

Synopsis of Consultation Responses

Policy Guidance for the Identification and Designation of Quiet Areas

Ards and North Down Borough Council	<p>No comments</p> <p>Noted.</p>
Antrim and Newtownabbey Borough Council	<p>The draft Policy Guidance suggested that councils may wish to visit candidate quiet areas to ensure that the public have access to the land, that it remains open space and that it does not experience high levels of noise which are not reflected in the noise maps.</p> <p>The council confirms that:</p> <ol style="list-style-type: none"> 1. The public still has access to the land (Carnmoney Hill Upper) and it remains open space; and 2. There are no new noise sources that have been introduced since 2011. <p>Noted.</p>
Mid and East Antrim Borough Council	<p>Mid and East Antrim support the designation of Bashfordlands as a 'quiet area'. It will help to maintain a much used haven of quiet within the Greater Belfast agglomeration, with the additional benefit of its 'Quiet Area' designation potentially attracting visitors to the area.</p> <p>The Department notes this comment and agrees that quiet area designations could make an area more appealing to visitors.</p> <p>Given the continuing pressures on local government finances, Mid and East Antrim Borough Council do not wish to be burdened with excessive monitoring, managing and mitigating responsibilities with respect to Bashfordlands.</p> <p>The guidance states on page 4 that Councils 'should' monitor noise levels. This is not a mandatory requirement under the Environmental Noise Directive. Thus, the Department does not consider this to be an 'excessive' burden. Councils can rely on noise maps (published every 5 years by the Department), to assess noise levels within quiet areas. However, the Department considers that monitoring may be useful to enable a district council to familiarise its self with the noise climate within its designated Quiet Areas. Monitoring is also a prudent way of ensuring that a district council becomes aware of any noise increases at an early stage, allowing them to take appropriate action early. The Department's Guidance on the Identification and Designation of Quiet Areas does not prescribe a strict regime of monitoring. This is intentional. The district council, as owner of the land, is best placed to determine the extent of any monitoring necessary.</p>



The Department has confirmed that it has responsibilities to intervene if it considers that a Competent Authority is in breach of the Regulations. Given that Mid and East Antrim Borough Council has only a very limited or absence statutory mechanism in managing transport and Part A PPC regulated industrial noise sources, it is recommended that responsibility for monitoring and managing designated quiet areas lies with the Department/Competent Authorities that have direct responsibilities for the noise sources.

Under the Environmental Noise Regulations (Northern Ireland) 2006 (the Regulations), the designated Competent Authorities have responsibility for management of the sources of noise covered by the Environmental Noise Directive. The Competent Authorities and their respective noise sources are as follows:

- Department for Regional Development – roads
- Translink – railways
- Department of the Environment – Industry
- George Best Belfast City Airport – this airport
- Belfast International Airport – this airport

These Competent Authorities have, as part of their obligations under the Environmental Noise Directive and the Regulations, prepared Noise Action Plans. These plans set out the actions that Competent Authorities will take to manage noise in certain areas (designated Noise Management Areas). The Action Plans have been formally approved/adopted by the Minister for the Environment. It is also a requirement of the Regulations that the Competent Authorities' Action Plans should aim to protect quiet areas in agglomerations against an increase in noise. The Department has no reason to believe that the Competent Authorities will not comply with the obligations set out in their Action Plans. The Department has powers under the Regulations to intervene if it believes that a Competent Authority is in breach of the Regulations.

Following the transfer of planning functions to the district councils in April 2015, it is now the district councils that have primary responsibility for controlling development, and issues such as noise amongst other things. District councils can refuse planning consent or can use planning conditions and planning agreements to restrict/control proposed developments. District Councils also have the power to control noise through their creation of local development plans and the zoning of land. Such powers can be used to directly control the activities that go on in quiet areas and in the areas adjacent to a Quiet Area. As it is district councils that possess these powers, the Department believes that they are the most appropriate entities to manage Quiet Areas. Councils can also use the powers in the Clean Neighbourhoods and Environment Act (Northern Ireland) 2011 to address noise from other sources, such as neighbourhood noise.



