

Comments on Mayor's Draft Noise Strategy June 2003

1. Introduction

1.1 The London Sustainable Development Commission was set by the Mayor in 2002 to advise him on sustainability issues in London. Further details on the Commission can be found on the GLA website:

http://www.london.gov.uk/mayor/sustainable-development/sustainable_development_commission.jsp

2. Methodology

2.1 In keeping with other English regions the Commission has developed a London Sustainable Development Framework. The Framework was launched and endorsed by the Mayor on the 5th June 2003. It consists of a vision and set of high level objectives grouped under the '4Rs': taking responsibility, developing respect, managing resources and getting results. This process of continual improvement is aimed at moving London towards a more sustainable future. The Framework and can be found on:

http://www.london.gov.uk/mayor/sustainable-development/docs/lfdc_framework.pdf

2.2 The Commission has used its Framework to assess and comment on the draft Noise strategy - see Section 4, below. Section 3 sets out a summary of the Commission's main comments drawn from the Framework appraisal.

3. Summary of Commission comments

3.1 The first citywide Noise Strategy of its kind in the UK is welcomed: much of its policy content reflects a sustainable approach. Noise is often seen as a marginal issue, yet as a key causal factor of conflict in cities it deserves far greater investment. Whilst the strategy is more concerned with ambient noise (as a result of requirements under the GLA Act), the Commission would like to see the Mayor being more active in seeking to promote solutions to neighbour/neighbourhood noise issues. The commitment to sustainable development set out in the overall vision for the strategy is welcomed (*"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"*).

3.2 In terms of **taking responsibility**, the dNS itself and its promotion of better information and standards is a significant step forward. However, the strategy fails to address how we take responsibility for air travel, one of the key issues for noise generation in London. In addition, there is a lack of powers and resources to implement the strategy.

3.3 The dNS is strong on **developing respect**. Noise management is a social balancing act in terms of seeking to protect everyone's right to enjoyment and achieve fulfilment. Convivial neighbourhoods characterise a liveable city – we accept a degree of noise as forming part of city life as it contributes to wider objectives, such as reducing crime and improving safety. Generally as a result of the dNS people should be able to enjoy a better quality of life as noise issues are better managed. Noise tends to disproportionately affect poorer people and the socially excluded – these communities should benefit. As population and densities inevitably increase, so will the challenge of managing noise at the community level. Again, the issue of air travel is a concern with many people set to continue to suffer unacceptable noise from planes using Heathrow – the strategy fails to tackle the issue of predicted air traffic growth beyond opposition to an additional runway at Heathrow.

3.4 The dNS will help in terms of **managing resources**. It aims to tackle noise pollution and outlines synergies with other environmental issues (waste, air quality, energy). It should result in improvements to open spaces, wildlife habitats and the public realm. It also promotes better green procurement, which should help drive resource efficiency. Various policies call for better standards for aeroplanes and the introduction of a tax on aviation fuel.

3.5 The dNS will assist significantly in terms of **getting results**, but this needs to be viewed within the challenging context of population, density and travel increases. The draft Noise Strategy (dNS) contains a raft of policies aimed at technological advance, better design and conflict resolution. It will improve the local environment for many people, much of which will benefit the poorer members of society and the socially excluded who often suffer more from noise. In terms of business and the economy, the dNS makes a reasonable contribution to job creation, improving the work environment and promoting better business transactions. Yet noise is a fairly specialised topic and one which cannot be expected to deliver positively on all issues.

3.6 However, there are areas of concern. There are no extra resources or powers available to the Mayor to implement the Strategy and much of its policy content is directed towards lobbying and persuading others, including government. Therefore, there is a concern about successful implementation of the strategy. Policy 56 and proposal 24 push for making the aviation industry pay its external costs, through Aviation Environment Funds. These could be used to help implement the strategy, as well as to offset greenhouse gas emissions. Such funds could have a role in getting Londoners to take responsibility for their air travel, but would need to be implemented alongside other measures.

