



HER 21 PROJECT 6024

USING HISTORIC ENVIRONMENT RECORDS UNDER THE REVISED ECCLESIASTICAL EXEMPTION ORDER 2010

FINAL REPORT

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Summary & Recommendations

This project has studied the relationship in Cambridgeshire between the denominations that operate the Ecclesiastical Exemption Order 2010 and the Historic Environment Record held by Cambridgeshire County Council. The revised order places a direct obligation on denominations to interact with and make use of HERs, and the main purpose of the project was to assess how this could be achieved most effectively and to a mutual benefit.

The project looked in detail at the current content relating to places of worship held in the CHER, and also at the options for enhancement of records. It also considered how HER data can inform wider management of places of worship by raising awareness of the archaeological potential of a site or location through consideration of its wider context. Examples of both have been included.

The project also assessed the current operation of the exemption by the relevant denominations, setting out their processes and determining the extent and creation of heritage input, together with looking at guidance notes where issued. Arising from this was an understanding of the differing priorities and concerns of all the denominations, and also the extent to which heritage and archaeology input to their processes. In particular it sought to address three original questions and added a fourth:

1) What historic environment information does an exempt denomination require to meet its obligations?

To be equivalent to secular planning procedures, the denomination is required to demonstrate an understanding of the heritage significance and setting of a listed place of worship or other exempt heritage asset. This should include a thorough understanding of the structure, surroundings (above and below ground) and interior and be produced in a report such as a statement of significance.

2) How do HERs meet that requirement and what additional enhancement would be required to do so?

HERs do not consistently have detailed information on the building or interior and will require major enhancement work to do so. However, it will contain important information on the archaeological background to a site, an aspect of significance that denominations do not appear to have previously considered. The strength of an HER lies in its ability to be an index of information, especially where unpublished or otherwise unknown sources may exist that the exempt denomination may not be aware of. This report gives short and long term recommendations for enhancement to places of worship records that draw on these strengths.

3) What information generated under the processes of the exemption can be usefully added to HERs?

Each denomination produces heritage based reports as part of its stewardship. Variations on the Statement of Significance are common to all, which should encompass all the requirements of Question 1 and be complemented by the further justification of the work from a pastoral perspective. These documents potentially

provide an up-to-date assessment of significance of the heritage asset proportionate to the level of change proposed, and can be used by an HER to build up a 'library' of information about the place of worship. Additionally, proposed works can lead to archaeological projects, or records of changes, all of which should be sources or events in the HER. Finally, HERs are also capable of recording the permissions granted through keeping an Index of faculties or permissions in the same way that they records consents on scheduled monuments.

There are examples of proactive initiatives by denominations to help with understanding the heritage of places of worship. These include the 'Taking Stock' programme being undertaken by the Catholic Church in England and Wales and also the use of Conservation Management Plans by the Church of England on the most important sites. Because of the scope, level of detail and professional authorship of these they are invaluable sources for the HER.

Procedures for the closing of places of worship can also produce heritage-based reports (see Question 4 below).

4) What processes for redundancy are in operation and to what extent 'heritage significance' plays into them?

Each denomination has procedures for closing a place of worship and its subsequent passing from the exemption to full secular control. These can include assessments of heritage, but these range from cursory to comprehensive. Where produced, they would be important sources for the HER, and by increasing the range of information under Question 3 that the HER holds, would go some way to ensuring that detailed information about the site is readily available in the future.

The outcome is a series of recommendations for both HERs and the denominations that show how in some cases small changes to guidance notes or through the proactive dissemination of archaeological data, can result in significant improvements to the level of interaction between denominations and HERs.

Abbreviations & Acknowledgements

The following abbreviations have been used throughout this text.

BUC	Baptist Union Corporation
BUGB	Baptist Union of Great Britain
CBA	Council for British Archaeology
CBC	Church Buildings Council (CofE)
CCEW	Catholic Church in England & Wales
CCT	Churches Conservation Trust
CHER	Cambridgeshire Historic Environment Record
CIS	Critical Information Summary (CofE)
CMP	Conservation Management Plan (CofE)
CofE	Church of England
DAA	Diocesan Archaeological Advisor (CofE)
DAC	Diocesan Advisory Committee (CofE)
DCLG	Department for Communities & Local Government
DCMS	Department for Culture, Media & Sport
DMPC	Diocesan Mission and Pastoral Committee (CofE)
EE	Ecclesiastical Exemption
EH	English Heritage
HCC	Historic Churches Committee (CCEW)
HE	Historic Environment
HER	Historic Environment Record
ICA	Informed Change Assessment (CofE)
LBAC	Listed Buildings Advisory Committee (URC, Methodist Church, BUC)
LPA	Local Planning Authority
NADFAS	National Association of Decorative & Fine Arts Societies
PCC	Parochial Church Council (CofE)
PM	Pastoral Measure (CofE)
PoW	Place of Worship
PPS5	Planning Policy Statement 5: Planning and the Historic Environment
RCHM(E)	Royal Commission on Historic Monuments (England)
SAC	Statutory Advisory Committee on Redundant Churches (CofE)
SoJ	Statement of Justification (BUC)
SoN	Statement of Need (CofE, Methodist)
SoS	Statement of Significance (CofE, URC, Methodist)
SPAB	Society for the Protection of Ancient Buildings
SPC	Synodal Property Committee (URC)
URC	United Reformed Church
VCH	Victoria County History

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Introduction & Scope

This project has focussed on a particular aspect of the updated Heritage Protection system: the Ecclesiastical Exemption. Recent guidance on the Exemption stresses the function of historic environment records in the process, thus bringing the exemption more into line with mainstream planning protocols. However the exemption has specifically defined processes, and it is unclear whether HERs are capable of supporting this new function.

Using the geographic area of Cambridgeshire as an example, this project has assessed the requirements of the exemption as operated by the exempt denominations against the level of HER data held in the Cambridgeshire HER, and identifies points of contact and areas for enhancement. It has also considered the products of the exemption processes, and whether these can usefully add to HERs.

Background

Heritage Protection Reform has taken on many angles and facets, and despite the lack of the reform bill, many of the priorities and ambitions of HPR have driven and informed other aspects of ongoing stewardship of the historic environment, in particular PPS5 and Conservation Principles.

Previously, ecclesiastical bodies have operated equivalence systems for listed building control in parallel to the secular system under the Ecclesiastical Exemption, part of the Listed Buildings and Conservation Areas Act 1994. There are five exempt denominations that operate in Cambridgeshire:

- Church of England
- Catholic Church in England & Wales
- Methodist Church
- Baptist Union of Great Britain
- United Reformed Church

All have developed their own processes for operating the exemption that technically demonstrate equivalence the secular listed building control. Exemption does not apply to Scheduled Monument Consent under the Ancient Monuments & Archaeological Areas Act 1979, or to works requiring planning permission.

The recent Government Statement on the Historic Environment for England 2010 states:

“That the value of the historic environment is recognised by all who have the power to shape it; that Government gives it proper recognition and that it is managed intelligently and in a way that fully realises its contribution to the economic, social and cultural life of the nation.”

Of the six broad strategic aims identified the following are directly relevant:

- **Protective Framework:** Ensure that all heritage assets are afforded an appropriate and effective level of protection, while allowing, where appropriate, for well managed and intelligent change.

- **Local Capacity:** Encourage structures, skills and systems at a local level which: promote an early understanding of heritage in the context of development; ensure that local decision makers have access to the expertise they need; and provide sufficiently skilled people to execute proposed changes sensitively and sympathetically.
- **Public Involvement:** Promote opportunities to place people and communities at the centre of the designation and management of their local historic environment and to make use of heritage as a focus for learning and community identity at all levels.

Planning Policy Statement 5 (2010) has replaced Planning Policy Guidance Notes 15 (1994) and 16 (1990), and governs works on designated and non-designated historic assets, including historic buildings. Together with the Government Vision on the Historic Environment and the English Heritage Practice Guide, it sets out objectives and best practice for stewardship of the historic environment, including many of the changes and developments of the 15-20 years of practice under the former PPGs, including a greater role for Historic Environment Records as a central information resource. The government's objectives for PPS5 are crucial here:

The Government's overarching aim is that the historic environment and its heritage assets should be conserved and enjoyed for the quality of life they bring to this and future generations. To achieve this, the Government's objectives for planning for the historic environment are:

- *to deliver sustainable development by ensuring that policies and decisions concerning the historic environment:*
 - *recognise that heritage assets are a non-renewable resource*
 - *take account of the wider social, cultural, economic and environmental benefits of heritage conservation; and*
 - *recognise that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term.*
- *to conserve England's heritage assets in a manner appropriate to their significance by ensuring that:*
 - *decisions are based on the nature, extent and level of that significance, investigated to a degree proportionate to the importance of the heritage asset*
 - *wherever possible, heritage assets are put to an appropriate and viable use that is consistent with their conservation*
 - *the positive contribution of such heritage assets to local character and sense of place is recognised and valued; and*
 - *consideration of the historic environment is integrated into planning policies, promoting place-shaping.*
- *to contribute to our knowledge and understanding of our past by ensuring that opportunities are taken to capture evidence from the historic environment and to make this publicly available, particularly where a heritage asset is to be lost.*

(PPS5 para 7)

This is elaborated upon in the Practice Guide as follows:

The PPS sets out the Government's objectives for the historic environment and the rationale for its conservation. It recognises the unique place the historic environment holds in England's cultural heritage and the multiple ways it supports and contributes to the economy, society and daily life. The PPS also identifies the historic environment as a non-renewable resource. Its fragile and finite nature is a particularly important consideration in planning. Conserving this resource for future generations accords with the principles of sustainable development. Government places a priority on its conservation and has set out tests to ensure that any damage or loss is permitted only where it is properly justified.

(English Heritage Practice Guide para 8)

The same language and priorities can be seen in the guidance for the revised Ecclesiastical Exemption Order 2010. This creates a role for the country's Historic Environment Records in the operation of a working and fit-for-purpose procedure under the Exemption. The final version of the guidance (July 2010) states:

"It is.....vital that the exempt denominations build up links with Historic Environment Records." (para 42)

It further advises that:

"It is important that the systems run by the denominations take account of the need to seek information from the local HER as soon as possible after receiving an application for works or development. It is preferable that this consultation is undertaken by the applicants themselves at the pre-application stage in order to help shape their proposals;" (para 43)

The importance of the link between exempt denominations and HERs is further emphasised:

"Following works, copies of any reports concerning historical or archaeological investigations of the site should be deposited with the local HER, including investigations undertaken as a condition of any consents, both internal to the denominations or external. This will help to disseminate knowledge of the site and will inform anyone undertaking work on the site in the future." (para 44)

The guidance however does make assumptions on the content and quality of HERs which practical experience suggest may not be wholly accurate. The change in emphasis within the revised order requires a piece of work to assess how this relationship is best managed. Traditionally, the exempt denominations have made little use of HERs and their contents.

The 2010 'Heritage at Risk' review has concentrated on Places of Worship at Risk, highlighting the need for accurate information management and full recognition of the significance (heritage or otherwise) of places of worship.

Methodology

The project had several processes operating concurrently. The main priorities were to assess the current scope and future potential of the data held by Cambridgeshire HER, and to develop an accurate understanding of the operations of each exempt denomination.

The former was achieved by extracting places of worship data from the HER and subjecting it to a series of tests and checks to assess its completeness, accuracy, coverage and consistency. This work was undertaken by staff in the HER and the results are presented in Appendix II.

The second strand was a detailed review of the operations of the Exemption. This involved contacting relevant people within the denominations and also those from other agencies and amenity societies. In most cases meetings were arranged to facilitate long discussions around the exemption, and in others emails and telephone conversations sufficed. These contributors are listed in Appendix II.

All discussions with the denominations were guided by a 'script' that prompted the discussions to ensure that all areas were covered. This 'script' is attached in Appendix II.

Part I: Exemption Processes

The Exemption is currently utilised by five denominations within Cambridgeshire. The majority of applications making use of the exemption originate from the Church of England, which is understandable given that the Church of England in particular has a high proportion of the national stock of Grade I and II* buildings, although there is an under-representation of listed buildings amongst other denominations.

Cambridgeshire has nearly 400 places of worship across the five denominations and with the emphasis on closer working with secular HERs, there is a need to align procedures and records to ensure that exempt denominations and secular data sources are compatible and complimentary.

