

London Borough of Hillingdon
LOCAL DEVELOPMENT FRAMEWORK

NOISE SUPPLEMENTARY PLANNING DOCUMENT (2006)

ADOPTION /SUSTAINABILITY APPRAISAL STATEMENT



Policy and Environmental Planning Team
Planning and Transportation Group
London Borough of Hillingdon
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1.0 Introduction

- 1.1 The Noise Supplementary Planning Document (SPD) was approved for adoption by the London Borough of Hillingdon's Cabinet on 20th December 2005 and was formally adopted and published on 24th May 2006. This statement outlines the consultation process that was undertaken during the evolution of the SPD and describes how the Sustainability Appraisal for the Noise SPD helped to create a more sustainable guidance document.
- 1.2 An important element of the emerging Local Development Framework (LDF) for Hillingdon is the preparation of a Supplementary Planning Document (SPD) on Noise. A draft Supplementary Planning Guidance (SPG) was published and the subject of public consultation in 2000 but never taken through to adoption. In the intervening period, the London Plan (2004) and the Mayor's Ambient Noise Strategy (2004) have meant that it is appropriate to update the borough's work on noise, to ensure it provides useful and effective guidance within the current policy framework. The Local Development Scheme for Hillingdon's LDF identifies the need for a Supplementary Planning Document for Noise.
- 1.3 In accordance with Regulation 16(b) and 16(c) of the Town and Country Planning (Local Development) (England) Regulations 2004, any person aggrieved by this Supplementary Planning Document (SPD) may apply to the High Court for permission to apply for judicial review of the decision to adopt the SPD; and that any such application for leave must be made promptly and in any event no later than 3 months after the date on which the SPD was adopted.

2.0 Background

- 2.1 Noise – 'unwanted sound' – has been called the forgotten pollutant but increasingly noise is seen as a key Quality of Life indicator, at London, national and European levels. The EU Environmental Noise Directive 2002 covers transportation and industrial noise in the environment. The Directive requires that noise maps and action plans (noise policy) be made for agglomerations with populations greater than 100,000 along with major roads, railways and airports. The Department for the Environment, Fisheries and Rural Affairs (DEFRA) has already produced a road traffic noise map and the remainder of the maps for major areas are required by mid 2007. It is likely that Local Authorities will be involved (every five years) in the process of action planning for noise hotspots which are identified through mapping to reduce noise impacts from the above sources, through the implementation of both mitigation and planning measures.

- 2.2 Both the London Plan and the Mayor's Ambient Noise Strategy aim to minimise the adverse impacts of noise on people living and working in, and visiting London, using the best available practices and technology within a sustainable development framework. However, there is a perceived need for a more vigorous approach to noise reduction with local authorities playing an important role. The policies on noise contained within these Greater London Authority (GLA) documents indicate the specific need for boroughs to reduce noise by separating new noise sensitive development from major noise sources. Of particular relevance to Hillingdon is the GLA's intention to engage central government to reduce air traffic noise including a night time aircraft ban across London. Officers have noted that this intention, whilst set out in the Mayor's Ambient Noise Strategy, is not specifically covered in the London Plan. It is also noted that the London Plan contains no specific policies covering expansion of airports within London.
- 2.3 PPG24 (Planning and Noise) was published by the then Department of the Environment in 1994. A review of this policy document is not scheduled to commence until the end of 2005 at the earliest and so it is unlikely that a replacement Planning Policy Statement (PPS) will be finalised until the second half of 2006. Officers consider it prudent to issue an SPD ahead of this revision given the timescale involved and the need to have adopted Guidance in place at the local level. Should a draft PPS be published by Government sooner than expected and require material changes to be made to the SPD, officers will amend the SPD and submit the revised document to Cabinet for consideration.

2.4 **COMPONENTS OF THE SUPPLEMENTARY PLANNING DOCUMENT**

The Key components of the SPD are summarised as follows:-

2.5 **Location of Residential Development**

When assessing a proposal for residential development subject to transport related noise, the Local Planning Authority will use PPG 24 to determine which of the four Noise Exposure Categories (NEC's) A to D the proposed development site falls, taking account of both day and night-time noise levels. Noise Exposure Categories (NECs), ranging from A-D, help local planning authorities in their consideration of applications for residential development near transport-related noise sources. Category A represents the circumstances in which noise is unlikely to be a determining factor, while Category D relates to the situation in which development should normally be refused. Categories B and C deal with situations where noise mitigation measures may make development acceptable.

2.6 **Aircraft Noise**

PPG 24 will be taken into account when considering new planning development and proposals for mitigating aircraft noise. However, it may not

always be appropriate to rely solely on published aircraft noise contours when determining NEC category. In these circumstances, a noise measurement survey specific to the application site may be required.

2.7 Road traffic noise

The precise determination into which NEC category a development proposal falls should be supported by a detailed acoustic report. The draft SPD states that detailed levels of noise can be affected by the following:

- road gradient
- texture of the road surface
- nature of the ground between the road and measurement point,
- barriers and cuttings
- angle of view of the road
- reflections at the edge of the affected site
- reflections from buildings opposite the site

2.8 Schools and Hospitals

When determining applications for new or replacement schools, hospitals, clinics and other community facilities, the local planning authority will have regard to recommended internal noise criteria. The draft SPD gives guidance on internal noise criteria in schools. 60 $L_{Aeq,T}$ dB should be regarded as a desirable upper limit for major new schools and hospitals. There are also detailed performance requirements for acoustics of new school buildings which are contained in Building Bulletin 93 "Acoustic design of schools".

2.9 Amenity/Internal Noise Levels

An acceptable level of residential amenity must meet a range of environmental standards. In achieving the standards the Council will require details of mitigation measures. Internal design criteria for dwellings should be met on the basis of windows being open.

