ASHP Practice Guidance Note (2026)
Consultation
IOA/CIEH

UK100 Submission

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This submission is from UK100 which is a network of 122 local authorities and the only network of ambitious councils led by all political parties working together to tackle climate change. We help local leaders overcome challenges and turn innovation into solutions that work everywhere. We build the case for the powers needed to make change happen. From cities to villages, we help communities across the UK create thriving places powered by clean energy – with fresh air to breathe, warm homes to live in, and a healthy natural environment.

UK100 in collaboration with Octopus Energy recently convened a sub-group of our members through a Task and Finish Group to explore acceleration of heat pump deployment locally. The group discussed regulatory and planning challenges, with a particular emphasis on noise and proposed solutions that will be shared in the form of a guide more widely towards the end of March. UK100 and our members would be happy to have further discussions about this proposed guidance with both organisations after the consultation closes.

Topic 1: The Criteria

The draft proposes new pathways for installations that require planning permission:

- PDR+ Where PDR is unavailable for non-acoustic reasons and no greater caution is needed, the installer may offer a calculation to the MCS 020a for consideration by the EHP.
- Level 1 Compliance with the 37 dB(A) limit demonstrated through appropriate calculations carried out by an SQA.
- Level 2 For use in exceptional circumstances only, e.g., tranquil areas, or multiple units with significant risk of cumulative impact. The BS 4142 methodology may be used to ensure the adverse impacts are minimised as far as reasonable.

As for compliance with PDR using MCS 020a, the 37 dB(A) incident sound pressure level limit shall apply 1 metre from the centre of a door or window to a habitable room.

3) Is the three level approach clear?

- **Yes**
- **No**
- **Unsure**

4) Any additional comments?

- Overall structure: The stepped approach is welcome, recognising that not all installations requiring planning permission present the same level of risk. A tiered framework can help decision-makers apply proportionate scrutiny while avoiding unnecessary delays or costs. Descriptions of each level should be clarified so councils, installers, and applicants understand how cases move between levels.
- Affordability and simplicity: Guidance should prioritise routes that minimise additional household costs. Many households considering a heat pump already face higher upfront costs than for fossil-fuel heating, so extra planning-related expenses could discourage them. Ensuring most cases can be resolved without costly specialist assessments will maintain momentum in the transition to clean heat.
- Avoid a “cliff edge”: Installations just outside the MCS020a calculator risk moving directly from a simple calculation to a complex assessment. An intermediate pathway would help marginal cases be resolved quickly and cost-effectively.

PDR+

- Retain the principle that compliant MCS020a calculations should normally suffice. Where an installation meets the noise calculation but requires planning permission for other reasons, the calculation should generally be accepted as adequate evidence. Requiring further noise analysis in such cases introduces unnecessary duplication and cost. Clear wording would help ensure this principle is applied consistently across all local authorities.
- Remove ambiguous language that could lead to inconsistent interpretation. Phrases suggesting “greater caution” may result in councils or officers applying different standards. More precise language ensures predictable and transparent decision-making.

Level 1

- Provide a proportionate pathway for marginal cases. Many installations narrowly fail the MCS020a calculation yet are unlikely to cause meaningful noise impacts in real conditions. Level 1 should allow these cases to be assessed pragmatically without automatically requiring complex acoustic studies.

- Ensure consistent guidance for acoustic modelling. If Level 1 involves detailed modelling, the guidance should define clear parameters and assumptions, reducing variation between assessments and aiding planning and Environmental Health teams in interpreting evidence.
- Enable lower-cost desktop assessments where appropriate. Using mapping tools, site imagery, or publicly available data can provide sufficient evidence while reducing time and cost.
- Preserve council discretion. Environmental Health practitioners and planners should retain the ability to approve installations where impacts are clearly minimal based on available evidence.
- Consider background noise. Where ambient sound levels already exceed predicted installation noise, a small MCS020a exceedance may have negligible practical impact. Guidance should allow this factor to inform Level 1 assessments.

Level 2

- Reserve complex assessments for genuinely sensitive contexts, such as very quiet environments or constrained sites. Limiting detailed methodologies to these circumstances ensures proportionate scrutiny and focuses specialist resources where needed.
- Avoid automatic escalation for multiple units. The presence of more than one heat pump should not automatically trigger the most complex assessment. A case-by-case approach, starting with Level 1, is more proportionate.

