

Have your say on the future of UK heritage

The response of the Historic Religious Buildings Alliance to the NLHF consultation on its strategy, September 2022

1. Before starting the survey, please let us know if you are sharing your own views or responding on behalf of your organisation? [select one] *

- My own views
- On behalf of organisation

2. Where are you / your head office based? [select one]

- Scotland
- Wales
- Northern Ireland
- England: North East
- England: North West
- England: Yorkshire & the Humber
- England: West Midlands
- England: East Midlands
- England: East
- England: South East
- England: South West
- England: London
- outside of the UK

About you and your organisation

3. What is the name of your organisation?

Historic Religious Buildings Alliance (HRBA)

4. What is your job title / role?

Chair

5. Where do you operate? [select all that apply]

- England
- Scotland
- Wales
- Northern Ireland
- overseas/global

6. Which one of the following best describes the type of heritage you support or manage? [select one]

- community Heritage
- historic buildings and monuments
- industrial, maritime and transport
- cultures and memories (intangible heritage)
- landscapes and nature
- collections (museums, libraries and archives)
- sector support (supply chain, advocacy, training)
- none of the above

7. Do you support any other types of heritage as well? [select all that apply]

- no
- community heritage
- historic buildings and monuments
- industrial, maritime and transport
- cultures and memories (intangible heritage)
- landscapes and nature
- collections (museums, libraries and archives)
- sector support (supply chain, advocacy, training)

8. How many employees work for your organisation? [select one]

- sole trader
- 2 to 9
- 10 to 49
- 50 to 249
- 250+
- don't know

UK heritage and Heritage Fund support

9. What are the top 2 or 3 changes to heritage you would like to see in 10 years' time? Please focus on the heritage that you are responsible for.

9.1 BACKGROUND

About us

The Historic Religious Buildings Alliance brings together those seeking a secure future for historic religious buildings. Our members include organisations who own and maintain almost all the approximately 20,000 listed religious buildings in Great Britain. To give some context, in England about 45% of all Grade I and Grade II* listed buildings are historic religious buildings.

About historic religious buildings

Religious buildings and their ancillary accommodation provide a home for activities which bring people together, strengthen social ties, promote wellbeing, and provide support to some of the most vulnerable people in society – at a local level, and in all communities, including the most deprived. This became obvious during the pandemic. In addition, they are a major supplier of rooms for hire for local groups, an essential element of any thriving community.

Often these buildings contribute significantly to a sense of place and local identity. Many are places of shared memory. The buildings – and the works of art they contain, often of museum quality – form an essential part of our national cultural heritage, of international significance, a fact widely recognised in the promotion of tourism.

In most cases each of these buildings is cared for – and paid for, out of their own pockets – by a local volunteer group, which we will refer to generically as ‘congregations’.

For the most part this heritage is freely available to all. Thousands of these buildings are left unlocked every day for anyone to look around, and most historic religious buildings are straightforward to enter and enjoy, free of charge.

For the great majority of congregations, there is modest or negligible income from tourism – partly because it is difficult to monetise visitors to an unattended building, but mainly because of a strong tradition of hospitality, and a deep sense that these are buildings for the benefit of everyone, and should be available to all. (A very small number, such as some Anglican cathedrals, collect an entrance fee, but this is a tiny percentage of the whole.)

About congregations

The congregations caring for historic religious buildings differ greatly, but share important features.

- The need to maintain and adapt a listed building, often with a sensitive interior, for routine use.
- A reliance on voluntary giving, with fund-raising organised by volunteers.
- A shortage of capital resources, and the inability to use their building as security for borrowing.
- Often, the sense that they are inadvertent custodians of cultural heritage to the benefit of the wider community, though largely paying for it out of their own pockets.
- For many non-Christian faith groups and some Christian denominations, an understanding that a place of worship may only be used for religious purposes, which militates against promotion of their building as a heritage attraction.
- For most, an organisation which is optimised and resourced for religious, congregational and community activities, not one whose core purpose is maintaining heritage.

