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Consultation – summary

Noise and Soundscape Plan for Wales 2023-2028

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Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

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Introduction

The Welsh Government ran a public consultation from 26 June 2023 to 2 October 2023 on our draft Noise and Soundscape Plan for Wales 2023-2028¹. The Environmental Noise (Wales) Regulations 2006 require the Welsh Ministers to review and, if necessary, revise, their environmental noise action plans every five years. In addition, the Environment (Air Quality and Soundscapes) (Wales) Bill² will require the Welsh Ministers to prepare and publish a national strategy on soundscapes and to review and, if appropriate, modify it every five years. The new Noise and Soundscape Plan is intended to discharge both these requirements for the period from 2023 to 2028.

Fifty-six consultation responses were received, which is more than twice as many as were received five years ago for the consultation on the draft Noise and Soundscape Action Plan 2018-2023. We welcome an increase in awareness and interest in noise and soundscapes, and attribute this in part to the increased profile of this policy area due to the Environment (Air Quality and Soundscapes) (Wales) Bill.

Thirty-two responses were received from private individuals, sharing their particular experiences and perspectives on noise and soundscapes in Wales. One response was received from a Senedd Member, Hefin David MS, representing views expressed by his constituents. Two responses were received from environmental health practitioners (EHPs) in Welsh local authorities. Responses were also received from representatives of the following 21 organisations, whose work either supports or is affected in some way by government policy on noise and soundscapes:

Bureau Veritas UK Ltd
Castlemartin Range Action Group (CRAG)
Chartered Institute of Environmental Health (CIEH)
Design Commission for Wales
Dogs Trust
Goldsmiths, University of London
Microgeneration Certification Scheme (MCS) Charitable Foundation
Ministry of Defence
Mott MacDonald
National Parks Wales
Natural Resources Wales (NRW)
Nesta
Public Health Wales
RenewableUK Cymru
Royal Society of Architects in Wales (RSAW)
Royal Town Planning Institute (RTPI) Cymru
RWE Renewables UK Ltd
UK Noise Association
University College London
University of Leicester
Wales Safer Communities Network

¹ <https://www.gov.wales/noise-and-soundscape-plan-wales-2023-2028>

² <https://business.senedd.wales/mglIssueHistoryHome.aspx?lId=40984>

The clearest finding to emerge from this consultation is the wide variety of strongly and sincerely held views on this subject area. Very few of the 56 responses that we received expressed identical views on what government's noise priorities should be, while a number of them expressed diametrically opposing viewpoints, often with valid points made on either side.

In addition to the 56 written responses received, Welsh Government officials have listened to the views of a range of other stakeholders during the consultation period, including attending meetings with noise regulators (NRW and local authorities), the Wales Landscape Group, the Institute of Acoustics Welsh Branch, and the CIEH's Noise Management Conference.

During the consultation period, the Welsh Government has noted the publication of the House of Lords Science and Technology Committee's report from its inquiry into the effects of artificial light and noise on human health³. We have also borne in mind the responses received through our 2022 consultation on new planning guidance for air quality, noise and soundscape⁴, and through the consultation run this year by the Senedd's Climate Change, Environment and Infrastructure Committee on the Environment (Air Quality and Soundscapes) (Wales) Bill⁵.

The first national soundscapes strategy to be developed after that Bill becomes an Act is expected to be due in 2028 and produced by the next Welsh Government. If scientific knowledge, skills and experience relating to soundscape increase over the course of the next five years, a revised national soundscapes strategy in 2028 could be more ambitious in terms of its expectations of practitioners than the one we consulted on this year. We expect that the evidence gathered from stakeholders through the present consultation will inform not only the refinement of this year's Noise and Soundscape Plan but also the future noise and soundscape policy development of both this and the next administration, and so help shape the strategy that will be produced under the Act in 2028.

This summary document focuses on the 56 written responses submitted to the Noise and Soundscape Plan 2023-2028 consultation, highlighting in particular where they have led to changes to the content of the draft Plan ahead of its adoption. Some of the responses received went into considerable detail and expanded at length on particular issues. Although the points raised in those responses have not been reproduced in full in this summary document, they have been read in full, and will be retained as a resource for Welsh Government officials beyond the publication of this year's Plan, to help inform our further policy development on specific topics during the coming years. Where respondents have indicated that they would welcome further discussions on specific topics, Welsh Government officials may get in touch with those organisations or individuals to schedule conversations in due course.

³ <https://committees.parliament.uk/work/7256/the-effects-of-artificial-light-and-noise-on-human-health/publications>

⁴ <https://www.gov.wales/revised-planning-guidance-relation-air-quality-noise-and-soundscape>

⁵ <https://business.senedd.wales/mgConsultationDisplay.aspx?id=510>

Note on the summary of consultation responses

The responses that we received to the consultation questions conveyed a wide range of professional expertise, lived experiences, value judgements and personal preferences as to the role that national and local government should or shouldn't play in this area. Respondents also highlighted what actions they felt we should prioritise over the next five years.

Some of the responses received went into great detail, while others were very brief. In this summary document we have used extracts from responses to convey the breadth of opinion expressed on the subject of noise and soundscapes. We have endeavoured to acknowledge the amount of detail contained in the longer contributions, whilst giving due weight to the more concise responses. The points made in these extracts are illustrative rather than exhaustive.

No weight should be placed on the ordering of the respondents. Respondents 1 to 35 are those who responded via the online form, numbered in the order they responded. Respondents 36 to 56 are those who responded by e-mail or by post, filed alphabetically.

Question 1: Appropriate soundscapes

We asked what would be the characteristics of a village, town or city that had achieved “appropriate soundscapes”. Responses included people being considerate to one another and having an appropriate level of personal control, authorities keeping noise at safe levels, and being able to hear the sounds of nature.

Respondent 2: “Only natural sounds.”

Respondent 6: “A pleasant place to live where people are considerate about their neighbours.”

Respondent 8: “Appropriate regulation so that residents have the right to live without noise levels that affect their health and well-being.”

Respondent 11 (EHP 1): “It would be a space where the range of sound sources present was tolerable/acceptable and did not detract from the character of the area.”

Respondent 23: “I think the Senedd should leave well enough alone.”

Respondent 26 (Wales Safer Communities Network): “From a Community Safety perspective it would be that the soundscape allows enough sound that people feel safe and able to enjoy the environment.”

Respondent 35 (Prof John L Drever, Goldsmiths, University of London): “A culturally diverse, heterogeneous, vibrant even surprising soundscape that reflects the seasons, and allows nature to flourish. It needs to be allowed to develop naturally as society develops, but cultural traditions such as brass bands, should be classed as a special case when it comes to noise complaints.”

Respondent 37 (CIEH): “Exposure to noise at night, when people are not conscious or aware of the soundscape inside their bedrooms, is a serious concern. The focus must therefore be on reducing excessive levels of noise inside bedrooms at night in order to reduce objective impacts on sleep rather than subjective impacts of noise.”

Respondent 39 (Dogs Trust): “Somewhere with a high level of predictability and control, making a diverse and inclusive space which takes into account the needs of people and animals.”

Respondent 49 (NRW): “The characteristics of a village, town or city that had achieved “appropriate soundscapes” appropriate to place and context would include...

- new and expanding developments that are responsive in their design and layout to existing and cumulative soundscape effects on likely receptors, ensuring suitability to place and context, and where appropriate mitigating to reduce any potential effects on sensitive receptors

- places where the acoustic measures or screening deployed worked with local landscape character in their choice of materials and planting, additionally benefitting the perception of a more appropriate local soundscape through visual and aesthetic improvements
- places where the characteristics and qualities of soundscapes that contribute to local tranquillity, health, well-being and amenity are conserved and enhanced
- places where soundscapes that are important to tranquillity as a special quality of statutory designated landscapes are conserved and enhanced”

Respondent 50 (Prof Andrew Hugill, University of Leicester): “The main characteristic would be happier and more productive people. The way to evaluate the appropriateness of a soundscape is not through some measurement of sounds, but through consultation with the people who inhabit that sonic environment. Decision-making that is undertaken without the involvement of the people is not sustainable.”

Respondent 53 (RSAW): “We don’t feel that any village, town or city has definable or distinct “appropriate soundscapes”. Every village, town or city will experience different soundscapes at different times, very much depending on the individual time and place of that particular area.”

Respondent 54 (RTPI Cymru): “We must stress the importance of recognising that all places are different. No two villages, towns or cities would or should have the same characteristics in this respect. Appropriate soundscape should be considered on a place-by-place basis taking into account the qualities and characteristics of that place along with the views of wider stakeholders.”

We asked respondents to identify the main barriers and obstacles to appropriate soundscapes. Responses included insufficient awareness, poor communication between neighbours, and a resources and skills gap within public bodies.

Respondent 4: “Failure to enforce and regulate.”

Respondent 7: “People's disrespectful attitude to neighbours and neighbourhood, e.g. I'll do what I want on my own property.”

Respondent 9: “1. Barriers caused by lack of personal, social consideration. 2. Lack of rule/law knowledge. 3. Lack of rule/law enforcement. 4. Lack of social education.”

Respondent 19: “Many individuals may not be aware of the importance of soundscapes and how noise pollution can affect health and well-being. Lack of awareness can lead to apathy or resistance to noise reduction initiatives... Achieving appropriate soundscapes often requires collaboration between urban planners, architects, engineers, policymakers, and the public. A lack of communication and collaboration among these stakeholders can impede progress.”

Respondent 28: “Selfish neighbours.”

Respondent 29: “Lack of communication between noise maker and community.”

Respondent 32 (EHP 2): “The Agent of Change Principle isn’t something that is currently taken into consideration during the planning process. From our experience there is a large section of the housing stock in Wales that to today’s standards would be considered substandard. This is especially true for rental sector both rental and local authority.”

Respondent 37 (CIEH): “The main barrier is the lack of allocated funding and resources to reduce noise impacts on health and quality of life... Other barriers include competing community desires and effective engagement.”

