Solar for Churches

Tips for Planning & Faculty



Christine Rigden
Sustainability Lead
All Saints, Bedworth

April 2026, v1.1

This document shares insights gained through the Net Zero journey at All Saints Church, Bedworth.
The transition was supported by grant funding from the **Coventry Diocese** and **Benefact Trust**
in association with the **Net Zero Carbon 2030 Demonstrator Church** project.

Cover photo © Claire Kendall 2025.

Contents

Introduction 1
Why this guide? 1
Governance and Legal Framework 2
The Heritage Case: Addressing 'Harm' 2
The Community Value Case 3
Technical Considerations 3
Bats and Birds 4
UK Ecological Windows for Church Roof Work 4
The Political Strategy: Planning Committee 4
Financial Reality & Payback 5
Some external references 6
a. Historic England: The Definitive Guidance 6
b. Church of England: The 'Net Zero' Mandate 6
c. National Planning Policy Framework (NPPF) 6
d. Expert Societies (The 'Objectors') 6
Appendix 7
Christine's talk to the Planning Committee, 21 May 2024 7


BEDWORTH PARISH
CHURCHES
ALL SAINTS CHURCH

Introduction

Installing solar panels on a historic or listed church is more than a technical upgrade; it is an exercise in **Dual Stewardship**. As guardians of our heritage, we are called to protect the "listed gems" handed down to us through centuries. Simultaneously, as stewards of creation, we have a moral and denominational mandate to achieve **Net Zero Carbon by 2030**.

Navigating the intersection of Heritage and Climate can be daunting. The path to permission involves two distinct legal systems: the ecclesiastical **Faculty** process and the secular **Planning Permission** process. While these can feel like hurdles designed to stop progress, they are actually frameworks for proving that the "public benefit" of a sustainable future outweighs the 'perceived harm' to a historic silhouette.

This guide is born from experience. It outlines the strategic, legal, and community-led steps required to move a solar project from a vision to a functioning, carbon-cutting reality. Whether you are facing a worried PCC, a hesitant Planning Officer or an uncertain DAC, the following strategies will help you build a case that is as architecturally respectful as it is environmentally ambitious.

Why this guide?

Most national guidance tells you what the rules are. In this guide I share tips on how to win the argument when those rules seem to be working against you. It is based on a real-world project that moved from a Planning Officer's 'No to a Committee's 'Yes.' It's not a guarantee, but you may find it helpful.

Note: This guide is based on personal experience and current 2026 NPPF/DAC guidelines. Each local authority may have specific variations in their Scheme of Delegation, and each Chancellor their own interpretations of the harm vs benefit judgement.

© Christine Rigden, April 2026

Governance and Legal Framework

Before engaging with external bodies, understand the specific legal landscape for churches. The process is a "twin-track" approach. Note that achieving planning permission does not mean automatic Faculty permission, nor vice versa.

- **The DAC and Faculty:** Your first port of call is the Diocesan Advisory Committee (DAC). Since the Faculty Jurisdiction (Amendment) Rules 2022, the DAC is legally required to have 'due regard' for the Church's Net Zero 2030 target. The Faculty covers the internal and heritage aspects and, for listed churches, replaces the need for Listed Building Consent.
- The **Church Buildings Officer** for your Diocese, or the **Environmental Sustainability Officer** at Church House in London, may be worth discussing your ideas with.
- **The Planning Authority**: You still require Full Planning Permission from your local council. Be prepared to clarify that you are exempt from separate Listed Building Consent; council staff may sometimes conflate the two.
- **Pre-Planning Advice**: Consider paying for official pre-planning advice from the Council. It 'oils the wheels' and gets the the Council to disclose which specific parts of the National Planning Policy Framework (NPPF) and local heritage policies they are 'guided' by. While it carries a fee (£720 in 2025), it can save time and money later.
- **Insurance:** Speak with your insurer. If they want something you can't do, discuss early and see what compromise may be negotiated. Don't assume early resistance means it's not possible.

The Heritage Case: Addressing 'Harm'

Visibility and heritage impact are the primary hurdles. You must demonstrate that any 'perceived harm' to the historical asset of the building is outweighed by 'public benefit.'