There are four key stages to the processes of the exemption: application, advice, decision and appeal, and two points of direct interaction with the HER, firstly as a provider of information and secondly as a recipient of the products of the process. In summary, these are as follows across all five denominations, together with the equivalent secular process for listed building consent:

Denomination	Baptist Union of Great Britain	Catholic Church of England & Wales	Church of England	Methodist Church	United Reformed Church	Secular Listed Building Control
Applicant	'The Church'	Person responsible for the administration of the building	Anyone but needs a PCC minute	Managing Trustees	Local Church, Trustees or others	Person undertaking works
Advisor (Internal)	LBAC	HCC	DAC, CBC	LBAC	LBAC	Conservation Officer
Decision Maker	Trustees/ LBAC Secretary	HCC	Diocesan Chancellor	Property Office	Synod Property Committee	Delegated powers or Planning Committee
Appeal	Adjudicator appointed by Legal Committee	Commission appointed by Diocesan Bishop	Court of Arches	Appeals Panel	Either a review by SPC or an Appeals Commission appointed by the General Assembly	Secretary of State DCMS (Planning Inspectorate)
Products	Statement of Justification for Alterations from the Church Statement of Significance and Justification from the	'Taking Stock' Reports	Statement of Significance or Conservation Management Plan – approved by DAC Pastoral Measure	Statement of Significance	Statement of Significance – approved by LBAC	Heritage Statement Pre-determination assessment (if required)

Denomination	Baptist Union of Great Britain	Catholic Church of England & Wales	Church of England	Methodist Church	United Reformed Church	Secular Listed Building Control
	Professional Advisor Photographic record of alterations		Report – approved by CBC Critical Information Summary - approved by SAC			
Point of Contact with HER	Preparation of the Statement of Justification from the Professional Advisor Informal advice as part of the pre-application process either to the LBAC, professional advisor or the church.	Preparation of Assessments of Significance 'Taking Stock' assessments	Initial assessment of project (PCC) Preparation of Statement of Significance or Conservation Management Plan (PCC) Assessment by Diocesan Archaeological Advisor (DAC) Preparation of report by case officer (CBC) Report to DMPC (CBC) Assessment of significance and importance (SAC)	Statement of Significance accepted by LBAC	Consultation with Local Planning Authority If requested, direct from LBAC Preparation of Statement of Significance	Preparation of Heritage Statement Preparation of Predetermination assessment

More detailed consideration of the processes of each denomination is given below.

Baptist Union of Great Britain

An underlying principle of the Baptist Church is the independence of each place of worship. Buildings are owned by Trust corporations and applications to make changes to listed structures must be made to the Trustees.

The biggest trust corporation is the Baptist Union Corporation but there are many others, some of which are geographically based and others less so. Not all the trust corporations operate the exemption. The Ecclesiastical Exemption Order of 2010

identifies 10 corporations (including the BUC) that do so and the Listed Buildings Advisory Committee advises trustees of all corporations on cases where the exemption applies. However, it should be noted that a listed Baptist place of worship could potentially fall under the secular system.

Cambridgeshire is part of the Eastern Baptist Association (Trust Corporation). This has the highest proportion of listed buildings of any area with a total of 316 buildings of which one is Grade I, and 11 are Grade II*. Other Trust Corporations are present however: for example the Grace Baptist Trust Corporation act for the Salem Baptist Church in Ramsey (listed Grade II), and guidance issued by this corporation refers to the need for Listed Building Consent for certain works (www.gtbc.org.uk).

The BUC produce some very useful and clear guidance for listed churches wanting to undertake alterations.

http://www.baptist.org.uk/baptist_life/baptist_family/national/corporation.html

http://www.baptist.org.uk/resources/buc_guidelines.asp?section=3

Exemption Mapping

The following applies to cases referred to the LBAC, with some differences whether the church is owned by the BUC or another Trust Corporation.

The BUC can offer informal advice, whether at officer level or through reference to a member of the LBAC. Where a proposal is to be formally considered by the LBAC, the applicant is requested to complete a 'checklist' form and supply a package of papers and supporting information. This is intended to ensure that the LBAC has all the information to hand that it requires to consider the application. The guidance for this includes the requirement to check if the building or local area has been noted as being of special archaeological interest, although the meaning of this could be further elaborated upon.

If the BUC is trustee then the LBAC will arrange for consultations with outside bodies, otherwise the appropriate trustee corporation will do so. Hence this advice is available for the decision making process and it is quite rare for the advice received from an amenity society to be not followed. Other information required includes a Statement of Justification for Alterations from the Church AND a Statement of Significance and Justification from the Professional Advisor. If necessary, a site visit can be convened as well.

The first document is based on mission needs of the church. It is a personal view of the applicant as to why the changes should take place. The second is a professional assessment of the building, its fabric and heritage value drawn up by a professional and detailing proposed impacts and mitigation. This approach of having two documents usefully separates the mission and conservation statements into two clear documents.

The list of documents to support an application is comprehensive and allows the committee to assess and comment on the application. Archaeological input is requested but can originate from a variety of sources:

EITHER the applicants are advised to make checks themselves
 OR the LBAC can issue advice and check
 Or professional advisers can be advised to check as part of their pre-application work

Actual consent is jointly issued by the secretary of the LBAC and the Trustees.

Where any works require archaeological mitigation and are not covered by the secular system, any arising reports would be passed to the appropriate authorities. These would be rare. The issue of archaeological setting is one that also may not be fully addressed. As part of the ongoing management of a listed church, the BUC encourages congregations to maintain a photographic record to be deposited within an HER.

Points of Contact with HER

- Preparation of the Statement of Justification from the Professional Advisor
- Informal advice as part of the pre-application process either to the LBAC, the professional advisor or the church.

Products

- Statement of Justification for Alterations from the Church
- Statement of Significance and Justification from the Professional Advisor
- Photographic record of alterations

The BUC is creating a single register of Baptist burial grounds that would be a useful record for HERs to have access to.

Catholic Church in England & Wales

There are 22 Catholic dioceses of varying size in England and Wales. Catholic Places of Worship are unevenly spread across the country reflecting the spread of the Catholic population in England and Wales from the 19th century onwards. Influxes of Catholics (for example from France after the French Revolution, and from Ireland in the 19th century) had a major influence both on the location and the numbers of churches built. Cambridgeshire is part of the Diocese of East Anglia, which also covers Norfolk, Suffolk and Peterborough. The diocesan office and cathedral are located in Norwich.

The Catholic Church in England and Wales is not run centrally from the Archdiocese of Westminster and there is no central organisation similar to the (Anglican) Church Commissioners. All Catholic dioceses are independent under their own Bishops, who meet in conference twice a year.

Unlike Anglican churches, Catholic churches tend not to be in central locations in towns and cities and are more usually to be found in secondary locations, and in many cases, plain exteriors can hide rich and decorative interiors. This is being confirmed by the on-going 'Taking Stock' projects (supported by English Heritage) that are being completed in most dioceses.

There are approximately 5000 Catholic places of worship in England and Wales, of which some 750 are listed. It is known that there is an under-representation of

Catholic Places of Worship in the statutory lists and about 2/3rds of Catholic dioceses have currently embarked on 'Taking Stock' programmes with financial support from English Heritage. This programme assesses the architectural and historic significance of all churches and chapels within a particular diocese, considering their significance, current level of designation or potential for further listing and sensitivity to change in light of any potential closure. At present, 'Taking Stock' does not currently include assessments of archaeological significance unless there are known designated sites nearby.

Diocesan Historic Churches Committees (HCCs) were created in 1994 as part of the introduction of formalised Ecclesiastical Exemption procedures agreed with the then Department of National Heritage (now DCMS). Some dioceses combined to form multi-diocesan HCCs (e.g. the Southern HCC, Wales and Hereford and the HCC that covers the North-West). Other dioceses operate single diocesan HCCs (as in East Anglia). The Patrimony Committee maintains oversight of the work of HCCs and provides a central source of advice and guidance as required under the Exemption Scheme. The Patrimony Committee organises an annual conference for members of HCCs and those interested in the work of HCCs. Also, HCCs are required to produce an annual report on their activities to the Patrimony Committee and to other interested parties.

There is not the same current pressure for re-ordering Catholic churches as seems now to be the case with Anglican churches and the majority of applications to Historic Churches Committees are relatively small scale and involve for example repairs, redecoration, and new lighting schemes rather than major re-orderings.

The establishment and membership of HCCs is governed by Statutes issued by the diocesan bishop(s). These statutes, together with the Directory which sets out how applications to HCCs are to be determined, were agreed with DCMS as part of the formalisation of the Exemption Scheme. Details on the processes followed by the Catholic Church can be found here:

http://www.catholic-ew.org.uk/Catholic-Church/Catholic-Bishops-Conference-of-England-and-Wales/Departments/christian_life_and_worship/patrimony_committee/historic_churches_committees

When the consultation for the revised Ecclesiastical Exemption Order 2010 took place, the Patrimony Committee expressed concern about the inclusion of HERs into the Ecclesiastical Exemption, stating it would present an unnecessary and essentially unhelpful bureaucratic burden on diocesan Historic Churches Committees (HCCs), and that there was currently little benefit to HCCs or others involved with the protection of Catholic places of worship in accessing HER data.

Exemption Mapping

The Directory on the Ecclesiastical Exemption from Listed Building Control issued by the Bishops' Conference sets out the procedures to be followed by HCCs in determining applications for Faculty.

The CCEW applies its processes to 'relevant works' carried out on a listed church, oratory or chapel used for worship and subject to a diocesan bishop, and any listed

ecclesiastical building (except a presbytery) belonging to a religious institute or society which is used for ecclesiastical purposes. Relevant works is defined to mean anything that would affect the character of the building or its archaeological importance.

The applicant is responsible for the formal application to the Secretary of the diocesan historic churches committee. Before doing so, the applicant is strongly encouraged to undertake all relevant consultation including gaining the permissions/views from any religious order, relevant diocesan commissions and informal consultation with the HCC.

The application must be accompanied by detailed plans and drawings and the most recent quinquennial inspection report. This should include an assessment of the significance of the proposal and its impacts.

Once received, the HCC secretary sends out the papers for the public consultation to commence and will consult the Local Planning Authority, English Heritage and the appropriate amenity societies. These consultations all run for 28 days concurrently.

The HCC will consider the application together with responses received. The applicant may make representations direct to the HCC if they wish to do so. The CCEW is the only denomination to routinely allow this.

The membership of the HCC is defined under the Statutes to include members with sufficient expertise to determine an application but where a specific aspect of knowledge is lacking the HCC may ask the bishop to appoint an additional advisor.

The HCC approves (conditionally or otherwise), modifies and approves or rejects any applications. Appeals against the HCC decision may be heard by a commission appointed by the bishop and details of this procedure set out in *The Guidelines for Appeals* also issued by the Bishops' Conference.

With closed or redundant churches, the Diocese of East Anglia has a policy that was adopted on 14 December 2006. The main responsibility for ensuring due process is followed rests with the diocesan bishop.

The first stage is for the priest to undertake a consultation with the Parish Community. At the same time, the title deeds are checked for appropriate provisions, and an assessment of the history of the church and its contents is undertaken. If the church is not listed, the HCC will be asked for an opinion as to the likelihood of it being spot listed. Other views as the use and desirability of closing the church will be sought from within the diocese and informed by all this evidence and assessment, the bishop will decide whether or not to allow the closure to progress. Dioceses that have undertaken a 'Taking Stock' assessment will be able to draw upon this report at an early stage of any procedure.

With listed churches under consideration for closure, the Bishop will commission an expert report into the building and its contents. Following this report, the HCC will make recommendations to the bishop as to possible uses for the building based on its significance and potential for change, which will help inform the bishop's deliberations. With listed buildings, the HCC Secretary will notify the Local Planning

Authority and English Heritage should the church be closed and thus fall outside the Exemption.

The Catholic Bishops' Conference of England Wales also has guidance on the disposal or retention of objects from the church.

Points of Contact with HER

- Preparation of Assessments of Significance
- 'Taking Stock' assessments

Church of England

The main distinction between the Church of England and others is the scale of the work and building stock. There are over 16000 Anglican places of worship in the country, of which over 70% are listed. Of the 350 listed active Places of Worship in Cambridgeshire, over 300 are Anglican and nationally the percentages of Grade I and II* buildings are far higher than the average for listed building stock.

A key distinction is that, unlike the other denominations, the Anglican Faculty Jurisdiction system (which incorporates the Ecclesiastical Exemption function) applies to all works to all churches, not just works to listed buildings that would otherwise require listed building consent. The comments regarding the nature of the building stock means that much of work considered by a Diocesan Advisory Committee does relate to listed buildings, but the type of works is often minor and would not ordinarily require LBC. The same level of scrutiny is applied regardless but clearly greater emphasis on heritage matters is placed on a listed building.

The work has not considered Ely Cathedral. This has in place a separate process for the management of its heritage through the Fabric Advisory Committee, which is responsible for advising the Cathedral Chapter on matters relating to the care, conservation and development of the cathedral, and for determining applications for approval of all categories of proposed works specified in the 1990 Care of Cathedrals Measure 1990 (amended 2005), except those applications required by that Measure to be made to the Cathedrals Fabric Commission. The Chapter must appoint a Cathedral Architect or Surveyor of the Fabric for the cathedral church, and an architect or surveyor for other properties that it owns. It must also appoint a Cathedral Archaeologist.

Both appointees advise the FAC, and unlike the relationship between the diocesan system and Church Buildings Council, the Cathedrals Fabric Commission is a permission granting rather than advisory body. However, cathedrals and their precincts are hugely important heritage assets and it is vitally important to be fully aware of this significance. A good example (outside the diocese of Ely) is the master plan for the cathedral and precincts at Peterborough which was drawn up with input from the Peterborough City Archaeologist and English Heritage.