	<p>The Strategic Planning Policy Statement for Northern Ireland also gives weight to the designation of Quiet Areas and to the noise being treated as a material consideration in the determination of planning applications.</p> <p>The Department has compared the location of the candidate quiet areas to the location of industrial noise within the Belfast agglomeration. The Industry Lden noise map shows that the candidate quiet area are not located near to areas of industrial noise and therefore will be relatively unaffected by industrial noise. Thus, the Department does not consider this to be an issue for Mid and East Antrim Borough Council.</p>
Belfast City Council	<p>On 12 January 2016 this consultation was considered by Belfast City Council’s People and Communities Committee. The Committee decided that it does not support the designation of Ligoneil Park and Tullycarnet Park and Bowling Green as candidate Quiet Areas pursuant to the Environmental Noise Regulations (NI) 2006. This decision will be subject to ratification by full Council when it next meets at the start of February.</p> <p>The Department is disappointed with this response given the health and wellbeing benefits (particularly the benefits for mental health) associated with quiet areas, together with the considerable public interest in this policy proposal. 36 of the 42 consultation responses received are from members of the public/community groups suggesting that additional areas be designated.</p> <p>The Committee agreed to seek further dialogue with the Department, particularly with regard to the following concerns: The first concern surrounds the 2 parks and potential limitations and restrictions that the Council would face with any proposed development or change of use for them in the future if they were to be designated as Quiet Areas.</p> <p>Designation does not mean that any new development proposals within or adjacent to a Quiet Area cannot proceed. Rather it will require careful consideration so as to ensure that the current noise environment is fully protected from all noise sources. Competent Authorities (Department of Regional Development, Translink, Belfast International Airport, George Best Belfast City Airport, Department of the Environment) responsible for noise sources covered by the Environmental Noise Directive will be required to consider the noise impact of development proposals close to or adjacent to designated areas and reflect this in their noise action plans.</p> <p>From the consultation process to date, the Council is not satisfied that there will be any benefit to the rate payer in the proposed designation of Tullycarnet Park and Bowling Green and Ligoneil Park as Quiet Areas.</p>



The Department disagrees with this statement. Of the 42 consultation responses received, 36 are from members of the public/community groups suggesting that additional areas be designated. There is a clear public desire to have quiet areas designated.

The World Health Organisation states that noise can seriously harm human health and interfere with people's daily activities at school, at work and during leisure time. Depending on the level of noise and its duration, the main health risks identified by the World Health Organisation include pain and hearing fatigue, impaired hearing, altered behaviour (such as aggression of feelings of helplessness), interference in speech and communication, sleep disturbance, cardiovascular effect, reduced academic and professional performance and altered hormonal responses (including increased hormone levels, altered metabolism and weakened immune system).

According to the World Health Organisation Burden of Disease from Environmental Noise Report (2011), at least one million healthy life years are lost every year in western Europe due to noise from road traffic noise. Environmental noise is also considered to be the second worst environmental cause of ill-health.

The European Environment Agency states in its 2014 Good Practice Guidance on Quiet Areas, that people recover faster in natural surroundings, an effect which seems applicable to quietness and natural sounds. This Guidance also states that the benefits of quiet areas in agglomerations can be estimated via the increase of property values. The direct effect of lower sound-pressure levels is estimated to be approximately 0.5%/dB.

There is growing policy and emphasis on the positive role of open space, especially green space, in helping to ameliorate some of the problems of urban living. In a survey carried out by the charity Environmental Protection UK, 91% of respondents felt that quiet areas needed protection. This is understandable given the wide array of medical conditions that can arise due to noise exposure.

If designated as Quiet Areas, that would be detrimental to any future development proposals should the Council wish to change the use of these parks in the future. Their designation could also have potentially limiting impacts upon development of the wider area.

The Department notes that Belfast City Council may consider changing the use of some of its parks in the future. The Department accepts that a quiet area, like any other land designation, could have potentially limiting impacts on development of the wider area. However, this is the purpose of a quiet area designation: to control/restrict development in and around a quiet area so as to ensure noise levels do not increase.



The Council is in the process of formulating its local development plan and it is therefore premature for this Area to be subject to a designation as a Quiet Area particularly in light of the lack of certainty with regards to de-designation.

The Department considers that this is an ideal time to designate candidate areas as inclusion in LDPs is one of the legal mechanisms of protection for these areas. Newly designated areas can be included in LDPs at this early stage and as such can be afforded immediate protection.

Departmental officials have advised that in the event that the Council request the designation be revoked, the Department would consider that request. However they did advise that only a very robust and compelling case for revocation will be considered and such revocations would be very rare, especially given the possible application of sanctions against the Department if they fail to comply with the European Noise Directive (END). Therefore a procedure for de-designating a Quiet Area needs to be developed to provide land owners some degree of reassurance that if they agree to their land being designated the Department will de-designate the Quiet Area provided the landowner can meet certain criteria.

