



Representing the interests of Barbican Residents

Barbican Association Response to the City's Noise Strategy 2017

Our experience as residents is that the area around the Barbican estate has got gradually noisier over the past couple of decades. We think a real increase in noise incidents that cause nuisance is probably the driver of the increased number of calls to the noise pollution team.

We therefore welcome this strategy and most of the policies and actions described.

Our comments below are confined to policies and actions that we think should be emphasised or extended or where we disagree. We have followed the order of the report.

10 key aims

We support these.

We note particularly No 5 – “Balance the mitigation and minimisation of noise impacts with need to improve and update City infrastructure.”

The balance does not seem right to Barbican residents at present:

*Construction work can go on for years beside residences, as one building project succeeds another

*Most construction sites need better noise mitigation, this includes the use of more up to date technological solutions to noisy vehicles and ancillary work on sites, and better management of noise generating activities

* Residential areas (where there is a concentration of residences) need better protection than the rest of the City.

*This should include no construction work at weekends

No 10 – we are unclear about soundscapes and how can they can protect tranquil places.

1. Background

Noise issues round Barbican: the Barbican Association's experience

The sources of noise that residents complain about include:

1. Construction sites – We understand these are temporary, but individual sites can be working for 3-4 years, and if there is much development going on, as on the south East of the estate, this can last for many years. Crossrail works have gone on for almost a decade and have caused intermittent problems

2. Underground railways noise

Confined to some areas of the estate, but broadly distributed around the estate

3. Noise from non-residential neighbours

The Arts Centre

Occasional arts events can cause disturbance into the evening, though in general these are well managed, and consultation is reasonably good

Commercial activities within the Arts Centre cause unnecessary nuisance because of old structures and plant: lack of double glazing in rooms rented for parties; old ventilation plant, which is noisy

CLSG

During the daytime the school playing field is a source of disturbance to the flats overlooking it. However, this is understood by residents. What is not acceptable is noise in the evenings from the playing fields (not currently used) and from the gym – which is rented out to volleyball players. The school's management plays an important part in keeping this noise manageable, but the lack of sound insulation to the gym and the fact that the activity goes on 4 evenings a week until 9 pm makes the environment stressful for the few flats that are near it

3. Public access to public areas

At night (from about 8 pm onwards) the area of and around the Barbican is quiet. Members of the public making a noise between 11 pm and 7 am can and do disturb residents' sleep.

Places of particular concern are: the Lakeside Terrace (though this is managed by the Arts Centre's security staff)

St Giles's Terrace – unmanaged

Beech Street - unmanaged

Moor Lane - unmanaged

Silk Street – people leaving the Arts Centre and Milton Court are partially managed.

In the last four places most disturbance is from patrons leaving nearby bars and clubs noisily

4. Neighbour noise

The main problem here is noise caused by flat refurbishments. Whilst residents understand the way that noise from building works carries across the floors in this concrete structure, an especially noisy development recently has been the fitting of false ceilings during a refurbishment. This work involves drilling many holes in the ceiling for the supporting frame for the plaster board, a lengthy task and very noisy. In some cases this has taken several months to complete with residents unable to be in their flats during the day. We would welcome some discussion about the way this work could be carried out with a less intrusive method, perhaps linking the Planning and Environmental Health Departments and the developer.

Noise from music is relatively low (except in summer) because the Barbican is well constructed. Uninsulated wooden floors (not allowed in the lease) do cause unwanted noise for flats below.

5. Others

These include:

Terraces on newer office buildings. Clusters of people gathering on roof terraces can cause disproportionate amounts of disturbance. The noise rises and reverberates around the area.

Helicopters – which seem to be more frequently hovering around the area, rather than simply passing over

Roadworks

Delivery vehicles – operating in the early hours of the morning.

1.1.3 Threat to health

Since residents live in the City, there is no escape from noise if the City is noisy.

We accept that we live in the middle of a dense, busy, commercial area, but the Barbican and Golden Lane estates together form an area that was designed for housing – with layouts that signify it is housing. They form two of the designated residential wards in the City of London.

Residents have a reasonable expectation that they should be able to sleep undisturbed – a right recognised by the WHO standards for noise at night time (existing levels in the Barbican are at the upper limit of that) – and recognised in this strategy.

But residents also have a reasonable expectation that their “out of working hours” time should also be relatively tranquil. That means evenings (from say 7 pm) and weekends. If the evenings are not acknowledged as a quiet time (and many City decisions on things like delivery hours, hours of operation of terraces seem to dismiss the need for evenings to be quiet) then residents are subjected to a noisy environment through all their waking hours, with the only respite when they go to sleep. That is not reasonable.

Saturday mornings are already ruled out of quiet times by the allowing of noisy work from 8am to 1pm.

As residences are “sensitive areas” within noise legislation we would like to see:

- Tighter conditions on evening use of external doors to bars and restaurants and off terraces
- No noisy works allowed on Saturday mornings on construction sites that are within 100 metres of a concentration of residences. The local plan acknowledges that the North of the City contains such a concentration of residences. Other local authorities forbid noisy work on Saturday mornings in residential areas.
- Better enforcement of Best Practicable Means for noise reduction – eg “white noise” protectors for lorry movements, electric vehicles, no idling etc

Policy – Evidence 3. We value the 24/7 noise complaints service.