Exemption Mapping

The Church of England's processes are more extensive than others and involve several elements of their structure. The legislation that defines the processes is the

Care of Churches and Ecclesiastical Jurisdiction Measure 1991, although the principle of faculty jurisdiction dates back centuries, and can be found here:

<http://www.legislation.gov.uk/ukcm/1991/1/contents>

Dioceses will issue their own guidance that can vary across the country, and additionally there is a central resource called Churchcare:

http://www.ely.anglican.org/information/care_of_churches/guide_to_faculty.html
www.churchcare.co.uk

1) Diocesan Level

Usually the Parochial Church Council defines the scope and objective of works although technically anyone can apply for a faculty. Early consultation is recommended with relevant parties/stakeholders (e.g. Amenity Societies, English Heritage, Local Planning Authority, Church Buildings Council) to help develop the proposal. On major schemes, an early site visit is often used to gain initial views.

Each diocese has a slight variation on this process. Some Diocesan Advisory Committees will help arrange meetings by contacting relevant organisations/consultees themselves; others leave it to the PCC to own the project and make the arrangements.

The application is made to the Chancellor.

“The DAC's main role is in advising the Chancellor of the Diocese in connection with applications for Faculties to authorise the carrying out of works to churches and churchyards, but the DAC is willing to give preliminary advice to Parochial Church Councils prior to their making applications for Faculties.”

Peterborough Diocesan Registry

The PCC will liaise with the DAC (via its Secretary) to assemble all the paperwork and necessary opinions. The DAC will consider the proposals and submissions, and refer back, request more information and discuss as necessary.

The DAC will also attempt to rationalise potentially conflicting views on cases, especially where the heritage/mission ‘conflict’ may be strong. DACs will often have guidance notes or other material for applicants and PCCs. Some DACs have archaeological policies.

A Statement of Significance is prepared by the PCC and submitted to the DAC (and if necessary other consultees). The DAC will advise and assist with the development of this document. Guidance is available from the Church Buildings Council.

Where a church is of such complexity that a Statement of Significance is insufficient to assess it, the CBC recommends the use of Conservation Management Plans. These go into greater detail on a church and its setting. One such document is under preparation for Great St Mary’s Church in Cambridge. There is an issue with these that they require extensive synthesis of a large amount of HER data to be useful, skills which may be beyond the capability of the compiler of such reports, and it is

unlikely that a HER would provide such a synthesis without some financial recompense.

The Diocesan Archaeological Advisor will offer archaeological input and insight to cases in discussions with the PCC and the DAC. This will include setting out requirements for evaluation and mitigation as appropriate and (if necessary) liaising with secular planning archaeologists on cases where planning consent is required from the Local Planning Authority.

The DAC will issue the faculty application form together with a recommendation to the Chancellor that will include any conditions or suggestions. The views of consultees are also passed to the Chancellor who will then make a decision to either approve (with or without conditions) or reject the proposal.

Archaeological requirements arising from faculties should create reports that would be lodged with the HER.

It is feasible (and happens) for a PCC to proceed with an application to the Chancellor where the DAC recommends refusal. Equally, the Chancellor does not have to agree with the DAC's recommendation. It can also happen that the advice of a consultee (such as an amenity society) cannot be reconciled with the positions of the applicant or DAC and as such all views will be considered by the Chancellor.

As part of the application process the Diocesan Registry will publicise the application for 28 days, invited Notices of Objection. Where these are received, the Chancellor may call for a consistory court hearing to allow representations to be made. It is possible for statutory consultees to lodge Notices of Objection and become party to the proceedings. Appeals against consistory court decisions must be made to the Court of Arches.

2) Central Advice

The Church Buildings Council is potentially a consultee on faculty cases. There are details of the criteria for referrals on the CBC website, and referrals can come from PCCs, DACs or a diocesan Chancellor. A case officer will undertake an assessment of the referral and either deal with it through informal advice, or prepare a report outlining the case and background, often after a site visit, and present this with recommendations and supporting papers to the full CBC. The CBC advice is then passed to the referrer.

CBC reports rarely include an archaeological assessment beyond anything that was supplied by the referrer.

The CBC staff includes an Archaeology Officer and the membership of the council has to include someone with expertise in archaeology to complement the wide range of knowledge available to draw upon.

3) Closed & Closing Churches

Redundant church procedures as practised by the Church of England include stages that cover both the exemption and otherwise. Pastoral Measure reports are created to inform the Diocesan Mission and Pastoral Committee of the potential significance

of a Place of Worship that may be under consideration or pressure for closure. They are narrative reports that describe the architecture, contents and appearance of a church but do not always seek to independently verify information. Archaeological input is usually limited to major sites such as designated assets but reports will have an opinion on archaeological importance with a caveat to approach the county archaeologist.

Not all churches that have PM reports go to closure. Those that do will be referred by the dioceses to the Closed Churches Division of the Church Commissioners, which considers alternatives and options for the building and its contents, taking advice from the Statutory Advisory Committee of the Church Buildings Council.

The SAC prepares reports that consider the significance and importance of the building, its surroundings, setting and contents (Critical Information Summary) and the potential for change to it (Informed Change Assessment). These documents are prepared by staff for discussion and approval by the SAC's members before going to the Commissioners with a recommendation.

Subsequent alternative proposals and changes to closed buildings may also be referred back to the SAC where the original proposal did not take place or where the Commissioners retain an interest (usually through a covenant) in the building. Additionally the SAC advises the Churches Conservation Trust, and will prepare similar documentation for referrals from that body. The SAC's membership is drawn from the main CBC and is also required to have a member with expertise in archaeology.

Archaeological input to these documents is taken from online searches, usually PastScape. Occasionally referrals are made to HERs. CIS reports are more objective than PM ones, and will seek to verify many levels of detail. ICAs are more subjective. These reports need to assess the setting of the place of worship to an extent beyond that seen in the reporting process thus far.

Points of Contact with HER

- Initial assessment of project (PCC)
- Preparation of Statement of Significance or Conservation Management Plan (PCC)
- Assessment by Diocesan Archaeological Advisor (DAC)
- Preparation of report by case officer (CBC)
- Report to DMPC (CBC)
- Assessment of significance and importance (SAC)

Products

- Statement of Significance or Conservation Management Plan – approved by DAC
- Pastoral Measure Report – approved by CBC
- Critical Information Summary - approved by SAC

Methodist Church

There are 580 listed Methodist Places of Worship, of which 3 are Grade I and 40 Grade II*. The remainder are Grade II. In addition there are a further 1300 Places of

Worship in Conservation Areas. They are mainly Victorian Chapels. The oldest dates from 1739, although some buildings contain earlier elements, especially on Places of Worship leased from the Anglicans (e.g. an 18th century structure attached to a 13th century tower).

All Methodist Places of Worship are technically owned by Trustees (custodians) based in Manchester but are managed locally.

The Methodist LBAC operates nationally and it meets quarterly. It has an archaeologist member, currently the county archaeologist for Cumbria. Where necessary this person would supply details for any briefs for archaeological works. The Terms of Reference, including a requirement for archaeological input, were agreed with DCMS in 1994. The LBAC currently has 11 members.

Details on the processes followed by the Methodist Church can be found here:

<http://www.methodist.org.uk/index.cfm?fuseaction=churchlife.content&cmid=1132>

Exemption Mapping

Permission for most works to Methodist Places of Worship is usually granted by the District Synod. However where the works are to a listed building or a building in a conservation area the Conservation Officer must be approached and approval sought before the District Synod gives consent.

Requests to the Conservation Officer must be accompanied clear details and supporting documents including:

- Statement of Significance
- Statement of Need
- Drawings (existing, proposed, site plan, OS Map and detail drawings)
- Photographs

Guidance exists for the compilation of Statements of Significance and Need.

The Conservation Officer decides if a case has to go to the LBAC for consideration by members or whether it is simple enough to resolve directly. As a guide, a case that would require Listed Building Consent in the secular system would go to the LBAC.

There are 3 levels of referral:

EITHER proposals passed to the Conservation Officer
OR proposals deemed by the Conservation Officer to require further detail before advice
OR cases taken to the LBAC

The Conservation Officer will undertake the appropriate consultation required with the Local Planning Authority, English Heritage and amenity societies. Their views are taken into consideration when compiling the report to the LBAC.

The LBAC considers the proposal, submissions and reports and comes to a recommendation that is passed to the Methodist Property Office who will issue approval, approval with conditions or refusal. This decision has to be made before schemes are submitted to the District Synod for approval.

The decision of the Property Office can be appealed.

There are no formal procedures involving the LBAC for redundancy. The Conservation Officer will get involved with advice on options for the more significant closed churches but the responsibility for maintenance and future use rests with the circuit.

Points of Contact with HER

- Statement of Significance accepted by LBAC

Products

- Statement of Significance

United Reformed Church

Cambridgeshire is part of the Eastern Synod, which covers an area roughly bounded by the A1, M25, the east coast round to (but excluding) Peterborough. It has approximately 140 Places of Worship, of which 40 are listed. All are Grade II except 3 Grade II*. There are no Grade I. There is one peculiar as defined under the revised Ecclesiastical Exemption Order: Westminster College in Cambridge, the URC's training college, has a chapel.

The Eastern Synod Listed Buildings Advisory Committee is expected to have access to certain skills and expertise. Current members include a non-URC architect, a minister, a local authority conservation officer and an organs' specialist, plus an ordinary lay member. This composition is intended to reflect the requirements of 'equivalence' under the exemption with the mission needs of the URC. There are no term appointments, which helps circumvent any skills shortage.

Graveyards are an issue with some URC sites. There is no special treatment similar to that arising from the Church of England consecration process so any matters the treatment of human remains are treated as a secular/coroner matter.

Within the URC, Places of Worship are held in trust at Synod level, and the Elders of the congregation act as administrative trustees, responsible for the day to day operation and maintenance of the structure. Ministers are not responsible for the buildings but the congregation. No specific guidance is issued on the maintenance of the buildings.

Details of the URC exemption processes can be found here:

http://www.urch.org.uk/what_we_do/plato/procedure_for_the_control_of_works_to_buildings

Exemption Mapping

Proposed works are put forwards by a conservation architect acting on behalf of the Elders of the church in question.

If listed, the proposal will need to go to the Synod Property Committee via the appropriate Listed Building Advisory Committee. The Property Committee is notified and a full submission made to the LBAC via the Secretary. The application should have all supporting information, including a Statement of Significance and Access Statement.

The LBAC Secretary will:

- Check the application and seek additional details if necessary
- Arrange for any site visits.
- Send details to the statutory consultees
- Ensure public notification takes place
- Consult with all parties

The LBAC notifies the Property Committee of its advice, usually within 10 weeks (which can be extended). This will include:

- Copies of all plans and suggestions
- Details of consultations undertaken and responses received

The applicant has the right to appeal directly to the Property Committee if the LBAC is perceived to have failed to discharge its obligations or worked within agreed timescales.

LBAC options are to support the proposal or not support either in whole or in part. If the latter, the applicant has the right to go ahead with the application to the Property Committee. Should they do so, the applicant should supply the Secretary of the Property Committee with any additional supporting or amended information. The Secretary shall then undertake further contact with the statutory consultees, including the LBAC.

When coming to any decision, Property Committee will consider all the information from the applicant and LBAC, plus any other supporting information from consultees and can either Approve (with or without conditions) or Reject the application. This decision shall be notified to the LBAC and consultees. The Applicants have a right of appeal.

Upon completion of the works, the applicants will supply a declaration confirming the work has been done to the approved designs and in accordance with any conditions. Record keeping is the responsibility of the synod, which will also undertake monitoring of projects to ensure compliance.

A Place of Worship can be closed by the church meeting or the governing body of a peculiar, or if neither exist, by the Synod. In such cases the synod will notify the local planning authority.

Points of Contact with HER

- Consultation with Local Planning Authority
- If requested, direct from LBAC
- Preparation of Statement of Significance

Products

- Statement of Significance – approved by LBAC

Part II: Cambridgeshire Historic Environment Record

Cambridgeshire HER is part of the national network of nearly 90 such records that form the primary source of information relating to the historic environment in the UK. It contains information about archaeological sites, artefact findspots, fieldwork, listed and historic buildings and landscapes and consists of a computerised database and supporting archive and resources created to national (MIDAS) standards.

It contains information on:

- 18000 archaeological sites, finds and buildings
- 3200 excavations and surveys
- 280 scheduled monuments
- 7200 listed buildings
- 34 registered parks

This is supported by:

- 2800 unpublished excavation reports
- Publications and local journals
- Photographs and drawings

Until recently it was known as the SMR, or Sites and Monument Record, as it concentrated purely on archaeological site data. It has its origins in the 1950-60s when the Ordnance Survey collated archaeological records for mapping purposes that in turn created paper index cards. These were passed to the County Council in the early 1970s, and a systematic collection of archaeological information was started that still continues. The card indexes were replaced in the 1980s with the first computerised system, thus enabling easy retrieval of information, and the paper maps were all transferred to a Geographic Information System in the 2000s.

Since the first use of computer technology, the HER has continually developed so that it now makes use of the industry standard Exegesis SDM system called HBSMR. The transition from SMR to HER was partially as a result of both the huge increase in information added as a result of the 1990s expansion of developer funded archaeology and also from the increased demands placed on the HER as its role in both strategic and local planning expanded.