The Department will review the list of Quiet Areas at least once every 5 years, following completion of noise mapping, to ensure that designations are still appropriate.

Should a council request that the Department revokes a Quiet Area, the Department will consider this request. In doing so, the Department will consider the results of the most recent round of noise mapping, any noise monitoring data available, the reasons for any increase in noise, the proportion of the Quiet Area which exceeds 55 dB Lden consolidated, the extent of the exceedance, the noise levels in the vicinity of the Quiet Area, the options for reducing noise in the quiet area, the availability of an alternative Quiet Area and any other relevant factors. However, only a very robust and compelling case for revocation would be considered. Revocations will be very rare. For example, the DEFRA guidance states that in exceptional circumstances, for example to accommodate a nationally significant infrastructure project, it may be deemed necessary to revoke an END quiet area. The Department will consider the merits and demerits of adopting a similar approach to that adopted by DEFRA and will amend the Guidance, a section relating to revoking a Quiet Area.

The Council is also concerned regarding its responsibility for maintaining and managing designated Quiet Areas when at present there are no existing policies or guidance to assist / direct the Council in doing so, nor any clarity on the consequences for failing to meet those responsibilities.

Failure to designate quiet areas may result in a UK wide infraction for failure to comply with the Environmental Noise



Directive. Any infraction fines relating to Northern Ireland would be passed on to the Northern Ireland Executive.

The Department disagrees that there are no existing policies or guidance to assist / direct the Council in managing quiet areas. The Department's draft Guidance on the Identification and Designation of Quiet Areas assists councils in managing quiet areas. The Guidance is intentionally non-prescriptive to give district councils the opportunity and flexibility to manage their quiet areas in such a way that fits with their current public open space policies and management practices. A more prescriptive regime could place an increased resource and financial burden on district councils. Furthermore, district councils are referred to the Noise Policy Statement for Northern Ireland, the Strategic Planning Policy Statement, their Local Development Plans and the recently published European Environment Agency Good Practice Guide on Quiet Areas (2014) for additional guidance.

In nominating candidate areas for designation within the Belfast agglomeration, it appears that only Council land with a minimum area of 5 hectares was considered. It is surprising that only Council land was identified within the Belfast area as being suitable. No rationale for determining the applicable area has been provided and it seems unreasonable to use such criteria in the context of a major city. The Council would therefore recommend that the criteria should be revised in order to consider other more suitable areas.

The Department does not agree that it is unreasonable to consider designation public parks and open spaces. The rationale is clear, and it has been explained to Belfast City Council during meetings and correspondence: public parks and open spaces are already frequented by the public; they are open to all members of the public free of charge; they may already be valued by the public for their quietness and council management practices may already be preserving quietness or promoting positive soundscapes, through, for example, creating wildlife habitats to encourage bees and birds, installing water features or planting trees/hedges which act as noise barriers. Other areas not in public ownership do not provide full access to the general public or may limit access to particular groups or members and therefore were ruled out on that basis.

Whilst the Council is supportive of the principle of Quiet Areas and wishes to assist the Department in assuring compliance with END, the designation of Quiet Areas should be appropriate and transparent.

The procedure used in identifying quiet areas was based on current practice across the UK and Europe. The initial datasets of open spaces were provided by district councils. A publically available web app was created to demonstrate the location of parks against the noise levels experienced in those areas. This web app is interactive and available on the Department's website (<https://www.doeni.gov.uk/services/quiet-area-interactive-map>).



	<p>They should not be, as they appear at present, an unjustified interference with a landowners Convention rights. The Council would therefore seek further dialogue with the Department in order to pursue its concerns and recommendations as highlighted above.</p> <p>Belfast City Council refers to Convention rights, but does not set out the legal principles to which it refers. Nor does it state how the Department's guidance is allegedly interfering with such rights.</p> <p>It is assumed that the council is referring to Article 1 of the First Protocol to the European Convention on Human Rights.</p> <p>The Department has taken legal advice as regards this issue and does not consider that a breach of Article 1 of the First Protocol has, or will occur.</p> <p>The Department intends to liaise with Belfast City Council on the concerns raised during the consultation before a final decision is made on the proposed quiet area designations.</p>
Michael Bogan	<p>Requests that Ormeau Park be designated as a quiet area.</p> <p>All of Ormeau Park exceeds the 55 dB Lden consolidated threshold. This is the threshold above which, any area is considered too loud to be designated. Thus, it is too loud to be considered for designation as a quiet area based on the current criteria. The purpose of designating Quiet Areas is to protect areas that are already quiet. The designation does not operate so as to reduce noise levels where they are already loud (greater than 55 dB Lden consolidated, for the purposes of this Policy Guidance). You are referred to the Quiet Area app on the Department's website https://www.doeni.gov.uk/articles/noise</p>
Joan NcAfee	<p>Requests that Ormeau Park be designated as a quiet area. See response above</p>
John Wright	<p>Requests that Ormeau Park be designated as a quiet area. See response above</p>
Brian Corry	<p>Requests that Ormeau Park be designated as a quiet area. See response above</p>



