

Development Management Team
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF



Dear Sir/Madam,

**Proposed Air Source Heat Pumps and Associated Works
St Marys CoE School, Brookpit Lane, Clymping, Littlehampton BN17 5QU**

On behalf of the Diocese of Chichester, I am pleased to submit a planning application for the installation of an air source heat pump (ASHP) system, with a capacity of 32kW, made up of 2 x 16kW Viessmann Vitocal 150-A units, that will supply both heat and hot water to St Mary's CoE Primary School, Clymping.

The scheme is supported by the following documents:

- Existing and Proposed Plans and Elevations;
- Design and Access Statement;
- Heat Pump Management Plan;
- Heat Pump Technical Guide;
- Sustainability Statement;
- Biodiversity Statement;
- Sound Assessment; and
- CIL Form.

The Site

St Mary's C of E Primary School is a small school, located to the south of the village of Clymping and the A259, outside of a built-up area.

The school was built in 1871 and was extended in 1992 and 2009. There is a playground and playing fields to the west of the school. A residential building is located to the east of the school; the remainder of the school is surrounded by fields. Access to the school is via Brookpit Lane, which is a country lane. There are expanses of open fields and meadows to the south, west and north, with occasional agricultural and residential buildings to the east.

The site is not within a conservation area. The Site is within Flood Zone 1.

The Project

St Mary's C of E Primary School located in Clymping, West Sussex, is part of the Diocese of Chichester. In line with Church of England net zero targets, the Diocese of Chichester are undertaking a heat decarbonisation project across two schools. A heat decarbonisation plan was prepared by Mantis Energy, which analysed energy use at St Mary's Primary School and assessed heat decarbonisation opportunities. Subsequently, ReEnergise supported the Diocese of Chichester in making a grant application to Salix for funding via the Public Sector Decarbonisation Scheme (PSDS). This grant will help fund the installation of an air source heat pump (ASHP) system, along with improvements to roof insulation.

The initiative will reduce the school's reliance on fossil fuels for all its estate power and heat needs, thus eliminating greenhouse gas emissions (GHG) being emitted in the running of their estate. The decarbonisation plan includes the introduction of an air source heat pump system. This current proposal comes out of the implementation of that recommendation.

A description of the site, together with the key elements of the scheme, are provided in the Design and Access Statement that accompanies this application.

The Proposed Works

The development proposes the installation of an ASHP system. The outdoor heat pump units will be located to the east of the school building in a small courtyard, where one of the school's plant room is located, along with the oil tank.

The ASHP system is designed to have a capacity of 32 kW and will be made up of 2 x 16 kW Viessmann Vitocal 150-A units. The system will be plumbed directly into the existing distribution system, some of which will be upgraded. The school's existing oil boilers are to be removed as part of the project.

A timber acoustic fence will be installed along the eastern stone boundary wall of the courtyard where the proposed heat pumps will be located.

It is considered that this type of small-scale development, which will reduce reliance on fossil fuels, falls below the de minimis threshold. Furthermore, the area on which the heat pump will be located has a paved finish, with no biodiversity value. As such, the scheme will not impact on a priority habitat. Therefore, a Biodiversity Report is not required.

Planning Policy

● **National Planning Policy – National Planning Policy Framework (NPPF), 2024**

The NPPF, in Chapter 2 'Achieving Sustainable Development', sets out environmental objectives, including minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. At paragraph 10, it states "*So that sustainable development is pursued in a positive way, at the heart of the Framework is a **"presumption in favour of sustainable development"**.*"

Chapter 14, actively encourages renewable and low carbon energy infrastructure, and sets out the expectation that the planning system should support the transition to net zero by 2050.

Paragraph 166 states, *“In determining planning applications, local planning authorities should expect new development to:*

- a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and*
- b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.*

Paragraph 167 states, *“Local planning authorities should also give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights)”.*

Paragraph 168 is clear that in determining planning applications for renewable and low carbon development, local planning authorities should:

- a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal’s contribution to a net zero future; and*
- b) recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions.*

The proposal is completely in line with the aspirations of Paragraph 161, which supports community-led initiatives for renewable and low carbon energy.