This has added to the range and quality of data held in the HER, further increased by ongoing enhancement projects such as a recent project that added hundreds of new sites identified from survey of aerial photography dating back to the 1920s. Other examples of enhancement work include Historic Characterisation work and the inclusion of Portable Antiquities Scheme data. However increasing quality in some areas has highlighted areas of weakness that could be targeted for future enhancement work, such as Places of Worship.

Review of CHER's Place of Worship Data

Methodology

A specific search for all records containing 'Place of Worship' as a monument type produced 392 monument records. 110 records were sampled, ensuring that a variety of denominations, geographical locations, age of the buildings and date the records were created were included. It is unclear as to whether all churches sampled are covered by the Ecclesiastical Exemption, as often the denomination of the church was not referred to in the record.

It also included a number of cases where the church either ruined or declared 'out of use,' and so not covered by the exemption. Information recorded included Listed Building status, description details, sources used, geospatial information and details of associated monuments. Full details can be seen below.

What does the data contain?

The data contained in the monument tree is very basic, with most records merely containing a monument record for the church. A number have used the 'Components' option to list specific architectural features, although this has been used inconsistently.

The features recorded using the components tab differ from record to record.

About half have associated finds, usually referring to the fixtures and fittings within the church building. The information in the monument description is fairly comprehensive, and most sources have been added and referenced to a high standard. Architectural features were added to the monument tree as components in approximately a quarter of records sampled, but did not appear to follow any guidelines. Such features are usually referenced in the description, and also occasionally added as a find.. The features added to the tree appeared to have been quite selective.

Fixtures, fittings and monuments were usually described within the monument description, and in a minority of cases are also indexed as a find within the tree. Records of the church bells appeared to be comprehensive, as most of the records sampled contained information on these.

What range of source materials are used?

The most common sources used were Pevsner, RCHM and the VCH. The schedule of listed bells was another common source for those churches with bells. It was uncommon for additional sources to have been consulted. In a small number of cases, the sources had not been completely referenced or information had not been fully added.

A small number of records referred to fieldwork that had been undertaken on site, and in these instances the relevant grey literature had been correctly referenced and information added. Church guidebooks were also referenced on occasion.

It was notable that the Nonconformist places of worship often only had one source referenced, and in a number of cases the source was either a local website or 'Cambs County Council Listed Buildings Database , ' which is currently difficult to access.

A very small proportion of buildings had images associated via LibraryLink, and a small number of records had associated websites, usually the parish website.

How comprehensive is the data?

The Cambridgeshire HER data for Places of Worship appears to be fairly comprehensive, with the vast majority of places of worship being recorded. As far as can be determined, all of the Listed Places of Worship have an associated monument record, with the exception of one, and the majority of churches sampled were covered by a Listed Building designation. Several of the college chapels of the University of Cambridge were covered by a general monument record for the college itself, and would probably benefit from having a separate record created.

It is notable that many churchyards are not properly recorded, either within the main church record or as a separate record, however this data is already held within the HER and therefore churchyard records could be enhanced with relatively minimal further research. The vast majority of churches have their dedications listed within the monument title. Due to the high level of data already collected and added to the HER it would therefore be beneficial to integrate data from other sources to maintain the HER's status as a repository for archaeological information for the county.

Are all Places of Worship covered by the Ecclesiastical Exemption recorded on the HER?

This information is not easy to find on the internet, and the lists that are available are not necessarily comprehensive. However, it is almost certain that the HER lacks information on some of the newer churches. For example, no church is listed in Cambourne, however a search of the internet provides details of a Methodist church, and a United Reformed Church which are in fact the same building.

A brief survey of a single parish, St Neots, revealed that churches from all denominations covered by the Ecclesiastical Exemption were recorded.

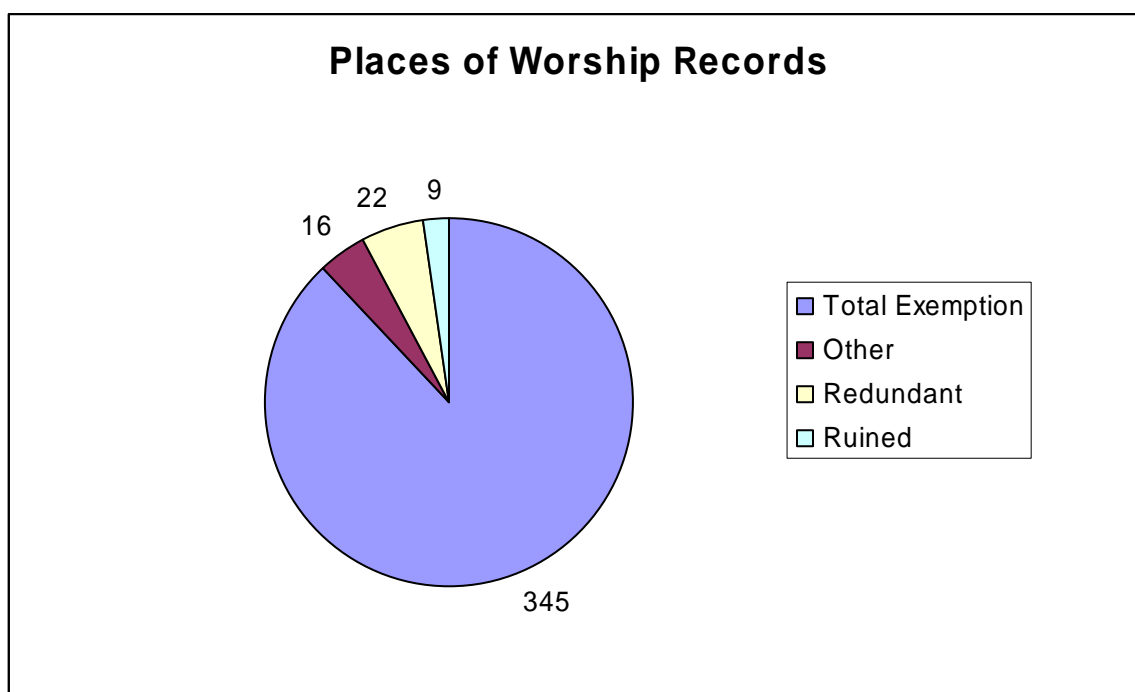
There is no need for a separate data standard as it is believed that the existing MIDAS standard for HERs is perfectly satisfactory and there is no significant requirement to create anything separately. The MIDAS guidance actually uses church derived exempla. The report has however identified weaknesses and omissions in the thesauri, but otherwise it is possible to create a MIDAS compliant church record, as demonstrated by the example provided.

This is a calculation of the total records in the HER and 345 records are covered by the Ecclesiastical Exemption.

Summary Totals for Cambridgeshire HER

Denomination	No. Records
Baptist Union	20
Catholic Church	7
Church of England	293
Methodist Church	11
United Reformed Church	14
TOTAL EXEMPTION	345
Other	16
Redundant	22
Ruined	9
TOTAL	392

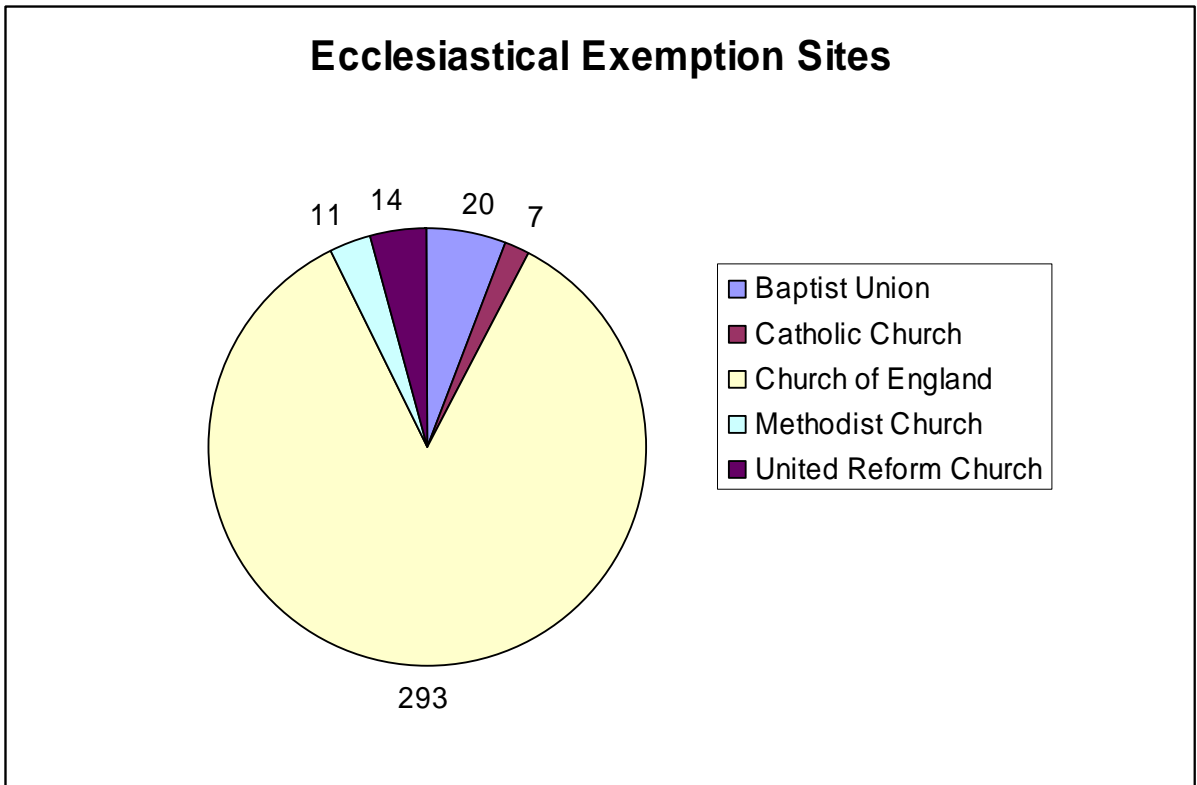
The other 47 records relate to places of worship that are fall into the categories of either non-listed, or multi denominational, or private chapels or non-exemption denominations.



Ruins are those which are either sites only or stabilised ruins. This is not comprehensive for the purposes of this survey.

Redundant places of worship are those that are still standing structures but have can have other uses including residential conversion, or vesting with organisations such as the Churches Conservation Trust. However, such places fall outside the Ecclesiastical Exemption as the buildings are not in regular use for worship.

As expected, the Church of England has the vast majority of these sites. Of the denominations, the only non-Anglican structure listed at higher than Grade II is the Catholic Our Lady and the English Martyrs, in Cambridge.



Part III: Analysis & Assessment

The information gathered across all five exemptions has allowed conclusions to be drawn in three key areas:

- Advice to applicants in preparing applications
- The processes followed by consent regimes
- Statement of Significance – content and review

Each has a differing aspect of contact with Historic Environment Records that needs to be considered.

Advice to applicants in preparing applications

This stage assesses the information available to and considered by applicants in determining the scope of the works being applied for. It covers the identification of limitation and material considerations, and reflects the information supplied.

In all exempt denominations the applicant is expected to consider the significance of the area/building under consideration. This usually covers the fabric and fittings directly impacted but on some sites there is a wider implication of archaeological remains.

Applicants are given advice and information to varying degrees across denominations. All denominations require a variation on statements of significance (see below) but have slightly differing requirements as to who produces the document and for whom. Some denominations require the Statement of Significance to inform the applicant's 'thought processes' for developing the proposal, others require it as part of the supporting information to the consent giving authority (similar to a secular Heritage Statement).

Generic guidance available to applicants covers most pertinent matters but a key area that is lacking is archaeological context and setting which, under PPS5, this is an especially relevant requirement. This arises where a place of worship overlies an earlier archaeological site. Early Church of England sites are sometimes deliberately constructed around prehistoric or Roman monuments, and contain other mediaeval and post-mediaeval structures, and later places of worship can quite easily be built over archaeological sites. This could have a significant impact on a proposal for a place of worship that would not necessarily be picked up by the processes in place.

The processes followed by consent regimes

This differs from the area above as it covers the information and resources available to those either determining consent themselves or providing recommendations to those who do.

All denominations include consultations with certain organisations, usually English Heritage, the Local Planning Authority and the Amenity Societies. The latter category covers all six national societies and some denominations take the view that they would only approach those directly concerned, and not (for example) the CBA.

There is an inherent risk in the approach taken with consulting Local Planning Authorities. Given this is exemption from Listed Building control, such consultations will most likely be with the conservation officers. Most planning authorities do not have archaeologists giving advice with their structure and in two-tier authorities, as in Cambridgeshire, it is likely that building/planning/conservation advice is issued at district level and archaeological provision is made at county level.

Archaeology within the planning process is undertaken in two main ways: direct consultation from planning officers or through monitoring of planning applications via 'weekly lists'. Consultations to the Local Planning Authority under the Ecclesiastical Exemption would, by definition, not appear on the weekly lists. Hence any consultation on archaeological issues would be dependent on a direct approach, something that in the era of online dissemination may not happen.

Definitions of Significance under the Secular and Ecclesiastical Systems

A key factor that has emerged in this review is the use and interpretation of significance. There are two current policy documents that offer definitions of significance: Planning Policy Statement 5: Planning for the Historic Environment (DCLG 2010) and Conservation Principles (English Heritage 2008.)

