

## **Appendix 2**

### **City of London Noise Strategy 2016 – 2026: analysis of feedback to stakeholder consultation**

#### **Introduction**

What should the City of London sound like? The draft City of London Noise Strategy 2016 to 2026 outlines the strategic direction for noise policy in the City. It sets out the steps the City will take and has taken, to maintain or improve the City's noise environment.

The draft Noise Strategy was made available online for stakeholder comment during a 3 month period that ended on 17<sup>th</sup> October 2016. The consultation draft version can still be downloaded from [here](#). In addition the draft Noise Strategy was presented to various stakeholder organisations including CHARN (City Hotel and Retail Network), LANAF (Local Authority Noise Action Forum), the city's Licensed premises, the Barbican Association and to a wide and varied audience at the Symposium on Silence. The draft Noise Strategy was presented to this committee on 19<sup>th</sup> July 2016.

#### **Number of consultation responses received**

A total of 38 written submissions, plus a large number of informal comments, have been received in response to the consultation. These submissions can be broken down into four main categories as follows:

- Residents and residents groups: 10 (26%)
- Church groups and bell ringers: 16 (42%)
- City of London departments & partner organisations: 11 (29%)
- National noise organisations: 1 (3%)

It is important to note that the responses from residents included two co-ordinated responses by local residents associations (Barbican Association, Gilbert House Group) on behalf of their members. Also it is worth noting that many respondents in all three main categories declared themselves to be both residents and workers in the City. The Noise Strategy contains proposals that are aimed at residents, businesses, workers and visitors and it is only the latter category that appears to be poorly represented in the responses received. However, in this regard, useful feedback was received from the Head of Culture and Visitor Development on behalf of both business and leisure visitors.

#### **Positive overall response received**

It is pleasing to report that the overall response to the consultation draft of the Noise Strategy has been very positive with the vast majority of comments supportive of both the overall direction of travel and much of the detail. In general terms the level of support as a proportion of all comments received is as follows:

- Residents and residents groups: 80% supportive
- Church groups and bell ringers: 100% supportive

- City of London departments & partner organisations: 100% supportive
- National noise organisations: 100% supportive

The response from the one national noise organisation (Noise Abatement Society) to the proposed approach to “soundscape” was particularly encouraging. The draft Noise Strategy was a winner of the John Connell Soundscape Award 2016 which recognises significant advances in the practical application of Soundscape principles in line with the International Standard BS ISO 12913-1:2014. At the Awards ceremony at the House of Commons in November 2016, Lisa Lavia, Managing Director of NAS, said: “NAS congratulates The City of London Corporation for its multi-agency, innovative and bold approach to protect and enhance the aural environment through its soundscape management approach”.



*Figure 1 - Presentation of the John Connell Award 2016 at House of Commons ceremony (photo courtesy Noise Abatement Society)*

## **Further analysis of feedback received**

This discussion must be read in the wider context that the majority of comments were generally supportive, or very supportive, of the draft Noise Strategy. Indeed, where critical feedback has been received it is usually that the draft Strategy does not appear to go far enough on a particular issue, with the main underlying message being a call for further action and for additional resources to be dedicated to delivering improvements, rather than a comment that the current proposals are inherently wrong.

The following broad themes have emerged from an analysis of the feedback received, these being issues that have been raised in several responses:

- Requests to give increased priority and resources to the management of noise and sound, particularly from residents
- Requests for specific inclusion of noise sources that are not otherwise explicitly mentioned in draft Strategy, i.e. helicopters, motor-bikes, vehicle reversing alarms, amplified tour

guides, people and music on outdoor terraces on office buildings, noise from demonstrations and marches

- Requests for specific additional measures on known problems, i.e. people drinking outside pubs and clubs -particularly late in evening, delivery vehicles, construction and demolition work
- Requests from residents for more enforcement of existing noise control powers
- Requests for more initiatives to protect and promote wanted sounds of the City, in particular church and cathedral bells (also mentioned: clock chimes, brass bands, unamplified live music, birds and wildlife, horse parades)
- Requests for clearer proposals to protect special outdoor public spaces, in particular relatively quiet and tranquil places

