

ADVISORY BOARD FOR REDUNDANT CHURCHES

Criteria for determining heritage values and the scope for change in closed Anglican churches: report on consultation

Introduction

- 1 The draft document went out to public consultation between 1 January and 31 March 2008, announced on the digital newsletters of Heritage Link and Salon (Society of Antiquaries of London). It was sent to selected national heritage and Church organizations including all Dioceses and placed on the Advisory Board's web-site. In this report, respondents are identified by category rather than individually except for the Department for Culture Media and Sport (DCMS) and the Council for the Care of Churches (CCC); comments made in reply to responses are *italicised*. This report has been circulated to all original consultees and the final document will be published in the Advisory Board's final Annual Report: both will also be placed on the web-site which will be maintained for this purpose until 31 March 2009.

- 2 22 responses were received, from:
 - 6 national heritage bodies (DCMS, English Heritage, Heritage Lottery Fund, Institute of Field Archaeologists Buildings Group, Ecclesiastical Architects and Surveyors' Association, The Association of Local Government Officers (UK))
 - 2 national church bodies (CCC, Churches Conservation Trust)
 - 9 Dioceses (Bristol, unknown, Truro, Bath & Wells, Ely, Salisbury, Worcester, Lichfield, Durham)
 - 2 national amenity societies (Victorian Society, Society for the Protection of Ancient Buildings)
 - 3 individuals (Bishop of London, Quentin Carroll, Matthew Saunders)These responses contained 119 comments or observations. Two responses made no observations and three only single comments. Responses varied in length and detail: three were notably lengthy and five especially brief.

- 3 Those replying included the principal national church and state organisations, two of the key national amenity societies and a fifth of Dioceses. This was a good level of response, but it was disappointing not to hear from the Institute of Historic Building Conservation.

General response

- 4 Of the 22 responses:
 - 12 were positively welcoming with comments or suggestions
 - 6 made comments or suggestions without expressing a view on the exercise overall
 - 2 were critical of the document as a whole or the exercise it represents
 - 2 had no observations to make

Advisory Board for Redundant Churches

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- 4.1 Two Diocesan responses were positive, one finding itself “broadly – sometimes wholeheartedly – in agreement with the points identified (in a) helpful and constructive (paper).” Two Dioceses, together with two national bodies, betrayed misconceptions about the limits to the Advisory Board’s statutory role and functions. *Given the widespread circulation of ABRC Annual Reports it was disappointing to find continuing misconceptions about the role of the Advisory Board, and also that some encountered during the formal processes leading up to abolition.*
- 4.2 There were requests to “humanize” the English, unpack some drafting and to give examples of cases. *The drafting has been reviewed. Examples would unhelpfully extend a strategic document intended for those well able to supply their own, but would be essential in any version prepared for wider circulation.*
- 5 Explicit criteria were welcomed by several respondents.
 - 5.1 One national body said that: “the criteria appear admirably thorough and considered”; another that the “document ... is very thorough and near comprehensive and ... the new criteria are sufficiently clear and complete”.
 - 5.2 One national body felt “a paper detailing express criteria” is “particularly useful” because “so many of the ‘values systems’ processes do not have a natural fit in our view with Places of Worship”. *This is an interesting comment in the light of the recent publication of English Heritage’s Conservation Principles. These are underpinned by a set of heritage values and are intended to foster a consistent EH response to casework including churches, whether exempt or not.*
 - 5.3 The CCC gave qualified approval to the draft criteria and report formats as a useful starting point for the new Statutory Advisory Committee (SAC) replacing the ABRC, subject to discussion by that body and the Church Commissioners and liaison with the new Church Buildings Council (CBC). *This was contained in a longer letter referred to elsewhere in this report. Because it contained some misconceptions about the role and work of the Board, and given that the transition date from ABRC to SAC was only about two months away at the time of receipt, a separate response has already been sent directly to the CCC.*
 - 5.4 One individual “congratulate(d) the ABRC on clearly setting out its procedures and processes. The SAC and CCB will obviously have to find their own path to deal with this casework that may well differ from the processes current used by both extant bodies, but it is good to see processes and reasoning set out in this way.”
 - 5.5 A national amenity society said: “You have a good model here, and we will expect the SAC to match it in quality.”
- 6 There were some more neutral or less supportive comments.

