

Consultation on the Code of Practice on Noise from Ice-Cream Van Chimes, Etc., 1982

Consultation response by the Noise Abatement Society, 30 May 2012

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About the Noise Abatement Society

Established in 1959, the Noise Abatement Society (NAS) works towards the abatement of excessive and unnecessary noise for the benefit of all. In 1960, NAS supported passage of the Noise Abatement Act, which established noise as a statutory nuisance in the UK for the first time. The Society operates the UK's only National Noise Helpline, offering free advice in response to around 1500 enquiries per annum.

NAS works with industry, central and local government, residents, the public sector, general public, science and academia and other NGOs to achieve pragmatic solutions to noise pollution issues of national significance. For example, it pioneered a quiet and sustainable out of hours transport delivery solution called the Silent ApproachTM to benefit local residents, local authorities and industry as they seek to address the compound issues of road congestion, safety for all road users, CO₂ and particulate emissions reduction and noise pollution.

NAS is campaigning nationally via its Love Your Ears^{CTM} programme to raise awareness of early onset of deafness in youth due to MP3 player misuse; has established a programme with the Association of Noise Consultants to test, validate and recommend quieter goods and machinery called Quiet Mark^{CTM}; and hosts an annual awards ceremony in the House of Commons to recognise local authorities, organisations and individuals who exemplify best practice in lessening noise pollution.

As part of its membership of the EU COST Action TD0804 on “Soundscapes of European Cities and Landscapes” and ISO Working Group 54 on “Perceptual Assessment of Soundscape Quality”, the NAS is exploring practical approaches towards better soundscapes focusing on soundscape issues related to health, quality of life and restorative functions of the environment; to provide the opportunity to raise awareness and promote communication on soundscapes among the general public, stakeholders and those involved in policy; including encouraging exploration of new

ways of listening in local soundscapes, and new ways of tackling noise and improving local soundscape quality. As such, the NAS is working to provide opportunities to discuss how soundscape concepts might, alongside tackling conventional noise problems, contribute to local planning and environmental improvement as part of stakeholder engagement processes in local communities, towns and cities.

This approach aligns with the Government's own *Noise Policy Statement for England* which references its "Guiding principles of sustainable development"¹ that it will: *Use Sound Science Responsibly – Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.*

The NAS also provides a liaison service between local authorities, local people and industry when considering the environmental and social impacts of services and infrastructure to local communities including transport, recreational areas, entertainment venues and large scale infrastructure projects.

Who NAS represents

In preparation for this response NAS has consulted members and stakeholders including local government, subject matter experts, industry and members of the public.

INTRODUCTION

The Noise Abatement Society (NAS) welcomes this opportunity to respond to the consultation on the *Code of Practice on Noise from Ice-Cream Van Chimes, Etc., 1982*. However, the NAS would like to note its surprise and concern that its views were not sought during the pre-consultation process described in section 2.13 of the Consultation Document. As the UK's only registered Charity who's sole remit is to find solutions to noise pollution problems, we do not understand how a reasonable review of "noise stakeholders" could not have included the NAS.

The NAS would also like to express its further concern that Paragraph 2.13 of the Consultation Document is prejudicial, referring to "initial discussions with noise stakeholders that suggest that they are not overly concerned by a relaxation of the Code". Government should not prejudge the positions of stakeholders on the basis of cursory discussions in which people may be reserving their positions in the context of Prime Ministerial comments which may themselves be considered prejudicial.

¹ *Securing the future – delivering UK sustainable development strategy*, HM Government, March 2005, as quoted in the *Noise Policy Statement for England*, Department for Environment, Food and Rural Affairs, March 2010, <http://www.defra.gov.uk/environment/quality/noise/>, (1.8) p 4, Accessed 31 March 2012.

The NAS fails to understand how a consultation on adding more noise into sensitive environments benefits anyone or is aligned with any of the principles, aims or objectives of the Government's *Noise Policy Statement for England*².

