

Dear Arleta

Planning Application Reference: APP/25/00162

Description: **Flood and coastal erosion risk management scheme comprising a combination of raised earth embankments, raised footpaths/cycleways, sheet piled sea/flood defence walls with** cladding and flood glass, provision of flood gates, associated landscaping and landscaping improvements (including street furniture), tree works and tree removals, realigned sections of cycleway/walkway, highway alterations and improvements, ecological improvements and temporary compounds and access, and all associated works. The proposal constitutes EIA development.

Location: Land and coast adjacent to, Langstone Road, Havant

Thank you for consulting Environmental Health (Pollution) on the above application. The following documents have been reviewed:

- Planning, Design and Access Statement (Feb 2025)
- Environmental Statement (ES) – Chapter 14 Noise & Vibration (Jan 2025)
- Appendix O – Construction Noise Assessment (AECOM, Jan 2024)
- Outline Construction Environmental Management Plan (CEMP) (Feb 2025)

Noise

The Construction Noise Assessment adopts the BS 5228-1:2009+A1:2014 ABC methodology to determine significant effects. Long-term unattended monitoring undertaken over 12 days demonstrates reliable baseline data. Based on measured ambient conditions, the assessment identifies a 65 dB LAeq,12hr threshold for significant daytime noise impacts across all frontages (07:00–19:00).

The modelling results in the ES and Appendix O show that:

- All frontages (1A - 5) are predicted to experience exceedances of the 65 dB threshold during key construction activities.
- Percussive piling results in the greatest impact, particularly at Frontage 4, with the ES identifying 24 dwellings potentially exposed to significant noise levels for around 20 days during piling operations.
- Construction hours are nominally 07:00–19:00, but due to tidal constraints, evening and night-time working is anticipated, which will increase the number of affected receptors and severity of impacts.

The contour maps in Appendix O show numerous properties falling within the daytime, evening, and night-time impact zones for multiple plant items, including excavators, dump trucks, rollers, and piling rigs.

Although the applicant commits to a Section 61 application for out-of-hours work and to providing a final CEMP with more detailed mitigation once the principal contractor is appointed, the ES currently does not quantify the total number of days individual dwellings will exceed the 65 dB threshold for all phases of the scheme. Given the multi-year construction period and its proximity to sensitive residential areas, this information is essential for assessing the severity and duration of cumulative impacts.

Given the scale and duration of predicted exceedances, particularly from percussive piling, there is a reasonable likelihood that some residents may require temporary noise insulation measures or, in more severe cases, temporary rehousing, consistent with BS 5228-1 Annex E.4 provisions for “prolonged significant adverse effects”.

The final CEMP must include:

- A detailed dwelling-by-dwelling assessment identifying properties likely to exceed the relevant BS 5228 thresholds, including duration and timing (day/evening/night).
- Eligibility criteria for noise insulation or temporary rehousing, aligned with BS 5228-1 Annex E.4.
- A standalone Noise & Vibration Management Plan, including:
 - Construction phasing and predicted noise levels per activity
 - A programme showing avoidance of high-impact works during sensitive hours
 - A protocol for communicating with affected residents
 - On-site noise monitoring strategy and trigger response actions

Vibration

Appendix O identifies that at several locations (e.g., 3 - 7 m from the sheet piled wall), vibration may exceed 10 mm/s PPV, the level at which human annoyance becomes likely and exposure may be intolerable according to BS 5228-2.

The ES acknowledges that the 10 mm/s limit may not be achievable using vibratory or percussive piling at these distances. The Outline CEMP proposes hydraulic press-in piling “where practicable”, but this caveat may leave residents exposed to unacceptable vibration levels if ground conditions preclude its use.

A pre-condition building condition survey is proposed, but the applicant must also address residential amenity impacts.

The final CEMP must include:

- Commitment to hydraulic press-in piling as the default method within 10 m of any dwelling, unless demonstrated unfeasible through site investigation.
- A Vibration Management Strategy, including:
 - Real-time vibration monitoring at agreed receptor locations
 - Site-specific thresholds and stop-work triggers
 - Procedures for temporary rehousing where PPV levels exceeding 10 mm/s are unavoidable
 - Commitment to remediate any building damage attributable to construction vibration.

Construction Hours

Good practice includes that noisy construction works should not commence before 8am. It is therefore requested that the final CEMP includes that noisy works shall only

take place between 08:00 - 18:00 Monday to Friday, 08:00 - 13:00 on Saturdays and not at all on Sundays or Public Holidays, unless otherwise approved by the Local Planning Authority or secured by section 61 agreement.

Dust / Air Quality

Although the Outline CEMP lists general dust suppression measures, these remain generic and do not meet the expectations of IAQM “Guidance on the Assessment of Dust from Demolition and Construction (v2.2, 2024)”.

