

STATEMENTS OF SIGNIFICANCE & JUSTIFICATION

A guidance note for parishes

The purpose of this document is to provide parishes with information on Statements of Significance and Justification. It discusses what they are and when they are needed, and provides guidance on how to write them.

Introduction

When applying for a faculty, parishes are often asked to consider what effect the work they want to carry out will have on their church buildings. Whilst this may seem like a simple enough exercise for a small job, such as the installation of a wall mounted light fitting at the back of the nave, just exactly how simple is it in reality? Initial responses along the lines of “it’s only one lamp fixed to the wall” or “nobody will see it at the back of the church” may well have an element of truth, but what about the bigger picture? For example, will the historic fabric of the wall be irreversibly damaged by the light fitting? Is the style of the light in keeping with the rest of the nave lighting? Is there already an electrical supply to that wall or will more cable need running? Could extra light be supplied to the rear of the nave by other non-intrusive means (eg. a moveable stand alone lamp)? The list could go on! If this is an example of some of the things that need consideration for a small job, what about a large one?

How do you therefore assess the impact of any work (large or small) on a church building? Various factors need to be taken into consideration such as: is the building listed or in a conservation area, is it part of a group of similar buildings, what is its history and relationship with its village/town/city, did any well-known historical figures live nearby or worship there, was it built by a famous architect, etc. All these things contribute to the *significance* of the building, so any proposals for new work need to consider how this “quality” will be affected.

Parishes are also often asked to justify the work specified in their faculty applications ie. to comment on why the work is needed. For a straightforward job like the replacement of a faulty central heating boiler, it may be obvious what the need is eg. people using the church will be very cold without any heating in the building! However, further information about the boiler such as its technical specification or why that particular type/model was chosen (eg. economical, kind to the environment, etc) should also be included. This *justification* for the proposed work helps the DAC and Chancellor in assessing the suitability of the application in relation to the *significance* of the church.

What is a Statement of Significance and why is it useful?

A Statement of Significance defines what is special about your church. This could be architectural, archaeological, historical or liturgical. It also helps you to think about the wider context of your building and its relationship with the surrounding areas and how any proposed changes to it will affect these. It is a useful document to share with funders when applying for grants or to the local authority when seeking planning permission, as it will help them to understand the special features of your building and how any changes to it may affect the area or community around it. It

can also help inform any new building development in the church or its grounds by ensuring that they are done in a sympathetic manner that compliments its special significance.

Should every parish prepare a Statement of Significance?

In the ideal world, yes! A Statement of Significance can be thought of largely as a “one off” document that is always available to accompany a faculty, grant or other building permissions application if required. It will only need preparing fully once and can be “tweaked” for each application to emphasise the special significance of the part (or parts) of the building that you are proposing to change. Having one available in advance of any application means one less thing to prepare at the time of submission.

It could be argued that parishes only need to prepare a Statement of Significance if the work they are proposing to do will affect the special character of their church. However, how do you know what will affect your building’s significance if you don’t know what it is?! It is therefore recommended that a Statement of Significance is prepared by all parishes *in advance* of any proposed work. It can then be reviewed alongside the proposal to see what impact it will have. If it is considered detrimental to the significance of the building, then another solution should be sought.

Note: you will not need to submit a Statement of Significance with every faculty application. Always check with your DAC Secretary first to see if one is needed.

Who should prepare the Statement of Significance?

Anyone can prepare a Statement of Significance, although it would probably suit someone who has an interest in architectural history, archaeology and local history, as some research will be needed. If you don’t have anyone with this knowledge on the PCC or in the wider congregation, check whether you have a local history society that you could consult. Your quinquennial inspector or professional advisor may also be willing to help, although you need to ask them whether they will charge for this service *before* they start. See later section, *Preparing a Statement of Significance*, if you would like some guidance on how to write one.

What is a Statement of Justification?

A Statement of Justification gives you the opportunity to explain why the work you are seeking permission for should be allowed. It asks you to consider the impact of the work on your building and why it is necessary. It is required for any work that will affect the significance of your church and needs to be submitted at the same time as the faculty application. It should be prepared with reference to the Statement of Significance as some of the things you will be asked to include in it should already have been considered in that document. See later section, *Preparing a Statement of Justification*, if you would like some guidance on how to write one

Note: you will not need to submit a Statement of Justification with every faculty application. Always check with your DAC Secretary first to see if one is needed.