9.2 CHANGES WE WOULD LIKE TO SEE

CHANGE 1: Substantial, predictable, straightforward financial support for major capital expenditure for historic religious buildings

The Review of the Listed Places of Worship Roof Repair Fund (National Heritage Memorial Fund, 2017) confirmed that funding roof repairs in a simple way ‘played a key part in saving important listed buildings that would now be protected for another hundred years’. It also found that the money thus freed up was used by congregations for community activity and engagement.

The Taylor Review (DCMS, 2017) concluded there is the need for a new source of capital funding for the sector for major repairs, and for upgrading work such as heating, lighting, toilets and kitchens to make historic place of worship more usable and thus more sustainable.

Keeping these buildings in good condition and usable for an appropriate purpose for future generations is the first priority.

CHANGE 2: Support for those caring for historic religious buildings

It is astonishing that such a high proportion of the nation’s built heritage is in the hands of volunteer groups who meet together for an entirely different purpose, and are organised and funded accordingly.

There is a lack of centralised, coherent, long-term messaging and support for these groups. What is available is fragmented and seriously under-funded.

This is particularly worrying as the downward drift in average size of congregation is encouraging innovative approaches to the care, management and ownership of these buildings, such as Friends Groups, Festival Churches, and Community Trusts. Furthermore, as Taylor pointed out, certain legal obstacles in this area need to be removed.

Supporting those who care for these buildings, and removing the legal obstacles, is likely to be an investment that pays for itself many times over.

CHANGE 3: Increased focus on inherent cultural value of heritage, with expert input

Many historic religious buildings are in tiny communities. In England, about 20% of churches, almost all of them listed, are in places – mostly villages and hamlets – where just over 1% of the population live. That represents 3000 churches. The average population for these communities is about 200 people, who are bearing a hugely disproportionate burden of caring for the nation’s built heritage.

If head-count is a criterion for grant funding, then these buildings – some of the most beautiful and historically important in the country – face a bleak future.

We would like to see historic religious buildings – indeed, all heritage buildings – being valued for their own sake, with a view to the pleasure and well-being of future generations, rather than their potential for incremental increases in community engagement via project activities.

We believe that there needs to be more focus on inherent cultural value, and that this will require expert input both as to policy and practice.

A note on environmental sustainability

We have not included environmental sustainability as a ‘top change’. This is because we believe that the present intentional focus on these issues will do the job. Some funding will be necessary, and can be part of wider investment in heritage.

10. What would you most like to change in relation to heritage in the next 3-5 years? Please focus on the heritage that you are responsible for.

10.1 ACHIEVABLE CHANGES

We believe that the following concrete changes are achievable over the next three to five year, if all the players in the sector (including government) work together.

Each of them supports one or more of the three long-term changes outlined above (capital funding, support of those caring for buildings, cultural value of heritage).

10.2 CAPITAL FUNDING

1. Introduction of a capital fund dedicated to historic religious buildings, to provide stability and predictability. Condition of the buildings should be the priority, with a focus on preserving and enhancing heritage value, and making the building more sustainable.
2. Abandonment especially for smaller and more remote places of worship of the implicit ‘community use’ sustainability model, which such buildings are never going to achieve.
3. Recognition that for many non-Christian faith groups, and some Christian denominations, on religious grounds the use of the building for secular purposes is not acceptable, a view which is deserving of respect and understanding.

10.3 SUPPORT OF CARERS

4. Consistent support and messaging to be available from a single point of call, with local or regional support. This needs commitment and long-term funding.
5. Explicit acceptance that historic religious buildings are often looked after by volunteers, and has implications for application processes for grants, and for required outcomes.
6. More systematic support for, and encouragement of, routine maintenance.
7. The removal of inappropriate legal and regulatory barriers, to allow innovation to flourish.

