Thank you for your invitation to send written responses about these matters to your Select Committee. I have considerable experience working as a professional planner in United Kingdom. I wish to raise particular concerns about some current governmental practises over rural soundscapes.

It is now more common for people to take greater interest in their surrounding soundscapes of our natural environment and rural communities. Contemporary changes are increasing noise impacts in the countryside, for example, effecting the rapid provision of double glazing windows for rural houses partly as noise attenuation measure and partly as a thermal insulation measures in one lifetime. Rural soundscapes are worthy of your attention.

There is general acceptance that rural resident populations value the rural characteristics such as fresh air, good local food, lots of open land, beautiful scenery and quiet as well as those who visit these areas from urban areas.

The English countryside is our great collaborative masterpiece to be sustained for future generations. People like Wordsworth and Ruskin to Octavia Hill to Patrick Abercrombie have all instinctively understood the responsibility for our countryside. Contemporaries like Andrew Motion, Melvyn Bragg, Simon Jenkins and Max Hastings continue to restate its importance.

Our rural soundscape is an integral part of the countryside yet its significance does not receive the attention it deserves.

Whilst we are right to emphasise natural beauty to justify special designations like National Parks and Areas of Outstanding Natural Beauty, we cannot assume the quality of their soundscape will remain unchanged, say from their sound characteristics present at the time of their designation and deserve more attention because they may well be more sensitive to change.

It is true that some recognition has been given to tranquillity as a special characteristic and this can lead to some coverage in their Management Plans. The picture is worse for some of our designated Areas of Outstanding Natural Beauty like the Chilterns AONB which serves a large visitor population.
For the remaining countryside without special designations, these are no less valued by the public but decisions are as a result of discretion being exercised because the same regulatory framework applies for those in use for higher background noise levels. It is far from clear whether the ability to exercise local discretion is taken in rural area to address these matters. It is acknowledged that there are equivalent concerns about the higher levels of noise are experienced by urban dwellers and absence of quieter places in urban areas but the value placed upon quietness in rural settings deserves better actions. I want to draw the Government's attention to these.

I would draw attention to the report by Saint Gobain, a glass supplier which states that 70% of people (urban and rural) admit to feeling harassed by noise and imply an escape to the countryside might be the only option. It might well be a mistaken belief that our countryside is necessarily a quiet haven.

Pilkington trade literature for windows suggests that a quiet garden would represent a noise reading of 28dBA and Saint-Gobain Glass Literature gives a similar figure for a quiet forest. These figures will generally be lower overnight. I would ask you to keep these figures in mind.

Research into the impact of unwanted noise over the years and efficacy of current practice in rural areas remains particularly thin. The evidence suggests the Government priorities have lain elsewhere. Whilst this has meant what efforts have been made to identify the noisiest concerns, it has largely neglected the countryside, perhaps because these are seen of lesser importance or possibly for fear of adversely affecting the rural economy.

Government noise policy has been slow to alter its policy direction regarding noise control and even though there are signs that a change in right direction is taking place, there are significant failings to prevent or reduce adverse noise impacts.

It has always been the case that efforts on noise control largely cover impact of people’s way of life inside dwellings. Even here, there is really only limited success as it can be deemed acceptable to take down to the bare minimum, requiring windows to stay closed if discretion is exercised by the local decision maker.

It may come as a surprise to house owners that the regulations are far less stringent for enjoying residential amenities around dwellings, often considered of considerable importance to those living in rural settings. Government advice suggests measurements of noise from noise generated from neighbouring development be taken 1m away from the nearest habitable window of the neighbouring dwelling rather than at the side boundary itself.
The emergence of noise laws has largely been historic. Much of UK noise law has come from balancing the interests of industry in their own designated use zones or for those in mixed use zones. Residential areas, hospital and schools are seen as most sensitive. Whilst past noise policy will avoid stating specific upper limits, these can be found in accompanying guidance and these remain in use largely unchanged. Information given to the public about local decisions will generally imply that the continuing noise levels or the noise calculation in the assessment is within the limit.

Their position is really assisted by no laws governing low frequency noise in UK and no specific noise laws for residential areas.

Difficulties arise because UK noise laws have previously relied upon common application of ‘upper permissible limits’ regardless of background noise levels in existence. This approach has been strongly criticised because of the automatic acceptance of the highest permissible figure regardless of surrounding background noise level. It means the gap will be larger in rural settings.

One example would be domestic heating equipment which has historically been internal and covered by building regulations and environmental health dealing with residual noise problems outside. The Government’s encouragement of Microgeneration programme permits new external plant such as air source heat pumps for domestic dwellings. Poor equipment and location can create disamenity and nuisance problems for neighbours yet are accepted because of higher noise emission level(based upon the Government assumption of 40 dBA background noise level for the UK and the equivalent sound reduction requirements found in the traditional building envelope not being required).