We would like to see the service offer, when appropriate, sound monitors that allow sounds to be monitored over extended continuous periods. We believe this is common practice in other local authorities.

An example would be when a resident is particularly affected by particular activities near them, which go on over a long period. Spot checks do not reveal the persistent cumulative effect of long periods of noise disturbance.

Actions - Evidence

1.4.1 We support the installation of a permanent noise monitoring network including a real time web based interface available to all interested stakeholders.

The key to this is establishing objective goals (largely missing from the document) on the basis of subjective aspirations (of which there are plenty in the document, and mostly very fine too), and then measuring the soundscape properly. The ideal would be a network of fixed monitoring instruments across the City which could gather sound information continuously providing a living map of the soundscape.

We would welcome the introduction of the idea of measuring sound travelling through buildings, and through the fabric of buildings (e.g. the concrete of the Barbican).

We would be pleased to suggest places around the Barbican estate where such monitors could be installed.

2. New Developments

Page 22 We note that the current Local Plan for North of the City includes “protecting noise sensitive areas such as the main residential areas of the Barbican, Golden Lane, Barts Square, and Barts Hospital

- That implies that the policies that relate to noisy activities *in that area* should be modified to recognise the sensitive nature of that area

2.3.1 Demolition and construction

We ask for better enforcement of hours of work and best practicable means

We have been discussing with environmental health the merits of an early meeting between resident representatives, the noise team, and the contractor to go through the contractor's method statement and check that it includes everything it possibly could to mitigate nuisance

Also, we have been discussing the provision of a checklist of the sort of mitigation measures contractors should be taking – so that residents can be more informed in discussing mitigation with contractors and developers and in complaining to the Noise team.

We also ask for better enforcement of the code when breaches are reported

2.3.2 Building services and plant

The current requirement for 10% below background noise isn't working. Plant sound – even from new plant – continues to disturb residents.

Please consider either more precise measurements of sound or moving to a best technology requirement.

Please see Appendix on noise measurements and the problems with the current regime.

2.3.3 Leisure facilities

We seek a "buffer zone" around the estate so that no more licensed premises are allowed to have entrances/exits on the streets immediately overlooked by flat windows – many of which are bedrooms.

Essentially we are seeking no more permissions for Aldersgate Street, the lower end of Goswell Road, Silk Street, Moor Lane, Fore Street, Wood Street

2.3.4 Servicing

Lorry and other service movements do cause disturbance since the background noise at night around the Barbican is relatively quiet (see p 9 of this strategy). We value the protection offered by the current restriction of servicing activity between 2300 and 0700 and do not want to see it watered down.

We are sceptical that consolidation centres near residences can adequately have noise mitigated. Acoustic baffling does not protect against the sound of arriving lorries or the human activity that accompanies a delivery lorry.

Policy- New developments

2.4.1.b Plant noise. Current policy isn't working and residents are disturbed by new plant. Please consider how this measure can be better specified and enforced.

2.4.1.c Code of Construction.

We think that Saturday morning working should not be allowed near residential areas. This protection for sensitive areas would only affect a few developments in a few streets but would bring considerable respite to residents living next to building sites

Please improve enforcement of Best Practicable means.

2.4.1.g To resist the introduction of noise generating activities such as leisure or entertainment venues into areas of strong residential character. We fully support this policy and would like to see it articulated in geographical terms.

In the case of the Barbican Estate this buffer zone would include Aldersgate Street, the lower end of Goswell Road, Silk Street, Moor Lane, Fore Street, Wood Street, the exposed part of Beech Street.

3.3.2 Railway noise

The Barbican Estate is particularly susceptible to noise and vibration from London Underground (LUL) trains. The "box" through which the sub-surface lines travel between Barbican and Moorgate stations is an integral part of the structure of homes above the LUL tracks. This means that noise and vibration is directly transmitted to bedrooms and living rooms. Further, at the eastern end of the Estate the floors of homes are very close to the roof of the tunnel box running into Moorgate station and directly underneath some homes there is a crossover (points) which, when trains pass over them, generate significant noise and vibration. New rolling stock on the sub-surface lines has, unfortunately and perhaps contrary to LUL's expectations increased noise pollution.

The levels of noise (measured by LUL at various dates and locations in the last two years) significantly exceed World Health Organisation (WHO) norms and interrupt sleep to such an extent that, according to WHO norms, train noise constitutes a risk to health. The sub-surface lines run underneath the Barbican from c 5.15am to c1230 am. Trains thus run for more than 4 hours of the period designated as sleep time by the WHO. The night tube, if and when the sub-surface lines are integrated into LUL's night tube service, will extend this period when people are particularly sensitive to noise pollution. Unlike construction and other daytime noises, noise and vibration from LUL's sub-surface lines impact adversely on Barbican residents' sleep and rest times. Further, LUL's proposed re-signalling of the sub-surface lines is intended to facilitate higher frequencies of train running: more trains and faster trains will increase noise and vibration and the noise pollution experienced by Barbican residents.