- **Visibility Analysis:** Gather evidence of the solar installation being 'visually subordinate'. Take photographs from multiple street-level angles. If trees or parapets obscure the roof, document this clearly. Consider creating a 'Visibility Map' - where will the panels be visible from, and to what extent? A highly visible array may still be possible, but more of a challenge.
- **Material History:** Investigate your roof's history via your Quinquennial Reports. If the roof was replaced in the last 50 years, you can argue that no original historic fabric is being affected. This significantly lowers the 'harm' threshold in the eyes of Historic England
- **Historic England:** Seek free pre-planning advice from Historic England early. If they can be persuaded that the impact is 'low,' their letter of support can be enough to help persuade a hesitant local Planning Officer, or the Committee.
- **Heritage Statement:** Engage an architect sympathetic to your project (hopefully your church architect) to write a formal Heritage Statement to support your planning application. They will set out the heritage features of the building, and why this project will cause 'less than significant harm' to the church as 'heritage asset'. They will need your detailed plans and external photos.
- **The 'Duffield Questions'** (or principles) are a legal framework used by the **Chancellor** to assess proposed changes to listed church buildings. They weigh the harm to historic significance against

© Christine Rigden, April 2026

the justification for change, requiring clear, convincing justification for any damage to heritage assets. The decision assesses the degree of harm and weighs it against the benefits of the proposed changes, such as improved accessibility, liturgical needs, or greater community use. Look online for more information, but here are some **examples of judgments** and rationale.

Include a List of other historic churches with solar panels in your application. It has no legal weight with the Faculty decision, but might influence a planning committee. If a Grade I listed Cathedral can have 200+ panels, it makes a Grade II parish church's much smaller array seem modest and reasonable. Here's a list to get you started, but assess them for yourself and choose what seems relevant for your application.

The Community Value Case

Under NPPF Paragraph 202, you must show the **Public Benefit** of the installation to offset any 'less than substantial harm.'

- **Environmental Impact:** Quantify the carbon reduction (eg 'This array will save X tonnes of CO2 per year'). This aligns with the Council's own Climate Emergency declarations. (However, if yours is a low energy use church and/or the planned array is small, this may not have much weight.)
- **Social Reinvestment:** Explicitly state that savings on energy bills are not just 'saving money,' but are being redirected into community mission. Mention any specific 'Warm Spaces,' social groups, youth clubs, or food bank support that the church provides.
- **Asset Sustainability:** Argue that the long-term financial viability of the building depends on reducing astronomical running costs. A closed, derelict church is a far greater 'heritage harm' than a solar array on a roof.
- **Community Energy**: Be aware that a community energy scheme, where the church leases their roof in return for a reduced cost tariff, may have issues in and of itself: potential legal complications as well as trivial financial benefit to the church. Which may affect your ability to get permission.

Technical Considerations

Your choice of hardware can influence the planning decision significantly.

- **Aesthetics:** Propose 'all-black' (monocrystalline) panels without silver frames or grid lines. Mention **'Solaskirt'** or similar flashing to hide the mounting rails and gap under the panels, making the array look like an integrated part of the roofscape. You may be able to consider matte or etched finish panels, to reduce reflections.
- **Reversibility:** This is a core conservation principle. Emphasise that the mounting system is non-destructive and the entire installation can be 'completely removed without trace' at the end of its 30–50 year lifespan, returning the roof to its original state.
- **Shading and Efficiency:** If you have trees, discuss the use of **half-cut panels with bypass diodes** versus **microinverters**. While microinverters are often recommended for shade, they increase the parts that can fail on a high roof, while also adding to the cost. Argue for the most robust, low-maintenance solution.
- **'Glint & glare'**: Depending on the church siting, you may have to consider solar glinting off the panels and into a nearby window or passing aircraft. Evaluate and see if you need a formal report.

© Christine Rigden, April 2026

Bats and Birds

In 2026, planning departments are increasingly strict about **Biodiversity Net Gain (BNG)** and protected species. Legally, there will be issues to consider and plan into your project.

Most historic churches have gaps in stonework or old roof structures. So planners and some funders may require a bat survey. Check for bats *before* committing to a contractor. A 'negative' survey (showing no evidence of bats) is a huge relief for a planning officer; a 'positive' one doesn't stop the project, but it requires a Mitigation Licence, which takes time and affects the installation window.

In addition, if you have Swifts, they return every year and are an at-risk species. It will be important to avoid disturbing them (and Swallows and Martins) during the nesting season.

