



Llywodraeth Cymru
Welsh Government

Number: 47706

Welsh Government Consultation Document

Noise and Soundscape Plan for Wales 2023-2028

Consultation questions

Date of issue: 26 June 2023

Action required: Responses by 2 October 2023

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

Overview

We would like to hear your views on Welsh Government policies concerning the airborne sound environment. We have set out a summary of the evidence, our current policies and our priorities for the next five years in the draft Noise and Soundscape Plan 2023-2028. Once adopted, this will serve as our national strategy on soundscapes until its next review and update, which is expected to occur in 2028.

How to respond

This consultation document sets out a number of questions.

Responses may be submitted in any of the following ways:

Web: <https://gov.wales/consultations>

Email: environmentalnoise@gov.wales

Post: Noise and Soundscape Plan consultation
Environmental Protection Division
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

Contact details

Please see above.

This document is also available in Welsh: <https://llyw.cymru/ymgyngoriadau>

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Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. The lawful basis for processing information in this data collection exercise is our public task; that is, exercising our official authority to undertake the core role and functions of the Welsh Government (Art 6(1)(e)).

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For further details about the information the Welsh Government holds and its use, or if you want to exercise your rights under the UK GDPR, please see contact details below:

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Cathays Park
Cardiff
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e-mail: dataprotectionofficer@gov.wales

The contact details for the Information
Commissioner's Office are:
Wycliffe House
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Tel: 0303 123 1113
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Consultation Response Form

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Introduction

Noise, meaning unwanted or harmful sound, affects health and well-being in a number of ways, including sleep disturbance, annoyance, impacts on learning, decreased productivity, hearing loss and increased risk of cardiovascular disease. It can arise from a wide variety of human activities including domestic, commercial and transportation sources.

Soundscape is defined as the acoustic (or sound) environment as perceived or experienced and/or understood by a person or people, in context. It includes the sounds people do want to hear as well as the noises they don't. [Planning Policy Wales](#) lists **appropriate soundscapes**, meaning the right sound environment in the right time and place, among our National Sustainable Placemaking Outcomes.

In 2018, we published the [Noise and Soundscape Action Plan 2018-2023](#) (NSAP), which reframed noise policy in Wales in terms of the Well-being of Future Generations (Wales) Act 2015 ("the WFG Act"). It resulted in Wales being recognised as the first nation to include soundscapes in national policy, and it was referenced in the United Nations Environment Programme's [Frontiers 2022](#) report.

Earlier this year, we introduced the Environment (Air Quality and Soundscapes) (Wales) Bill, which will require us to produce a national strategy on soundscapes. In 2018, we did this voluntarily in the form of the NSAP, but we believe giving the new Noise and Soundscape Plan 2023-2028 a more solid legal foundation will raise its profile and increase its effectiveness in guiding informed decision-making.

The draft Noise and Soundscape Plan 2023-2028 retains and refines the core messages of the NSAP, which include:

- our ambition being appropriate soundscapes;
- our commitment to embed the five ways of working in the WFG Act; and
- our commitment to join up action on noise and air quality wherever it makes sense to do so.

The draft Plan covers new topics that have come to the fore within the last five years, such as issues around remote working, aural diversity, air source heat pumps, changes in speed limits, and fireworks. It also sets out what we have delivered over the last five years, such as noise mitigation works completed on the trunk road network.

Developments in planning policy and guidance, notably work towards publishing and implementing a new Technical Advice Note (TAN 11) and related soundscape design guidance, on which we recently consulted, are also included in the Plan, as are our latest noise maps and results from the National Survey for Wales 2021-22.

People will experience the benefits of a transition from traditional noise control to a more inclusive soundscape-based approach when they can see public bodies taking on board local communities' views on their sound environments, in terms of both what they value and what they think needs to be improved.

Consultation questions

Question 1: Appropriate soundscapes

Our goal is to create the right sound environment in the right place at the right time. We recognise that different people will take different views as to what is 'right' for a given context. For decision-makers it will often come down to striking the right balance between competing viewpoints, whilst maintaining a diversity of sound environments in our villages, towns and cities, so that there is somewhere to suit everyone.

- a) What do you think would be the characteristics of a village, town or city that had achieved "appropriate soundscapes"?

The Welsh Government recognises that noise is a serious public health issue. The scale of the problem is evidenced by the latest report produced by the UK Health Security Agency (UKHSA) on noise and health¹. Research from the UKHSA suggests that in 2018 130,000 healthy life years were lost in the UK due to noise pollution and that 40% of the population were exposed to harmful levels of noise pollution from road traffic.

