



## **The Institute of Acoustics Response to the Proposed Reforms to the National Planning Policy Framework (NPPF)**

### **Introduction**

The Institute of Acoustics (IOA) is the UK's professional body for those working in acoustics, sound, noise and vibration. The IOA has some 3000 members from diverse backgrounds, with engineers, scientists, educators, lawyers, occupational hygienists, architects and environmental health practitioners among their number. This multidisciplinary culture provides a productive environment for cross-fertilisation of ideas and initiatives. The range of interests of members within the world of acoustics is equally wide, embracing such aspects as aerodynamics, architectural acoustics, building acoustics, electroacoustics, engineering dynamics, noise and vibration, hearing, speech, underwater acoustics, together with a variety of environmental aspects.

Many members of the IOA regularly carry out noise impact assessments that contribute to the planning process in England. Therefore any proposed changes to the NPPF could directly affect the work of our membership both as consultants assisting developers with their planning applications and as regulators evaluating proposals.

### **Background**

The assessment of the potential noise impact of any development proposal has been an integral part of the UK and England planning system for at least 50 years. The reason is, of course, that exposure to noise can cause adverse health effects in the form of annoyance and sleep disturbance. It is also now known that long term exposure to environmental noise can cause direct health effects such as cardio-vascular disease. The report from the House of Lords Science and Technology Committee, published last year, recognised these effects.<sup>1</sup> Therefore, it is essential that the planning process requires that noise is properly managed.

### **General**

The Government's policy for managing noise is set out in the Noise Policy Statement for England, which was published in 2010 under the previous Labour administration. It provides an excellent overarching policy under which detailed noise management policies for specific areas of activity can be developed. The IOA is delighted that there are no proposals to change the main noise management policies within the NPPF (found in paragraphs 180(l), 191(a), 191 (b) and 193 of the consultation version). This continuity is extremely helpful in enabling practitioners to address the issue of noise management efficiently and effectively.

### **Response to Specific Proposed Reforms**

Many of the proposed reforms concern addressing the need for society to build more homes and decarbonise how they are heated, in the Government's pursuit of its net zero objectives. The IOA supports this overall aim. The means of achieving this goal is to set up mechanisms for more land to become available for new housing development. However, such land very often will be affected by existing noise sources which must be taken into account if the noise impact is to be effectively managed and good quality homes built, with external areas created that are conducive to the improvement of health and quality of life.

The NPPF seems to rely on the implementation of the National Design Guide and the National Model Design Code (NMDC) to achieve good quality housing. In the NMDC, there is a very limited reference to noise, with one mention in the Part One document<sup>2</sup>, and eight references in the Part Two

---

<sup>1</sup> <https://committees.parliament.uk/publications/40937/documents/199438/default/>

<sup>2</sup> On page 31 suggesting that the presence of street trees mitigate noise.



Guidance Notes focusing mainly on the phrase ‘noise mitigation’. This has unfortunately perpetuated the apparent lack of priority given to the effective management of noise as a pollutant. (Government will recall that, last year, the House of Lords Science and Technology Committee described noise as a ‘neglected pollutant’<sup>3</sup>).

When it comes to new housing developments, the means used for managing the effects of external noise has mainly been limited to enhancing the sound insulation provided by the building façade (e.g. in the form of secondary or triple glazing). However, such an approach is becoming more complex as the understanding of ventilation needs has increased with the requirements in the Building Regulations Approved Document F to be taken into account, and more recently the need to integrate the prevention of overheating, to adapt to a warming climate, through implementing Building Regulations Approved Document O.

Consequently, it is no longer the case that the noise issues associated with new dwellings can be addressed by identifying suitable façade sound insulation. Instead, it has become even more important to apply the principles of Good Acoustic Design to enable good quality homes to be built without always having to resort to façade sound insulation to avoid significant adverse effects or minimise adverse effects as required by paragraph 191 (a) in the NPPF.

In the Government’s Planning Practice Guidance on Noise, at Paragraph 014, one of the documents “published by other organisations [which] may be of assistance” is:

“ProPG ; Planning & Noise – Professional Practice Guidance on Planning and Noise – New Residential Development”<sup>4</sup>.

This document was published jointly by the Institute of Acoustics, the Association of Noise Consultants and the Chartered Institute of Environmental Health.

Supplementary Document 2<sup>5</sup> of the ProPG deals with Good Acoustic Design. It recommends that the following hierarchy of noise management measures should be applied to new residential development, in descending order of preference:

- i. *Maximising the spatial separation of noise source(s) and receptor(s).*
- ii. *Investigating the necessity and feasibility of reducing existing noise levels and relocating existing noise sources.*
- iii. *Using existing topography and existing structures (that are likely to last the expected life of the noise-sensitive scheme) to screen the proposed development site from significant sources of noise.*
- iv. *Incorporating noise barriers as part of the scheme to screen the proposed development site from significant sources of noise.*
- v. *Using the layout of the scheme to reduce noise propagation across the site.*
- vi. *Using the orientation of buildings to reduce the noise exposure of noise sensitive rooms.*
- vii. *Using the building envelope to mitigate noise to acceptable<sup>6</sup> levels.*

It can be seen that noise mitigation in the form of enhancing the insulation of the building envelope (façade) is the last option. At the moment, developers tend to regard it as the first (and only) option, and to an extent this view is reinforced by the NMDC. In the view of the Institute, this is an outdated approach, in light of this well-established guidance.

<sup>3</sup> <https://committees.parliament.uk/publications/40937/documents/199438/default/>

<sup>4</sup> <https://www.ioa.org.uk/sites/default/files/14720%20ProPG%20Main%20Document.pdf>

<sup>5</sup> <https://www.ioa.org.uk/sites/default/files/14720%20ProPG%20Supplementary%202.pdf>

<sup>6</sup> Shorthand for meeting the requirements of Paragraph 191(a) of the NPPF



To achieve the Government's goal of increasing house building but securing good quality healthy homes, the IOA would urge that this update of the NPPF includes a clear reference to these principles of Good Acoustic Design. Not to do so, would risk poorer quality homes being built with the consequential adverse health and quality of life effects on those living in them.

To assist developers and others with responsibility for securing good quality healthy homes, the Institute, along with the Association of Noise Consultants (ANC), published in 2020, the document: Acoustics, Ventilation and Overheating – Residential Design Guide.<sup>7</sup> This document is mentioned in the Building Regulations Approved Document O and provides good practice guidance on how to integrate the potential competing demands of ventilation, overheating and effective noise management.

In addition, by the end of the year, the IOA and ANC expect to publish a companion document: "Approved Document O – a Noise Guide", to assist practitioners with the implementation of the overheating mitigation requirements of Building Regulations Approved Document O.

The Institute believe that following the guidance in both these documents would improve the quality of new homes. Consequently, the IOA would urge that these two document be added to the reference list in Paragraph 014 for the Planning Practice Guidance on Noise.

## Conclusion

Over 20 years ago, a Labour Secretary of State for the Environment described noise as the Cinderella pollutant. Some would argue that this is still the case today, including, as mentioned above, the House of Lords Science and Technology Committee when it described noise as the "Neglected Pollutant". The main noise management policies in place in the NPPF do work, but they must be implemented properly. Members of the Institute of Acoustics and other professional organisations work hard to strike the balance between effective noise management and other societal needs. They even go to the lengths of producing guidance documents to help achieve these aims.

It seems clear to us that following the principles of Good Acoustics Design as articulated above would greatly help to achieve this balance in the case of new housing. Overtly referencing that hierarchy of Good Acoustic Design in this revision of the NPPF would greatly assist with the Government's policy of increasing the quantity of new housing but without risking compromising its quality.

If officials would like to explore any of the points raised in this response further, relevant members of the Institute would be delighted to meet with them.

This response has been prepared by members of the Institute who are experienced practitioners in this area. The response has been approved by the Institute's Governing Council.

Institute of Acoustics,  
Silbury Court,  
406 Silbury Boulevard,  
Milton Keynes, MK9 2AF

Tel: +44 (0) 300 999 9675

Email: [ioa@ioa.org.uk](mailto:ioa@ioa.org.uk)

September 2024

---

<sup>7</sup> [https://www.ioa.org.uk/sites/default/files/anc\\_-\\_ioa\\_avo\\_residential\\_design\\_guide\\_january\\_2020\\_v1.1\\_12\\_feb\\_2020\\_0.pdf](https://www.ioa.org.uk/sites/default/files/anc_-_ioa_avo_residential_design_guide_january_2020_v1.1_12_feb_2020_0.pdf)