Interestingly most noise specifications of permanent plant machinery for domestic dwellings such as air source heat pumps(59dBA) fall above the identified figure of 55dBA in the World Health Organisation’s 1999 noise guidelines treated as falling in the serious annoyance category. It relies upon noise levels reducing away from the noise source.

The alternative approach of prevent, reduce or adapt really implies that greater efforts should be made to accept zero or small incremental increases to take place. However past custom and practice are proving extremely difficult to change.

These are very important matters for those living in rural property in compact settlements or those faced with new development with external noisy plant close to their boundaries at ground level and where low background noise levels prevail. It is unlikely that developers will self-regulate because of the loss of investment. This places the burden upon the local
government regulatory framework with its reliance upon guidance largely based upon compliance with higher background noise levels still in place. Indeed staff still need to acknowledge that Heat Pumps are noisy and create nuisance problems because some of the Government information suggests that these are quiet.

Indeed developers has seen the Government’s position on Air Source Heat Pumps as giving the green light for developers to avoid seeking planning permission for new development without much fear of enforcement.

I consider that the Government approach to the larger Air Source Heat Pumps to be flawed. There has been a failure to acknowledge the effects upon those in rural settings because of the inflated figure of 42dBa set by permitted planning development for existing buildings whereas background noise levels are much lower for rural settings. Whereas the Welsh Office suggest Air Source Heat Pumps are noisy and require attention during the original site design and the Scottish Government office point to strong concerns about effects in their Impact Statement, the English Government office fail to address this as much of a rural matter and different views from the devolved government offices about whether they are noisy or not.

Professional voices from the Institute of Acoustics and all of the regional associations submitted strong criticisms but these were not fully reflected in Government’s Impact Statements. Furthermore, no independent scrutiny takes place of these Impact Statements when used for introducing new Statutory Instruments.

It is accepted that action was taken to revise noise parameters for Inland Wind Turbines to lessen the impact. For rural areas, attention is necessary for many more because of the background noise levels are lower.

All of this points to an insufficient rural voice addressing these matters. Too little attention has been given to the impact upon rural areas or the inability to create feedback channels over real difficulties arising.

Relevance of Noise Assessments relying upon A Weighting methodology to rural areas.

I have already referred to the Noise Planning Guidelines and reliance by local decision makers upon standard practices for noise assessment methodology and measurement and those relating to the certification of Sound Reduction materials. These contain inherent weaknesses particularly with past custom and practice continuing unchanged

There is evidence suggesting that the A weighting methodology is misleading insofar as it underplays the effect of low sound frequencies (that remain audible for long distances) and
avoids attention being given to materials required for sound reduction for these frequencies below 50Hz, resulting in a rumbling noise audible to human hearing. It encourages the assessment to be based upon a single weighted average noise figure rather than a range experienced by different humans. For example reports about Air Source Heat Pumps are imply risks from strong sound pressure waves felt by some humans and the prospect of Helmholtz Resonance effects felt within neighbouring properties. It is most worrying.

Recap

1) I make no apology for submitting evidence about soundscape of rural areas. It is really an integral part of the natural environment and rural communities. It has been treated on a subject basis, rather than as an organisational mater.

2) Many of the national regulatory provisions for noise have arisen as a result of being devised for urban settings yet applied to countryside areas. Past policies have accepted significant jumps in noise levels deemed acceptable as part of new development despite much lower background noise levels.

3) Many noise sources come from mobile activity and treated as intermittent. My response principally covers permanently fixed equipment making it easier to regulate.

4) It is true that Local Government Local Plans can address noise affecting amenity for new development where these might differ from regulations coming from Central Government. However this response briefly highlights present deficiencies and many Local Plans are failing have specific noise policies different from UK national law. There would appear to be too much of a postcode lottery here.

5) It is generally accepted that significant differences exist between background noise levels of urban and rural soundscapes but little differentiation takes place unless at the discretion of local decisionmakers and often lacks adequate justification.

6) Noise concerns in rural areas are somewhat unreported and deserve more attention. The cumulative effect can alter the soundscape character of the rural area.
7) Acoustics is a complex science only briefly been touched upon here. Whilst people can generally express their judgement about noise nuisance or annoyance, the public remain poorly informed about why decisions are taken and only limited technical information is given pro to the public.

8) Decision makers are wary of noise concerns because it is treated as an obstacle to economic prosperity.

8) The UK geographic landscape is still predominantly rural (70-80% of land area) albeit with 65% of the population living in the urban areas. The soundscapes of our rural areas complement our environmental capital.

Conclusion

Changes to our contemporary building and business practices continue to occur. Too little attention is being given to the rural soundscape at the present time. Acoustics is a highly technical subject. It is timely for the Government and public to pay more attention to changes to our rural soundscapes both now and in the future. Further evidence can be supplied to inform the Select Committee if requested.

Mr R J Kirkham

11 September 2017