We are concerned that too much emphasis is being given to appropriate soundscapes. We commend the Welsh Government for encouraging soundscape approaches and recognise that these new approaches represent a valuable addition to noise management programmes. However, we consider that, first and foremost, the focus should be on protecting and improving health and quality of life. Noise can affect health and quality of life during the day and night. But exposure to noise at night, when people are not conscious or aware of the soundscape inside their bedrooms, is a serious concern. The focus must therefore be on reducing excessive levels of noise inside bedrooms at night in order to reduce objective impacts on sleep rather than subjective impacts of noise. There is no need to develop new approaches to understand what the problem is or the scale of the problem. What we need is a specific set of proposals that will tackle noise pollution and reduce the scale of the health and quality of life burden imposed on Welsh residents.

- b) What are the main barriers or obstacles to achieving appropriate soundscapes in reality?

The main barrier is the lack of allocated funding and resources to reduce noise impacts on health and quality of life. The scale of funding currently deployed is not proportionate to the scale of the public health burden and a lot more needs to be done to resource noise management programmes which are aligned with wider public health improvement programmes.

¹ Calvin Jephcote et al., 'Spatial assessment of the attributable burden of disease due to transportation noise in England', *Environment International*, vol. 178 (7 May 2023): [Spatial assessment of the attributable burden of disease due to transportation noise in England - ScienceDirect](#) [accessed 4 October 2023]

A lack of collaboration and integration between government departments, transport providers, health services and local government is also impeding progress.

There is also a lack of know-how and evidence on the most cost-effective solutions to improve health and quality of life, especially in relation to interventions. Specific programmes need to be developed to improve the evidence base. Methodologies need to be developed that will allow evidence from intervention case studies to be pooled to increase the statistical accuracy of the evidence base and to allow reliable comparisons to be made between different types of intervention.

Other barriers include competing community desires and effective engagement.

c) How should we seek to overcome those barriers?

The plan should set out clear objectives and targets for managing noise to improve health and quality of life. We strongly recommend that the plan should set out a clear and coherent plan for reducing the current burden of noise on health and quality of life in Wales. This should be underpinned by up-to-date cost benefit analysis (not the current outdated webTAG method). A targeted and costed noise reduction programme should be developed to reduce the burden of noise on health and quality of life on a progressive basis. The priority for action should be placed on those communities facing: a) the greatest risk to health and quality of life from noise exposure, and b) risks to health and quality of life from other environmental and housing factors. Indices of health and social deprivation should be used as part of the noise action planning process.

Review processes need to be built in to improve the effectiveness and efficiency of any noise management programmes.

Question 2: Applying the five ways of working

The Welsh Government expects public bodies subject to the WFG Act – and encourages everybody else – to follow the five ways of working in that Act when carrying out activities that may affect soundscapes. These ways of working are:

- looking to the long term so that we do not compromise the ability of future generations to meet their own needs;
- taking an integrated approach;
- involving a diversity of the population in the decisions affecting them;
- working with others in a collaborative way to find shared sustainable solutions;
- and
- acting to prevent problems from occurring or getting worse.

a) What do you think this would look like in practice?

We agree with these principles and would positively endorse them.

Noise can significantly impact on health and quality of life. See, for example, the

latest report produced by the UKHSA on noise and health. However, noise is one of several factors affecting the natural and built environment which can affect health and quality of life. It is imperative therefore that any action plans and interventions are holistic. It is also important that any interventions are based upon the best available evidence on health and quality of life. In this regard, we commend the broad approach set out in the Welsh Government's policies and the draft action plan to integrate noise and air quality management in order to maximise opportunities to improve health and quality of life where possible and to minimise tensions where they may arise.

However, noise action planning should not be limited to the integration of noise and air quality management. It should go further and consider all factors affecting health and quality of life. For example, the Building Regulations set out minimum standards for health and safety, but they are not always properly integrated to achieve optimum outcomes. There is a concern that the new regulations on overheating are not based on the best available evidence and can lead to sub-optimal designs for new dwellings located in areas exposed to high levels of noise and poor air quality. We also consider that noise and air quality are just two of several factors in the built environment that can impact on health and quality of life. People already exposed to excessive noise and poor air quality are more likely to be socially deprived and suffer from a range of poor housing conditions. Noise and air quality management should therefore be properly integrated with housing policies and wider policies to tackle health inequalities. It is imperative therefore that holistic ways of working need to be applied across all areas of national and local government and that all factors affecting health and quality of life need to be considered.

