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Our ref: EP/1460/JB
Your ref: PP-10430860

Dear Sirs

**ST STEPHENS COURT, SHILDBORN DRIVE, HARPURHEY, MANCHESTER, M9 5AY
INSTALLATION OF AN AIR SOURCE HEAT PUMP WITHIN THE CURTILAGE OF ST STEPHENS COURT**

I refer to the above application for the provision of Air Source Heat Pump (ASHP) located within the grounds of St Stephens Court, Harpurhey, Manchester, M9 5AY, submitted via the Planning Portal. In detail, the following are submitted:

- Application Forms including Certificate A;
- Site Location Plan;
- Equipment details (Chiller Package Type AA303S Typical Arrangement (Free-Standing Sliding Attenuator);
- Manufacturers Specification (CAHV Monobloc Heat Pump System); and a
- Plant Noise Impact Assessment.

The application fee of £462.00 has been paid directly via the Planning Portal.

Site Description

St Stephens Court is a retirement housing complex built in 1988 and run by The Guinness Partnership. The site consists of a two storey, red brick, frontage building which extends significantly to the rear. There are single storey elements to the side elevations. There are garden areas to the sides and rear of the building. The surrounding area is predominantly residential. Harpurhey Community Church is located to the north-west and shares a boundary with the application site.

Proposed Development

The application seeks planning permission for the installation of a CAHV Monobloc Heat Pump System within the curtilage of St Stephens Court. The installation of the unit will enable a significant reduction in emissions from the existing heating systems serving the building.

ASHPs operate by absorbing heat from the outside air – heat is absorbed at low temperature into a fluid, which is passed through a compressor to increase the temperature, and then transferred into the heating and hot water circuits of a building. The pumps use electricity to operate, however, the heat output is greater than the electricity input, making them an energy efficient method of heating buildings.

It is notable that the size of equipment exceeds the Permitted Development allowance under Part 14, Class G of the GPDO 2015 (as amended) but would otherwise be Permitted Development. Planning Permission is therefore required.

Planning Policy

Planning applications will be determined in accordance with the Development Plan. The development plan comprises the saved policies of the Manchester Unitary Development Plan (UDP) dating back to July 1995, together with policies contained in the Manchester Core Strategy Development Plan Document - adopted on 11 July 2012. The most up-to-date policies concerning renewable energy are found within the Core Strategy.

Manchester Core Strategy

Policy SP1 (Spatial Principles) seeks to ensure that development minimises emissions, ensures efficient use of natural resources and reuse of previously developed land wherever possible.

Policy EN4 (Reducing CO2 Emissions by Enabling Low and Zero Carbon Development) seeks to ensure that development follows the principle of the Energy Hierarchy, by being designed to reduce the need for energy through design features that provide passive heating, natural lighting and cooling; to reduce the need for energy through energy efficient features such as improved insulation and glazing; to meet residual energy requirements through the use of low or zero carbon energy generating technologies; and to be located and designed in a manner that allows advantage to be taken of opportunities for low and zero carbon energy supplies be used as a mechanism to help improve energy efficiency and provide low and zero carbon energy supplies to existing buildings.

Policy EN5 (Strategic Areas for low and zero carbon decentralised energy infrastructure) achieving an increase in the level of decentralised, low and zero carbon energy supplies

EN6 (Target Framework for CO2 reductions from low or zero carbon energy supplies) provides a Framework for CO2 reductions from low or zero carbon energy supplies.

EN7 (Energy Infrastructure opportunities low and zero carbon decentralised energy schemes) states that there will be a general presumption in favour of low and zero carbon decentralised energy Schemes.

DM1 (Development Management) seeks to ensure that new development has due regard to the impact on the surrounding areas in terms of the design, scale and appearance of the proposed development. Development should have regard to the character of the surrounding area.

National Planning Policy Framework (Revised 2021)

The National Planning Policy Framework was revised on 20 July 2021 and sets out the government's planning policies for England and how these are expected to be applied. This revised Framework replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018 and updated in February 2019.

The 2021 National Planning Policy Framework (NPPF) establishes the overarching principles of the planning system, including the requirement of the system to “*drive and support development*” through the local development plan process. The NPPF requires development to contribute to the transition to a low carbon future, reduce energy consumption and contribute to and conserve the natural environment.

