

“That this government would initiate a comprehensive review of national environmental noise legislation, including Regulation SI 140/2006 (Environmental Noise Regulations) and the Roads Act 1993, with a view to:

- **Setting statutory limit values for excessive environmental noise levels based on recommendations from the World Health Organisation for the protection of human health**
- **Identifying a regulatory assessment method for environmental noise**
- **Establishing consistency between noise mapping bodies and action planning authorities**
- **Allowing for the effect of low frequency noise**
- **Including for noise control from ports**
- **Setting out a methodology for identifying “quiet areas” as required by Directive 2002/49/EC (Environmental Noise Directive)”**

Environmental noise is noise that comes from all sources except that from the industrial workplace. So it includes road, rail and air traffic, industrial sites, construction and some other outdoor activities.

Noise is a really complicated issue. It is complicated because it is always there. It is complicated too much noise is pollution but the level of noise and the type of noise that is tolerable is a subjective thing. To make it even more complicated, it is measured in many different ways and always on a logarithmic scale.

Noise is very much the Cinderella of pollution. We talk about air pollution, pollution by litter, water pollution and much more. But how often do we talk about noise pollution? Yet it is one of the most frequent sources of environmental complaint. What we do know about noise is that according to the WHO, it is the second largest environmental cause of health problems. There is a confirmed causal relationship between chronic environmental noise and a wide variety of adverse health effects including sleep disturbance, annoyance, cardiovascular disease, endocrine effects, increase incidence of diabetes, performance and learning, mental health and stress.

Noise pollution in Ireland is managed under ten different pieces of legislation, all which do slightly different things. But despite this, we have no legal ambient noise limits. The WHO is absolutely clear that to protect the public, an average night-time exposure to noise should not exceed 40 dB(A). To avoid excessive annoyance to the public, it recommends day time noise levels should be no higher than 55 dB(A). Yet many Irish people are consistently exposed to noise levels much higher than this. In the absence of legal limits, TII produced a set of guidelines with a noise limit value target in the design of new national roads in Ireland of 60 dB Lden. But this is not a mandatory requirement, it applies to national roads only and missing the target is excused if it is not “sustainable”. In this context, sustainable often means if it is too difficult or too expensive.

Our Environmental Noise Regulations require relevant authorities to produce Noise Maps and Noise Action Plans every five years. The purpose of these is to identify and reduce exposure of the population to noise. The EPA has produced guidelines recommending intervention when ambient noise is higher than 70 dB(A) – much higher than the World Health Organisation recommendation. Moreover, in Ireland, noise mapping authorities are often different from noise action authorities. So on a national road, TII will produce the noise map, it will show where any public living alongside is dangerously exposed to noise and then the local authority is obliged to identify how to deal with that and fund it.

All that legislation governing noise doesn’t capture wind farms from which the low frequency noise can drive people from their homes. It doesn’t govern noise from ports although shipping-related activities can keep nearby communities awake for long periods of the night. And critically, because

we have no noise limits, we are not merely excusing noise levels above those known to cause health problems, we are designing for noise levels above those known to cause health problems.

Europe has recommended that we designate “quiet areas”. These are special places, often in urban areas, which are precious to people and provide time out in a busy world. The aim of designating them is to protect them from excessive levels of noise. The only place in Ireland where quiet areas have been designated are in Dublin. The current Noise Action Plan for Cork commits to identifying quiet areas during the lifetime of the plan but the plan expires this year and those quiet areas haven’t been identified yet. Research has been done to identify how best to identify areas that should be designated as quiet but that research hasn’t been incorporated into national legislation.

Last year it was estimated that 250,000 people throughout Ireland were living with a level of environmental noise that was causing them annoyance. 100,000 people were living with a level of environmental noise that was causing them sleep disturbance. For the vast majority of these people, that noise was caused by road traffic.

Studies done by the European Commission have shown that measures to directly address noise pollution have a high initial cost and it takes a long time to recover the financial investment. But if a monetary value is put on the resulting societal benefit, those studies have also shown that that investment is highly efficient.

The legislative deficiencies I have spoken of here are merely the tip of the iceberg. We urgently need to address our environmental noise legislation so that it works, so that it provides comfort to those suffering from noise pollution and genuine protection to the health of Irish citizens.

I ask for your support.