2.10 Industrial uses

Industrial uses will require particular attention as they can often cause severe noise problems due to both the character of industrial noise and its level. Irregular noise or noise which contains a distinguishable continuous tone will require special consideration.

2.11 Airport Buildings

Airport operational development is permitted by Part 18 of the Town and Country Planning (General Permitted Development) Order 1995 subject to consultation with the Local Planning Authority. Therefore all designs for buildings should take account of and implement current planning policy guidance. Due regard should be given to PPG24 "Planning and Noise" and BS 4142 "Method of rating industrial noise affecting mixed residential and industrial areas".

2.12 Character of area

In terms of noise, the character of area is most important with regard to the areas of open land within the borough. The draft SPD states that Planning permission will not normally be granted for developments, which would have any adverse impact within areas, which are already affected by unacceptable levels of noise exposure.

2.13 Countryside

Special consideration is required where noisy development is proposed in or near designated sites of importance for nature conservation. In some cases, noisy development may have a serious effect on the welfare of livestock on nearby farms.

2.14 Mitigation through design

Noise mitigation through the design of schemes is covered in the draft SPD under the following headings:

- **Location of the building on the site.** In particular the height of the building and the ground cover on site can affect the level of noise.
- **Screening of the Site.** Barriers or screens can reduce noise levels. They are most effective when located close to source or receiver.
- **Building form and Orientation.** Detailed consideration to the design of schemes will be needed in terms of how buildings alter noise transmission through a site.
- **Internal Planning of the building.** Consideration will be given to the prospective occupant of the development in the design of appropriate amenity areas. Where possible amenity areas should be screened from the major noise source.

2.15 Key Stages involved in the preparation of the Noise SPD and its Sustainability Appraisal.

These are:

- Draft Noise Supplementary Planning guidance Document 2000.
- Production of the draft Noise Supplementary planning Document - April 2005
- Production of Sustainability Appraisal of Draft Noise SPD - June 2005
- Consultation on the draft Noise SPD and Sustainability Appraisal – July/August 2005
- Cabinet Approval for formal adoption of the Noise SPD, December 2005

- Noise SPD, Adoption/Sustainability Appraisal Consultation Statement - April 2006

3.0 Consultation Process

- 3.1 This statement sets out, in accordance with regulation 18 (4) (b) of the Town and Country Planning (Local Development) (England) Regulations 2004, the public participation and consultation process undertaken for the Noise SPD.
- 3.2 Formal public consultation on the Draft SPD ran for 6 weeks from 24th August to the 30th September 2005.
- 3.3 Copies of the draft SPD and the accompanying Sustainability Appraisal were sent to approximately 137 statutory bodies in electronic format on CDROM. Posters advertising the consultation were sent to GP's, post offices, community centres and higher and further educational establishments.
- 3.4 Approximately 1068 letters were sent to other individuals and organisations informing them of where the consultation documents could be viewed and where CD's and hard copies could be obtained. Hard copies of the consultation documents were made available at all 17 Hillingdon libraries, Hayes One Stop Shop and the Planning and Transportation Group reception in the Civic Centre. Appendix 1 of the report contains the full list of consultees for the Noise SPD which conforms to Hillingdon's Statement of Community Involvement.
- 3.5 Representations on the Noise SPD have been received from organisations including Sharps Redmore Partnership, The Countryside Agency and English Heritage. There were also representations from residents in the borough and the Hayes and Harlington Community Development Forum.
- 3.6 The main issues raised during the public consultation on the Draft SPD related to the Noise exposure categories from PPG24, aircraft noise, noise contours and noise mitigation measures. For more information on the main changes to the SPD and the representations see Table 1 below and Appendix 2.

Table 1.0: Results of Consultation Process for the SPD.

Representation	Amendments to SPD	Implications for any further Sustainability Appraisal
Noise levels in table two will inevitably be seen as limits of	Advice will be included in relation to table 2 in the	No negative implications anticipated.

accessibility.	final version of the SPD. Any consequential clarifying amendments in paragraph 4.18 will be made	
Paragraph 4.5 notes that the approach in relation to proposed residential development is derived from PPG24 but takes account of local circumstances. This is reasonable; however, paragraph 4.8 then seeks to apply the limits suggested in table 2"following any mitigation measures". As discussed, the limits in table 2 are to be achieved with windows open. Thus both the internal limits and garden limit must rely on mitigation by added distance and screening alone- as suggested at Key Point 10. The post mitigation levels will be difficult to achieve.	Advice will be incorporated to the effect that if the criteria of Table 2 cannot be met in all cases, a judgment will be made having regard to the number of dwellings affected and whether all reasonable steps have been taken to control and mitigate noise. Also SPD Key Point 10 will be revised to give some information on control of noise at the receiver.	No negative implications anticipated
The provisions of paragraph 4.18 and 4.19 will effectively ensure that there would be no residential development in Hillingdon in the future. This is an unnecessary set of provisions bearing in mind that with good glazing/ventilation, residential development in even very noisy areas can be made acceptable and desirable examples include Mayfair and Manhattan.	It is acknowledged that this advice should be made clear in the SPD document and advice will be included in relation to table 2 in the final version of the SPD. Any consequential clarifying amendments in paragraph 4.18 will also be made.	No negative implications anticipated
It must be made clear that the detailed housing design measures under key point 10 offer guidance options for consideration by applicants and do not set hard and fast rules regarding layout and design issues.	Noted. It is intended that an introduction to this key point is added to indicate that it offers guidance options for applicants and should not be regarded as specifying prescriptive design measures.	No negative implications anticipated

4.0 Sustainability Appraisal Statement

- 4.1 A Sustainability Appraisal was prepared for the draft Noise SPD under the requirements of the Town and Country Planning (Local Development) (England) Regulations. This section provides the details of the consultation on the Sustainability Appraisal (SA) for the Noise Supplementary Planning Document (SPD) including information on how the SPD was changed as a result of the Sustainability Appraisal, responses to consultation and any implications for the SA.
- 4.2 In addition, the ODPM guidance on Sustainability Appraisal for Regional Spatial Strategies and Local Development Documents, section 4.5.6 and Environmental Assessment of Plans and Programs Regulations 2004 (which covers the European Directive 2001/42/EC on Strategic Environmental Assessment) section 16.3-16.4, requires a Consultation Statement, after the adoption of the SPD, that lists the following information:
- How sustainable considerations have been integrated into the SPD?
 - How the sustainability appraisal report has been taken into account?
 - List of consultation bodies and the availability of relevant documents
 - How the results of any trans-boundary consultations entered into have been taken into account?
 - Reasons for choosing the SPD as adopted in the light of the other reasonable alternatives dealt with.
 - Measures that are to be taken to monitor the significant sustainable effects of the implementation of the SPD.

