

# **ADVISORY BOARD FOR REDUNDANT CHURCHES**

## **Criteria for determining heritage values and the scope for change in closed Anglican churches**

### **Foreword**

From 1968 to 2008, the Advisory Board's assessments informed decisions by the Church Commissioners on the future of English churches no longer required for worship. In June 2008 this task is transferred to a Statutory Advisory Committee (SAC) of a new Church Buildings Council (CBC). The options are the same – alternative use with the alterations needed to implement it, preservation for the benefit of the Church and the nation by vesting in the Churches Conservation Trust (CCT), and demolition. The decision-makers will still require expert and authoritative advice on all aspects of historic parish churches.

During its lifetime, the Board's advisory criteria have changed in response to evolving conservation practice, but they have never been made public. This is no longer acceptable in a climate of transparency about matters that concern the public interest. That interest is underlined by the statutory listing of historic buildings, the established position of the Church, and the exemption of churches in use from certain planning controls. The Church receives repair grants from public funds and seeks to engage the wider community in the care of its historic buildings. It has potential financial returns from the disposal of redundant churches and sites, and has to obtain secular planning consents for alternative uses in closed churches no longer benefiting from the ecclesiastical exemption.

This technical document provides a framework for formulating expert advice on the future of closed churches. Originally focused on vesting in the CCT, it now covers all three options. It responds to growing appreciation of heritage values, most recently defined in English Heritage's *Conservation Principles: Policies and Guidance* (April 2008) as evidential, historical, aesthetic, and communal. These are seen as "different ... in nature and effect ... (from) utility and market values and instrumental benefits", neatly reflecting the long-standing exclusion of pastoral and financial considerations from the Board's advisory remit.

Heritage values are the starting point for determining the future use and scope for change in a closing historic church. They inform the Advisory Board's two working documents, the Critical Information Summary (CIS) and the Informed Change Assessment (ICA). The ICA draws upon the CIS to outline systematically the effects of change without reference to any type of use or specific proposal, thus helping form views about the limits of what may be acceptable.

These documents were the subject of public consultation from January to March 2008, and have been amended in the light of responses received. The Advisory Board commends them to the Church Commissioners, the Advisory Board's successor Statutory Advisory Committee, and all who have an interest in the quality and outcomes of their deliberations.

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Chairman  
May 2008

## Background

- 1 The future of closing Anglican churches has to be determined with due regard for their heritage values. A significant proportion is of such quality that:
  - (a) few alterations are possible without serious damage to heritage values
  - (b) impacts on heritage values from available alternative uses are so seriously adverse as not to be in the public interest
  - (c) demolition is precluded, but local circumstances inhibit suitable alternative uses that could be inserted without seriously adverse impacts on heritage values.
- 2 Since 1969, the Churches Conservation Trust has accumulated an estate of over 330 closed churches. It is currently funded 55% by the state, 24% by the Church and 20% from charitable sources. Its core budget, frozen since 2001, has steadily decreased in real terms apart from a small recent increase. A backlog of over 30 churches recommended for ‘direct’ or ‘last resort’ vesting, but not yet with the CCT or any other suitable guardian, awaits decisions by the Church Commissioners. The future flow of closures is uncertain: it might be reduced by greater flexibility in the continuing use of open churches enabled by new provisions for ‘extended’ use, or increased by more rationalisations arising from systematic diocesan reviews.
- 3 The new Statutory Advisory Committee has an ‘independent strand’ of members appointed by the Department for Culture Media and Sport, but is part of the main Churches Buildings Council which is statutorily required to have due regard for the mission of the Church. It will advise in a climate that seeks greater involvement of local communities with their church buildings, not only as a social good in itself, but also to avoid closure or achieve devesting. There are growing pressures to find alternative uses that can avert additions to an under-funded CCT and reduce calls upon limited Church resources which might otherwise have been spent upon the primary function of mission. These factors tend to favour schemes that alter closing and closed churches.
- 4 This is the background to the need for **criteria** (historic, architectural, etc.) used in conjunction with **standards** of heritage value (high, moderate etc) in order to arrive at appropriate **advice** (vesting, alternative use etc). Their credibility will depend upon the quality of processes for information gathering, assessing heritage values, and determining advice. These need to be, and to be seen to be, expert, systematic, consistent, explicit and accountable.
- 5 At the outset of formal closure, the need for a fully expert appraisal of heritage values is paramount as the bedrock of what is widely understood as ‘informed conservation’, even if at later stages other factors also have to be considered by other agents. A criteria-based approach can take account of individual qualities and circumstances flexibly without setting precedents that incrementally undermine standards. It also provides a reference set of heritage values against which proposals for change can be justified or assessed. It avoids numerical points systems, usually poor at weighing together different elements, prone to over-simplification, and vulnerable to misunderstanding or misuse when taken out of context.