Consistency and decision-making across councils

- Improve clarity to reduce variation between authorities. Heat pump applications often involve multiple council teams, and differences in workflows or evidence expectations can create inconsistent outcomes. Clearer national guidance provides greater certainty for applicants.
- Support planners and Environmental Health teams with practical guidance. Shared tools and interpretation frameworks help ensure consistent, proportionate application while maintaining protections for residents and local environments.

7) The Level 2 assessment is currently suggested for "exceptional circumstances," such as tranquil areas. It could also be used for installations in louder areas, where a specific sound level higher than 37 dB(A) might be justifiable. Do you agree with this approach?

- **No**

8) Any additional comments?

- **Support reserving Level 2 for genuinely sensitive environments:** Using the most detailed assessment pathway in locations where quiet conditions are a defining characteristic is a reasonable safeguard. Level 2 should

therefore remain available for situations where there is a credible risk of disproportionate impact.

- **Define "tranquil areas" more clearly to avoid overuse:** If the framework refers to tranquil or particularly quiet environments, it should also provide clearer guidance on how these are identified. Without clearer parameters, there is a risk that authorities may interpret the category differently, which could lead to more frequent requests for complex assessments than intended. Clearer criteria would help ensure this pathway remains limited to genuinely exceptional cases. "Tranquil areas" if not defined correctly, may risk also covering more rural and sparsely populated areas, where background noise levels are low, but the risk of any noise disturbance would be low near the proposed installation.
- **Avoid using Level 2 routinely in louder environments:** Applying the most complex assessment methodology in locations with higher background noise levels may not always be proportionate. In many urban or transport-influenced areas, the existing ambient sound environment already exceeds the levels associated with typical heat pump operation. In these situations, it is less likely that the additional noise from a single installation would be perceptible or harmful.
- **Maintain a balance between deployment speed and environmental protection:** A key objective of the framework should be to enable rapid and widespread adoption of low-carbon heating while safeguarding communities and local environments. Ensuring that the most resource-intensive assessments are reserved for genuinely sensitive circumstances will help keep the planning process efficient for the majority of households considering a heat pump installation.

Topic 3: Cumulative Impact

The draft states that multiple ASHPs are unlikely to result in adverse cumulative impact for typical residential situations such as groups of semi-detached and terraced houses. Adverse impact from cumulative noise may occur in areas of dense housing such as courtyards.

11) Do you have any suggestions to address cumulative impact in high-density housing without the guidance becoming excessively onerous?

- **Unsure**

12) Any additional comments?

- **Cumulative noise from multiple heat pumps should be addressed clearly in the guidance:** It is good to see the guidance stating that multiple ASHPs are unlikely to cause cumulative noise impacts in some scenarios. Evidence from Nesta (Air source heat pump cumulative noise impact and Heat pumps: a user survey) suggests that the cumulative impact of multiple air source heat pumps (ASHPs) is unlikely to create significant noise issues in typical residential contexts. Including a clear

reference to this evidence within the guidance would help reassure decision-makers and reduce unnecessary escalation to complex assessments.

- **Avoid language that introduces uncertainty without guidance:** Statements highlighting potential risks without explaining how practitioners should respond can unintentionally create hesitation in decision-making. For example, general warnings about higher caution in dense housing environments may encourage more conservative interpretations by planning authorities. Clearer guidance on when additional assessment is actually required would help avoid unnecessary delays.
- **Recognise that cumulative noise is a known concern for councils:** Concerns about the cumulative impact of multiple installations were raised by several local authorities participating in UK100's heat pump task-and-finish group. Officers highlighted uncertainty about how to assess situations such as blocks of flats where several units might eventually be installed. This reflects the wider challenge identified in the project of inconsistent interpretation of noise risks across planning authorities.

Topic 4: Planning Conditions

The draft provides two example planning conditions for both Level 1 (fixed limit) and Level 2 (rating level relative to background sound level).

13) Are the example planning conditions suitable?

- **Unsure**

14) Any additional comments?

- **Conditions should remain simple and used only where necessary:** We welcome the statements around planning conditions should typically not be necessary and where they are, should be kept simple. Planning conditions should be applied sparingly and only where there is a clear justification as this will help avoid unnecessary administrative burden for both councils and applicants. Ensuring that conditions are straightforward and proportionate will help maintain confidence in the planning system while supporting the wider rollout of low-carbon heating.
- **Ensure conditions do not become a substitute for quality assurance:** Local authorities participating in UK100's heat pump task-and-finish group highlighted a broader concern that planning is sometimes being used to manage risks associated with installation, subsequent use and installation quality. However, once a planning condition is discharged, planning authorities have limited ability to influence ongoing performance or maintenance. For this reason, quality assurance should primarily be addressed through installer standards, commissioning practices and other

regulatory frameworks rather than through increasingly complex planning conditions.