10.4 CULTURAL VALUE OF HERITAGE

8. Acknowledgement of the cultural value of built heritage, and in particular of historic religious buildings, quite apart from ongoing social and community benefit.
9. Input of expert partners to funding decisions and overall heritage policy in the sector.

10. Explicit awareness in decision-making processes of the existential risk if major repairs are not carried out, and a renewed focus on the importance of preserving built heritage for *future* generations, not just the current one. NOTE: This requires explicit attention to be paid to the number of people over the next one hundred years who will NOT be able to enjoy a building if it is lost. For example, just one visitor a day enjoying a remote rural building for the next century is thirty thousand people.

11. How can the Heritage Fund play a role in those changes?

The Heritage Fund plays a crucial role in the heritage sector, and its contribution to historic religious buildings over the years is greatly valued. Nevertheless, at present there are serious difficulties.

11.1 BACKGROUND

Funding background - general

In most cases, volunteer congregations successfully pay for maintenance and significant repairs out of their own pockets and through local fund raising, spending an estimated £150m to £200m per annum on listed religious buildings.

Typically, for any given building difficulties arise only about once every twenty or thirty years, when a major repair is required. This is when a congregation requires one-off financial support, typically in the range £50k to £250k, though this can be more, particularly on larger buildings.

The total cost of providing such occasional support for major repairs is perhaps £40m to £50m per year across the country.

Change to funding in 2017

In 2017 the NLHF stopped its GPOW scheme. This had provided a dedicated pot of funding for listed places of worship of some £30m per year.

In that year the amount invested by the NLHF in places of worship (excluding cathedrals) was £28m, lower than the average of £43m over each of the previous years.

By 2019 the annual amount had fallen by almost two-thirds, to about £10m.

The Heritage Fund is more or less the only funder capable of investing in major repairs. As the Evaluation of GPOW (NLHF, 2020) pointed out, ‘without some form of external funding, it is difficult for projects to progress’. So this collapse in funding has been calamitous. [Disclosure: two of the authors of this Evaluation are attached to HRBA.]

Professionals working in the field now routinely tell congregations not to bother applying for a NLHF grant, as they will not meet the criteria. NLHF staff in the field are giving mixed messages but generally discourage applicants, except for the few cases where large numbers of people are engaged with the building.

We are now hearing of churches facing closure because they cannot obtain a repair grant.

11.2 CURRENT ISSUES

There are five issues with the current model.

ISSUE 1: Need for up-front funding

One issue is that many congregations are not well positioned to pay a professional to write an application for an uncertain outcome. As we pointed out above, congregations are self-funded volunteers, often with minimal capital reserves. They often find themselves competing against dedicated heritage organisations, such as museums, who have salaried professional staff on hand to write the application.

ISSUE 2: Case by case comparison using identical set of outcome criteria

More fundamentally, NLHF chooses between grant applications by using a single set of desired outcomes across all sectors on a case by case basis.

The analogy would be a government which decided between spending on a new school, a new hospital, a new road, or a new weapons system *on an individual case by case basis and using an identical set of criteria*. The idea is ridiculous.

Instead, governments prioritise their spending at a high level by allocating budgets to different departments, who then make decisions based on criteria relevant to their specific needs.

The same approach is needed for historic religious buildings, with a dedicated ‘budget’ and relevant criteria.

ISSUE 3: Ignoring the impact of the counterfactual (closure)

The current process ignores the fact that a major repair to a historic building will enable generations of people to enjoy the building who otherwise would not be able to as it would be shut. Instead, the NLHF’s current decision processes appear to assume the building would anyway have stayed open, and then look for extra impact.

ISSUE 4: Ignoring current social benefits

Using the Treasury methodology, the recent *House of Good* report (National Churches Trust, 2021) valued the social benefits of activities taking place in churches at more than £12bn per year.

Unfortunately, the social benefits which faith groups bring to public life through fulfilling their core purpose, and which rely on having a building in good condition, are it seems not taken into account in NLHF processes. Instead congregations are expected to devise new, short-term heritage activities, outside their normal skill set.