In addition, various specific proposals and requests and suggestions were made by the Barbican Association and Gilbert House Group on behalf of their residents. Many of the matters raised are probably best dealt with as specific local issues through existing or new resolution mechanisms. Some of the matters raised could, however, bring wider benefits both to residents and other stakeholders, and these are listed below:

- Suggestion for a “resident quiet time”, say between 0700 – 1100 Saturday mornings, perhaps applied to all sites within e.g. 100m of residential premises.
- Suggestion for greater use of bespoke policies in certain areas of the City, so as to better respond to local issues
- Suggestion that there is a need for more formalised contractor – resident liaison process for major construction/demolition projects, both at the outset and during ongoing works
- Proposal that a central unit should be established to receive and co-ordinate the response to all noise complaints in the City (note – this was also suggested in one internal response)
- Suggestion for a review of how new buildings and urban form (e.g. tall glass fronted buildings, hard landscaping measures) may be affecting the acoustic environment (note – this was also raised by Noise Abatement Society)
- Suggestion that current approach to noise from new and existing extract ventilation plant and equipment may not be achieving desired outcome
- Support for increased training opportunities to be provided for those officers who will be implementing the Noise Strategy

The relatively large number of responses received from Church groups and bell ringers are notable in their unanimous support for the promotion of church and cathedral bells (and chiming clocks) as an iconic sound of the City. This is the strongest level of support received for any single measure in the Strategy. The detailed responses contain a mixture of statements of strong support for existing proposals in the Strategy, useful supporting information on the City Churches and their bells and bell ringing, as well as some specific proposals and issues that relate to particular churches. Several of the matters raised may bring wider benefits in terms of community, tourism and cultural heritage, and these are listed here:

- Current proposal to treat church bells as an iconic City sound may require a review of existing approach to noise complaints, there is a suggestion that the right balance is not always achieved when complaints are received

- Suggestion that churches should be treated as “noise sensitive buildings” for planning purposes (issues raised include noise from new outdoor office terraces being located near churches, potential for sleep disturbance when new hotel bedrooms are created very near existing church towers with historic bells, churches and church services not being properly identified as vulnerable to construction/demolition noise and road traffic noise)
- Suggestion that “bell peal performances” should be better explained, co-ordinated and advertised more widely
- Possible opportunity to work with Whitechapel Bell Foundry (Subsequent to the consultation the Whitechapel Bell Foundry announced that by May 2017 it will cease its activities at the Whitechapel Road site).
- Several respondents in the Church groups and bell ringers category have volunteered to work more closely with City officers to address issues raised

The feedback received from colleagues in other Departments and from the Noise Abatement Society is very supportive and mostly consists of specific suggestions for editorial improvements and updates to the existing text and do not seek to change the fundamental approach or policy intent. There is widespread support from other departments to the proposals to take a more positive approach to sound, and various opportunities are identified where officers should be able to work more closely together to improve the City’s overall approach to noise pollution.

There are a few comments from internal colleagues that raise issues of wider importance, such as:

- There is a particular need for improved liaison between departments on certain emerging noise issues e.g. the night economy, any new Night Tsar policies, Freight Strategy, street works, Night-Tube, City procurement policies ...
- There are new opportunities for liaison between departments on the proposed soundscape initiatives, in particular strong support from Culture, Heritage and Libraries who have suggested they could perhaps have a greater role.
- Need to check for latest resident/worker/visitor population projections and consider implications for noise management.
- A possible opportunity to collaborate with the City Housing department on a trial of “Noise App” that may make it simpler for residents to produce supporting evidence for some types of noise complaints, hence assisting officer investigations.
- Need for greater acknowledgement of the role played by DBE in the provision of the out of hour’s noise complaint service.
- Interest from other departments (DBE, PHES, P&T, Housing ...) in the likely content of the proposed Supplementary Planning Document on environmental issues and offer to collaborate.
- A recognition that the conflicting needs and lifestyles of residents, workers and visitors may sometimes come to a head as “noise complaints” but that these are often symptomatic of underlying challenges that are also being addressed by other departments and policies - need to work together and try to better “join up” relevant City policies.

## **Proposed response to feedback received**

The Noise Strategy has been edited and updated in response to the issues raised. The key proposed changes are listed in Appendix A.

