

PPG24 QUESTIONNAIRE

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1 INTRODUCTION

As part of the review of PPG24¹, The Department of the Environment, Food and Rural Affairs (Defra) and through it the Devolved Administrations of the Scottish Executive, the National Assembly for Wales and the Department of the Environment in Northern Ireland let a contract to examine how PPG24 had worked in practice. In particular it aimed to look at how effective PPG24 and other sources of noise guidance have been in assisting the formulation of Development Plans and in exercising Development Control. This paper reports on the findings of a questionnaire that was sent out to all Planning Authorities in England in December 2003 and on follow-up interviews that were carried out between February and April 2004

2 AIMS AND OBJECTIVES

2.1 Aims of the Project

The contracted aims of the project were:-

- to gather information from LPAs on the extent to which guidance within PPG24, and in particular how the guidance on NECs is used at a strategic planning level within their Local Plan or UDP and when considering planning applications;
- to gather information from LPAs on the extent to which WHO Guidelines on community Noise are used at a strategic planning level within their Local Plan or UDP, and when considering planning applications; and,
- to investigate the adoption of alternative approaches, both in Local Plans or UDPs, and when considering planning applications, to the determination of the suitability of land for particular types of development, based upon ambient noise levels.

2.2 Objectives

The contracted objectives of the Study were as follows:-

- to survey all LPAs of England to establish the level of NEC, World Health Organisation (WHO) Guidelines and any alternative noise impact assessment criteria in both their Local Plan/UDP and development control function, and whether they modify them in any way to suit local circumstance;
- to identify and interview a sample of 20 LPAs will to participate in an in-depth study; and,
- to explore by interview with officer of the sample LPAs their application of PPG24 in general.

3 PROCESS

The methodology for this study was divided into seven stages;

1. Preparing an initial questionnaire
2. Delivering the questionnaire to the widest possible constituency.
3. Evaluating the initial questionnaire to inform the in-depth interviews.
4. Selecting the sample of 20 planning authorities for in-depth interviews.
5. Delivering and recording the in-depth interviews.
6. Analysing the findings of the questionnaires and interviews
7. Drafting of the final report.

Based upon Symonds experience of using a similar questionnaire for a previous Defra project, a web-based questionnaire was utilised. This allowed the use of a combination of closed questions (with drop-down multiple choice answer boxes that required only a tick response) and open questions (with text boxes that allowed the respondent greater freedom in their answer). A web-based questionnaire has several advantages. For the respondent it is quick and simple to complete and it can be returned by a single click. In this way email delivery commands a greater immediacy than traditional mail. For the project, a web-based questionnaire is as quick to prepare as a paper version; is easy to deliver; the responses are immediately received; the responses are automatically entered into the database without transcription errors and are ready for analysis without delay.

Planning Authority contact details were obtained by reference to UK Online; to obtain the email address, each authority website was viewed and where possible the contact email was found by interrogating each site. This proved to be a lengthy task.

Some authorities did not list email addresses on their websites. For these a number of possible email addresses such as planning@anywhere.gov.uk were generated. These estimated addresses worked in a surprisingly large number of cases.

In total 748 emails were sent out to planning authority addresses. Of these only 66 were regarded as failures in that they were sent back as unidentified addresses.

In total there were 160 on-line responses on 31st December 2003, the advised closure date. Following that deadline there were a number of additional responses on-line and several by post and email. These were added to the final analysis and resulting in a final total of 183 responses from Planning Authorities.

The technical specification for the project set out certain requirements for the planning authorities for the second round of in-depth interviews. The aim of the sample was to include a representative mix of metropolitan, urban, suburban and rural areas, and to include:

- At least one National Park
- At least three LPAs whose areas are significantly affected by the operations of a major airport, not necessarily located within their area;
- At least three LPAs with a major railway running through their area;
- At least three LPAs with major industry located within their area; and
- At least three LPAs with a motorway or other heavily trafficked trunk road passing through their area.

The selection of planning authorities was achieved by matching the characteristics of each authority that had indicated their willingness to take part in the second round in the initial questionnaire with the attributes listed above. The names of authorities were set out on a grid with the required attributes on the grid's other axis. With the exception of a National Park a good match was achieved without having to go outside the pool of willing volunteers.

It was important that the LPA should be able to prepare for the interview in good time. Therefore at least one week before each interview the subject LPA was sent both a copy of the initial questionnaire with their recorded responses and a copy of the framework questionnaire for the interview.