Much could be done to mitigate noise and vibration pollution from LUL's sub-surface lines. Some track was relaid in summer 2016 (albeit without state of the art noise reducing track fixings) and over the c 10%-20% of the total track length running under the Barbican Estate noise and vibration seems to have been reduced somewhat (though a new source of noise seems to have been introduced where the new track joins old, unrenovated, track). If all the track between Moorgate and Barbican stations were renewed to the best modern standards and the crossover towards the western end of Moorgate station were moved to a less sensitive location (LUL have suggested moving it to Liverpool Street station though no firm date has been established) much would have been achieved.

Barbican residents recognise that they live in the centre of a great city: some noise nuisance is inevitable. But noise from the sub-surface lines could be significantly reduced if LUL were to undertake a relative modest upgrading of its tracks. Urban rail infrastructures of a similar vintage (eg the S-Bahn in Berlin and the best parts of London's own Overground network) show what can be done.

3.3.2 Helicopter noise

Residents accept the use of helicopters by the emergency services and that these will sometimes be disturbing.

Residents do not, however, understand why their peace should be disturbed by helicopters hovering overhead for filming or other purposes, particularly when this happens on many weekends. It is also unreasonable that the weekends should be disturbed before 10 am.

Policies - Transport 2

Residents would support a policy that the City Noise pollution team should act as a central point for receiving complaints about any noise, including that from helicopters, even if they don't have powers to deal with it. That would allow data on the scale of the problem to be collated.

Policies - Transport 3

Residents support the incorporation of noise reduction design and materials into future street works.

Policies – Transport 12

Acceptable noise management measures also need to include management of the people as well as the vehicle. A silent vehicle attended by noisy drivers can be more disruptive than the engine noise.

Actions- Noise complaints

4.3.4 We support review of the current Code of Construction

- More detail on best practicable means and newest most effective technologies
- Meeting with interested stakeholders at the outset of a construction project to understand the Methods statements
- Better enforcement when contractors do not observe the code

Section 5 Protecting and enhancing the acoustic environment

We note that the NPPF requires local plans and decisions to “identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason”

We appreciate the subjective and aspirational goals, but we need those goals expressed as objective measurable targets too.

The CITY SOUNDSCAPE MANAGEMENT PROCEDURE on page 51 says the right kind of things, but the "Establish unambiguous soundscape objectives" need to be expressed in objective terms, even if they are informally expressed as things like "Must be able to have a conversation at certain locations/places without having to shout.". For example, how loudly can the participants of the imagined conversation speak before this is deemed shouting? How good are their ears? How old are they? Instead how about something like "A tone generator at 10 meters distance must be detectable across all human audible frequencies using <a measurement device> with a difference from background at each 1/8th octave of n dB (dB at this resolution is fine) ..." ... or something like that.

Policy - soundscape 3

The centre of the Barbican is one of very few areas in the City that meets WHO recommended levels of sound for gardens (of less than 55 dB_{Aeq}). It is important that it remains below that level. We would like the City to commit to preserving the quiet places and times when these are particularly valued by the local community – given that it has so few.

Appendix A - A plea for more sensitive measurements of sound

A good parallel is drawn on p47 & 48 of this Strategy between a landscape (cityscape) and a soundscape. Both are complex multi-faceted things, both are measurable in many ways - for example a landscape has spatial dimensions but also colour and brightness and reflectivity. A soundscape also has spatial dimensions but instead of colour and brightness it has sound frequency and volume.

Taking this parallel just a bit further, imagine a landscape representation which muted colour (i.e. light frequency) and presented everything as a grayscale. The equivalent to this omission of colour in a soundscape would be to mute the information about sound frequency, and that's exactly what the

dBA and dBC (the most common measures of sound levels) do; they are both averages of sound across all frequencies in just the same way that grey mushes together colours (light frequencies).

In context ... the recent question of plant noise being 10% below background noise and yet still being a nuisance is explained by thinking of sound as colour. Background sound is measured in dB(A) and give us the equivalent of a certain brightness of grey. Now think of plant producing a low noise. Low frequency light is red, so think of the new noisy plant machinery being as a fairly bright red light which is *on average* 10% dimmer than the current background grey, but of course the new bright red light stands out ... because it is *much* brighter than the other red sources in the background.

The document mentions "dB LAeq" (p50). This measure is even worse than dBA and dBC because it averages over frequencies *and* time. To go back to the light analogy, imagine a disco light that flashed lots of different colours. dBA and dBC would show the light as just grey, but you could still see it flashing. Now think about the disco light flashes, sometimes the light is dim and sometimes suddenly really bright, well "dB LAeq" would average the flashes over time and show a steady even brightness. How would that reflect the reality of standing near a disco light? It would not, of course. How can a "dB LAeq" measure reflect the reality of being on the Heathrow flightpath or near a noisy pub? It would not, of course.

(We are not arguing against having dBA, dBA and dB LAeq *as well* since these can be handy for measuring changes over longer periods, like months or years.)

14 October 2017

Please contact Jane Smith, Chair, Barbican Association, with any queries

chairBA@btinternet.com