Minera Roof Trusses
Units 1-3 Five Crosses Industrial Estate,
Minera,
Wrexham
LL11 3RD

Friday, 06 February 2026

FAO: Mathew Philips, Head of Service Planning Development & Dafydd Thomas, Senior Planning Officer – Development Management
Re: Planning Application – Former Tomlinson's Dairy, Five Crosses Industrial Estate, Minera
Ref: P/2025/0690
Proposal: Change of Use from "Dairy Only" to B2 (General Industrial) and B8 (Storage & Distribution)

Response to WCBC Planning Memo Regarding Noise: Noise Statement (Desktop Assessment)

1. Introduction

This statement has been prepared on behalf of Minera Roof Trusses Ltd (MRT) to provide a proportionate assessment of potential noise impacts associated with the proposed change of use of the former Tomlinson's Dairy site. It responds to the request from WCBC Public Protection for a noise assessment in accordance with Technical Advice Note 11: Noise.

Given the nature of the proposed operations, the industrial setting, the historic use of the site, and the presence of existing physical noise mitigation measures, this statement demonstrates that the development will not generate any unacceptable noise impact on nearby sensitive receptors, and that a full acoustic survey is not warranted in this instance.

2. Site Context and Existing Environment

The site lies within the Five Crosses Industrial Estate in Minera, an established employment area served by the A525 Ruthin Road. Surrounding land uses are predominantly industrial, with a small number of residential properties located to the east / south-east and north-west.

The site was previously occupied by Tomlinson's Dairy, which operated 24 hours a day, 7 days a week. Historic planning and environmental records show that this operation involved substantial external plant and equipment, including three large chillers and compressors situated outside the main buildings, alongside tanker movements and regular HGV deliveries. Noise mitigation fencing exceeding 3m in height was installed by Tomlinson's along the eastern boundary to reduce impacts on nearby dwellings.

Since the closure of the dairy, the site has remained vacant. The baseline sound environment is therefore influenced by other estate users and passing traffic along the A525 and internal estate road network.

3. Existing Physical Noise Mitigation Measures

In addition to the established industrial context, the site benefits from multiple existing physical measures that reduce the potential for noise propagation beyond the site boundary. These are shown on the applicant plan titled:
"Site Layout Plan – Existing Noise Management".

Key existing measures include:

- **Acoustic boundary fence (south-east):** A large acoustic fence approximately 15ft (c. 4.6m) high is present to the south-east of the site screening Kalver's Farm. The road-facing side is lapped timber. This fence remains in place and provides significant screening for yard-level activity.

- **Landscaped bunding & buffer planting:** There are extensive landscaped bunding and buffer planting zones around the site perimeter, particularly to the west and northern aspects of the site, where the former dairy site sits approximately 15m–18m below the A525.

- **Former railway corridor screening (north-west boundary):** A former railway line runs along the rear of the north-west boundary and incorporates historic bunding and established planting/vegetation from when the line was constructed and operational. These features are still largely in place.

Commitments in relation to these measures are as follows:

- MRT / Tŷ Eco MMC Ltd will **maintain** the acoustic fence (repair/replace panels as necessary to preserve integrity and performance).
- MRT / Tŷ Eco will **supplement planting where practicable** to enhance the existing landscaped bunding and buffer planting zones.
- **No additional bund earthworks are proposed** (i.e., the existing bunds remain, but there is no intention to form new bunds or materially alter bund geometry).

4. Proposed Operations

The proposed occupiers, Minera Roof Trusses and its sister company Tŷ Eco, are both established timber engineering and manufacturing businesses operating from an adjacent site within the same industrial estate.
The development will enable the consolidation and expansion of these existing operations.

Key operational features are as follows:

- All fabrication and cutting of timber will take place within enclosed factory buildings, which are modern steel-framed units with insulated cladding.
- No external compressors, extract fans, or high-noise mechanical plant will be installed externally.
- External activity will be limited to the use of forklifts and HGVs for loading and unloading timber within the existing hardstanding yards.
- Roller shutter doors to the north elevation will be opened during loading operations but otherwise kept closed to conserve heat and minimise sound breakout.
- Typical working hours are anticipated to be 08:00–17:00 Monday to Friday, with occasional out-of-hours loading or deliveries where necessary to meet logistical requirements.