During the interviews the responses were recorded manually and on tape. Following the interview, a summary transcript of each interview was prepared and sent to the interviewee for approval and/or correction.

4 RESULTS

The results of the analysis of both on-line questionnaire and the in depth interviews are discussed in detail in the project report to Defra. This analysis takes up a total of twenty pages of the forty one page report. For those who are interested in the detail it is hope that the full report will be published in time by Defra. Within the confines of this short paper we have concentrated upon providing the conclusions that resulted from our analysis of the consultations. It should be remembered that these are the conclusions of the authors alone and do not represent in any form the opinion of Defra.

The on-line questionnaire was a useful means of gathering information from all LPAs in England in a short period of time. The on-line questionnaire provides a snapshot picture of the use of PPG24 and other noise guidance in England over the period December 2003 to January 2004. The questionnaire aimed to provide simple questions that would be easy for LPAs to answer. In practice many respondents left some questions unanswered. This appeared to happen if the questions were outside the respondent's area of expertise. For example, planners might not answer questions on development control.

The second round interviews were able to provide answers of greater depth and completeness than was possible in the on-line questionnaire. The sample of LPAs used for second round interviews was to some degree self selecting and therefore possibly biased towards those LPAs with a positive interest in the use and application of noise guidance in planning. Thus the second round may therefore reflect more instances of good practice than may be found in general. This is not necessarily a bad thing since the experiences of those LPAs who are actively engaged in tackling difficult noise problems in planning provided valuable insights into how well noise guidance fares in practice. The following conclusions are based upon a consideration of both the on-line questionnaire and the second round interviews.

5 CONCLUSIONS

- The project has provided valuable insights into the use of published noise guidance by planning authorities across England.
- The main source of government advice on environmental noise and planning is PPG24 'Planning and Noise'. From the interviews it would appear that this document is generally understood and used by planners and technical departments for development control. From the questionnaire the use of PPG24 appears less complete.
- The most commonly reported significant noise sources are those from transportation. Despite the decline in manufacturing industrial noise continues to be problematic in some areas.
- There were no reported instances of forward planning policies aimed to protect special noise sensitive sites.
- There is a trend away from detailed technical content within Local Plans and UDPs. This is one reason why PPG24 and its attendant advice are rarely referenced in Local Plans and

UDPs. In authorities where there are strong links between the planning sections and the technical sections there is a greater appreciation of both the need and the means to control environmental noise.

- The existence of PPG24 is appreciated as it provides an authoritative reference for the means of assessment of noise affecting all types of development.
- The advice of PPG24 concentrates upon the major environmental noise sources, transportation noise and industrial noise. However most users of PPG24 would appreciate greater coverage of different noise sources. Current concerns focus on the problems arising from the development of brownfield sites and the resulting mixed use within towns and cities.
- The NEC methodology of PPG24 is well understood and provides a useful means of classifying undeveloped land. However there is a need for greater guidance on what are acceptable target noise levels for a finished development. NECs set the starting point but LPAs need clearer guidance in setting appropriate target levels. Targets need to take into account both the character and nature of the local environment, and of the type of development.
- BS4142² is the main tool for the assessment and control of industrial noise, but there is wide variation in how BS4142 is applied. Clear guidance on the appropriate BS4142 level difference for planning is needed. There also needs to be a distinction drawn between the criteria used for noisy development and that used for noise sensitive developments. BS4142 may be too crude for setting target noise levels in difficult circumstances. NR curves or similar spectra criteria may be more appropriate.
- The use of WHO³ guidance appears to be limited to either setting targets for noise mitigation schemes or as an authoritative reference in planning appeals. Most LPAs tend to favour UK government guidance in the first instance and look to other sources when extra support is needed or when there is no clear guidance from the UK documents.
- There was little evidence to support the use of alternative approaches to noise assessment or target setting based upon ambient noise levels.
- The large number of suggestions that follows this section is clear evidence that strong, positive guidance on a whole range of noise issues is keenly sought by all practitioners in environmental noise. It is further evidence that the guidance is regularly used in that the strengths and weakness of the current guidance are well understood.

6 RECOMMENDATIONS FOR CHANGES TO PPG24

In this section all the numerous suggestions made during the consultations for improvement to PPG24 are listed. As far as possible common themes have been grouped together but no attempt has been made to edit the suggestions.