4.3 How sustainability (environmental, social and economic) considerations have been integrated in to the plan or programme.

The Sustainability Appraisal for the draft Noise SPD was carried out in July 2005 and the following key sustainability issues were identified:

- Transport Noise
- Health of residents
- Traffic congestion
- Amenity value
- Economy

- 4.4 The following highlight the considerations for the SPD in order to address the above-mentioned sustainable issues.

4.5 Transport Noise

The provision of Noise measures will need to reduce road traffic noise in sensitive locations, but will not reduce congestion.

- 4.6 Health of residents
The implementation of the Noise SPD will help to reduce noise generation in sensitive locations and thereby reduces the likely exposure to residents.
- 4.7 Traffic congestion
The provision of Noise measures will need to reduce road traffic noise in sensitive locations, but will not reduce congestion.
- 4.8 Amenity value
Noise reductions measures will need to help to maintain and create a satisfactory residential environment
- 4.9 Economy
Guidance on noise should prevent excessive noise generation in areas where business is thriving. Unacceptable levels of noise can be a disadvantage in attracting new business to the area.
- 4.10 How the Sustainability Appraisal Report has been taken into account in the final Noise SPD**
- 4.11 The sustainability appraisal identified some key areas where the inclusion of certain changes will help mitigate for some of the impacts identified. The following table identifies the recommendations made in the SA and the consequential changes (or otherwise) that were undertaken.

Table 2.0: List of the changes adopted in the final Noise SPD and the Sustainability Appraisal recommendations

Sustainability Appraisal recommendations for the Noise SPD	Changes made to the draft Noise SPD or reasons why the SPD was not changed.
The SA has indicated a need for a more combined approach to planning for noise including land-use separation and appropriate mitigation measures.	The SPD has been amended where necessary to include greater detail on land-use separation and mitigation by design measures.
The SA has indicated a need to locate sensitive receptors away from noisy areas and those deemed inappropriate.	No change necessary. Key Point 1 and Key Point 4 of the SPD seek to separate noise sensitive development such as housing, schools and hospitals from noise generating uses.
The SA has highlighted that noise reduction in business locations is likely to minimise the negative impact of noise on the surrounding environment and residential areas.	No change necessary. Key Point 6 of the SPD encourages sustainable business practice together with effective design standards to limit the impact of noise.
Although the noise SPD contains mitigation for transport noise it will do little to reduce traffic volumes or promote public	No change made. It is accepted that the Noise SPD cannot address these issues. Other component documents within the

transport use.	Hillingdon Local Development Framework and the adopted UDP consider these issues.
The SA has identified possible effects on amenity and landscape character from incorporating design features to minimise noise. Although extent of the possible impact is not possible to predict accurately. Some residual negative effects can be expected.	No change necessary. The design guidance contained in the Hillingdon Design and Accessibility Statement (HDAS) will provide sufficient mitigation.
Landscape character/ visual amenity can be affected where screening is visible to a wider area.	No change necessary. The design guidance contained in the Hillingdon Design and Accessibility Statement (HDAS) will provide sufficient mitigation.

4.12 How the results of any consultations relevant to the Sustainability Appraisal have been taken into account in the final Noise SPD

4.13 A detailed summary of all the responses made to the SPD and the comments on them can be found in Appendix 2 of this statement. No comments were received on the Sustainability Appraisal Report. However, comments on the SPD have been taken into account as part of the Sustainability Appraisal process which resulted in some of the amendments to the SPD, these are shown in table 2.

4.14 The reasons for choosing the plan or programme as adopted, in light of the other reasonable alternatives dealt with;

4.15 Several options were considered as part of the sustainability appraisal of the Noise SPD. Option 5 was considered to be the option most able to meet the sustainability objectives.

4.16 Option 1. Do Nothing.
This option proposes that the Borough makes no provision for noise reduction within the planning framework for Hillingdon. The ‘Do Nothing’ option would not encourage such land use within Hillingdon. As mentioned in Section 3.1, the test of how well the Noise SPD contributes towards sustainable development depends on how well it fosters the “maintenance of high and stable levels of economic growth and employment”. Making no provision for Noise related issues would significantly hinder the Borough’s ability to protect noise sensitive receptors from noisy development which would support new business and economic growth, and is therefore not considered as an appropriate or valid option.

4.17 Option 2 – Status quo – retaining the existing situation”

The principal alternative to the implementation of the Noise SPD is to retain the status quo. The existing UDP makes no provision specifically for noise development. Hence the 'Status Quo' option will result in the same outcome as the above 'Do Nothing' Option and is discounted for the same reasons stated.

4.18 Option 3 - "PPG24 Noise Standards"

Annex 1 of PPG 24, Planning and noise, details specific noise exposure categories (NEC) for certain types of development. A distinct option for the SPD would be to consider using the same exposure categories in order to determine the level of noise reduction required or the potential separation of noise generating uses from sensitive receptors. The noise exposure categories are considered an appropriate means of determining the type of mitigation that might be required on specific noise generating uses in the borough, including aircraft and traffic noise. By mitigating the impact of road traffic noise it will be possible to manage the effects of traffic on the environment.