Make sure your quotes include 'bird proofing', extra especially if you already have an issue with pigeons nesting elsewhere in your church. Even if you don't have any issues at the moment, solar panels often attract nesters and fitting bird guards retrospectively would mean scaffolding and cleaning up the incredible mess they leave behind. The conventional mesh is fine if your panels are not visible or your roof is very high, but if it's an Aisle roof you might want to consider Solaskirt which has a neater finish.

UK Ecological Windows for Church Roof Work

These are suggested windows of opportunity for installation, according to what sort of wildlife you have to protect. For example, if you have no bats, winter is fine. If you have neither bats nor swifts or swallows, you have more flexibility. Be sure to confirm for yourself what is right for your church.

Month	Status	Action/Advice
Jan – Feb	**High Risk**	Bats may be hibernating. Do not disturb.
Mar – Apr	**Optimal**	**Best Window.** Bats are waking; nesting is just beginning.
May – Aug	**High Risk**	Peak nesting (Swifts/Swallows) and Bat maternity season.
Sep – Oct	**Optimal**	**Best Window.** Nesting has finished; hibernation hasn't begun.
Nov – Dec	**High Risk**	Bats entering hibernation. Avoid noise and thermal changes.

Contact the **Bat Conservation Trust** for a survey (https://www.bats.org.uk/), and allow a few weeks for the report. This free service is specifically for churches. For birds, have a look at **The RSPB - Birds and the Law** (https://www.rspb.org.uk/) which explains the legalities of nest disturbance.

The Political Strategy: Planning Committee

If you know from the start that the Council's Planning Officer intends to refuse the application ('No - now what's the question?'), you must pivot to the **Planning Committee**.

- **Triggering the Committee:** The number of letters required to move an application to a public vote varies by council—often ranging from 5 to 10 unique letters. Crucially, if the Planning Officer's recommendation is the opposite of the public's view (eg they want to refuse but the community supports), it creates a 'conflict' that often necessitates a Committee decision. Letters that mention

© Christine Rigden, April 2026

'Public Benefit' or **'Climate Emergency'** are harder for an officer to dismiss than those that simply say 'I like the idea'.

- **Engaging Ward Councillors:** Contact your local councillor early. They are elected to represent the community's interest and can advocate for the project at the Committee stage. Hopefully they already have a positive relationship with the church as part of the community.
- **The 3-Minute Presentation:** If it goes to a vote, you will usually get 3 minutes to speak. Don't waste time on technical specs—focus on the heart: the climate, the community, and the survival of the church. (See the **Appendix** for an example.) Having a supportive 'public gallery' of parishioners can quietly signal to the councillors that this project has a strong local mandate.

Financial Reality & Payback

- **Solar forecasts:** Ask your installers who quote to give you a forecast of potential generation, and how much of that your church is likely to be able to use ('self-use'). You will be able to compare between companies whether their offering gives enough additional benefit to be worth any difference in cost. If you have trees nearby, ask for a proper shading analysis, rather than just plugging in a standard 'shading factor' number. The All Saints system covered 57% of electricity used by the church in the first year after installation.
- **Smart Export Guarantee (SEG):** Research business export tariffs carefully. Some providers (like E.ON) cap payments to a 15kWp array, while others (like Octopus) may offer better terms for larger church arrays.

*If you are not already with **Octopus** and want to consider changing, quote our referral code: **zappy-burn-258** and both churches (as business accounts) should get £100 credit. Octopus is currently paying 12p for export on their Panel Power business export tariff. Eon cap their 16.5p payment at a 15kW array (ours is 22kW). If you investigate others, make sure they know it's for a business customer, because domestic tariffs will not apply.*

Tip: Use AI tools (like Google Gemini) to help draft responses for the Planning Portal and grant applications. Provide the AI with your church's address, listing status, and the specific question asked; it can help frame your answers in the formal 'heritage language' planners expect. Be sure to check for accuracy in relation to your church and project, or the negative impact could outweigh the positives!

© Christine Rigden, April 2026

Some external references

a. Historic England: The Definitive Guidance

Historic England (HE) has a specific advice series for historic buildings. The most relevant document for your case is:

- **Energy Efficiency and Historic Buildings: Solar Electric (Photovoltaics)**: This is the 'gold standard' for planners. It explicitly states that solar panels *can* be acceptable on historic buildings if they are discreetly located and minimise damage to historic fabric.
- **HE Advisory Note 15 (Commercial Renewable Energy):** While aimed at larger scale installations, it reinforces the principle that 'public benefit' (climate action) must be weighed against heritage 'harm.'

b. Church of England: The 'Net Zero' Mandate

Since the General Synod's 2030 Net Zero target, the Church's own guidance has become much more assertive.

