

The Potting Barn
No.5 Hobbs Court
Bilsham Rd
Yapton
West Sussex BN18 OJY

June 6th 2025

**Planning Reference Y/32/25/PL Redrow Homes Ltd.
Application for 170 dwellings for Land West of Bilsham Rd.
Yapton West Sussex BN18 OLA.**

Further Objections to Y/32/25/PL ASHP Concerns

Dear Sir/ Madam,

1. Background of ASHP Concerns

a) It is an objection, that no investigation from any ADC department or Redrow Homes Ltd. has allegedly been undertaken regarding ASHPs and noise emissions, intended for the proposed application site earlier and now.

b) Concerns were first raised, in relation to accumulative noise from them, for terraced, semi-detached housing, and flats, by a public speaker at the ADC Planning Committee Meeting on Nov.15th 2023, to discuss the Boklok planning application for Y/52/23/PL. The same site as the Redrow Homes Ltd. application, under Y/32/25/PL in 2025.

c) During the discussions at the meeting which followed, Cllr. Billy Blanchard- Cooper advised that this matter would be investigated further. The Boklok application for Y/52/23/PL was refused at that meeting.

d) At a subsequent meeting on Dec 12th 2023 which was allegedly instigated to review the earlier objections by the Cllrs. from the

Nov.15th 2023 meeting, the ASHP objection was not on that agenda.

e) At the Gov. Appeal Review for the Boklok application on Dec. 10th 2024, ASHPs were mentioned. (The Inspector had already received a report on this, by Peter Rogers of Sustainable Acoustics Ltd. (member of the Institute of Acoustics) whose company had been commissioned by the Welsh Government to undertake an in depth review of ASHPs.

f) At the Appeal Review for Y/52/23/PL, the Inspector asked the ADC planning officer for their view regarding ASHP noise. The response was, 'That they were quiet'.

g) Neither any ADC department nor that of Redrow Homes Ltd., have allegedly produced evidential details to support that claim intervening. Nor in contradiction of the content of the Sustainable Acoustics Report, which considered all parameters, but did not confirm that all ASHPs were 'quiet'. Instead, explored aspects of 'noise' from them, their applications, and effects.

h) As both the Boklok and Redrow application proposals contain terraced and semi- detached dwellings/flats, the concerns about accumulative noise from ASHPs regarding them, are the same.

3. Redrow 'Sustainability Statement' April 2025.

a) **Item 5. 'Health and Wellbeing'** and indicated 'key measures' and stated, '*The party wall specification will reduce sound transmission between properties*'.

b) Unfortunately, such measures do not eliminate any detrimental noise from ASHPs through open /patio doors and windows, or from amenity space and gardens to properties, or those adjacent.

c) **Item 7, Energy Strategy** states, *'Every home will be fitted with low carbon air source heat pumps as standard. This allows each home to be labelled as 'zero carbon ready', from the point of occupation. The heat pumps were considered as feasible within the outline Energy Strategy'*.

d) Any decision to install ASHPs to the development was because it has been a statutory government requirement, that ALL new developments must install ASHPs from Jan. 2025.

e) 170 ASHPs in total, are allegedly intended to be installed, for every home on the site, without any tests to the appliances to confirm that they meet noise level standards for compliance as in their data sheets regarding noise output.

f) Assumptions without evidential independent test results on actual appliances, cannot be relied upon. As indicated in the Sustainable Acoustics Report which allegedly advised, that the 5 main suppliers of ASHP appliances did not only *not* meet the noise levels/standard quoted on their data sheets but *exceeded* them to detriment.

g) Pump noise for ASHPs can also alleged vary from manufacturer to manufacturer. Data sheets may also refer to a single static output, but the only way to be certain that actual noise levels advised are correct, is to test singly and accumulatively in situ.

h) It has been claimed by some, that complaints regarding noise from end users have been rare, but that is overall, not in relation to proximity housing, and the roll out effect is still in its infancy.

4. Electric Boilers and Comparison with other 'Sustainable' Heat Source as ASHP.

- a) It is necessary that all new development must show 'sustainability,' but that can take many forms otherwise.
- b) At present, in generality, many houses still have gas boilers. These are usually situated on a kitchen wall or in a cupboard with external vent. There is minimal 'noise' from them but are not considered 'green'.
- b) ELECTRIC BOILER installations allegedly perform with the same ultimate function as gas boilers and more importantly ASHPs. They can also heat an entire house and are also 'silent'.
- c) Comparisons on the internet between installation costs of ASHPs and Electric Boilers indicate that the costs of the latter are more favourable. Whatever form of electricity heating, usage costs are currently far higher than for gas. Electricity is generated in power stations. Some of which have been reported as using wood from protected trees.
- d) Internet details indicate that most of the ASHPs sold in the UK are allegedly made in China. By contrast, approx. 90% of Electric Boilers (and gas boilers) are made in the UK.
- e) 'Sustainability,' also relates to an appliance itself. It is difficult to reconcile the need for additional 'help to buy' for thousands of pounds as a persuader for ASHPs, when a replacement electric boiler needs no such incentive regarding cost of purchase or installation. The latter also being net Zero rated. Surely 'sustainability' should be the least expensive and least disruptive option for developments?
- f) Repair and replacement part costs for ASHPs? From personal experience very expensive. The appliance 'unsustainable' after 2 years when the guarantee ran out. The replacement fans lasted 2

weeks before failing again. The appliance was replaced with an alternative source. It is hoped that any newly installed ASHPs to a development will not require to be replaced by electric boilers for a similar reason after purchase in the future.