4.19 This option is likely to help manage the negative impacts of noise in residential areas. By applying Noise exposure categories in residential areas an appropriate level of noise can be determined and this can have a positive affect on human health. Other sensitive receptors such as landscape character areas will also benefit from NECs which limit their exposure to excessive noise and contribute towards the ecological health of the borough.

4.20 Option 4- "*Land-use separation*"

Hillingdon's approach to noise and noise sensitive development could be to seek their physical separation through the exercise of land use planning controls. This alternative option would allow noise sensitive development to be segregated away from any noise generating uses which can have a positive affect on residential locations, landscape character areas and some business environments. However, this option is unlikely to work in practise given the many and varied land-uses that occupy certain areas of the borough. Indeed businesses which require good transport links may also be sensitive to noise and would not benefit from any such separation.

4.21 Option 5 - "*Combined Land-use separation and appropriate PPG 24 Noise standards*"

The most effective option for the SPD is a combination of measures to ensure the most appropriate noise reduction techniques in the right locations. Therefore, if suitable separation cannot be achieved then it maybe possible to consider whether it is practicable to control or reduce noise levels, or to mitigate the impact of noise, through the use of conditions or planning obligations. The combination of land use separation

and mitigation measures, based on PPG 24 noise exposure categories, would significantly increase the council's ability to plan against the negative impacts of noise in all locations, including sensitive receptors such as residential areas, schools and hospitals. Together with meeting the sustainability objectives of the borough

4.22 The measures that are to be taken to monitor the significant sustainability issues of the implementation of the plan or programme

4.23 The significant issues discussed above, and given in detail in the Sustainability Appraisal, will be monitored as part of the Local Development Framework Annual Monitoring Report (AMR). The AMR includes monitoring of sustainability criteria including those indicators listed in the Sustainability Appraisal Report of the draft Noise SPD.

5.0 Outcome

The Noise SPD was approved for adoption on 20th December 2005 following Cabinet approval and was formally adopted and published on 24th May 2006. The accompanying Sustainability Appraisal was developed in tandem with the SPD and helped to establish stronger monitoring mechanisms and mitigation measures, including more clarity as to the amount and size of acoustic screening in certain locations.

The Noise SPD will form part of the Local Development Framework (LDF), a new planning framework, which the Council is required to produce to promote and manage land-use within our area. The inclusion of the Noise SPD in the LDF ensures it will be integrated with, and make a contribution to, this new spatial planning system being developed in the borough.

The Noise SPD has been prepared in anticipation of the development of specific policies in the LDF 'Core Strategy'. In the interim period the SPD will be taken into account by the Council in determining planning applications as supplementary to relevant policies in the adopted Unitary Development Plan 1998.

Appendix 1: Consultation list for the Noise Supplementary Planning Document

Chamber of Commerce

Eastcote Chamber of Commerce
Hayes Chamber of Commerce
Hillingdon Chamber of Trade Commerce & Industry
Northwood & Pinner Chamber of Trade
Ruislip Chamber of Commerce
Uxbridge & Drayton Chamber of Trade & Commerce

Community Groups

DASH
Hillingdon Association of Voluntary Services
The Hayes Town Partnership

Housing

Acton Housing Association
Airways Housing Association
Anchor Housing Association
Apex Housing Group
Bellway Homes
Catalyst Housing Group
Co-op Home Services
Ealing Family Housing Association Ltd
Fairview New Homes plc
Family Housing Association
Frays Charitable Housing Association Ltd
Home Group
Inquilab Housing Association
John Grooms Housing Association
Laing Homes Thames Valley
Metropolitan Housing Trust
Network Housing Association Ltd
Notting Hill Home Ownership
Notting Hill Housing Trust
Paradigm Housing Group Ltd
Pathmeads Housing Association
Shepherds Bush Housing Association
Slough Estates
Spelthorne Housing Association

Sutherland Housing Association
Thames Valley Housing Association
Warden Housing Association

Residents and Tenants Associations

Auriol Drive Residents Association
Avondale Tenants and Residents Association
Bell Farm Estates Residents Association
Botwell Common Area Tenants & Residents Association
Botwell Tenants and Residents Association
Bovis Residents Association Group
Braybourne Close Residents Association
Brearley Close Residents Association
Brook Green Residents Association
Chapel Lane Residents Association
Chiltern View Residents Association
Cleave and Savoy Residents Association
Cleveland Road Residents Association
Cobden Close Riverside Residents Association
Colham Green Road Residents Association.
Colham Manor Residents Association
Colham Residents Association
Connaught Residents Association
Court Drive Householders Association
Cowley Tenants and Residents Association
Crane Ward Residents and Tenants Association
Cranford Cross Residents Association
Croyde Avenue Residents Association
Dell Farm Residents Association
Dene Road Residents Association
Eastcote Residents Association
Eastcote Park Estate Association

Ferndale Area Residents Association
Frayslea and Cowley Road Residents Association
Friends of Hillingdon House Farm
Gatehill (Northwood) Residents Association
Gatehill Residents Association
Gledwood Residents Association
Grange Park Residents Association
Glebe Tenants and Residents Association
Harefield Tenants & Residents Association
Harlington Village Residents Association
Harmondsworth and Sipson Residents Association
Hayes Garden Village Residents Association
Hayes Park Residents Association
Hayes Town Centre Residents Association
Hercies Road Residents Association
Hill Road Residents
Hillingdon Council Tenants Federation
Hillingdon Court Park Residents Association
Hillingdon Disabled Tenants and Residents Association
Hillingdon Village Residents Association
Hobart Road Residents Association
Holloway Lane Residents Co. Ltd.
Home Farm Residents Association
Ickenham Residents Association
Lake View Estates Residents Association
Langworth and Forsters Residents Association
Laurel Lane Residents and Tenants Association
Longford Residents Association