3.7 Both air travel and car ownership/use are rising, or are predicted to rise, and these trends could severely blunt the technological advance and application that forms the bulk of the Strategy. With the London population and associated housing densities also increasing, the real challenge for the Strategy is to ensure that people don't suffer more noise intrusion as a result. Better design and technological advance are welcomed and necessary, but the Mayor needs to address these underlying trends, particularly in relation to travel patterns. For example, a reduction in overall traffic levels should result in a reduction in ambient noise levels.

3.8 Although following the requirements in the 1999 GLA Act, the Commission regrets that the dNS is mainly concerned with ambient noise. Neighbour/neighbourhood noise

is a significant issue for many people living in London, with most people experiencing problems at some time or other. One issue involves the way neighbourhood noise issues are dealt with between borough environmental health staff, the police and others. The dNS could have gone further with policies and proposals to clarify the issue and promote solutions (beyond policy 82). Better design, inputted as early as possible into the planning process, should help in this respect. Clearly this is an area where the Mayor will need to work closely with the London boroughs and the Commission supports measures to secure better funding for this work.

4. Appraisal of draft Noise Strategy using Commission's Framework

Overall objective

We will achieve environmental, social and economic development simultaneously; the improvement of one will not be to the detriment of another. Where trade offs between competing objectives are unavoidable, these will be transparent and minimised.

4.1 The dNS is good on promoting **social progress**. Noise minimisation and management will improve local communities who should also benefit from associated improvements in terms of air quality, health and fuel poverty. Better education and public information and improved housing design also deliver social benefits.

4.2 The dNS should also help to maintain and improve London's **economy**, in terms of its world city needs, movement of people and goods and regeneration. There is also a small contribution to job creation from the noise sector itself. Resource efficiency gains, more integrated transport systems and smoother traffic flows will also benefit the economy. There are some tensions, notably growth in air and road traffic, 24 hour city activity and increased regulation. The dNS seeks to minimise these conflicts. The effects of video conferencing and e-business on travel patterns are not explored to any extent.

4.3 The dNS is a significant step forward in terms of **environment protection**, aligning the first strategic noise policies for London with other environmental policy agendas. Climate change issues are addressed and the dNS is likely to have some benefit to the quality of parks, open spaces and the city's waterways. The dNS's noise minimisation agenda is also likely to have a synergistic effect on **resource use**, particularly in terms of energy (more efficient driving, promotion of hydrogen fuel cells, links between noise and energy insulation and better design).

4.4 One of the main challenges for the Strategy is to address noise issues in a city with a growing population, where densities are on the increase. As densities grow, does noise become more of a problem? Better design, inputted as early as possible, is promoted: higher standards will be necessary. The dNS aims to integrate noise management into design and operation, rather than as mitigation after the event. Policy 88 urges the government to provide an integrated framework for action for all levels of social, economic and environmental decision-making. Various other policies are set within a sustainable context.

4.5 The dNS also recognises that aviation growth presents some of the starkest tensions between environment and economy (paragraph 21). Whilst there is much welcome policy content relating to aircraft noise, the dNS supports the view that "London has been becoming more socially and economically dependent on air transport" and it looks

to government for decisions on national aviation policy. Yet with a growing consensus that the air transport industry is growing faster than technological and operational advances to reduce environmental impacts at source, the dNS may prove weak on tackling aircraft noise affecting Londoners – one of the key issues for the strategy.

4.6 The London Sustainable Development Commission is commenting separately on the national air travel consultation and intends to do more work on this issue over the coming months.

Taking responsibility

1. As citizens of a world city, we will be aware of the impact of our actions on the rest of the UK and beyond, and will take a responsible world leadership role which contributes to the planet's sustainability.

4.7 The dNS is the first citywide noise strategy of its kind in the UK and is therefore to be welcomed as providing leadership for others. However, the Mayor has been given no new powers or new money specifically to reduce noise.