Officers will provide a separate independent response to the matters raised by the two residents groups (Barbican Association and Gilbert House Group) as several of the issues raised require a more focussed local investigation and response.

It is recommended that officers should acknowledge the support from, and establish a mechanism for closer working with, the Church groups and bell ringers in order to explore the local and City wide matters raised during this consultation. It is recommended that an initial meeting including both pollution and planning teams should be established to explore the full breadth of issues raised. It may be worth examining the creation of a multi-disciplinary working group to ensure that any momentum is not lost.

It is acknowledged that the number of responses to the consultation exercise has been fairly limited and, for this reason, it is recommended that the proposal (already contained in the draft Noise Strategy) to undertake a survey that will ask residents, workers and visitors for their views and opinions on the acoustic environment of the city (including both noise pollution and soundscape), should now be taken forward as a priority to help establish a robust evidence base for further action.

## **Appendix A – List of proposed changes to consultation draft**

### **Foreword**

Minor edits to clarify terminology – sound, noise, acoustic environment etc.

Minor edits to respond to internal comments about “achieving the right balance” and for more mention of visitors as an important stakeholder.

### **Executive Summary & Ten Key Aims**

No significant changes

### **Section 1. Background (Evidence Base)**

1.1 Minor edit to highlight other noise sensitive locations (hotels, churches, libraries) that will be considered for inclusion in any future City wide noise measurement surveys. Minor edit to mention that views of business and leisure visitors were not specifically sought in previous City wide noise opinion surveys.

1.1 Proposed that Fig 3 should be redrawn as a column chart and with columns re-arranged to show decreasing numbers of complaints by source

1.1 Sentence added to highlight that complaints data can be a misleading indicator of public concern and that attitude surveys are also useful.

1.2 Sentence added to highlight that noise is included as a priority in City's Joint Health and Well-being Strategy.

1.2 Added additional emphasis to the need for the various identified bodies to work together to deliver the aims of the Strategy

1.3 & 1.4 - Clarified that perceptual aspects (sounds both liked and disliked) will be included when gathering evidence in support of future initiatives

1.4 New Action (11) "To consider supporting any innovative research proposals that investigate the overall personal noise exposure of City residents and workers across a range of lifestyle types." (Suggestion from Noise Abatement Society).

## **Section 2. New Developments**

2.2 Review and confirmation of City population and projection figures

2.2 Minor edits to add churches, schools, libraries to list of noise sensitive locations, and mention increased visitor numbers to North of the City.

2.2 Sentence added: "The arrival of new hotels, being both a source of noise and being sensitive to night time noise, is also likely to present new challenges for noise management in some areas."

2.3.4 Sentence added: "The waste collection service currently operates 24/7 and is managed to minimise the risk of noise nuisance wherever practicable."

Proposed slightly revised POLICY 2.4.1 (g) "Resist the introduction of noise generating activities such as leisure or entertainment venues into areas with strong residential character. Where this is not compatible with wider planning or other economic and social objectives for the area, to limit noise impacts by ensuring good acoustic design and by placing appropriate conditions including constraints on activities and limits on hours of operation."

Proposed revised POLICY 2.4.2 (a) "Resist the introduction of leisure or entertainment premises into areas where there is a strong likelihood that noise will result in public and / or statutory nuisance or a significant adverse impact. Where the development forms part of agreed wider or longer term planning objectives for the area, seek to mitigate and minimise noise impacts by promoting the City of London Statement of Licensing Policy to ensure noise from licensable activities is adequately managed e.g. use of sound insulation, good acoustic design, operational management measures and limits on hours of operation."

Proposed slightly revised POLICY 2.4.4 (6) to specifically include working with the retail sector

2.5 Slightly altered action 8 to include Guildhall Yard Public Programme in the list for ad-hoc advice

2.5 New action (10) "Seek to assess the risk of any unusual sonic effects on the acoustic environment that may result from the use of innovative urban design in the City, such as excessive reflections

from tall glass buildings, unusual reflections from curved buildings and overhangs, and a lack of acoustic absorption in hard external areas”.

