

Minister van Infrastructuur en Waterstaat  
p/a Bureau Sanering Verkeerslawaaai  
Postbus 97  
3440 AB Woerden

Eindhoven, May 15, 2022

**Subject: View on intended changes to noise production ceilings for A2/A67 Randweg Eindhoven**

Dear Sir, Madam,

I would like to respond to the draft decision (in Dutch: ontwerpbesluit) of April 5, 2022 with reference lenW/BSK-2022/71851. In this draft decision, the Minister of Infrastructure and Water Management announces the intention to amend the noise production ceilings (GPPs) at 267 reference points located along the A2 between km 158.8 and km 169.7 and along the A67 between km 16.6 and km 19.2, with application of Article 11.28, paragraph 1, of the Environmental Management Act.

The reason for the intended amendment of the GPPs are the results of the compliance report for the year 2016. These show that the GPPs at the level of the above road sections are in danger of being exceeded or have already been exceeded. According to the draft decision, this (imminent) exceedance is caused by the fact that traffic intensities have increased since 2008.

According to the underlying acoustic study, the (future) exceeding of the GPPs cannot be removed with effective noise measures. Therefore, the draft decision proposes to increase the GPPs along the above road sections at 100 reference points. According to the acoustic study, an increase in the current GPPs will lead to an increase in the noise standard for 193 homes. One of these 193 homes concerns my home. This is reason for me to react to the draft decision.

Below I will discuss two aspects: (1) the starting points of the draft decision and the acoustic study and (2) the effectiveness of the noise measures.

***Starting points***

The draft decision takes the compliance report for the year 2016 and the noise register of December 20, 2019 as its starting point. However, since then there have been developments that may affect the noise levels for the reference year 2040. For example, the maximum speed on the A2 and A67 on the above road sections has been reduced from 120 to 100 km per hour from 6 am to 7 pm since March 2020. In addition, since the corona crisis, many companies are putting a lot of effort into working from home and the Rutte IV cabinet intends to introduce a mileage charge by 2030 at the latest. All this may have a significant effect on noise levels in the year 2040, to such an extent that the current GPPs along the A2/A67 and noise standards at the level of the homes in question may possibly remain unchanged or may even be lowered.

The draft decision and the acoustic study (which was published to a limited extent) do not sufficiently show the extent to which these developments were taken into account when calculating the noise levels. I request you to include these and possibly other developments in the calculations of the noise levels for the reference year 2040 and to adjust the decision accordingly. I also request that you make the complete noise study public.

***Effectiveness of the noise measures***

In the presentation of the acoustic study (<https://tinyurl.com/a2strijp>) it is stated that the pavement on the road sections in the study area already consists of the quietest type applied on national roads and that the study therefore focused on the implementation of additional screening measures. Based on the results, the presentation concludes that additional screening measures are not effective and 'therefore' a procedure must be started to increase the GPPs along the A2/A67 and the noise standards at the homes in question.

In my opinion, this conclusion is too simplistic. If calculations show that the legal noise standards are exceeded, then the problem should preferably be tackled at the source. The study completely ignores two alternative possibilities for tackling noise production at the source, namely (1) reducing the (growth in) traffic intensity and (2) reducing the maximum speed. With respect to the first point, I refer to the already mentioned developments regarding working from home and the introduction of mileage charge. With regard to the second point, I note that a maximum speed of 120 km per hour in the evening and night (7 pm to 6 am) applies to the relevant road sections of the A2 and A67. As an effective noise measure, the introduction of a permanent maximum speed limit of 100 km per hour on both road sections could be considered. Such a permanent speed limit of 100 km per hour has already been implemented on the A2 near 's-Hertogenbosch.

I request that you further investigate the effectiveness of reducing noise at the source by reducing the (growth in) traffic intensity and lowering the current maximum speed limit, and that you adapt the decision accordingly, insofar as an effectiveness analysis based on the possibly adjusted starting points is still necessary. I would also ask you to clarify why additional screening measures are not effective.

Kind regards,

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*Please include your name, address, city, telephone number and e-mail address above. Sign the letter and send it, preferably by registered mail, to the address at the top of this letter. Please do so no later than Wednesday, May 18.*

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