Respondent 47 (Mott MacDonald): “The main barrier or obstacle is getting a developer on board with what might be or seem like a costly upgrade or additional constraints to overcome. A lot of developments are reactive instead of proactive when it comes to environmental disciplines (acoustics included), but they’d need to know this is an opportunity (not a constraint).”

Respondent 49 (NRW): “Existing development contexts and settlement characteristics with limited spatial scope for adapting soundscapes... Dealing with conflicting needs and expectations of stakeholders during the planning process... Potential lack of awareness of the importance of appropriate soundscapes and their contribution to well-being. This may be true for the public, private and third sectors as well as for communities in general.”

Respondent 50 (Prof Andrew Hugill): “First and foremost, a lack of awareness and understanding of people’s hearing differences. Next, a recognition of the complexity that acquiring this knowledge produces... Finally, there are the practical and technical difficulties of implementing the results of an increased awareness and understanding.”

Respondent 54 (RTPI Cymru): “We believe that the main barrier to achieving appropriate soundscapes is a lack of capacity, understanding, guidance and training.”

Respondent 56 (IEDE Acoustics Group, University College London): “Main barriers in achieving soundscape appropriateness in public spaces may be related to disproportionate representation of some stakeholders compared to others in the decision-making process... The understanding of soundscape appropriateness may vary among different cultures, contexts and social groups – what some people consider appropriate may not be the same for others.”

We asked how we should seek to overcome those barriers. Suggestions ranged from public education initiatives and professional training courses to more research and increased funding for regulators.

Respondent 1: “Better policing.”

Respondent 6: “Education – more information on how noise can affect people’s health, and the environment through air and noise pollution.”

Respondent 16: “WHY should you seek to overcome these barriers? Is it really NECESSARY?”

Respondent 19: “Encourage the development of quieter technologies and machinery... Strengthen enforcement mechanisms and penalties for violating noise regulations... Launch public awareness campaigns about the importance of appropriate soundscapes and the health effects of noise pollution. Educate communities about simple noise reduction practices they can adopt... Engage the community in decision-making processes to ensure their concerns are heard... Integrate soundscape management into urban design and planning curricula... Foster partnerships between local governments, NGOs, research institutions, and private sectors to pool expertise and resources... Advocate for architectural and urban design that considers local cultural and acoustic values, resisting homogenization.”

Respondent 26 (Wales Safer Communities Network): “Awareness for people of what is acceptable and of what they are responsible for as individuals, businesses and communities. This should also include ensuring that people are aware of their rights to notify of breaches and funding enforcement for planning and environmental enforcement.”

Respondent 32 (EHP 2): “Provide extra funding to LA to employ adequately trained officers... Consider including noise insulation ratings in home purchases (similarly to energy ratings), to both inform the purchaser on expectations and set minimum requirements for rented properties. It could help set the ball rolling for retrospective home improvements. Grants for poorly performing properties could be offered.”

Respondent 35 (Prof John L Drever): “Research, dialogue and deep understanding of a diverse community and its needs regarding the soundscape.”

Respondent 37 (CIEH): “A targeted and costed noise reduction programme should be developed to reduce the burden of noise on health and quality of life on a progressive basis.”

Respondent 38 (Design Commission for Wales): “Dense and mixed-use places require very good design to bring potentially conflicting aspects of everyday existence together and to create a better quality of life. For example, the traditional urban building pattern of enclosed blocks is a great way of accommodating density and a mix of uses in a way that creates a protected acoustic space.”

Respondent 43: “It is vital that the Welsh Government has legal power to compel a local authority to resolve noise nuisance.”

Respondent 49 (NRW): “We would welcome building capacity across planners, developers and consultants to understand and appreciate soundscape issues, the benefits of planning for appropriate soundscapes and how to integrate this into town and country and wider development planning. Building the community of practice on this new topic (to many) will be important... Educating the public about the importance of soundscapes, noise pollution, and its impact on health and well-being is essential. Workshops, campaigns, and educational materials can help raise awareness and encourage individuals to be more mindful of sound management... Address social, cultural, and economic inequities by ensuring that noise management policies and solutions benefit all members of the community, especially marginalised groups who may be disproportionately affected by noise pollution.”

Respondent 51 (Public Health Wales): “Considering soundscape in any overarching strategic planning policies and where necessary for individual or types of planning applications... Considering soundscape during any applicable Health Impact Assessments... Using EHPs’ existing expertise in the assessment of noise in context of other sounds... Taking on board local communities’ views on their sound environments, including recognising that some sensitising to sound levels may occur and that levels that are acceptable to some communities will not be for others.”

Respondent 54 (RTPI Cymru): “It is essential that any new guidance, processes, or procedures are adequately resourced in both the short and longer term, well communicated, with training and practical guidance. Working closely with academics to understand the research context on soundscape could support planning’s/decision makers’ learning and skills development in this area. The sharing of case studies would also be useful in this respect.”

Respondent 56 (IEDE Acoustics Group): “Possible ways to overcome these barriers could be (but are not limited to):

- Promote inclusive decision-making by ensuring that all relevant stakeholders have a voice in soundscape planning and policy development.
- Establish diverse advisory committees or working groups that represent different interests, including residents, businesses, transportation agencies, community organizations, and experts in acoustics and urban planning.
- ...
- Foster partnerships with academic institutions and research organizations to advance the understanding of soundscapes and noise pollution.
- Launch public awareness campaigns to inform residents and businesses about their roles in creating and maintaining a positive soundscape.”

Question 2: Applying the five ways of working

In this part of the consultation, respondents let us know what they thought it would look like if everybody followed the five ways of working in the Well-being of Future Generations (Wales) Act 2015 when carrying out activities that may affect soundscapes, and offered us a range of examples. The five ways of working are:

- looking to the long term so that we do not compromise the ability of future generations to meet their own needs;
- taking an integrated approach;
- involving a diversity of the population in the decisions affecting them;
- working with others in a collaborative way to find shared sustainable solutions;
- acting to prevent problems from occurring or getting worse.

Respondent 3: “More information and awareness of low flying jets and offering the communities affected ear protection and any other resources needed.”

Respondent 4: “My experience in general is that public bodies demonstrate none of these ways of working.”

Respondent 8: “A practical example would be in the rush to build windfarms. The current approach ignores these ways of working. The above criteria should be part of the planning process.”

Respondent 11 (EHP 1): “Setting up community noise groups that form part of engagement with the public on noise in the same way that air quality groups are integral to managing local air through air quality action plans.”

Respondent 12: “Working with communities to establish where issues occur, reducing speed limits as appropriate and policing road users.”

Respondent 15: “Do more surveys, but remember that minorities suffer, even if majorities don't mind. If you don't remember this, democracy fails.”

Respondent 16: “Who is this consultation REALLY aimed at? Public sector and charities? Certainly not the majority of the population.”

Respondent 19: “Investing in sustainable transportation infrastructure, such as electric vehicle charging networks and pedestrian-friendly pathways, to reduce long-term transportation noise... Collaborating with architects, urban planners, acousticians, and environmental experts to develop holistic solutions that consider both the built and natural environments... Ensuring that the needs and preferences of vulnerable populations, such as children, the elderly, and people with sensory sensitivities, are taken into account... Establishing partnerships between local governments, community organizations, businesses, and educational institutions to collectively address noise pollution challenges... Implementing proactive noise management plans for construction sites to minimize disturbances to nearby residents.”

Respondent 20: “Come on, it’s no wonder nothing ever gets done.”

Respondent 22: “Just a play on words, very little happens in reality.”

Respondent 24: “When planning a new-build the public should be properly consulted not faced with a definite future they cannot affect.”

Respondent 26 (Wales Safer Communities Network): “There are many examples of how this can work in practice but there are also barriers which need to be addressed. The clearest of which is the cost and impact of budget restraints and the increasing costs caused by the cost of living issues currently being seen... Collaboration and partnership working should include the reserved public bodies such as Policing, as well as those devolved... One example of this is the ongoing joint work around fireworks and anti-social behaviour which incorporates awareness raising, the use of tools and powers by the local authority and/or police and engagement with community groups and the retail sector.”

Respondent 30: “I hyn weithio mae'n rhaid i'r pwerau mawr sy'n caniatáu hedfan isel – ac yn gwerthu y gofod uwch rin pennau i wladwriaethau eraill – dderbyn bod gan drigolion yr ardaliedd yma hawl i fyw mewn heddwch ... a bod effaith yr awyrennau yn barhaus a pharhaol ar ein hiechyd.” (*“For this to work the big powers that allow low flying – and sell the space above their heads to other states – must accept that the residents of this area have a right to live in peace... and the effect of the planes continuously and permanently on our health.”*)

Respondent 32 (EHP 2): “Less disconnect between front line services and the decisions made at higher management levels such as Public Services Board. The planning process needs to be fully committed to adopt the aspirations contained within this policy.”

Respondent 35 (Prof John L Drever): “Artists know how to do this kind of work. It is slow and sensitive work. It must not be top down.”

Respondent 36 (CRAG): “Experience suggests this won’t work unless there is a fundamental shift in attitude and empathy... Local residents and business owners’ concerns are too readily dismissed, aren’t acted upon, and there is a considerable bias towards the organisation involved that supersedes everything and everyone else.”

Respondent 37 (CIEH): “Noise action planning should not be limited to the integration of noise and air quality management. It should go further and consider all factors affecting health and quality of life. For example, the Building Regulations set out minimum standards for health and safety, but they are not always properly integrated to achieve optimum outcomes. There is a concern that the new regulations on overheating are not based on the best available evidence and can lead to sub-optimal designs for new dwellings located in areas exposed to high levels of noise and poor air quality... People already exposed to excessive noise and poor air quality are

more likely to be socially deprived and suffer from a range of poor housing conditions... Holistic ways of working need to be applied across all areas of national and local government... Interventions should be designed, developed and implemented with community participation... There is also a need to move beyond policy statements and find cost-effective solutions that will protect and improve health and quality of life... We would recommend therefore that the Welsh Government sets up a multi-disciplinary task force to develop pilot projects to improve the health of communities exposed to high levels of noise and poor air quality.”

