

Appendix 1 – Belfast City Council proposed consultation response in respect on the Department for Infrastructure (DfI) Roads - Environmental Noise Directive Round 4 - draft Road Noise Action Plan 2023-2028.

WSP
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Via email: round4rnap@wsp.com

Dear Sir

Re: Department for Infrastructure (DfI) Roads - Environmental Noise Directive Round 4 - draft Road Noise Action Plan 2023-2028.

Belfast City Council has considered the Department for Infrastructure (DfI) Roads - Environmental Noise Directive Round 4 - draft Road Noise Action Plan 2023-2028, as it applies to the Belfast City Council area, and would provide the following comments by way of consultation response.

Belfast City Council notes that the round 4 draft Road Noise Action Plan 2023-2208 has been based upon the outworkings of the fourth round of noise mapping, which in accordance with the Environmental Noise Regulations, has been produced for major roads, based upon 2021 road transport data. The Department for Infrastructure will appreciate, however, that during 2021, Northern Ireland was subject to Covid-19 movement restrictions, and that those restrictions were not finally rescinded until February 2022. Accordingly, it is unclear as to the applicability of noise modelling undertaken for road transport for a 2021 year to the entirety of the 2023-2028 five year review period.

Belfast City Council further notes that of the 10 CNMAs proposed for Northern Ireland, for round four, two are located within the Belfast City Council area; namely:

CNMA 1 - Belfast, Beersbridge Road – covering an approximate 335 m length of the Beersbridge Road, from its junction with the Avoniel Road to the Connswater Greenway / Conn's Water and encompassing 39 residential properties and premises.

CNMA 2 - Belfast, College Square East – covering an approximate 425 m length of College Square East from its junction with Wellington Place to College Avenue and from College Avenue to its junction with Divis Street, encompassing student accommodation at John Bell House, Queen's Accommodation Elms, the College Central apartment building, properties beside 103-105 Castle Street and at 12 Hamill Street, and the Morning Star House, 2-12 Divis Street.

Council noise officers have reviewed maps of the proposed CNMAs, and it appears that in respect of CNMA 1, some recent residential developments along the Beersbridge Road may

not be fully reflected within the Department's maps, and that for CNMA 2, the properties located beside 103-105 Castle Street are retail premises.

Proposed mitigation measures for **CNMA 1 - Belfast, Beersbridge Road** include: *'Introduction of targeted initiatives such as speed reduction, car-pools, cycling to work schemes and encouraging the use of public transport, including the BRT on the Albertbridge Road - so could potentially benefit from the scheme'.*

The Department for Infrastructure will appreciate that with respect to CNMA 1, the Beersbridge Road is already regularly served by Translink Metro Service 4, and that at the location of the proposed CNMA 1, the Translink Belfast Rapid Transit (BRT) G1 Glider east route, which runs from the city centre via the Albertbridge Road and Upper Newtownards Road, terminating at the Dundonald Park and Ride, is located some 600 m away. It is unclear, therefore, whether the proposed mitigation measures, that also include speed reductions and carpooling, etc. will lead to the necessary improvements in road transport related noise within the CNMA by the action plan delivery date of 2028.

Moreover, proposed mitigation measures for **CNMA 2 - Belfast, College Square East** include: *'Introduction of targeted initiatives such as car-pools, cycling to work schemes and encouraging the use of public transport. The promotion of the use of railway commuting may aid the reduction in commuter traffic into the city centre'.*

The Department for Infrastructure will appreciate that Divis Street and College Square East provide access to and from the city centre via the A12 Westlink 'off' and 'on' slips, and that College Square East and Divis Street, connecting to the Falls Road, additionally provide access to and from the city centre for residents living in the west of the city. Moreover, the Falls Road, Divis Street and College Square East also form a component of the Belfast Rapid Transit G1 Glider route that starts at McKinsty Road, close to the Belfast City Council boundary with Lisburn and Castlereagh City Council, travels through the city centre and eventually terminates in the east of the city at the Dundonald Park and Ride.

Accordingly, and mindful of the road network at, and in the vicinity of CNMA 2, it is unclear whether the proposed introduction of targeted initiatives such as car-pools, cycling to work schemes and encouraging the use of public transport will deliver the required reductions in road noise at this busy city centre location. It is acknowledged, however, that the nearby Grand Central Station and the promotion of the use of railway (and indeed bus) commuting may aid the reduction in commuter traffic into the city centre. It is considered, however, that the opportunity for further transition from road commuter traffic towards rail travel will be substantially determined by commuter needs and by those commuter catchment areas served by the Translink rail network. Moreover, the transition to a hybrid working model for many organisations, after the Covid-19 pandemic, is likely to have resulted in a reduction in the commuter traffic within Belfast City Centre.

By way of conclusion, it is considered that where residential properties within the Belfast City Council area have been determined by the Department for Infrastructure to be subject to excessive road transport related noise levels, more affirmative, measurable and site specific mitigation measures should be proposed by the Department, in contrast to the Noise Action Plan being dependent substantially upon improvements in the local noise environment associated with the introduction of what may be regarded as 'softer' and intangible modal shift type initiatives such as car pools, cycle to work schemes and encouraging the use of public

transport. As already highlighted, the proposed CNMAs and their environs are already served by Translink Belfast Metro bus services and / or the Translink Belfast Rapid Transit Glider.

Moreover, it is unclear which organisations would be responsible for the introduction and operation of specific measures such as carpools and cycle to work schemes within each of the CNMAs and how their implementation and impact could be monitored and confirmed by the Department for Infrastructure in order to ensure that road transport noise levels within the CNMAs are reduced to 'acceptable' levels by 2028.

However, Belfast City Council welcomes the Department for Infrastructure's comments that when addressing specific CNMAs, validation exercises can be undertaken including, for example, that site-specific noise monitoring can be completed when developing noise models to determine the specification of acoustic barriers or low noise road surfacing. Although acoustic barriers or low noise road surfacing are not proposed within either of the two Belfast CNMAs, the Department for Infrastructure is nevertheless recommended to undertake noise readings to validate the round 4 strategic noise mapping and to confirm the need for designation and implementation of the proposed CNMAs. The Department should additionally engage with residents and other relevant parties located within each of the CNMAs in order to agree any final necessary road noise mitigation measures.

I hope that you find Belfast City Council's consultation comments helpful in respect of the Department for Infrastructure (DfI) Roads - Environmental Noise Directive Round 4 - draft Road Noise Action Plan 2023-2028. Should you wish, however, to discuss any aspect of the consultation response in greater detail, please contact the Council's noise officers on 028 9027 0428 or via environmentalhealthservice@belfastcity.gov.uk

Yours sincerely

Siobhan Toland
Director City Services