- 6.1 One individual felt the Board’s approach to criteria could not capture the complexities and sensitivities of historic churches; another hoped for an unspecified degree of ‘flexibility’ when applied to casework, a view echoed by a Diocese which wanted to “be a little more relaxed in adaptation to maximise the chance of alternative uses”. *These are interestingly contrasting but related comments. It is no longer possible to assert the complexities and sensitivities of historic churches solely on the self-justifying authority of experts without any visible ‘workings’. A transparent framework can make expertise more credible and mediate debate between experts. It can also help distinguish between two kinds of ‘flexibility’, managing change by serving needs and respecting heritage values, and riding roughshod over heritage values in order to secure a pre-determined use that disproportionately changes or preserves.*
- 6.2 One Diocese wondered “how many Dioceses have the human, relevant professional or financial resources to cope with this sophisticated process.” *This is not so much a problem for Dioceses as for the new central church bodies and the secular bodies – English Heritage, local planning authorities and the national amenity societies – who have to regulate or comment upon cases handled by the new arrangements.*
- 6.3 An individual applauded the initiative “to leave a tangible written legacy summing up 40 years of experience” and found the “efforts ... both public spirited and, given the history of the abolition of the ABRC, gracious” but nonetheless “found the document hugely disappointing” and felt that it could not “be pursued without a radical rethink” ... “it simply does not reflect the subtlety of thinking which the ABRC has been pioneering over its 4 decades.” *The nature of the rethink was not specified, but the rest of this particular response appears to react strongly against the imposition of an analytical system perceived as risking suppression of a building’s individual qualities and encouraging mechanical rather than fully considered judgements. As the text of this report recognizes, these are risks, but responsible conservation in the 21st century, working for a wider public now and in the future, cannot be exempted from the need to show transparency and accountability.*

Analysis of significant heritage values

- 7 Comments were invited on the content and usefulness of the tables after paragraph 12. The first set analysed the historical / architectural / archaeological significance of church / contents / churchyard / setting. There was little comment on the tabulated factors themselves.
- 7.1 DCMS felt that they appeared to “represent all of those considerations appropriate to decisions as to the significance of buildings”. *It is worth noting that the definition of ‘special interest’ in the draft Heritage Protection Bill published in April 2008 has four components – historic, archaeological, architectural and artistic.*

- 7.2 The CCC had a concern that “the rather mechanical approach advocated in the Criteria risks missing the human dimension if it were used on a ‘living’ church and also the almost indefinable spiritual, aesthetic and emotional aspects of a church and its setting.”

This would indeed be a risk for churches still in use, but a closed church cannot be “living” because it has lost its original use. But the criteria were devised to capture significant intangible qualities from past use in such terms as historic and archaeological interest, aesthetic quality of contents, townscape value and the relationship of church and setting.

- 7.3 A national body noted the complexity of the analysis, hoping that “it will be possible to design a single document that pulls (it all) together for the benefit of those non-experts who are to read the report and discern the future of the building”. Another national body wondered “if it is to be made available to a wider audience ... could be presented in a more ‘user-friendly’ fashion?”

For reasons of openness and transparency on matters that are of interest to the public as well as to the Church, the preparation of a version for wider consumption by other interested parties is highly desirable, but is not practicable before the Advisory Board ceases to exist on 10 June 2008.

- 7.4 A national body wanted reference made to the age of a building as a factor in the decision-making process, following paragraph 6.11 of PPG15.

The point is taken, but age is already an explicit factor in a listing decision.

- 7.5 A national body wanted more harmonisation between the paragraphs 10 to 12 and the equivalent tabulated information.