Respondent 38 (Design Commission for Wales): “Really good design involves systemic, iterative processes that lend themselves to the five ways of working. Soundscape needs to be considered as part of that process and of the placemaking approach advocated in Planning Policy Wales. This also requires a strategic and planned approach to how our villages, towns and cities grow and evolve. This needs to be led by local authorities, rather than reacting to the development industry.”

Respondent 39 (Dogs Trust): “A good example of this would be the Fireworks and Pyrotechnic Articles (Scotland) Act 2022. While there are positives in this Act, we do believe that it could be improved by making consultative processes more agile to be able to address sudden need and believe that there is a real opportunity for the UK and Welsh Governments to develop better interventions, in line with the WFGA and its ways of working, based on this learning.”

Respondent 43: “A Council / Local Authority that has a positive not defensive or obstructive approach to the problems of noise by listening to its residents and taking appropriate action... A Council / Local Authority should act to resolve a genuine problem of noise from residents and not “pass the buck” and ignore it so that it gets worse and worse.”

Respondent 46 (Ministry of Defence): “MOD supports the ways of working set out and envisions that it could work in the following way:

- educating communities about the impacts of noise (positive and negative noise)
- working with communities, planners, developers & businesses (including retail and entertainment)
- involving / encouraging engagement with/from diverse respondents
- working with developers, planners & industry to identify innovative / sustainable solutions, look to the natural environment where possible
- designing out nuisance noise, designing in ‘welcome’ noise, legal controls to manage nuisance noise, using sanctions where necessary”

Respondent 49 (NRW): “Utilising NRW’s Green Infrastructure Assessment Guide and other impact assessments (e.g. Health, Environment, Strategic Environment and Equality) and the Tranquillity and Place resource for identifying areas that are already important from a tranquillity point of view as well as areas where green infrastructure interventions could improve relative tranquillity and perceived soundscape, particularly when linked to population

density and well-being benefits; whilst ensuring local communities benefit from equitable access to green and blue spaces and positive soundscapes.”

Respondent 50 (Prof Andrew Hugill): “Considering the listening needs of autistic people, for example, in the development of public buildings, through a co-produced approach to design that offers flexibility and security in terms of future developments.”

Respondent 53 (RSAW): “We worry that these additional considerations for already over stretched planning officers will cause further delays to the processing of planning applications.”

Respondent 56 (IEDE Acoustics Group): “In practice, these five ways of working would result in a holistic, forward-thinking, and collaborative approach to soundscape management. Decision-makers would prioritize the long-term well-being of communities, consider the broader context of urban development, involve a wide range of voices, seek cooperative solutions, and take proactive steps to prevent noise-related issues. This approach would promote sustainable, harmonious soundscapes that enhance the overall quality of life for current and future generations in Wales...”

- **Example:** When planning the development of a new urban park, the public body considers the long-term benefits of creating a positive soundscape. They design the park to include features such as water fountains, bird-friendly landscaping, and open green spaces that enhance the acoustic environment for generations to come, providing a tranquil and restorative natural soundscape.
- **Example:** In the revitalization of a city center, the public body integrates soundscape considerations into the overall urban renewal project. They collaborate with urban designers and acoustic experts to incorporate elements like pedestrian-friendly streetscapes, street art, and public performances that create a vibrant and culturally rich acoustic atmosphere within the city.
- **Example:** When planning a riverside promenade, the public body conducts public consultations that involve a diverse range of stakeholders, including residents, artists, musicians, and local businesses. They seek input on how to incorporate live music performances, public art installations, and recreational areas that contribute positively to the soundscape, fostering a sense of community and cultural richness.
- **Example:** In response to requests for outdoor recreational spaces, the public body collaborates with local musicians and community members to establish a "cultural sound zone"...
- **Example:** The public body takes proactive steps to enhance the positive soundscape of a historic district by implementing noise-sensitive urban design principles. They encourage businesses to adopt soundproofing measures and establish guidelines for outdoor café spaces, ensuring that the district maintains its lively and culturally enriching acoustic environment while minimizing potential noise conflicts.”

Question 3: Aural diversity and the sound generated by human activities

We asked respondents how they think society should address in a fair and balanced way the dilemma of sound generated in the course of people's lives being experienced by other people as unwanted noise. The views expressed by respondents ranged from a desire for very strict regulation and a much quieter Wales, to people being allowed to make their own decisions without government interference. Some environmental health professionals wanted to stick to using the noise tolerance of "the average person" as a benchmark for regulation, while others wanted to see a shift to greater recognition of aural diversity and accommodation in decision-making of more noise-sensitive groups. Many respondents supported the principle of involving local communities more in decision-making, while others pointed to the lack of skills and capacity for carrying this out in practice.

Respondent 5: "You can't please all of the people all of the time. Spending too long on another Plan when there are major real problems in Wales where effort should be focussed – education, health, economy and travel infrastructure and delivery."

Respondent 6: "Awareness programmes emphasising how one person's noise can make another person's life hell. I find that in general there is so much noise around most people are inured to it and just don't notice."

Respondent 9: "Create forums and facilitate spaces where those experiencing these sounds with differing viewpoints can meet in the presence of a mediator, whether this is done online or in person."

Respondent 11 (EHP 1): "Education and awareness of the public as to when noise can become a problem rather than just not wanting it per se. In my noise enforcement the only time any education or awareness occurs is at the point when an officer is actively investigating a complaint... Every day is an opportunity to make people more noise aware and help manage their expectations better."

Respondent 15: "Well, actually, I would love a Wales that is silent (other than natural sounds. Imagine the bliss!) Also for older people background sounds become intensified, while lower sounds become unclear. There are a lot of us."

Respondent 16: "Governments are not 'fair and balanced'. Leave people alone to make their own choices and stop the relentless legislation and CONTROL."

Respondent 19: "Society should recognize that people have diverse sensitivities to sound due to factors like health conditions, sensory processing differences, cultural backgrounds, and work schedules. Public awareness campaigns can educate communities about aural diversity and promote understanding and empathy toward those who experience sounds differently... Noise regulations should be flexible and adaptable to different

contexts, taking into account the needs of both sound generators and affected individuals... Engage in open and constructive dialogue among affected parties, including sound generators, local communities, and relevant authorities. Establish platforms for mediation and conflict resolution to address disputes related to sound-related conflicts... Encourage the development of diverse sound environments within communities, allowing for a range of sonic experiences that cater to different preferences and needs... Embrace the richness of sounds that contribute to local culture and heritage while ensuring they are managed responsibly... Educate individuals about responsible sound practices and the importance of considering others' well-being. Empower communities to raise concerns, engage in discussions, and collaborate on finding solutions... Finding a fair and balanced solution requires a combination of legal frameworks, community engagement, technological innovations, and a mutual understanding of the diverse ways people experience sound. It's important to foster a culture of mutual respect, empathy, and collaboration to create communities where everyone's well-being is considered and protected.”

Respondent 21: “I am disappointed that piped music has been omitted from the Plan. Piped music is a major barrier for people with any form of hearing difficulties. Hospitals, doctors surgeries, pubs, restaurants, shops and public buildings all have piped music which is a real barrier to people who are using them.”

Respondent 23: “Tell the people who think of it as unwanted noise to get a grip same as people who move into a village and complain about chicken noises or the church bells.”

Respondent 32 (EHP 2): “The current system is based on EHPs providing an objective perspective which at present can be challenging to say the least. However it's a tried and tested process which seems to work. Statutory nuisance takes into account the impact on an average person as opposed to those who may have undue sensitivity. What is being proposed will increase ambiguity and reduce consistency. The proposal of introducing another decision making process will blur and complicate the process even more making it completely unmanageable... Spell out through guidance what is considered reasonable, the matter is so subjective there will always be people with different tolerances. However, if there is guidance to say what is reasonable, it can guide people on what is fair. Outside of this scope, guidance could raise awareness of what their neighbours might be annoyed by and possibly encourage better communication and liaison (strengthening relationships) or simply promote mutual respect through reasonable practice/acceptance.”

Respondent 35 (Prof John L Drever): “Agency must be given to those who would not normally be at the table due to their diverse hearing sensitivities.”

Respondent 36 (CRAG): “Fundamentally it returns to society having empathy, compassion and understanding for others. That one person's lived experience may not be your own. Many people are too quick to have the ‘I'm

alright Jack' attitude and dismiss out of hand that another person's lived experience is somehow invalid just because they haven't experienced it in the same way."

Respondent 37 (CIEH): "It must be recognised that some people and groups are more vulnerable to noise exposure than others. We also need to recognise that vulnerability to noise is not confined to small proportions of the community and can affect significant groups of people, for example people suffering from poor mental health. As such we need to stop basing decisions based on a notional average person and have regard to the needs of persons more vulnerable to the adverse effects of noise."

Respondent 49 (NRW): "Implement policies that allow for reasonable adjustments for individuals who are particularly sensitive to noise due to health conditions or unique circumstances. This can include measures to reduce noise during the night or near sensitive locations. Meaningful engagement with health and support services prior to change to ensure mitigations for the most vulnerable/those negatively impacted the most... Communication campaigns that encourage individuals and businesses to be more mindful of noise pollution and its effects on others can foster a culture of respect and consideration for the diverse needs of the community. This will be likely to include the need for behaviour change 'programmes'."

Respondent 55 (RWE Renewables UK Ltd): "The planning system in Wales is fit for purpose. It ensures that the right development happens in the right place at the right time, and plays a critical role in identifying what development is needed and where, what areas need to be protected or enhanced and in assessing whether proposed development is suitable. In the context of energy projects, the planning system already balances the perceived "dilemma" in a fair and balanced way."

