

CHURCH  
HEATING

8

PERMISSIONS  
AND  
REGULATIONS



# CHURCH HEATING

- 1 PRINCIPLES
- 2 PERSPECTIVES
- 3 APPROACHES
- 4 DECARBONISING AND THE FUTURE OF HEAT
- 5 HEATING CHECKLIST
- 6 PITFALLS
- 7 OPTIONS APPRAISALS AND GETTING ADVICE
- 8 PERMISSION AND REGULATIONS
- 9 COSTS AND FUNDING
- 10 TEMPORARY HEATING OPTIONS
- 11 CASE STUDIES
- 12 SUMMARY FLOWCHART

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- 8.1 Introduction
- 8.2 Finding trusted traders
- 8.3 Faculty permission
- 8.4 Planning permission
- 8.5 Building regulations
- 8.6 Industry standards to be aware of
- 8.7 Ongoing inspection
- 8.8 Conclusions

## 8.1 Introduction

Carrying out work on heating systems, whether they be electric, gas or oil, needs to meet certain standards. The professionals and installers who you employ to work at your church should have certain qualifications or accreditations, so you can trust their work meets these standards.

Changing to a new heating system will often require faculty permission (from within the Church of England) and sometimes planning permission (from your local planning authority). Particularly large projects may also require Building Regulations sign-off, although most smaller work will be self-certified by the tradespeople involved.

This section of our heating guidance outlines the key points of which you need to be aware. It does not aim to cover how to make a faculty or planning application, but only to alert you as to when it is required. More information on the faculty system is available through our website: [How we manage our buildings | The Church of England](#)

## 8.2 Finding trusted traders

### Electrical work

Electrical work must only be undertaken by contractors approved either by the National Inspection Council for Electrical Installation Contracting (NICEIC) or by the Electrical Contractors Association (ECA).

To find or check an NICEIC registered contractor, go to [www.niceic.com](http://www.niceic.com) or call 0333 015 6625.

To find or check an ECA registered contractor, go to [www.eca.co.uk](http://www.eca.co.uk) or call 020 7313 4800).

Very often, reliable contractors are members of both.

### Heat pumps (F-gas work)

MCS Accreditation should be sought for all heat pump installations; both for the heat pump itself and for the installer. It would also be good practice for installers to be members of the Renewable Energy Association, so it is worth checking both lists. [MCS Certified | Giving you confidence in home-grown energy](#) and [Home - REA \(r-e-a.net\)](#)

Work on any systems which include a refrigerant gas is **known as 'F-Gas work'; this includes air conditioning** systems, and some types of Air and Ground Source Heat Pumps. Such work must only be undertaken by a contractor certified to handle fluorinated greenhouse gases.

There are three places to look for such contractors: [refcom.org.uk](http://refcom.org.uk), FGRegister, and Bureau Veritas.

See [www.fgasregister.com/](http://www.fgasregister.com/).

### Gas fired boilers and systems

Gas work must only be undertaken by a Gas Safe registered engineer holding the correct and relevant qualification for working on the type of gas appliance/ boiler/pipework at your church. This includes the decommissioning and capping-off of existing supplies. The removal of redundant gas meters has to be carried out by your gas meter operator who you can contact through your current supplier.

To find or check a Gas Safe registered engineer, go to [www.gassaferegister.co.uk](http://www.gassaferegister.co.uk) or call 0800 408 5500.

If needed, further guidance is available from Technical Bulletin 014 Gas Work (find on the site [www.gassaferegister.co.uk](http://www.gassaferegister.co.uk)).

### Oil fired boilers and systems

Work on oil fired boilers or other off-gas-grid boilers (e.g. electric heating, LPG, solid fuel) must be undertaken by contractors registered with OFTEC.

To find or check an OFTEC registered contractor, go to [www.oftec.co.uk/](http://www.oftec.co.uk/) or call 01473 626 298.

The storage of oil at churches is covered by the oil storage regulations for businesses - [Storing oil at your home or business: Storing oil at your business - GOV.UK](#)

Any unused oil tanks must be decommissioned and removed from site to avoid potential environmental damage being caused by the oil sludge at the bottom of seemingly empty tanks leaking into the environment as tank degrade. Old oil tanks and the oil within them are treated as contaminated waste and must be handled accordingly.