This refers to a drafting omission, to be rectified, that failed to distinguish sufficiently between the linked factors of architectural-aesthetic quality and architectural-historic interest.

- 7.6 Two respondents, a national body and a Diocese, noted the lack of reference to Local Development Framework policies and designations such as historic environment / archaeological alert areas, which would be relevant criteria in arriving at the heritage values of a Church.

The point has been added to the table.

- 7.7 An individual drew attention to the difficulties and dangers of predicting confidently that a given architect or construction technique would not be re-evaluated at a future date and given greater importance than ascribed today.

The point is well made, but there are difficulties in avoiding misuse as a recipe for an unrealistic level of universal precautionary preservation.

- 8 The second table summarized the elements to arrive at a valuation of ‘high’, ‘moderate’ or ‘low’ for a church.

- 8.1 This exercised two Dioceses. One felt that “judgements will inevitably tend to be subjective”; another feared “an inconsistent approach between officers undertaking

the analysis.” Another recognized that, while “the overall assessment is ultimately a matter for the collective judgement of the Advisory Board, this presupposes that members are in an informed position to question the officers’ advice. It is presumably too early to know whether the make-up of the SAC membership will have the objective competence in this respect.”

These are crucial issues. As stated in the consultation, the criteria cannot be used properly without the necessary range and depth of expertise in a combination of officers and Board / Committee members. The new SAC will be smaller than the outgoing Advisory Board and there are early indications of a reduction in the range of expertise amongst its membership for the core task of understanding the heritage values of a building. An intention to fill the gaps with ad hoc consultation of people on other CBC committees misses two important points: the strength of the expert advisory function relies considerably upon its collegiality; the SAC itself has got to be equipped to assess these outsourced consultations.

Correlation with other designations and evaluations

9 Comments were invited on the table at paragraph 17, which correlated the summary ‘high’ / ‘moderate’ / ‘low’ valuation with other designations and evaluations.

9.1 The CCC considered the tabulation of significance against this scale of three grades to be a bold attempt to assign absolute values and ‘points’ to the complex layers of significance inherent in a closed church, its contents, churchyard and environment. It noted a lack of correlation with “the internationally accepted five-point ‘ladder of significance’ which has also been adopted by the Council in its guidance on *Statements of Significance and Need* and *Conservation Management Plans* (June 2007), and in its appraisal of churches in the P(astoral) M(easure) Reports”. Though it saw scope to use this as an initial platform for the SAC’s decision making process, it considered this approach to be “fraught with difficulty, in particular the risk of over-simplification and reducing churches to their parts rather than seeing them as the sum of these”. It felt that “importance and the related word significance are tricky, slippery concepts”, and that “more discussion of the philosophy underpinning the proposed approach may be necessary.”

The five-level table at paragraph 17 deliberately reflects the key parameters for the range of redundancy outcomes arising from the process advised by the ABRC, and the designations of the secular system that regulates consequential changes to closed churches outside the exemption. The five-point “ladder of significance” is not designed to cope with these practicalities; it correlates poorly and potentially confusingly with the secular designations. The risk of devising over-simplified and mechanistic criteria is recognised, but managing change to buildings of recognized national (or local) importance is a matter of public interest, so the process must be transparent and accountable; this is also the best safeguard against administrative or political manipulation seeking to promote damaging schemes or prevent acceptable change. It is emphatically not a “points” system (if it becomes that, it is being misused) because it depends upon sufficient expertise in officers and committee members, applied methodically by accurately analysing and assessing the components of a church before evaluating the whole as the overall sum of the parts.