Respondent 56 (IEDE Acoustics Group): "Implement clear zoning and land use policies that designate specific areas for different types of activities, such as residential, commercial, industrial, and recreational. This can help prevent conflicts by separating incompatible land uses... Foster open dialogue between stakeholders, including residents, businesses, and public authorities, to raise awareness about the impacts of noise on various segments of the population. Provide education and resources to help individuals and organizations understand how to reduce noise emissions and be good neighbours... Consider time-based restrictions on "noisy" activities in residential areas, which would in other cases allow for relaxation of some limits to let culturally vibrant soundscapes to emerge... Encourage urban planning and architectural design that prioritizes the creation of diverse sound environments within communities. This includes the incorporation of green spaces, cultural and recreational areas, and soundscapes that cater to various preferences."

Question 4: Noise and air quality

We asked respondents which air quality actions present the greatest opportunities to deliver benefits in terms of noise and soundscapes, and what more we should be doing (if anything) to link up noise and air quality policy. A strong majority of respondents to this question supported more joined-up action on noise and air quality, and provided a number of examples and ideas of how to take this forward.

Respondent 4: “Reduce vehicle traffic and you will reduce both air and noise pollution.”

Respondent 5: “Improve the road network to ensure smooth journeys without stopping / starting. Do not waste time and effort on vehicle idling regulations and fireworks.”

Respondent 6: “Stopping commercial food street vendors running constant generators or engines.”

Respondent 9: “Electric vehicles and associated infrastructure, particularly in rural areas.”

Respondent 10: “Improving pedestrian and cycling routes, reduce speed limits where appropriate.”

Respondent 11 (EHP 1): “The TFW vision of how we travel around should have within it the opportunity to reduce air and noise pollution from the transportation sector which is responsible for the majority of air quality issues in our towns and cities and also the most significant component of background noise... Bringing together models that serve air quality, noise, transportation and health cost predictions/deprivation data to work on the most impacted areas for this combination of variables as a priority.”

Respondent 19: “Investment in pedestrian-friendly zones, cycling lanes, and green corridors can not only improve air quality by reducing vehicular emissions but also create quieter and more pleasant urban environments... Expanding and improving public transportation systems can lead to reduced traffic congestion, lowering both air pollution and traffic-related noise... Leveraging technology for smart traffic management and congestion reduction can lead to smoother traffic flows, reducing both air pollutants and traffic noise... Engaging with communities to raise awareness about the benefits of reducing air pollution and noise can encourage public support for relevant initiatives.”

Respondent 23: “Nothing we are not a nanny state.”

Respondent 26 (Wales Safer Communities Network): “From a community safety perspective fireworks are a known nuisance, health risk and fire risk.”

Respondent 30: “20 milltir yr awr yn ddechrau da... ond dylent hefyd ymgyrchu i wahardd awyrennau sy'n hedfan yn isel dros ein cartrefi.” (“20

miles an hour is a good start... but they should also campaign to ban low flying planes over our homes.”)

Respondent 32 (EHP 2): “The newly introduced 20 mph areas may eventually bring about change where people will seek to use alternative modes of transport. Reducing the speed limits and encouraging a shift to electric vehicles or less polluting vehicles certainly appears to reduce the noise emitted... Currently only Part A environmental permits include noise conditions... Part B permits could be extended to cover noise.”

Respondent 34: “Reduce motorway speed in urban areas.”

Respondent 37 (CIEH): “The action planning process must be underpinned by cost-benefit analysis of the health benefits arising from different trends and interventions... In general terms, it can be stated that it will be a wasted opportunity to implement single issue action plans or programmes which only deal with noise or air quality. Action planning for noise and air quality should be a combined and integrated process. Noise exposure maps should be overlaid with air quality maps to identify the communities that face the greatest burden to health and quality of life in the future and who are less likely to benefit from national trends such as the benefits that might be expected with vehicle fleet renewal. Local priority and action plans should be developed for those communities least likely to benefit from national trends... The integration of noise and air quality in the plan is progressive and is commended. It makes every sense to integrate noise and air quality management. However, it is very difficult to maximise opportunities and deal with the tensions without good evidence on what works and what does not work. We would encourage the Welsh Government therefore to work with the local authorities to develop exemplar intervention projects which improve health and quality of life for those people most exposed to poor air quality and excessive noise.”

Respondent 38 (Design Commission for Wales): “The promotion of active travel and the creation of environments that reduce and slow traffic, along with the transition to electric vehicles. Far better design in infrastructure of all types – transport, energy, retail and logistics are all important. As the two issues are so interlinked, the policies should be completely integrated.”

Respondent 47 (Mott MacDonald): “Link noise maps to air quality maps – noise and AQ benefits can go hand in hand, but there are times (such as in queueing traffic) where this is not the case. In some instances, the AQ requirements would override any soundscape benefits.”

Respondent 49 (NRW): “Publication and implementation of the requirements of The Environment (Air Quality and Soundscapes) Bill. The improvement of the public transport network – i.e. South Wales metro. Active travel. 20 mph zones. 20-minute neighbourhoods.”

Respondent 50 (Prof Andrew Hugill): “What should be done is more and more integration of the two. At the moment, I suspect that people generally

understand that air pollution can seriously threaten health, but they do not necessarily think the same about sound pollution. In fact, there is considerable scepticism about people who say they find the soundscape disturbing and their motives. So, aligning the two issues in a way that gives them equal status in terms of health benefits would be a great step forwards.”

Respondent 51 (Public Health Wales): “Given that many of the interventions that reduce air pollution also affect noise, particularly those in the transport environment, it is critical to ensure that the implementation of these recognises the dual value and promotes and evaluates both aspects. It is also important to consider all interventions that are intended to be “noise” or “air quality” separately, to determine whether there are wider benefits or harms.”

Respondent 53 (RSAW): “We believe that if we can create more walkable neighbourhoods, this will reduce car traffic (thus reducing noise). We would also encourage greater utilisation of sensitive landscaping and suitable materials to ensure excessive sounds are reduced/muffled. We would also be cautious of generalising that greater air quality automatically leads to better soundscapes.”

Respondent 56 (IEDE Acoustics Group): “Linking legislation of noise (and soundscapes) and air quality, as the Welsh Government is indeed trying to do.”

Question 5: The draft Noise and Soundscape Plan 2023-2028

We asked respondents whether the draft Plan strikes the right balance for now between avoiding creating new burdens for public authorities and businesses in Wales, and driving the transition from traditional noise management practices to a more soundscape-centred approach that puts people and context at the heart of decision-making. Responses varied, with some saying they thought we had struck the right balance, others that we were going too far or too fast, and others that we weren't going far or fast enough. Some respondents highlighted that the Welsh Government's ambition for a greater uptake of participatory soundscape approaches necessitated skills and training for practitioners to make it a reality.

Respondent 11 (EHP 1): "I think there needs to be a process put in place that looks at a roadmap for how this new discipline develops and the roles of different stakeholders within it from regulators to consultants to members of the public and the third sector. From within this will arise the priority directions for the discipline."

Respondent 12: "The right balance can only be struck if Local Authorities are given the financial resources to tackle this important issue."

Respondent 19: "The Welsh Government's approach of gradually transitioning from traditional noise management practices to a more soundscape-centered approach, while considering the capacity and expertise of public authorities and businesses, reflects a thoughtful and balanced approach. Balancing the avoidance of creating new burdens with the desire to embrace soundscape-centered decision-making is important, especially considering the emerging nature of soundscape approaches and the need for capacity-building."

Respondent 20: "Some people are suffering serious effects from road and other sources of noise right now. Stop forever worrying about making everyone happy and achieving nothing and instead do something and make some people happy at least."

Respondent 22: "Yes, but get a method of communicating in all medias."

Respondent 25 (Dr Yiyang Hao, Bureau Veritas): "Noise and Soundscape Plan for Wales 2023-2028 has a greater depth and more practical guidance in soundscape implements in design and planning, compared with the version for 2018-2023... The Plan encourages soundscape as way of thinking and clearly listed when and how to use soundscape intervention/assessment. This is a big step moving from soundscape principles to soundscape practice. Education and training with both guidelines and good practice will help local authorities and practisers have a better understanding how it works."

Respondent 26 (Wales Safer Communities Network): "We agree in principle that the approach may be balanced for the current economic climate, however technologies may lead to alternative approaches that may be relevant ahead of the next plan and therefore there should be the opportunity

to monitor and use technology that will further improve the soundscapes across Wales.”

Respondent 32 (EHP 2): “No we feel whilst the draft plan has good intentions, the reality of implementing such plan will unfortunately lead to far more confusion , debate, and challenge. This will also decrease the consistency in decision making. Currently the level of knowledge and expertise for considering such complex matters would rest with Environmental Health Department of Local Authorities. However current staffing levels is insufficient to undertake the additional work this would generate.”

Respondent 35 (Prof John L Drever): “This is very exciting, Wales could be a world leader with its approach to an aurally diverse soundscape.”

Respondent 37 (CIEH): “We do not consider that the right balance is being struck... We consider that the draft plan lacks ambition and specificity. A clear and coherent action programme, with specified timeframes, is needed to reduce the burden of noise on health and quality of life... There is a concern about:

- the resource implications for implementing these approaches for many applications,
- the lack of clear criteria for decision making,
- the applicability of soundscape approaches in some areas such as neighbour noise complaints,
- the reliability of the methods.

We would welcome an opportunity to engage with the Welsh Government to discuss those aspects of soundscape approaches that are valuable and those that need to be developed further working in collaboration with local authorities.”

Respondent 47 (Mott MacDonald): “Yes, we believe there is the right balance for now with the aim to build skills and experience relating to soundscape over the next five years. We think it’s crucial to involve professional bodies and acousticians who are enthusiastic about acoustic opportunities at the forefront of decision-making to help drive the change. Plus, funding to LPA to develop local planning policy to implement soundscape. More training budget for the LPA officer to understand the policy fully and how to practically implement the policy.”

