



The IHBC National Office
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Dear Sir

Review of the Mission and Pastoral Measure 2011

The Institute of Historic Building Conservation is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

We are very pleased to have the chance to comment on the consultation document. The Institute's comments are as follows:

The Institute understands that for all the reasons outlined in Mission in Revision closures are more likely to be proposed in the next few years. This may weigh especially heavily on large rural Dioceses. Sometimes closure sooner may be better for the building than a lingering partial use and partial maintenance especially if a community reuse is found. But it may also be beneficial to keep the church in a community use, even if on a different legal footing or used by different church or community group. The proposal for regularising a community use into the MPM could allow for churches to become a more positive community focus whilst also involving those in the community who have not previously wanted to get involved in the church. But it is optimistic to think that this model will work in more than a few situations. Likewise extending the care of churches and churchyards into more Trusts, both local and national is very worthwhile and can work very well, but it requires substantial financial backing for the trusts to be able to take on the church and then continue to support it.

There is no consultation question for paragraphs 121 -23 and the majority of the Institute's concerns are around these proposals.

The Institute also believes in the tenets cited in Paragraph 122 that the original use is the best use for a building, and that each building should be considered on a case-by-case basis.

In consideration of other uses we do not support any proposals which could lead to the widening the opportunities of residential conversion of redundant historic churches without very careful individual consideration. Not all buildings can be successfully converted. The most successful, sensitive and creative conversions can usually be achieved without substantial internal subdivision and poor-quality ill-conceived conversions which try to put standard domestic layout into a unique building are more likely to be contentious.

We do not support the concept of a deemed consent for the residential conversion of unlisted church buildings which are not in conservation areas, or indeed for any building. Consideration needs to be given to each building on its own merits regardless of its protected heritage status or otherwise.

Although we support the need to establish future use as soon as possible we do not feel this can be achieved by reducing due process and do not support proposals for parallel marketing of churches for both community and other uses (Paragraph 122). Experience of similar dual marketing in cases of redundant farm buildings almost always leads to proposals for conversion to residential and not for proposals for any other employment use. In both of these building types residential use is almost always the highest value re-use particularly in rural areas. Even when churches are being marketed solely for community or employment use, the majority of approaches to the local authority generally concern residential conversion. Marketing of churches for residential uses alongside community-based uses is likely to result only in many more inappropriate and damaging residential conversion proposals. Church marketing campaigns can simply include placing a church with a residential estate agent alongside similarly priced houses and waiting; more positive and proactive marketing, working with the community to establish potential uses is required and could be an area of work to develop in Dioceses and fund appropriately.

Paragraph 122 may be intended to make a point about flexibility in reuse but it is worded to result in sounding critical of Historic England's accepted and justified approach to the future use and conservation of historic buildings. Simplification of process appears instead as a desire to exclude Historic England and fast track closing churches whilst finding a process which might include a greater willingness to accept the sub-division of interiors to facilitate conversion to residential use. Historic England should be included in all discussions on reuse of churches from the outset and should not be presented with a fait accompli at a later stage in the process.

It is crucial to ensure that any churches being considered for disposal should always have a proper assessment of heritage significance, including the significance of internal spatial qualities and the contribution of setting.

The sale of redundant churches should be accompanied by appropriate legal safeguards, such as restrictive covenants, to avoid inappropriate and harmful re-use.

Question 19. Do dioceses need powers to ensure the repair of church buildings in use? We support the proposal to give dioceses the ability to complete basic and necessary repairs to keep the buildings wind and watertight if the PCC can no longer function or lacks the resources. (Paragraph 110)

Question 21. Do you believe that there continue to be benefits in the Church retaining the SAC to provide separate independent advice in dealing with the future of closed church buildings?

Historic churches are key in our historic towns and villages. Closure should be given consideration by people with appropriate expertise and community consultation and should not necessarily be a fast or simple process. The role of the Statutory Advisory Committee should be maintained or other equivalent appropriate expert advice added to the process.

Question22. Do you consider that the arrangements for consultation with Historic England might better align with the secular planning system?

Historic England should not be excluded from the early consultation process and should be included in all discussions on reuse of churches from the outset and should not be presented with a fait accompli at a later stage in the process.

Yours sincerely

Fiona Newton
IHBC Operations Director