Professor Jim McLaughlin (two responses received)	Requests that Ormeau Park be designated as a quiet area. See response above
Jan Mancuska	Requests that Ormeau Park be designated as a quiet area. See above
John Clarke	Requests that Lagan Meadows be designated as a Quiet Areas. 16% of Lagan Meadows and 96% of Lagan Lands East exceed the 55 dB Lden consolidated noise level. This is the threshold above which, any area is considered too loud to be designated. Thus, neither area fulfils the criteria for designation. The purpose of designating Quiet Areas is to protect areas that are already quiet. The designation does not operate so as to reduce noise levels where they are already loud (greater than 55 dB Lden consolidated, for the purposes of this Policy Guidance). You are referred to the Quiet Area app on the Department's website https://www.doeni.gov.uk/articles/noise
Michael Toner	Requests that Lagan Meadows be designated as a Quiet Area. See response above
Mechthild Clarke	Requests that Lagan Meadows be designated as a Quiet Area. See response above
Alun Evans	Asks why Lagan Valley Regional Park has not been selected as a possible quiet area. Lagan Valley Regional Park consists of a number of separate parks. 16% of Lagan Meadows, 96% of Lagan Lands East 79% of Clement Wilson Park and all of Sir Thomas and Lady Dixon Park exceed the 55 dB Lden consolidated noise level. Thus, these areas, taken together or separately, do not fulfil the current criteria for designation. The purpose of designating Quiet Areas is to protect areas that are already quiet. The designation does not operate so as to reduce noise levels where they are already loud (greater than 55 dB Lden consolidated, for the purposes of this Policy Guidance). You are referred to the Quiet Area app on the Department's website https://www.doeni.gov.uk/articles/noise
Tony Gormley	Requests that Malone Meadows be included as a quiet area.



	<p>Did you advertise this for comments from residents?</p> <p>The Department understands that Malone Meadows is also known as Lagan Meadows.</p> <p>See response above</p> <p>The Department advertised the consultation on the consultation section of its website. The consultation document and draft guidance were also sent to a number of interested parties, including NICVA (Northern Ireland Council for Voluntary Action), whose membership includes a number of residents and community groups. NICVA circulated details of the consultation in its regular bulletin.</p>
Brian Gadd (Old Stranmillis Resident's Association)	<p>Requests that Ormeau Park and Lagan Meadows be designated as quiet areas.</p> <p>All of Ormeau Park, 16% of Lagan Meadows and 96% of Lagan Lands East exceed the 55 dB Lden consolidated threshold. Thus, they are too loud to be considered for designation as a quiet area based on the current criteria.</p> <p>The purpose of designating Quiet Areas is to protect areas that are already quiet. The designation does not operate so as to reduce noise levels where they are already loud (greater than 55 dB Lden consolidated, for the purposes of this Policy Guidance). You are referred to the Quiet Area app on the Department's website https://www.doeni.gov.uk/articles/noise</p>
Brid Coady Weekes (two responses)	<p>Requests that Ormeau Park and Lagan Meadows be designated as quiet areas.</p> <p>See response above</p>
Hilary Brady	<p>Requests that Ormeau Park and Lagan Meadows be designated as quiet areas.</p> <p>See response above</p>
Colm McNamee	<p>Asks that Ormeau Park and Lagan Meadows be designated as quiet areas.</p> <p>See response above</p> <p>What is the point in setting up mountain bike trails and establishing keep fit equipment in Ormeau Park if there is to be no relief from the unremitting roar of aircraft and the constant din of road traffic?</p>