Respondent 49 (NRW): “NRW recognise the financial constraints public bodies and others are operating under in the current economic climate in addition to the capacity, expertise and skills gaps related to appropriate soundscape implementation and monitoring highlighted by WG... However, NRW would like to see a more defined approach to closing these gaps set out in this Plan, rather than the ‘wait and see’ position stated by WG (if skills and experience relating to soundscape increase). The next 5 years will not see an increase in the public or private sector capacity or skills unless there is a skills development ‘curriculum’ for appropriate soundscape skills (as defined in this Draft Plan), as is available via the Institute of Acoustics for environmental noise. We would recommend that Welsh Government use the next five years

to develop appropriate pathways, relevant to the policy and practice landscape of Wales, to provide an approved mechanism through which those charged with delivering this Plan gain the appropriate expertise and skills. This should include technical soundscape skills alongside a broader pathway to build understanding of soundscapes and their impacts/benefits across (e.g.) planners and developers. All pathways must include social and environmental science and evidence.”

Respondent 50 (Prof Andrew Hugill): “No, because this should not be a question of striking a balance between these two things. They are not in opposition. Public authorities and businesses in Wales are made up of people who all have hearing needs and differences. Making those a priority will mean that compliance will be seen as a positive thing, not an additional burden. What creates a burden is meaningless regulation. This is meaningful and will benefit everybody, not just those with medically identified hearing issues.”

Respondent 55 (RWE Renewables UK Ltd): “If a Noise and Soundscape Plan is adopted, the Welsh Government will need to prepare explicit guidance on how to assess the soundscape in Wales with reference to specific case studies, coupled with appropriate training to local authorities, developers and other stakeholders. Without explicit guidance and comprehensive training, the proposed plan will add cost and burden to the planning process without demonstrating any significant benefits over and above what is already in place.”

Question 6: The draft Noise and Soundscape Plan 2023-2028 (continued)

We asked respondents whether there are any points relating to Wales's airborne sound environment that we have missed. Various suggestions were received.

Respondent 6: "Reversing beeps on heavy machinery."

Respondent 13: "Wind turbines close to residential areas... noise/light impacts on homes/surrounding area affecting mental health."

Respondent 14: "Piped music and music + noise in restaurants."

Respondent 19: "The plan should aim to strike a balance between accommodating new sound sources and managing their potential impacts... Establish mechanisms for regularly monitoring the impacts of these emerging sound sources. This information can inform adjustments to policies and strategies over the plan's duration."

Respondent 24: "Councils etc should time the noise related maintenance to reasonable hours unless they can do the job without the noisy machines traditional to the job."

Respondent 32 (EHP 2): "Currently noise from barking dogs is our most popular category of complaints. Therefore would there be anything Welsh Government could introduce that would deal with this whilst also dealing with other issues relating to dog ownership? For example could there be a licensing or permit process for responsible dogs ownership? The Authority has also noted an increase in complaints received from people working from home as opposed to an office... Could the use and enjoyment of your property also extend to include working from there?"

Respondent 37 (CIEH): "The plan says very little about retrofitting of existing homes... A lot of public health issues are caused by poor housing conditions. This includes poor noise and air quality indoors, resulting either from the ingress of pollutants from outside or generated inside. We would urge the Welsh Government to move away from single issue retrofit strategies and develop retrofit strategies for health and sustainability for the communities that are most socially deprived and suffer the greatest health burden from poor housing conditions. Retrofitting should be included as an integral part of the plan... It is considered that there is a lack of integration between the noise plan and housing policies/programmes. There is a concern about the lack of integration between the noise plan and the Building Regulations and little to promote alignment between Building Regulations and planning guidance."

Respondent 40 (Hefin David MS): "I am concerned that there is insufficient reference to the noise pollution caused by live and recorded music at outdoor events and gatherings. Constituents of mine have brought this to my attention and therefore I would like to see more emphasis on this issue in the final Plan."

Respondent 41: “I have looked at the draft consultation document and can find no mention of one of the curses of modern society – PIPED MUSIC. It is inflicted on us in shops, shopping malls, restaurants, public toilets, and even in open streets in some places. Please include research into the detrimental effects of piped music on health, in your report.”

Respondent 47 (Mott MacDonald): “Water features to mask industrial sound in the Natural Soundscapes chapter. Early liaison with landscape architects and heritage teams (also potentially in the Natural Soundscapes chapter). Support and training on soundscape for acoustician and LPA/EHO.”

Respondent 48 (National Parks Wales): “While rural areas are referred to in general terms in the draft, protected landscapes are not given any particular prominence... The document should refer to the role of Wales’ national parks and areas of outstanding natural beauty as important curators of natural soundscapes and distinctive soundmarks. We suggest that the document should identify soundscapes as an integral part of people's experience of protected landscapes and recognise that sound / tranquillity may be a special quality of protected landscapes in its own right. Reduction of inappropriate noise often also brings attendant benefits in terms of air quality and reduced species disturbance... There is scope for identification and monitoring of soundscapes and soundmarks through protected landscape management plans and Local Development Plan annual monitoring reports.”

Respondent 49 (NRW): “Whilst this is probably implicit within other elements of this Plan, we feel that the expectation versus experience schism should be explicitly included... A Blue Flag beach on a sunny Bank Holiday in school holidays is a very different experience from a remote mountainside accessible only by those with some mountaineering skills. People’s expectations of both places will be very different – at the first the expectation is of bustle, the noise of people, maybe jet skis or boats, excited children. At the second the expectation is of solitude, quiet, the sounds of nature. Yet change one small thing in the soundscape and the experiential value of that place is changed, influencing visit decisions about that place in the future. For example, introduce a low flying drone filming the landscape to the remote mountain side and because the expectation of the soundscape did not include this the experience is, more than likely, devalued.”

Respondent 50 (Prof Andrew Hugill): “The restriction to airborne sound means that you are excluding all those people who listen through felt vibration rather than through the cochlear. This includes many Deaf people. You cannot decouple vibration from sound: the two are really one and the same. Vibration is “heard” through many media other than air.”

Respondent 51 (Public Health Wales): “Considerations of potential positive and negative impacts from intensifying or changing agriculture practices, new technologies and practices introduced to combat climate change.”

Respondent 56 (IEDE Acoustics Group): “The document is quite comprehensive. If anything, electric scooters and unmanned aerial vehicles, might have been given slightly more prominence in the current document as emerging – and potentially pervasive – sound sources.”

We also asked respondents if they disagreed with any of the items that we have outlined in the draft Plan. Responses ranged from the general to the very specific.

Respondent 5: “Don't include areas where responsibility is not devolved e.g. fireworks.”

Respondent 8: “Many opportunities to generate energy from the wind without harming our cherished protected landscape areas'. This is certainly not the case currently – the damage being caused is long term and irreversible.”

Respondent 12: “7.5 states that the environment of many MOT Test stations would prohibit sound testing. This is an excuse to avoid the issue, a booth to exclude other sound should not be difficult.”

Respondent 16: “I disagree with it all. Just stop boy racers with their souped up engines.”

Respondent 17 (John Stewart, UK Noise Association): “No, it is an outstanding plan.”

Respondent 23: “Yes leave Wales alone.”

Respondent 24: “No it all seems very well thought out.”

Respondent 25 (Dr Yiyang Hao): ““Employers sometimes... rely on personal hearing protection programmes. This is not appropriate, as the hazard, the noise source, is still present.” I don't think it is fair to assume that it is completely not appropriate. It is not possible to remove the “presence” of source of noise entirely or even largely in a lot of scenarios. Reductions can be made by better engineering or barriers etc but hearing protection is still a valid prevention method.”

Respondent 32 (EHP 2): “In section 7.5 we don't think it's appropriate for a mechanic to use a sound level meter, especially without relevant training and they already subjectively assess excessive noise for the type of vehicle, which would indicate if there is a problem or modification to investigate... Some of these illegal modifications are carried out independently by drivers and refitted in time for the MOT only to be removed again shortly after. So it is important that Police Officers are adequately trained to identify that the vehicle is not road legal from such modifications, despite holding a current MOT.”

Respondent 37 (CIEH): “We have specific comments on how the plan could be strengthened:

- **New Development:** TAN 11 should be strengthened to encourage good acoustic design as early as possible... We strongly recommend

the use of the noise criteria set out in the ProPG and the use of consistent numerical standards... It should not be the case that unsafe levels of noise should be permitted whilst addressing excess heat.

- **Decarbonising our society:** We recommend that our guidance should be used first with the MCS procedure used as a backstop. In addition, the plan should call for the MCS system to be updated as a matter of urgency. The plan should be stronger on wind turbine noise...
- **Natural soundscapes:** This aspect of the plan is progressive and should be applauded.
- **Transportation:** The plan should go further and set out a coherent plan for improving the health and quality of life for those exposed to harmful levels of noise and air quality on a prioritised basis. Targets should be set, underpinned by cost benefit analysis and the spatial study presented by the Health Security Agency. There should be committed funding for implementing action plans and interventions... Retrofitting should also be used as part of the measures used to tackle excessive noise... Social deprivation and health indices should be used to identify priority areas... We should also explore wider opportunities to tackle carbon emissions and wider determinants of poor health as well... We also recommend specific guidance on dealing with noise nuisance from railways.”

Respondent 44: “The permitted development rules on heat pumps should be tightened to ensure the public (owners & neighbours) are protected from noise nuisance and the technology is not tainted.”

Respondent 52 (RenewableUK Cymru): “The Plan should state that existing standards and processes for wind turbines are fit for purpose... We would urge consideration on whether there is a need for the Noise and Soundscape Plan to address onshore wind. Onshore wind is being singled out in the draft Plan whereas other (energy and non-energy) projects that also generate noise are not included.”

Respondent 53 (RSAW): “We encourage Welsh Government to be considerate of unintended consequences of additional rules surrounding soundscapes and noise creation. We also think it's worth highlighting the fact that this could lead to more zoning, which is running completely contrary to a lot of contemporary thinking.”