A site-specific Dust Management Plan (DMP) has not been provided.

A DMP must be submitted prior to commencement and must:

- Follow the IAQM 2024 methodology, including:
 - A quantitative dust risk assessment
 - Identification of receptor sensitivity
 - Assignment of site-specific mitigation
- Include all Highly Recommended (HR) IAQM measures, plus additional measures where risk is “High”

Environmental Health has significant concerns regarding the level and duration of noise and vibration impacts on nearby residents. The documents provided acknowledge major exceedances but defer key mitigation details to the final CEMP and Section 61 process. To ensure the development is acceptable and impacts are minimised, the following must be secured by pre-commencement planning condition:

Recommended Conditions

Construction Environmental Management Plan (CEMP)

No development (including demolition) shall take place until a Construction Environmental Management Plan has been submitted to, and approved in writing by, the local planning authority. Thereafter all works shall be carried out in accordance with the approved Statement throughout the construction period. The Statement shall provide for:

1. Development contacts, roles and responsibilities
2. An indicative programme for carrying out of the works
3. the parking of vehicles of site operatives and visitors
4. a public communication strategy, including a complaints procedure
5. loading and unloading of plant and materials
6. storage of plant and materials used in constructing the development
7. the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate
8. wheel washing facilities
9. measures to control the emission of dust and dirt during construction
10. measures to control noise and vibration during construction
11. a scheme for recycling/disposing of waste resulting from demolition and construction works

Reason: To protect the amenity of residents living in the vicinity of the site

Noise and Vibration Management Plan (NVMP)

Prior to commencement of any construction works, a detailed **Noise and Vibration Management Plan (NVMP)** shall be submitted to and approved in writing by the LPA.

The NVMP shall include:

Noise

Dwelling-by-dwelling impact assessment identifying all properties predicted to exceed BS 5228-1 ABC threshold values for day, evening and night-time periods, including the duration and frequency of exceedances.

1. A schedule of works requiring noise insulation or temporary rehousing, prepared in accordance with BS 5228-1 Annex E.4.
2. Detailed mitigation measures, including:
 - Choice and sequencing of plant
 - Use of acoustic screening/barriers
 - Temporary noise insulation measures
 - Restrictions on piling and high-impact activities
3. A noise monitoring scheme including monitoring locations, frequency, thresholds and stop-work actions.
4. A Section 61 Prior Consent Strategy, setting out all works anticipated to require consent under the Control of Pollution Act 1974.

Vibration

1. Identification of dwellings within 10 m of piling or other vibration-generating activities.
2. A method selection hierarchy, requiring hydraulic press-in piling as the default method within 10 m of any dwelling unless site investigation demonstrates it is not practicable.
3. A Vibration Risk Assessment addressing predicted PPV levels against BS 5228-2 thresholds.
4. Real-time vibration monitoring with clear trigger levels, including immediate stop-work procedures.
5. A building condition survey scheme, including pre- and post-construction inspection and arrangements for the remediation of any damage attributable to the works.
6. A protocol for temporary rehousing where PPV >10 mm/s is unavoidable.

The development shall be carried out strictly in accordance with the approved NVMP.

Reason:

To ensure noise and vibration impacts are minimised and controlled, and to protect the health and amenity of residents and sensitive receptors.

Dust Management Plan

Prior to the commencement of development, a site-specific Dust Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The

scheme shall be produced in accordance with the Institute of Air Quality Management (IAQM) 'Guidance on the assessment of dust from demolition and construction' (2014) and be implemented, maintained and retained for the duration of the development.

Reason: To prevent loss of amenity and protect local air quality in accordance with IAQM best practice

Boundary Hoarding

Prior to commencement of works at any frontage, details of boundary hoarding shall be submitted for approval to the local planning authority. The hoarding shall be constructed from solid, imperforate panels with a minimum mass of 10 kg/m². The edges and joints between panels will be sealed to ensure full acoustic integrity. Details must include

- Plans and elevations identifying the location, height and extent of acoustic screening or hoarding for each frontage phase;
- Material specifications, including the minimum mass per unit area;
- Construction details demonstrating the sealing of all gaps, joints, and edges to maintain acoustic integrity;
- Details of fixings, supports, and installation methods;
- A method statement for installation, inspection, maintenance and retention for the duration of works within that frontage phase.

The approved acoustic screening or hoarding shall be installed in full prior to commencement of construction activities within the relevant frontage phase and shall be retained, maintained and kept in effective condition for the duration of works in that phase unless otherwise agreed in writing by the LPA.

Kind regards,

Craig Milligan

Environmental Health Officer

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