wrexham
COUNTY BOROUGH COUNCIL
CYNGOR BWRDEISTREF SIROL
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MEMORANDUM

From: **Ian Jones**
Head of Service Public Protection

To: **Matthew Phillips**
Head of Service Planning Development

Our Ref:

Your Ref: P/2025/0833

Date: 23-12-2025

Town and Country Planning Act 1990

Town and Country Planning (General Development Procedure) Order 1996

Re: P/2025/0833, ROXBURGH HOUSE, 12 HILL STREET, WREXHAM, LL11 1SN

Amended Plans - NEWID DEFNYDD AIL A THRYDYDD LLAWR YR ADEILAD O DDOSBARTH B1 (SWYDDFEYDD) I GREU 30 O FFLATIAU (DOSBARTH C3) GAN GYNNWYS CREU MANNAU PARCIO YCHWANEGOL, STORFA AR GYFER BINIAU, STORFA AR GYFER BEICIAU A DIHANGFEYDD / CHANGE OF USE OF SECOND AND THIRD FLOOR OF BUILDING FROM CLASS B1 (OFFICES) TO CREATE 30 NO APARTMENTS (CLASS C3) INCLUDING CREATION OF ADDITIONAL PARKING SPACES, BIN STORE, CYCLE STORAGE AND MEANS OF ESCAPE

RPT1 - REPORT REVIEW

Report 'M1 TRADE LIMITED, NOISE IMPACT ASSESSMENT REPORT, ROXBURGH HOUSE, 12 HILL STREET, WREXHAM LL11 1SN' Ref: P9413-R1-V1. Dated 09-12-25 by NoiseAir has considered the existing noise environment **

The results of the monitoring showing in Table 5 confirm that the noise level in front of the proposal, which is identified as from both road users and pedestrians is in Noise Exposure Category (NEC) C for daytime and at the upper limit of NEC C and into NEC D during the nighttime. Technical Advice Note (TAN) 11 describes these NEC's as:

NEC C: *Planning permission should not normally be granted. Where it is considered that permission should be given, for example, because there are no alternative quieter sites available, conditions should be imposed to ensure a commensurate level of protection against noise.*

NEC D: *Planning permission should normally be refused.*

The second monitoring location in the courtyard to rear of the proposal, which has been described as noise from various plants associated with the nearby commercial properties falls within NEC's A & B during the day and NEC B during the nighttime, which are described as:

NEC A: *Noise need not be considered as a determining factor in granting planning permission, although the noise level at the high end of the category should not be regarded as desirable.*

NEC B: *Noise should be taken into account when determining planning applications and, where appropriate, conditions imposed to ensure an adequate level of protection.*

Furthermore Table 6 has identified the highest noise level exceeded more than 10 times overnight. The value from the front of the proposal is quoted as 83.6 dBLAmax. TAN 11 has a further caveat for nighttime noise:

Night-time noise levels (2300-0700): sites where individual noise events regularly exceed 82dBLAmax (S time weighting) several times in any hour should be treated as being in NEC C, regardless of the LAeq,8H (except where the LAeq,8H already puts the site in NEC D).

The report has further considered the noise plant noise and correctly carried out a BS4142 assessment (Methods for rating and assessing industrial and commercial sound) and identified that the background noise level will be exceeded by 23 dB during the day and by 25 dB during the night. BS4142 defines a difference of +10dB *as likely to be an indication of a significant adverse impact, depending on the context;* which is also modelled to be the case for any deliveries in this are for the nearby commercial nits. result has also been

Given the daytime noise rating falls within NEC C and the nighttime noise rating is within NEC D this would suggest that this is not a suitable area for residential development. Which is further supported by several instances where the 82dB nighttime limit for individual noise events was also exceeded. Of further consideration is the noise levels from the plant and deliveries in the courtyard indicate the likelihood of significant adverse impact.

However, should Planning wish to give further consideration to this application the remainder of the report has been evaluated.

When evaluating the Nosie from the neighbouring licenced premiss the following comment was made in paragraph 4.4.3:

Given the nature / character of the noise source within the sports bar we recommend that noise transmission and associated noise break into habitable rooms within the proposed development does not exceed 25 dB(A) during the daytime.

This is discussed further in the report in section 7.3 which concludes with paragraph 7.3.4:

In order to improve the acoustic performance, we recommend that a detailed sound insulation design should be completed along with a sound insulation test once completed to confirm performance. It is recommended that at this stage this is secured by way of an appropriately worded condition.

This is worthy of further consideration, and I am in agreement that an assessment of noise break in from any neighbouring commercial unit in addition to any ground floor commercial unit be required from the applicant as discussed at the end of this response.

So as to achieve the internal sound levels required by BS 8233 (Guidance on sound insulation and noise reduction for buildings) the report has recommended a scheme of insulation in Section 7. However, further clarification of the below points should be sought from the applicant prior to this section being able to evaluate the proposal:

1) Table 10 identifies the worst case noise levels. The worst case nighttime level for the front on the proposal is quoted in table 7 as 69 dB, yet Table 5 that quotes the monitoring results shows this to be 72dB.

2) Tabel 10 identified the worst case noise level for the rear of the building at night to be 52dB yet tables 8 and 9 shows his to be 55dB

In both these cases a change of 3dB would be just about perceptible yet any attenuation should be designed to the actual noise environment.

Using the results from Tables 7 to 9 the proposed ventilation specification will not meet the noise levels stipulated in BS8233. Note, when compared to the noise levels as quoted in Table 10 the level for nighttime noise will still be exceeded by 5 dB. It is therefore inferred that this proposal is based on BS8233 stating that guidelines can be relaxed by 5 dB to allow a desirable development. It would be a matter for planning to decide whether this is a desirable development.

The report has also recommended acoustic ventilation in sensitive rooms (Bedrooms and living rooms).

As well as the clarification as to the results shown in Table 10 I recommend that a survey of the acoustic breakthrough be required from the applicant such as:

No part of the development shall commence until a scheme of noise insulation and attenuation measures between any floors and walls with neighbouring and ground floor commercial uses and the floors between residential uses, in compliance with Building Regulations Guidance: Part E - Resistance to the Passage of Sound, has been submitted to, and approved in writing by, the Local Planning Authority. The measures as are approved shall be fully implemented in strict accordance with the scheme prior to first occupation / use of the development and shall thereafter be permanently retained.

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Head of Service Public Protection