- 6 Criteria can support a consistent standard of recommendations. They can guard against the cherry-picking of exemplars for vesting or equivalent care (selecting one but not another church of equal qualities) or working within a quota for preservation (arbitrarily culling past selections in order to make room for new ones). They also help manage readily identified classes, such as documented post-medieval churches and documented major post-medieval re-workings of medieval churches, by requiring an expert view of their place within the work of known architects. When the question is asked, ‘do we really need another 15<sup>th</sup> century / Teulon church?’, they are able to justify the answer ‘yes, if it is good enough’.

### Information requirements

- 7 Conservation is the sensitive management of change to historic assets, which can occur at an unprecedented level in a closing or closed church. Sensitivity depends upon a sufficient level of understanding before proposals are devised or evaluated. Visions of re-use that ignore or seek to circumvent this first stage, and try to fit a skewed or deficient account of significance around what has already been decided, risk raising unfounded hopes, and, when the scheme fails, disaffecting supporters and wasting resources.
- 8 Obtaining an authoritative understanding often requires site visits by expert Board members, bringing reviewed documentation to bear upon the church itself. Accountability requires a visit to inspect any church being considered for the expensive solution of direct vesting in the CCT or the irreversible one of demolition (though in some of the latter cases the lack of merit may be obvious). Visits should be made in response to proposals for alterations in cases where difficult assessments have to be made about how far change can go without damaging what that change is intended to preserve. Accountability to the public interest also requires that proposals to alter or dispose of buildings vested in the CCT are given direct and close independent scrutiny.
- 9 The Advisory Board’s two baseline documents, the **Critical Information Summary (CIS)** and the **Informed Change Assessment (ICA)** (originally the Options and Impacts Appraisal - **OIA**) draw upon expert research and site investigation. They provide a systematically compiled source of information and an objective analysis of a church, its contents and churchyard, placed in the local and national context. The **CIS** summarises significance and management issues; the **ICA** relates them to potential impacts from generic types of change and to the scope for mitigation before heritage values are adversely affected. Practical casework experience has helped develop and establish the usefulness of these analytical tools.
- 10 There is a need to clarify the relationship between the **CIS** and the **ICA** and the traditional more narrative ‘Pastoral Measure Report’ currently prepared by the Council for the Care of Churches. A study free of organisational considerations should determine who needs what information to what standard and level of detail at which stage of the process, from the first intimation of closure through to the implementation of the alternative use.
- 11 This is a reminder that several sets of information are collected or compiled during the stages of church closure. It should be a formal requirement that these are routinely

deposited in accessible diocesan record systems and local Historic Environment Records.

- 12 The **CIS** and **ICA** also cover the circumstances of the church, which can affect the scope for alternative uses. These circumstances need to be identified at the same time as, and in relation to, heritage values (though finding the new uses is the responsibility of others). Identifying them requires expertise in conservation planning.

### Criteria for assessing heritage values

- 13 The criteria are based on the general terms of reference as set out in s. 56 (1) of the Dioceses, Pastoral and Mission Measure 2007, to give information and advice to the Commissioners about:
  - (a) the historic and archaeological interest and architectural quality of the church or part of a church ...
  - (b) the historic and archaeological interest and aesthetic qualities of the contents of such a church or part;
  - (c) the value of such a church or part to its setting and the surrounding landscape: and
  - (d) the overall importance of such a church or part.

In s. 55(5) ‘church’ was construed as including references to “any curtilage of such a church or place of worship and any churchyard or burial ground or part thereof annexed thereto (and) any contents of such a church or place of worship or any other articles appertaining thereto”. These definitions relate to all historic periods.

