



Department for Levelling up Housing and Communities

Consultation on additional flexibilities to support housing delivery, the agricultural sector, businesses, high streets and open prisons and a call for evidence on nature based solutions, farm efficiency projects and diversification

Response from the Institute of Acoustics

Background

The Institute of Acoustics (IOA) is the UK's professional organisation for those working in the fields of sound, noise and vibration. Many members of the Institute are involved in implementing the Government policies on noise management and addressing the issues concerning noise affecting new dwellings.

This response has been prepared by experienced members of the Institute and has been approved by the IOA's Executive Committee on behalf of the IOA's Governing Council.

The response is confined to comments on areas where the changes proposed will affect the effective management of noise.

Introduction

The IOA has stated for many years that any permitted development that can affect or be affected by the sound environment is not a good idea as it can lead to poor or ineffective noise management. In the case of allowing the conversion of existing spaces which had a previous use to new dwellings, this can lead to adverse or significant adverse effects from noise being experienced by the new residents. In some cases, this can also lead to complaints about the noise affecting them, giving rise to the associated costs of investigation and remediation. These issues can be avoided by an appropriate assessment of the potential noise impacts occurring at the time of the change of use.

This concern has been validated over the years as the Government has had to adjust the rules relating to, for example, the permitted development of offices to residential, in order for noise from certain existing sources to be addressed by the prior approval process.

Comments

Given the above comments, the Institute welcomes the maintenance of the prior approval process relating to the impact of noise from commercial premises as part of the permitted development rights for new dwellings.

Having said that, what continues to be missing from the process is consideration of existing, non-commercial noise sources such as from transportation, which can affect the development. High Streets and tourist thoroughfares can be heavily trafficked – both from vehicles and footfall - and generate a lot of noise. If permitted development rights are applied so that existing premises can be converted to dwellings without proper consideration of these types of noise



source, the health and quality of life of the new residents could be adversely affected, resulting in poor quality homes as well as attracting the associated economic costs of these adverse effects.

The Institute urges the Government to extend the prior approval process to cover all noise sources that can affect the new dwellings so that appropriate mitigation can be identified and implemented in order to meet the requirements of the Government's policy on noise.

The recent report from the House of Lords Science and Technology committee¹ recognised the adverse health effects that can be caused by noise exposure. Allowing this policy to be implemented without all the potential noise impacts being properly addressed would mean that the Government's overall noise policy requiring effective noise management would not occur.

The Institute completely recognises the need for more dwellings, but cannot support these permitted development policies unless the potential noise impact from all sources is covered by the prior approval process.

Conclusion

The IOA hopes that the Government finds these brief but very important comments helpful. The Institute would be happy to discuss with officials any of the points made if that would be helpful.

Institute of Acoustics

25th September 2023

¹ <https://committees.parliament.uk/committee/193/science-and-technology-committee-lords/publications/>