The NAS would like to go on record to clearly state that it does not support the view of other "noise stakeholders", as stated in Section 2.13 of the Consultation Document, of being "not overly concerned by the relaxation of the Code". The exact opposite is true.

OVERVIEW

The use of chimes in public streets is a form of aggressive selling and noise pollution that would not be countenanced for other industries. It abuses and seeks to bypass the relationship between children and their parents/guardians, exploiting the 'pester power' of children.

It is especially irresponsible to encourage such selling practices of 'fast food' and sugary treats for children. Parents may be concerned at child obesity, encouraging healthy eating and may want to protect their children from aggressive selling and the attendant peer pressure from other children. People can usually get ice cream from plenty of other outlets, including convenience shops and supermarkets, which do not use inane noise pollution to force their attention on citizens who have a basic human right to peace and quiet in their own homes.

As has been well documented in numerous studies, noise can cause annoyance and fatigue, interfere with communication and sleep, reduce efficiency and damage hearing. Long undisputed by practitioners and underpinned by the World Health Organisation in its report *Burden of disease from environmental noise, quantification of healthy life years lost in Europe (World Health Organization 2011, www.euro.who.int)*³, "the health impacts of noise are a growing concern among both the general public and policy-makers in Europe".

The WHO report presents a summary of "synthesized reviews of evidence on the relationship between environmental noise and specific health effects, including cardiovascular disease, cognitive impairment, sleep disturbance and tinnitus".

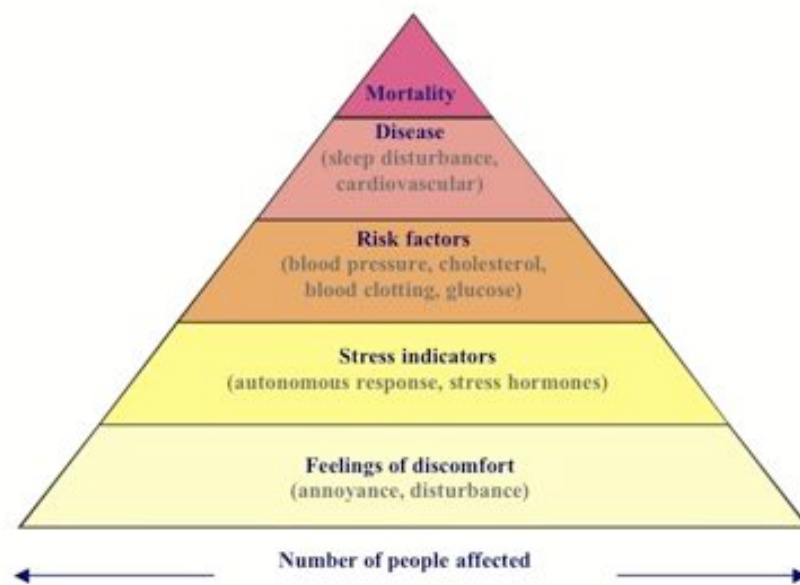
² *Noise Policy Statement for England*, Department for Environment, Food and Rural Affairs, March 2010, <http://www.defra.gov.uk/environment/quality/noise/>, Accessed 31 March 2012.

³ *Burden of disease from environmental noise, Quantification of healthy life years lost in Europe*; The WHO European Centre for Environment and Health, Bonn Office, WHO Regional Office for Europe; World Health Organization 2011. ISBN: 978 92 890 0229 5; www.euro.who.int.

The publication demonstrates how “the environmental burden of disease methodology, based on exposure–response relationship, exposure distribution, background prevalence of disease and disability weights of each outcome [it investigated], was applied to calculate the burden of disease in terms of disability-adjusted life-years (DALYs)”.

It shows that “with conservative assumptions applied to the calculation methods, estimated DALYs lost from environmental noise were 61 000 years for ischaemic heart disease, 45 000 years for cognitive impairment of children, 903 000 years for sleep disturbance, 22 000 years for tinnitus and 587 000 years for annoyance in the European Union Member States and other western European countries”.

