

**CITY SOUNDINGS -
THE MAYOR'S DRAFT LONDON AMBIENT NOISE STRATEGY**

RESPONSE BY LONDON FORUM OF AMENITY AND CIVIC SOCIETIES

The London Forum of Amenity and Civic Societies, formed in 1988, is an umbrella organisation for some 120 residents, conservation and civic societies, community organisations and other affiliated bodies with an aggregate membership of over 100,000. It also serves as the Civic Trust's regional federation for London.

London is a noisy place, and has been getting noisier. Some sounds can add considerably to the quality of life, for example music in the open air, bird song or the wind in the trees. Such pleasant sounds have been increasingly drowned out by noise from vehicles, trains and aircraft or from excessively loud sound systems. Continental cities, for example Paris, have accorded more importance, and more resources, to controlling ambient noise.

The London Forum welcomes the draft Ambient Noise Strategy published by the Mayor as a well informed and imaginative approach to a field in which there is as yet little policy guidance at national or European levels. We support almost all the policies and proposals in the draft. In this response we first make some general comments on the approach adopted, and then offer detailed comments on aspects we consider especially important.

The draft Strategy is a pioneering effort. We note that

although the Mayor is under a statutory duty to produce this strategy, he has no specific powers to control ambient noise

although the UK government is required to report to the European Commission by 2007 on the limit values it has set for ambient noise, it is not yet known which parameters will be covered by those limit values, let alone what the limit values will be

there will in due course be a statutory requirement to produce and implement action plans to control ambient noise, but it is not yet clear on which bodies that requirement will be placed.

There are inherent difficulties in controlling ambient noise:

noises vary in intensity, duration, pitch and rhythm, and in the times at which they occur; it is difficult to combine all those factors into any generally applicable index of the annoyance caused by noise

some groups (the old, the ill, children) may well be more vulnerable to noise

assessments of current exposure to noise are dependent on noise maps, which are not yet available as a comprehensive series, and have to be produced by computer modelling

one noise source may mask others, which will therefore become more intrusive and annoying if the first source is eliminated or its intensity reduced.

Against this background, we accept

the overall vision of the Mayor's Strategy, which is (3.2) 'to minimise the adverse impacts of noise on people living and working in London using the best available practices and technology within a sustainable development framework'

the nine objectives (3.3) which elaborate that vision.

Because policy for controlling ambient noise is at an early stage, it is reasonable that this Strategy contains very few targets to be achieved by specified dates, and that nearly all the measures proposed are categorised as ongoing. It is likewise reasonable that in most circumstances the criteria for decisions should be that actions taken will be practicable and cost-effective. We emphasise, however, that there will certainly also be cases (for example, night flights of aircraft) where the impacts of noise are entirely unacceptable.

While the promoters of new roads, railways and airports have been forced to offer compensation and soundproofing to people who will be exposed to high noise levels when they come into operation, there is no comparable help for people who suffer equally high levels of noise from existing sources, including increased use of existing transport infrastructure. In devising programmes for controlling ambient noise, priority should be given to improving the position of those people suffering the highest current levels of ambient noise, especially if they are living in environments which are degraded in other respects. Pilot projects should be undertaken to investigate the feasibility and cost of control measures in a representative range of situations.

To raise general awareness about ambient noise and enlist support for programmes to control it, we propose that the Mayor should establish a London Noise Forum, with a membership that includes representatives of all the sectors which make a significant contribution to ambient noise levels.

Road traffic noise

The experience of our member groups across London confirms the finding that a significant proportion of the population regards noise from road traffic as a serious problem in residential areas. Road traffic noise also has a damaging effect on activities carried on in other types of building (for example, schools), on the quality of the environment in streets, and on the tranquillity of open spaces.

We welcome the Mayor's intention to encourage preferential use of quieter vehicles (objective 2), and to ensure full account is taken of the extent to which particular technologies reduce both noise and emissions of polluting substances. In this context, we urge the Mayor to investigate the potential of fuel cell-powered buses, which have been introduced in a number of continental cities.