- b) Can you give examples of how a public body in Wales might demonstrate all five ways of working when taking a decision that is likely to affect people's sound environment?

The Welsh Government needs to work closely and collaboratively with local government and health agencies on noise and air quality matters to ensure that resources are deployed efficiently and cost-effective solutions are used to protect and improve health and quality of life. Interventions should be designed, developed and implemented with community participation. The private sector should also be engaged to identify and establish the most cost-effective solutions and to develop innovation programmes. The Welsh Government should also engage with academic and research institutions to improve the evidence base on health and quality of life, especially in relation to intervention studies.

There is also a need to move beyond policy statements and find cost-effective solutions that will protect and improve health and quality of life. At this time, we do not sufficiently understand what management solutions and interventions work well and what do not work well. We would recommend therefore that the Welsh Government sets up a multi-disciplinary task force to develop pilot projects to improve the health of communities exposed to high levels of noise and poor air quality. The pilot projects should reflect the consensus on how best to improve

health and quality of life and to measure changes in health and quality of life resulting from any interventions. This work programme should be fully funded and resourced.

Question 3: Aural diversity and the sound generated by human activities

The Welsh Government recognises that everyone experiences sounds differently, and some people are more affected by noise than others, for example people with autism or those who work night shifts. But we also recognise the need to treat fairly and consistently those people who carry out activities that generate sounds or who may enjoy hearing those sounds. We don't want a Wales that is silent.

We have suggested that part of the solution to balancing people's various needs and expectations is to encourage a diversity of sound environments across our communities, and to make those responsible for bringing about a change responsible for managing that change. (This is sometimes referred to as the "agent of change principle".) However, these have their limitations.

How do you think society should address in a fair and balanced way the dilemma of sound generated in the course of people's lives being experienced by other people as unwanted noise?

It must be recognised that some people and groups are more vulnerable to noise exposure than others. We also need to recognise that vulnerability to noise is not confined to small proportions of the community and can affect significant groups of people, for example people suffering from poor mental health.

As such we need to stop basing decisions based on a notional average person and have regard to the needs of persons more vulnerable to the adverse effects of noise.

Question 4: Noise and air quality

Road vehicle exhaust pipes and tyre/road interactions; aircraft in flight; diesel trains; extractor fans; construction; excavation; demolition; waste handling; industrial combustion sources; diesel generators; fireworks. All generate both air and noise pollution, and broadly speaking the air and noise pollution they generate affect most the same people, namely those who live their lives closest to the sources. The Welsh Government is therefore committed to ensure that national and local action to improve air quality seeks also to maximise the potential benefits to soundscapes.

- a) Which actions being taken by the Welsh Government and local authorities over the next five years to improve air quality in Wales do you think present the greatest opportunities to deliver additional benefits in terms of noise reduction and better soundscapes?

It is not possible to answer this question properly because no cost-benefit analysis has been presented for tackling the health burden imposed by noise and air pollution. The action planning process must be underpinned by cost-benefit analysis

of the health benefits arising from different trends and interventions. We are also hampered in answering this question by the fact that we have little evidence of the cost-effectiveness of different interventions which aim to tackle the health burden caused by noise and poor air quality.

In general terms, it can be stated that it will be a wasted opportunity to implement single issue action plans or programmes which only deal with noise or air quality. Action planning for noise and air quality should be a combined and integrated process.

Noise exposure maps should be overlaid with air quality maps to identify the communities that face the greatest burden to health and quality of life in the future and who are less likely to benefit from national trends such as the benefits that might be expected with vehicle fleet renewal. Local priority and action plans should be developed for those communities least likely to benefit from national trends.

The proposals to use evidence-based approaches are key to improving health and quality of life.

b) What more do you think we should be doing (if anything) to link up noise and air quality policy in Wales?

The integration of noise and air quality in the plan is progressive and is commended. It makes every sense to integrate noise and air quality management. However, it is very difficult to maximise opportunities and deal with the tensions without good evidence on what works and what does not work. We would encourage the Welsh Government therefore to work with the local authorities to develop exemplar intervention projects which improve health and quality of life for those people most exposed to poor air quality and excessive noise.

