



WEST LoTHIAN COUNCIL
DRAFT SUPPLEMENTARY GUIDANCE – PLANNING & NOISE
HOMES FOR SCOTLAND COMMENTS
February 2017

Homes for Scotland welcomes the opportunity to comment on the West Lothian draft Supplementary Guidance – Planning and Noise.

We note that Policy EMG 5 – Noise of the Proposed West Lothian Local Development Plan refers to Supplementary Guidance on noise, and Page 270 of the Proposed Plan refers to Supplementary Guidance that will come forward with the LDP on noise. It is not, however explicitly set out within the draft guidance Introduction or elsewhere that this guidance will form statutory Supplementary Guidance as part of the LDP. We also suggest that a link is added to the text to the specific LDP policy to which it refers to add clarity to the policy 'hook' within the guidance.

In terms of the guidance itself, Homes for Scotland has some short comments relating to paragraphs 3.2 and 3.4 of the draft. Paragraph 3.2 states that *“only in exceptional circumstances (see paragraph 3.4) should satisfactory internal noise levels be achievable with windows closed and other means of ventilation provided. Where these exceptional circumstances exist, and achieving satisfactory internal noise levels are based upon closed windows, external amenity areas may well be noisier than would otherwise be considered acceptable.”* The following section 3.4 then goes on to detail these 'exceptional circumstances' which are “only likely to apply to flatted residential developments”, and only sites which are “small to medium scale infill sites in urban areas”, “brownfield sites, town and village centre sites, and sites near public transport hubs”. We query this in relation to Planning Advice Note 1/2011 Planning and Noise which states in paragraph 16 that “in some circumstances however, closed windows with alternative means of ventilation may be unavoidable. Passive systems may be considered but mechanical ventilation should only be used as a last resort. Therefore in line with PAN 1/2011, closed windows may be considered in circumstances where an alternative is 'unavoidable'. The PAN does not differentiate between flats and houses, nor brownfield or greenfield sites. We therefore consider that paragraph 3.4 of the draft guidance should be amended to add more flexibility, and be in line with PAN 1/2011.