Preparing a Statement of Significance

You will need to do some research before preparing your Statement of Significance. How much you need to do, which sources you need to consult for information, what you should include and the length of your document, will all depend on the importance of your building.

The following sections look at the things you need to consider when preparing your document, from carrying out the initial research to the production of the final statement. Information on publications, sources and websites referenced here are listed at the end of this document.

1) Initial Research

Start by gathering basic information about your church such as its listing (I, II* or II), whether there are any scheduled ancient monuments or other listed structures within its boundaries and whether it is in a conservation area, national park or site of special scientific interest. Always quote this information on the statement.

Next put some flesh on the bones of your basic information. If your building is listed, a good starting point is always the list description. These are available from your local authority, Cadw, your DAC Secretary or the online Historic Wales Portal.

If it is unlisted, the next best thing to look at is the *Pevsner Buildings of Wales*' guide for your county. These guides are particularly useful for both listed and unlisted buildings as they often contain information about the architecture, history, building materials and contents of a church. They are widely available in bookshops and libraries.

Do you already have a booklet or guide describing your church? If so, you could use this as a basis for the statement. However, always make sure the information in the guide is accurate. You can do this by "checking its references" ie. where did the information in it come from? If it came from the local history society or a Pevsner guide you can be fairly certain it is accurate. If it is just a list of facts with no reference to sources, then you should be more circumspect about using it.

Do you have an inventory for your church? These were compiled some years ago (along with the logbook and terrier) and are kept in each parish. They often contain an architectural history of the building as well as a detailed inventory of its contents and can prove very useful for highlighting the most important features of a church.

Do you have copies of any past quinquennial inspection reports? Inspectors are asked to give a brief description of the church for a "regular" report and a more detailed one if any major works have taken place since the last inspection. For the detailed reports, they are asked to comment on the buildings architectural history, materials and construction. All quinquennial reports should also contain a note of any designations that apply (eg. listed building, conservation area, etc).

Another good source of information is the Welsh Historic Churches Survey, which was a project commissioned by Cadw and carried out by the four Welsh archaeological trusts. Data on medieval churches was gathered on a county basis and

most reports are now available online or by contacting the trusts directly. Some of the trusts have also produced further individual reports on churches as a result of the survey.

Photographs and a floor plan (eg. from a quinquennial inspection report) can also be useful to include in a Statement of Significance.

2) Social History

You should already have a good idea of the basic architectural history and special features of your church through your initial research, but what about its social history? Consider how the church relates historically to its local and wider community. Could it be of national significance through its historical links or architecture? Perhaps it was built by a prominent local family who played an important role in shaping Welsh or British history? Or maybe it was built as a result of the industrial revolution when the population of many towns and cities increased dramatically?

Many local bookshops, libraries and museums often have local history sections where you can find information about your area. Local record offices (run by local authorities) are also a good source.

Don't forget to include "recent" history either! What developments have taken place in your local community from the start of the twentieth century onwards? Was it affected by the first or second world wars? Is there a war memorial near the church or within the churchyard? Are there any housing developments, industrial, business or retail parks, schools, hospitals, etc, in the area? Does it have good transport links? Have any of these had an impact on the church?

3) The Churchyard

Don't forget to research your churchyard! These are often wildlife havens for rare or endangered species of plants and animals. Pay particular attention to the presence of any protected species you may have such as bats and newts. Have you already had an ecological assessment done recently? If so, include this information in your statement and how you are already managing your churchyard. If not, think about getting one done.

Do you have any important structures in the churchyard such as monuments, tombs or buildings that are listed or scheduled in their own right? Do they have any important historical or architectural associations? Don't forget to include lychgates, churchyard walls and trees in your research.

The Church in Wales publication, *Management of Churchyards Policy and Guidance*, contains information on the above (along with more general issues) and is a good place to start if you do not currently have any provision for churchyard care. The Caring for God's Acre charity also has lots of information on its website about setting up a sensitive management regime for churchyards.