Question 5: The draft Noise and Soundscape Plan 2023-2028

The draft Noise and Soundscape Plan accompanies this consultation document. It contains Welsh Government policies and information relating to the sound environment that we would like devolved public authorities in Wales to have regard to when exercising functions that may affect soundscapes in Wales over the next five years.

Soundscape approaches are an emerging discipline, but one that is very much in keeping with the principles of the Well-being of Future Generations (Wales) Act 2015. By promoting soundscape approaches we are at the forefront of moving away from a purely data-driven approach to noise management, to one that acknowledges the diversity of our population and the importance of considering context and involving communities in decisions that affect them.

We accept that neither local authorities nor private sector consultancies in Wales currently have the level of expertise and capacity in soundscape techniques that we

would like to see them possess in the medium-to-long term. However, if skills and experience relating to soundscape increase over the course of the next five years, a revised national soundscapes strategy in 2028 could be more ambitious in terms of its expectations of practitioners than the one we are consulting on this year.

Do you think we are striking the right balance for now between avoiding creating new burdens for public authorities and businesses in Wales, and driving the transition from traditional noise management practices to a more soundscape-centred approach that puts people and context at the heart of decision-making?

We do not consider that the right balance is being struck for the reasons explained. The focus needs to be on protecting and enhancing health and quality of life.

We consider that the draft plan lacks ambition and specificity. A clear and coherent action programme, with specified timeframes, is needed to reduce the burden of noise on health and quality of life.

It is not considered that participatory approaches are exclusive to soundscape approaches. In any event, it is considered that community engagement and participation is essential to achieve optimal outcomes where relevant and appropriate. There is a concern about:

- *the resource implications for implementing these approaches for many applications,*
- *the lack of clear criteria for decision making,*
- *the applicability of soundscape approaches in some areas such as neighbour noise complaints,*
- *the reliability of the methods.*

We would welcome an opportunity to engage with the Welsh Government to discuss those aspects of soundscape approaches that are valuable and those that need to be developed further working in collaboration with local authorities.

Question 6: The draft Noise and Soundscape Plan 2023-2028 (continued)

The draft Noise and Soundscape Plan 2023-2028 contains updated Welsh Government policies for the types of sound previously considered in the Noise and Soundscape Action Plan 2018-2023, such as transport, industry and the sounds of nature, along with new sections covering other types of sound that have come to the fore in the last five years, such as fireworks, air source heat pumps and the sounds people experience when working from home.

a) Are there any important points relating to Wales's airborne sound environment that we have missed?

As explained, there needs to be strong links between the plan and policies to reduce carbon emissions. There also need to be stronger links to the wider determinants of health and quality of life.

The plan says very little about retrofitting of existing homes. However, we know that

energy used in poorly insulated homes with inefficient heating systems contributes a significant proportion of carbon emissions. We also know that a lot of public health issues are caused by poor housing conditions. This includes poor noise and air quality indoors, resulting either from the ingress of pollutants from outside or generated inside.

We would urge the Welsh Government to move away from single issue retrofit strategies and develop retrofit strategies for health and sustainability for the communities that are most socially deprived and suffer the greatest health burden from poor housing conditions.

Retrofitting should be included as an integral part of the plan.

We would also encourage the government to develop innovation programmes which aim to improve the uptake and implementation of retrofit schemes, and which improve the cost-effectiveness of retrofit solutions.

It is considered that there is a lack of integration between the noise plan and housing policies/programmes.

There is a concern about the lack of integration between the noise plan and the Building Regulations and little to promote alignment between Building Regulations and planning guidance.

b) For the topics that we have covered, do you disagree with any of the items that we have outlined in the draft Plan?

We have specific comments on how the plan could be strengthened. These are set out below using similar headings to the ones used in the draft plan.

New Development

Good acoustic design is rarely achieved because developers and their consultants rarely, if at all, consider site layout, building typology and room orientation at the earliest stages of the design. TAN 11 should be strengthened to encourage good acoustic design as early as possible.

There is a significant concern that good acoustic design is not currently achieved because developers and their consultants typically regard the use of mechanical ventilation/cooling as the mitigation option of choice where external levels are high. The principles of good design (as opposed to solely good acoustic design) should consider all options for mitigation, including passive designs that allow natural ventilation where windows stay open. It is recognised that sustainable options for heating may wish to incorporate Mechanical Ventilation with Heat Recovery systems to minimise energy loss, which may mean that use of premises will need to be considered carefully within any design to optimise noise protection whilst facilitating appropriate levels of ventilation and cooling to remove excess heat during the hot summer months as necessary. Moreover, it is possible that any noise policy will

conflict with sustainability objectives, for example in relation to generation of sustainable heat, use of air pumps etc.