- 14 Some comment is needed on the current application of terms largely drafted 25 years ago, and especially on their interconnections.
  - (a) As well as age, **historic interest** includes associations with known events and individuals (including architects - an architectural matter), and the historic role of the building in its settlement context (also an archaeological matter).
  - (b) **Archaeological interest** indicates the intrinsic interest of a specific building, structure, or site in terms of information about dating, plan form, construction, materials, cultural activities, architectural or industrial practices or technologies, burial practices and memorialisation; it also covers archaeological evidence based on observation, excavation, and chance or recorded finds.
  - (c) **Setting** is defined in one sense only, of its value to the church, reflecting thinking at the time these definitions were first drawn up. Today, it would include the other sense, of the church’s value to its setting, whether townscape or landscape.
  - (d) **Architectural quality** covers: proportion, volume, massing, spatial relationships of elements; architectural verve and enrichment; use and aesthetic value of surfaces, materials, contents (glass, organ, fixtures and fittings); overall balance

between design and execution of whole / by period / sensitivity of later additions to earlier work / accomplishment. This combines architectural quality as construction and planning, the aesthetic qualities of appearance, and spatial qualities – internally and as external setting. It is distinct from authorship, style and period which might be termed architectural-historical interest.

- 15 For the purposes of applying criteria, key factors drawn from the **Critical Information Summary** can be tabulated as below in columns for ‘church – contents – churchyard – landscape / townscape context – overall’, and rows for ‘designations and material planning considerations – historic – archaeological – architectural’.

Advisory Board for Redundant Churches

Criteria for determining heritage values and the scope for change in closed Anglican churches

<i>elements &gt; aspects</i> √	<b>church</b>	<b>Contents</b>	<b>Churchyard</b>	<b>landscape / townscape context</b>	<b>overall high – moderate - low</b>
<b>Statutory and non-statutory designations and material planning considerations</b>	<ul style="list-style-type: none"> <li>- building statutorily listed</li> <li>- building locally listed or an important unlisted building in a Conservation Area;</li> <li>- building part of / over a Scheduled Ancient Monument</li> <li>- building part of / over an important archaeological site in local SMR / HER, etc</li> <li>- within ambit of Local Development Framework (LDF) policy on the historic environment</li> </ul>	<ul style="list-style-type: none"> <li>- fixtures and fittings identified in list description or listed by virtue of attachment to a listed building <i>[unfixed items of artistic merit may well be significant but are not included here because faculty jurisdiction would not apply after redundancy]</i></li> <li>- within ambit of Local Development Framework (LDF) policy on the historic environment</li> </ul>	<ul style="list-style-type: none"> <li>- individually listed or scheduled monuments or separate structures;</li> <li>- setting of a listed building or a scheduled / ancient monument;</li> <li>- part of a Conservation Area;</li> <li>- part of / over Scheduled Ancient Monument or important archaeological site in local SMR / HER, etc</li> <li>- nature conservation designations : SSSI, SINC, TPO etc</li> <li>- within ambit of Local Development Framework (LDF) policy on the historic environment</li> </ul>	<ul style="list-style-type: none"> <li>- part of Conservation Area;</li> <li>- Located in Area of Outstanding Natural Beauty, World Heritage Site;</li> <li>- related to Registered Park / Garden or Registered Battlefield</li> <li>- Nature conservation designations : SSSI, SINC, TPO etc</li> <li>- other relevant non-heritage designations, rural or urban</li> <li>- within ambit of Local Development Framework (LDF) policy on the historic environment</li> </ul>	<p><b>high</b></p> <ul style="list-style-type: none"> <li>- multiple or grouped values recognised by designations, e.g. listed and scheduled</li> <li>- Listed grade I ('high), II* ('moderate to high')</li> </ul> <p><b>moderate</b></p> <ul style="list-style-type: none"> <li>- Listed grade II; no other designations</li> </ul> <p><b>low</b></p> <ul style="list-style-type: none"> <li>- Local List 'low to moderate'</li> <li>- undesignated</li> </ul>
<b>historic</b>	<ul style="list-style-type: none"> <li>- documented evidence of early origins or associations or monastic origins / episode</li> <li>- direct association with notable historic personage / organisation or community / event</li> <li>- interest of building as example of type or period of church</li> </ul>	<ul style="list-style-type: none"> <li>- personal or genealogical interest of monuments, memorials or furnishings</li> <li>- interest of contents as example of type or period of church furnishing</li> <li>- historical associations of specific memorials, bells, organs, etc</li> </ul>	<ul style="list-style-type: none"> <li>- churchyard war memorial</li> <li>- interest of monuments and memorials for genealogy or individuals or as example of type or period</li> </ul>	<ul style="list-style-type: none"> <li>- direct association with notable historic event or industrial / urban development</li> </ul>	<p><b>high</b></p> <ul style="list-style-type: none"> <li>- significance for national or wider than local history</li> </ul> <p><b>moderate</b></p> <ul style="list-style-type: none"> <li>- significance for local history including the development of its settlement</li> </ul> <p><b>low</b></p> <ul style="list-style-type: none"> <li>- little significance other than as a memorial to those who used the church</li> </ul>