Lych Gate Walk Tenants Association
Mayfield Close Residents Association
Nestles Avenue Action Group
North Hayes Residents Association
North Hyde Road Residents Association
North Uxbridge Residents Association
Northwood Hills Residents Association
Northwood Residents Association
Oakfarm Residents Association
Parkfield Road/Oak Avenue Petition Group
Pastures Mead Residents Association
Philpots Farm Residents Association
Pield Heath Residents Association
Robinwood Grove Residents Association
Rodwell Close Residents Association
Rose Park Residents Association
Ruislip Residents Association
South Ruislip Residents Association
St Laurence (Cowley) Residents Association
St Vincent's Tenants and Residents Association
Stockley Residents Association
The Association of the Residents of the Drive
The Avenue Residents Association
The Larches Residents Association
Townfield Residents Association
Tudor Way Residents Association
Uxbridge Common Residents Association
Uxbridge Moor Residents Association
Victoria Road Tenants and Residents Association
Vine Lane Residents Association
Violet Avenue Tenants and Residents Association
Waterloo Road Residents Association

Waye Avenue Residents Association
West Drayton Amenity Association
West Drayton Garden City Residents Association
West Drayton Initiative Group
West Drayton Residents Association
Whitehall Residents Association
Whitehorn Estate Residents Association
Willow Tree Lane Area Residents Association
Willows Residents Association
Wise Lane Residents Association
Yeading Residents Association
Yiewsley and West Drayton Town Centre Action Group

Statutory Agencies

British Telecom
Building Research Establishment
CAA
Commission for Architecture & Built Environment
Commission for Radical Equality
Countryside Agency
DASH
Disability Rights Commission
English Heritage
Equal Opportunities Commission
Estates and Wayleavers
GLA - Strategy Directorate
Government Office for London
Greater London Authority
Health and Safety Executive
Highways Agency LNCS Area 24
London Ambulance Accident & Emergency Service
London Ambulance Service West Sector HQ
London Borough of Ealing
London Borough of Harrow
London Borough of Hounslow
London Bus Service

London Fire & Emergency Planning Authority
London Fire Brigade
London Transport Planning
London Underground Limited
Metropolitan Police
Ministry of Defence
Network Rail
North London LDZ
Slough Borough Council
South Bucks District Council
Spelthorne District Council
Surrey County Council
Hertfordshire County Council
Buckinghamshire County Council
TFL Street Management
The Environment Agency
The Housing Corporation
Three Rivers District Council
Transport For London

Local Strategic Partnership

BAA (Heathrow Airport Ltd)
Brunel University
Chimes Shopping Centre
Connecting Communities
Ealing Family Housing
Groundwork Trust
Hillingdon Association of Voluntary Services
Hillingdon Chamber of Commerce
Hillingdon Fire Service
Jobcentre Plus
Metropolitan Police
Older Peoples Forum
Pensions Service
Primary Care Trust
Uxbridge College
Uxbridge Retailers Association
Uxbridge Town Centre Manager
West London Learning and Skills Council

Parish Councils

Abbots Langley Parish Council - Three Rivers
Burnham Parish Council - South Bucks
Beaconsfield Town Council - South Bucks

Chorleywood Parish Council - Three Rivers
Croxley Green Parish Council - Three Rivers
Denham Parish Council Offices - South Bucks
Dorney Parish Council - South Bucks
Farnham Royal Parish Council - South Bucks
Fulmer Parish Council - South Bucks
Iver Parish Council - South Bucks
Sarratt Parish Council - Three Rivers
Stoke Poges Parish Council - South Bucks
Taplow Parish Council - South Bucks
Watford Rural Parish Council - Three Rivers
Wexham Parish Council - South Bucks

Sound Research Laboratories
Rupert Taylor Ltd
Sharps Redmore Partnership
W S Atkins Engineering Sciences
BRE Acoustics
Temple Group Ltd
WSP Acoustics
Environmental Affairs, British Airways
Denham Aerodrome
RAF Northolt

Libraries and Hayes One Stop Shop

- West Drayton Library
- Northwood Hills Library
- Ickenham Library
- Yeading Library
- Hayes End Library
- Oaklands Gate Library
- Oak Farm Library
- Kingshill Library
- South Ruislip Library
- Manor Farm Library
- Eastcote Library
- Yiewsley Library
- Ruislip Manor Library
- Central Library
- Hayes Library
- Harlington Library
- Harefield Library
- Hayes One Stop Shop

Random Selection of Residents

- 50 random residents per ward
- 50 random businesses per ward

Acoustic Consultants

Canella Stanger
Capita Symonds Group

Appendix 2

COMMENTS RECEIVED ON THE NOISE SUPPLEMENTARY PLANNING DOCUMENT – AUG/SEPT 2005

Organisation	Ref	Paragraph	Comment	Officer Response
Harmondsworth and Sipson Residents Association	1	Para 3.2	Near the airport it is impossible to restrict noise without restricting development.	The reference in that paragraph to minimising adverse effects of noise without restricting development is taken directly from the governments' guidance in paragraph 1 of PPG24 "Planning and Noise".
	2	Para 4.1	More detail in respect of Heathrow as a new terminal wouldn't create the noise levels that the runway, taxiways and aircraft waiting areas would. Concerns with Government over-riding local plans.	It is considered inappropriate to enter into detail in paragraph 4.1 on proposals for another runway at Heathrow. However, the following sentence will be added to SPD Paragraph 4.1: "If noise impact cannot be made acceptable through separation and other noise control measures, planning permission would normally have to be refused".
Entec- On Behalf of Defence Estates	3	Para 2.1:	Object, reference to Northolt Airport to reflect RAF Northolt, wording 'problem'.	Reference in the SPD to Northolt Airport will be replaced. SPD paragraph 2.1 will be amended so as to refer to noise as a "planning issue" rather than a "problem" as at present. A sentence will be added to paragraph 2.1 stating that the measures put forward in the SPD can be used to successfully manage noise and minimise its impact on sensitive receptors.
	4	Para 4.2	Would strongly object to any proposals relating to control operational requirements of RAF Northolt.	Noted
	5	Para 4.10	Object, SPG should note a number of measures that have been implemented to minimise the aircraft noise.	Noted

