Appendix 11.4: Site Suitability

Proposed Sensitive Receptors

The proposed development will include noise-sensitive receptors in the form of residential dwellings.

Existing Soundscape

The existing soundscape across the site can be characterised as being dominated by local and distant road traffic. There were no other sources of environmental noise noted that were more dominant. The western extents next to Cefn Road were observed to receive the highest sound levels in comparison to the rest of the site due to local road traffic. The northern, southern, central and eastern areas were observed to be predominantly quiet in character. Further potential noise sources for consideration include the Wrexham Container Storage and the Wrexham Rugby Club pitch and clubhouse. Wrexham Container Storage (a self-storage business) that is understood to permit 24/7 access is located south of the site. The Wrexham Rugby Club is located to the north of the site off Bryn Estyn Road

Noise Surveys

Noise surveys were undertaken in 2022 and more recently in 2024. The procedures and results of these noise surveys are presented in Appendix 11.3.

Impact of Existing Noise Sources on the Development

Road Traffic Noise

Technical Advice Note 11: Noise

Table 11.4.1 below provides an assessment of noise across the Proposed Development at selected noise sensitive receptors against TAN11 categories using the survey data presented in Appendix 11.3.

Table 11.4.1: TAN 11 Assessment

Measurement Location	Daytime $L_{Aeq,T}$ dB	Daytime NEC Category (road traffic sources)	Night-time $L_{Aeq,T}$ dB	Night-time NEC Category (road traffic sources)
MP1	52.6	A	51.3	B
MP2	48.5	A	-	-
MP3	43.0	A	-	-
MP4	43.4	A	-	-
MP5	41.6	A	-	-
MP6	38.6	A	-	-
MP7	41.3	A	-	-
MP9*	61.7	B	55.4	B
MP10	45.8	A	41.3	A

*2024 MP9 data is based on full $L_{Aeq16hour}$ daytime and $L_{Aeq,8hour}$ night-time roadside measurements and so supersedes the previous MP8 data as 2022 Survey MP8 results was based on a 15-minute spot measurement during morning rush hour. Worst-case day and night-time $L_{Aeq,T}$ from across weekday and weekend measurements are presented.

Based on the comparison with the TAN 11 criteria for the daytime, the majority of the site falls within NEC A, with a small area around MP9 (to the southwest of site) falling into NEC B.

For the night-time, areas of the site close to MP1 and MP9 fall into NEC B. It should however be noted that the NECs at MP1 and 9 are based on roadside measurements and do not reflect that the vast majority of the remainder of the site that falls into a lower NEC.

In terms of site suitability, in the worst case of the outer edges of the site closest to Cefn Road, TAN 11 states that NEC B indicates that, “Noise should be taken into account when determining planning applications and, where appropriate, conditions imposed to ensure an adequate level of protection.” It can therefore be concluded that in terms of the worst-case road noise, the site is suitable for residential development provided a suitably worded condition which outlines the requirement for consideration of road noise on residential properties with a view of Cefn Road be implemented.

Wrexham Container Storage Noise

No activity was observed at the container storage premises during any of the 2022 and 2024 surveys, and noise associated with the containers is unlikely to be significant.

Wrexham Rugby Club Noise

Wrexham Rugby Club was not observed to be holding any events or rugby matches during either the 2022 or 2024 site visits, however, it is reasonable to assume that practice sessions and rugby matches will occur on the rugby pitch during daytime hours.

We are informed by our client that the Chairman of Wrexham Rugby Club has stated that on average, across the year, there is one evening event and one weekend daytime event each month. Private functions (e.g. bingo nights, christenings, birthday parties etc..) in the clubhouse are mostly bookings by club members but aren't restrictive and the club organises member functions e.g. presentation nights.

The license for the clubhouse allows for live music and recorded music from 10:00 – 24:00 hours Sunday to Thursday and 10:00 – 00:30 hours Friday and Saturday, Thursdays and Mondays of bank holiday weekends and Christmas Eve. On New Year's Eve this extends to 10:00 – 02:00.

Based on the available strategic masterplan at the time of undertaking this assessment, the existing clubhouse proper is located approximately 75 m to the north of the closest proposed residential parcel, and the nearest edge of the rugby pitch is located approximately 30 m to the north of the closet proposed residential parcel.

Noise generated by Wrexham Rugby Club may therefore require consideration. Examples of feasible mitigation measures that may suitably attenuate noise from the rugby club include but are not limited to; consideration for dwelling and garden orientations, effective acoustic barriers around gardens and the northern boundary of the site, and enhanced glazing and ventilation specifications. A full assessment of the potential impact of noise from the Rugby Club can be undertaken at the reserved matters stage to provide quantifiable mitigation requirements, and this can be secured by an appropriate planning condition.

