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## Response to 'beta test' of NPPG – Noise

### 1. **The guidance is welcomed.**

- It is accessible guidance with community facing language (this should help restore local community confidence in planning process as part of the localism agenda).
- Noise exposure hierarchy provides further guidance to Gov't noise policy (as set out in NPSE) with exposure descriptions that will be accessible to communities with the structure to link to objective threshold levels and ability to respond to local and project context; the addition of the Unacceptable Adverse Effect Level is valuable.
- The noise control hierarchy is helpful and will continue to help secure good design (but perhaps not 'better design' as targeted by the Taylor review).
- Reinforcement that noise is important but needs to be considered as part of sustainable development objectives.
- The guidance is applied to construction as well as operational sources.

### 2. **Suggested modification before publishing the final NPPG** – noise:

- NPPG-noise should be published as a single, printable document with clear version control (to provide evidence Public Inquiries, for example).
- The links to further guidance (e.g. standards) should be checked and completed; further the relevance and value of the further guidance provided should be checked (e.g. "guidance on design") such that the opportunity for successful and efficient outcomes is not lost. The "alternative means of ventilation" should also refer to "guidance on design" as well as Building Regs. The guidance on design should set out the approach to achieving the 'better design' targeted by the Taylor review and sustainable design.
- Further explanation / clarification of some newer terms used would reduce the risk of inconsistent application of the guidance (this could be dealt with by providing an updated glossary); e.g.
  - "*such as keeping windows closed for most of the time*" – examples would assist considering sources with different durations; e.g. occasional events such as sports events and continuous sources;
  - *On matters such as "changes in behaviour and attitude"* it would be helpful to note that these are generally to be considered on the basis of 'community norms' whilst also taking account of any local context?
  - *At exposure between LOAEL and SOAEL what is the intended by "potential for non-awakening sleep disturbance"; self-reported?*
  - What's the difference in policy terms between the use of the terms "*avoid*" and "*prevent*" (in regard to SOAELs and Unacceptable Adverse Effect Levels)?
  - What is meant by a "good standard of amenity"?

- Good practice technical guidance for the assessment of tranquillity should be provided. It is recommended that an aim to identify and protect good quality and vibrant acoustic environments (not necessarily quiet environments) should be included.
3. **Need for quantitative technical guidance** (framework of noise threshold dB values to align with the noise exposure hierarchy in the NPPG). The absence of any quantitative guidance could put at risk efficient planning and consistent decision taking. This could present a material risk to Government's aim for development, particularly housing growth. The Taylor review recognises the value of industry best practice guidance in this regard. The ANC sees the opportunity for joint authorship of best practice by professional bodies representing the interests of industry and local government (this has been successfully achieved previously for the guidance in controlling noise nuisance from pop concerts). The ANC would be keen to explore opportunities to incentivise co-authorship (e.g. collective funding and / or Government recognition of co-authored good practice guidance. An independent registration scheme for good practice may be another option.

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14 October 2013