PPS5 is probably the most relevant given it defines the secular process that the Ecclesiastical Exemption is supposed to be an equivalence of. Policies HE6 & 7 are key here:

HE6.1	<i>Local planning authorities should require an applicant to provide a description of the significance of the heritage assets affected and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage asset and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset. As a minimum the relevant historic environment record should have been consulted and the heritage assets themselves should have been assessed using appropriate expertise where necessary given the application's impact. Where an application site includes, or is considered to have the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where desk-based research is insufficient to properly assess the interest, a field evaluation.</i>
HE6.2	<i>This information together with an assessment of the impact of the proposal should be set out in the application (within the design and access statement when this is required) as part of the explanation of the design concept. It should detail the sources that have been considered and the expertise that has been consulted</i>
HE6.3	<i>Local planning authorities should not validate applications where the extent of the impact of the proposal on the significance of any heritage assets affected cannot adequately be understood from the application and supporting documents.</i>

- HE7.1** *In decision-making local planning authorities should seek to identify and assess the particular significance of any element of the historic environment that may be affected by the relevant proposal (including by development affecting the setting of a heritage asset) taking account of:*
- (i) evidence provided with the application*
 - (ii) any designation records*
 - (iii) the historic environment record and similar sources of information*
 - (iv) the heritage assets themselves*
 - (v) the outcome of the usual consultations with interested parties; and*
 - (vi) where appropriate and when the need to understand the significance of the heritage asset demands it, expert advice (from in-house experts, experts available through agreement with other authorities, or consultants, and complemented as appropriate by advice from heritage amenity societies).*
- HE7.2** *In considering the impact of a proposal on any heritage asset, local planning authorities should take into account the particular nature of the significance of the heritage asset and the value that it holds for this and future generations. This understanding should be used by the local planning authority to avoid or minimize conflict between the heritage asset's conservation and any aspect of the proposals.*

This clearly states that assessments of significance should be a core consideration of any submission for works to a heritage asset, and also that the level of work involved should be appropriate to the proposals.

PPS5 defines significance as:

The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic

A thorough Statement of Significance should take into consideration all these aspects, drawing on varying sources of information to ensure it is comprehensive. It is worth noting however that the concept of significance does change, and things that may have been thought mundane in the past are now deemed significant. Keeping an archive of these documents relating to a single asset is a good way to record such changes.

Part of any Statement of Significance should be an assessment of the archaeological value, which can be seen as direct (the archaeological importance of the building) or indirect (the importance of the site with regard to previous or proximal archaeological information). An example of the first would be the mediaeval church with Saxon fabric, indicating the presence of the foundations of an earlier Saxon structure beneath the present one. An example of the second would be the discovery of Roman pottery in the grounds of the building where the site is adjacent to a Roman Road junction.

In the first case, the archaeological interest lies in the earlier phases of the church, and in the second the possible presence of Roman roadside activity. Processes previously and currently in use would not necessarily recognise the second one but should identify the first. Additionally, the correct identification of indirect archaeological interest would probably only be undertaken through the collection, interpretation and assessment of HER data from outside the churchyard. It should be recognised that to undertake this may be beyond the resources or capabilities of an applicant, and indeed may not necessarily be a level of assessment appropriate to the impact of the proposal.

It should also be emphasised that given the nature of applications to places of worship there is quite a narrow gap between levels of works that would have an archaeological impact and yet would not require planning permission. Should any proposal require planning permission, then PPS5 principles would be applied to the application process, so the local planning authorities archaeological advisers would be involved and appropriate mitigation implemented. However, it should also be noted that determination of Listed Building Consent under PPS5 can involve a requirement for archaeological recording.

There are not many development scenarios outside the Anglican Church where archaeological interest would be generated without planning permission and the processes adopted by the denominations do appear to recognise/reflect this. The situation is different for the Anglican Church due to the presence of mediaeval buildings and churchyards, and the fact that the Faculty process is all encompassing and is more than a simple equivalence process. However, such scenarios can occur, and even when planning permission is involved it is essential for any applicant to know at an early stage whether there is likely to be an archaeological interest in order to include mitigation in the development of the proposal, including if necessary the professional cost of fieldwork or other archaeological input. This will ensure that there are no unpleasant surprises later in the process but also has the added advantage in potentially highlighting an additional aspect for the Place of Worship that may help with raising the profile locally as a heritage asset.

CONSERVATION PRINCIPLES identifies the concept of heritage value to inform decision making regarding conservation and management. This stretches beyond the level of interest defined through designation, and includes how people perceive and use an asset (paragraphs 30 – 60). There are four values:

Evidential value	<i>Evidential value derives from the potential of a place to yield evidence about past human activity.</i>
Historical value	<i>Historical value derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative.</i>
Aesthetic value	<i>Aesthetic value derives from the ways in which people draw sensory and intellectual stimulation from a place.</i>
Communal value	<i>Communal value derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical (particularly associative) and</i>

aesthetic values, but tend to have additional and specific aspects.

Values then form an integral part of assessing significance, according to the following steps:

1. Understand the fabric and evolution of the place
2. Identify who values the place and why they do so
3. Relate identified heritage values to the fabric of the place
4. Consider the relative importance of those identified values
5. Consider the contribution of associated objects and collections
6. Consider the contribution made by setting and context
7. Compare the place with other places sharing similar values
8. Articulate the significance of the place

Again, current practices utilised by exempt denominations are potentially capable of recognising Historical, Aesthetic and Communal Values, but possibly less so with Evidential Value, especially where early phases of archaeological remains are present, often not associated with the current use as a Place of Worship.

The Setting of Heritage Assets is very pertinent to places of worship. Setting is described in PPS5 as:

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral

And in Conservation Principles as:

The surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape

English Heritage has recently issued a consultation document on setting and its determination, and it is expected that the final detailed version will assist with defining this. It may be helpful for the denominations to include specific guidance and case studies on defining the setting of a place of worship.

Statement of Significance – content and review

A core document appears to be the Anglican guidance for Statements of Significance. This has been adapted for use by the Methodist Church, whose document has in turn been adopted by the United Reformed Church. The Anglican guidance has been recently redrafted to be more comprehensive and to a certain degree more dependent on professional input and the extent to which this will be replicated by the others is uncertain. The Catholic Church in England & Wales does not issue guidance. The Baptist Union Corporation does have basic guidance but by having two documents covering conservation separately from mission does arguably introduce a level of simplicity for users.

The Anglican Church has arguably led the way in the introduction of Statements of Significance as a key element in the management of heritage assets. Statements of Significance have been used for nearly a decade and from their earliest form have required congregations to consider both the wider setting and archaeological importance of a place of worship. The recent revision of the template and guidance, and the adoption of Conservation Management Plans for truly exceptional places of worship, further reinforces this approach as both require professional input to a degree dependent on the significance of the building.

The main issue with Anglican Statements of Significance arises from consistency of content and application. The quality of the Statement of Significance does vary tremendously across dioceses, and even within a diocese, and often depends on the willingness and interest of a PCC member or local historian to be completed. Some PCCs do not recognise the conservation significance of a building, preferring instead to refer to the mission as being overriding. This is rare, but there is an issue with ensuring that Anglican Statements of Significance follow the spirit as well as the letter of the template and guidance that accompanies it.

A further issue is the interpretation of the word “significance” and the fact it covers a lot more than the architecture or archaeology of the building, and includes interiors, setting and also changes in perception. Some aspects of (for example) an interior may be considered far more significant today than they did several decades ago.

Additionally, there is the question of how to treat the churchyard, and whether it should be treated as a heritage asset apart from the church. Where a churchyard contains separately designated assets (tombs, crosses etc) these will be identified, but the treatment of the overall burial area is often left out. This is of especial relevance given the increased pressure on burial space currently being experienced, with an associated rise in the consideration of reordering churchyards to extend their use.

The Catholic Church of England & Wales does not require a formal Statement of Significance as part of its exemption procedure, but does expect an appreciation and understanding of the building. Given the high level of ‘reverence’ that the religious significance of the building attracts within the CCEW and the low level of interventions actually undertaken, most of which take place outside the building, then this is perhaps understandable. Another consequence of this is that issues of setting may not be fully presented.

The CCEW believes that its building stock is underlisted and the ‘Taking Stock’ campaign is a deliberate process to address this. Given the level of professional involvement in ‘Taking Stock’ the quality of this programme will be a very important source for the future. Since significance is not fully indicated by the level of designation, the importance of ‘Taking Stock’ cannot be understated. Equally, the importance of dissemination of the end product to take full advantage should be stressed.

There is little archaeological input seen within the processes utilised by the CCEW. It is expected that directly relevant archaeology will be addressed by the applicants and their advisers, but without guidance, there is little that will encourage applicants to consider indirectly relevant archaeology.

The Baptist Union Corporation is used here to refer to those elements of the Baptist Union that operate the Exemption. The equivalents of Statements of Significance used by the BUC are Statements of Justification. The BUC takes a very different approach to other denominations in that it requires two documents, one from the church and one from the professional adviser. The first is the logical argument set out by the users of the building as to why the change is required. In this regard it is not dissimilar to the Statement of Need produced by the Church of England.

The second document is of relevance here as it is the one produced by the professional advisor who should be fully aware of the requirements. The guidance produced by the BUC both for this and the covering document can clearly steer applicants and their advisers towards the relevant sources of information.

At present, the procedures of the BUC should probably encounter directly relevant archaeology but not necessarily indirect. Similarly archaeological setting issues may not be fully addressed.

The Methodist Church utilises the templates for Statements of Significance issued by the Church of England, with some modifications to suit the denomination. Hence similar issues with regard to setting and indirect archaeological impacts can be encountered. Whilst applicants are encouraged and expected to discover archaeological information about their sites, how this is used and interpreted can be called into question.

The United Reformed Church makes use of the guidance produced by the Methodist Church and also expects applicants to consider archaeological information as part of their supporting documentation. Again, whilst this would identify data directly relevant to a building it would not necessarily identify matters pertinent to setting and indirect impacts.

A summary table of the points of contact between archaeology and the exempt across the five denominations is below.

		Church of England	Catholic Church in England & Wales	Methodist Church	United Reformed Church	Baptist Union of Great Britain
Advice	Advice available to applicants on listed buildings	Y	Y	Y	Y	Y
Advice	Advice available to applicants on archaeology	Y				
Advice	Advice available to applicants on archaeological setting	Y				
Advice	Advice Locally	Y	Y		Y	
Advice	Advice Nationally	Y	Y	Y		Y
Advice	Policy on Archaeology	Y	Y			
Advice	LPA Consulted	Y	Y	Y	Y	Y
Consent	Advice available to decision makers on archaeology	Y	if req'd	Y		
Consent	Review of Significance at Closure	Y	Y	Sometimes	Sometimes	
Consent	Archaeological Conditions Used	Y	Y	Y	Y	Y
Statements of Significance	Statements of Significance Produced	Y	Y	Y	Y	Y
Statements of Significance	Guidance on Statements of Significance	Y		Y	Y	Y
Statements of Significance	Archaeological Review of Statement of Significance	Y				

Part IV: Options and Outcomes

This report seeks to ascertain how HERs can more fully operate and interact with the Ecclesiastical Exemption and the denominational processes arising from it. HERs are already firmly established as part of the secular planning process with regards to planning applications, but it is recognised that interaction with the listed buildings process may not be at such a level.

Ecclesiastical Exemption is part of the listed buildings process, and applies only to listed building consent. According to the current Guidance, it exists because:

“in order to survive and to continue to serve their local communities, listed churches might need to adapt to meet changing liturgical preferences, and to meet the needs of today’s worshippers and other users.”

This is recognition that the mission needs of a place of worship place unique demands on the curation/stewardship of these designated heritage assets. It is certainly true that with some churches, there is a continuity of consistent use that stretches back nearly 1400 years and anyone who works with and/or cares for churches can see immediately that such continuity has only been possible by adapting them to meet changing demands of mission. Without this change, the buildings would undoubtedly have been lost.

Hence there may be a perceived conflict between mission and the secular requirements to protected heritage value through conservation practices. The Exemption exists to address this by permitting decisions regarding the ongoing stewardship of these designated assets to be made by those denominations. This allows for detailed input from both mission and conservation perspectives, but the order requires that the processes adopted by the denominations are EQUIVALENT to the secular process in their regard for heritage.

This study is not intended to review the efficacy of the exemption or to offer comments on its purpose or function. It is intended to consider how Historic Environment Records can attain a level of involvement within the Exemption that is equivalent to that within the secular system.

It sought to address three original questions:

1. What historic environment information does an exempt denomination require to meet its obligations?
2. How HERs meet that requirement and what additional enhancement would be required to do so?
3. What information generated under the processes of the exemption can be usefully added to HERs?

A fourth was subsequently added:

4. What processes for redundancy are in operation and to what extent 'heritage significance' plays into them?

To address each one in turn.

What historic environment information does an exempt denomination require to meet its obligations?