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<b>archaeo-logical</b>	<p><b>associative interest</b></p> <ul style="list-style-type: none"> <li>- early origins or associations or monastic origins / episode</li> <li>- direct association with notable site (e.g castle)</li> <li>- presumption of archaeological interest from historical evidence (e.g. Domesday Book record of a church or priest, documented evidence of ancient, secular or ecclesiastical settlement, sites or monuments)</li> </ul> <p><b>intrinsic archaeological interest</b></p> <ul style="list-style-type: none"> <li>- building as a multi-period structure</li> <li>- Human remains: evidence of burials within church</li> </ul> <p><b>presumption of archaeological interest</b></p> <ul style="list-style-type: none"> <li>- arising from material evidence (e.g. SMR records, artefacts or furnishings from church)</li> <li>- from evidence for earlier church on same site</li> </ul>	<p><b>presumption of archaeological interest</b></p> <ul style="list-style-type: none"> <li>- arising from material evidence (e.g. SMR records, artefacts or furnishings from church)</li> <li>- evidence of industrial archaeological interest (e.g. historic use of cast iron, association with railways or canals)</li> </ul>	<ul style="list-style-type: none"> <li>- part of / over Scheduled Ancient Monument, ditto important archaeological site in local SMR / HER, etc</li> </ul> <p><b>presumption of archaeological interest</b></p> <ul style="list-style-type: none"> <li>- arising from material evidence (e.g. SMR records, churchyard, or burial ground)</li> <li>- evidence for development of churchyard</li> <li>- human remains</li> <li>- from evidence for earlier church within existing churchyard</li> </ul>	<ul style="list-style-type: none"> <li>- relationship of church and churchyard to existing rural settlement pattern or urban development</li> </ul>	<p><b>high</b></p> <ul style="list-style-type: none"> <li>- long multi-period sequence of development and continuity of use, possibly including previous churches or occupation on site</li> <li>- clear single-period construction that is a good example of its time for design and techniques</li> </ul> <p><b>moderate</b></p> <ul style="list-style-type: none"> <li>- development sequence that is short or with significant gaps in continuity of use unlikely to be filled by research</li> </ul> <p><b>low</b></p> <ul style="list-style-type: none"> <li>- lacking development sequence or particular interest as single-period construction</li> </ul>

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<b>architectural</b>	<p><b>architectural history</b></p> <ul style="list-style-type: none"> <li>- direct association with architectural movement</li> <li>- distinctive or representative example of one or more period(s) of architecture</li> <li>- distinctive example of the work of named architect (including restoration)</li> <li>- architectural contribution of past repairs</li> </ul> <p><b>spatial qualities</b></p> <ul style="list-style-type: none"> <li>- spatial qualities of the church building as a building, the articulation of plan and the rhythm of compartments</li> <li>- internal vistas, views through and visual surprises, quality of surfaces, atmosphere, effects of natural lighting, textures, colours, materials etc</li> </ul>	<p><b>architectural history</b></p> <ul style="list-style-type: none"> <li>- direct association with architectural movement</li> <li>- distinctive or representative example of one or more period(s) of architecture</li> <li>- distinctive example of the work of named craftsman</li> </ul> <p><b>artefactual interest</b></p> <ul style="list-style-type: none"> <li>- distinctive or representative collection of church furnishings, monuments &amp; memorials i.e. importance of ‘ensemble’</li> <li>- distinctive example(s) of one or more categories of furnishing</li> <li>- distinctive or representative examples of the work of named architect, craftsman, or craft guild or group</li> </ul>	<p><b>architectural history</b></p> <ul style="list-style-type: none"> <li>- planned or architect-designed churchyard</li> <li>- architect- or craftsman-designed monuments</li> <li>- memorials &amp; chapels, Commonwealth war-graves</li> <li>- distinctive or representative collection of monuments &amp; memorials i.e. importance of ‘ensemble’</li> <li>- Boundary walls &amp; lychgate (N.B. war memorial gates)</li> </ul> <p><b>ecological quality</b></p> <ul style="list-style-type: none"> <li>- Protected species as listed by Countryside Officer</li> <li>- Trees subject to Preservation Orders</li> </ul> <p><b>spatial qualities</b></p> <ul style="list-style-type: none"> <li>- general character and setting of churchyard and curtilage</li> <li>- the size of the churchyard and the placing of the church within it</li> <li>- groups and rows of tombstones and monuments in relation to each other, the church and well-defined boundaries to the churchyard</li> </ul>	<p><b>groupings</b></p> <ul style="list-style-type: none"> <li>- quality and contribution made by church and churchyard to notable group of buildings</li> <li>- the visual relationship of church, churchyard and their setting, views in and views out</li> </ul> <p><b>views</b></p> <ul style="list-style-type: none"> <li>- distant glimpses in landscape and rural settlement context</li> <li>- visual contribution of church and churchyard to street scene and formal urban planning</li> </ul>	<p><b>high</b></p> <ul style="list-style-type: none"> <li>- outstanding quality of church, contents, churchyard and context as an ensemble, with coherently consistent or contrasting elements</li> <li>- outstanding quality of some but not all the elements</li> </ul> <p><b>moderate</b></p> <ul style="list-style-type: none"> <li>- some quality in more than one element as judged by comparison with similar examples</li> </ul> <p><b>low</b></p> <ul style="list-style-type: none"> <li>- little or no distinctive merit in any element</li> <li>- little likelihood of future re-evaluation as ‘new’ heritage on architectural grounds of concept, planning, functionality etc</li> </ul>

