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6 August 2009

Environmental Noise and Health in the UK

Comment on Draft Report by the Health Protection Agency on behalf of the ad hoc Expert Group on the Effects of Environmental Noise on Health

Environmental Protection UK welcome the opportunity to comment on this draft report, which has the potential to support the development of sound policy to mitigate the impacts of transport noise.

About Environmental Protection UK

Environmental Protection UK brings together organisations from across the public, private and voluntary sectors to promote a balanced and innovative approach to understanding and solving environmental problems, through policy development and education. We are a registered charity with 110 years experience of environmental campaigning, public information provision, producing educational resources and policy formulation.

Environmental Protection UK's membership includes policy makers, regulators and practitioners from local authorities, consultants, developers, academics, industry and interested NGOs.

Overview

- **Proper application of the precautionary principle to protect health from environmental noise**

We find the nearest thing to a helpful conclusion in this report is the Chairman's acknowledgement that "In the air pollution field (multiple causality) has led to a move away from defining 'safe' levels of exposure to pollutants and a move towards expressing results in terms of probabilities of occurrence of a specified effect at a specified level of exposure. It seems likely that such an approach is also applicable in the environmental noise field." Given the requirements of the Environmental Noise Directive, a proper application of the precautionary principle would include moving from guidelines to standards and targets to afford some health protection from environmental noise can be set now, drawing on the existing body of knowledge, as has been done for air quality for many years.

- **Research recommendations are helpful – guidance on prioritisation is necessary.**

While the Chairman of the group states ‘it is clear that many people are affected, some seriously, by exposure to environmental noise’, the report gives no help to policy makers, tasked by the Environmental Noise Directive, with working to “to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise.” Eighteen recommendations for research are listed. Not all of these are directly related (if at all) to health impacts (9.2 changing attitudes; 9.3 mapping public response; 9.4 complaint recording). For realistic progress to be made, policy makers need to know where to start. To minimise delay, prioritisation could be the first task of a new Expert Group.

- **Clarity on conclusions is required. We recommend highlighting acknowledged impacts to encourage progress in health protection**

The executive summary lists 17 conclusions. A handful of these directly relate to health impacts: **exposure to environmental noise affects sleep, increases stress, slightly increases the risk of hypertension and cardiovascular disease; and impacts on cognitive performance of children.** It appears to us that these should be priority areas for further research.

It is acknowledged in the Chairman’s introduction that ‘Environmental noise in the UK is a problem’ and that: “If it is accepted that health should be defined in such a way as to include wellbeing then these people can be said to suffer damage to their health as a result of exposure to environmental noise.” There is a clear established consensus, not least within the World Health Organisation¹ that wellbeing is a requirement of health, and the report should not equivocate.

- **Regulation of Environmental Noise**

We find the comment on the need for simplification of regulation of environmental noise rather odd at this stage in policy development. This report appears to cover transport noise, which is now regulated overall, in respect of receptors, by the Environmental Noise Directive, as transposed by Environmental Noise Regulations for the respective administrations. This is a relatively new process which is finding its way. Government has designated the Secretary of State the competent authority for this – so regulatory responsibility is clear. It is therefore the responsibility of the Secretary of State for Environment to work with other government departments and bodies towards a healthy noise climate. We hope the final draft of this report will contribute to this. We do not feel re-inventing the regulatory framework now would be a good use of public resources, or a driver to noise impact mitigation.

- **Expert Advisory Group on Noise and Health**

With the HPA stating that 10% of the UK population is exposed to daytime noise above 65dB, and noise action planning in its infancy, establishment of an expert group is fairly fundamental (there are at least two on air quality), to establish coherent and consistent advice as the process progresses. We are encouraged that the newly established MRC/HPA Centre for the Environment and Health has noise in its research remit and will be looking at links between the impacts of air and noise. Government should accept the principle of a new group, and consult speedily on its membership, and how to ensure it is independent, e.g. including more academics, and being required to publish an annual review of evidence and summary of key recommendations to Government, to enable scrutiny.