Para 158(a) of the NPPF states that when determining planning applications for renewable and low carbon development, local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions.

UK Sustainable Development Strategy

In 2005, the Government published an updated strategy for implementing sustainable development across the UK. This strategy acts as an overarching document from which a range of specific policies and legislation was derived. Although published in 2005, the strategy has taken a recently renewed focus considering the Government's definition of Sustainable Development in the NPPF.

One of the key aims of this strategy is to recognise the threats of climate change and ensure that the UK develops a strategy to mitigate and adapt to this phenomenon. The document established five key principles that will underpin the national sustainable development strategy:

1. Living within Environmental Limits;
2. Ensuring a Strong, Healthy and Just Society;
3. Achieving a Sustainable Economy;
4. Promoting Good Governance; and
5. Using sound science responsibly.

The strategy will be implemented at a national level through the development of more specific strategies at a Government department or sector level. With regard to planning and the built environment, this document set the basis for the development of plans and policies that promote development that mitigates and adapts to climate change.

Climate Change Act

The Climate Change Act (2008) sets a legally binding target for reducing UK CO₂ emissions by at least 80% on 1990 levels by 2050. It established the Committee on Climate Change, which is responsible for setting binding interim Carbon budgets for the Government over successive five year periods. The first three Carbon budgets were announced in the Budget 2009, resulting in an interim target of a 34% reduction in CO₂ equivalent emissions on 1990 levels by 2020.

UK Carbon Plan

In 2011, the Government published an updated Carbon Plan setting out how the UK will achieve deCarbonisation and make the transition to a low Carbon economy. It sets this objective within a framework of mitigating and adapting to climate change and maintaining energy security in a way that minimises costs and maximises benefits to the economy.

With regard to development, the Carbon Plan presents the Government's approach to promoting the delivery of low Carbon, resilient and adaptive buildings and enabling sustainable transportation as positively contributing to these national Carbon reduction targets.

National Planning Policy Guidance

In March 2014, the Government released the updated National Planning Policy Guidance (the Guidance). The Guidance provides information to local authorities on how to implement the policies of the NPPF and approach specific policy aims.

The guidance sets out how local authorities should include policies that protect the local environment and strategies to mitigate and adapt to climate change. It reiterates that local authorities should set sustainability policies for new development that are line with the Government's Zero Carbon Buildings

Policy and nationally described standards. It supports developments of good design that are functional and adaptable for the future.

Planning Considerations

Appearance

The Air Source Heat Pump is utilitarian in appearance, with an off-white metal finish, and a design which befits its function, similar to that of large air-conditioning. The structure will not appear incongruous within its setting and will not be visible from surrounding public vantage points. The benefits associated with the proposed air source heat pumps cannot be achieved without the structure and it is sited in the most suitable location within the site, away from residential receptors.

The proposals comply with Core Strategy Policy DM1.

Noise

The application is supported by a Plant Noise Impact Assessment, prepared by Noise Solutions Ltd. The report confirms that plant noise levels have been predicted at the nearest residential windows of St Stephens Court. The assessment shows that noise from the proposed plant will comply with the local authority's usual requirements and should therefore be acceptable.

Sustainable Development

The proposed development also meets all three of the objectives outlined in NPPF Para 8 which contribute to the achievement of sustainable development

Economic – the installation of the equipment will reduce the heating costs incurred at the property.

Social – the installation of the equipment will help support residents' health and social well-being through the provision of a warm environment in the winter and comfort cooling during the summer.

Environmental – the installation of the equipment will ensure the prudent use of natural resources, minimising waste and pollution and mitigating and adapting to climate change, including moving to a low carbon economy.

Conclusion

The development meets the requirements of the Development Plan and accords with the Government's commitment to help tackle climate change. The proposed ASHPs will provide a valuable contribution to cutting greenhouse gas emissions which accords with the objectives of NPPF para 158 (a).

The accompanying Plant Noise Impact Assessment confirms that there will be no harm to the amenities of nearby occupiers. On this basis and given the positive contribution to sustainable development in accordance with NPPF Para 8, it is considered that planning permission should be granted.

We would welcome a discussion concerning any additional details required in order to avoid the imposition of pre-commencement or other conditions precedent, to ensure that the development may proceed unhindered at the earliest opportunity following approval.

Yours faithfully



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