

from **The Historic Religious Buildings Alliance**
a group within The Heritage Alliance

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

The Heritage Alliance

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Energy Branch
Energy, Environment and Agriculture Team
HM Treasury
1 Horse Guards Road
SW1A 2HQ

Dear Sir or Madam

Shale wealth fund consultation

Thank you for the opportunity to respond to the Consultation on the Shale Wealth Fund. I am responding as Chair of the Historic Religious Buildings Alliance (HRBA), a group within The Heritage Alliance.

The members of the Historic Religious Buildings Alliance 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.

Response to Consultation on proposed Shale Wealth Fund

Our response is to your **Question 11**, on the ring-fencing of the Fund for specific purposes.

'Community Asset'

We note your suggestion in the fourth bullet point of paragraph 3.10 that funding might be available to *make a contribution to the local community, by providing funding for community groups and the development of community assets, such as libraries, or sports facilities.*

Our members are non-government, voluntary and private organisations that promote, conserve, study and involve the public in **our heritage**.

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We are broadly in favour of this suggestion. However we believe the two examples of community assets ('libraries' and 'sports facilities') unnecessarily narrow the notion of a community asset to a building in the ownership of a local authority and dedicated to a particular purpose. We think this is too restrictive in itself, and if taken as normative it would also have the unintended consequence of excluding smaller communities such as villages from the Fund, which often use a quite random mix of buildings for community purposes not requiring dedicated space.

A further complication is that the term 'community asset' is used in other legislation (e.g. the Localism Act 2011 in its approach to Assets of Community Value) in ways that we think are unnecessarily restrictive in the context of the Shale Wealth Fund. For example, the definition in the Localism Act has been taken as omitting religious buildings, even when they are used for wider non-religious community purposes beyond the congregation, a role that is very common and widely recognised.

Some care is therefore needed here. In particular, any definitions should be drawn widely enough specifically to include places of worship when they provide a venue for non-religious community activities. One approach would be for the Fund explicitly to include assets which are owned by charitable organisations and other not-for-profit organisations and are used for any non-religious community purpose, including those cases where the wider community use is not the only use of the building. We think this general approach would then successfully include the wide mix of buildings used in smaller communities such as Scout and Guide huts and school halls, together with Local Authority approved Assets of Community Value if they are owned by an appropriate not-for-profit body.

We would be happy to discuss this point further.

Objects of the Landfill Communities Fund

The Objects of the Landfill Communities Fund (your paragraph 3.11) have stood the test of time, and we believe they should be incorporated in any goals of the Shale Wealth Fund.

The first four Objects relate to the restoration of land, the remediation of pollution, the provision of public amenities, and conservation of natural habitats. The fifth Object (Object E) is the restoration of a building or structure which meets the following conditions:

- The building or structure must be a place of religious worship, or of historic or architectural interest (listed status or equivalent);
- The building or structure must be open to the public; and
- The building or structure must be in the vicinity of a landfill site. [This last condition would need amending to meet the requirements of the Shale Wealth Fund]

Object E has allowed funding for a wide range of buildings, including places of worship of a variety of religious groups, all open to the public. The government has recently recognised the pressures faced by one group of historic religious buildings (those owned by the Church of England) by setting up the ongoing English Churches

and Cathedrals Sustainability Review,¹ and as the Landfill Communities Fund gradually winds down we believe it would be appropriate for Object E to be picked up in its entirety by the Shale Wealth Fund.

Thank you again for the opportunity to comment on the proposed Shale Wealth Fund.

Yours sincerely

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¹https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/509933/ChurchTaskForce.pdf