Organisation	Ref	Paragraph	Comment	Officer Response
	6	Para 4.14	Needs more clarity. Is this a definitive list of factors, point 2 refers to the area around Heathrow and the SPG should provide guidance on implications for developments in the site.	Further information on assessing aircraft noise is given elsewhere in Key Point 2, and amendment of paragraph 4.14 as suggested is not considered necessary. Amendments to paragraph 4.14 will be made to make it clear that the three bullet points are “additional” factors to be considered.
	7	Para 4.29	Support, all buildings comply.	Noted
RPS Planning	8	Key Point 1	Consider that this document should include some flexibility in relation to the application of Table 1: Noise Exposure Categories for New Dwellings near existing noise sources when assessing a proposal for residential development subject to transport noise.	The advice contained in the Supplementary Planning Document on noise takes account of the government’s advice in PPG24 “Planning and Noise”. In particular, the advice in Key Point 1 on residential development is closely based on the corresponding advice in PPG24, and it would not be appropriate for our advice to depart significantly from the government’s advice. In consequence, any flexibility in application of Table 1 would have to be consistent with the advice in PPG24. Nevertheless, the noise impacts should be considered in relation to each site, and that factors specific to each site should be considered.
	9	Key Point 10	It must be made clear that the detailed housing design measures under key point 10 offer guidance options for consideration by applicants and do not set hard and fast rules regarding layout and design issues.	Noted. It is intended that an introduction to this key point is added to indicate that it offers guidance options for applicants and should not be regarded as specifying prescriptive design measures.
Internal-Transportation DC	10	MAPS	Only observation is that by the time 2007 rolls around, the noise maps, which are based on 2001 data, will be outdated.	Noted

Organisation	Ref	Paragraph	Comment	Officer Response
Internal- EPU	11	General	Numerous grammatical and presentation issues.	Noted
Sharps Redmore Partnership	12	General	We believe that the Noise SPD is poorly constructed and many provisions are unrealistic. Some are not in accordance with Government policy or LBH's own policy.	It is acknowledged that PPG12 requires supplementary planning documents to be consistent with national policy and the advice contained in the Supplementary Planning Document on noise takes account of the government's advice in PPG24 "Planning and Noise. Hillingdon's policy on noise contained within the UDP 1998 is also consistent with the guidance within this SPD.
	13	Section 5 (Table 2) and Paragraph 4.18	Suggests that noise levels in table two will inevitably be seen as limits of accessibility.	The noise levels in table 2 are intended as criteria for arriving at a judgement on whether noise levels are acceptable. This is quite distinct from use of noise levels as noise limits and they should not be used in this way. Hillingdon's internal guidance to officers states that if criteria cannot be met in all cases, the officer will make a judgement having regard to the number of dwellings affected, and whether all reasonable steps have been taken to control and mitigate noise. It is accepted that this advice should be made clear in the SPD document and advice will be included in relation to table 2 in the final version of the SPD. Any consequential clarifying amendments in paragraph 4.18 will be made.

Organisation	Ref	Paragraph	Comment	Officer Response
	14	Paragraph 4.18	Paragraph 4.18 objects to the statement that the levels “should be met on the basis of windows being open”	There is support for this in the World Health Organisation Guidelines, 1999. The who document states on page 46 that “it should be possible to sleep with a bedroom window open...” Also page 61 of the WHO document states that “at night, sound pressure levels at the outside facades of the living spaces should not exceed 45 db LAeq and 60 db LAmax, so that people may sleep with bedroom windows open” A similar view is expressed in PPG24.
	15	Section 5 (Table 2)	55 dB is the suggested noise limit for 'outdoor living areas' but is exceeded in 56% of dwellings in the UK and at least 80% of Hillingdon will be subject to noise levels exceeding 55 dB	Disagree. The criterion of 55 dB LAeq,T given in SPD Table 2 for outdoor living areas is not unreasonable. In fact, according to the World Health Organisation guidelines, this merely protects the majority from being seriously annoyed. Protecting the majority from being seriously annoyed is not a sufficiently rigorous aim for new development.
	16	Paragraph 2.3	Paragraph 2.3 infers that the suggested noise limits in the SPD are “not to be exceeded” levels.	Disagree. The noise levels in table 2 are noise criteria for informing judgement and are not noise limits.
	17	Paragraph 3.1	Paragraph 3.1 notes that PPG24 is being reviewed to be reintroduced as a PPS. The current PPG is adequate on its own to guide London Borough of Hillingdon in relation to proposed residential development. There is no need for the SPD to provide different guidance in this area.	Disagree. The advice on residential development in the SPD differs from, or conflicts with, advice contained in PPG24. The general purpose of SPDs is to provide further detail to policies in development plan documents. The SPD is consistent with PPG24 and provides additional information on noise to support Policies OE1-5 in Hillingdon’s adopted Unitary Development Plan, 1998.
	18	Paragraph 3.2	Conflicting advice with PPG24 on NEC levels.	Disagree. The SPD is consistent with PPG24 NEC levels.