- **Provide clearer guidance on when conditions are appropriate:** Councils would benefit from clearer national guidance on when a condition is likely to be necessary and when it is not. Without this clarity, different authorities may apply conditions inconsistently, contributing to the variation in decision-making that many councils have reported. Greater consistency would help reduce uncertainty for installers and householders and support faster decision-making.
- **Provide additional guidance for listed buildings and heritage contexts:** There may be merit in including additional guidance on the use of planning conditions in heritage contexts, particularly for listed buildings. Evidence from organisations such as Historic England and Grosvenor Group has highlighted that planning complexity can be a barrier to introducing low-carbon heating in historic properties. Where a proposal can demonstrate compliance with the relevant noise limits but requires permission because the building is listed, the guidance could clarify that approval should normally be supported provided that relevant consents and permissions have been secured.

Part B: Potential Additional Pathways

The working group has identified several "intermediate" options that are not currently in the draft but could significantly reduce the number of applications requiring complex Level 2 assessments. We welcome your views on whether these should be included.

Topic 5: Day/Night Operational Limits

The Level 1 proposal applies a single 37 dB(A) limit for all daytime and night time periods. However, many modern units feature "Quiet Modes" that allow them to operate more quietly at night, while potentially running louder during the day. This is standard practice in many European countries, where domestic daytime sound level limits are typically 45 or 50 dB(A). It is also common across Scotland to have fixed thresholds for sound impact. "Quiet mode" typically means that heating capacity is limited during the night, but thermal efficiency is not necessarily compromised.

15) Should the guidance introduce a split day/night limit (e.g., 42 dB(A) day / 37 dB(A) night)? This would allow units to run at higher duties during the day when background noise is higher and use 'quiet mode' at night, provided they meet the strict criteria at night.

- **Yes**

16) Any additional comments?

- **A split limit could provide useful flexibility for installers and households:** Allowing a slightly higher limit during daytime hours could help systems operate more efficiently when background noise levels are typically higher. This flexibility may reduce the need for complex design work or costly mitigation measures while still ensuring that quieter operation is maintained at night. Introducing this option within Level 1 could therefore support a more proportionate and practical planning pathway. Where a system is not operated in quiet mode at night or does create a disturbance, local authorities already have mechanisms to respond through established environmental health or statutory nuisance procedures.
- **Maintain a range of lower-cost compliance options within Level 1:** Providing multiple compliance routes within the intermediate tier would help keep planning processes affordable for applicants. Many installations only marginally exceed simplified thresholds, and a basket of practical options could help resolve these cases without escalating to more complex or expensive assessments. This approach would support wider uptake by reducing uncertainty and unnecessary cost barriers.
- **Noise complaints from heat pumps appear to be very rare:** Available evidence suggests that complaints relating specifically to heat pump noise are uncommon compared with other household noise sources. A study by Saga Home Insurance using freedom of information requests to councils found relatively few recorded complaints over a ten-year period. This has been backed up by our own conversations with the industry, other stakeholders and our own members.
- **Monitoring will be important as deployment grows:** Although current complaint levels appear low, heat pump installations are expected to increase significantly in the coming years. As uptake grows, it would be helpful for councils to record and categorise noise complaints more systematically so that any emerging trends can be identified early. This would allow future guidance to be updated if evidence shows a need for further safeguards or indeed provide the more substantive evidence that heat pumps are not a major cause of noise disturbance.

Topic 6: Context-Specific Thresholds (The "Level 1" Approach)

In urban centres or near busy roads, a fixed limit of 37 dB(A) may be unnecessarily restrictive if the existing background noise is already significantly higher, in night time or daytime periods. A desktop assessment could be based on national noise maps and a statistical relationship between LAeq and LA90, or on other noise surveys on the planning database, for example. This would permit ASHP emissions up to a higher cap provided they remain below the existing background sound level.

17) Should the guidance for Level 1 include an option for higher-noise areas be explored by the working group?

- **Yes**

18) Any additional comments?