A high proportion of road traffic noise, however, comes, not from the vehicles themselves, but from the interaction between tyres and road surface, and can be considerably reduced if roads are surfaced with appropriate materials. Quieter materials can also have considerable advantages in reducing spray, although their durability also has to be taken into account. The surfacing of roads in the Transport for London network is one of the few factors contributing to ambient noise which are under the Mayor's own control. These are also the roads carrying the heaviest traffic. We therefore urge him to make the resurfacing of roads in the Transport for London network with quieter materials his highest priority in controlling ambient noise.

We also urge him to encourage borough councils to use quieter materials for surfacing the more heavily trafficked roads for which they are responsible.

We support the idea that ambient noise levels might be reduced in some cases by decking over roads to create new sites for development. We regard it as essential, of course, that any such schemes should be designed to high standards, and should be environmentally and socially acceptable in other respects.

We are generally supportive of the other policies and proposals in the draft Strategy relating to road traffic noise, but make the following specific points:

- it is important to find ways of reducing the contribution to ambient noise from powered two-wheel vehicles

- there would be considerable benefit if the police could give higher priority to illegal noise from vehicles, especially illegal exhaust systems and excessive noise from car stereo systems

- the Mayor should press strongly for the law to be amended, where necessary, to make such offences less likely, in particular by providing for the confiscation of illegal exhaust systems fitted to two-wheel vehicles

- more effort should be devoted to preventing tourist coaches from running their engines for lengthy periods while stationary, thus causing both noise and air pollution

- there is still a problem of excessive noise and vibration from diesel engines in rear-engined double deck buses – that strengthens the case for early introduction of fuel cells to power buses.

The digging up of streets can give rise to very high noise levels, as well as causing great disruption. We urge the Mayor to make it a priority to reduce the damaging effects of street works in London by working with highway authorities and public utilities to improve co-ordination on the planning of such works and to increase the efficiency and speed with which they are carried out.

Aircraft noise

The draft Strategy reports that fewer Londoners regard aircraft noise as a serious problem in residential areas than so regard road traffic noise; but too much weight cannot be placed on the relative proportions because they come from a sample survey by BRE which did not

include respondents from boroughs under the Heathrow flight path. Moreover, aircraft noise has more severe impacts than road traffic noise on the tranquillity of open spaces and on schools and hospitals. There can be no doubt that aircraft are a dominant factor in ambient noise in London.

We urge the Mayor to make it a high and immediate priority to secure a ban on night flights at Heathrow, thus bringing it into line with many other airports across the world.

However, night flights are only part of the problem created by the expansion of air traffic. We question the Mayor's apparent assumption that London can become, and remain, 'an exemplary sustainable world city' by accepting hazards and environmental degradation that would not be tolerated in other cities.

The official method of assessing the 'noise climate' in areas affected by aircraft using Heathrow is artificial, erroneous, misleading, and at odds with the actual impact on the daily lives of many thousands in West London who live under the flight paths. To provide an acceptable basis for future decisions, the Mayor must press the government to adopt an honest and realistic measure of noise impact.

There are strong grounds for concluding that the projected overall growth in air transport is not sustainable. Even if it were sustainable, the London Forum regards the proposal to cater for it by building a Third Runway at Heathrow as entirely unacceptable for a number of reasons, which we have spelt out in other contexts, and which include the effect in spreading high levels of ambient noise over a much wider area of London. We therefore urge the Mayor to adopt a stronger and clearer position of opposition to a Third Runway.

There are also aspects of the present situation that demand attention:

the so called 'tactical discretion' for air traffic controllers referred to in box 39 can have, and has indeed had, far-reaching consequences for exposure to aircraft noise, without any opportunity for the public to express views. We urge the Mayor to include as an additional policy in the Strategy that he will lobby for wide consultation on all changes in routes and procedures for aircraft which affect local populations

government references to 'fuller utilisation of existing runways' imply a threat to the present system of runway alternation at Heathrow, which provides relief to those badly affected by aircraft noise. We believe it is essential this system is retained, and we urge the Mayor to maintain strong pressure for that

the Mayor should press for meaningful sanctions against airlines which do not comply with procedures or keep to their assigned tracks for landing at Heathrow. He should also press for complainants to have ready access to data from the flight-tracking system, so that individual noise events can be investigated effectively and transparently. Policy 48 should be strengthened accordingly

London City Airport presents particular problems because of its location within an urban area. Conditions are imposed under a section 106 agreement with Newham Council. The Mayor should keep under review the noise levels from aircraft movements, ground operations and surface transport, and intervene if appropriate

we welcome the Strategy's recognition of the disturbance caused by helicopters, and encourage the Mayor to seek powers to regulate helicopter numbers and routes for non-emergency purposes.

