

Environment, Property and Recreation

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Debbie Baines
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Our Ref: TLC/TTC/VCS/1

Date: 19th April 2023

Dear Debbie

Air Source Heat Pumps at Tenterden Leisure Centre

Thank you for your letter dated 6th April 2023, outlining the Town Council's concerns in regard to the Air Source Heat Pump (ASHP) installations at Tenterden Leisure Centre.

As you have identified, planning application PA/2023/0101 was submitted for full planning permission and this application details the installation of 2 no. ASHP's, and a compound to enclose them.

Planning application PA/2023/0217 however, was not the phase 1 application as you have alluded to, but was a lawful development application for the current installation project. It was established that full planning permission was not required for the installation of the Photovoltaic (PV – solar panel) system or the ASHP's, as the Council has maintenance responsibility and liability for the area concerned. However, planning permission for 3 metre high fencing (some of which is acoustic barriers) is required. Therefore, an amended PA/2023/0101 was submitted, but this has not yet been reflected on the planning portal. Neither application require ENV10 compliance.

The Phase 1 project was in fact completed in 2022 and no permissions were required for these works other than building control consultation in regard to some internal works. The ASHP is within the lease demise of the centre. This was commissioned in May 2022, and commenced full time operation in August 2022. Until the new ASHP's were placed at the rear of the centre, the Council had not received any complaints in regard to the existing unit.

As per your concern, the key element for the current project is the location for the heat pump installation and the noise mitigation measures. As per the most recent sound impact assessment AS12473 dated 9th February 2023 which provides the location plan for the current installation, calculations were made using the original assessment for phase 1 that



was first carried out in April 2022. Both the original and most recent versions were provided to the Town Council by e-mail 3rd April 2023.

A further version of the impact assessment was provided by our principal contractor in September 2022, at which point it was intended to site the ASHP's in between the Leisure Centre and the bank of trees to the north façade of the building. It was at this point that the Council began seeking approval for locating the units, and this version was included in documentation provided to the Town Council 18th October 2022.

As previously communicated, the project underwent a significant change due to the original scheme involving the Leisure Centre, and another building. The overall scheme had to be reduced as double the amount granted by the Government towards the scheme would have been required. The Leisure Centre was the obvious site to remain the focus of the scheme based on the calculated carbon savings. Approval for this was received in November 2022, with final designs then completed. It was identified that the ASHP's would require to be closer to the heating plant to which they are to be connected. This is why a subsequent request was sent to the Town Council 24th January 2023 indicating the change in location and to request approval for the removal of trees.

As per the latest updated impact assessment, the relocation of the plant was deemed to have very little change from the phase 1 project, with an increase of 1 decibel at the Southern receptors. The decibel levels are within the required background noise limits - levels that would be difficult to achieve should a domestic heat pump be installed to a residential dwelling with little distance between neighbouring properties. The Government has set out its ambition to support the growth of the heat pump market to around 600,000 installations per year by 2028.

The original impact assessment was undertaken whilst major refurbishment works were being carried out to the Leisure Centre, during which the pool plant was not operating, whereby this would usually be running at all times. It was observed that background noise levels at night were very low at the time of the assessment.

All versions of the assessment have been scrutinised and approved by a Chartered Environmental Health Practitioner within Ashford Borough Council's Environmental Protection & Licensing team.

The Council have endeavoured to reduce energy consumption at the site, by installing variable speed drives to all of the motors within the plant which has enabled the motors to be slowed, and noise reduced as a result. The centre also has a Combined Heat & Power unit – a gas fired engine that generates electricity and uses the engine heat energy as primary heating system provision. This unit was switched off in February 2020 at the start of the COVID-19 pandemic, and has not been returned to operation since. Although slightly further away from the operational ASHP, this unit emitted higher decibel levels, and this was significantly audible within the rear car park area due to the exhaust flue being located on the side of the building over the existing compound.

The pool air handling unit has also been replaced, with a modern, efficient unit that is far quieter than originally installed – coupled with the high level of insulation within the new roof, this again has significantly reduced acoustic noise levels from the building.



Although full planning permissions have not been required for the ASHP installations, the Council have taken all responsible measures to comply with BS4142:2014 + A.1:2019, 'methods for rating and assessing industrial and commercial sound for commercial impacts' and the Ashford Borough Council 'Noise – Technical design note' Feb 2019.

It has been highlighted that the Council have carried out a similar ASHP installation at the Stour Centre, Ashford, and that the units have been enclosed. This is correct, 3 no. larger capacity ASHP's were installed, and these had a significantly higher noise level than the recent installations at Tenterden Leisure Centre. Combined with the requirement for 2 units to run at a time, the installation did not comply with BS4142:2014 + A.1:2019, so mitigation measures were taken to ensure that noise levels were brought within acceptable levels.

It is appreciated that the Town Council have shown support to the principle of the Public Sector Decarbonisation Schemes (PSDS) at the Leisure Centre. The grant funding was applied for as the gas fired plant at the centre is at end of life and in need of replacement. Given the Councils decarbonisation targets for 2030, the Council could not replace the plant "like for like" as this would not be environmentally and financially viable as a similar scheme would have to be undertaken within the next few years, with the entire project fee likely borne by the Council.

It has also been drawn to our attention that there is a concern in regard to a bat box that is located at high level above the area where the new ASHP's have been installed. As part of the recent re-roofing project, the Council consulted with Kent Wildlife Trust to ensure any disturbance to wildlife was kept within the parameters set out in The Conservation of Habitats and Species Regulations 2017 (as amended) which legally protects all bat species in the UK and further protection is afforded by the Wildlife and Countryside Act 1981 and the Countryside and Rights of Way Act 2000.

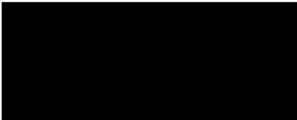
In July 2019, the UK Government published the revised National Planning Policy Framework (NPPF) which states that "opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity". Whilst no bat nesting spots were identified within the roof voids, it was recommended by KWT that bat boxes be installed and at their advised locations – recommendations that were followed by the Council. The KWT report recorded limited Pipistrelle foraging/commuting activity observed to the East of the building, and to the North façade and tree-line. Historic ecological surveys from June and August 2013 identified similar levels of pipistrelle activity within the pre-existing field along the trees and hedgerow border to the south of the building.

The particular roof section and directly behind where the heat pumps have been installed, was categorised as an "area of roof with low potential" for bats, whereby the North façade alongside the bank of trees is categorised as an "area of roof with moderate suitability". The ASHP's are in fact in the location that is the least intrusive to bat activity/occupation.

I hope that this provides assurance that impact from the scheme has been fully considered and mitigation measures taken accordingly.



Yours sincerely



Victoria Couper-Samways
Property Building Services & Facilities Manager