### Multiple trades, including electrical and plumbing

Look on NAPIT, which is a Government-approved and UKAS-accredited (UK Accreditation Service) membership scheme, operating in the building services and fabric sector. There are currently more than 16,000 NAPIT registered installers in the electrical, heating, plumbing, ventilation, microgeneration and building fabric trades across the UK domestic, commercial and industrial markets. [NAPIT | Promoting Excellence in the Building Services & Fabric Sector](#)

### Building Services Engineers advice, when changing your system

When considering changing your system, and needing advice on options, the key expert you are likely to need is a Building Services Engineer.

A Building Service Engineer can report to you on the feasible options and their pros and cons. They are independent, and can assess a range of options. CIBSE has a directory of specialists: [www.cibse.org/directories/directory-of-practices](http://www.cibse.org/directories/directory-of-practices)

For most church projects, the advice will need to be from someone with experience of large, heritage buildings, not domestic or commercial projects. When looking for an external heating designer, always ask about their experience with church buildings. The CIBSE directory of practices lists members with experience in religious, historical and conservation projects. Try to find examples of their work which you can visit, and discuss their work with the other church clients.

The CIBSE heritage group can advise on the significance of existing systems and give a general direction of thought about a project ([Heritage Group | CIBSE](#)).

### Other professionals

**Whilst most DAC's have a heating or buildings services advisor**, who may be able to offer a degree of free input at key points, it is not their role to design the system. It is, however, very much recommended that you consult the DAC early on in your project to see what help is available in your diocese, and then again before committing to a particular approach.

Your church architect may be able to give general advice, but they are not heating specialists.

Your local plumber or electrician is very unlikely to understand the full range of options.

The Historic England Buildings Services Team can offer advice on listed buildings, in certain circumstances. Contact your local authority conservation officer and ask them what advice is available.

Parish Buying offers energy audits, as do some dioceses, which can set the heating work in a wider context.

### Good tradespeople will ensure your work is compliant

If the work at your church is carried out by suitably accredited firms, from the lists above, then the firms you use should ensure that all the required regulations are followed.





## 8.3 Faculty permission

*Important note: The faculty rules vary depending on when you started your application?*

*On the 1st of July 2022, the Faculty rules that govern how churches manage their buildings, churchyards and contents changed, making it easier for churches to request works that reduce their carbon emission in line with the Church's aim to [become net-zero by 2030](#)*

*As part of these new rules, several works have been added to List A (where permission is not required) and List B items (where archdeacon consent is required). In some cases, previous List B items have been removed; for others, updated specified conditions may be applied.*

*Please be aware that there are now three different processes available for Faculty cases, one for cases submitted under the 2015 rules, one for cases submitted under the 2019 legislation, and a third for cases submitted under the 2022 legislation. Any application made under the 2015 and 2019 Rules will remain under that specified version and will not automatically be moved to the newer legislative version.*

<https://facultyonline.churchofengland.org/home>

The guidance below assumes that you are making a new application, under the 2022 rules.

### Repairs and maintenance of your existing system

Most maintenance can proceed without needing to seek **permission, because it is covered by “List A” of the faculty rules.**

These rules clearly state that the following are included **in List A1(6)**, “Works of maintenance, repair and adaptation (not amounting to substantial addition or replacement but including rewiring) to existing (a) heating systems (including the replacement of control equipment and the insulation of pipes in the boiler room and ancillary service areas) (b) gas, **water or other services”.**



The conditions to be met are that::

- The works do not involve making additions to an electrical installation.
- Any work to a gas fitting is carried out by a person who is registered on the Gas Safe Register (or is a member of another class of persons approved by the Health and Safety Executive for the purposes of Regulation 3(3) of the Gas Safety (Installation and Use) Regulations 1998).
- Any work to an oil-fired heating system or to an electrical installation or electrical equipment is carried out by a person whose work is subject to an accredited certification scheme (as defined in rule 3.1(6))
- In the case of adaptation, the parochial church **council's insurers are notified of the proposals**

If the parish is in any doubt over whether work they are planning is covered, they should consult their archdeacon, who may suggest seeking the opinion of the DAC Secretary.

### Replacing your heating system, like-for-like

From 1st July 2022 onwards, the faculty rules for like-for-like boiler replacements have changed. Previously, these **were all 'List A' and did not require specific permission**, unless they breached any of the general conditions.

From July 2022 onwards,

- Like-for-like replacement of a non-fossil fuel system is on List A (i.e. no permission required). See rule A1(7)(a).
- Replacement of a fossil fuel boiler with a non-fossil-fuel boiler in the same or similar position and with the same or similar cable runs is on List B (i.e. check with your archdeacons whether faculty is required). See rule B1(5).
- Replacement of a gas tank is on list B. See rule B6(4)a.
- Replacement of a fossil fuel boiler (oil, gas, LPG) with another fossil fuel boiler now requires a full faculty application (i.e. it is no longer on List A or List B).
- Replacement of an oil tank requires a full faculty application (i.e. it is no longer on List A or List B).