We support the Mayor in pressing the government to legislate at an early date for levies to mitigate the environmental effects of aviation, and in his view that the proceeds should be distributed through Aviation Environment Funds for each airport (policy 56 and proposal 24).

Railway noise

Noise from railways of all types affects fewer people; it is reported as a serious problem by only about one-sixth as many people as place road traffic noise in that category. In the localities affected, however, noise from railways can cause significant annoyance and disturbance. This type of noise may become more apparent if there is success in efforts to reduce ambient noise from other sources, such as road traffic.

It is crucial that the need to minimise ambient noise is taken fully into account in maintenance regimes and in investment programmes to modernise and extend the railway system. The primary responsibility for ensuring this occurs must lie with the rail bodies. We therefore endorse the Mayor's objective 'to promote effective noise management on rail networks in London' (objective 4), but also urge him to play a proactive role if and when necessary in bringing different rail bodies together and ensuring there is a co-ordinated approach to noise issues.

As with roads, we support the idea that railway lines might be decked over in some cases to reduce ambient noise and create new sites for development, provided such schemes are otherwise acceptable in environmental and design terms.

There are some specific issues we wish to highlight:

computer models used for noise mapping must provide a realistic reflection of the noise generated by existing rail systems in London; we understand current models were calibrated for new railway lines, and do not therefore take into account the effects on noise levels from deterioration in the condition of track and rolling stock

noise levels on railway bridges often seen unduly high, especially on bridges across the Thames. We believe that renovation of some bridges has involved modifications which reduce the effectiveness with which sound is damped

design of warning devices (such as hooters) and rules for their use should take into account, alongside the paramount need to maintain safety, the desirability of avoiding unnecessary impacts from noise; it has been suggested, for example, that warning blasts from trains about to pass a platform without stopping could be dispensed with in some cases

voiced announcements add to the value of passenger information systems, and are especially useful to passengers with visual handicaps; but their use should be carefully reviewed in relation to the importance of the information conveyed and the number of passengers likely to benefit. Where a voiced announcement is justifiable, care should be

taken to ensure it is not louder than is necessary in that particular location. This issue is particularly important at suburban stations at night. In one clear example of an unnecessary announcement, an automated voice warns that approaching trains are not scheduled to stop at a platform which has been closed and inaccessible for a number of years.

Noise on rivers and canals

We support the policies and proposals for improving control of ambient noise on rivers and canals. In particular, we support the view that all boats hired out for parties should be subject to licensing, irrespective of the pier from which they operate; and that the licence should be used to control noise levels (policy 59).

Industrial noise

The planning system has an essential role in ensuring that London's industries have the opportunity to develop, and a sustainable system of waste management can be established, without inflicting unacceptable levels of noise on people in the areas surrounding industrial plants. National policies to prevent the construction of housing at inappropriately noisy locations have not been sufficient to prevent conflicts arising in some cases. The Mayor has included policies in the draft London Plan which address this issue. We urge him to ensure those policies are effectively implemented by borough councils.

We welcome the co-operation between the Mayor and the Environment Agency on this subject (policy 63).

Spatial planning, urban design and open spaces

The Mayor should ensure, as a high priority, that London studies, and takes full advantage of, progress made by other cities in developing approaches to urban design which minimise exposure to ambient noise. Noise barriers should be erected along railways and major roads bordering housing where the resulting benefit from reduced ambient noise levels outweighs the visual intrusion and any other side-effects. The Mayor must promote planning policies which will protect or create tranquil green spaces and civilised urban spaces.

Higher standards of sound insulation in buildings

New buildings should be designed and constructed in ways that minimise disturbance from noise, whether that is disturbance to the occupants from external noises, or disturbance to other occupants or people in the surrounding area from activities taking place within the building. The latter aspect becomes even more important in the light of the policies in the London Plan for higher densities of development and mixed uses. Ambient noise levels could be a critical factor in determining the acceptability of such an approach to London's future growth.