● **Planning Practice Guidance (PPG) – Climate Change**

The Planning Practice Guidance (PPG) – Climate Change document addresses the role that the planning system can play in addressing climate change. Specifically, it refers to the importance of supporting the delivery of appropriately Sited green energy. Furthermore, it states that LPAs should ensure that protecting the local environment is properly considered when factoring in the broader issue of protecting the global environment.

It is noted that the PPG also reiterates that responding to climate change is central to the economic, social and environmental aspects of sustainable development.

Additionally, within this document, reference is made to the Climate Change Act of 2008, stating that it is required that Local Planning Authorities align with the goals set out within the Act, encouraging the adoption of proactive strategies to mitigate and adapt to climate change.

● **Planning Practice Guidance (PPG) – Renewable and Low Carbon Energy**

The Planning Practice Guidance (PPG) – Climate Change document states that planning has an important role in the delivery of new renewable and low carbon energy infrastructure, specifically stating that increasing the amount of energy from renewable sources is a key aspect in ensuring that the UK has a secure energy supply, as well as also slowing down the negative impacts of climate change and stimulating investment in new jobs and businesses.

It is further stated within this PPG that whilst all communities have the responsibility of helping to increase the use and supply of green energy, this responsibility does not override other considerations, such as environmental designations that may be affected as a result of a proposed development.

Whilst noting this, the Climate Change PPG raises the point that the UK has 10 legal commitments to cut greenhouse gases and meet increased energy demand from renewable sources.

- **Local Planning Policy**

At the local level, the statutory development plan in this area comprises the Arun Local Plan 2011-2032.

Arun Local Plan (2031)

Policy SD SP2: Built-up Area Boundary

The policy states that 'Built Up Area Boundaries' are defined for the main towns and villages in the District and shown on the Policies Maps. Development should be focused within the Built Up Area Boundaries and will be permitted, subject to consideration against other policies of this Local Plan.

Policy C SP1: Countryside

The policy states that outside the Built-Up Area Boundaries (as identified on the Policies Maps), land will be defined as countryside and will be recognised for its intrinsic character and beauty. Development will be permitted in the countryside where it is:

- a. for the operational needs of agriculture, horticulture, forestry, the extraction of minerals or the management of waste as part of a waste site allocation within the West Sussex Waste Local Plan; or
- b. for quiet, informal recreation; or
- c. for green infrastructure; or
- d. for the diversification of the rural economy; or
- e. for road and/or cycle schemes; or
- f. in accordance with other policies in the Plan which refer to a specific use or type of development.

The Council will take into account cumulative impact of development in the consideration of planning applications. To ensure better management of the rural-urban fringe in those areas where significant new development is proposed, early consideration will need to be given to landscape and biodiversity enhancement, woodland management, recreation provision and access routes.

Policy D DM1: Aspects of form and design quality

The Council will have regard to a number of aspects when considering planning applications, including character, appearance, impact, layout and scale.

Policy D SP1: Design

This policy expects development to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. Development proposals should have been derived from: a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity, adaptability, security, attractiveness, usability, health and wellbeing, climate change mitigation and habitats); and the influence these objectives have on the form of the development.

Policy EEC SP1: Adapting to Climate Change

The policy states that the Council will support development which is located and appropriately designed to adapt to impacts arising from climate change such as the increased probability of tidal and fluvial flooding; water stress; health impacts as a result of extreme temperatures and a decline in the quality of habitats and richness of biodiversity.

Policy ECC SP2: Energy and climate change mitigation

The policy is supportive of the installation of energy efficiency measures, stating that and where planning permission is required to retrofit energy efficiency measures into existing development, schemes will be permitted, subject to the Design and Built Heritage policies. In assessing the achievement of these standards the Council will consider: Site constraints; Technical viability; Financial viability; and Delivery of additional benefits. The aim of this policy is to ensure that all developments are designed to a high quality and positively enhance their location and setting.

Policy EEC DM1: Renewable Energy

The Council will support renewable energy development subject to a number of criteria. Schemes will be expected to contribute to the social, economic and environmental development and overall regeneration of the District.