Fig. 7.1. Severity of health effects of noise and number of people affected



Source: Babisch (3).

Figure 1 (2). Wolfgang Babisch model as illustrated in the report *Burden of disease from environmental noise, quantification of healthy life years lost in Europe*, published by the World Health Organization 2011.

The elevation of the adverse effects of noise pollution on the health and wellbeing of EU citizens has been graphically represented by Wolfgang Babisch (Figure 1) and provides a sobering illustration of the progression from a state of prolonged annoyance to mortality on humans.

Callers to the NAS’ National Noise Helpline give a human voice to these findings with their appeals for help heard on a daily basis:

‘Ever since we moved in my life has been hell. I don’t want to go home sometimes but there’s nowhere else to go.’

'I am a prisoner in my own home because of noise.'

'I can no longer tolerate the noise. I have not slept properly in weeks.'

It is not unusual for highly distressed callers to the Helpline to cry on the phone.

The NAS' National Noise Helpline was established in 2006 and operated originally Monday through Friday during normal working hours. Since April 2010 it has been operational 24/7. The Helpline has never been widely advertised and has always provided free, confidential and impartial support and advice. It has received approximately 3500 calls to date. The fact that callers to the Helpline have had to search out and find a little known resource in their attempt to find help and answers gives weight to their experience.

The scale of the problem is further underpinned in a survey conducted by Which? that found "at least five million people are currently annoyed with their neighbours, and over 10 million have had a neighbour problem in the last year"⁴.

The survey polled "2,561 British adults aged 16+ from 10-16 May 2011 about their experiences with annoying neighbours currently, and in the last twelve months. 31 per cent of people are currently annoyed, or have been annoyed with their neighbours in the past year. Which? estimates 10 per cent of GB 16+ adults are currently experiencing problems with neighbours. Based on a GB 16+ population of 48.8 million, this equates to between 4.4 and 5.5 million people (using a 95% confidence interval)".

It is against this backdrop of our own experience, those of the callers to our helpline and the considerable evidence as to the adverse health effects of noise pollution, that it is NAS' strong view that given the many disturbances that residents are already required to put up with in the built environment, there is no justifiable reason to encourage unnecessary noise disturbance in order to encourage unhealthy eating practices among young people and the attendant health risks this will engender later in life.

RESPONSES TO CONSULTATION QUESTIONS

Option 1 - Keep the Code as it is (i.e. make no changes)

Q1A. Are you supportive of this option? Why?

⁴ *Noise tops list of 10 million neighbour complaints, finds Which?* 16 June 2011; <http://www.which.co.uk/about-which/press/press-releases/product-press-releases/which-legal-service/2011/06/noise-tops-list-of-10-million-neighbour-complaints-finds-which/>, Accessed 30 June 2011.

Yes. This is our strongly preferred option. The Code has stood the test of time, and has only become an issue in the context of the 'Red Tape Challenge'. In terms of process, it does not involve any more 'Red Tape' to keep to the current provisions of the Code than it would to keep to changed provisions. Thus, if the Code is kept (which the industry want), there is no justification in the strict terms of 'Red Tape' for the provisions to be changed.

In terms of substantive issues, the number of ice cream vans has been falling, not because of the Code, but because a good choice of ice cream is available at reasonable prices from many other places, and most people now have fridges. The concept of going street-by-street, distracting and potentially annoying everyone in an area, merely to sell ice cream to a few, is simply unnecessary. Such practices date from times when the products were genuinely perishable (e.g. when sourced from winter ice kept in deep pits in a few locations), when people did not have refrigerators in their homes, and few shops sold ice cream, and when there were fewer alternative forms of advertising.

Q1B. Do you think that the Code causes any problems in its current state?

