



environmental  
protection uk

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## Consultation Response Draft Noise Acton Plans (England)

Environmental Protection UK welcome this opportunity to comment on proposals for Noise Action Planning in England. This consultation response has been drafted through wide consultation with our members, noise specialists and others with an interest in working towards a cleaner, quieter healthier world.

### 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.

### Summary View

- The centralised approach to noise mapping has allowed England to meet submission deadlines where other member states, taking a more disparate approach, have failed – which we commend.
- We do not believe the 'management of noise in the context of sustainable development' is a sufficiently ambitious goal to secure a quieter England. In order to meet the aims of the END we believe that 'the delivery of good health and good quality of life through the management of noise in the context of sustainable development' should be the Government's stated aim, if the stated intention to achieve the aims and objectives of the Environmental Noise Directive is to be met.
- We accept that resources available for any initiatives are limited. However, we do not accept that this is a barrier to innovative action to reduce the impact of current or future noise. Measures to manage noise are **compatible with wider policy agendas**, which are resourced, including:
  - health and inequality
  - improving open spaces
  - climate change mitigation/adaptation
  - air quality
  - road safety
  - biodiversity.

- True integration of noise management into these wider policy areas can only be achieved with a **government policy statement** on noise.
- The establishment an **independent expert advisory group** on noise is long overdue. This is needed to establish coherent and consistent advice as this process progresses.
- **Promoting better understanding** of noise issues and remedies is required to raise awareness among the general public, professionals and politicians that noise mitigation and management can be integrated in planning, transport and open spaces policies – and that as noise makers ourselves, we can all contribute to reducing the impacts through our travel choices and behaviour.
- There is a need for the process to be further **joined up with airports**, in particular if short and longer term goals for the protection of quiet areas are to stand any chance of being achieved.
- The current plans do not currently consider the **cumulative effects of environmental noise sources** – there is scope for this to be accounted for when important areas identified to date are assessed locally and we would like to see this included in the action plans.

## Consultation Questions

**Q 1. Do you agree with the overall approach being proposed for identifying important areas and first priority locations? If not, what alternative approach would you advocate?**

### a. Stated Aim

We are slightly confused as to the stated aims of the draft Noise Action Plans - 1.04 states they 'will assist the management of environmental noise in the context of sustainable development', while 5.05 states 'this Noise Action Plan should help to deliver good health and good quality of life through the management of noise in the context of sustainable development'.

We would like to see the latter statement as the stated aim of Noise Action Planning, as this is in line with the objective of the END.

Also, we are confused that the stated aim for agglomeration noise action planning is for the process to be 'clearly accountable to the public' and rail noise action planning 'clearly understood by the public'. To comply with the END, we think these should read 'clearly communicated to the public to facilitate understanding'.

### b. National Noise Strategy

We welcome the commitment at 1.07 to delivering the aims and objectives of a National Noise Strategy – however, we do not have one. We question whether measures in the action plan which are acknowledged to require engagement with policy makers and professionals beyond noise specialists, are likely to be taken forward without a Government commitment to work towards improving the noise climate in the UK. Therefore, in lieu of a national noise strategy, we believe Noise Action Plan templates cannot be published without a Government commitment to integrate noise considerations into wider policy making.

### c. Sustainable Development

While we cannot disagree with noise protection in the context of sustainable development, we are unclear as to the implication of the emphasis given in these

draft Noise Action Plans. Measures to manage noise, while they might conflict with 'development' should not conflict with 'sustainable' development. For clarity, it would help if a definition of the term is given in the action plan. It might be more constructive and a firmer driver to action if noise action planning were to be undertaken in the context of 'sustainable development and climate change adaptation and mitigation'?

#### **d. Thresholds**

While we support an approach that prioritises attention on the areas where people are worst affected by noise, the draft noise action plans do not set out why particular thresholds have been chosen. In order to satisfy the requirement of the END that noise mapping and action planning be clearly communicated to the public, we feel that thresholds, and reasons for them, should be explained. We also believe that the existence of these thresholds should not preclude investigation of action to mitigate noise impacts in any areas where the impact of noise might be reported to be problematic locally. This should be clear in the action plans. We welcome the commitment to keep thresholds used under review – this should be in the context of emerging intelligence on noise effects – including any new research on noise and health, and any complaints about transport noise (once there is a complaints mechanism in place).

#### **e. Night noise**

We welcome the commitment to working to secure data on night time noise for future noise maps. Sleep disturbance is important with regard to health, as highlighted by the recent WHO night noise guidelines.

**Q. 2. Do you agree with the overall approach being proposed for implementing the necessary procedures for identifying what further measures, if any, might be taken to mitigate the noise in the important areas? If not, what alternative approach would you advocate?**

#### **a. Cross sectoral engagement**

With the strategic data in place, local knowledge is needed to facilitate action. Our experience is that there remain local authorities within agglomerations who currently believe noise action planning to be a central government process in which they have no role. Some local authorities in the current round of agglomerations are enlightened and keen to innovate to reduce noise impacts. However, for others, awareness of any requirement for involvement remains low, with the entire process perceived as a central government responsibility. We therefore very much support the commitment to cross sectoral engagement in the plans. Much more work needs to be done to properly engage those local authorities uninvolved to date, as well as other sectors who can play a role in current and future noise mitigation and prevention –in particular spatial and transport planners.