16 Broad judgements of ‘high / moderate / low’ quality can be assigned in each cell of the table below, drawing upon the indicators listed above,. Overall judgements on elements and aspects can be summarised, and a headline view taken in the bottom right-hand cell.

<i>Elements &gt; Aspects √</i>	<b>Church</b>	<b>Contents</b>	<b>Churchyard</b>	<b>Landscape / townscape context</b>	<b>Overall high – moderate - low</b>
<b>Statutory and non-statutory designations and material planning considerations</b>					
<b>Historic interest</b>					
<b>Archaeological interest / sensitivity</b>					
<b>Architectural / aesthetic quality</b>					
<b>Overall high – moderate - low</b>					

17 In practice, most assessments will produce a mix of ‘high’, ‘moderate’ and ‘low’ elements, some expressed as ‘high – moderate’, and ‘moderate – low’. The overall assessment is a matter for the collective judgement of the full range of specialisms in the Advisory Board. Generally,

- (a) the more ‘high’s, the more likely the scope for future alternative uses will be constrained by the qualities of the building
- (b) the more ‘moderate’s, the more likely alternative uses can be inserted without affecting (or affecting in a way that is acceptable) the qualities that exist
- (c) the more ‘low’s, the more likely alternative uses or even demolition will be relatively unconstrained.

Condition is not taken into account (though it can be noted) providing repair seems physically possible; its financial implications are for others to consider when making the final decision about the future of a church, taking all matters into account.

### **Heritage values and advised outcomes**

18 The Church Commissioners require advice in accord with s. 56 (1) of the Dioceses, Pastoral and Mission Measure 2007 about “the potential impact of any architectural or structural changes or other physical alterations”. That advice may point towards a specific outcome but what is finally determined may also be influenced by other factors. The range of these outcomes deserves restating:

- (a) Preservation as a monument of outstanding heritage values, through vesting or some alternative form of guardianship, without scope for alternative use but perhaps some scope for improving visitor facilities,.
  - (b) Preservation as a monument of high or moderate heritage values capable of sustaining, but lacking, a suitable alternative use (= last resort vesting).
  - (c) Alternative uses that preserve moderate and high elements of heritage value.
  - (d) Alternative use with demolition as a last resort
  - (e) Demolition
- 19 The High – Moderate – Low valuations broadly correlate with likely outcomes and statutory designations. The statutory Grades currently incorporate the terms ‘national’ and ‘local’; in the new Heritage Protection Bill the term ‘special’ applies to all designations. The term ‘regional’ confuses as a term of overall valuation, and should be restricted to geographical labels for particular materials or the distribution of an architect’s work. Grades I, II\* and II correlate with the top three of the Board’s five-band scale of value from high to low. ‘Local’ equates with the bottom two bands, Local List and unlisted buildings. It must be remembered that the existing lists are of varying currency, and some original surveys are up to thirty years old; it is an important part of the Advisory Board’s expertise to be able to recognise listable unlisted buildings and under-graded listed buildings.