Respondent 55 (RWE Renewables UK Ltd): “It's not understood why onshore wind has been included in this soundscape consultation, whilst it is not included in the 2018-2023 version.”

Respondent 56 (IEDE Acoustics Group): “One of the key concepts presented in the document is “soundscape design”, which is defined (also in the Glossary) as “a participatory, people-focused approach...” We would suggest removing “participatory” from the definition, or adding a note stating the “whenever reasonably practicable” aspect.”

Question 7: Expert advice on soundscapes

Following a suggestion that the Welsh Government establish an expert advisory panel on soundscapes, we asked what questions ought to be considered by experts advising the Welsh Government over the next five years. Here again, a wide range of differing views were expressed, along with many helpful suggestions for further research and expert input to future government policy-making in this area.

Respondent 5: “I do not believe a Panel should be formed. Focus on issues that are real problems rather than spending time and effort on made up problems.”

Respondent 8: “The impact of wind turbine noise, including LF and infrasound generation with greater emphasis on preserving quiet spaces. Greater understanding and subsequent legislation in relation to the negative impacts.”

Respondent 11 (EHP 1): “1. Has the development process enhanced soundscapes? 2. Are people more aware of what noise they can reasonably expect and what is unreasonable? 3. Are the mechanisms for dealing with noise problems still applicable in 2028? 4. What new approaches to dealing with sound and noise management can be adopted? 5. Is the protection of certain soundscapes with unique characteristics warranted in some areas? Anti idling regulation as it affects the soundscape and children's health disproportionately. Bringing together the modelling resources that exist for noise, air quality, health outcomes and transportation for more directed action where impacts appear to be greatest.”

Respondent 17 (John Stewart): “How well is noise policy being integrated with other policies? Are local authorities delivering? If not, what are the barriers? Are we meeting the challenges of ensuring noise does not lose out to decarbonisation? Is the noise climate improving for the most noise-sensitive people? The biggest challenge could be around things like heat pumps and wind turbines, given the pressure to decarbonise.”

Respondent 19: “How can we effectively integrate soundscape considerations into urban planning and development strategies to create more harmonious and sustainable urban environments? What innovative approaches can be adopted to engage the public in the development and implementation of soundscape policies, ensuring that diverse community perspectives are considered? How can emerging technologies, such as advanced acoustic materials, smart city solutions, and noise-mitigating infrastructure, be harnessed to both improve soundscapes and manage noise pollution? What strategies can be implemented to ensure that positive sound environments are equitably distributed across different communities and socio-economic groups, addressing potential disparities in soundscape quality? What should be the core elements of a comprehensive framework that guides the long-term sustainability of soundscapes, accounting for evolving technologies, lifestyle changes, and policy advancements?”

Respondent 20: “Don’t waste money on panels. Use the money to engineer solutions to clear problems. No talking shops, we have too many and instead need action not endless talking.”

Respondent 25 (Dr Yiyang Hao): “Soundscape quality prediction should be ideally based on the participants of the local community. However, with more and more soundscape research and practice, a bigger database of soundscape assessment can be established, which can be used as references for soundscape prediction by modelling when public participation is not feasible. For instance, the project shares similar groups of people and contexts with a previous project. It is vital to publish a technical guidance to standardise the modelling techniques and procedures with supplement of ISO standards on soundscape.”

Respondent 26 (Wales Safer Communities Network): “1. How will these changes benefit individuals, businesses and/or communities? 2. Will they make individuals and communities feel safer? 3. Are there any unexpected consequences not considered?”

Respondent 30: “Hedfan isel... blaeriaeth fwyaf... mae'r effaith mae nhw'n gael ar iechyd meddwl – a chorfforol – y rhai ohonom sydd yn byw efo'r hyrddiadau cyson hyn o swm yn anioddefol.” (*“Low flying... top priority... the impact they have on the mental – and physical – health of those of us who live with these constant blasts of noise is intolerable.”*)

Respondent 32 (EHP 2): “Will the panel have some front line officers such as EHPs attending? This would allow perspective to be given from those officers working on the frontline service dealing with noise. Their input would hopefully provide some perspective on how the soundscape plan would actually work on the ground.”

Respondent 34: “How to stop motorway noise travelling long distances – the M4 is a mile way but it's very rare for us to be able to enjoy our back garden and we sometimes can hear the traffic hum indoors and with windows shut.”

Respondent 36 (CRAG): “A greater understanding that people do work from home now, especially after the pandemic, and that these workers are as important as anyone else.”

Respondent 37 (CIEH): “What method should be used to undertake the cost benefit analysis? How should the noise exposure response functions in webTAG be updated? What are the most cost-effective methods for improving health and quality of life for those communities facing the greatest burden on health and quality of life? What methods should be used for measuring changes in all aspects of health and quality of life resulting from noise interventions or proposals? What are the best ways of encouraging innovation into the noise management programmes? What methods should be used to measure and quantify the effectiveness of community participation approaches? There is an urgent need to implement pilot projects to provide

exemplars and to provide the evidence needed on cost-effective solutions that can be deployed to improve health and quality of life.”

Respondent 38 (Design Commission for Wales): “How can the planning system plan positively for appropriate soundscapes as part of a wider strategic placemaking approach for different places? How can good design be integrated fully in different environments to improve acoustic experiences for all? How can mixed-use and higher density development ensure design which optimises appropriate soundscapes? How can we reduce the dependence on the car and create places where more people walk, cycle and use public transport? How can local authorities and consultancies be supported in the move to a soundscape-centred approach?”

Respondent 39 (Dogs Trust): “How can Wales make fireworks usage safer, more considerate, and more inclusive using the existing policy levers at its disposal as well as in partnership with the UK Government and/or should relevant powers become devolved to Wales? How can we ensure that soundscapes and proposals relating to local and national initiatives give adequate consideration to animal welfare? How will the panel seek to engage and consult with people and organisations advocating on behalf of animals to ensure that they can be co-creators with regard to their soundscapes in future? ... We believe that it will be vital that any expert panel includes people and/or organisations with expertise in animal welfare and specifically on how noise and sound impacts on animals’ welfare and behaviour.”

Respondent 41: “Please include research into the detrimental effects of piped music on health.”

Respondent 47 (Mott MacDonald): “1. How should an existing soundscape be characterised by source to enable the temporal variation to be captured? 2. How should the spatial variation in soundscape be characterised given that sound level contours are probably insufficient for this? 3. How can the ‘cost’ of a change be measured so that this can be compared to the ‘benefit’ of control measures? 4. What lessons can be learned from experience elsewhere in the UK, Europe and beyond for soundscape recognition and control? 5. Besides noise reduction, what other elements of sustainability should be included in the assessment of noise control measures?”

Respondent 49 (NRW): “Advice on the development of local soundscape assessment guidance, which can also be used as a component of local tranquillity assessment. The Landscape Institute Technical Committee, the Institute of Acoustics and the Wales Landscape Group could collaborate with the panel... How can the results from a soundscape assessment be used to make a difference in practice e.g., local landscape/place, regulation/permitting, Health Impact Assessments? How can we effectively share developing policies, best practice and progress between authorities to upskill, build capacity and knowledge? How to apply cost benefit analysis to soundscape design? How will the success, or indeed failure of newly introduced soundscapes be measured and reported?”

Respondent 50 (Prof Andrew Hugill): “1. What is the extent of hearing differences between people and how do those translate into needs for the soundscape? 2. Where may appropriate soundscapes that meet these identified needs be made? 3. How do we build soundscapes that address the full range of aural diversity, and which types of hearing should be excluded from a given soundscape? 4. Why should we make appropriate soundscapes? What are the benefits? 5. What does the provision of appropriate soundscapes mean for individuals and for society? How will they change things?”

Respondent 51 (Public Health Wales): “Training for stakeholders on the concept and application of soundscape to involve stakeholders that are not just experts in noise control e.g. town and country planning services, public health, NRW. Obtaining evidence of soundscape implementation from case studies in the UK and abroad. Exploring what tweaks may be made to existing legislation and practices to enable a soundscape approach to emerge. Communicating the evidence base to improve understanding of the health harms of noise.”

Respondent 53 (RSAW): “We feel there are too many advisory panels in existence and don’t think an additional expert advisory panel on soundscapes is necessary.”

Respondent 56 (IEDE Acoustics Group): “The establishment of such an expert advisory panel on soundscape to inform Welsh Government policies would be very welcome. Top questions the panel may consider are:

- What are the examples of “soundscape predictive models” that are currently available, or under development, which could potentially be used within a soundscape design application? Is there scientific evidence to support their use?
- Are there “best practice” examples of soundscape designs in Wales? If so, should they be listed/collected in a national repository?
- Which soundscapes would qualify in Wales as having cultural meaning, and thus worth being preserved/protected under a (intangible) cultural heritage framework?
- How can we leverage emerging technologies and innovative solutions to reduce noise pollution and enhance positive soundscapes, particularly in rapidly changing urban environments?
- How can we further integrate soundscape considerations into urban planning and development to create more harmonious and sustainable cities and communities?”

Questions 8 and 9: Welsh language

A small number of respondents raised specific points on how the Welsh language might be impacted, positively or negatively, by noise and soundscape policies.

Respondent 4: “Don't see this as a language issue.”

Respondent 5: “No impact.”

Respondent 6: “I don't see how the Welsh language would be adversely affected.”

Respondent 19: “Emphasize the cultural significance of the Welsh language in the context of soundscapes. Promote the role of Welsh language in preserving and celebrating local heritage... When planning noise mitigation measures, consider the linguistic needs of the community. Avoid designs that inadvertently hinder communication in Welsh.”

Respondent 20: “This is not a Welsh language issue in any shape or form.”

Respondent 29: “Welsh speaking communities will move away from their community if the jet noise carries on.”