We have expressed serious concerns about the incompatibility of standards related to acoustic design standards². We strongly recommend the use of the noise criteria set out in the ProPG and the use of consistent numerical standards to avoid inconsistency. It should not be the case that unsafe levels of noise should be permitted whilst addressing excess heat. As noted previously the design process should consider all relevant constraints.

Good acoustic design is not being achieved because consultants acting on behalf of developers do not always follow the guidance in the ProPG. Local authorities also need more support in terms of encouraging good acoustic design. We recently published a document to assist local authorities with the imposition of noise conditions to encourage good acoustic design. We ask that this document is considered and that guidance is offered to local authorities on the appropriate use of conditions to achieve good acoustic design. Furthermore, we would encourage the Welsh Government to develop and promote local policies and practices that will encourage good acoustic design.

Decarbonising our society

We recommend that our guidance should be used first with the MCS procedure used as a backstop. In addition, the plan should call for the MCS system to be updated as a matter of urgency.

The plan should be stronger on wind turbine noise and include an update the ETSU guidance or, at least, provide supplementary guidance. The plan should also set out a mechanism for financial incentivisation because there is evidence that financial contributions reduce opposition and annoyance to noise. The CIEH should be represented on any noise expert groups.

Natural soundscapes

This aspect of the plan is progressive and should be applauded.

Transportation

Noise from transportation represents a significant public health risk (see the latest study issued by the UK Health Security Agency - <https://ukhsa.blog.gov.uk/2023/06/29/noise-pollution-mapping-the-health-impacts-of-transportation-noise-in-england/>).

The draft plan states:

² ProPG and AVOG. Acoustics Bulletin July/August 2021

The Welsh Government intends to use the new noise maps to identify priority areas where noise mitigation may be required between 2023 and 2028. Priority areas will be determined based on modelled noise levels, population affected and perception of noise.

The plan should go further and set out a coherent plan for improving the health and quality of life for those exposed to harmful levels of noise and air quality on a prioritised basis. Targets should be set, underpinned by cost benefit analysis and the spatial study presented by the Health Security Agency. There should be committed funding for implementing action plans and interventions.

We should encourage innovation and better use of technology, including innovation on noise barriers.

Retrofitting should also be used as part of the measures used to tackle excessive noise. Again, we should be looking at innovation in sound insulation measures. People exposed to excessive noise and poor air quality tend to be the most socially deprived and are also more likely to suffer from poor housing conditions. Social deprivation and health indices should be used to identify priority areas. Interventions should be multi-faceted and consider tackling excessive noise and poor air quality. We should also explore wider opportunities to tackle carbon emissions and wider determinants of poor health as well.

We recommend having a local authority liaison group as well as the Rail Safety and Standards Board Working Group. We also recommend specific guidance on dealing with noise nuisance from railways as part of a coherent action plan.

Question 7: Expert advice on soundscapes

It has been suggested that the Welsh Government should establish an expert advisory panel on soundscapes, to inform its policies in this area.

Imagine we have established an expert advisory panel on soundscapes to help us implement our current strategy and develop policies to include in our next one in 2028, and suppose that panel had the capacity to advise us on one big question relating to noise and soundscape management each calendar year.

- a) What would be your top five questions for the panel to consider in the five calendar years from 2024 to 2028?

What method should be used to undertake the cost benefit analysis? How should the noise exposure response functions in webTAG be updated?

What are the most cost-effective methods for improving health and quality of life for those communities facing the greatest burden on health and quality of life?

What methods should be used for measuring changes in all aspects of health and quality of life resulting from noise interventions or proposals?

What are the best ways of encouraging innovation into the noise management programmes?

What methods should be used to measure and quantify the effectiveness of community participation approaches?

b) Are there any items that you feel need to be prioritised, and if so, why?

There is an urgent need to implement pilot projects to provide exemplars and to provide the evidence needed on cost-effective solutions that can be deployed to improve health and quality of life.

Question 8: Welsh language

We would like to know your views on the effects that the Welsh Government's policies on noise and soundscapes would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Question 9: Welsh language (continued)

Please also explain how you believe the Welsh Government's policies on noise and soundscapes could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Question 10: Any other comments

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: