

Appendix 1

1. Department for Infrastructure – Roads - Environmental Noise Directive Round Three - Noise Action Plan 2018-2023.

The Department for Infrastructure has requested that consultation responses be emailed to Belfastconsulting@amey.co.uk

Department for Infrastructure
Departmental Co-ordination Unit
Clarence Court
10-18 Adelaide Street
Belfast
BT2 8GB

Dear Sir

Re: Department for Infrastructure Roads, Environmental Noise Directive Round Three, Noise Action Plan 2018-2023

Belfast City Council has received and reviewed the Department for Infrastructure Roads, Environmental Noise Directive Round Three, Noise Action Plan 2018-2023 and would provide the following comments by way of response.

The Council notes that the Department's third round noise mapping has taken account of all major roads across Northern Ireland with more than 3 million vehicle passages per year and all roads within the Belfast Agglomeration. The Council further notes that whilst the legislation does not include noise limit values, the Department for Infrastructure has been recommended to identify those locations where the top 1% of the population are affected by the highest noise levels and where noise modelling determines that the LA₁₀, 18-hour indicator is at least 75dB.

As a consequence of the roads noise modelling, DfI has identified a series of Candidate Noise Management Areas (CNMAs) within the Belfast City Council boundary where modelled road noise levels (LA₁₀, 18-hour) are at least 75dB and where noise mitigation measures are proposed to be applied, subject to necessary funding. DfI has additionally prioritised the CNMA locations based around the number of properties affected. DfI has

stated that CNMA locations, where 11 or more properties are present, have been considered during round 3, adding that this approach is consistent with that applied in previous rounds of noise mapping.

Accordingly, CNMAs within the Belfast City Council boundary include at road locations such as the A12 Westlink, the M2 Motorway at Glasgow Street and at the Whitewell Road, Ballygomartin Road, the Shore Road, Beersbridge Road, Carrick Hill, Upper Dunmurry Lane, Parkgate Avenue, My Lady's Road and Broadway. It is anticipated that modelled noise levels within the CNMAs will need to be validated prior to locations being formally designated as NMAs.

For those CNMAs located around the A12 Westlink corridor and the M2 Motorway, the Council notes that many of the proposed mitigation measures, such as noise barriers and low noise surfacing, were identified during previous round of noise mapping but have not yet been implemented. These measures have therefore been carried forward into the draft third round Noise Action Plan with a revised planned delivery date of 2023. For other areas of the city, mitigation measures include the introduction of initiatives such as car pools, cycle to work schemes and a greater use of public transport. DfI has also identified that some of the CNMAs could benefit from their proximity to the new Belfast Rapid Transit. All of these softer measures that rely on a modal shift also have a reported delivery date of 2023.

Belfast City Council considers however, that where residential properties have been determined by the Department to be subject to excessive road noise levels, more affirmative mitigation measures should be considered, rather than relying upon the introduction of what might be regarded as 'softer' modal shift type initiatives such as car pools, cycle to work schemes and encouraging the use of public transport. Moreover, it is unclear who would be responsible for introducing specific measures such as car pools and cycle to work schemes for each of the CNMAs and how their implementation and impact could be monitored in order to ensure that road transport noise levels are reduced to acceptable levels by 2023.

Moreover, the Council notes that some of the mitigation measures proposed for the A12 Westlink at Little Georges Street form part of the York Street Interchange upgrade and that acoustic barriers and low noise surfacing proposed for the M2 Motorway, adjacent to the Whitewell Road, have been carried over from previous Noise Action Plans. It is considered that all of these engineering solutions will require significant financial resources to be

secured and it is therefore unclear whether these mitigation measures can be successfully delivered by 2023.

In any regard, the Council would encourage the Department for Infrastructure to directly liaise with local communities living in the vicinity of each CNMA regarding the proposed roads noise mitigation measures to be implemented, particularly where such mitigation measures are likely to comprise environmental or structural engineering.

Yours sincerely