6.1 PPG24 and Forward Planning

- As currently formulated PPG24 appears to concentrate on transportation noise sources and is mainly of interest to Development Control and/or Environmental Health. During the interviews there were several changes suggested that would make PPG24 more useful to Forward Planners. These include:-

- Future Local Development Framework Documents (LDFs) are advised to restrict the amount of detailed content in their policies and will aim to included policy 'pegs' upon which relevant guidance can be hung. The future PPG24 will need to be fit for this purpose and so will need to contain more guidance on how forward planning should treat noise issues.
- Forward planners need to know how much noise should be included in LDFs. Topics such as noise mapping and strategic planning to reduce noise exposure are on the horizon and guidance on how these are to be incorporated in LDFs is needed. Even if the guidance is in the negative (i.e. strategic noise reduction should not be included in LDFs) it should be made clear. This may be outside the remit of PPG24.
- Many forward planners find the current PPG24 difficult and unfriendly. It is important that care is taken to make the advice in the revised PPG24 accessible to the non technical lay reader. Simple clear language and well-illustrated examples would help.
- Examples of best practice implementation of noise policies into forward planning would broaden the accessibility of PPG24.

6.2 Scope of PPG24

The current PPG24 concentrate upon transport noise and needs to widen its scope. Further advice is needed on:-

- Commercial Use development,
- Mixed Used development including Brownfield site regeneration,
- Vibration and ground-borne noise.
- Low frequency Noise from traffic and entertainment sources,
- Use of Noise Barriers,
- Assessment of the upper floors of buildings,
- Insulation standards for the separation of commercial and residential use such as Living over the Shop (LOTS) development,
- Noise propagation prediction methods,
- Noise from Pubs and Clubs
- Intermittent Recreational Noise
- The assessment of noise levels using of ventilation systems; should all assessments for noise be open window?
- Construction noise limits
- The use of BS4142 in the context of planning.

6.3 Noise Exposure Categories NECs

- The NEC bands should be reduced, they are currently too wide
- The time periods are too long. Over a 16 hour periods short bursts of high noise levels can be lost in the $L_{Aeq,16\text{ hour}}$. Currently only aircraft noise has any restriction on repeated high noise levels.
- The NEC levels need to be revised in line with the recent WHO revisions.
- NEC boundaries should take into account both the nature of the development and the nature of the area i.e. different NECs for city, suburban and rural.
- Some commercial developments may be noise sensitive and should be included within the NEC approach.
- More local flexibility in NEC boundaries should be encouraged.

- The loosening of NEC 'D' to permit development within noisy areas even if sound insulation is provided to produce WHO guideline levels within living spaces should be resisted.
- Guidance as to the application of NECs to storeys above first floor is required.

6.4 Targets

- Rather than working from pre-development assessment (NECs) the noise levels of the finished development are the key and PPG24 should set out target noise levels for both external and internal positions.
- Targets can and should be aspirational, but at the local level these will only affect new development. To achieve long term improvements strategic decisions need to be taken at higher level of Government.
- Targets need to be set by reference to the latest WHO guidance and to other sources such as BS8233⁴.
- Targets should include spectra criteria such as NR curve when the noise source may contain acoustic features such as low frequencies or tonality.
- Targets should take into account the nature and character of the area.

6.5 Planning Conditions

- The wording of the conditions in Annex 4 needs to be tightened
- Compliance with planning conditions should be demonstrated.

6.6 Consistency

- The advice in PPG24 needs to be consistent with other published guidance. At the moment the advice in PPG24 is at odds with some other Government source e.g. DOE advice on schools is not consistent with PPG24.
- PPG24 should make reference to all applicable Codes of Practice.

6.7 Other Issues

- Any revision of PPG24 should attempt to address the problems of:-
- Creeping background levels
- Intensification of use over the long term
- The off-loading of noise problems to other districts e.g. a park and ride scheme can shift traffic noise (and air pollution) from an inner city to a suburban area.

7 REFERENCES

1. PPG24, Planning Policy Guidance: Planning and Noise, Department of the Environment (September 1994). website <http://www.planning.odpm.gov.uk/ppg/ppg24>
2. BS 4142:1997 'Method for Rating industrial noise affecting mixed industrial and residential areas.' British Standards Institution.
3. B Bergland, T Lindvall and D H Schwela, 'Guidelines for Community Noise', World Health Organisation, 1999.
4. BS 8233:1987, 'Sound insulation and noise reduction for buildings.' British Standards Institution.