¹ The World Health Organisation definition of health is ‘a state of complete physical, mental and social well-being not merely a lack of illness or infirmity

Detailed comments

a. The scope of the report.

The report defines its scope as covering 'environmental noise' from external sources generally impacting the external environment. At 1.1, it states it covers noise impacting the 'outdoor environment'. Most of the impacts analysed are experienced indoors (sleep, children's learning etc.). Redefinition to reflect the actual scope of the report is required.

The report only covers transport noise sources – road, rail, air – industry is also environmental noise, as defined by the Environmental Noise Directive

There is no mention here of the impact of noise from wind turbines. Two major, well subscribed, conferences (IoA wind noise Conference, Jan 2009; European Wind Noise Conference, June 2009) in the past six months alone on this topic, and planned expansion of wind energy in the UK, reinforce the this as a priority. However, to avoid delay, this report should be entitled 'Environmental Noise from Transport Sources and Health in the UK' and wind turbine noise should be an early part of the work programme of the new Expert Group.

b. The analysis provided regarding the possible effects of environmental noise on health.

The report provides a comprehensive digest of much of the research on environmental noise and attitudes to noise to date – providing a useful reference document.

The analysis could, however, be more helpful. While a list of topics requiring further research is given, there is no indication as to prioritisation that would support policy makers / potential funders in establishing a way forward for research.

It would also be helpful to have guidance as to the scale of research provided – i.e. whether European/international co-operation would be the best way forward in some areas.

Comments on noise attitudes, and recording of complaints, while constructive, will not contribute to resolving questions on health.

The suggestion that an expert group be set up is welcome, and reinforces the position of noise specialist groups including Environmental Protection UK and the Institute of Acoustics, who have for some years supported the case for a standing body of experts to advise on noise policy².

Given that existing expertise in this area is spread across Europe and beyond, and the scale of effort needed in some areas, pan-european research may be the way forward for advancing a number of the issues on the research wish list. The report should indicate where this is the best way forward, or give this as an early task for the new Expert Group.

² In 2002 'Towards an Ambient Noise Strategy' proposed an expert committee on noise –to date, not convened. In contrast, the Expert Panel on Air Quality Standards was set up in 2001, the Committee on the Medical Effects of Air Pollution (COMEAP) was in 1992, and Defra set up the Air Quality Expert Group as an advisory body (currently under review) in 2001. These groups have been instrumental in driving the establishment of air quality management.

We find the nearest thing to a helpful conclusion in this report at Appendix B, para 10: "...multiple-causality...is very important to explaining the lack of an apparent threshold of effect, a finding which is common in studies in environmental epidemiology. In the air pollution field this has led to a move away from defining 'safe' levels of exposure to pollutants and a move towards expressing results in terms of probabilities of occurrence of a specified effect at a specified level of exposure. It seems likely that such an approach is also applicable in the environmental noise field." Given the legislative drivers in place, and the body of information available on modeled and actual noise levels, we fail to see why precautionary standards to protect health cannot be set now, with the input of an advisory committee on the existing body of knowledge, as has been done for air quality.

c. Topics that might be considered in future reports.

As mentioned under a. we believe that industrial noise, and impacts from wind turbines should be dealt with by the new Expert Group, and included in a future report on environmental noise.

d. Any error detected in this draft report.

Section 4.25 is incorrect. Environmental Protection UK (formerly NSCA) no longer conduct annual surveys of noise complaints, as in 2006 CIEH introduced a new system for collecting complaints, which at the time we understood rendered ours superfluous. We have, however, since 2006, undertaken (Defra funded) public opinion polls on noise, which in 2006, 2007, 2008 found cars and motorbikes to be a major source of annoyance in neighbourhoods. Our 2009 ICM poll focused on transport noise and quiet areas.

This is the one error we have found, but are concerned that there may be other areas that need updating, given the long gestation of this report.

If you have any questions or comments, please contact us.

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