

Email Note

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Company:	PDE Consulting Ltd	Date:	08 July 2026
Email:	suzanne@pdeconsulting.co.uk	Ref:	5413
Copies to:	-	Page:	1 of 2
Subject:	EPR/LP3527SC/A001 - Land at Neilson Rail Sidings, Wellingborough, NN8 4BH Noise Impact Assessment		

Dear Suzanne,

Further to your recent correspondence with the Environment Agency (EA) with regards to the Conway Eurovia Industries Ltd site at Neilson Rail Sidings, Wellingborough I have drafted this brief response with regards to the comments on background sound levels.

The requirement for additional background sound levels is not considered to be necessary and the reasoning provided by the EA is imprecise. I have set out a brief response to each comment provided by the EA on background sound levels below.

1. *"the unattended survey was cut short due to equipment being damaged, the useable data from the survey does not cover the likely worst-case operational time periods i.e. not weekend night-time."*

WBM understand that the EA permit application is only for crushing and screening of road planings in the building on site. The permitted hours of operation for recycling of road planings is 07:00 to 17:00 Monday to Friday, Saturdays, Sundays and Bank Holidays. This is confirmed in Condition 4 of the planning permission for the site. As such the operations covered by the EA permit do not cover weekend night-time and the requirement for additional background sound level data during such periods is therefore unjustified.

2. *"the unattended survey was carried out on the site and so is not representative of all noise sensitive receptors...."*

In addition to a sound level meter installed on site, sample measurements were obtained at locations representative of the nearest residential receptors to the site. This included 19 sample measurements across two separate days and covering a range of weather conditions. With the exception of dwellings located on busy main roads, i.e. Location C "The Hollies" and Location D "Finedon Hill Farm" the representative background sound levels were relatively comparable across the survey area, with representative background sound levels ranging from 43dB $L_{A90,T}$ to 47dB $L_{A90,T}$. The surveys did not therefore indicate great variation in background sound level data that would warrant additional work. This is as expected in an area where background sound levels are largely controlled by distant road traffic noise.

3. *"Also, the survey was carried out in 2023 and the area has changed significantly in this time."*

A review of the locality using aerial imagery (Google Maps) does not show any significant changes to the nearest residential receptors to the site or their immediate surroundings that is likely to influence background sound levels. It is unclear what the EA comment is referring to specifically and whether this comment relates to one receiver location or all. The only obvious change is an increase in the finished housing within the Stanton Cross development. However, this area was covered by survey work at the time. Aerial imagery shows completed housing slightly closer to the site than that

surveyed in 2023, but these houses are also closer to Finedon Road and this could be expected to result in slightly higher background sound levels.

4. *“Additional evidence is required to confirm that the background sound levels used in the assessment are representative.”*

It is not clear whether this is a general comment, i.e. that the EA is requesting further samples to be taken during daytime hours, and if so, why this is necessary given the comments in bullet point 2 above.

5. *“The consultant should ensure their updated survey includes the most sensitive operational times at positions representative of the noise sensitive receptors without influence from any existing site or construction noise.”*

As noted in bullet point 1 above, the activities subject to the EA permit do not occur during evening and night-time and as such additional background sound levels for these periods should not be required. Daytime periods have been covered in the existing assessment.

The comments provided by the EA in all cases are not justified and lack clarity. Should further background sound levels be required by the EA any response should be clear on:

- What additional receptors / areas should be covered by the survey (given that the nearest receptors were included in survey work at the time).
- The additional times periods that should be covered by any survey work and a justification for this.
- Where additional samples are requested for time periods already covered by survey work, what additional work would be considered sufficient, e.g. whether one or two additional days of sample measurements would be adequate.

It should also be noted that the timescale stipulated for the acquisition, analysis and presentation of survey results is unreasonable as survey work is weather dependent in order to be considered reliable.

Sarah Large
Senior Consultant

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