4.8 The dNS makes the links between London's world city status and air transport, but contains little innovative proposals for showing world leadership on sustainable air travel or getting Londoners to take responsibility for their air travel – beyond calls for improvements in technology and a tax on aviation fuel.

4.9 Policy 38 supports a review of the airport noise index currently used at Heathrow and other UK airports – proposing an extension to encompass issues related to sleeping patterns.

2. All of us - individuals, households, businesses, local and regional government, voluntary groups -- will have the information, knowledge, motivation and support to help us to take both short and longer-term decisions that will make us and our city more sustainable.

4.10 With little new powers or resources, the dNS is strong on providing information, knowledge and motivation to tackle noise. Policies target better driving technique, better assessments for noise, improved communication and specifics relating to housing design, schools and hospitals.

3. We will seek new and creative ways to overcome the constraints of time and money that prevent us from taking effective decisions. We will ensure that these decisions are informed by a long-term perspective.

4.11 Lacking in extra resources of its own, the dNS contains policy recommendations urging the government and others to devote more resources for noise management. In particular, policies urge the government to set up two new funds – a London Ambient Noise Fund and a Domestic Noise Fund. Using noise-related fines to improve noise management and polluter-pays levies are also suggested as possibilities. Good practice and improved tools will also help to overcome constraints to some degree. Partnership working is promoted which should help to promote long-term thinking.

4.12 Proposal 24 concerning Aviation Environment Funds could help to implement noise management schemes (and other environmental schemes) but need to be designed to persuade Londoners to take responsibility for their air travel.

4. We will build and sustain a powerful sense of ownership and responsibility for our city, with civic participation as the norm.

4.13 Public consultation, better communication and listening to the public are features of the dNS. Public attitude surveys and working in partnership with the local population appear in a number of policies.

4.14 However, in the specific area of late night entertainment noise issues, the dNS looks to the boroughs to indicate potential conflicts via their Unitary Development Plans (UDPs) – without stressing the need for civic engagement and participation.

Developing respect

5. Our city will have a culture of tolerance, fairness and respect, for people and the environment, recognising London's diversity as its key strength. The right of all London's citizens and communities to pursue fulfilment will be assured, so long as this does not infringe the rights of others.

4.15 In general, the dNS considers that poorer and socially excluded groups are more likely to live in noisier environments, because of their lower incomes and therefore lack of choice about where they live. However, this is not always the case - aeroplane noise from Heathrow cuts across the capital's historic pattern of disadvantage, affecting many of the wealthier parts of London. Strengthening noise standards for cars may impact more on the poorest car owners. Proposal 22 requires TfL to identify and address the equalities implications of differences in noise exposure *as far as possible*.

4.16 Nevertheless, the dNS should improve tolerance and respect and uphold the rights of individuals and communities to achieve fulfilment. Unwanted noise intrusion into people's lives should be reduced. In the dNS, the Mayor reiterates his support for the banning of night flights. The review of the London Lorry Ban should and must take account of legitimate residents' concerns.

6. Our city will be a place where everyone feels at ease and is able to enjoy life. All who work, live and play in the city will be able to pursue their objectives in peace, free from the threat of crime, violence or intrusion.

4.17 The dNS recognises that minimising noise is a social balancing act – but overall the strategy should contribute positively to a more peaceful capital with less noise intrusion. However, this needs to be seen in the context of population increases, higher densities, and increases in car ownership and air travel.

4.18 There is little policy content relating to crime and safety, beyond mention of road safety issues. More could be done exploring the links between noise management methods and designing-out crime.

7. Our communities will be dynamic, stable, adaptable, innovative, progressive – creating a city in which conflicts will be resolved as part of a transparent and participatory process.

4.19 The dNS will ensure that innovative noise management technologies will be promoted within London, enabling communities to better manage any potential disturbance. The wealth of noise reduction measures and partnership working included in the dNS will improve the cohesion of communities.