4) The Setting of the Church

This will form a very important part of your Statement of Significance. You will therefore need to think about how your church relates to its immediate and wider environment, sometimes called its *setting*. Consider how the church contributes to its landscape or townscape and how these things collectively contribute to the *character* of the area. How do you even define character? Luckily, several local authorities, Welsh archaeological trusts and Cadw, have already carried out some characterisation studies. These studies define what makes a place, town or landscape special.

The studies range from Historic Landscape Characterisation (usually produced by the archaeological trusts) through to individual town studies (produced by Cadw and the local authorities). In addition, many local planning authorities have produced design guides and supplementary planning guidance that discuss what makes particular places special and gives them a local “distinctiveness”. For an example of a study, see *Dolgellau: Understanding Urban Character*, produced by Cadw.

It is worth finding out what characterisation studies are available in your area *before* starting your own research. These studies will give you a good general overview of your area before you start to “home in” on what contribution your own church makes to the local distinctiveness. If you are not certain what is available in your area, try an internet search as most studies are readily available to download or view online. If you still cannot find one specifically for your area, contact your local authority, archaeological trust or Cadw directly.

Note: do not be put off by the amount of information typically contained in a characterisation study! Only a small part will be relevant to your needs. The studies usually divide the town, city or area they cover into smaller segments (often conservation areas), so look for the information specific to the location of your church.

If there is no characterisation study for your area, you will need to do some “field work” yourself. This is not a difficult task and is still a good exercise to do even if there is a suitable study available. It will help you look critically at the setting of your church and how it relates to the other features in the area. Walk around the outside of the church and its immediate environs, armed with a notebook and digital camera, and record what you see. Do this as a group if possible and then discuss your findings collectively. An excellent guide to assist you with your field work is the Civic Trust for Wales’ publication, *Exploring Your Town: a manual and toolkit*.

Some of the things you need to consider when describing the setting of your church and which should be included in the Statement of Significance are as follows:

- What is the topography of the area? eg. valley, hilltop, coastal, etc.
- Is the church in a rural or urban setting? Describe the surrounding area.
- What is the size (scale) of the church in relation to nearby buildings or landscape features (parks, trees, hedges, etc)? Does it dominate these or is it dwarfed by them?

- Are adjacent buildings of similar age, style and construction or more contemporary? Describe them.
- Does the church form part of a coherent group of similar buildings that were constructed at the same time? eg. church, vicarage and school.

5) Putting it all Together

A Statement of Significance should be a narrative of what is important about your church and should contain all of the elements already discussed (sections 1, 2, 3 & 4). It should be an interesting and readable document with a well defined structure (see sequence suggested below). Check the spelling and grammar and make sure that a good size font (minimum 12 points) and typeface are used. Try to keep the length of the document to two sides of A4. However, this will ultimately depend on the size and importance of your church, so don't worry if you cannot fill two pages or need more.

- a) Start by setting down the basic facts of the church such as dedication, parish, benefice, diocese, statutory listing, conservation area (and/or national park, site of special scientific interest, etc), existence of protected species and statutory designations of any other items within the church or churchyard. You can present this information in a list format or use it as part of the introduction to the Statement of Significance.
- b) Next, describe the setting of the church, making sure you comment on the following: the topography of the area, the urban or rural landscape around the church, the character of adjacent buildings (include their age, building materials, scale and architectural style) and the character of adjacent landscape and streetscape features (include trees, parks, hedges, open spaces, street furniture and roads).
- c) Describe the church itself in general terms. This should include its architecture (sequence of construction, building materials, names of any well known architects, craftsman and artists associated with it), important features (font, windows, memorials, monuments, etc) and history (date founded and how the site has developed over time). Make sure you supply as much detail as possible about the items or parts of the church that you are intending to change. If it is of national or international significance, then also include this in the description, along with the reasons why.
- d) Describe the churchyard and its history, including any important man-made features (tombs, monuments, etc) and its flora and fauna. Make sure to include details of any protected species.
- e) Describe the church's contribution to the social history of the area.

Once you have written your Statement of Significance, check it for spelling, grammar, accuracy and readability. Remember this is not a static document and should be reviewed on a regular basis when new work is done on your church, or there are changes to the area around it.