NAS believes that, ideally, residents and others should not have to put up with aggressive selling in the form of deliberate noise making. The Code in its current state established a balance between noise makers and noise sufferers that has stood the test of time. If chiming now becomes more persistent and intrusive, the tolerance of residents may be stretched. Government should recognise the risk of a backlash leading an outright ban.

NAS acknowledges that the Code is 'anecdotally, not always fully complied with' (paragraph 2.12 of consultation document). However, it is entirely wrong to assume that relaxing the Code would not result in increased annoyance. If ice cream sellers currently exceed the Code on chime length, relaxing the Code to match their current practice does not mean that is what will continue to happen. This is like 'raising the speed limit to reflect reality', when some motorists will drive even faster, exceeding the new limit. Some noise makers are likely to exceed the boundaries of the higher level, just as they did of the lower.

Q1C. Do you have any data on the current costs to mobile vendors, local authorities or local residents (e.g. complaints, levels of annoyance) as a result of the current Code? Please provide details.

NAS does not have costs data, other than complaints regularly received from noise sufferers. In 2010 and 2011, 10% of complaints to the NAS Noise Help Line have concerned outdoor noise (excluding road traffic, entertainment and people noise) causing noise disturbance to people in their homes from the chimes, delivery vehicles

or similar sounds. Complaints data does, of course, significantly understate the overall adverse impact of intrusive and unnecessary marketing noise. For every person who complains, many more 'suffer in silence'.

Measures of annoyance also understate the potential adverse impacts. Noise may add to general stress, and affect health and wellbeing, even when we do not necessarily register conscious annoyance as previously noted and referenced in the Overview at the beginning of this Consultation Response.

Q1D. Do you have any data on the current benefits to mobile vendors, local authorities or local residents (e.g. sales generated) as a result of the current Code? Please provide details.

NAS does not have such data. It is important that any 'sales generated' figures supplied by the industry make a proper distinction between sales generated when vans are driving around streets, and when they are stationary for substantial periods, e.g. in or at the entrance to parks or other popular 'people draws'. Anecdotally, the latter mode of operation, which is, of course, also better in climate change terms, seems to have become more common, and it is important that relevant sales are discounted for the purposes of considering the Code.

Option 2 - Keep the Code but make it less restrictive.

Q2A. Are you supportive of this proposed change (from 4 to 12 seconds)? Why not? Please suggest alternatives if appropriate.

No. Playing chimes for longer is more likely to annoy people, and may thus reduce trade, not increase it.

The consultation states: 'This change would allow mobile vendors to advertise their arrival for longer, and therefore may increase trade.' There is no evidence that this would be the case. Even if it were, the interests of vendors should not be put above those of people who want to be left in peace and children who need to be encouraged to eat healthily rather than consume sugary treats in greater abundance.

People who may be open to being persuaded to buy the product are apprised of its presence by the initial sound of the chime. Hearing the whole tune is irrelevant to their decision as to whether or not to buy ice cream. Under the current Code, vendors are free to choose chimes which are more suitable for a 4 second playing period than those with longer refrains.

Making more noise for longer violates the Government's own "Noise Policy Aims" in

its *Noise Policy Statement for England*⁵ which state that it will aim to: *Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development: avoid significant adverse impacts on health and quality of life; mitigate and minimise adverse impacts on health and quality of life; and where possible, contribute to the improvement of health and quality of life.*

NAS repeats its aforementioned point acknowledging that the Code is 'anecdotally, not always fully complied with' (paragraph 2.12 of consultation document). However, it is entirely wrong to assume that relaxing the Code would not result in increased annoyance. If ice cream sellers currently exceed the Code on chime length, relaxing the Code to match their current practice does not mean that is what will continue to happen. As with motorists and speed limits, some noisemakers will push the boundaries of the higher level, just as they did of the lower.

Q2B. Are you supportive of this proposed change (from 3 to 2 minutes)? Why not? Please suggest alternatives if appropriate.

