



RTPI

mediation of space · making of place

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4th November 2009

Noise and Nuisance Team
Area 2a, Nobel House
17 Smith Square, London
SW1P 3JR

Email response sent to: noiseactionplanconsultation@defra.gsi.gov.uk

Dear Sir/Madam,

RESPONSE TO: Consultation on Draft Noise Action Plans

Thank you for the opportunity to respond to the above. The Royal Town Planning Institute (RTPI) is a membership organisation representing over 22,000 spatial planners. It exists to advance the science and art of town planning for the benefit of the public.

This document responds to the Consultation on Draft Noise Action Plans issued by Defra.

The response has been formed drawing on the expertise of members including the RTPI Environmental Planning and Protection Network.

If you require any further assistance, please contact Nicola Gough, Network Manager, on 020 7929 9494 or email network.manager@rtpi.org.uk

Yours faithfully,

Matt Thomson
Acting Director Policy and Partnerships

Enc.

General Observations

As we understand it, paragraph 2.11 of the main consultation document explains that Defra will liaise with Local Authorities (LAs) regarding action planning and that since reviewing 3rd party proposals is part of LAs everyday function they can therefore be involved but that no specific additional burden would arise.

Paragraph 2.14 explains that Defra will liaise with LAs (in agglomerations) to identify locations that should be designated as Quiet Areas and that since this process utilise LAs existing open space management function no specific additional burden would arise.

With regards to the liaison on action plans (paragraph 2.11) the other documents show that what is expected goes beyond the typical informal discussions that development management departments might have before a planning application (with its attendant fee) is submitted. The relevant paragraphs are highlighted below.

The Draft Noise Action Plans for Major Roads, for Major Railways, and for Agglomerations are all similar in this regard as discussed in the following paragraphs. (Reference numbers are for the Draft Noise Action Plans (NAPs) for Major Roads, Major Rail, and the road section of Agglomerations. There are equivalent paragraphs in the rail section of the Draft NAP for Agglomerations.)

Action Plans

Paragraph 7.01

The implementation of the Action Plans will be a continuous process and will be reviewed every five years.

Paragraph 7.03

LAs will receive the same information as the bodies that have the duty to prepare action plans to enable LAs to participate in the detailed identification of any measures.

Paragraph 7.19

At appropriate times the relevant [highway authority] will liaise with the relevant LAs about progress and outcomes.

Paragraph 16.06 (Aircraft section of Draft NAP for Agglomerations)

The Competent Authority will monitor interaction between the relevant airport operator and the LA.

Quiet Areas

Paragraph 7.20 (Draft NAPs for Major Roads and Major Railways and corresponding paragraphs in Draft Agglomeration NAP)

[Highway Authority] should liaise with relevant LA and Competent Authority to avoid conflict between Action Plan and Quiet Area objectives (within agglomerations).

Paragraph 16.07 ((Aircraft section of Draft NAP for Agglomerations)

Competent Authority will liaise with relevant airport operator and relevant LA to avoid conflict between Action Plan and Quiet Area objectives (within agglomeration).

Comments

The above references demonstrate that for a given NAP LAs will not merely need to provide informal views from their Development Management sections on a one-off basis, but will need to involve their Environmental Health (EH) and

Highway Departments, be able to work to a detailed level, assess 'raw' data as well as provide outputs, and support frequent interaction with the Competent Authority/other bodies.

Although we understand that LAs might already have implemented inter-departmental working (including, crucially, the EH department) through their existing open space management function, we do not believe that it can be assumed that they will have considered the designation of Quiet Areas as part of that existing process.

The consultation documents seem to envisage that the designation of Quiet Areas will take place at the LA level in conjunction with the Competent Authority and that this procedure might include setting noise thresholds appropriate to the context. It is also not clear that all relevant areas that could be designated as quiet areas will already be included in the LA's 'list' even though the list should include land not in the LA's ownership. Consequently, there will be detailed work for the LAs to do in designating quiet areas and in confirming that no other candidate areas exist in their districts.

In conclusion, we believe that resourcing implications for LAs have been underestimated, and that their involvement and the required resources need further consideration.