It should be recalled that the Review of the Roof Fund found that repairing heritage releases money and energy for community engagement.

ISSUE 5: Impact of NLHF reduced funding

There is no other source of large funding to preserve these important buildings, so a good deal of repair work is not being carried out.

Other funders are often happy to support projects with match funding once NLHF funding has been secured. With the post-2017 collapse in NLHF funding, this important source of match funding is also much reduced.

11.3 HERITAGE FUND ROLE IN BRINGING ABOUT CHANGE

1. Funding and expert advice

We believe strategic funding would go a long way towards resolving the five issues identified above.

So we would encourage NLHF to consider allocating strategic funding to historic religious buildings. We note that dedicated funding is already in place for some projects, and more may become necessary to operationalise the priorities discussed below.

If this is not possible, then we would encourage NLHF to consider how to level the playing field between voluntary organisations (such as places of worship) facing an existential threat, and those organisations whose set up provides access to heritage professionals, and whose applications are for new activities because their buildings are not at existential risk.

In either case, the application processes, and the outcomes required, should be reviewed with sector experts.

As part of this change, we would also like to see further encouragement for routine maintenance.

2. Support

We would encourage NLHF to work with the sector to consider whether it could fund long-term investment in support for congregations.

3. Tracking

Finally, we hope that NLHF senior management track the nature of the heritage that is being funded, to understand the impact of their policies on different types of heritage.

12. Beyond funding, what other support can the Heritage Fund provide that would achieve those changes? Examples include consultant support, sharing best practice across organisations, cohort learning and/or building partnerships with other funders.

Co-operation

There is room for more co-operation with other funders. We would not presume to say what the outcomes of this would be, but it might include agreement on definitions, and standardisation of application requirements.

Messaging

We have been concerned about the variability of messaging on grants to places of worship between Heritage Fund regions, and it would be helpful if this were tidied up.

Data

The *'Tailored Review'* of NLHF (DCMS, 2017) recommended that HLF should make its data available as Open Data. We appreciate there is at present a public access spreadsheet of grants, but this is difficult to use and does not codify the nature of the grants. It would be helpful to us and perhaps others if this information were produced in a form more suitable for interrogation and analysis. We would be happy to discuss this with NLHF.

Consultant support

We are not in favour of the NLHF providing consultant support. As an NLHF consultant would be the preferred port of call for those hoping to obtain funds from the NLHF, it would distort the market and would probably crowd out private provision. Chinese walls would need to be set up within NLHF, which is not trivial to do in a way that promotes confidence. There would probably be a deleterious effect on innovation. In the commercial world, it might be argued that providing consultancy was uncomfortably close to a misuse of market power.

A possible exception is in the specialist area of writing NLHF applications, on which NLHF are expert. Even here, for the above reasons we would prefer NLHF to provide funding for private consultants, rather than consultancy.

Standard of work

The Evaluation of GPOW, referenced earlier, pointed out that some work funded by GPOW was not of an acceptable standard. There is no particular reason to suppose that matters are different now. We would encourage the NLHF to insist on suitably qualified professional advisors and contractors.

13. Tell us what you think about our existing priorities for heritage (landscape and nature, community heritage and heritage at risk) and our current funding approach as set out in our Strategic Funding Framework 2019-2024?

Priorities

We are content with the priorities.

The focus on heritage at risk is crucial - once heritage is lost, it is gone for ever.

Impact

We are not certain how the priorities are operationalised. The flow through from the priority 'heritage at risk' to 'objectives' and thence to 'outcomes' seems weak and somewhat opaque at the moment.

In particular, if 'heritage at risk' is one of three priorities, why does it form such a small proportion of the outcomes, and why is that outcome not mandatory?

Tracking

We are not certain that data is collected to track whether these priorities are being met. If not, this may be worth considering.