- **Allow proportionate thresholds in areas with higher background noise:** In locations where ambient noise levels are already elevated such as urban centres or areas close to major transport infrastructure, a fixed threshold may not always reflect real-world conditions. Allowing installations to operate below the prevailing background noise level could provide a more proportionate approach to managing potential impacts. This would help avoid unnecessary restrictions where the additional sound from a heat pump is unlikely to be perceptible.
- **Enable practical assessments without requiring costly specialist input:** It should be possible to rely on readily available information such as national noise maps, existing environmental assessments, or relevant planning database records. Allowing this type of desktop-based evidence could help councils and applicants resolve cases more efficiently. This would reduce the need for specialist acoustic assessments in situations where impacts are clearly minimal.
- **Area-based approaches could also support contextual decision-making:** Some councils participating in UK100's heat pump task-and-finish group discussed the potential value of area-based mechanisms, such as targeted planning frameworks or simplified approval routes, for common housing types or locations with well-understood noise conditions. For example, approaches similar to Local Development Orders could help reduce repeated case-by-case assessments in certain neighbourhoods. However, local authorities also highlighted that developing these mechanisms requires time, technical input and resources that many councils currently lack.

Topic 7: Certainty for Level 2 Assessments

Where a full BS 4142 assessment is required, the current draft relies on professional judgement to ensure impacts are minimised.

19) To provide certainty, should the guidance define the acceptable level of noise intrusion? For example, explicitly stating that if the rating level does not exceed the background sound level ($L_{Ar,Tr} \leq L_{A90}$), planning permission should be granted.

- **Yes**

20) Any additional comments?

- **Use detailed acoustic assessments only in genuinely exceptional cases:** The BS 4142 methodology was intended to assess industrial and commercial noise sources. Applying it routinely to small-scale domestic heat pump installations risks introducing disproportionate cost and complexity for applicants. For this reason, its use should remain limited to

situations where there is a clear and credible risk of significant noise impact.

- **Avoid creating unnecessary cost barriers for households:** A full BS 4142 assessment can add significant expense on top of planning application fees and other installation costs. For households already navigating the higher upfront costs associated with low-carbon heating, this additional burden may discourage otherwise willing adopters. Keeping this pathway as a last resort will help ensure the planning framework supports, rather than slows, the wider rollout of heat pumps.
- **Support consistent interpretation across planning and environmental health teams:** Local authorities participating in UK100's heat pump task-and-finish group noted that uncertainty around evidence thresholds and acoustic methodologies can contribute to inconsistent decision-making and can slow the determination process. Clear national guidance on how Level 2 assessments should be interpreted would therefore help support more consistent and timely decisions.

Part C: Any Other Comments

21) Do you have any other comments regarding the draft guidance or the assessment pathways?

- **Support clear, practical guidance that enables heat pump deployment at scale:** Given the urgency of decarbonising home heating, clear guidance from professional bodies such as Chartered Institute of Environmental Health and Institute of Acoustics is essential to support confident and consistent decision-making. We welcome the effort to update this guidance and encourage the authors to ensure it remains concise, practical and easy for practitioners to apply. As further evidence becomes available, the guidance should also be reviewed periodically so that it reflects the latest research and real-world experience.
- **Maintain a proportionate balance between rollout and noise protection:** The framework should continue to strike a balance between enabling the rapid uptake of heat pumps and protecting residents from genuine noise nuisance. In practice, this means ensuring that safeguards are targeted where they are genuinely needed while avoiding unnecessary procedural barriers. A proportionate approach will help support the scale and pace of deployment required for the UK's climate commitments.
- **Provide clearer pathways within the intermediate assessment stage:** While the proposed framework introduces a more proportionate structure, further clarity would help ensure it works consistently in practice. In particular, the Level 1 pathway could benefit from clearer guidance outlining a range of low-cost assessment options that applicants and councils can use before escalating to more complex methods. Establishing a defined "basket" of proportionate approaches would help reduce

uncertainty and ensure similar cases are treated consistently across different authorities.

- **Support local authorities with templates and guidance:** Local authorities will play a central role in applying this guidance through planning and environmental health functions. Councils participating in UK100's work on heat pump deployment have highlighted the importance of clear national guidance to help manage workloads, reduce uncertainty and support consistent decision-making. Ensuring the guidance is straightforward to interpret and apply will be critical to enabling councils to facilitate heat pump deployment efficiently. UK100 and our members would be keen to be involved in this work in the future.