

From: Craig Milligan

Sent: 06 December 2025 11:41

To: Eaves, David

Subject: Ref: PR202511-106564 (APP/21/01434) Rook Farm, land off St Marys Road, Hayling Island

Dear David,

Thank you for consulting Environmental Health (pollution) regarding the above outline application. The following comments have regard to noise, construction impacts and external lighting.

Comments regarding Air Quality and Contaminated Land shall be submitted separately.

The submitted *Wardell Armstrong Noise Assessment Report (Ref: GM13225, April 2024)* has been reviewed.

While the report provides some useful baseline information, the environmental survey data is dated and there are concerns regarding the robustness of the BS 4142 assessments.

Specifically, the BS4142 assessments omits likely acoustic feature penalties as no tonality correction was applied to the electricity substation (which typically emits a tonal hum around 50 Hz), and no character penalty was applied to plant noise at Smith & Austin Engineering Products Ltd despite paragraph 4.7.24 acknowledging that the noise is of a different and noticeable character.

In addition, paragraph 4.7.20 incorrectly states that the impact would be lower when residual sound levels are low, whereas BS 4142 guidance indicates the opposite, that impact is greater when residual sound levels are low due to reduced masking.

Despite these shortcomings, I am satisfied that acceptable internal and external noise levels can be achieved at the proposed development site, provided appropriate mitigation measures are incorporated into the detailed design. To avoid imposing unnecessary or onerous requirements at this outline stage, these matters should be addressed through conditions requiring a comprehensive ProPG: Planning & Noise (2017) assessment and associated mitigation strategy at the reserved matters stage, supported by post-completion validation.

The ProPG assessment should include further environmental noise measurements to demonstrate current representative day and night-time conditions, including weekdays and weekends, as reliance on 2016 background data introduces uncertainty and does not reflect current conditions.

The following conditions are recommended, should permission be granted.

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

Notes

- The CEMP should include that no burning of waste materials shall take place on site.

- The Dust control element of the CEMP should include a site-specific dust management plan resulting from a risk assessment as detailed in IAQM document '*Guidance on the assessment of dust from demolition and construction, 2024*'

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

Construction Hours

Construction of the development including site traffic and deliveries shall only be carried out between 8:00 am and 6:00 pm Mondays to Fridays and 8:00 am and 1:00 pm on Saturdays and at no time on Sundays and Public Holidays

Reason: To ensure that the amenities of the area are not detrimentally affected by the construction of the site outside reasonable working times

External Lighting

No external lighting shall be installed until details have been submitted to and approved in writing by the Local Planning Authority, prior to the commencement of the development. This submission shall include a layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles). The approved scheme shall be installed, maintained, and operated in accordance with the approved details unless the Local Planning Authority gives its written consent to the variation.

Reason: To protect residents from light pollution.

It is expected that external lighting shall be designed and installed in accordance with ILP Guidance Note 1 for the reduction of obtrusive light, 2021.

Noise – ProPG Stage 2 Assessment and Validation (Reserved Matters)

(a) Prior to the approval of any reserved matters application that includes layout and/or landscaping, a full ProPG 2017 assessment shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall:

- Provide further environmental noise survey to cover day and night time periods and to include weekdays and weekends.
- Be prepared in accordance with ProPG: Planning & Noise (2017) (including the four key elements of Stage 2);
- Ensure that internal and external noise levels for the proposed residential accommodation comply with the guideline values stated in BS 8233:2014 and ProPG;
- Demonstrate that the noise rating from any commercial or industrial source does not exceed the typical background noise level at the boundary of any approved residential premises, or is otherwise shown to result in a low impact in accordance with BS 4142:2014+A1:2019.

The approved scheme shall be implemented in full prior to occupation of any dwelling and shall be maintained and retained thereafter.

(b) Validation Requirement:

Prior to the occupation of any dwelling, a post-completion acoustic validation report shall be submitted to and approved by the Local Planning Authority. The report shall:

- Demonstrate compliance with the internal and external noise criteria set out above;
- Include testing with windows open for ventilation unless mechanical ventilation has been provided, in which case tests shall be performed with such mechanical ventilation operating;
- Confirm that all approved noise protection measures have been installed and are functioning as intended.

Any non-compliance shall be accompanied by remedial measures and a timetable for implementation, to be approved by the Local Planning Authority and completed prior to further occupation.

Reason: To ensure good acoustic design and protect residential amenity in accordance with ProPG, BS 8233, and BS 4142.

Kind regards

Craig Milligan

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