Objectives and outcomes

14. In our current Strategic Funding Framework, we have six objectives and nine outcomes. We propose to revise the wording of the six objectives to:

Ensure:

- a better future for the UK's heritage
- heritage is a source of inspiration and enrichment
- heritage is for everyone
- heritage is valued, resilient and sustainable
- heritage enables people and places to thrive
- local economies are strengthened through heritage

Changes to the objectives may lead to subsequent changes in the nine outcomes.

Do you broadly agree with the revised objectives?

Ensure better future for the UK's heritage

- strongly agree
- agree
- neither agree nor disagree
- disagree
- strongly disagree

Ensure heritage is a source of inspiration and enrichment

- strongly agree
- agree
- neither agree nor disagree
- disagree
- strongly disagree

Ensure heritage is for everyone

- strongly agree
- agree
- neither agree nor disagree
- disagree
- strongly disagree
-

Ensure heritage is valued, resilient and sustainable

- strongly agree
- agree
- neither agree nor disagree
- disagree
- strongly disagree

Ensure heritage enables people and places to thrive

- strongly agree
- agree
- neither agree nor disagree
- disagree
- strongly disagree
-

Ensure local economies are strengthened through heritage

- strongly agree
- agree
- neither agree nor disagree
- disagree
- strongly disagree

Objective 1 ‘a better future for the UK’s heritage’

We oppose the change to the first objective. This should remain ‘continue to bring heritage into better condition’ rather than ‘a better future for the UK’s heritage’, because:

- The notion of ‘a better future’ wraps up a number of issues, and will inevitably dilute the simple – and essential – issue of the condition of the heritage. Once heritage is lost, it is gone for ever, and heritage being in good condition is crucial to its continuance.
- As the NLHF website points out, ‘professional and heritage specialists will be able to recognise improvements [in condition]’, so there is a degree of objectivity there lacking from the idea of a ‘better future’
- The other objectives will help bring about a better future, and it does not need its own objective.

For the same reason we would object to any change of the associated Outcome.

If there are overriding reasons why this Objective cannot remain as ‘continue to bring heritage into better condition’, then we would propose a direct lift from one of the strategic priorities, with the Objective becoming ‘*heritage is less at risk*’.

Objective 2 ‘heritage is a source of inspiration and enrichment’

We support the change from ‘inspire people to value heritage more’ to ‘heritage is a source of inspiration and enrichment’.

This is in line with our aspiration for an increased focus on the inherent cultural value of heritage, and is one that historic places of worship are well placed to meet.

Objective 3 ‘heritage is for everyone’

We support the change from ‘ensure that heritage is inclusive’, not least as it reflects the tradition of hospitality and open welcome which is the norm for congregations looking after historic religious buildings.

Objective 4 ‘heritage is valued, resilient and sustainable’

Broadly we support the change from ‘support the organisations we fund to be more robust, enterprising and forward looking’.

We particularly welcome the emphasis on heritage itself being valued, in line with our aspiration for an increased focus on the inherent cultural value of heritage.

We also welcome the support this provides for NLHF investment in sustainability, which in our context often means simple things like heating, lighting, toilets and kitchens.

However we would have preferred ‘heritage is *more* valued, resilient and sustainable’. First, we think this is more realistic. Secondly, we are nervous that the objective as stated will encourage NLHF to introduce a new hurdle for individual grant applications - namely that congregations have to pass a test of economic and social sustainability, which is a difficult thing for any voluntary group funding itself, and even more so for smaller and more rural congregations.

Objective 5: heritage enables people and places to thrive

We welcome the change from ‘demonstrate how heritage helps people and places to thrive’ as the new objective focuses on the thing itself, not demonstrating it.

Objective 6: local economies are strengthened through heritage

We welcome this change from ‘grow the contribution that heritage makes to the UK economy’.

Many historic religious buildings have local impact, and this new objective plays to that strength. We note, though, that measuring that impact can be difficult.

Consultation on Outcomes

We appreciate the thought that has gone into the revised objectives.

