

Sangeeta Sofat
Review of Planning Practice Guidance
Department for Communities and Local Government
1/J1 Eland House, Bressenden Place,
London SW1E 5DU

15 February 2013

Dear Ms Sofat

I am writing on behalf of the Association of Noise Consultants (ANC), with regard to consultation on External **Review of Government Planning Practice Guidance** (December 2012) and the recommendations contained therein. This response follows the ANC's initial response sent 30 November 2012

The ANC is a trade association for acoustic, noise and vibration consultancy practices in the UK – you can see our web site at <http://www.association-of-noise-consultants.co.uk/>. Membership has grown to over 116 member companies, including several international members and representing nearly eight hundred consultants. Established in 1973, the ANC seeks to raise the standards of acoustic consultancy and improve recognition of the vital role which good acoustics, and the management and mitigation of noise and vibration play in achieving good design and effective planning in the built and natural environment.

The ANC recognise that proper application of the noise elements of NPPF within the context of government policy on sustainable development should lead to good acoustic design and positive outcomes, ensuring that noise is considered alongside other relevant issues and not being considered in isolation. However, the ANC is concerned that the policies expressed in the NPPF will not be sufficiently addressed or could otherwise be seriously undermined unless Developers and Local Planning Authorities are given further guidance and support on:

- guidance on use and interpretation of the plethora of technical standards, guidelines and research on noise and vibration levels and dose responses which could be used to achieve the general aims contained within the NPPF, and
- best practice guidance on the design and control of new development so as to avoid and minimise significant adverse impacts from new development.

The ANC would be pleased to support the Government in the development and preparation of new guidance on planning and noise and would be happy to collaborate with the DCLG and private and public sector organisations to establish the gaps in technical guidance and help to draft advice to fill those gaps. also to provide good practice case studies where we believe our members have a a substantial body of experience that could be called upon.

We now turn to the specific matters raised in the consultation.

1. **Do you agree with the proposed recommendations for a much reduced set of essential practice guidance in the format recommended? (Recommendations 1, 2, 3, 5, 6)** – We strongly agree with the recommendation to prepare and maintain guidance on planning and noise to assist Local Planning Authorities in the preparation of local plans and to provide overarching principles of development control. We would also recommend that technical guidance on impact assessment, acoustic design standards and other relevant technical guidance is separated from general guidance on policy. The Association of Noise Consultants is ready to partner with other interested parties in the production of technical advice. However, the ANC is firmly of the view that Government should show leadership endorse technical guidance prepared by professional bodies where it is appropriate to do so, rather than providing signposts to such guidance.

- 2. Do you agree that standards for future Government Planning Practice Guidance should be implemented by the Chief Planner in DCLG, but with decisions on what to include within guidance still taken by Ministers? (Recommendation 4)** - We agree that the Chief Planner in DCLG should co-ordinate input from other Government Departments and act as the overall custodian of the suite of planning guidance and always with due regard to the Government's Noise Policy (as set out in the Noise Policy Statement for England 2010). We also recommend that robust mechanisms are developed and implemented to ensure that guidance on noise- especially in relation to matters relating to health and quality of life- are evidence based and that scientific evidence is used responsibly.
- 3. While access to all planning guidance online will be free of charge, do you think it would be appropriate to offer planning professionals an additional service involving immediate notification of every revision to the guidance, and to make a small charge for this service? (Recommendation 6)** No comment.
- 4. Do you agree that the new web based resource should be clearly identified as the unique source of Government Planning Practice Guidance? (Recommendations 7-9)** Yes. However, with regard to recommendation 9, we regard it as essential that the Government endorse specific documents rather than simply sign post the availability of such guidance. Otherwise there is a real risk that uncertainty and risk for developers and communities alike will increase, hold-ups and interruption to the planning system will become more frequent, and planning decisions may become inconsistent (and therefore challengeable).
- 5. Do you agree with the recommended timescales for cancellation of guidance and new/revised guidance being put in place? (Recommendations 10-13)** The suggested schedule for generating the further guidance on noise, vibration and tranquillity is ambitious and we are concerned that in order to meet this schedule any such advice will not adequately address the issues, especially as further explanation of policy is needed as well as technical advice. For example the NPPF contains welcome new policies on the protection of areas of tranquillity and that this is a policy area that is not addressed in any current planning policy documents or established sources of guidance that can be readily co-opted. We don't think that the time scale for generating further guidance needs lengthy extension; autumn this year would be a suitable aspiration for generation of suitably streamlined advice. We ask that consideration also be given to what guidance can be provided in the interim.
- 6. Do you agree with the recommendations for cancellation of existing guidance documents? Are there specific, essential elements of current guidance material that should in your view be retained and considered for inclusion in the revised guidance set? (Recommendations 14 - 16)**. The ANC agrees that it is vital that new up to date guidance endorsed by government and incorporating the latest technical advice is provided to support the Government's Noise Policy and the NPPF. Provision of some form of guidance should be considered in the period whilst new guidance is prepared. One option might be to use the technical appendices from the previous advice in PPG 24 temporarily retained as critical advice similar to those listed in Appendix C of your report; until new technical advice is released.
- 7. Do you agree with the recommended priority list for new/revised guidance? (Recommendations 17-18)** - Yes, and we are pleased to see noise included in the list of policy areas where a gap has been recognised in recommendation 17, and referred for closing in Appendix D.
- 8. Are there any further points you would like to make in response to the Review Group's Report? Do you have additional ideas to improve and/or streamline planning practice guidance?** Subject to appropriate safeguards on resource expenditure and with government support and endorsement of the outcome, the ANC would be happy to assist, and work collaboratively with other organisations (e.g. IoA, CIEH and RTPI) to assist the development of suitably improved and streamlined planning and noise technical good practice guidance in regard to enhancement and encouragement of the positive aspects of sound e.g. quiet areas, and the appropriate control and mitigation of the negative aspects of noise and vibration e.g. noise sensitive and noise generating development. We believe that the ANC is well placed to provide good practice case studies as envisaged in your report.

Yours sincerely

Dani Fiumicelli
Working Group Chairman