Respondent 30: “Dwi ddim yn credu fod y Gymraeg yn dioddef yn waeth na'r Saesneg... yr un yw'r effaith ar bawb sy'n dioddef oherwydd swm.” (*“I don't believe that the Welsh language suffers worse than English... the effect is the same on everyone who suffers because of noise.”*)

Respondent 35 (Prof John L Drever): “This can only be good. The soundscape approach celebrates culture and language.”

Respondent 39 (Dogs Trust): “Welsh language soundscapes (such as those created by Welsh-language music events or the Eisteddfod) should not be treated less favourably than English-language events. Given the peripatetic nature of the Eisteddfod, any changes to local soundscapes caused by Welsh-language events are infrequent and well-signposted. Changes to soundscapes are best managed through ensuring organisations are transparent, give notice, and are mindful of the potential impact on vulnerable groups and animals. This can co-exist with an ambition to support Welsh-language events and provide positive and meaningful opportunities to encourage the use of the Welsh-language.”

Respondent 56 (IEDE Acoustics Group): “While there are qualitative and quantitative protocols developed for soundscape data collection in the ISO/TS 12913-2:2018, these are only available in English... Welsh Government may legislate for protocols for soundscape data collection to be offered in Welsh to the members of the public, as well as potentially lobbying the British Standards Institute (BSI) to provide translated versions in Welsh of the soundscape-related BSI standards.”

Question 10: Any other comments

Here follows an illustrative selection of other comments that we received:

Respondent 8: “The Welsh Government's policy on fast tracking windfarm development in Wales has overridden the concerns of local communities, particularly in relation to turbine noise, which currently is not being properly assessed or monitored and in the light of NRW's recent 'Tranquility and Place' designations. There needs to be a comprehensive overhaul in respect to current windfarm noise impact assessment methodology, its impact on our natural green spaces and its health implications across the audible and non-audible sound spectrum.”

Respondent 9: “Motorists and in particular motor cyclists who use our country roads as racetracks. My observations and discussions with others indicate that 70% of these motorists have little or no effective silencers and revel in speed and noise. Discussion with the Police and politicians – local, Welsh and UK show they are fully aware of the problem but they all seem unwilling or unable to enforce social or legal requirements.”

Respondent 11 (EHP 1): “Requiring all local authorities to have Core Policies as part of their local development plans (LDP) that relate specifically to noise and soundscapes needs to be mandatory; if not on the horizon. There are still a lot of LDP core policies out there that are too broad in their coverage and need to focus on what is being asked of developers; and a few where there are no core policies specific to noise and soundscapes. Guidance on devising planning policies for soundscapes will be required.”

Respondent 18: “Please look at the issues that residents of Coed Camlas, New Inn, Pontypool have due to the A4042, railway line and heavy industry... in terms of the air and noise pollution they are subjected to which has increased since the site was built over 23 years ago.”

Respondent 19: “Recent developments have led to a significant increase in noise pollution, threatening our quality of life and well-being. In recent times, it has become evident that the serenity we hold dear is being challenged by a multitude of factors. The felling of trees along the dual carriageway, the consequent rise in traffic noise due to congestion and pollution caused by traffic lights, the disruptive clamor of motorbikes during the weekends, the sounds emanating from the new train station... the emergence of more ambulances and the construction of 900 new homes... Sleep disturbances, heightened stress levels, and reduced overall quality of life are just a few of the negative impacts that we are currently enduring. Our children's ability to concentrate and learn is being compromised, and the natural beauty of our surroundings is being overshadowed by the ever-present noise.”

Respondent 25 (Dr Yiyang Hao): “Studies show electric cars are quieter than fuel cars when speed is low, however, their noise levels are similar when speed is high because sound of rolling tyres driving on pavement is predominant at high vehicle speed. The sound increases with higher vehicle

speeds. Therefore, speed limit control is still essential for car traffic noise control during age of electric cars.”

Respondent 27 (Nesta): “Homeowners are often put off heat pumps by the cost, delay and risk of planning. Planning applications can cost thousands of pounds and add months to work... The 3m rule could make it harder for Welsh homeowners to install ASHPs than their neighbours in England where the limitation is smaller, at 1m... Consider removing restrictions on the ASHP size and where they can be installed and focusing instead on making sure they do not cause this noise nuisance... It would be sensible to set sound limits based on how noisy areas already are... Encourage UK government to give MCS responsibility for managing heat pump noise. Best practice installing ASHPs in the UK will evolve over time for various reasons (e.g. experience, new technologies, improved understanding of soundscapes)... It takes longer to update planning laws than the MCS rules. Therefore it would make sense to continuously update MCS rules based on best practice in noise nuisance prevention and allow ASHPs to be installed under permitted development as long as they comply with MCS.”

Respondent 31: “Reducing traffic speeds and improving surfaces on ****bridges**** to reduce noise would help reach a number of goals including soundscape, air quality, active travel. It is important for two reasons: to encourage cyclists and pedestrians to use them more – bridges are often critical links in active travel – and also to reduce noise to surrounding homes and public areas, which carries far especially when bridges are over water.”

Respondent 33: “To protect Wales' tranquil areas, & the well being of the rural population who would be forced to live near them, all onshore wind turbines/farms should be stopped.”

Respondent 34: “Please address motorway noise – it gives us long-term stress and we cannot relax in our garden.”

Respondent 35 (Prof John L Drever): “The questions are great, it would be easier to develop the discussion with a symposium in Wales with soundscape experts and Welsh language speakers, again, not only engineers.”

Respondent 36 (CRAG): “Castlemartin operates to a daily decibel level at the boundary of 140 decibels and never to a limit of 130 decibels. CRAG have repeatedly asked for parity with our English counterparts, where the MOD self-impose a 130 decibel limit at the boundary, such as at Salisbury Plain or Otterburn. CRAG have also repeatedly asked for an explanation as to why Castlemartin operates at a daily 140 decibel level when other English ranges set a 130 decibel limit and they have consistently failed to give a coherent response... CRAG have asked for mitigations to be put in place such as acoustic barriers, bunds, trees to be planted and more robust GNAT monitoring... We have asked that a noise and vibration study such as those conducted at Pendine and Shoeburyness is undertaken to fully assess the impact the firing has on both lives and properties.”

Respondent 42: “Have someone to oversee the Council’s enforcement employees who is non-judgemental, listening to both sides to make a decision... Allow the Ombudsman to be non-judgemental and listen to both sides, looking at the evidence... I would recommend that any Councillor should be able to represent a Community member, again to ensure that justice is carried out, not allowing Council employees and Councillors to abuse their power by making their own choices... Something needs to be done to prevent the Council employees from using their own judgement over carrying out the correct procedures.”

Respondent 43: “We look forward to this policy about noise becoming statutory with enforceable power to require that Local Authorities / Councils have a duty to act objectively and engage with the people such as ourselves as residents in the community to reduce noise pollution which adversely affects our lives and damages our health and well-being.”

Respondent 45 (MCS Charitable Foundation): “MCS Foundation welcomes the efforts the Welsh Government are making to ensure that Wales benefits in the long term from a noise and soundscape that takes into account the needs, as far as practicable, all of its residents. We also welcome the efforts made by the Welsh Government in achieving net zero... There is a clear and obvious need to focus on the rollout of technologies that are available now, and revising the permitted development rights around heat pump deployment will be a vital element in accelerating their uptake. As part of that process, we would strongly encourage all the devolved nations to align with noise requirements to create a consistent planning and regulation landscape. We would also encourage a focus on noise levels rather than distance to property boundaries when reassessing the regulations. Both the Welsh and UK Governments have recently undertaken work to reassess air source heat pump related noise with a view to relaxing permitted development rights. This work has included consulting with MCS throughout the process, with a view to refining the calculation methodology relating to sound within MCS 020. We welcome the opportunity to continue our involvement in the process of re-evaluating permitted development rights to support the heat pump rollout, and are committed to supporting the Welsh Government in doing so.”

Respondent 49 (NRW): “We welcome that inclusion of the Tranquillity & Place resource to inform the writing of the next State of Natural Resources Report to be prepared by NRW under the Environment (Wales) Act 2016 as a Welsh Government evidence priority for the next five years... We would welcome the development of guidance particularly for use in the environmental permitting and regulation regime.”

Respondent 50 (Prof Andrew Hugill): “Case law often relies on a notion of “the man on the Clapham omnibus” as a hypothetical representative of a typical person. This is surely due for a rethink, since the typical person is likely to have significantly different hearing to the “normal” standard. (We may also observe that the gendered and London-centric nature of this cliché also demands a rewrite).”

Welsh Government response to the consultation

The word “soundscape” has appeared in Welsh Government policy since 2011 when we asked local authority officers nominating urban green spaces as candidate “quiet areas” to “describe in words the typical aural experience of a member of the public visiting the space” and answer questions such as:

- What are the dominant man-made sounds (in particular from transport or industrial activities)?
- What positive sounds (e.g. birdsong, rustling leaves, flowing water, the welcome sound of fellow human beings) are characteristic of the place?
- Do unwanted sounds mask or detract from natural sounds or other positive sounds within the area in question?
- Have noise complaints been received from visitors?

In the decade that followed, the meaning of the word “soundscape”⁶ has been formalised through international and British standards. The Welsh Government endorsed the standard definition of soundscape in 2018, both in Planning Policy Wales (PPW) and in our Noise and Soundscape Action Plan (NSAP), and named “appropriate soundscapes”, meaning the right sound environment in the right time and place, as one of Wales’s National Sustainable Placemaking Outcomes.

In 2015, the Well-being of Future Generations (Wales) Act established that taking a decision “in accordance with the sustainable development principle” required the involvement of people who “reflect the diversity of the population”. The 2018 NSAP set out a list of “dos and don’ts” to help public bodies apply the Act’s five ways of working to noise and soundscape management, and we have refined those “dos and don’ts” in the draft Noise and Soundscape Plan 2023-2028.

