



Law Society
of Scotland

Consultation Response

Draft Noise Action Plans

November 2018



Introduction

The Law Society of Scotland is the professional body for over 11,000 Scottish solicitors. With our overarching objective of leading legal excellence, we strive to excel and to be a world-class professional body, understanding and serving the needs of our members and the public. We set and uphold standards to ensure the provision of excellent legal services and ensure the public can have confidence in Scotland's solicitor profession.

We have a statutory duty to work in the public interest, a duty which we are strongly committed to achieving through our work to promote a strong, varied and effective solicitor profession working in the interests of the public and protecting and promoting the rule of law. We seek to influence the creation of a fairer and more just society through our active engagement with the Scottish and United Kingdom Governments, Parliaments, wider stakeholders and our membership.

Our Environmental Law sub-committee welcomes the opportunity to consider and respond to the Scottish Government's consultation on the draft Noise Action Plans.¹ The sub-committee has the following comments to put forward for consideration.

Consultation Response

Question 1 Do you consider there has been anything left out of the action plans? If so, what do you consider has been omitted?

There is a lack of specific measures within the plans to cut noise, and no clear objectives to do so. There appears to be little emphasis placed on the significance of cutting noise in order to improve health. In this context, no account is taken of the new noise thresholds which are recommended in a recent publication² from the World Health Organisation (WHO). This would merit further consideration.

It is important for the Noise Action Plans to be 'joined up' with other proposals and areas of work. For example, it is not clear how a de-carbonisation of transport would affect noise levels. Also, the plans do not address measures for reducing traffic noise, for example traffic reduction or a reduction to speed limits. Again, if these measures are to be included, real targets would require to be set, which are not currently included in the plans.

¹ <https://consult.gov.scot/environment-forestry/consultation-on-draft-noise-action-plans/>

² World Health Organisation, Environmental Noise Guidelines for the European Region 2018, http://www.euro.who.int/_data/assets/pdf_file/0008/383921/noise-guidelines-eng.pdf?ua=1

Question 2 Is there anything you consider should be discussed at the Scottish Government Noise Steering Group during the next 5 year cycle for Round 4?

We consider that objectives and targets should be discussed and set in order to reduce noise. These targets should be considered in the context of the latest WHO guidelines. There would also be merit in discussion on other measures which would cut noise, for example traffic reduction and lower speed limits.

Question 3 Do you consider enough is being done to protect quiet areas?

We do not seek to comment on whether enough is being done to protect quiet areas. We recognise that the creation of quiet areas is an attractive proposition. However, the creation of such areas should not be at the expense of noise levels elsewhere and there requires to be suitable balancing of interests.

Question 4 Do you have any views on the overall proposals in the draft Action Plans?

The plans lack substantive targets for actions and therefore it is not clear that they will result in effective action to significantly reduce noise levels.

For further information, please contact:

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