No. Again, playing chimes more frequently is more likely to annoy people, and may thus reduce trade, not increase it.

The consultation states: 'This change would allow mobile vendors to chime more frequently, and therefore may increase trade.' There is no evidence that this would be the case. Even if it were, the interests of vendors should not be put above those of people who want to be left in peace and children who need to be encouraged to eat healthily rather than consume sugary treats in greater abundance.

Q2C. Are you supportive of this proposed change (to once when stationary)? Why not? Please suggest alternatives if appropriate.

No. There will be streets where suitable parking places are in very short supply, so chiming may occur outside the same residents' windows every time the street is visited.

The consultation states: "... the industry suggested that chiming when driving and looking for somewhere to stop could be more hazardous than chiming when stationary." Defra should seek independent specialist advice on the overall road safety risks associated with relevant practices, including distraction to other drivers when chiming occurs, whether moving or stationary. Defra should also include in its

⁵ *Noise Policy Statement for England*, Department for Environment, Food and Rural Affairs, March 2010, <http://www.defra.gov.uk/environment/quality/noise/>, (1.7) p 4, Accessed 31 March 2012.

assessment any potential change in road accidents to children, cyclists and other buyers, if trade were to increase as hypothesised.

Q2D. Are you supportive of this proposed change (on approach or at a selling point)? Why not? Please suggest alternatives if appropriate.

No, for the reasons set out in response to Q2C.

Q2E. Are you supportive of no change (in sight of another vehicle which is trading)? Why? Please suggest alternatives if appropriate.

Yes. NAS supports no change. Chiming by two or more vehicles close to each other would compound adverse impact, and there could also be a risk of competitive chiming. Ideally, the criterion would be 'within earshot' of another vehicle which is trading, so that residents would not be subjected to combined sources, but this may be difficult operationally, since what is within earshot for vendors and residents may differ.

Q2F. Are you supportive of no change (within 50 metres of schools, hospitals, places of worship)? Why? Please suggest alternatives if appropriate.

Yes. NAS supports no change. Ideally, chiming should not occur within earshot from inside schools, hospitals or places of worship. This is difficult to assess on a generalised basis, but would be likely to require more than 50 metres separation. The serious health implications of the childhood obesity epidemic make it particularly important that schoolchildren are not exposed to aggressive selling of ice cream.

Q2G. Are you supportive of no change (not more often than once every 2 hours in same length of street)? Why not? Please suggest alternatives if appropriate.

Yes. NAS supports no change. NAS does not consider that an exception for mobile food vendors in business parks is either appropriate or necessary. Firstly, it should not be assumed that people in business parks are necessarily less noise sensitive than residents; and employers may not want their workers distracted unnecessarily from tasks such as require concentration. Secondly, businesses take large numbers of other deliveries which do not rely on announcing their arrival with noise. Most food vendors tend to follow a routine pattern of distribution, and, for example, can present themselves to a reception desk and workers can be alerted by internal means if the employer does not wish to allow a vendor to circulate freely within a building.

Q2H. Are you supportive of no change (no louder than 80 dB(A) at 7.5 metres)? Why not? Please suggest alternatives if appropriate.

Yes. NAS supports no change. Ideally, it would be lowered, since chimes may be

audible on calm summer afternoons across residential areas very much larger than could physically access the relevant mobile vendor, particularly where buildings are non-continuous such as detached and semi-detached houses. This noise limit should certainly not be raised. If chiming is allowed more often, and certainly for stationary vehicles, then a much lower limit should be set.

Q2I. Are you supportive of this proposed change (to 'areas of low background noise')? Why? Please suggest alternatives if appropriate.

Yes. NAS supports this change, to avoid confusion with Quiet Areas identified under the Environmental Noise (England) Regulations 2006 (as amended).

Q2Ji. Do you support a change in the times between which it is an offence to sound your chimes? Why not?

No. NAS does not support a change in times, for the reasons set out below under 2Jii and iii.