- 9.2 One Diocese felt the table was “too simplistic a ‘scoring’ system to cover the mix of factors so comprehensively tabulated in paragraph 12”, arguing that “the contrast in criteria depth between the two tables is too severe”.
A comprehensive analytical structure has to be summarized in order to answer the ultimately simple question: ‘do we preserve, alter or demolish?’ But before finally answering that question for any church, the analysis should be reviewed carefully to see whether its totality is actually more or less than the sum of its parts. Explicit criteria and a transparent process should help others follow the reasoning, and guard against ‘cooking’ the summary judgement in favour of a greater or lesser outcome not supported by the analysed significance of the building.
- 9.3 Two comments from national bodies about ‘regional’ value showed the need to distinguish more clearly between, on the one hand, its use as a descriptive term indicating the distribution of characteristics such as stone-type or the products of an architectural practice, and, on the other, as a level of significance, which should be avoided as confusing given its absence from national designation criteria.
The draft will be amended accordingly.
- 9.4 An individual pointed out that, “ ‘statutory value’ may be national in provenance but it is for the most part local in resulting statutory action”. A national body pointed out that the statutory gradings for historic interest in PPG15 are I = exceptional, II* = great, and II = special, and that Local Lists are not a statutory requirement.
The nomenclature in the table will be reviewed. In the draft Heritage Protection Bill the expression ‘national importance’ has been replaced in by ‘special interest’, but, subject to clarification in future guidance, this is taken to be ‘national’ in scope because the legislation is national.
- 9.5 The correlations caused concern for two Dioceses and two national bodies, one of the former pointing out that “listing (or not listing) is not an entirely reliable guide to importance. Mistakes and omissions can be made”; another argued for a review of the listing as part of the use-finding process.
Cases of listable unlisted churches and under-graded listed churches are familiar, due to the uneven state of review nationally, with some urban lists over 35 years old. Whether the SAC brings such cases to the attention of English Heritage, with potential implications for subsequent use-finding, will be an important test of independence and impartiality in the new arrangements.
- 9.6 Several criticised the correlations that led to vesting in the CCT, one commenting “especially given that the CCT’s funds are limited and that their value is diminishing in real terms”.
Sight should not be lost of how strict correlations are modified in the document, notably in paragraph 20. The Advisory Board / SAC is expected to give advice on heritage values free of financial and pastoral considerations. Recommendations for preservation must continue to be based on the merits of the building, whether or not the new body uses the criteria outlined in this document. How preservation (defined by English Heritage’s Conservation Principles as ‘the avoidance of harm’ to heritage values) is achieved is a matter for others, whether through the CCT or other equally

effective arrangements. Financial considerations should never modify assessments of heritage values.

- 9.7 A related Diocesan view was that “the pressure to favour schemes altering closing or closed churches is no bad thing. It will motivate innovative thinking in enabling new uses while minimizing significant alterations. Vesting in the CCT has long been the “easy option” for all those advising the Church Commissioners [not least DRCUCs] and for the Council for the Care of Churches”.

There is indeed scope for innovative thinking, but it is a task for others if a conflict of interest is to be avoided. The role of the ABRC / SAC is to inform the choice of future for the church by identifying its heritage values, and then to assess and advise about the consequent impact of proposals for change upon those values.

- 9.8 DCMS considered the need for “acknowledgment that a ‘high’ ABRC values will not necessarily always lead to vesting or equivalent arrangement, or preservation as a monument” and “to highlight the Church Commissioners’ duty to ensure that CCT is able to afford the necessary repairs to any building where a decision to vest is being considered”. DCMS did however accept “that the role of the Board has been to consider and advise on the heritage values of buildings, and the purpose of this paper is to consider ways of assessing heritage values, relatively free of the need to consider the financial and pastoral implications of decisions and advice”.

This response is self-explanatory.

- 9.9 DCMS also felt it might be useful to outline what arrangements take place at which stage in relation to finding alternative uses for redundant buildings, setting out the duties of Dioceses in relation to disposal, the point at which the central Redundant Churches team becomes involved, and the theoretical relationships between the bodies concerned.

This a matter for the Commissioners, who drive the process and have to make decisions on the basis of advice on pastoral, financial, and heritage considerations; it is not for the ABRC / SAC. It does however raise the issue of identifying the stage at which the information provided by the Advisory Board on the opportunities and constraints affecting alternative uses should be made available.