- **A Brief Guide to Solar Panels and Faculty**: Produced by the Church Buildings Council. It provides a checklist for PCCs and is designed to be read alongside HE guidance.
- **The Faculty Jurisdiction (Amendment) Rules 2022**: These rules now legally require DACs and Chancellors to have 'due regard' to the Net Zero guidance when making decisions.

c. National Planning Policy Framework (NPPF)

This is the 'law of the land' for Council Planning Officers. You should reference **Section 16: Conserving and Enhancing the Historic Environment**.

- **Paragraph 203 (NPPF 2024):** Directs authorities to look for 'social, cultural, economic, and environmental benefits' of conservation.
- **The 'Public Benefit' Test:** If an officer claims 'harm' to a listed building, you point them to the NPPF's requirement to balance that harm against the massive public benefit of carbon reduction and the financial sustainability of a community asset.

d. Expert Societies (The 'Objectors')

Knowing the stance of the 'National Amenity Societies' helps you pre-empt objections:

- **SPAB (Society for the Protection of Ancient Buildings**): Generally supportive of renewable energy provided it is reversible and visually subordinate.
- **The Victorian Society:** Often the most 'precious' about visibility (as seen in the **St Luke's West Holloway case**: This case proved that even when an array is very visible, it is not 'intrinsically harmful' if a strong case for Public Benefit is made). Advice about 'all-black panels' and 'Solaskirt' is a direct technical answer to their typical objection of 'intrusive glare' and you may be able to specify a matte finish as well.

© Christine Rigden, April 2026

Appendix

This page is an example of how one *might* approach the 3 minutes 'speech' before a planning committee, for those who have never done it before. It is not intended to be a template, for ours was one particular project in one particular borough. Your context will vary. Practice what you've written and polish it to remove any bits you stumble over. You will be stopped at the 3 minute mark whether or not you have finished, so practice and polish until you can reliably finish prior to that point. The other person speaking might want to address a different aspect of the project, such as social benefit.

You can also arrange to give committee members a handout of supplementary information, though in theory they will have already read your application and the officer's report. You will want to address the points in the report that were negative.

Christine's talk to the Planning Committee, 21 May 2024

Thank you, Chair, and Committee.

According to a High Court judgement in 2013, 'significant harm' is **an exceedingly high threshold**, so serious that the intrinsic significance of the church would be massively or completely negated, by the proposed installation. The NPPF update in July 2019 also says: 'in determining… substantial harm, [will] the adverse impact seriously affect **a key element** of its special architectural or historic interest?'

According to the **Ecclesiastical Exemption** in 2010, prime responsibility for the conservation of a listed church resides with the Church of England, not the secular authorities. The C of E has long experience with conserving their heritage assets, and has judged this proposed installation to be safe and appropriate.

As you can see on the **annotated** mock-up in your handout, the panels would not be visually intrusive, in their particular setting on the LOWER roof at the BACK of the church. Nor are they visible from any of the three designated 'primary views' of the town conservation area, nor from any other parts of the town beyond that in front of the Health Centre and Civic Hall.

Solar panels have been installed on many historic churches, (often in Conservation Areas), such as Kings College Cambridge chapel, and York Minster. A list of examples is included in your information pack. All of these Listed churches will have been evaluated against the same planning framework as today.

We had pre-planning advice from **Historic England**, who visited the site and deemed the harm to the building to be 'on the low side of insignificant' - the ***low*** side of ***insignificant*** - and *even less* harm to the Conservation Area. That letter is in your information pack. There is only one South Aisle, and one roof above it. There is no ambiguity of location.

Both the Government and Church of England advise that the installation of renewable energy generation on listed buildings be given significant weight in terms of **Public Benefit**, for 2 reasons: Firstly, mitigating the effects of climate change is deemed by both bodies to be highly valuable. Secondly, it will improve the long-term financial viability of the Church, and its ability to maintain the historic structure of the building.

Please vote to approve this application.

© Christine Rigden, April 2026