This falls into the following categories:

1) Information about the building and its contents AND Information on any churchyard/burial ground

These can be considered as 'direct' information. This is HER data about the asset itself, such as architectural descriptions, listings, surveys, registers of bells, glass, NADFAS inventories, antiquarian records etc. Cambridgeshire HER has located a previously unknown resource at the National Monuments Record in the form of the unpublished notes and surveys created by Inspectors with the RCHM in the 1950s who were working to compile further volumes of the RCHM Inventory for the county.

Based on these, an updated record for a place of worship (Holy Trinity Church, Cambridge) is below.

2) Significance of the asset

Assessing significance entails considering various areas of interest and different values. The presence of registers of designated assets, whether government led (such as listing or scheduling) or specific (such as the National Pipe Organ Register) automatically confers a level of significance in some areas, but it is far more complicated when dealing with group assemblages such as whole interiors, or collections of pews, or when comparing the quality of objects by the same person across different sites. For example, to be able to assess the significance of one set of Kempe stained glass against another is a highly specialist judgement to make.

Archaeologically-driven assessments of significance do exist beyond the register of designated assets. Cambridgeshire HER has records of the assessments undertaken by the Monument Protection Programme undertaken in the mid-1990s, where categories of monuments by type (e.g. barrows, or mediaeval moats) were assessed against the following criteria:

1. Documentation (archaeological)
2. Documentation (historical)
3. Group value (association)
4. Group value (clustering)
5. Survival
6. Diversity (features)
7. Potential
8. Amenity value

These are all scored on a range of 0-3, and the higher the score the greater the importance of the monument; above a certain score the monument was deemed to be of schedulable quality. These records are accessible through the Cambridgeshire HER but no work was undertaken on active places of worship

3) Details of archaeological potential of the site

This is the current core function of the HER within the secular planning process. A planning (or development control) archaeologist will as part of their routine workload assess the impacts of a planning application against the archaeological importance of a site. This importance is determined by a level of professional judgement based on an assessment of the known archaeological data contained with the HER to determine the archaeological potential.

A key element is making use of peripheral or background data to add depth to a particular record. To use an example, HERs will often contain data that records individual finds of Roman pottery in a set location. A few sherds of pottery do not necessarily indicate a significant level of archaeological importance but the interpretation of this site can be very different according to the nature and context of the find.

Should the findspot be of large, unabraded sherds and lie in close proximity to Roman Road, then finds of pottery could indicate the presence of a settlement or other roadside activity. Small abraded sherds by a road could indicate a midden, which in turn raises the possibility of a settlement close by. Alternatively, should the findspot be in a rural setting then large sherds could again indicate a settlement whereas small, abraded sherds could be as a result of manuring practices across a field system. In each case the significance of the HER records varies according to the interpretation of its context, and it is this skill that influences the decisions made as part of the secular planning process. Denominations operating under the Ecclesiastical Exemption should therefore be demonstrating equivalence to this assessment.

This is where the Church of England has an advantage with its network of Diocesan Archaeological Advisors, Guidance Notes, the Church Buildings Council (members and staff) and a greater familiarity in dealing with the archaeological implications of proposed works to places of worship. No other denomination has 'dedicated' archaeological advice at a local level (diocesan or equivalent), for although the Methodists and Baptist Union do have archaeological advice on their committees, these operate at national level and it is not reasonable to expect those individuals to possess that level of knowledge.

However, archaeological potential of a SITE rather than a BUILDING also has relevance to non-listed places of worship, both as an early warning of possible archaeological requirements on any application for planning consent, and also for determining impacts on any future use of the land. This means that for denominations whose 'heritage' advisory committees only concentrate on designated assets, there is a need to ensure that other ecclesiastical authorities are made aware, perhaps through an addition to a wider property asset register.

4) Setting

Under current guidance and practice, the definition of setting is usually determined on an individual basis. It is as difficult for a HER to provide information on the setting of a heritage asset covered by the Exemption as it would be for one operating under the secular system. Pending the issuing and adoption of English Heritage Guidance

on setting this must remain in abeyance, but any future guidance issued by or for Exempt denominations must reflect any proposed role for HERs.

However, given the complex nature of setting it is suggested that any guidance should include specific reference to places of worship to ensure that the denominations are made aware of the issues to be considered.

How HERs meet that requirement and what additional enhancement would be required to do so?

Assuming that all Places of Worship are actually on the HER, especially listed ones, then the level of information contained in the record varies enormously. The assessment of Cambridge HER records outline above, illustrates many shortfalls in the data.

There is a standard 'portfolio' of sources used for places of worship that consists of generally available, published information. These include:

- Pevsner Buildings of England Series (2 volumes for Cambridgeshire)
- Royal Commission on Historic Monuments in England Volumes (3 areas in Cambridgeshire)
- Listing Descriptions
- Church History Booklets
- Archaeological Reports ("Grey Literature")
- Churchyard Surveys

Additional sources identified include:

- NADFAS (National Association of Decorative & Fine Arts Societies) inventories: a list of these held for the county is in Appendix I. These are detailed records of the fixtures and fittings of Places of Worship compiled by volunteer groups.
- Unpublished notes on site visits by RCHM Inspectors: the RCHM intended to publish further volumes on Cambridgeshire but this was not done. However RCHM staff did undertake field visits for the county. The archives from these, comprising notebooks (often handwritten), drawings and photographs are held by the National Monuments Record.

Assessment of these sources to create the sample record in Appendix I has shown the following:

1. Fixtures and fittings have proved difficult to record, due to the current limits of the HER thesaurus. For example, at Holy Trinity a carved stone effigy was discovered. This could be recorded as a monument-effigy or Find-carved stone. Many of the fixtures and fittings recorded by NADFAS do not have a thesaurus term, for example wall tablets and floor slabs. 'Bell' also needs to be added as a component, as it is currently only listed as a find type. There is also currently no way of recording fixtures that have been removed.
2. NADFAS records are excellent, but the HER would need a copy to have the information to hand. This could be in hard copy or digital format and would require direct communication with NADFAS for updates new sites.

3. Less data was collected from the RCHME archive where the relevant volume has already been published, as the majority of the written information is included. However, the visit notes included sketched drawings or architectural features such as arches and windows, rubbings of the hallmarked silver and contained a detailed list of all monuments and floor slabs, not recorded in full in the published volume. There were also a number of new photographs, again not included in the published volume and therefore it would be beneficially to have copies of the RCHME archive for all church sites where they exist.
4. Where the RCHM notes have not been published, then the notes are invaluable.
5. Churches need to be indexed correctly by denomination and type. For example, 'Anglican church' should be used instead of 'church'. Churches where the denomination is unknown or the church is out of use can be listed simply as 'church'. This is already possible within the existing thesaurus. Additionally, the monument term 'parish church' also exists, so two monument types can be attached to a record showing the denomination and the status of the Place of Worship.

It is therefore theoretically possible to create a detailed and comprehensive HER record for a Place of Worship based on publicised and unpublished sources that can then be enhanced through regular cross checking of Statements of Significance (see below). However, the enhancement trials undertaken for this project have shown that it will require an average of one person day per Place of Worship. Cambridgeshire has 350 Places of Worship, so in excess of 18 months worth of enhancement time would need to be devoted to this task. Few HERS would consider this a priority.

Additionally, one respondent raised the point that a parish that is sufficiently informed to access the HER in the first place will most likely already have read the majority of the sources used to create the record. Hence the return on the investment of HER resources may not be reasonable.

It is also not necessarily desirable to fully make available something like a NADFAS inventory given it goes into detail regarding works of art and church plate. Places of Worship are increasingly kept open which makes them potential targets for theft and vandalism, so it would not be sensible to create easier access to such information.

It is more realistic to make fuller use of the HER as an Index rather than a definitive source. Places of Worship have a wide variety of possible sources, including some that parishes or similar may not necessarily consider or know about. In this scenario, anyone accessing the HER for a Place of Worship would immediately be given a list of available resources and details of how to access them. This level of enhancement is a more realistic option.

In terms of 'indirect' archaeological information, then the level of data held should not be any different from the normal daily activities of the HER. The question arising is to determine the best way to ensure that the denomination is aware of this sensitivity, especially given the apparent current lack of awareness. This matter is probably of more relevance to non-Anglican denominations.

Given the dynamic and evolving nature of HERs, it would be a labour intensive operation to supply and update archaeological information to Exempt denominations.

Again a more realistic option would be to ensure that the denominations are made aware just of the fact that the site is archaeologically sensitive and reasons why this is the case, with a standing advice that any application or consultation should ensure that the local authority archaeologists and HER are approached for advice. At this stage, detailed HER data on the site and surrounding area can be supplied.

Most denominations maintain a property asset register or database, and adding an additional field that records this simple component is the most effective way of doing so. The Methodist Church, for example, maintains a property database that could be adapted to contain a 'flag' for archaeological significance. Given that archaeological data is always being added to HERs this would also ensure that regular contact was maintained between the denominations and HERs. It would require an initial assessment by the HER of (non-Anglican) sites to determine their sensitivity. An example of Catholic places of worship (designated and non-designated) is in Appendix 1.

A final element of the HER record is the designation status of the site. At present, if a place of worship is a designated heritage asset (listed or scheduled), the Cambridgeshire HER records this as a separate record (DCB****). Given the incomplete overlap between designated places of worship and the scope of the exemption, it is sensible to add a second level of designation to the monument record of 'Ecclesiastical Exemption' that will ensure that the HER and those who make use of it are fully aware of a building's specific status. This is quite feasible within the HBSMR system.

A further potential benefit of the HER lies in its ability to record consents under the Designations field. The normal use for this function is to maintain a record of consents for works on Scheduled Monuments, but there is no reason that this could not be used to record consents such as faculties given under the Exemption. Each denomination is required to maintain a list of granted consents, and were these to be provided to the HER then it would be relatively simple task to add them to the record.

What information generated under the processes of the exemption can be usefully added to HERs?

Each exempt denomination produces reports and other documentation as part of their equivalence procedures. There has been a universal interest in making these available to HERs, although with a requirement to withhold some information such as regarding portable, valuable items (see above). Should these be routinely lodged in the HER then this allows for the regular enhancement of the HER record. It also ensures that a copy of the Statement is held outside the denomination which can act as a 'back-up' copy.

The documentation produced by the denominations that would be of most use for HERs is as follows:

Denomination	Product
Baptist Union	Statement of Justification from the Professional Advisor
Catholic Church	'Taking Stock' survey
Church of England	Statement of Significance or Conservation Management Plan Pastoral Measure Report

Denomination	Product
	Critical Information Summary
Methodist Church	Statement of Significance
United Reformed Church	Statement of Significance

A fuller discussion of the approaches taken to Statements of Significance is above, and there is no doubt that the quality, focus and coverage of these documents varies across all denominations as well as within them. Where produced to the requested standard they are useful documents.

What processes for redundancy are in operation and to what extent 'heritage significance' plays into them?

Denominations are increasingly seeing more buildings become redundant and thus falling outside the exemption. This creates a situation where a historic building suddenly falls under secular control but without a portfolio or case file of previous works that accompany and inform change on a secular structure, a concern noted by the amenity society consulted.

Hence ensuring that the heritage information and the archives of past casework held on these sites are accurate becomes even more important when such buildings pass back to secular control. Denominations do have established processes to manage this that include an up to date assessment of the significance of the building, but the data generated from these processes in the past have rarely been deposited with HERs.

Closure of Church of England buildings is centrally recorded, and research in 2010 has shown that the rate of closure for those of higher listing (i.e. Grade I or II*) has reduced in recent years but whether this is as a result of the higher heritage value of the building is less clear. There is anecdotal evidence within the Church of England that making congregations aware of the heritage significance of their building can help re-engage local people and stave off closure, but this has not been systematically demonstrated. Unfortunately similar data does not exist for other denominations.

The inclusion of procedures for closing Places of Worship was a subsequent addition to the project that arose from initial discussions with stakeholders. Much of the procedure for closing buildings derives from differences of ownership of the sites, and the extent to which formal documentation exists relating to the initial establishment of the place of worship. Baptist Churches, for example, will have a trust deed on its foundation whereas with many Anglican churches there are sometimes questions as to who actually owns them.

Only the Church of England has a systematic assessment of the full heritage potential of redundant places of worship. This originates with the Pastoral Measure process, where the conservation or heritage value is made prominent, initially to the congregation and diocese in presenting the value of their building. Subsequently, a more detailed and rigorous assessment is undertaken and a report presented to the Church Commissioners to inform the deliberations over possible future uses.

The Catholic Church in England & Wales and the Methodist Church both have a mechanism by which the significance of a building can be included in the

deliberations about a closed church, but neither process is as comprehensive nor as systematic as that used by the Church of England. Non-Anglican denominations do recognise this but it should be stated that their building stock is neither as large nor as highly designated as that of the Church of England.

Part V: Recommendations

The survey and assessment has identified several options for improving the interaction between exempt denominations and Historic Environment Records. These can be divided into recommendations for HERs, recommendations for denominations, and recommendations for English Heritage. Furthermore, these can be defined as short term and long term objectives.

It is useful to repeat the limitations of this survey in that it is based on one county with a single HER and five denominations. While this can be indicative of the wider picture, each area will have its own processes and other factors to consider.