Policy QE DM1: Noise Pollution

This policy sets out how the Council expects development proposals for new noise generating development to be supported by:

- a. Evidence to demonstrate that there are no suitable alternative locations for the development. 81 this may be assessed, where appropriate, using guidance in BS4142: 2014 Adoption Arun Local Plan 2011-2031 (July 2018) Arun District Council 243 21 Quality of the environment.
- b. A noise report which provides accurate information about the existing noise environment, and the likely impact of the proposed development upon the noise environment. The report must also demonstrate that the development meets appropriate national and local standards for noise, as set out in Annex 1 of the Planning Noise Advice Document: Sussex, and any mitigation measures required to ensure noise is managed to an acceptable level.
- c. Evidence to demonstrate that the development will not impact upon areas identified and valued for their tranquillity, including Gaps Between Settlements which are important to the enjoyment of Arun's countryside, its habitats and biodiversity.

Policy QU SP1 : Quality of the Environment

The policy is clear that the Council requires that all development contributes positively to the quality of the environment and will ensure that development does not have a significantly negative impact upon residential amenity, the natural environment or upon leisure and recreational activities enjoyed by residents and visitors to the District.

Principle of Development

National and Local Planning Policies actively promote sustainable energy measures such as the proposed on-site air source heat pumps.

The site is outside of the built up area boundary for which Local Plan Policy C SP1 states development is generally unacceptable, unless it falls into a certain category, or is otherwise in accordance with a Local Plan policy which refers to a specific use or type of development, or if it complies with another policy in the development plan. The proposals are required in connection with an established primary school that is a community asset. The works are modest in scale and would be well contained within the school boundary, towards the rear of the site, within an existing courtyard.

Renewable energy installations are supported by Policies EEC DM1: *Renewable energy* and ECC SP1: *Adapting to Climate Change, the supporting text of which states "The Council will support proposals which contribute to both mitigating and adapting to climate change and to meeting the national targets to reduce carbon emissions"*. The proposed heat pumps will enable the heat decarbonisation of the school, thereby reducing costs and increasing the efficiency and sustainability of the school accommodation for the existing pupils attending the school.

Sustainability

Local Plan Policies ECC SP2: *Energy and climate change mitigation* and EEC SP2: *Energy and climate change mitigation* support applications for renewable energy where they are suitably sited and screened and clearly associated with the buildings or properties they intend to serve, are appropriate in scale to the property being served and there is no unacceptable adverse impact on local amenity or conflict with public safety. The proposed heat pumps will be located within an existing courtyard within the school grounds, and as such will be well screened from public view. There will be no adverse impact upon the landscape character or the area. The proposal will decommission an existing gas-fired boiler and replace it, at least in part, with an energy-efficient air source heat pump (ASHP).

Design and Visual Impact

The proposed development would be appropriate in terms of scale, form, bulk, height, massing, spacing and design. The location of the heat pumps would minimise the visual impact, which would be very low in any case. Given the overall scale of the development when compared to the host building and its use, the proposal will be subservient and not incongruous within its setting. They will not be visible from the public realm, and there would be no adverse impact on the visual amenities of the street scene as a result of the proposal.

The proposals would therefore comply with Local Plan Policy D SP1: *Design*

Amenity

Taking into consideration the low-key scale of the proposals, the existing site circumstances, and the separation between the site and nearby dwellings, it is not considered that the proposed heat pumps would adversely affect the amenity of nearby residents by way of noise, loss of privacy, overbearing impact, noise, loss of sunlight or loss of daylight. The closest residential property to the proposed location of the ASHPs is

Amberley Court, which is 8m from the ASHP units at its nearest point. To reduce any noise impact on the neighbouring property, an acoustic panel timber fence is proposed to be installed to a height of 600mm above the wall. This, along with existing vegetation, will attenuate sound levels experienced by users of the property to a maximum of 32 dBA, which is below WHO guidelines.

Classrooms will not be impacted by the operation of the heat pumps as the areas of the school adjacent to the courtyard area are used for storage.

Biodiversity Net Gain

Due to the size and condition of the site (paved surface), the modest proposals are considered to be de minimis and are exempt from the requirement to provide Biodiversity Net Gain.

Conclusion

The proposals represent a modest scheme to provide a sustainable energy source to the school. It is our judgement that the proposals comply with the aims and objectives of the NPPF, as well as the Arun Local Plan and Neighbourhood Plan.

If you have any questions or require any further information, please do not hesitate to get in touch.

Kind regards,


Jayne Harding BA(Hons) BTP MRTPI

Aspect360 Ltd