	<p>This question relating to the rationale for mountain bike trails should be redirected to Belfast City Council which owns and has management responsibilities for Ormeau Park.</p> <p>There are no candidate Quiet Areas in south Belfast. The proposals are unbalanced and unfair.</p> <p>The Department developed the policy guidance and the three criteria set out within it to ensure that the methodology for selection was fair, equally applied across the agglomeration and transparent. GIS computer mapping software was used to identify the areas using current noise maps and thus, there was no scope for bias. The approach was rigorous and transparent. Where there are no proposed quiet areas in a particular location, it is because no areas fulfilled the Department's current criteria. The Department also developed an interactive mapviewer which is available to the public on the Department's website. This allows the public to look at the location of parks within the Belfast agglomeration and to turn on and off the noise levels which are low enough so as to constitute a quiet area within the Department's current quiet area criteria. Areas that do not show low noise levels on the web viewer can easily be identified as being above the quiet area 55dB Lden criteria.</p>
Mary Blair	<p>Requests that Ormeau Park and Lagan Meadows be added to the list of Candidate Quiet Areas.</p> <p>See above</p>
Marie Quiery	<p>Requests that Ormeau Park and Lagan Meadows be added to the list of Candidate Quiet Areas.</p> <p>See above</p>
Mike Wilson	<p>Requests that Seapark, Holywood be designated as a quiet Area. The noise at Seapark/Marino when aircraft are taking off can be quiet unbearable.</p> <p>Seapark, Holywood cannot be designated as a quiet area as it does not fulfil the criteria set out in the Department's draft Guidance for the designation of such areas. 11% of Seapark exceeds the 55dB Lden consolidated criterion. You are referred to the Quiet Area app on the Department's website https://www.doeni.gov.uk/articles/noise This demonstrates that a portion of the part is already louder than 55 dB Lden consolidated criteria and thus is too loud to be considered. The purpose of designating Quiet Areas is to protect areas that are already quiet. The designation does not reduce noise levels where they are already greater than 55 dB Lden consolidated.</p>



Caroline Mercer	<p>Requests that Ormeau Park, Lagan Meadows and Seapark be designated as Quiet Areas.</p> <p>All of Ormeau Park, 11% of Seapark, 16% of Lagan Meadows and 96% of Lagan Lands East exceed the 55 dB Lden consolidated threshold. Thus, they are too loud to be considered for designation as a quiet area under the current draft guidance.</p> <p>The purpose of designating Quiet Areas is to protect areas that are already quiet. The designation does not operate so as to reduce noise levels where they are already loud (greater than 55 dB Lden consolidated, for the purposes of this Policy Guidance). You are referred to the Quiet Area app on the Department's website https://www.doeni.gov.uk/articles/noise</p>
Pauline McDonald	<p>Requests that Ormeau Park, Lagan Meadows and Seapark be designated as quiet areas.</p> <p>See response above</p>
George Hewitt	<p>Supports the policy, saying that it is very important to have places of refuge from the relentless pace of modern life. He was surprised to see that Ormeau Park, Lagan Meadows and Seapark were not included and expressed concern about noise from George Best Belfast City Airport expansion and traffic on the Sydenham bypass.</p> <p>See response above</p> <p>The Competent Authorities have taken these sources of noise into account in their Action Plans in line with the requirements of the Environmental Noise Directive. These Action Plans have been approved or adopted by the Minister.</p> <p>Links to all the Action Plans are included below:</p> <p>George Best Belfast City Airport http://www.belfastcityairport.com/Images/GBBCA-Final-Noise-Action-Plan-2013-2018.aspx</p> <p>Belfast International Airport https://www.doeni.gov.uk/publications/belfast-international-airport-environmental-noise-directive-round-two-noise-action-plan</p> <p>Department for Regional Development https://www.doeni.gov.uk/publications/belfast-international-airport-environmental-noise-directive-round-two-noise-</p>



	<p>action-plan</p> <p>Translink https://www.doeni.gov.uk/publications/translink-ni-railways-environmental-noise-directive-round-two-noise-action-plan-2013</p> <p>Department of the Environment https://www.doeni.gov.uk/publications/industry-environmental-noise-directive-round-two-noise-action-plan-2013-2018</p> <p>The Department has passed the concerns regarding airport expansion and traffic noise to the relevant Departments.</p>
Austin Hopkirk	<p>Requests that Ormeau Park, Lagan Meadows and Seapark be designated as quiet areas. We already have one international airport at Aldergrove and I believe that George Best airport should be restricted in the number of flights over Belfast and fines should be increased for breaching restrictions of flight times.</p> <p>See response above</p> <p>Comments are noted. Your concerns have been passed to the Planning Department.</p>
Ian LW Webb	<p>Requests that Ormeau Park, Lagan Meadows and Seapark be designated as quiet areas. See response above</p>
Jessica Kidd	<p>Requests that Ormeau Park, Lagan Meadows and Seapark be designated as quiet areas. See response above</p>
Kate Evans	<p>Requests that Ormeau Park, Lagan Meadows and Seapark be designated as quiet areas and states that Lagan Meadows is within the sound limits required to be designated as a quiet area. See response above</p>
Naill Fitzduff	<p>Requests that Seapark and Ormeau Park be designated as quiet areas. See response above</p>