<b>ABRC value</b>	<b>Likely outcome</b>	<b>Statutory Grade</b>	<b>Statutory meaning PPG15 para 6.38</b>
High	Vesting or equivalent arrangement 18 (a)	Grade I	Exceptional interest
High to Moderate	Vesting in last resort or equivalent if no suitable alternative use 18 (b)	Grade II*	Great historic interest
Moderate	Alternative uses; demolition unlikely to be permitted 18 (c)	Grade II	Special historic interest
Moderate to Low	Alternative uses; demolition more likely if alternative uses genuinely unavailable 18 (d)	Local List	Local interest
Low	Demolition an option within context of sustainability 18 (e)	Unlisted	Without interest, subject to review for statutory or local list

- 20 The table is simplified and outcomes are deliberately described as no more than ‘likely’. ‘High’, ‘moderate’, and ‘low’ valuations for heritage significance must always be considered together with the circumstances of the particular case, that is to say both the quality of the building and its potential scope for uses.

- (a) All 'highs' would normally mean preservation as a monument of outstanding heritage values but should not preclude an unusual one-off use that would secure useful life and preservation without significant adverse impacts.
  - (b) All 'lows' might indicate high potential for demolition but would still require evaluation of sustainability issues and a clear demonstration of the superior benefits of the new use proposed for the site.
  - (c) Alternative use also requires a flexible approach. There are cases where the greatest significance might be in the interior, the contents, or the decorations and fittings of the church; if the exterior and the immediate setting are of lesser significance, there may be scope for alteration or extension to facilitate access or insert an appropriate parallel use to help sustain the interior. In other cases, exceptional exteriors, or the combined values of church and setting as features in the landscape or townscape will constrain external development, while the lesser quality of the interior offers greater flexibility in inserting alternative uses.
  - (d) Demolition of a listed building is subject to tests described in PPG15, and these may also be applicable to unlisted buildings in Conservation Areas. These tests apply fully, notwithstanding that the subject may be a church formerly exempt from listed building controls.
- 21 However, flexibility must have its limits. If the first chosen use fails, consideration of alternatives must have regard for the analysis of heritage values made at the outset, and perhaps embodied in a Statement of Significance and / or a Management Plan. There should be a general presumption against automatically looking to the next least damaging use if it is one that would have been rejected originally on account of its impacts.

### Factors affecting uses

- 22 A church's 'usability' can be assessed in a two-part check-list, drawing on the ICA.

The first part deals with the flexibility for change afforded by its heritage values (church, contents, churchyard, context, totality).

- Scope for internal subdivision: horizontal, vertical
- Scope for inserting basic facilities
- Scope for extensions
- Scope for development in the churchyard (freestanding or attached)

The second part deals with circumstances generally unrelated to heritage values but often of critical importance in securing a suitable use and mostly related to interests of the local planning authority.

- Extent of dilapidation (not relevant to determining heritage values, but does affect the economics of re-use)
- Physical location in settlement
- Strategic access from highway network, including public transport and tourist routes
- Local access to the churchyard, across it to the church, and into the church.
- Parking

- DDA: reasonable compliance
- Social and economic context in settlement / community
- Context of Local Development Framework: development opportunities and constraints e.g. location in relation to flood plain.

Both parts of the list seen together would summarise clearly the reasons why particular outcomes from the list in paragraph 18 above should be considered further or rejected.

- 23 Viability of use and the opportunities or constraints of circumstances can change. A church of high heritage values, whose acceptable alternative use has failed, could be vested for preservation, either in the Churches Conservation Trust or in another organisation with assured conservation credentials. Similarly, 'last resort vestings' could be divested into a late-appearing acceptable conserving use that can be guaranteed to retain its heritage values.
- 24 As indicated in paragraph 1, there will be many cases of churches that are neither self-evidently vestable in the CCT nor capable of taking a benign use. Some churches are likely to be remote or in open countryside, where planning policies either preclude conversion or create a presumption in favour of job-creating uses which tend to damage its character. Others may lie in urban areas where depressed market conditions generate only underfunded, short life and poor quality conversions. These will be the most intractable problems, but have to be accepted as part of the overall picture. Ensuring that appropriate organizational and funding arrangements are made is in the interest of both the nation and the local community.