4.20 Improving information and communication, coupled with revamped or new standards and assessment techniques will all serve to increase transparency and lead to better decision-making.

4.21 However, on the main issue of aircraft noise, the dNS could have promoted innovative participatory measures to enable Londoners to have their say on improving their noise environment. There is increasing disagreement about the way aircraft noise is measured (averaging) whilst Boroughs and Londoners should be able to find out how many aircraft are flying in their area and at what altitudes. A more innovative participatory measure may also help avoid legal conflict such as the Heathrow night flights (Hatton) case.

Managing resources

8. We will protect and improve the city's natural ecosystems, its biodiversity, its open spaces and its built environment. We will help to protect the wider regional, national and international environments with which London has links.

4.22 There is little in the dNS on biodiversity issues but in reality there are few actual links. The strategy does aim to improve the experience of visiting parks and open spaces by seeking to reduce intrusive ambient noise. Noise improvement measures are planned for the public realm including the initiative over the '100 public spaces'. Tree planting and landscaping is one means of creating sound barriers.

4.23 On wider environmental issues, the dNS calls for the introduction of aviation fuel tax and proposes the government introduce Aviation Environment Funds to be used to mitigate the environmental impacts of aviation.

9. We will limit and deal with our pollution, and use energy and material resources prudently, efficiently and effectively, including re-using and recycling our residual waste.

4.24 Noise is described as the 'Cinderella pollutant'. The dNS is clearly a major step forward in tackling this form of pollution in London.

4.25 The dNS attempts to make links to produce synergies with other resource issues such as energy, fuel poverty, air quality and waste management, particularly in relation to building design (noise barriers doubling as solar panels).

4.26 The dNS promotes green procurement – this will also be an important driver for resource efficiency and sustainable development.

Getting results

10. We will make consistent economic progress – not necessarily always growth – to enable wider economic, social and environmental objectives to be

pursued both in London and beyond. Business transactions in London will be conducted to high ethical standards.

4.27 London's economical and physical growth is a major challenge in terms of reducing noise. The population is growing, densities are increasing and increasingly parts of London are aspiring towards 24 hour city status. Predicted growth in air travel and car ownership are likely to blunt the benefits accrued from technological advance.

4.28 The dNS makes the case for economic development and job creation in relation to the noise management sector and technological innovation, and makes specific reference to the potential of deprived areas for 'noise-related' employment. In improving the visitor experience and people's working and living environment, the dNS will also contribute positively to London's economy. Development will have to pay more attention to noise issues which could increase costs, but better design will reap benefits in terms of creating a more attractive environment for all.

4.29 Other policies will also benefit London's economy, such as the promotion of more rapid completion of road works and the evolution of the hydrogen economy.

4.30 The promotion of green procurement should aid better business transactions.

11. All the different parts of our economy will consistently invest in new technologies, new solutions, new plans and new ideas that contribute to achieving social, economic and environmental objectives simultaneously.

4.31 Technological improvement is a major feature of the dNS. However, it is also noted that such advances could be blunted by growth in various transport sectors, particularly aviation. Technological advance needs to be progressed alongside other measures to deliver policy advancement.

12. All forms of work will be recognised and valued. Paid employment will be plentiful.

4.32 The dNS will assist in limited job creation in the specialist sector and help improve the working environment for many. It also seeks to look at the potential of such employment in deprived areas

13. We will be healthy and fulfilled – through living in good housing, with wide opportunities to develop as individuals and communities, through access to services, good quality food, green space and cultural, sporting and leisure activities.

4.33 The dNS will contribute to better housing through the promotion of better design, including social housing. Access should be improved in a variety of ways – quieter, safer, less polluting and more efficient. Better public transport around airports is promoted.

4.34 The dNS should improve mixed use and town centre management and help alleviate late night conflicts (e.g. entertainment/24 hour city issues). The input of local communities needs to be essential to this process.

4.35 The public experience in London's open spaces and the public realm should also be improved.