- 9.10 One national body was concerned that paragraphs 16-18 gave too strong a link between the Advisory Board’s heritage valuation and the likely usage outcome, arguing that it could not be determinative because other factors have to be taken into account.

This is fair comment. What matters is that heritage values are fully identified and agreed at the outset so that the impacts on them from proposals for future uses can be fully assessed from all viewpoints.

- 9.11 A national body commented that the terminology used in relation to 'statutory meaning' (table on p10, column 4), is different from the generally accepted definitions used within PPG15. The table on p10 also seems to indicate that local lists / registers are a statutory designation, whereas they are not and are likely to remain so under the Heritage Protection Act.

The table has been amended, but it will be important to take into account any terminological change in the new Act.

Circumstantial factors affecting alternative uses

10 Comments were invited on the content and completeness of the circumstantial factors identified at paragraph 20 as affecting the scope for reuse of a closed church.

10.1 A national body suggested separating out the factors referring to possible options for alterations to a Church from those that refer to circumstances which may influence possible future use; a Diocese suggested one set informs the other.

Of course they are different types of factor, but it has to be recognized how they affect each other in determining the future of a closed church. The first five bullet points cover 'scope' which is less specific than options; the second set covers 'circumstances': though different they must be reviewed together. If scope for re-use exists but circumstances prevent, then the cost of overcoming the circumstances (if practicable) must be weighed against the benefits of using the opportunity. If circumstances exist but scope for re-use does not, then the cost of damage to heritage values must be weighed against the opportunity to avoid vesting or to devest.

10.2 Others suggested adding various factors, such as proximity / access to regular public transport services and tourist access routes, statutory plans and development opportunities / threats, on site access to the building (for example across a continuing burial ground), presence of a Flood Plain or other inherent obstacle in local planning policy, the extent of dilapidation i.e. the economic case for restoration for any on-going use at all, residential development, commercial development, external modifications such as additional doors, windows or roof lights etc.

Some of these useful suggestions can be included under existing broad headings; the main circumstantial omitted heading to be added to the document is the local authority Local Development Framework with its various plan documents..

11 Two Dioceses remarked that, while the state of repair of a building should not be influential in determining its importance, the extent of dilapidation in reality will be an important circumstantial factor pointing towards a particular outcome.

This is fair comment. Condition should not affect heritage values, but can influence conservation outcomes. This point could be covered in the Informed Change Assessment.

12 Some Dioceses who did not appreciate that the Board's role excludes consideration of financial aspects argued strongly for their inclusion as part of the advisory package.

They were critical of "the conservation lobby (which has) a lot to say but no cash to back up their preferences", and made a wider point, that "if the nation wants us to preserve this aspect of our heritage, government must provide more finance".

These are matters for others.

Comments on appended CIS and OIA documents

- 13 Appended examples of the Critical Information Summary and Options & Impacts Assessment (now Informed Change Assessment) attracted a range of comments.
- 13.1 Two Dioceses were particularly positive. “We agree that (their) more tabular nature ... makes them more readily understandable than the narrative style of the current Pastoral Measure report.” “(They) are first class tools for use when negotiating with local authorities and sources of grant aid in determining new uses. As you have indicated, they have evolved from many years of experience and it is important that these tools are fully adopted by the SAC.”
- 13.2 An individual made detailed comments on the strengths and weaknesses of all three documents (CIS, ICA, PMR), arguing that that “both extant bodies produce reports suitable for their purpose, and I do not see how one is better or more suitable than the other - I see them as complementary.” Regarding process, “there appears to be an ‘all or nothing’ approach to this issue, which is both inaccurate and misleading. The process of redundancy is a long and tortuous one, and each stage has differing requirements. The PM reports, once produced, can sometimes serve to make PCCs aware of the quality of their building and thus stave off redundancy. This is the start of the process, and it is unrealistic to expect that a document produced for this stage should also meet the needs of providing advice to the Commissioners at the end of the process.” For the future, “the new SAC and CCB need to establish stages in the process of redundancy, starting with the initial assessment and moving from there. Each stage would have a defined output and require the gathering of certain information. The objective of the whole process should be a portfolio of all the relevant information on a building or site, starting with the PM report, and then gathering all the local context, policies and background, finally resulting in a recommendation. To attempt to provide all the relevant information simultaneously is, in my view, undesirable and unsustainable, and the process can be put on hold at any time.”
- This is a helpful set of comments. Arrangements that replace the Advisory Board must take a clear and unencumbered view of information requirements in dealing with closing and closed churches, based upon the principles of ‘Informed Conservation’ and procedures that are cost-effective and meet defined needs. To date, this has been frustrated by overriding organizational tensions in the long-drawn-out and unsatisfactory process by which the abolition of the independent Advisory Board was secured. The CCC’s PM reports have evolved in recent years and the ABRC’s CIS / ICA documents have likewise emerged and developed in response to these tensions and to the changing horizons in conservation management. With the organizational tensions ‘resolved’, it ought to be possible to identify what information is needed at what stage for what purpose, and devise cost-effective ways of acquiring and verifying it.*
- 13.3 A national body urged that “copies of the Critical Information Summary and the Options and Impacts Appraisal are lodged with the local Historic Environment