The wording of this 'your chimes' question betrays bias, making it apparent to respondents that the consultation is aimed primarily at the mobile vending industry, and not those who suffer the impacts of their out-dated marketing practices. This compounds the Noise Abatement Society's concern that Defra appeared to have undertaken extensive discussions with vendors and the chimes industry before going out to public consultation, while having only unrepresentative contact with noise stakeholders.

Q2Jii. Do you have any evidence to support or reject an earlier start time of 10:30 am (or any other earlier time)?

NAS does not consider that an earlier start time to allow mobile vendors to sound chimes before lunchtime in business parks is either appropriate or necessary.

Again, it should not be assumed that people in business parks are necessarily less noise sensitive than residents, and employers may not want their workers distracted unnecessarily from tasks such as require concentration. And again, businesses take large numbers of other deliveries which do not rely on announcing their arrival with noise. Most mobile vendors to business parks tend to follow a routine pattern of distribution, and, for example, can present themselves to a reception desk, and workers can be alerted by internal means if the employer does not wish to allow a vendor to circulate freely within a building.

Q2Jiii. Do you have any evidence to support or reject a later end time to after 8:00 pm (or any other later time)?

NAS does not think there is any convincing evidence to support a later end time. The consultation document refers to 'the time of peak ice-cream trade.' The evening is, of course, the time when more people are at home than earlier, and are likely to be eating. However, it is also the time when very many people are expecting to relax after the day's activities, and are likely to be more annoyed by unsolicited marketing noise.

The consultation document also refers to the industry having argued 'anecdotally that children's bedtimes are later than they used to be.' If indeed children were more likely to be awake, this does not mean aggressive sellers of sugary snacks should have free reign to exploit children's 'pester power'. Children also have rights to peace and quiet and to not be exposed to entirely unnecessary attempts to entice them to eat less healthily.

Q2Jiv. Are there any other changes to section 62 of COPA that you would support? Why?

No. NAS does not believe changes to include delivery as well as sale of perishable goods are in any way justified. The consultation document refers to the industry seeking to legitimate 'the use of chimes to signal the delivery of goods that have already been paid for (e.g. mobile take-away and pizza vans).' The mass availability of telephones, mobile phones and doorbells makes it frankly bizarre that anyone would suggest reverting to the use of noise for such purposes. There is no reason why the peace and quiet of people's homes should be invaded because a delivery driver is too lazy to get out of the vehicle and use a doorbell, or use a phone. It is, of course, against the law for a taxi driver or private motorist to use a horn outside premises when picking up or setting down people, and it should remain so for mobile vendors delivering food.

Q2K. Do you have any data on the potential costs to mobile vendors, local authorities or local residents (e.g. in terms of increased numbers of complaints or levels of annoyance) if these proposals were implemented? Please provide details, including whether the costs apply to an individual proposal, or the cumulative effect of implementing all of the proposals.

NAS is not in a position to make independent predictions of increased numbers of complaints or levels of annoyance. Impact assessment should not, however, be overly narrow, e.g. a crude cost-benefit analysis taking account only of quantifiables. Assessment should also take account of the fact that many more people are likely to be annoyed than complain. Encouraging reversion to primitive forms of aggressive selling may have wider social and cultural implications in terms of declining consideration for other's welfare and quality of life.

Q2L. Do you have any data on the potential benefits to mobile vendors, local

authorities or local residents (e.g. in terms of increased sales) if these proposals were implemented? Please provide details, including whether the costs apply to an individual proposal, or the cumulative effect of implementing all of the proposals.

NAS does not have such data itself. NAS considers it highly unlikely that increased use of chimes would result in increased sales - it could just as easily annoy potential customers and reduce sales.

The consultation is wrong to assume that increased sales by mobile vendors should be counted as a benefit. It is only a private benefit to the traders, not a public benefit. For example, ice cream would otherwise be bought from other retail outlets in more cost-effective ways with higher productivity for the economy as a whole. If additional sales were to be generated, this could further increase NHS costs at a time when there is already an obesity epidemic associated with mass marketing of fattening foods.