### **Section 3. Transport and Street Works**

3.2 Altered approx. week day commuter number to 360,000

3.3 Added an acknowledgement that road traffic noise can affect “other noise sensitive premises”

3.3.2 Added reference to noise implications of “night tube” and increased helicopter numbers.

3.5 New action 9(f) “Consider reviewing the impact of traffic noise impacts on “other noise sensitive premises” in addition to the impact on residential premises”.

3.5 New action (17) “Investigate and seek solutions to the noise implications of a reported increase in the number of helicopter flights over the City, in conjunction with the GLA, neighbouring LAs and other stakeholders”.

### **Section 4. Dealing with Noise Complaints and Incidents**

4.2 & 4.3.1 Added references to the out of hour’s complaint handling service being provided in conjunction with DBE.”

4.4 Action (4) Added reference to working with City Police and Community Safety Team

4.4 New action (15) “Investigate possibility of providing a “one-stop shop” to receive and co-ordinate the response to all noise complaints in the City” (as suggested by residents and an internal comment)

4.4 New action (16) “Review current approach to handling complaints about church bells, recognising bells as an iconic City sound and striking an agreed balance between the requirements of the church community, bell ringers, residents, workers and visitors (including those staying in hotels) (see also related proposals in Section 5)”.

4.4 New action (17) “To undertake a review of our approach to noise from vehicle safety alarms including: (a) Review our current approach to the use of vehicle alarms on construction and demolition sites in the City. (b) Work with internal departments and procurement team to phase in the use of less annoying alarms on City vehicles (e.g. refuse collection, street cleaning etc.). (c) Work with TfL, GLA, other London Boroughs and Noise Abatement Society to encourage greater uptake of less annoying alarms across London”.

4.4 New action (18) “To undertake a review of our current approach to managing noise issues that may affect residents in a particular area, including the use of bespoke policies and improved liaison with residents associations and similar groups”.

### **Section 5. Protecting and Enhancing the Acoustic Environment & Soundscape**

Additional reading references added in several places (as soundscape management is a relatively new concept)

5.5 Added sentence to indicate a preference for the soundscape management procedure and that other approaches may be considered: “Whilst this soundscape management procedure represents our preferred methodology we will consider other approaches and will work with stakeholders to keep abreast of developments in this newly emerging field [ref 16].”

5.6 Added new paragraph mentioning “plants for sound” and “City Trees”: “There are a number of plants that may help enhance the perception of the acoustic environment in the City’s open spaces. Dense evergreens can shield noise sources, attract wildlife and introduce associated natural sounds, and may even have some impact on noise reduction – for example: Holm Oak, Laurel and Holly. Grasses and bamboos can provide visual screening and movement, as well as rustling sounds in the breeze that may mask other unwanted noises - suggestions include *Miscanthus* sp., *Bamboo* sp., *Arundo donax* and *Miscanthus floridulus*. There are also potential new urban landscaping developments that may also bring acoustic (and air quality) benefits, such as the “City Tree” installations that have recently been trialled in hard landscaped urban open spaces in Paris, Oslo and Dresden.”

5.8 Small edit to replace “promoting tourism” with “attracting visitors”

5.9 Added a preference to reduce unwanted sounds, rather than to try and mask them.

5.9 Added references to live music events in Guildhall Yard and GIGS:Big Busk at St Pauls.

5.10 Added additional words of caution re. careful use of added sounds so as to avoid annoyance.

5.11 Additional description of “Organ of Corti” sound art installation, including that it was not as effective as hoped and added comment that “we are keen to work with others to support sound art installations in appropriate City locations.”

5.12 Removed references to the City Corporation licencing soundwalks and developing phone apps. Now says that the Corporation could support others to develop such initiatives.

5.14 Action (1) Added reference to Cultural Strategy

5.14 Action (4) Added specific reference to the benefits of soundscape enhancement to “residents, workers and visitors”

5.14 New action (11) “We will support the promotion of church bells as an iconic sound of the City and will establish a multi-disciplinary working group to explore wider acoustic issues relating to our City churches”.

## **Appendix 1 – Review of previous actions**

Added reference to ongoing integration of noise management issues in city procurement procedures

## **References**

Additional soundscape references included