Record and would like to see a commitment by the new statutory body (either within the document or elsewhere) to this effect”.

This is a good point to be added.

- 13.4 A national body sought “... some further clarification of the methodology to show the interrelation of the various reports.”

Though this was spelt out in the draft, it will be reviewed.

- 13.5 An individual criticised the lack of detail in the CIS, regarding it as a kind of ‘Pevsner-plus’ approach, and was “really shocked by the assessment (OIA / ICA) of Gravenhurst”.

The CIS summarises relevant points drawing upon wider documentation and research; the OIA / ICA is a framework for considering potential uses rather than a starting point for proposing greater change or a detailed specification of works.

- 13.6 The CCC observed that this new tool (the CIS) was quite familiar and recognized its adoption from a template originally developed for Statements of Significance in the Church Heritage Record report of 2000. During development of its own advice on these Statements, the Council had found it unsuitable for that purpose, and had adopted a more flexible and accessible model which sought to involve the parish in its production (*Guidance on Statements of Significance and Need 2002, revised 2007*). This has been tested and endorsed by English Heritage and other bodies.

Statements of Significance are not the same as the CIS and OIA / ICA documents which have been developed in consultation with the Commissioners and principal partners in the secular planning and heritage field, specifically to meet requirements for closing and closed churches. The 2000 template merely aimed “to begin a discussion about content and format”. There has been subsequent divergence, on the one hand, into parish-friendly Statements of Significance, and on the other into the CIS as a technical document informing what happens after parochial use has ceased, dealing with heritage values and factors affecting the insertion of alternative uses. Customer feedback indicates that the CIS is more usable and useful for that purpose than the traditional Pastoral Measure Report, designed for a different purpose.

- 13.7 The CCC observed that the OIA / ICA is also familiar, and similar to its approach to Faculty Jurisdiction casework. It felt it was a suitable document – subject to review – for “the micro-planning approach required at the later stages of the process, requiring a high level of professional input which it is only possible to bring to the limited number of cases”.

The Advisory Board is working to minimize resource demands by tailoring long and short versions to suit the quality of church and the complexity of its situation. To regard it as part of the “later stages of the process” is to fail to understand its basic purpose in setting a comprehensive framework at the outset of closure, within which any type of proposal can later be considered. It is different in purpose, content and timing from options studies under Faculty Jurisdiction, which DAC experience suggests are more usually about unpicking ill-considered proposals and persuading people to consider alternatives. The OIA / ICA also serves the need to engage fully

with the secular planning from the outset of the formal process, made more pressing by a new shorter two-year period for resolving cases.

- 13.8 A Diocese felt “it would be beneficial if the OIA could give more in the way of positive guidance and advice (perhaps even giving examples) as to what is likely to be acceptable in terms of change.”