Recommendations for Historic Environment Records

The HER must be seen to add value to the exemption otherwise it will not be made regular use of, regardless of the guidance. Whilst in the long term HERs should create, maintain and deliver the most comprehensive and updated record available, this may not be realistic in the short term given the shortfall in quality of the existing records.

A more deliverable objective would be to ensure that each place of worship is noted on the HER, and as many sources are identified and indexed. This at least will give the enquirer from a denomination an indication of the full range of information available, and by creating a separate designation record the HER can record ongoing changes through listing faculties.

HERs are of course critical to determining the significance and potential of the wider site and context. This information should be routinely updated and made available. In two tier authorities, the archaeological service should ensure that appropriate consultations are passed for relevant comment.

Short Term

- Ensure that all Places of Worship have basic HER Monument Records to include
 - A monument type that identifies the relevant denomination
 - A designation record where the building is covered by the exemption including faculties granted
 - All known sources
 - Clarify procedure for ruined or redundant churches.
 - Include information regarding denomination in either the monument record or the separate designation. This is especially important in cases where the church has changed denomination or covers more than one denomination.
 - Ensure information from the monument description is indexed correctly in the monument tree for each record.
 - Use the information already contained within the HER to create and enhance churchyard records.
 - Separate out college chapel from the main college records
- Ensure that all known burial grounds are recorded on the HER and linked to the place of worship.
- Identify published and unpublished reference material and index records to source materials such as RCHM archives and the 'Taking Stock' publications

- Assess archaeological potential of places of worship locations in order to advise of indirect impacts arising from archaeology
- Ensure that local denominations have relevant contact details

Long Term

- Create full HER records with indexed components and summary descriptions of sources
- Build reference library of relevant denomination-produced reports
- Consider assessments of significance for heritage assets

Recommendations for Exempt Denominations

The role and extent of HERs does not appear to be fully known by the exempt denominations. The new guidance and changes in the secular planning system emphasise wider issues of setting and context, which represents a change the extent of which may not be fully appreciated. Routinely accessing the HER should assist with this.

In terms of detailed information about individual places of worship, it is still likely that the denominations themselves will have more information about the building and contents, but not the archaeological background. It is recommended that guidance is amended to require applicants and/or their agents to request archaeological input to relevant cases, which would usually be those that involve any ground disturbance.

'Ownership' of the relationship between the denominations and HERs by the former is best achieved at the level of the advisory provision under the denominations, such as Diocesan Advisory Committees, Listed Building Advisory Committees and Historic Churches Committees. This is probably the most efficient point of contact to ensure consistency. Denominations could look at their own internal systems in order to identify means of readily marking a site that has archaeological potential.

It is equally recommended to ensure that the full benefits of the work undertaken under the processes of the exemption are fully realised. This would be best achieved by the wider dissemination of reports and documentation that either assess or increase heritage value and awareness of the place of worship. Such reports are often created by or have input from heritage professionals with detailed specialist understanding of the structures under consideration and these should be more widely disseminated.

Many of the recommendations for the denominations can be achieved through the alteration of existing guidance and raising general awareness of the issues.

Short Term

- Make contact with local archaeologists
- Request assessment of archaeological potential of sites and mark on records, Ensure appropriate local church members are aware of extra sensitive sites and have the appropriate contact details
- Ensure that all reports arising from recording/mitigation work are passed to HERs
- Encourage the transfer of documents that assess heritage value to HERs

- Ensure that guidance notes encourage local members to make contact with HERs when considering works, especially if sites have indirect significance

Long Term

- Build up records of heritage assets
- Ensure records on buildings are carefully curated after closure for further consultation

Recommendations for English Heritage

English Heritage is the national lead body on heritage matters and the government's advisers on archaeology. It is a statutory consultee for exempt denominations, and is the obvious body to issue advice and guidance to secular and ecclesiastical bodies through initiatives such as HELM and Heritage at Risk. It is also best placed to ensure that concerns over the process can be addressed.

- Undertake briefing or training sessions for denominations and HERs to demonstrate the benefits and potential to both of closer working relationships, perhaps similar to other programmes delivered by the HELM programme on Places of Worship
- Issue Case Studies to highlight benefits of close working and pitfalls of not doing so
- Issue Guidance for HERs and Exempt Denominations
- Review standard thesauri to ensure appropriate components and types are available
- Ensure all guidance notes relating to PPS5 etc are worded to acknowledge the unique requirements of Places of Worship and where necessary (e.g. with setting) offer specific advice.

This work has looked briefly at the procedures for closing places of worship, which is an area that probably has the greatest potential for inadvertent loss of heritage significance. This can be due to a variety of reasons including:

- Lack of understanding of the purely heritage value of an asset
- Conflicting priorities of disposal processes
- Lack of maintenance in a place of worship that is moving towards closure
- A desire to be divested of an asset that no longer provides value to mission
- Lack of information regarding previous works
- The nature of 'transition' from use to closure, and exemption to secular control

English Heritage is probably best placed to oversee and guide the various closure processes, and given that this requires a transition from the exemption to secular control, it would be appropriate to do so.

Appendix I: Cambridgeshire HER Data

Creating an ideal HER record for a place of worship

Holy Trinity, Cambridge (MCB6012) was selected as a trial record for enhancement. The existing sources were reviewed and further information was added from the majority of sources. The National Association of Decorative and Fine Arts Societies [NADFAS] inventory for the church was reviewed in the Cambridge Record Office, and a large amount of data was collected. A copy of the RCHME archive was requested from the National Monuments Record, and consisted of sets of notes from two visits to the site in 1941 and 1946.

A new record for the churchyard was created, as this had not been recorded previously (MCB19391.) These records are below.

Cambridgeshire County Council Historic Environment Record

17/03/2011

Holy Trinity Church, Cambridge

HER Number	Site Name	Record Type
04971	Holy Trinity Church, Cambridge	Building

Classification**Monument Types and Dates**

		Building
Niche	16th century - 1501 AD to 1600 AD	
Effigy	16th century to 17th century - 1501 AD to 1700 AD	Clunch, Moved Structure
Altar	16th century to 17th century - 1501 AD to 1700 AD	Documentary Evidence
Cross	Medieval - 1066 AD? to 1539 AD?	Documentary Evidence
Gallery (Ecclesiastical)	19th century - 1801 AD to 1900 AD	
Wall Monument	19th century - 1801 AD to 1900 AD	Documentary Evidence
Anglican Church	Medieval to 19th century - 1066 AD to 1900 AD	Extant Building, Flint, Stone
Spire	20th century - 1901 AD	
Transept	15th century - 1401 AD to 1500 AD	
Nave	12th century to 19th century - 1101 AD to 1900 AD	
Vestry	19th century - 1801 AD to 1900 AD	
Aisle	14th century to 16th century - 1301 AD to 1600 AD	
Chancel	19th century - 1801 AD to 1900 AD	
Tower	14th century - 1301 AD to 1400 AD	
Stained Glass	19th century - 1855 AD	

Monument Status and Scores**Associated Legal Designations**

DCB75	Active	Listed Building	47611	Church of the Holy Trinity
94				

Other Statuses and Cross-References

SHINE Candidate (No)	Active
Original Record Number - 04971	Active

Ratings and Scorings - None recorded**Location**

National Grid Reference	TL 4498 5853
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Administrative Areas

Civil Parish	Cambridge, Cambridgeshire
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Address/Historic Names - None recorded**Description**

1. In the latter half of the 12th century, this church, in common with some others in the town, was burnt down in an extensive fire, which raged through the town in the year 1174. This statement is so far borne out by the structure itself, for the oldest part of the church, the west bell-tower is evidently 13th or at latest 14th century work. The pier arches on the south side of the nave also belong to the Decorated period, and as the original chancel which was taken down in 1833 was also in this style, it seems probable that when the church was rebuilt after the fire it consisted simply of a tower, nave and chancel. The south aisle was added in the 16th century and the two existing transepts altered to allow for the erection of side altars, at least four of which existed in the years 1505-1550. In 1879 the north transept gallery was removed, which revealed a stone figure of a Bishop with mitre and crozier, believed to have been associated with one of the side altars. The figure may possibly represent St Erasmus. The figure was discovered in a niche in the centre window, partly blocked by a monument to Sir Robert Tabor, who died in 1681. The niche was six feet from the floor and has traces of elaborate decoration. It seems probable that the mutilation inflicted on the figure and the surmounting canopy (fragments of which were also noted in the niche) was the work of the Parliamentary Commissioner, William Dowsing, in 1643.

4. The first Holy Trinity was destroyed by fire in 1174. The lower parts of the present Tower may be 13th century. The nave arcades are 14th century. Transepts and clerestorey were added in the later 15th century. The chancel was rebuilt in 1834 and redecorated by Bodley in 1885. The spire was rebuilt in 1901. Holy Trinity is famous for its connection with the Evangelical Movement.

The gallery in the south transept was built in 1836 by Charles Simeon.

Stained glass: In N and S transepts, 1855, by Constable.

Chalice with Cover Paten: One C16, inscribed 1569, gilt; one C17, 1622 - 1623, gilt, maker's mark TF in monogram, in a shield.

Almsdish: C17, 1631 - 1632, maker's mark CB in monogram, in a shield.

5. The west wall of Holy Trinity church with its facing of flint pebbles is thought to be 12th century work. The remainder of the church is 14th century with later additions. The organ chamber was added in 1885, and the south-west vector is modern.

Fittings:

Bells: Five and Sanctus. 1st, 2nd, 3rd and 4th by Thomas Newman, 1705; 5th by Thomas Newman, with names of churchwardens, 1705; Sanctus not hung.

Brass-indent: In south aisle, of small figure with inscription plate.

Chest: In nave, of wood covered with sheet-iron, with flat lid, handles and two locks, 16th century.

Consecration cross: In North aisle on North wall, painted in red and black, perhaps medieval

The effigy of the Bishop is now in the Museum of Archaeology and Anthropology. The font is located in the churchyard.

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- (8) Microfilm: Cole Parochial Antiquities.
- (9) Bibliographic reference: Monumental Inscriptions. CRO, Monumental Inscriptions, MS at the Society of Genealogists
- (10) Unpublished report: Dickens, A. 1999. Archaeological Observation on Cable Laying at Church Walk, Cambridge (TL 450 585)s. Cambridge Archaeological Unit Report 300
- (11) Article in serial: Chainey, G. 1990. The Lost Stained Glass of Cambridge, PCAS 79. , pp. 70-81

Associated Finds

Find Types and Dates

FCB2912 CHALICE (16th century - 1501 AD to 1600 AD)
 FCB2913 VESSEL (Post Medieval - 1540 AD to 1900 AD)
 FCB20530 CHALICE (17th century - 1601 AD to 1700 AD)
 FCB20532 CHEST (16th century - 1501 AD to 1600 AD)
 FCB20534 BRASS

Object Material

IRON, WOOD
 BRASS

Associated Events/Activities

ECB1592 Observations during pipe laying, Church Walk, Cambridge, 1999 (Event - Intervention)

Associated Individuals/Organisations - None recorded

HER Number	Site Name	Record Type
MCB19391	Churchyard of Holy Trinity, Cambridge	Monument

Classification**Monument Types and Dates**

Churchyard 12th century to Modern - 1101 AD? to 2050 AD

Font 14th century to 15th century - 1301 AD to 1500 AD

Railings 19th century - 1801 AD to 1900 AD

Gate 19th century - 1801 AD to 1900 AD

BuildingDocumentary Evidence,
Extant StructureDocumentary Evidence,
Extant Structure

Cast Iron, Extant Structure

Cast Iron, Extant Structure

Monument Status and Scores**Associated Legal Designations**

DCB73	Active	Listed Building	47612	Railings and Gates at the Church of the Holy Trinity
24				

Other Statuses and Cross-References - None recorded**Ratings and Scorings - None recorded****Location****National Grid Reference** TL 4499 5852**Administrative Areas**

Ward Market, Cambridge City

Address/Historic Names - None recorded**Description**

1. The font is located in the churchyard, and comprises an octagonal bowl with moulded under edge, plain stem and chamfered base. It dates from the 14th or 15th century and is worn and patched. See PRN 04971 for Holy Trinity Church

2. A watching brief was carried out on land adjacent to the graveyard during the laying of cables, and revealed a

Sources

- (1) Bibliographic reference: RCHM 1959. An Inventory of the Historic Monuments in the City of Cambridge. Volume II. London: HMSO, p. 259
- (2) Unpublished report: Dickens, A. 1999. Archaeological Observation on Cable Laying at Church Walk, Cambridge (TL 450 585)s. Cambridge Archaeological Unit Report 300

Associated Finds**Find Types and Dates**

FCB20535 HUMAN REMAINS

Object Material

BONE

Associated Events/Activities

ECB1592 Observations during pipe laying, Church Walk, Cambridge, 1999 (Event - Intervention)

Associated Individuals/Organisations - None recorded

Archaeological Significance of the Catholic Places of Worship in Cambridgeshire

This is a sample assessment of a denomination's stock of places of worship in Cambridgeshire. The assessment is based on the Cambridgeshire HER as at January 2011, and a statement of both potential and significance of the sites as at that date is provided.