However it is the Outcomes which we believe to be the main drivers of grant decisions, so the flow through from Objectives to Outcomes will be crucial.

We hope the sector will be consulted on Outcomes.

What do you think is missing from these objectives?

There may be room for a new objective along the lines of:

- *‘Those caring for heritage feel appreciated’*

Priorities: Place

15. We expect to be doing more to prioritise and invest in places that have a greater need, opportunity and/or potential for heritage. What information should help us shape that emphasis?

Select the three that are most important to you. [Select 3]

- heritage needs
- social and economic needs
- opportunities for the Heritage Fund to align with other funders and partners
- the potential of heritage in an area
- readiness of a place for partnership and investment (for example: existing delivery networks, stakeholders, etc)
- low levels of engagement with heritage, especially among under-served groups
- other (please state)

Other

We would suggest adding 'other': '*local need for inspiration and enrichment through heritage*'. This aligns with Objective 2, and encapsulates what is special about heritage compared with other drivers of regeneration.

Priorities: Approaches to funding

16. We currently deliver the majority of our funding through our open programmes, National Lottery Grants for Heritage. Looking ahead, we are planning to make larger scale investments and direct some funding to issues or types of heritage where there is a strategic need.

Do you agree we should invest at a larger scale (over £5million) where our investment will have a greater impact?

- yes
- no
- don't know

LARGER SCALE FUNDING

The question about larger-scale funding is strangely worded. Does it refer to impact per pound spent?

Cathedrals and the relatively small number of other large religious buildings need predictable, large-scale funding, sometimes over five million pounds. Development and regeneration projects can also be very expensive.

However a substantial part of grant funding for historic religious buildings should be smaller-scale and responsive, meeting actual need as it arises, via a dedicated scheme. Evidence suggests that repair grants between £50k and £250k are an extremely effective use of available funds, though larger repair grants are sometimes required, and sometimes benefit from being delivered sequentially.

Do you agree we should direct more of our funding to specific issues or types of projects in line with specific strategic need?

- yes
- no
- don't know

What issues or types of projects, if any, do you see as needing dedicated or targeted funding?

Our 'yes' regarding specific issue applies to projects which have been widely consulted on with sector experts

As we have argued above, strategic funding should be set aside for historic religious buildings.

If this is not possible, then – again as argued above - we would encourage NLHF to consider how to level the playing field between voluntary organisations and those organisations set up to have access to heritage professionals.

In either case, the application processes, and the outcomes required, should be developed with sector experts, including Historic England, Cadw, Historic Environment Scotland and the NI Department for Communities. The intention should be to support heritage everywhere even in tiny communities.

Again as discussed earlier, consistent support and messaging needs be available from a single point of call, with local or regional support. This needs commitment and long-term funding.

17. The cost of living crisis and rising inflation are resulting in increased costs for many heritage projects. Thinking about what would most benefit the heritage you support, what balance should we strike between investing in existing funded projects and supporting new projects over the next three years?

- keep the balance as it is currently
- re-balance to increase support for existing projects
- re-balance to increase investment in new projects
- none of the above (please specify below)
- don't know

Please provide any comments you want to add to your response above.

Most projects in historic places of worship are run by those with little or no experience of running a project (as shown by the Evaluation of GPOW). Furthermore, most congregations cannot provide security to take out a loan, and cannot increase their income through more aggressive marketing to visitors. These factors will weigh heavily on them as inflation bites.

For existing projects, we would suggest allowing flexibility in the actual outcomes, and perhaps the re-allocation of expenditure within the project.

For new projects, we suggest de-risking projects, by reducing their required outcomes and perhaps focusing on sustaining existing heritage; and then maintaining flexibility as the project progresses.

Priorities: Partnerships

18. We are looking to deliver our objectives both through our existing investment mechanisms (Lottery funding and Grant in Aid) and, where appropriate, through more partnership work with other organisations.

How do you think the Heritage Fund will need to change about how we work to shift from grant giver to partner?