Preparing a Statement of Justification

A Statement of Justification is normally only required for significant proposals such as major works (especially to a Grade I or II* listed church), large reordering projects, a change of use (eg. opening a cafe) or other works that will substantially alter the external or internal appearance of your church. It allows you to explain why the work you are proposing to do in your faculty application should be permitted and what impact it will have on the significance of your church. The contents of each statement will therefore change depending on the type of work you want to do for each faculty application. If you have already prepared a Statement of Significance you will not need to do any further research for your Statement of Justification, as most of the extra information you need to submit will come from your project proposals. Make sure you include the Statement of Significance with the faculty application so that you do not have to repeat what is already in there.

The Statement of Justification form that accompanies the faculty application, asks five questions relating to the proposed work and what effect it will have on the church, its significant features, its setting and churchyard. The following sections discuss the questions and what should be included in your response to them:

Question 1 - Put into context the importance of that part of the church or feature proposed to be repaired, removed or altered. Consider rarity, historic or artistic value, liturgical significance and contribution to the architectural character of the church.

Here, you need to describe which part of the church will be affected by your proposals and what its importance is in relation to the overall significance of the building. For example, if you are requesting permission to remove a carpet in the nave, you may want to discuss the original internal design or configuration of the church. Was the floor intended to be seen? Perhaps the church is a classic example of decorated Victorian Gothic architecture and the tiles were an integral part of this? Maybe they are rare examples by a well-known tile manufacturer or designer? If so, describe why they are important and how the work you are proposing to do will affect them (positively or negatively).

Question 2 - Explain how the character of the church or feature is enhanced by the proposals.

This section asks you to consider how the proposals will affect the character of the church or the part you want to work on, in a positive way. Referring back to the example in Question 1, you might want to mention the fact that most churches were not built with carpeted naves in mind! Removing the carpet would therefore contribute to the restoration of the church's original design, in addition to providing good natural ventilation to the floor.

If you have a much bigger project in mind, such as a major reordering that may include providing better catering facilities (eg. for a cafe), meeting rooms, new heating & lighting, etc, then you will not only need to discuss how each of the elements or features of the church will be affected by the proposals (as per question 1), but also how these items *as a whole* will enhance or improve the character of it.

Bear in mind that not all work will necessarily improve the character of the church and may actually detract from it. For example, introducing a new kitchen and toilet into a medieval church would certainly adversely affect its character. However, this would need to be balanced against the positive enhancement the feature may provide, such as opening up the church for wider community use. Make sure that you put both sides of the argument in your statement.

Question 3 – Set out the reasons for the proposals and, in the case of removals or alterations, explain what has been done to address the issue in other ways, if anything.

This section is asking you to think carefully about your proposals and to explain why you decided to do them in that particular way. If there are several ways of achieving the same result, then you need to discuss these and explain why you choose the one you did. For example, if you are requesting the removal of the pews and their replacement with movable chairs, then you need to explain why. Is it because you want some flexible space so that the church could be reconfigured for concerts, plays, cafe seating, etc? If so, will removing the pews really give you the space you need? Could you achieve a flexible space without removing the pews? If not, then explain why not. Did you consider only removing the pews in a particular area of the church (eg. the nave)? If the pews are historically significant (this should already have been discussed in Questions 1 & 2) you will need to justify why you want to remove them and prove that there is no viable alternate.

Question 4 – Explain what steps (if any) have been taken to minimise any possible damage likely to arise from carrying out the proposed works to the historic fabric and overall character of the church or feature.

In this section you need to describe what the physical effect the work you are proposing will have on the church or its individual parts. In an ideal world, all work to a church building should aim not to permanently damage it. However, this is sometimes unavoidable, so you need to ensure that the work you do is as sympathetic as possible to the historic fabric and character of the church, while at the same time minimising potential damage.

A good conservation principle to bear in mind when carrying out work to a historic church is that of *reversibility*. Here, building work is specifically designed so that it can be undone at a future date, leaving minimal structural damage. Many important and significant churches have already had substantial work done to them using this principle, as it can be reversed in the future if the needs of the building change. The Grade I listed St Peter's Church in Peterchurch, Herefordshire is a good example of this. It is a rare example of an almost complete apsidal church of mid 12th century construction. It now has a kitchen and toilet unit, underfloor heating, new flexible seating and a lift. All these changes were carried out with minimal intrusion into the historic fabric of the building, which means they can be taken out at some future point in time with minimal damage to the church.

