

Mr Richard Allen Lead Member of the Examining Authority

## Daniel Douglas Team Leader Transport Planning Planning

London Borough of Havering Mercury House Mercury Gardens Romford RM1 3SL



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Dear Sir,

London Borough of Havering (20025659) – Responses to Environment Statement Chapter 6 Noise and Vibration (REP5-014), associated Appendices (REP5-024, and REP5-025), and outline CEMP (REP5-027)

Thank you for the opportunity to comment on the Environment Statement Chapter 6 Noise and Vibration (REP5-014), associated Appendices (REP5-024, and REP5-025) and outline CEMP (REP5-027). LB Havering has reviewed the documentation and would like to offer the following comments:

#### 6.1 Environmental Statement Chapter 6: Noise and vibration (REP5-014)

Paragraph 6.6.1 – LB Havering would suggest that it should be stated that work between 23:00 and 07:00 (overnight) will be accompanied by a relevant S61 agreement for the duration of the works, with the Local Planning Authority.

LB Havering would suggest that the Applicant should consider the language used in paragraphs 6.8.14 and 6.9.11 to ensure there is consistency across Chapter 6 of the Environment Statement, the Register of Environmental Actions and Commitments (REP5-028) and Appendix F of the outline Dust, Noise and Nuisance Management Plan (DNNMP) (REP5-027).

Paragraph 6.8.14 States: 'To avoid any perceptible vibration from ground compaction at Grove Farm, no vibratory rolling within 20 m is recommended as outlined in section 6.9.11'.

6.9.11 States: 'Dead rolling is recommended for all ground compaction works within 20 m of the receptors to avoid perceptible vibration, particularly adjacent to Grove Farm'.

Paragraph 2.5.2 of the DNNMP states. 'Piling will be carried out with the method that minimises both noise and the transmission of vibration to sensitive receptors'.

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Furthermore Table 1.1 of the REAC (Ref NV0.1) states: 'Vibratory rolling to be avoided within 20m of Grove Farm'.

LB Havering would suggest that the wording must be clearer for the compaction works within 20m of Grove Farm. Ground compaction works within 20m of Grove Farm will use Dead Rolling methods only, to minimise noise and vibration affecting the residents of Grove Farm.

LB Havering would suggest that the following bullet points can be added to paragraph 6.9.8:

- All plant within the compound should have white noise reversing warning alarms as opposed to the 'beeper' type.
- Compound layouts should be used to screen static plant e.g. diesel generators and storage areas from the nearest noise sensitive receptors.

Paragraph 6.9.10 – The inclusion of a temporary noise barrier at Putwell Bridge Caravan Park is welcome.

Paragraph 6.10.13 – LB Havering would suggest that any major construction works within 20m of Grove Farm should be accompanied with a relevant S61 agreement to minimise impact from noise and vibration.

Table 6.20 - LB Havering would recommend that long-term continuous noise and vibration monitoring is undertaken at Grove Farm throughout the construction phase of the project.

LB Havering would recommend that short-term manned noise monitoring should be scheduled for other receptors e.g. Maylands Cottages, Putwell Bridge, Gardens of Peace, 17 Colchester Road and 12 Craven Garden experiencing adverse impacts during the day.

LB Havering would suggest that S61 agreements should include monitoring details and that Havering should agree details prior to these works starting.

Paragraphs 6.5.15 - 6.5.19 – LB Havering would suggest that there should be a margin of error published for the noise model and some documented correlation between the noise model and published levels or the baseline measurements.

### 6.3 Environmental Statement Appendix 6.3: Noise sensitive receptors (REP5-024)

The noise model uses the correct standards but there appears to be receptor noise level discrepancies between the baseline measured, and DEFRA and noise model predicted levels. Clarification on this point has previously been requested at a meeting between LB Havering and the Applicant.

## **Environmental Statement Appendix 6.4: Noise nuisance (REP5-025)**

LB Havering is satisfied that the correct methodology from DRMB Table A1.3 has been used for the assessment of noise nuisance from the Scheme.

The assessment of noise nuisance is not to be confused with nuisance in Statutory documents e.g Environmental Protection Act 1990. This use of nuisance is an estimation

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of the perception of traffic noise based upon research and previous data. It therefore does not necessarily reflect the exact situation 'on the ground' for receptors surrounding this scheme.

LB Havering would suggest that an explanatory note should follow 6.1.1 of Appendix 6.4 stating this measure is a perception of road traffic nuisance and not based upon comparison against numerical values. The same explanatory note should be added after 6.5.15 in the 6.1 Environmental Statement Chapter 6: Noise and Vibration.

# Appendix F: Outline Dust Noise and Nuisance Management Plan (DNNMP) (REP5-027)

LB Havering welcomes the Dust Risk Assessment that has been added to the DNNMP.

Concerning Table 3.2, Havering is of the view that there is insufficient clarity on the specific mitigation measures which are only stated as "likely" measures, and do not appear to be linked to the risk assessment. Havering is concerned that the monitoring of effectiveness of these measures is left to the principal contractor.

Yours faithfully,

Daniel Douglas, **Team Leader Transport Planning**