Organisation	Ref	Paragraph	Comment	Officer Response
	19	Paragraph 4.1	<p>Paragraph 4.1 states that the London Borough of Hillingdon's approach is to seek physical separation of noise sources and residential development. This is not a practical aspiration in an urban area such as Hillingdon where there are a multitude of noise sources. Moreover, this aspiration flies in the face of Government policy which aims to provide housing in such areas. A more reasonable aspiration would be to provide "reasonable" living conditions by acoustic design, bearing in mind that urban areas are inherently noisier than rural areas (expectations are consequently different).</p>	<p>General principles are set out in paragraph 2 of PPG24. It is here stated that "...<i>the planning system should ensure that, wherever, practicable, noise-sensitive developments are separated from major sources of noise...</i>", and "<i>new development involving noisy activities should, if possible, be sited away from noise-sensitive land uses.</i>" In consequence, Hillingdon's approach, based on separation of noise and noise sensitive uses, is well founded on PPG24.</p> <p>Where developments are acceptable in principle but adequate separation cannot reasonably be achieved, we would seek to impose noise conditions protecting residential development from road traffic and other noise. For example, we may impose a condition requiring submission of a scheme for protecting the proposed development from such noise. The scheme could include noise mitigation measures such as those discussed in Key Point 10, including sound insulation.</p>

Organisation	Ref	Paragraph	Comment	Officer Response
	20	Paragraph 4.4	It is not practical to seek to guess noise levels in 10-15 years time.	PPG24 requires local authorities to consider noise increases that may be expected in the foreseeable future, and an example of increases at an airport. This would seem to include major new facilities at an airport. It is, of course, recognised that this may cause practical difficulties in predicting noise levels 10 to 15 years in the future. However, this is preferable to simply ignoring major infrastructure changes which could have a large change on noise levels. SPD paragraph 4.4 is reasonable and should be retained.
	21	Paragraph 4.5, 4.8 and Key point 10.	Paragraph 4.5 notes that the approach in relation to proposed residential development is derived from PPG24 but takes account of local circumstances. This is reasonable; however, paragraph 4.8 then seeks to apply the limits suggested in table 2 "following any mitigation measures". As discussed, the limits in table 2 are to be achieved with windows open. Thus both the internal limits and garden limit must rely on mitigation by added distance and screening alone- as suggested at Key Point 10. The post mitigation levels will be difficult to achieve.	The noise levels in SPD Table 2 are to be used as criteria for judgement and are not to be regarded as noise limits. Advice will be incorporated to the effect that if the criteria of Table 2 cannot be met in all cases, a judgment will be made having regard to the number of dwellings affected and whether all reasonable steps have been taken to control and mitigate noise. Also SPD Key Point 10 will be revised to give some information on control of noise at the receiver.

Organisation	Ref	Paragraph	Comment	Officer Response
	22	Paragraph 4.10	Paragraph 4.11 refers to the noise contour maps for Heathrow and Northolt. Conventionally, PPG24 NEC values for a site are determined by reference to these contours. Instead the SPD suggests that these contours “should be regarded as giving only a general indication of noise levels.	The intention of SPD paragraph 4.12 is to draw attention to a number of factors which need to be considered when using the aircraft noise contours of Maps 1 and 2 for establishing NEC category. These factors are given in the three bullet points of paragraph 4.12, and are still considered relevant. For example, the first bullet point merely advises that transport noise other than aircraft noise needs to be considered. The second bullet point advises using the latest available contours. The third bullet point notes that the contours are for daytime noise whereas both daytime and night-time noise levels determine NEC categories.
	23	Paragraph 4.13	Paragraph 4.13 advises it may not always be appropriate to rely on published contours suggesting instead that a noise survey be undertaken in order to determine noise levels at the site. However, aircraft noise levels vary substantially on a day-to-day basis; this is why noise contours, averaged as they are over the entire summer, provide a better indication of the prevailing noise level at a given site. Paragraph 4.13 seems to criticise the fact that noise contours are for the summer period only; however, all of the research into the affects of noise are based on summer period levels; it is not unreasonable to assume that impact during the summer months dictates overall impact.	Noted. The published contours must be regarded as the starting point for establishing NEC category, although it is possible that supplementary information could be required from a noise survey. It is accepted that the present caveat concerning use of the summer contours (for Heathrow) is unnecessary. This is because the summer period at Heathrow is the busiest. The necessary amendments will be made to paragraphs 4.10 to 4.13 to reflect the matters discussed above.

Organisation	Ref	Paragraph	Comment	Officer Response
	24	Paragraphs 4.15 to 4.17	It seems odd that noise maps are required to confirm the truism that the busier a road the noisier it is. The noise maps employ a noise index that differs from that employed by PPG24 and the SPD. Thus in our view they are next to useless.	The purpose of including these maps is to give information in a readily intelligible form (by way of colour coding) indicating which areas are affected by high road traffic noise levels and which areas are relatively quiet in terms of road traffic noise. This form of qualitative information may be very useful to developers or non-technical persons, and has been provided as a direct response to requests from developers. It is acknowledged that the maps are of limited use in establishing NEC categories since they use the noise index L_{den} which differs from the noise indices used for NEC categories. The present maps will be retained for the time being, but replaced with maps using NEC type noise indices when and if they become available.
	25	Section 5 (Table 2)	This section indicates the Council's internal noise criteria for "acceptable" of noise. This shows that the table 2 levels are limits of acceptability.	The fourth sentence in SPD paragraph 4.18 will be clarified to make it clear that Table 2 indicates the Council's noise criteria "for judging acceptable levels of noise."
	26	Paragraph 4.19	The provisions of paragraph 4.18 and 4.19 will effectively ensure that there would be no residential development in Hillingdon in the future. This is an unnecessary set of provisions bearing in mind that with good glazing/ventilation, residential development in even very noisy areas can be made acceptable and desirable examples include Mayfair and Manhattan.	Hillingdon's internal guidance to officers states that if criteria cannot be met in all cases, the officer will make a judgement having regard to the number of dwellings affected, and whether all reasonable steps have been taken to control and mitigate noise. It is acknowledged that this advice should be made clear in the SPD document and advice will be included in relation to table 2 in the final version of the SPD. Any consequential clarifying amendments in paragraph 4.18 will also be made.