Sheilah Bradley	Requests that Ormeau Park, Lagan Meadows and Seapark be designated as quiet areas. See response above
Paul Gibson	Requests that Ormeau Park, Lagan Meadows and Seapark be designated as quiet areas. Queries why flights need to increase in Belfast when there is an airport in Antrim and asks what is the point of a Regional Planning Policy. See response above Your query regarding the purpose of regional planning policy has been passed to the relevant Department.
Mari Fitzduff	Delighted to hear of the consultation re quiet areas in Belfast, and wish to applaud this initiative. Requests that Ormeau Park, Lagan Meadows, Seapark and Victoria Park be designated a quiet areas. All of Ormeau, Victoria Parks, 11% of Seapark, 16% of Lagan Meadows and 96% of Lagan Lands East exceed the 55 dB Lden consolidated threshold. Thus, they are too loud to be considered for designation as a quiet area. The purpose of designating Quiet Areas is to protect areas that are already quiet. The designation does not operate so as to reduce noise levels where they are already loud (greater than 55 dB Lden consolidated, for the purposes of this Policy Guidance). You are referred to the Quiet Area app on the Department's website https://www.doeni.gov.uk/articles/noise
Joe Campbell	Requests that Seapark, Lagan Meadows and Ormeau Park be included as quiet areas. Why is Victoria Park not included? See response above
Raymond Moffett	Asks why Victoria Park has not been designated and recommends that Seapark be designated as a quiet area. See response above
Andrew Dougal	Requests that Ormeau and Victoria Park be included in any noise assessments. Why is the Department minded to exclude these parks and others e.g. Lagan Meadows and Seapark? See response above Can you give an assurance that you and your colleagues in the Department will adopt an approach to this issue which is



	<p>totally scientific and objective?</p> <p>The Department developed the policy guidance and the three criteria set out within it to ensure that the methodology for selection was fair, equally applied and transparent. The Department further developed an interactive mapviewer which is available to the public on the Department's website. This allows the public to look at the location of parks within the Belfast agglomeration and to turn on and off the noise levels which are low enough so as to constitute a quiet area within the Department's criteria. This enables the public to see how the Department came to the decisions as to which parks to put forward for designation. The Department believes that the approach used was rigorous and scientific.</p> <p>Requests that the Department will make known any representations received from vested interests of a commercial nature. All responses to the consultation are included in this Synopsis which will be published on the Department's website.</p>
John Arthurs	<p>Commends the Department for the proposal to create quiet areas, but regrets the necessity for such action. The problem has been caused by the Department's planners tacitly allowing Belfast City Airport to gradually increase its level of noise pollution over a wide area around the airport. I was very disappointed to learn that Victoria Park is already too noisy to be included.</p> <p>John urges the Department to include Seapark, Redburn and Ballymenoch parks in the list of quiet areas.</p> <p>Seapark and Ballymenoch Parks cannot be designated as a quiet area as they do not fulfil the current criteria set out in the Department's draft Guidance for the designation of such areas. 11% of Seapark and 91% of Ballymenoch Parks exceed noise threshold of 55dB Lden consolidated. The purpose of designating Quiet Areas is to protect areas that are already quiet. The designation does not reduce noise levels where they are already greater than 55 dB Lden consolidated. . You are referred to the Quiet Area app on the Department's website https://www.doeni.gov.uk/articles/noise</p> <p>Pursuant to the legislative requirement of the Environmental Noise Directive, the Department is only designating Quiet Areas within the Belfast agglomeration. Redburn Country Park falls outside the boundary of the agglomeration. Thus, it is not eligible for consideration.</p>
Caroline Hill	<p>Requests that Ormeau and Orangefield Parks, Lagan Meadows and Seapark be designated.</p> <p>See responses above with regard to Ormeau, Lagan Meadows and Seapark.</p>