Question 5 – If applicable, will the proposals affect accessibility to the church or churchyard?

This section asks you to consider how your proposed work will affect access to your church and churchyard for people with disabilities. This does not just mean people in wheelchairs but those with limited mobility or sensory impairments, for example. If you have already carried out an access appraisal for your church, then you already know what improvements or changes can be made to make it more accessible to a wider range of users. Try to incorporate as many of these as possible at the design stage when you are having building work done, as it is easier and more cost effective to do as part of a wider programme than doing it piecemeal at a later date.

Churches need to be as inclusive as possible to all people, so any major new works need to ensure that the facilities they provide are accessible. Even when you are considering more modest alterations, such as the installation of a new sound system, you should be thinking of installing or upgrading a hearing induction loop at the same time. Likewise, works to repair paths in the churchyard should also consider whether they can be made more accessible to people with mobility issues, such as ensuring they are level or of a modest gradient.

Summary

A Statement of Significance helps to explain what is special about your church and how it relates to the wider community and environment. It is a useful document to share with funders when applying for grants or to the local authority for planning permission. It can help inform any new building development in the church or its grounds, by ensuring that they are done in a sympathetic manner that compliments its special significance.

It will only need preparing fully once and can be “tweaked” for each application to emphasise the special significance of the part (or parts) of the building that you are proposing to change. It should accompany any faculty application that may affect the character or setting of the church and churchyard. Having one available in advance of any application means one less thing to prepare at the time of submission.

A Statement of Justification is normally only required for faculty applications where there will be significant works to your church such as large reordering projects, changes of use or any other works that will substantially alter its external or internal appearance. It allows you to explain why the work you are proposing to do should be permitted and what impact it will have on the significance of your church, and will therefore change for each faculty application.

Useful Resources & Websites

There is a lot of information readily available to help you write your Statements of Significance. Firstly, check whether you have an inventory and any quinquennial inspection reports for your church (these are usually kept in the parish office along with the log book & terrier). These often contain historical information that you may find useful when preparing your statement. Once you have checked these, look through any guide books that you may already have in your church, as these can form a useful basis for the preparation of a statement. Make sure that you check the

accuracy of the information they contain before including them in a statement. The following list contains other easily accessible sources of information:

Listed building descriptions and other designations

Contact your DAC Secretary, local authority conservation officer or Cadw to check whether your church is a listed building (LB), in a conservation area or national park, in an area of outstanding natural beauty (AONB), has a scheduled ancient monument (SAM) within it or in the churchyard, is within a site of special scientific interest or is on the register of historic parks & gardens. Alternately, you can visit the online Historic Wales Portal to get information on LBs, SAMs, archaeological and historic environment records at:

<http://jura.rcahms.gov.uk/NMW/start.jsp>

Please note that the above website will only display in the *Internet Explorer* browser. You will also need to make sure that the browser's *compatibility view* setting is turned on by going to the *Tools* menu and clicking in the *Display intranet settings in compatibility view* tick box.

Pevsner Buildings of Wales' Books

There are seven regional volumes of the Pevsner Buildings of Wales' books now available. They cover the whole of the Principality and are published by Yale University Press. Most local libraries will hold the volume relevant to their particular region. For more information about the books go to:

http://yalebooks.co.uk/results.asp?sort=sort_title&sfl=series_exact&stl=pevsnerarchitecturalguidesbuildingsofwales

They can also be bought directly from local bookshops or online (eg. from Amazon).

Local Record Offices

The Archives Wales website contains contact and location information, opening hours and the types of records held, for all local authority records offices across Wales at:

<http://www.archiveswales.org.uk/index.php?id=7308>

Welsh Historic Towns Characterisation Studies

Cadw and some local authorities have produced a series of characterisation studies for towns across Wales. To find out more about the studies carried out by Cadw and to download the reports, go to:

<http://cadw.wales.gov.uk/historicenvironment/regenerationandsustainability/understandingcharacter/?lang=en>

Local authorities call their characterisation studies by many different names, so you may need to do some creative searching before you find anything relevant to your area! Try searching on keywords like *urban townscape study*, *urban characterisation study*, *historic characterisation study*, etc, for your town. Alternately, speak to the building conservation or planning officers in your local authority.