5. The Redrow 'Sustainable Acoustics' Report Response and Outcomes.

a) There have been several substantial reports on ASHPs by Peter Rogers of Sustainable Solutions Ltd. from 2022. One on Jan. 5th, 2024 and another on Jan. 9th 2025. All commissioned by the Welsh Government. Indicative, that matters regarding ASHPs and their noise emissions have not been resolved to satisfaction. Meanwhile installations allegedly continue without proper investigations.

b. Because previous concerns and objections raised to ADC regarding this matter had allegedly been ignored in outcome, alternative action was undertaken. My report and concerns were passed to Alison Griffiths, MP for Bognor Regis who took a proactive view.

c) She sent my report and details to the Government Department for Security and Net Zero in 2023 and 2024, (DESNZ). A department response was received from Dr. Miatta Fahnbulleh MP, acknowledging the forwarding of intentions to install ASHPs, but also that a review was ongoing. No reference was made to the physics of accumulative noise from ASHPs in her response.

d) Because the outcome was felt to be inconclusive, Alison Griffiths MP wrote again to DESNZ, this time including the Sustainable Acoustics Ltd. report and other details that had come to the fore intervening.

e) **The Rt. Honourable Lord Hunt of Kings Heath OBE, Senior Minister of State for the department of DESNZ replied to her on March 1st 2025.** (He resigned from the Government, on May 22nd this year).

f) In it was an email addressed to her, but to be passed to me personally. He acknowledged my concerns in general, relating to noise emissions, reiterated the current Gov. position, but declined to comment on the Sustainable Acoustics report, 'As it was not commissioned by the Government'. However, it was passed to the department otherwise for review.

g) I object that it was allegedly found necessary to go to the highest level of government in this regard, to ensure that real concerns regarding the rollout of ASHPs were recognised.

6.The Science That Has Yet To Be Resolved for the ASHPs and Developments

a) An ASHP is, by default, a 'noise' source. The noise is produced on a cyclic basis determined by the duty-cycle; when the compressor is operating to compress the refrigerant, it produces a constant "chugging" sound, and when this process ends, the fans cut-in and produce an intrusive "roaring" sound. When the fans switch off, the compressor cuts in again...and so it continues, by day and by night!

In larger properties it may also be necessary to include an immersion heater for hot water to get to an acceptable level for baths/showers.

b) In addition to individual ASHPs being an unwarranted noise source, the proximity of other/additional ASHPs adds to the noise floor. The sound level increases at a rate of 3dB for every doubling of the number of appliances.

c) While this does not sound significant, because it is a logarithmic scale, it is in fact a doubling of the perceived sound level. Two adjacent ASHPs produce +3dB, four adjacent ASHPs produce another 3dB, $3\text{dB} + 3\text{dB} = 6\text{dB}$ louder than just one ASHP.

d) An air source heat pump needs its own separate 32Amp fused spur, which is in excess of the 15Amp ring-main which supplies all other domestic appliances. An ASHP is not a 'plug-and-play' device. The outcomes from the difference in 'supply' details is obvious.

e) There are already potential concerns in objection for the site regarding alleged flooding, sewerage difficulties and lack of infrastructure.

f) Whether accepted or not, 'noise' from ASHPs is an 'issue'. Unless that and other outstanding matters are resolved before any development commences, it remains to be seen how saleable any properties are when completed.

g) May I respectfully suggest that if the application is approved an *independent* evaluation as a condition, is undertaken by ADC in consultation with experts from the Institute of Acoustics. To ensure that the noise values of single ASHP appliances are as on data sheets, and with reference to accumulative noise levels from appliances in situ.

Yours sincerely,

Dilys Lownsborough

From: Nicola Oktay on behalf of Planning.Responses
Sent: 09 June 2025 10:22
To: Planning Scanning
Subject: FW: Further objections to Y/32/25/PL ref ASHPs Redrow application
Attachments: Acumulative Noise from Air Source Heat Pumps Further Objection for y 32 25 PL.doc

REP – Accumulative Noise from Air Source Heat Pumps

Nikki Oktay
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From: [REDACTED]
Sent: 06 June 2025 13:52
To: Planning <Planning@arun.gov.uk>
Cc: Simon Davis <Simon.Davis@arun.gov.uk>
Subject: Further objections to Y/32/25/PL ref ASHPs Redrow application

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Dear Sir/ Madam
Please see as attachment objection ref ASHPs Redrow Application Y/32/25/PL

Kind Regards
Dilys Lownsborough