

Planning Application [23/06497/FUL](#) - 10 Seton Place EH9 2JT

OBJECTION from Grange Association

19 December 2023

We have reviewed this application for retrospective planning permission for an Air-Source Heat Pump (ASHP). In principle, this Association welcomes the installation of heat pumps where these facilitate the decommissioning of gas boilers that would otherwise be used to heat the property. However, such installations must be sympathetic to the conservation area and not create any material loss of amenity for neighbours.

Noise from ASHP

We object in this case because of the stated noise levels for the proposed ASHP. The ASHP is just 1m from the side boundary wall with the semi-detached neighbour at No 12 and the data sheet shows that the design noise level at that distance would be 52dB(A). This exceeds the guidance set out in the Microgeneration Certification Scheme ([MCS 020](#)), which requires that the noise measured at a residential property boundary should not exceed 42 dB(A). To achieve this with the proposed 12kW ASHP unit, it would need to be relocated at least 3m from the boundary, or have acoustic hoods installed to achieve the same effect.

We request that compliance with the noise standards of MCS 020 should be a condition of any planning consent, with an explicit criterion of a maximum 42dB(A) at the property boundary. This would ensure that any non-compliance, possibly arising as the equipment ages and becomes more worn, will be a breach of Planning Control and so could be addressed through an enforcement request with the possibility of enforcement action if non-compliance persists.

If the applicant cannot demonstrate that this criterion will be met under all equipment operating conditions, then the unit should be relocated and/or the design should be amended to incorporate acoustic hoods sufficient to meet it. In the absence of such relocation or redesign, we request that the application be refused.

Changes to plans for rear extension

The application form refers only to the siting of the ASHP. However, we note that the drawings supplied with this application contain some material changes from those approved as part of the earlier application [21/01123/FUL](#). Specifically, the rear elevation of the extension is shown in [23/06497/FUL](#) to be higher than approved and the southern outshoot is shown to be extended. The non-compliance with the roof height was reviewed as part of the determination of [23/00545/ENCOMP](#) where it was concluded that the unauthorised additional projection of the canopy was not material. However, this has never been formalised in a Non-Material Variation submission and so the extension as built does not match the approved drawings.

We would not wish changes such as these to be approved by stealth through drawings that are not referenced in the application and we request that the applicant be asked either to resubmit the drawings to be consistent with [21/01123/FUL](#) in all respects except the ASHP, or else to submit a request for a Non-Material Variation for the changes to the building extension.

**Grange Association
19 December 2023**