For information about how to make a faculty application, speak to your DAC or read the national website here: [How we manage our buildings | The Church of England](#)

**All faculty applications must have “due regard” to key items of national guidance on Net Zero Carbon and this includes all such heating applications. The key sections to which you must show due regard are [Section 1](#) (Heating Principles), [Section 5](#) (Heating Checklist) and [Section 7](#) (Options Appraisal).**

## Installing a new type of heating system

In general, installing any new type of heating system will require a full faculty application, because it will be changing the appearance of the church, require drilling into fabric, and changing the heating patterns of the church, which may in turn affect the historic fabric and contents.

There is one exception to this, which is installing electric pew heaters is now a List B item (see rule B4(10)a). This **allows for**, “*The installation of an electrical heating system for attachment to pews made in or after 1850 and which are not of historic interest*”.

The conditions are that:

- Details of the appliances, their proposed location and fixing and the location of any cable runs are submitted to the archdeacon when the archdeacon is consulted on the proposal to undertake the matter
- Any work to an electrical installation or electrical equipment is carried out by a person whose work is subject to an accredited certification scheme (as defined in rule 3.1(6))
- No article of historic or artistic interest is removed or disposed.

Where a faculty application is needed, for information about how to make the application speak to your DAC or read the national website here: [How we manage our buildings | The Church of England](#), and ensure you have had due regard to the heating guidance mentioned above.





## 8.4 Planning permission

### Planning permission – general overview

#### Internal changes

Internal changes to church buildings are covered by faculty rather than planning, because of the ecclesiastical exemption. You will not need planning permission.

The ecclesiastical exemption recognises that church buildings are places of worship, and allows the Church to balance mission, worship, and wider community use, with care and conservation. We only have the exemption on the condition that we maintain our own, equivalent, heritage protection system that largely parallels the secular planning system, but in a Church context.

#### External changes

As with all secular buildings, churches do require planning permission for certain external development, for example extensions or other alterations/additions. In very general terms, planning permission is needed for most new buildings, works that affect the external appearance of a property and for material changes of use. Planning permission is also required for relevant demolition in a conservation area.

Planning permission may be needed in addition to listed building or scheduled monument consent. The application process and requirements for each are different.

What activity does and does not require planning permission is matter of considerable complexity. The **Government's Planning Portal provides much useful** advice. Your appointed architect should be able to guide you, and any doubts should be raised directly with planning or conservation officers in the relevant local planning authority.

A failure to apply for planning permission when required can lead to an enforcement notice being served requiring reversal of the works. Failure to follow an enforcement notice is a criminal offence.

Works forming part of Nationally Significant Infrastructure Projects do not require planning permission, but instead require development consent.

**Many minor works are considered to be “permitted development” and are therefore deemed to have** permission, provided conditions are followed.

These permitted development rights may be restricted or removed by an article 4 direction, sometimes seen in conservation areas in particular.

### Planning permission as it applies to heating systems

In relation to heating systems, planning permission will generally be required for:

- (for listed buildings and/or in conservation areas) adding a new flue, or moving a flue to a new position,
- external plant, for example the external units for Air and Ground Source Heat Pumps, and
- associated acoustics.

For unlisted buildings, not in conservation areas, changing a flue or an oil tank is normally considered a permitted development, see reference: <https://www.planningportal.co.uk/permission/common-projects/flue-chimney-or-soil-and-vent-pipe/planning-permission>.

Generally, heat pumps are not covered by permitted development rights even for non-listed buildings, and therefore require planning permission.

## 8.5 Building Regulations

Work done at a church, or other building, must meet certain Building Regulations.

In most cases, compliance is simply self-certified by the professional carrying out the work, who will be **registered with the relevant “competent persons”** scheme. For example, if your electrical works are carried out by a NICEIC or ECA accredited electrician, then they will give you a signed completion certificate which will demonstrate compliance.

The exception will be if your project involves a new building or extension. In this case, building control sign-off would be required. Your project architect is best placed to advise on the requirements for building control approval, and the means by which this is signed off (either through a local authority or approved inspector).