Q3A. Are you supportive of this option (option 3 - keep the Code, but in the form of a non-statutory Industry Code of Practice, led and managed by relevant industry bodies, rather than the Government)? Why/why not?

No. The consultation states that the industry is not in favour of this option. This argues against a non-statutory code proving workable or enforced.

Q3B. Do you have any data on the potential costs to industry bodies, mobile vendors, local authorities or local residents (e.g. in terms of implementing and managing a Code, complaints or levels of annoyance) if this option were taken? Please provide details.

No, but NAS would expect higher costs in terms of complaints, levels of annoyance and losses to health and quality of life.

Q3C. Do you have any data on the potential benefits to industry bodies, mobile vendors, local authorities or local residents (e.g. in terms of sales generated) if this option were taken? Please provide details.

No, but see response to Q2L above.

Q4A. Are you supportive of this option (option 4 - remove the Code)? Why/why not?

No. In theory, removing the Code would give greater freedom to local communities to establish their own balance between competing interests within the law. However, spending cuts to local authority noise services make it less likely that there would be adequate resources for environmental health officers to pursue enforcement action

that would be likely to be more expensive in the absence of the Code.

Q4B. Do you have any data on the potential costs to mobile vendors, local authorities or local residents (e.g. in terms of complaints or levels of annoyance) if this option were taken? Please provide details.

No, but if the Code were removed mobile vendors could be more likely to face legal action by local authorities and/or local residents, and legal costs could rise for all concerned.

Q4C. Do you have any data on the potential benefits to mobile vendors, local authorities or local residents (e.g. in terms of sales generated) if this option were taken? Please provide details.

No. There would be likely to be a net disbenefit to local authorities or residents, rather than any benefit. It is also highly possible that there would be no net benefit to mobile vendors, as they could face more uncertainty and more challenges to their operations.

Q5. Do you support the proposed changes to the text on taking noise measurements? Why/why not?

Yes, with the correction of 'confirms' to 'conforms' in line 2, because this represents sensible, technical updating.

Q6. Prior to this consultation, did you know that there was a Code of Practice on Noise from Ice-Cream Van Chimes, etc, 1982.

Yes.

Q7. Prior to this consultation, did you think the Code needed changing?

No.

Q8. Prior to this consultation, had you experienced noise as a result of chiming? (This could be personal experience, or witnessed as part of your role as environmental health practitioner, for example.) Please provide details.

Yes, this issue is raised with NAS through its National Noise Helpline and other channels. Details of complaints to NAS are included in the Appendix.

Q9. Which of the four options above would you favour? Why?

Option 1, keep the Code as it is (with minimal technical updating). Ideally, NAS would prefer chiming to cease entirely, as an intrusive selling technique which is

outmoded and unnecessary in an age when there are better ways of communicating and more ways of supplying perishable foodstuffs. If this is not possible, the balance between differing interests represented by the Code is one that has broadly stood the test of time. If some mobile vendors believe they will sell more goods by annoying more people, they are almost certainly mistaken.

Q10. Do you have any additional evidence to support or refute any of the options? Please provide details.

NAS has cited such evidence under responses to previous questions. It is regrettable that Defra's consultation did not include a review of relevant psychoacoustic research, or refer to the health disbenefits and costs to the NHS of any increased promotion of ice cream and other foods already contributing to the obesity epidemic.

The impact assessment includes unrealistic assumptions for which no evidence is offered, e.g. that all mobile vendors would follow a non-statutory industry-led code (page 6). In the last paragraph on page 10, it is wrong to equate the cost of a complaint to a resident with the time taken to make it. The latter is, of course, only a minimum cost (i.e. the overall disbenefit is higher, or the complaint would not have been made). Some text within the last paragraph on page 10 of the IA appears displaced.

Ends