We urge the Mayor to press for mandatory high standards of sound insulation, especially internal sound insulation in affordable flats. We welcome and support his intention to promote exemplary developments which will set new standards in terms of ambient noise.

Impact of climate change

Climate change has implications for ambient noise. People will want to spend more time in the open air and leave their windows open more often, and that will increase the annoyance they suffer from existing sources of ambient noise. There is also a more significant implication in the probably much more widespread use of air conditioning. There has already been a large increase in the number of window-mounted air conditioning units, which give rise to high noise levels outside the building and are inefficient in their use of energy.

We support the Mayor's efforts to make new buildings in London much more energy-efficient, including encouraging reliance on passive ventilation and incorporation of heat pumps. We urge him:

to ensure, in promoting standards for sustainable design and construction, that mechanical ventilation systems in buildings make the minimum possible addition to ambient noise

to press for stringent European standards for window-mounted air conditioning units, which will, among other things, make them much quieter in operation.

Noise from leisure activities

We support measures, including establishing Entertainment Management Zones, to limit the noise disturbance caused by the use of buildings by the leisure industries, especially at night.

We urge the Mayor to initiate, in conjunction with the London boroughs and the Royal Parks Agency, a review of those park bye-laws which relate to noise sources and seek to maintain tranquillity in open spaces. Our impression is that such bye-laws do not yet reflect advances in technology such as the available power in portable stereo systems.

The authorities responsible for parks should stop keeping peacocks close to housing. They are not a native species; their shrieking cry causes particular disturbance, and is often repeated over long periods at night.

Relationship to the London Plan

It is essential that the key provisions of the Ambient Noise Strategy should be integrated into the London Plan (the Spatial Development Strategy for London). The draft London Plan contains a token section on noise (policy 4A.12 and paragraph 4A.29). Now that the Ambient Noise Strategy has appeared and been the subject of public consultation, we expect the Mayor to ensure that its provisions are taken much more fully into account in the final form of the London Plan, not merely in a separate section on noise but in all the contexts that are relevant.

The case for integration with the London Plan stems not only from the importance of urban design and development control for the control of ambient noise, but also from the aim of integrating land use and transport policies. It is equally important that relevant provisions of the Ambient Noise Strategy should be directly reflected in the revised Transport Strategy now being prepared, and we look to the Mayor to ensure that.

Other sources of noise

Neighbour noise is covered by separate legislation, but is an equally important issue. We consider that the police should in due course take over from the environmental health departments of local authorities responsibility for dealing with neighbour noise.

Many people are disturbed by pervasive and continuous low frequency noise which does not come from any apparent source. This appears to be a growing problem. We urge the Mayor to support ongoing research into the causes of such noise and possible ways of reducing it.

We endorse integrated noise management as a long-term objective.

Engaging the public

London Noise Survey

We support taking forward a London Noise Survey, and urge the Mayor to ensure the necessary resources for that will be available. Computer modelling of ambient noise levels needs to be validated by measurements of actual exposures in a representative range of situations.

Moreover, it is vitally important that, as well as physical measurements, a London Noise Survey produces representative data on people's reactions to noise. Although some data are available from the GLA London Household Survey, the London data used in the National Noise Attitude Surveys in 1990 and 2000 came only from outer London boroughs and, as noted above, not from any of the boroughs under the Heathrow flight path (see map in the margin of page 21 of the draft Strategy).

The Survey should be designed in a way that makes possible cross-correlations between people's reactions and physical measurements of the noise to which they are exposed.

Role of public consultation

If representative data on attitudes become available from a London Noise Survey, that will help considerably in the design of policies for reducing disturbance from ambient noise and in decisions on priorities.

It will remain essential, however, that there is direct consultation with the public, and with amenity and civic societies that represent the public, about the annoyance and disturbance they may be suffering from ambient noise and about measures proposed to be taken within London to remedy such problems.

Because of the uncertainties (discussed above) about the structure of future action plans to deal with ambient noise, it is not possible at this stage to frame detailed desiderata about public participation in their preparation and public scrutiny of their operation. However, we expect the Mayor to ensure that all the action plans for which he is directly or indirectly responsible will follow best practice in those respects.

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