	<p>Orangefield Park cannot be designated as a quiet area as it does not fulfil the current criteria set out in the Department's draft Guidance for the designation of such areas. 3.9% Orangefield Park exceeds noise threshold of 55dB Lden consolidated. The park is already too loud to be considered 'quiet' based on the current criteria. You are referred to the Quiet Area app on the Department's website https://www.doeni.gov.uk/articles/noise</p>
Jack Pease, Noise Bulletin	<p>The screening includes 'ribbons' e.g. canal paths, but none are put forward as Candidate Quiet Areas. Is this because there are no ribbons in Belfast or because any ribbons failed the 'greater than 5 hectare' screen?</p> <p>Town/city parks and gardens, river banks/canals and seafronts/promenades as listed on page three of the Guidance on the Identification and Designation of Quiet Areas, are not criteria for designation. They are merely examples of the type of land that <u>could</u> be designated a quiet areas, should the areas in question meet the three criteria (land type, noise and minimum area).</p> <p>The raw data of public parks and open spaces which was provided by district councils did include 'ribbons' of land. These areas were screened out because they failed to meet the noise or minimum area criteria, or because, on looking at specific areas in more detail, they were considered unsuitable for designation. An area may have been considered unsuitable, if, for example, it is used as a transport route.</p>
Belfast City Airport Watch	<p>DOE criteria of land type filter/noise level filter/minimum area filter will be widely regarded as inadequate unless need is also considered. Need will be greatest in areas of greatest population density.</p> <p>It is unfair to expect central urban dwellers to travel a distance to experience calm and relaxation.</p> <p>Suggests designation of Ormeau Park, Lagan Valley Regional Park and Seapark. The latter two fulfil criteria of town/city parks and gardens, river banks/canals and seafronts/promenades.</p> <p>The point about need is noted. However, the Department can only designate as quiet areas, those areas which are already relatively quiet compared to the rest of the agglomeration. As such, it is not possible to consider the travel distance or ensure a certain pattern/spread of designated quiet areas across the agglomeration. This would arguably create a bias in the manner in which areas were selected for designation. The areas on the outskirts of an agglomeration may be quieter and thus, may be more likely to have areas that are already relatively quiet.</p>



	<p>Lagan Valley Regional Park consists of a number of separate parks. 16% of Lagan Meadows, 96% of Lagan Lands East 79% of Clement Wilson Park and all of Sir Thomas and Lady Dixon Park exceed the 55 dB Lden consolidated noise level. Thus, these areas, taken together or separately, do not fulfil the current criteria for designation.</p> <p>All of Ormeau and 11% of Seapark exceed the 55 dB Lden consolidated threshold. The purpose of designating Quiet Areas is to protect areas that are already quiet. The designation does not operate so as to reduce noise levels where they are already loud (greater than 55 dB Lden consolidated, for the purposes of this Policy Guidance). You are referred to the Quiet Area app on the Department's website https://www.doeni.gov.uk/articles/noise</p> <p>Please note that town/city parks and gardens, river banks/canals and seafronts/promenades as listed on page three of the Guidance on the Identification and Designation of Quiet Areas, are not criteria for designation. They are merely examples of the type of land that <u>could</u> be designated a quiet areas, should the areas in question meet the three criteria (land type, noise and minimum area). There is no requirement to have such areas designated as quiet areas.</p>
<p>Belfast City Airport Watch (second response)</p>	<p>Want to bring Dublin City Council's approach to the Departments attention. BCAW wished to see the Department emulate the excellent example provided by Dublin City Council and the Irish government in this regard.</p> <p>The Department is aware of this approach. The Department developed its criteria and methodology for the identification and designation of Quiet Areas based on an extension of established good practice across the UK and Europe. The Dublin City Council approach was considered as part of this review.</p> <p>It is unfair to expect central urban dwellers, who can often be disadvantaged in other ways, to have to travel a distance to experience calm and relaxation.</p> <p>Our view is that the designation of quiet areas in the Belfast agglomeration must aim to ensure that all citizens in the areas of greatest population density have easy access to at least one quiet area, even where they do not have access to a car.</p> <p>The Department can only designate as quiet areas, those areas which are already relatively quiet compared to the rest of the agglomeration. As such, it is not possible to consider the travel distance or ensure a certain pattern/spread of designated quiet areas across the agglomeration. This would arguably create a bias in the manner in which areas were selected for designation.</p> <p>Requests that Orangefield and Greenville Parks and the section of the Connswater Greenway from Beersbridge Road to</p>