Pre-application feedback

A pre-planning consultation was undertaken with WCBC, who offered the following feedback1 regarding a previous version of a standalone noise assessment report for the site[2]:

1) *Part of the site has been identified as falling within NEC B of TAN 11. Noise mitigation will therefore be required for houses in this area so as to achieve the internal levels as described in BS8233 and the WHO guidelines. A scheme to limit the sound pressure levels in the external amenity areas to 50 dB LAeq should also be included during the design phase, which I note there is a proposed mitigation in the acoustic report for. Should this be the preferred method of mitigation confirmation will be required it can achieve the desired sound pressure levels.*
2) *The noise report has identified the rugby club as a potential noise source that requires further consideration. A robust consideration of this should be included along with any suitable mitigation scheme so as to achieve the limits as discussed in point 1 above. It is advised to take into account the provisions of any premises licence that the club may hold.*
3) [Not applicable][3]

[1] Email from Paul Campini of WCBC to Justin Paul of J10 Planning, dated 02 May 2024.

[2] Miller Goodall Limited - Noise Assessment – Cefn Park, Wrexham - NA_102716-2_V2

[3] Reference to a wastewater treatment works (WwTW) is not applicable. Reference to a WwTW was an error in a previous version of the standalone noise assessment to which this pre-app advice relates.

4) [Not applicable][4]

5) *The statements in the report relating to MP8 & 9 are accepted though confirmation should be provided that the identified commercial premises in the vicinity of MP9 has ceased trading or noise from activities from this site will need incorporating into the report along with suitable mitigation.*

6) *For construction activities I will be recommending a construction hours noise condition of:*

> *All works in relation to the implementation of this permission, including deliveries to and /or leaving the site, should be undertaken only between the hours of 07.30 to 18.00 Monday to Friday, 08.00 to 14.00 on a Saturday, and at no time on a Sunday or a Bank Holiday. Outside these times, any works which are audible beyond the site boundary have the potential to cause unreasonable disturbance to neighbouring premises.*
>
> *The applicant is advised that the Council has the option to control construction noise by serving a Control of Pollution Act 1974, Section 60 Notice where deemed necessary, and failure to comply with such a Notice can result in prosecution.*
>
> *The applicant is further advised that any complaints received relating to noise of any type from the development may also be investigated using the Council's Standardised Procedure for Dealing with Noise Nuisance Complaints. This is done under the Statutory Nuisance provisions provided within the Environmental Protection Act 1990, and legal action may be taken where appropriate.*
>
> *The applicant must adhere to the times given above wherever possible. If, however, there are urgent or unavoidable circumstances requiring work outside of the specified times, permission to proceed may be sought by contacting Environmental Health & Housing Standards at healthandhousing@wrexham.gov.uk or 01978 292040. Please use the same contact details for any other enquiries regarding construction / demolition site noise.*

7) *If piling is required for any part of the construction, it is advised that the LPA be contacted prior to commencing this so as to agree a suitable scheme.*

The feedback has been considered, and we offer the following responses to the above items:

1) Regarding road traffic noise impacting proposed residential parcels identified as falling into the NEC B category of TAN 11. This is an outline application. The report indicates that the proposed dwellings can meet the proposed criteria. However, as the layout is not yet fixed, this matter will be dealt with in detail at the reserved matters stage, once the exact position and orientation of each plot is established.

2) Regarding the potential noise impact of Wrexham Rugby Club on proposed residential parcels. This is an outline application. The position, orientation and design of dwellings adjacent to the rugby club is not yet fixed. A robust consideration of this potential noise source will be provided at the reserved matters stage. This will inform the mitigation to be provided to any nearby noise sensitive receptor, including the location and orientation of dwellings.

3) Not applicable.

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[4] Reference to a primary school is not applicable. Reference to a primary school related to a previous masterplan, which has now been superseded.

4) Not applicable.

5) Regarding commercial premises in the vicinity of MP9. This is an outline application; the position, orientation and design of dwellings in the vicinity of MP9 is not yet fixed. A detailed assessment of noise from any commercial/industrial noise sources in the vicinity of MP9 will be completed at the reserved matters stage.

6) No response. This is considered to be typical construction practice.

7) No response. This is considered to be typical construction practice.

Conclusion

As the predominant source of noise at the proposed development site is local and distant road traffic, the main indicator of site suitability for residential development is the TAN 11 Noise Exposure Categories. The majority of the site will fall under NEC A with only the areas closest to Cefn Road falling under NEC B. A suitably worded planning condition requiring an assessment of the impact of road traffic noise from Cefn Road at the proposed dwellings and recommendations for glazing and ventilation specification with suitable sound insulation performance to mitigate the road traffic noise to acceptable levels will provide an adequate level of protection.

Further noise sources that may impact upon the proposed development were identified as the Wrexham Container Storage premises to the south of the site, and the Wrexham Rugby Club to the north of the site. Noise from these sources is not considered a constraint to residential development at the site, as acceptable noise levels are capable of being achieved across the site by way of a combination of appropriate glazing, background ventilation and screening from layout and barriers where necessary.

Pre-application feedback from WCBC has been considered and responses have been set out. In summary, it is considered that the points raised can be dealt with at the reserved matters stage when further details of the proposed development have been designed and fixed. This can be secured by suitably worded planning conditions.