This is at least partly to mistake the function of the OIA /ICA, which has to tread a careful path between being under- and over- prescriptive. It sets out a framework based upon potential impacts on heritage value, but must not be more specific in suggesting uses, as shown by the standard disclaimer at the head of each document.

- 13.9 An individual was concerned about the extent of change the OIA / ICA appeared to license. “Surely the ABRC (and CBC) should be stating quite unequivocally in these earliest ... days for a potentially redundant church that the best use is one that is both well funded but loose-fit. One that lives with the church largely as it is - use by another congregation, Orthodox, Catholic or whatever, open plan small scale offices leaving the East End intact, or one that exploits its purpose built function as an auditorium. ... Surely also in a building not yet redundant and only being considered for it you should be expounding the option of mixed use or part redundancy - whether that be doubling as a meeting hall for the village, hosted post office or whatever.”

Some of these comments refer to stages before the advice of the ABRC / SAC is sought. Nonetheless, the sentiments behind these comments are appreciated, and suggest the need to clarify that the whole purpose of the OIA / ICA is to provide a framework within which options for change can be managed, rather state a maximum degree of change that a developer then so often seeks to exceed.

- 13.10 The same individual asked: “Why not spell out the hierarchy of uses - with multiple residential the absolute last resort for any building of interest. But there again illustrating how in some cases the ABRC has approved the "new western gallery" approach, accommodating ancillary or new uses. This can fit very well in a traditional Anglican plan form. And why not more about uses that are sometimes 100% reversible ? i.e. steel not concrete floors independently supported from main walls.”

The Advisory Board is not concerned with uses but with the impacts of change; it considers the technicalities of alteration and use-insertion only in response to proposals made by others. Formally defining a hierarchy of uses risks correlating use-type with impact-type, and also makes assumptions about the acceptability of given uses which are properly the province of the Local Planning Authority. Similarly it lets developers off the hook of having to prepare Design and Access statements which, if done properly, are the key to getting the best option for the insertion of any particular use. It is also important to be realistic about ‘reversibility’ which is so often claimed in support of proposals that do great visual harm and on economic grounds alone would never be reversed.

Other specific comments

- 14 There were several other substantive comments on particular paragraphs.
- 14.1 The Churches Conservation Trust is funded 55% by the state: 24% church and 20% charitable sources. Its statutory grant has been at a standstill since 2001 although a small increase comes into effect on 1 April 2008.
This will be amended
- 14.2 A national body commented that “part of the Introduction put forward the strong impression that the views of the Churches Conservation Trust and the Church Commissioners on the vesting of churches are overwhelmingly financially driven and that the only reason for wanting to reduce the flow of churches is because of financial stress. This is a very partial view. In fact, efforts by the CCT to support preventive approaches to redundancy and vesting have been as much driven by the belief that parish churches are essentially community buildings and are far better off, wherever possible, remaining in the control of the local community and the use for which they were originally built.”
This comment exaggerates. The views of the CCT and the Commissioners may not be ‘overwhelmingly financially driven’ but they are heavily financially circumscribed, otherwise there would not currently be over 30 churches recommended for vesting (directly or in the last resort) and awaiting final decisions. The new legislation will increase these tensions by reducing the ‘waiting period’ to two from three years. The success of ‘preventative approaches to redundancy and vesting’ must be judged not just by numbers but also by the acceptability of the impacts of consequent changes upon the heritage values of the buildings themselves.
- 14.3 An individual “endorse(d) the intellectual discipline behind your approach, (yet it) is so often overturned by the imperative need to find a solution before the kids succeed in burning the church down. ... So often in casework we should be following the preordained textbook path but find ourselves clutching at straws as that is the only way to save anything. To recommend the virtuous path only in many an inner city is to risk being ignored - and defeated by the loss of the building in question to the lead thief, the vandal and the arsonist. Why not expound here on the possibilities for mothballing rather than taking panic-driven solutions ?”
Comment noted, but again this is for those whom the ABRC / SAC advise.