	<p>Orangefield and Greenville parks be designated.</p> <p>Based on the dataset of parks supplied by Belfast City Council, Orangefield and Greenville Park appear to be the same park. The park cannot be designated as a quiet area as it does not fulfil the current criteria set out in the Department's draft Guidance for the designation of such areas. 3.9% of Orangefield Parks exceeds the noise threshold of 55dB Lden consolidated. The vast majority of the section of the Connswater Greenway referred to also exceeds the 55dB Lden criteria. The purpose of designating Quiet Areas is to protect areas that are already quiet. The designation does not reduce noise levels where they are already greater than 55 dB Lden consolidated. You are referred to the Quiet Area app on the Department's website https://www.doeni.gov.uk/articles/noise</p> <p>Connswater Greenway fulfils the DOE criteria for recreational areas for river banks/canals.</p> <p>Noted. Consideration will be given to other areas following publication of noise maps in June 2017.</p> <p>Orangefield and Greenville Parks and the section of the Connswater Greenway from Beersbridge Road to Orangefield and Greenville park fail to meet the criteria in whole or part, we ask that the area be designated as a Relatively Quiet Area in recognition of the fact that it offers a place of relative calm.</p> <p>Based on the current draft guidance the Department is not considering designating relatively quiet areas. However, this point is noted and the Department will bear this in mind when considering any future changes to the approach.</p>
George Best Belfast City Airport	<p>The Department's approach is not robust and it is necessary to decouple the criteria for, and process of designation quiet areas. A two-two stage consultation process should be adopted.</p> <p>The Department developed the policy guidance and the three criteria set out within it, to ensure that the methodology for selection was fair, equally applied and transparent. The Department further developed an interactive mapviewer which is available to the public on the Department's website. This allows the public to look at the location of parks within the Belfast agglomeration and to turn on and off the noise levels which are low enough so as to constitute a quiet area within the Department's criteria. This enables the public to see how the Department came to the decisions as to which parks to put forward for designation.</p> <p>The Department did not consult on the criteria and areas separately as the criteria are meaningless without having been applied to the relevant data. The Department believes that a consultation covering both the criteria and candidate quiet</p>



areas is more informative and of greater relevance to members of the public who can see the proposed outcome of the policy in practice.

The consultation period does not allow time for the necessary assessments and appraisals (site visits and noise assessments) of the candidate quiet areas to be carried out.

It is the district councils that are expected to consider the sites and perhaps undertake site visits or some noise monitoring. None of the councils have commented that the 12 week consultation period was insufficient. The Department is aware that district councils were able to undertake site visits in the time available.

It is unclear from the consultation paper whether the Department may designate new quiet areas which are not the subject of consultation.

The Department will not designate a quiet area without first having undertaken a public consultation. If the Department is to consider additional quiet areas in the future, it will put these areas forward in a public consultation.

The Departments criteria and general process fail to require a site specific assessment or to specify that actual noise levels at the time of designation should be taken into account.

The Department's approach, as set out on page four of the draft Guidance on the Identification and Management of Quiet Areas, allows the councils to undertake further site assessment, as they consider necessary. The Department recognises, that as it is the district councils that own and manage these areas, they are the bodies best placed to confirm the appropriateness of designation.

Conor Park/Stricklands Glen is on an existing flight path for flights departing from BCA. The airport is concerned that formal designation of this candidate quiet area could pose restrictions to flights to/from the airport from flying over this area and/or on future changes in flight paths that may be required.

Noted. Any quiet area designated will require all Competent Authorities to consider their actions and any noise impacts on such an area, and reflect on this in their Action Plans.

George Best Belfast City Airport is already a contributor to noise levels within the Belfast agglomeration. This noise is managed through the existing planning agreement which restricts the hours of operation, limits the number of air traffic



movements and seats for sale in a one year period as well as through the Noise Action Plan.

The designation of any quiet area will have the potential to affect any proposal for development in the locality. The existence of a quiet area will be taken into account by the district council when determining and application for planning permission in conjunction with all other material considerations.

Belfast City Airport notes the close proximity of the Strictlands Glen candidate quiet area to the Sewage Pumping Station and the proposed upgrade to the pumping station as part of NI Water's wider Bangor Sewerage Improvement Scheme.

The Department is aware of the future work planned for this locality. The proposed works are temporary and the noise increase during this period of construction should not be used to prevent the designation of an otherwise suitable candidate quiet area. The Department and Ards and North Down have discussed this issue.