Bar Hill, Cambs. Church Centre

This a multi-faith centre and there is no current information on the HER about any archaeological potential on this site.

*Potential: Low
Significance: Local*

Buckden, Huntingdon, Cambs. St Hugh of Lincoln

This site is located within Buckden Towers Scheduled Monument (SM CB112). The scheduling excludes standing buildings but includes the ground beneath them, so any disturbance to the grounds here would require Scheduled Monument Consent. Additionally, any proposed works would need to take into account the setting of the wider monument.

*Potential: High
Significance: National*

Cambourne, Cambs Church Centre

This a multi-faith centre. This location was excavated as part of the Cambourne new town fieldwork in the 1990s, so no archaeological remains will be present.

*Potential: None
Significance: Local*

Cambridge, Cambs St. Laurence

Built in 1958. There is no current information on the HER about the archaeological potential of this site.

*Potential: Low
Significance: Local*

Cambridge, Cambs Blackfriars, Dominican Priory of St Michael

This site is close to St Edmunds College and adjacent to the Roman town of Cambridge, called Duroliponte (HER ref. 05239) and as such is of high sensitivity. The road to Godmanchester is marked by the Huntingdon Road and the line of the walls follows the current Mount Pleasant.

There have been multiple excavations in the surrounding area, both immediately adjacent and also closer to the town. These have located Roman buildings, remains, field boundaries, burials and evidence of the road itself together with evidence of the Iron Age precursor to the Roman town that is believed to have included this area.

In the mediaeval period, this area was used for agricultural purposes as evidenced by ridge and furrow remains (HER ref. MCB15886) before being used for orchards and/or a plant nursery.

Potential: High

Significance: Regional

Cambridge, Cambs Our Lady & the English Martyrs

Built 1887-90 and listed Grade II*. The site is located alongside Worsted Street Roman Road, which was the main road from Cambridge towards Colchester. Although it lies outside the Roman town, archaeological excavation in the area at Union Road (HER ref. CB15464) found remains associated with Roman farming activities. The road itself is believed to lie slightly to the west of the current Hills Road so may pass close to this site. Roman Roads outside towns attracted various activities along their lengths, including cemeteries.

Other remains in the area include a Palaeolithic flint (HER ref. 05013) now in the Sedgwick museum and reported to be from the OLEM site, but this may be residual. In the mediaeval period this area formed part of the East Fields of Cambridge. The line of Lensfield Road marks the defensive bank and ditch (HER ref. MCB17288) dug during the English Civil War as part of the defences of Cambridge.

Potential: Medium

Significance: Local/Regional

Cambridge, Cambs St Edmund's College

Built 1915-16 and listed Grade II. This site lies immediately adjacent to the Roman town of Cambridge, called Duroliponte (HER ref. 05239) and as such is of high sensitivity. The road to Godmanchester is marked by the Huntingdon Road and the line of the walls follows the current Mount Pleasant. There have been multiple excavations in the grounds of the college and in the surrounding area, both immediately adjacent and also closer to the town. These have located Roman buildings, remains, field boundaries, burials and evidence of the road itself. Roman remains and burials have been found immediately adjacent to the chapel (HER refs. MCB15881 and MCB 16299.)

The Iron Age precursor to the Roman town is believed to have included this area and excavations in the college grounds have located pits from this date (HER ref. MCB17461).

In the mediaeval period, this area was used for agricultural purposes as evidenced by ridge and furrow remains (HER ref. MCB15886) before being used for orchards and/or a plant nursery.

Potential: High

Significance: Regional

Cambridge, Cambs St Vincent de Paul

Built in the 1920s using corrugated iron, it was originally located next to the Catholic church in Cambridge, then moved to Chesterton and later to the present site in Cherry Hinton. There is no current information on the HER about the archaeological potential of this site, but the surrounding area has extensive remains of Iron Age and Roman settlement.

*Potential: Medium
Significance: Local*

Cambridge, Cambs St. Philip Howard

Built in 1978. There is no current information on the HER about the archaeological potential of this site.

*Potential: Low
Significance: Local*

Ely, Cambs. St Etheldreda

This church was built in 1891. The location lies in the mediaeval town of Ely and between the Anglo-Saxon monastery and associated settlement. Egremont Street is recorded as 'Akermanstrete' in mediaeval documents and excavations close by at 3 Lynn Road have located significant structural and other remains from the mediaeval period (HER ref. CB15020). Late Saxon and mediaeval activity was also located on Chapel Street (HER ref. CB15532). Saxon and mediaeval remains can be anticipated.

*Potential: Medium
Significance: Local/Regional*

Huntingdon, Cambs. St Michael the Archangel

Built in 1901. There is no current information on the HER about the archaeological potential of this site, although the Cambridgeshire Extensive Urban Survey assessment of Huntingdon records it as lying beyond the mediaeval urban core in an area of post-mediaeval expansion.

*Potential: Low
Significance: Local*

Kirtling, Cambs (NB. The CCEW website lists this as Suffolk) Our Lady Immaculate & St Philip Neri

Built in 1877 to replace an 1871 corrugated iron structure and listed Grade II. This site lies within the one of the three areas of the Scheduled Monument of Kirtling Towers (SM13608). The church lies on the western arm of the moat, which is the largest in Cambridgeshire and has its origins as a royal centre in the late Saxon period. The recently revised scheduling notice summarises the site as:

“The Kirtling Tower site is a large well-preserved and complex monument, reflecting the high status of the site in the Tudor period. It exhibits a diverse range of features including the rare survival of earthwork remains of an ornamental garden. Importantly, it is known to lie on the site of a Saxon Castle, archaeological remains of which are likely to survive beneath the present site.”

The scheduling excludes standing buildings but includes the ground beneath them, so any disturbance to the grounds here would require Scheduled Monument Consent. Additionally, any proposed works would need to take into account the setting of the wider monument.

Potential: High

Significance: National

March, Cambs. Our Lady of Good Counsel & St Peter

Built in 1912 and rebuilt in 1953. There is no current information on the HER about the archaeological potential of this site, although the Cambridgeshire Extensive Urban Survey assessment of March records it as lying outside the mediaeval urban core in an area of urban expansion associated with the introduction of the railways.

Potential: Low

Significance: Local

Papworth Everard, Cambs. Closed Church

Built in 1950 on the site of a 1934 wooden structure. This site lies alongside the main Ermine Street Roman Road (HER ref CB15034) through an area of known Roman rural settlement. Remains associated with the road and adjacent activities can be anticipated.

Potential: Medium

Significance: Local

Ramsey, Cambs. Sacred Heart of Jesus

This site lies in the mediaeval core of the town, as assessed by the Cambridgeshire Extensive Urban Survey on the fen edge. Excavations nearby on the Great Whyte provided evidence to suggest domestic use, fishing prior to reclamation that began in the 15th century at which point the later mediaeval core of the town expanded. Late mediaeval and earlier remains can be anticipated.

Potential: Medium

Significance: Local/Regional

St. Ives, Cambs. Sacred Heart

Built 1843 to design by Pugin and listed Grade II. Originally this building was located on Union Lane in Cambridge but became surplus to requirements on the opening of Our Lady & the English Martyrs so was dismantled and moved to St Ives in 1901/2. There is no current

information on the HER about the archaeological potential of this site, although the Cambridgeshire Extensive Urban Survey assessment of St Ives records it being in an area of early post-mediaeval expansion of the urban core.

Potential: Low

Significance: Local

**St. Neots, Cambs.
St Joseph**

There is no current information on the HER about the archaeological potential of this site, although the Cambridgeshire Extensive Urban Survey assessment of St Neots records it as lying outside the precinct of the priory and north of the Anglo-Saxon precursor settlement, in an area of post-mediaeval urban expansion.

Potential: Low

Significance: Local

**Whittlesey, Cambs.
St Jude the Apostle**

Built in 1963. There is no current information on the HER about the archaeological potential of this site, although the Cambridgeshire Extensive Urban Survey assessment of Whittlesey records it as lying on the very edge of the mediaeval urban core.

Potential: Low

Significance: Local

**Wisbech, Cambs.
Our Lady & St. Charles Borromeo**

Built in 1854 and listed Grade II. There is no current information on the HER about the archaeological potential of this site, although the Cambridgeshire Extensive Urban Survey assessment of Wisbech records it as lying outside the mediaeval urban core in an area of urban expansion associated with the introduction of the railways.

Potential: Low

Significance: Local

National Association of Decorative and Fine Arts Societies Record of Church Furnishings

Location	Date of Survey	Group	CRO Reference
Balsham	1999	Granta Group	R109/52
Barrington	2001	Granta Group	R109/52
Barton	1997	Cambridge Group	R98/46
Bottisham	1992	Cambridge Group	R98/42
Bourn	1995	Granta Group	R101/126
Cambridge, Holy Trinity	2000	Cambridge Group	R101/86
Cambridge, St. Benedict	1985	Cambridge Group	R88/60
Cambridge, St. Botolph	1990	Cambridge Group	R90/54
Cambridge, St. Edwards	1992	Granta Decorative and Fine Arts Society	R97/50
Cambridge, St. Mary the Great	1994	Granta Decorative and Fine Arts Society	R95/110
Cambridge, St. Mary the Less	1897-88	Cambridge Group	R89/53
Cherry Hinton,	1990	Cambridge Group	R90/54
Chesterton	1986	Cambridge Group	R89/53
Chippenham	1991	Newmarket Group	R91/81
Coton	1997	Cambridge Group	R98/46
Ditton, Fen	2003	Cambridge Group	R104/22
Fulbourn, St. Vigor	1990	Cambridge Group	R92/48
Grantchester	1984	Cambridge Group	R88/60
Haslingfield	1996	Cambridge Group	R96/120
Ickleton	1984	Saffron Walden Group	R87/11A
Madingley	2000	Cambridge Group	R102/071
Linton	1996	Granta Decorative and Fine Arts Society	R97/50
Over	1998	Cambridge Group	R99/84
Pampisford	2003	Granta Group	R109/052
Shelford, Gt	1996	Granta Group	R101/126
Swaffham Prior, St. Mary's	2007	Newmarket Group	R107/53
Trumpington	1992	Cambridge Group	R93/92
Westley Waterless	1982-83	Newmarket Group	R87/78
Whittlesford	2005	Granta Group	R109/52
Willingham	1991	Granta Decorative and Fine Arts Society	R91/62

This list does not include the NADFFAS Reports sent to the Huntingdon Record Office. It has not been possible to get a accurate list of these.

Appendix II: Interviews

A: Interviews and Contributors

The following people were interviewed either in person or by email/phone and asked for their views. The topics covered by this are below.

Name	Organisation	Position
Linda Holder	Baptist Union Corporation	Listed Buildings Advisory Committee Secretary
Paul Scott-Evans	Baptist Union Corporation	Listed Buildings Advisory Committee Chair
Sophie Andreae	Catholic Church in England & Wales	Patrimony Committee Vice Chair
Andrew Derrick	Catholic Church in England & Wales (Diocese of East Anglia)	Historic Churches Committee Chair
Jeffrey West	Church of England (Cathedrals and Church Buildings Division)	Senior Caseworker (Redundant Churches)
Joseph Elders	Church of England (Cathedrals and Church Buildings Division)	Archaeology Officer
Tim Reynolds	Church of England (Diocese of Ely)	Diocesan Archaeological Adviser
Richard Halsey	Church of England (Diocese of Ely)	Diocesan Advisory Committee Chair
David Eve	English Heritage	Historic Buildings Inspector
Diana Evans	English Heritage	Head of Places of Worship Advice
Linda Monckton	English Heritage	Head of Places of Worship Research
Ian Serjeant	Methodist Church	Conservation Officer
Catherine Cullis	Society for the Protection of Ancient Buildings	Churches Officer
Peter West	United Reformed Church (Eastern Region Synod)	Listed Buildings Advisory Committee Secretary

B: Topics for Discussion

What historic environment information does an exempt denomination require to meet its obligations?

- What is your process?
- Do you assess significance?
- At what stage do you assess significance?

- Do you produce guidelines for congregations?
- What advice do these give on significance?
- What is the range of expertise available to congregations/parishes, dioceses, advisory committees?
- Do you have any interaction with the local authority or English Heritage?
- Where do you go to get information?
- Does your clergy's training include advice on dealing with/managing listed buildings?
- Does your churchwarden training include advice on dealing with/managing listed buildings?
- Do you consider the wider setting of a building?
- How are you considering associated structures e.g. tombs, other buildings within the area of the exemption?

How HERs meet that requirement and what additional enhancement would be required to do so?

- Are you aware of the county HER?
- Do you know how to access the county HER?
- Have you used it?
- Have you had any feedback on it?
- Do you advise people to use it?
- What do you think of the data in the HER?
- What isn't in the HER that you need?

What information generated under the processes of the exemption can be usefully added to HERs?

- What reporting do you produce?
- Do you prepare Statements of Significance?
- What circulation does your reporting have?
- Would you consider a public circulation of reports?
- How do you record and access previous casework?

What processes for redundancy are in operation and to what extent 'heritage significance' plays into them?

- What is your process for closing a Place of Worship?
- Do you assess significance as part of this?
- How do you assess significance?
- What happens to your files on the buildings?
- Would you consider a transfer of files to the local authority?