Exploring Your Town: manual and toolkit

If you cannot find any urban townscape or characterisation studies for your area, then you will need to do a bit of “field work” yourself. The *Exploring Your Town* guide from the Civic Trust for Wales will help you get started. The guide is quite comprehensive, so please bear in mind that you will only need to assess the areas that border your church and churchyard. The guide can be downloaded at:

<http://www.civictrustwales.org/toolkit/toolkit.html>

Design Guides & Supplementary Planning Guidance

In addition to characterisation studies, local authorities (and district councils) often publish design guides to help people understand what is special and distinctive about their local area or community. Anyone submitting a planning application, whether it be for listed building consent, conservation area consent or planning permission, should read the guide to ensure that the design of their proposal is in keeping with the local distinctiveness and character of the area. The guides can therefore help you understand what is special about your particular area when preparing a Statement of Significance.

Design guides can be standalone documents or form part of larger ones, such as *Unitary Development Plans (UDPs)* or *Local Development Plans (LDPs)* published by local authorities. They are sometimes designated as *Supplementary Planning Guidance (SPG)*. Design guides, UDPs, LDPs and SPGs can usually be downloaded from the planning or building control section of your local authority website.

Welsh Historic Churches Survey

All pre 19th century churches in Wales were surveyed by the four Welsh archaeological trusts in the late 1990s, with each covering its own region. The online availability of the survey data varies from trust to trust, although all will supply you with the information if you contact them. Details are as follows:

- (a) Glamorgan-Gwent Archaeological Trust (GGAT) - <http://www.ggat.org.uk/>
Phone: 01792 655208 and email: enquiries@ggat.org.uk

Additional sources of information from GGAT that may be of use:

- *Historic Landscape Characterisation*
http://www.ggat.org.uk/cadw/historic_landscape/main/english/historical.htm
- *Early Medieval Ecclesiastical Sites in Southeast Wales*
http://www.ggat.org.uk/cadw/cadw_reports/pdfs/GGAT%2073%20Early%20Medieval%20Ecclesiastical%20Sites%20Yr%201.pdf

- (b) Dyfed Archaeological Trust (DAT) - <http://www.dyfedarchaeology.org.uk/>
Phone: 01558 823121 and email: info@dyfedarchaeology

- Click on the DAT *Projects* link from the main DAT webpage for information on individual historic landscape characterisation studies, towns and buildings (including churches).

(c) Gwynedd Archaeological Trust (GAT) - <http://www.heneb.co.uk/>
Phone: 01248 352535 and email: gate@heneb.org.uk

Additional sources of information from GAT that may be of use:

- *Historic Landscape Characterisation*
<http://www.heneb.co.uk/hlc/hlcmageneral.html>
- *Medieval Christian churches, ecclesiastical sites and historic towns*
<http://www.heneb.co.uk/cadwprojs/cadwprojectsnewindex.html>

(d) Clwyd-Powys Archaeological Trust (CPAT) - <http://www.cpat.org.uk/>
Phone 01938 553670 and email: trust@cpat.org.uk

Of all the archaeological trust websites, CPAT contains the most comprehensive range of downloadable materials. See the following:

- Historic Churches Survey database
<http://www.cpat.demon.co.uk/projects/longer/churches/idxall.htm>
- *Historic Landscape Characterisation*
<http://www.cpat.org.uk/projects/longer/histland/histland.htm>
- Historic Towns, communities and settlements
<http://www.cpat.org.uk/ycom/intro.htm>

An alternate to searching each trust's website individually (for example, if you are not sure which region your church is in), is to access the Archwilio database which holds all their historic environment records:

<http://www.archwilio.org.uk/>

Accessibility Audits

When submitting a Statement of Justification, you are asked to consider how your proposed work will affect access to your church and churchyard for people with disabilities. If you therefore haven't previously carried out an accessibility audit, you will need to do one as part of your faculty application. Details of how to carry out an access appraisal for church buildings can be found on the Heritage and Conservation Resources website at:

<http://www.churchinwales.org.uk/wp-content/uploads/2013/06/An-access-appraisal-of-church-buildings-2013-Wales.pdf>

Tina Andrew
Church heritage & Conservation Officer
The Church in Wales
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