#### **b. Driving action**

Throughout the draft guidance emphasis appears to be that noise management is 'simply part of' existing duty (2.10). We feel the ambivalence in the stated level of engagement anticipated of local authorities (2.11) provides little incentive for them to get involved. It is clear that local knowledge is required in order to ensure any noise management/mitigation or targeting of quiet areas is appropriate – for this to be workable the knowledge of local authorities will be essential. Weak wording such as this is hardly a driver to 'action', or a means to engage the hard to reach.

### **c. Sharing the ‘burden’**

We understand that, rightly or wrongly, there is unlikely to be much, if any, funding, to support this process. However a more positive approach, highlighting areas where joined up policy making can achieve multiple goals, as set out in our Summary View above, would be more helpful.

For example: measures such as reducing speed limits, facilitating smoother traffic flow and encouraging procurement of electric vehicles can reduce noise impact and reduce emissions therefore contributing to improved air quality and reduced CO<sub>2</sub>— areas where funding is more likely to be available

Measures to protect quiet city open spaces can also improve open spaces, increase biodiversity, and contribute to climate change mitigation through reducing the urban heat island effect and water run-off – again areas where funding is likely to be available.

Many of the measures that will improve the noise environment will contribute to improving local environmental quality, therefore fitting in with health inequalities agenda.

A business as usual approach will not be sufficient to meet the requirements of the END. We believe the Noise Action Plans should promote a positive, joined up, creative approach to problem solving.

### **d. Communicating progress**

While we welcome a commitment to monitoring progress, we believe communication of progress must be proactive. While uploading information to a website puts it in the public domain – it will only be communicated if target groups know it is there. For example, E-Marketing allows for low cost targeted communication; there are a number of professional forums and networks available where progress can be regularly reported – for example local authority environmental health, planning and transport networks. Also, communicating progress through relevant specialist media. At agglomeration level, communicating progress through local authority news media, should benefit the process – as we are all transport users and contribute to environmental noise, we, the noise sufferers, can all, if properly informed, take an interest in and contribute to addressing the problem.

### **e. Control of noise at source**

It would be helpful at 3.03 to add details of the pending regulation on tyre labelling. Also, to encourage procurement of quieter technologies – through quieter procurement the noise making authorities can further contribute to noise reduction.

### **f. Limit values**

In the interests of transparency, and facilitating public understanding, it would be helpful if the Limit Values referenced at 3.13 and throughout the draft noise action plans are stated along with reference to source documents. This would make information more accessible to non-specialists, in compliance with the END requirement to communicate this process.

### **g. Cost benefit**

We do not dispute that the cost benefit of any measures needs to be considered (6.09). However, any calculated cost to the economy of, for example, reducing speed limits, should be offset against the health and social cost and associated economic cost of not reducing noise. The methodology chosen has highlighted isolated locations (7.09) that, alone, do not justify attention. It may be, that given local input, a benefit to a much larger area could be derived by taking action – thus making action cost effective. This should be noted in the guidance.

**f. Responsibility for traffic noise**

We welcome the commitment to clarify responsibility for the management of traffic noise, to improve data collection.

While we are also pleased to see the commitment of the Competent Authority to encourage land use planning and other policies that reflect the process set out in noise action planning, experience to date suggests that this will have limited success. This is demonstrated by the current lack of Government acknowledgement of noise impacts in relation to air conditioning units, micro wind turbines and wind farms. This further highlights the urgent need for a Government policy statement on noise to kick start more integrated thinking across departments.

**g. Assessing experience of noise**

We particularly welcome the proposal to explore setting up a complaints system for road traffic noise issues. Taking this forward will make a considerable contribution to ensuring action to mitigate noise impacts is correctly targeted, to raising awareness of transport noise issues amongst transport users and of the methods available to reduce noise.

**h. Industry**

While we are content with the overall approach here, no account is taken in the current draft action plans of any areas where the combined impacts of industry and transport may cause issues and effects to arise. We would like to see this addressed in future noise action planning guidance.

**Q.3 Do you agree with the approach being proposed for identifying and managing quiet areas in agglomerations with the aim of protecting the quietness of these areas and avoiding increases in noise? If not, what alternative approach would you advocate?**

The approach stated is workable. The engagement of local authorities and cross sectoral partners is essential if quiet areas are to be established and protected. In order to ensure equitable access to quiet spaces, as far as is possible, we would like to see guidance in future noise action plans on easy accessibility of quiet areas in agglomerations.

Given the reluctance to administer burdens, we feel there is much scope for joining up policies on open spaces, biodiversity, climate change mitigation and adaptation in order to create high quality quiet spaces. We believe it will further the required understanding of both the public and, to date, disengaged local authorities, if these links can be made in the guidance. This would, we hope, incentivise them to engage in the process and encourage them to engage others. We feel it is particularly important to engage planners in this.

If you have any questions, please contact :

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