In the Ministerial Foreword of the NSAP, the then Minister for Environment wrote:

“The towns and cities, in which most of us live, serve us in a variety of ways, and should therefore contain a variety of soundscapes appropriate to the land use. There should not be a one-size-fits-all urban soundscape, which we experience wherever we go, any more than every street and building should look alike.”

The five years since we published the NSAP have seen an increased awareness of neurodiversity in society generally, and of aural diversity in the field of noise and soundscape management. This has strengthened the case for involving a diversity of the population in decision-making, as was already required by the 2015 Act, and for delivering a variety of soundscapes, as called for in the 2018 NSAP.

The draft Noise and Soundscape Plan 2023-2028 therefore does not present a change in Welsh Government noise policy, but rather a confirmation and cementing of principles that we have already set out in both policy and legislation. The Environment (Air Quality and Soundscapes) (Wales) Bill will put the 2023 Plan on a stronger legal footing than previously, as our national strategy on soundscapes, and

⁶ Defined as the acoustic environment as perceived or experienced and/or understood by a person or people, in context (ISO 12913-1:2014).

will also ensure that the Plan continues to be reviewed and refreshed at least once every five years to keep pace with emerging best practice in the field of noise and soundscape management.

The responses to the current consultation illustrate the diversity of opinion that exists in relation to sound in our society. They highlight the difficulties and complexities in achieving appropriate soundscapes that meet the needs of a diverse population, but leave us more confident than ever that this is the goal to which we should all be aspiring in this policy area.

Education and awareness-raising

Under the Environment (Air Quality and Soundscapes) (Wales) Bill, the Welsh Ministers will have a duty to promote awareness of the risks to human health and the natural environment caused by air pollution, and ways of reducing or limiting air pollution. We will add a commitment in the Noise and Soundscape Plan to also promote awareness of the impacts of noise on people and animals, and ways of reducing or limiting those impacts, as we discharge these new air quality duties.

We will do this because, when a soundscape is imposed on a community against its will, which is occasionally unavoidable, it is unlikely to be regarded by that community as an appropriate soundscape. Enforcement of noise regulations should therefore never be our starting point, but rather a last resort, to protect communities from the small minority of individuals who do not care if their actions affect other people's well-being. The enforcement of noise regulations may succeed in driving down the decibels, but it also risks worsening relationships between the noise-makers and complainants, so alternative solutions should always be pursued first. For the majority, noise should ideally be managed through dialogue and a willingness to try to understand one another and seek to accommodate different viewpoints, and so we take on board the calls for greater education in this area.

Skills and resourcing

The Welsh Government will commit to engaging with professional bodies that offer training in the field of acoustics, and work with those who are willing, over the course of the next five years, to seek to fill the gap that currently exists in training for the practical application of soundscape techniques in day-to-day public decision-making.

We want to encourage greater use of participatory soundscape techniques such as social surveys and soundwalks to inform decision-making, in order to involve people who reflect the diversity of the population affected by those decisions. Such approaches are set out in the international and British soundscape standards. However, we recognise that there is a substantial gap in the formal training and certification currently available to acoustic consultants and regulators in the UK, which focuses predominantly on more traditional noise assessment techniques. We accept that this limits the ability of consultants and regulators to implement soundscape approaches consistently at this point in time.

The Plan recommends that the methods outlined in the soundscape standards be used in a targeted manner, to deliver whatever information on people's perception of

their sound environment is considered of practical benefit to decision-makers on a case-by-case basis, and that the practical application of the approaches should be proportionate to the potential for soundscape interventions to deliver appropriate soundscapes and better overall outcomes.

The generalised decision-making framework set out in the Plan makes it clear that we do not expect soundscape techniques to be applied where the potential for better outcomes through soundscape interventions is low. Where there is medium potential for better outcomes, the framework only calls for soundscape techniques to be applied to deliver enhanced outcomes where practicable. What is practicable will be determined in large part by the progress we make over the course of the next five years in increasing skills and competence in soundscape assessment and design in the UK. In its response to the consultation, Public Health Wales calls for training on the concept and application of soundscape to involve stakeholders that are not just experts in noise control.

We accept that financial constraints in the public sector are also a barrier to the swift uptake of non-traditional approaches to noise and soundscape management, just as they limit our own ability to commit to more traditional noise mitigation interventions, both on the transport network and within existing buildings. We have heard some environmental health professionals say that they would not have the time to attend training courses even if they were readily available. Continuing professional development is vital to delivering high quality public services, so the Welsh Government will seek further clarity on this point and work with local authorities to ensure that this is not the case, and that officers are able to receive the training they require to do their day job in line with the ways of working in the Well-being of Future Generations (Wales) Act. This applies both to existing noise officers who wish to expand their skill sets into the use of social surveys and co-production with communities, and to local authority officers who are used to working with social surveys and carrying out co-production, but who wish to expand the application of these approaches to include the sound environment, and support the work of their environmental health colleagues.

Terminology

Addressing a point raised by University College London, in this Plan we will draw a distinction between “designing soundscapes”, a broad term which may include the use of models that predict how people might perceive and experience a future sound environment, and “soundscape design”, by which we refer exclusively to a participatory approach to design informed by a community’s views throughout the design process.

Scope of the Plan

Respondents suggested a range of topics to be added to or given greater attention in the Noise and Soundscape Plan 2023-2028. Some of these, such as piped music, barking dogs, outdoor music events, and designated landscapes, can and will be referenced more explicitly in the Plan. It should be noted, however, that any airborne sound sources not mentioned by name in the Plan are implicitly covered by its cross-cutting policies. These include the five ways of working / dos and don’ts, taking a

proportionate approach to applying the soundscape standards, and serving the needs of an aurally diverse population. The failure to mention a particular noise source should not be taken to mean those policies do not apply to it.

It was also suggested that by limiting the scope to airborne sound, in order to focus our attention on the terrestrial environment, we were inadvertently excluding people who listen through felt vibration. This is a valid point for us to consider. However, expanding the Plan's scope to include vibration would require additional stakeholder engagement and the development of new content and delay the Plan's publication into 2024. Instead, we commit to exploring this apparent gap in the coming years, with a view to including policies addressing vibration in the next update to the Plan.

Noise and air quality

We will promote the overlaying of spatial data on air quality, noise, health outcomes, deprivation and other relevant indicators when prioritising local interventions under a refreshed local air quality management regime, as we implement the Environment (Air Quality and Soundscapes) (Wales) Bill.

Since launching this consultation, we published our [new noise maps](#) on DataMapWales. They go beyond the requirements of the Environmental Noise (Wales) Regulations 2006 by covering all roads and all railways in Wales for the very first time. In its response to the consultation, the CIEH calls for noise maps to be overlaid with air quality maps to identify the communities that face the greatest burden to health and quality of life in the future and who are less likely to benefit from national trends. We agree that we must continue to break down policy siloes, and so fully accept this recommendation.

Heat pumps

The Welsh Government welcomes the MCS Charitable Foundation's willingness to work with the Welsh and UK Governments to introduce rapid improvements to the MCS 020 assessment methodology. We anticipate that these improvements, once implemented, will enable us to update the rules for permitted development rights for domestic air source heat pumps in Wales in a way that does not expose people in densely populated areas to an unacceptable risk of noise nuisance from the rollout of this important decarbonising technology.

Onshore wind turbines

Several members of the public and organisations responding to the consultation called for the Noise and Soundscape Plan to be strengthened in relation to onshore wind, with priority given to updating the current guidance on the back of WSP's recently published review of ETSU-R-97, commissioned by the UK Government. Some called for planning applications for wind farms to be put on hold until updated guidance is agreed and published. By contrast, responses received from the renewable energy sector questioned the inclusion of onshore wind in the Plan at all, asserted that the planning system in Wales is fair and balanced and ensures that the right development happens in the right place at the right time, and disagreed with the suggestion that the existing noise assessment methods require updating.

All noise guidance requires updating from time to time to keep pace with scientific knowledge and technological developments, and it would be an anomaly to treat the UK's wind turbine noise guidance any differently from British Standards whose contents are reviewed and updated at set intervals as a matter of course. No noise guidance should be considered set in stone and exempt from challenge or suggestion that it has room for improvement. As a minimum, the WSP review of ETSU-R-97 raises questions that need to be answered by professional organisations with expertise in this field such as the IOA and CIEH. Guidance becomes out of date over a period of years rather than overnight, and should be reviewed and updated with sufficient frequency that it never becomes unfit for use.

By the same token, it would also be an anomaly if we were to put wind farm applications on hold while guidance is reviewed and, where judged necessary, updated. When guidance documents or British Standards for other types of noise undergo reviews, the existing guidance continues to apply until the update is completed and the revised guidance adopted. As stated in Annex E of the new Noise and Soundscape Plan, "*decision-makers and their advisors should always refer to the most recent standards and best practice guidance available at the time when carrying out their assessments, to the extent that they are compatible with the requirements of Welsh Government and local government policy*". Until new professional guidance is produced in response to the findings of the WSP review and adopted by government, the current guidance remains in force.

Noise arising from military activities

Several responses were received raising concerns around military low flying in Wales, and also around noise from firing ranges.

The Ministry of Defence is not one of the public bodies subject to the Well-being of Future Generations (Wales) Act. Nevertheless, in its response to the consultation the MOD stated its support for the five ways of working. The Welsh Government welcomes this, and hopes that the concerns expressed by Welsh residents relating to military noise in certain locations can be addressed and overcome by application of these core principles. Welsh Government officials will be happy to assist where they can in improving the lines of communication between the MOD and those affected by military noise in Wales.

Expert advice on soundscapes

We are committed to continue our long-standing practice of engaging the right experts to advise us on the wide-ranging questions that will face us in this policy area the coming years, from amending the planning rules for heat pumps to upskilling the profession in soundscape techniques. However, we do not feel that the case has been made for formally appointing a single advisory committee aiming to cover the entire breadth of this policy area.

We commit to keeping this proposal under review in the coming months and years, and be open to any further representations making a case for a formally appointed soundscapes advisory panel.