviewed (twice).
Grants for security		

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Security Funding Scheme	-	https://www.gov.uk/guidance/places-of-worship-security-funding-scheme
Grants for roof alarms	-	Various providers (please ask)
Grants for objects		
Conservation of objects	Grants towards conservation of particular objects	Various providers (please ask)
Grants for fabric (sometimes mixed with facilities)		
Fabric repair grants from non-public money	Grants for fabric repair, mostly competitive	Various providers (please ask)
GPOW and predecessors public ring-fenced schemes	Grants for major fabric repair, mostly competitive	First government and its agencies, latterly HLF. GPOW undergoing formal review.
Roof Fund x2	Grants for roofs, competitive	Government. Formally reviewed.
Listed Places of Worship Grant Scheme	Non-competitive VAT refund	VAT refund, Government. Formally reviewed.
General HLF schemes	Various purposes, including huge repairs	Non-ring-fenced HLF funding
Ride and Stride	Nationwide bike-ride/walk; self help	http://www.rideandstrideuk.org/
Historic Churches Trusts	Almost one per county; variable levels of activity; provide funding, advice based on local knowledge	List at https://www.nationalchurchestrust.org/node/3508
Aggregates Sustainability Levy	-	-
Landfill Tax Credits	-	-
Competitions		
Heritage Angels award	Volunteer competition – no longer has specific category for POWs	Administered by HE
King of Prussia Gold Medal	Work on the fabric of churches	National Churches Trust and EASA
John Betjeman Award	Work on the fabric of churches	SPAB
Best modern church award	-	National Churches Trust and EASA

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Marsh Church and Community Volunteer Awards	Looking for those who have significantly made a difference to sustainability of church building	Marsh Christian Trust and NCT
Marsh Innovative Church Projects Awards	Positive impacts of installing new facilities	Marsh Christian Trust and NCT
Christian Funders' Forum Awards	Social/community projects run by faith groups (not all necessarily within church buildings)	CFF http://www.cinnamonnetwork.co.uk/christian-funders-forum-awards-2017/

Expert support, intervention in cases, bringing together

Support Officers for Historic Places of Worship	Locally based. Sometimes branded	HE scheme providing time-limited part-funding, sometimes continued by dioceses etc fully funding
Inspired North-East	Originally Durham and Newcastle, now just the latter	Originally HE, now funded by CofE. Various activities including acting as hub for other projects
Open Churches Trust	Encouraged opening of churches, training etc	Now closed.
Cumbria Churches Trust	-	-
Inspired!	Publicity and advice, nationwide	English Heritage
Guidance for chapels in Cornwall	Advice applicable to all NC buildings	HE
Taking Stock reviews	RC, Quaker, some CofE	Assessment of each building in a region (HE)
Realising the Potential	Central government liaison and published advice	Central government
Norwich Diocese Ambassador's scheme	Puts experienced local people in contact with those needing advice	-
One church, one hundred uses	Advice on wider use	Private initiative
Inspired Futures	Hands-on consultancy/training for eighteen churches in north-east	HLF

Ownership models, community responsibility

Growing the rural church (Exeter)	Includes new models for caring for churches	Exeter diocese, ongoing major project
Church Trusts	Responsible for groups of church buildings	CCT (national), and several other regional ones (please ask).

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Tourism / education / arts / events

Champing	Overnight stays in churches	CCT and franchise to others
Altered	Contemporary art in ancient churches (East Anglia)	http://alteredartsproject.weebly.com/
Art Alive in Churches	East Anglia	https://www.facebook.com/Art-Alive-in-Churches-Norfolk-Suffolk-and-Cambridgeshire-423020274456955/
Art in Romney Marsh	Art in churches	-
Music in Quiet Places	Herefordshire music events	http://www.hhct.co.uk/music-in-quiet-places/
Explore Churches	Active national website of what to visit	National Churches Trust
Keyholder	App for visiting churches in England	https://www.parishchurches.org/keyholder-app
Friends of City Churches	Large volunteer group providing church sitters etc	London
Angels and Pinnacles (Suffolk)	Themed church tourism	http://angelsandpinnacles.org.uk/
Spires and Steeples Arts Heritage Trail (Lincolnshire)	Tourist trail, events	http://spiresandsteeples.com/
Spirit in Stone	North-east England; website, trails, education etc	http://www.spiritinstone.co.uk/
Cascade (Lincolnshire)	Tourism – cascading from larger, touristy churches	-
Cascade (Northamptonshire)	Tourism – cascading from larger, touristy churches	-
Sacred Sussex	-	-
Treasures Revealed in West Yorkshire Churches	-	-
Go West Teme Valley	-	-
Treasures Unlocked	Leicester, churches located to existing attractions	-
Discover Shropshire churches	Publicity	http://www.discovershropshirechurches.co.uk/
Visit Herefordshire churches	Publicity	http://www.visitherefordshirechurches.co.uk/
Broads and Rivers Open Churches Project	Publicity	https://www.visitnorfolk.co.uk/info-brochures.aspx

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Heritage Inspired	South Yorkshire multi-faith tourism	http://www.heritageinspired.org.uk/index Formally reviewed.
North West Faith Tourism	Multi-faith tourism	-
Open Church Network (Wrexham)	Publicity	http://www.wrexham.gov.uk/english/leisure_tourism/open_church_network/index.htm
Small Pilgrim Places Network	website, tourism to smaller, quieter places of worship	http://www.smallpilgrimplaces.org/
Cumbria	Churches Trust for Cumbria did tourism trails etc	-
Notts Open Churches	website, tourism and education	http://www.nottsoopenchurches.org.uk/
Derbyshire churches	website, tourism	http://derbyshirechurches.org/church/buxton-st-mary
Discover Sacred Lancaster	trail around Lancaster	-
Liverpool Walk of Faith	trail around Liverpool	-
York City Centre Churches	app for mobile phone	-
Churches tourism week	a week of open churches and activities	https://www.visitchurches.org.uk/what-s-on/church-tourism-week.html
West Lindsey churches festival	two weekends of open churches	http://www.churchesfestival.info/p/brochure_28.html
Horncastle and villages churches festival	a weekend of open churches	http://horncastlechurchesfestival.co.uk/
Holland (Lincs) places of worship festival	a weekend of open places of worship	http://www.hollandpowf.org.uk/POW%20brochure.pdf
Diocese of Norwich Open Churches Week	a week of open churches, events etc	https://www.dioceseofnorwich.org/visiting/open/
Worcestershire and Herefordshire Festival of churches	a weekend of open churches	-