More working with experts to set priorities

The NLHF should actively seek out knowledgeable partners to set priorities, reviewing with those partners the alignment and relative weights of the Heritage Fund Outcomes with the actual needs of the sector.

In general the NLHF should consult deeply with the sector before instigating change.

Further exploration of partnering in delivery of grants

NLHF might partner with other grant-giving bodies, for example to benefit from their sector knowledge, agility and focus, and to increase reach. (This might reduce administration costs). However it would concern the sector if NLHF used its hegemony to influence grant flows funded by other providers.

NLHF might also partner with other grant-giving bodies which fund different elements of activities e.g. the Heritage Fund might focus on heritage buildings, while the Community Fund could fund refurbishment such as new facilities, or re-ordering to enable increased activities/use of buildings.

Development of strategic approaches to long-term partnering in particular areas

We have noted successful programmes of support for those caring for heritage, such as Heritage Digital and Rebuilding Heritage. Those responsible for historic religious were amongst those who accessed these programmes. [Disclosure: these were undertaken by our parent organisation The Heritage Alliance.]

These programmes achieved responsive, expert delivery of heritage support.

But they were short-lived. We think there is room for some partnerships to be strategic and longer-term.

For historic religious buildings, this might include support for congregations.

Investment in reporting

NLHF could usefully invest in the maintenance and publication of better data (e.g. analysing investment by sector and size and purpose of grant).

What organisations, or types of organisation, would you like to see us work in partnership with?

Policy

For policy, work in partnership with national heritage organisations and organisations responsible for historic religious buildings.

Grants

Regarding delivery of grants, work in partnership with the Community Fund, those organisations responsible for historic religious buildings, and other grant givers.

Specific programmes

Regarding specific programmes, work with any appropriate organisation, exploring long-term partnerships where feasible.

Priorities: Environmental sustainability

19. Our current approach to environmental sustainability is that we expect all applicants – regardless of heritage type or project size – to tell us how they will limit any potential damage to the environment and how they will make a positive environmental impact, particularly for nature. We expect funded projects’ environmental sustainability actions to be proportionate to the level of grant, meaning the larger the grant, the more we expect.

Please tell us your views on how we can strengthen our current approach to environmental sustainability. What are the most important things we can do to support projects to reduce their carbon footprint?

Expert advice

It would be reasonable for the Heritage Fund to expect all works to be undertaken in as environmentally sustainably way as is appropriate, taking all factors into account (including embedded energy when considering mitigation).

Expert advice should be taken from those most familiar with the particular challenges faced by historic religious buildings in moving towards environmental sustainability (both carbon footprint and climate resilience), and in deciding what systems of measurement are appropriate.

Proportionality

You say that ‘the larger the grant, the more that is expected’ in environmental terms. This is not reasonable if grants are for major repairs maintaining what is already there, and whose cost is fixed by the circumstances of the case.

What is expected in environmental terms should be in line with the nature and scale of the work itself and the opportunities it directly brings, not the financial size of the grant.

Conditionality

Expert advice both in policy terms and on a case by case basis would be needed if capital grants were to become conditional on carrying out unrelated environmental work.

Not degrading heritage

It is crucial in considering carbon footprint that decisions take into account the restrictions imposed by the historic nature of the building - there is no point in degrading the heritage value of a building for future generations for what would in national terms be a miniscule gain in mitigation.

Affordability

A peculiarity of historic religious buildings is that most are looked after by volunteers, funding them out of their own pocket rather than through admission charges. The affordability of any requirements needs to be taken into account.

Taking existing commitments into account

Decisions should take into account the existing commitments made by congregations to work towards environmental outcomes – that is, there should not be an *automatic* requirement for incremental improvement over and above what is already planned. Any requirements should be assessed on a case by case basis, and be able to demonstrate cost-effective marginal benefit over what is already planned.

FINALLY

Finally . . . we very much value the opportunity to take part in this important consultation. We would be happy to answer any questions raised by our responses.