Regardless of the methods for formal approval, all works must be designed and installed in accordance with the relevant Building Regulations Approved Document:

The design and installation standards necessary to meet building control approval are set out in a number of **‘Approved Documents’**; those most pertinent to heating projects are listed below.

**B: Fire Safety.** Typically, churches will not require any substantial fire precaution measures such as alarm systems or emergency lighting. Consideration may need to be given however to any reordering or alteration works that introduce new internal spaces (creches, meeting rooms, etc.) or open the building for unsupervised community use. This regulation has some relevance for boiler cupboards, with heat detectors over boilers. These are standard practice, by any reliable installer, and any issues should be alerted at your annual boiler inspection.

**G: Sanitation, hot water safety and water efficiency.** This covers water efficiency and the management of pressure and temperature within hot water delivery systems, including point-of-use hot water systems.



J: Combustion appliances and fuel storage systems. This provides guidance and minimum standards for the safe installation of combustion heating systems, including ventilation to boiler spaces, flue arrangements to safely discharge products of combustion and the safe storage of fuels. All fuel-based heating systems have mandatory safety standards covering the workmanship, inspection and certification of installations. It is very important that competent and certified installers are used.

L: Conservation of fuel and power. The parts of this document covering alterations to existing buildings will typically be most appropriate, although the methodology may not be relevant for simple upgrade or refurbishment projects in heritage buildings. Accompanying this regulation however is a set of minimum standards for selection of plant and equipment which should be observed in all new installations: the Non Domestic Building Services Compliance Guide.

P: The Electric Safety regulation is worth being aware of, but applies only to *domestic* premises. It states that new electrical wiring and changes to electrical systems should always be carried out under strict accordance with BS 7671 (the electrical wiring regulations) by a professional certified under an approved scheme (the National Inspection Council for Electrical Installation Contracting - NICEIC).

## 8.6 Industry standards to be aware of

Your contractors should be aware of, and ensure compliance with, the relevant ones from the following standards:

- Relevant Building Regulations (and approved documents) - as above
  - For heat pumps:
  - MCS accreditation - standards for renewables including heat pumps, both the heat pump itself and the installer ought to be MCS accredited
- Fluorinated gas (F gas): guidance for users, producers and traders - Requirements if you work with F gas (Environment Agency and Department for Environment, Food & Rural Affairs). See [www.fgasregister.com/](http://www.fgasregister.com/).
- For electrical systems: BS 7671:2018 + A2:2022 Requirements for Electrical Installations, IET Wiring Regulations Eighteenth Edition.
  - For gas systems:
  - The Gas Safety (Installation and Use) Regulations 1998
  - IGEM Guides and Codes of Practice
  - For oil systems: OFTEC guidance and Codes of Practice
  - **For any 'wet' system (i.e. water-fed radiators, or water-fed underfloor heating):**
  - The Water Supply (Water Fittings) Regulations 1999
  - Water Regulations Approval Scheme (WRAS) Regulations
  - CIPHE Guides and Codes of Practice (Chartered Institute of Plumbing & Heating Engineering)
  - Building services generally: CIBSE Guides and Codes of Practice
  - Health and Safety at Work Act, including current regulations and Statutory Instructions issued by the Health & Safety Executive

## 8.7 Ongoing inspections

Once your heating system is installed, it needs to be maintained, to ensure it is running safely and efficiently.

**Heat pumps:** Air conditioning inspections are legally required for any system which has over 12kW of cooling capacity, after 5 years and every 5 years thereafter. This will cover most air-to-air heat pumps systems.

**Boiler inspections:** Annual gas / oil boiler inspections are strongly encouraged, and may be required by your insurance provider. Running dangerous equipment could bring you into issues with health and safety legislation, and the best way to avoid this is through regular inspection and maintenance. Many church buildings are limited in space to accommodate boiler plant, so store rooms, vestries and other occupied rooms are often used or adapted, and the maintenance of passive ventilation (typically air bricks or louvres in the wall) to dilute and remove products of combustion can be critical to health and safety. It is important that the room used to accommodate boiler plant is maintained and inspected alongside the plant itself.

## 8.8 Conclusions

Major changes to your heating are likely to require faculty permission, including – since July 2022 – like for like oil and gas boiler replacements.

Some changes also require planning permission, most commonly if they affect the external appearance of the building, such as flues, oil tanks, and heat pump units.

Whilst the list of regulations above may at first appear daunting, if the professionals the church appoints are appropriately accredited then they will ensure all work meets the required standards. Choosing trustworthy firms from the bodies mentioned in section 8.2 is key ensuring work is done safely and to the required standard.