Organisation	Ref	Paragraph	Comment	Officer Response
	27	Paragraphs 4.22 and 4.28	The reasonable provisions of the relevant standard (BS 4142) are slewed to a degree that is not warranted, in our view. Instead of relying on the provisions of the standard the SPD requires that the rating [noise] level should be “at least 5 db below the background noise level”. This is wholly unjustified by the standard which states that complaints are only likely when the rating level is 10 db above the BNL.	<p>The SPD is intended to advise on those development controls which are appropriate to avoid future noise problems. For example, we would wish to avoid permitting new industrial development which leads to the subsequent receipt of noise complaints. Hillingdon would consequently wish to avoid allowing new development which had a marginal likelihood of complaints.</p> <p>According to Clause 9 of the standard, a positive indication that complaints are unlikely is given when the rating level is 10 dB below background. In this context, our requirement for rating level 5 dB below background is considered justified and reasonable. As SPD paragraph 4.24 states, the assessment of noise should ideally give a positive indication that complaints are unlikely. This would correspond to a rating level at least 10 dB below background.</p>

Organisation	Ref	Paragraph	Comment	Officer Response
	28	Paragraph 4.27	Paragraph 4.27 seeks to expand the scope of the use of BS 4142 “and the council adopts these categories”. There is no need or justification for the extension of the scope of BS 4142.	<p>According to the foreword of BS4142: 1997, the standard gives a method of predicting whether noise of “an industrial nature” is likely to give rise to complaints from persons living in the vicinity. The scope of the standard is given in clause 1 as including a method of assessing noise levels from “factories, or industrial premises, or fixed installations, or sources of an industrial nature in commercial premises”.</p> <p>A dictionary definition of “industry” is “any branch of manufacture or trade”, with a definition of “industrial” being “relating to or consisting in industry”.</p> <p>The examples of use given in the three bullet points of SPD paragraph 4.27 fall within the stated scope of the standard, as interpreted by the above dictionary definitions. It is considered that BS 4142 is a useful assessment tool in these circumstances.</p>
	29	Paragraph 3.1 and 3.2	Paragraphs 4.31 and 4.32 consider the character of the area, seemingly with a view to proving further reasons why no residential or noise producing development will be allowed in noisier areas of the Borough.	The comments contained in this paragraph concerning SPD paragraphs 4.31 and 4.32 have been noted above and no response is considered necessary.
	30	Paragraph 4.34	Paragraph 4.34 notes the serious effect that noisy development may have on livestock ignoring research that suggest that the opposite is more often the case.	Paragraph 4.34 recognises that the degree to which different species will be affected varies and states that the Council may consult other organisations for advice. The Council will take into account any advice or research on this topic.

Organisation	Ref	Paragraph	Comment	Officer Response
	31	Key Point 10	Key Point 10 is, in our opinion, extremely ill-considered. It makes no mention of noise mitigation at the receiver. In an urban area, such as Hillingdon, it is simply not feasible to rely on mitigation by the provision of distance between source and receiver, building design and screening.	<p>In fact, paragraph A1 of Key Point 10 states that noise control measures fall into three categories, with one of these being noise control at the receiver. It is true, however, that no details of the latter are given in Key Point 10.</p> <p>As acknowledged in the SPD, the contents of Key Point 10 are largely based on material taken from the booklet "Sound Control for Homes", Building Research Association & Construction Industry Research Association, 1993. In order to meet the criticism made, it is proposed that a new section dealing with control of noise at the receiver is introduced into Key Point 10.</p>
	32	Section 5.0	Section 5 sets out criteria for different areas. In all cases, the suggested limits are unnecessarily stringent and generally unachievable in an urban area such as Hillingdon (note: limits to be achieved with windows open).	These criticisms have already been raised. The Council's response to these criticisms has already been given above. As stated before, Table 2 gives noise "criteria", not noise "limits."

Organisation	Ref	Paragraph	Comment	Officer Response
	33	Paragraph 5.3 to 5.6	Paragraph 5.3 to 5.6 is a discussion on a single issue, this being the PPG24 guidance that changes in noise levels of less than 3 dba are not perceptible under normal conditions.	It is considered that the advice in the SPD has been frequently misinterpreted. One of the most important aspects of the noise assessment for new noise generating development is to identify and predict increases in noise levels. It is equally important to make judgments on the perceptibility and significance of these increases in noise levels. For this purpose, it is common practice to make reference to the statement in the glossary of PPG24 on minimum perceptible change. The issue of the perception and significance of noise changes is often critical in the assessment of noise generating development. It is therefore intended that the advice contained in SPD paragraphs 5.3 to 5.6 is retained. The overall import of the views expressed in these paragraphs has received support from the Department of Environment.
Resident	34	General	Strongly points out that noise levels are getting worse in the Heathrow village area and refers to privately monitored noise readings taken in 2001. Feels that Hillingdon Council has failed to respond to issues raised in the past and has broken recently passed laws.	Noted
Oak Farm Residents Association	35	General	A mention on how air pollution makes a bowl of water turn dirty over 2 weeks	Noted
The Countryside Agency	36	General	Links to relevant policies in the current UDP are clear and the aim to plan for and manage noise levels on new developments is welcomed. Also good to see consideration given to monitoring the SPDs and assess their viability.	Noted
South Ruislip Residents Association	37	General	Concerns over noise created by developments in South Ruislip.	Noted. Once adopted the Noise SPD will help to mitigate the noise impacts of new development on the surroundings.

Organisation	Ref	Paragraph	Comment	Officer Response
English Heritage	38	General	Control of Noise Pollution is welcomed	Support noted.
Hayes and Harlington Community Development Forum	39	General	Not had time to consider this document in full, but seems to take on board the guidance available.	Support noted.