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- **Operating hours may vary to meet business requirements, subject to management controls**, noting that any reasonable extension would remain materially less intensive than the former dairy operation and will be managed through the Noise Management Plan.

Chillers / principal historic noise source: As noted in the original report context, the dominant historic noise generator associated with the dairy operation was the three large chillers. These have been removed and will not be replaced (subject to completion of site acquisition) as they are not required for MRT/Tŷ Eco operations.

5. Relationship to Sensitive Receptors

The nearest residential property lies approximately 40m east of the site boundary (approximately 61m from the nearest factory building). This receptor is known as **Kalver's Farm**.

Two further dwellings are located to the south-east/east at approximately 100m and 200m distance, and another property lies approximately 95m north-west, screened by existing mature foliage and located approximately 15m–18m above the site in altitude (reflecting the local level differences).

Importantly:

- The closest dwelling(s) are already screened by the existing acoustic barrier fence installed by Tomlinson's, which remains in place and effective.
- The proposed operations are materially quieter than the previous dairy use, as no external chillers, compressors, or 24-hour process noise will occur.
- The wider receptor context benefits from existing landscaped bunding, buffer planting, mature vegetation, and the former railway corridor screening, together with the site's lower elevation relative to higher ground/road level in places.

6. Relevant Policy and Guidance

This assessment has been prepared with reference to:

- Planning Policy Wales (Edition 11) – which seeks to prevent new development from creating adverse noise impacts, while ensuring decisions are proportionate to the scale and nature of development.
- Technical Advice Note (TAN) 11: Noise (1997) – which establishes the need to consider the compatibility of noise-generating uses with their surroundings and advocates mitigation where necessary.
- BS 4142:2014+A1:2019 – the British Standard for assessing industrial and commercial sound.

TAN 11 and PPW11 both emphasise that assessment requirements should be proportionate to the potential impact, taking into account existing background sound levels and the character of the locality.

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7. Assessment and Discussion

- The proposed B2/B8 operations are of the same nature and scale as those already conducted by MRT immediately adjacent to the site.
- MRT has operated in this location for nearly 50 years without a single recorded noise complaint, confirming that comparable activity is acceptable within the local context.
- By contrast, the former dairy operations were substantially more intensive and continuous. The removal of the principal historic plant noise sources (notably the chillers/compressors) represents a net reduction in noise potential from the site.
- All significant noise sources (saws, presses, machinery) will remain inside insulated factory buildings. The only external sources will be occasional forklift movements and HGV manoeuvres, which are typical for an industrial estate setting.
- Whilst typical hours are anticipated to be 08:00–17:00 Monday to Friday (with occasional out-of-hours logistics), operating hours may vary to meet business requirements, subject to management controls. Any reasonable extension would remain materially less intensive than the former dairy operation and will be managed through the Noise Management Plan.
- The site benefits from substantial existing physical mitigation, including the 15ft acoustic fence to the south-east (screening Kalver's Farm), extensive landscaped bunding and buffer planting (especially west and north), and the historic bunding/vegetation along the former railway corridor.

Given these factors, the proposal will not materially alter the established noise climate of the area. No adverse impacts are anticipated at nearby residential receptors, and the development is fully compatible with its industrial surroundings.

8. Mitigation and Management Measures

Although no specific mitigation is required to make the development acceptable in principle, MRT / Tŷ Eco will implement the following good practice measures to maintain low noise levels:

- Keep roller shutter doors closed when not actively loading/unloading.
- Restrict noisy operations to normal daytime hours wherever practicable.
- Maintain and retain the existing acoustic boundary fencing installed by Tomlinson's Dairy (repair/replace panels as necessary).
- Retain existing landscaped bunding and buffer planting and **supplement planting where possible** (no new bund earthworks proposed).
- Continue regular maintenance of machinery and vehicles to minimise noise output.

In addition, and as a condition of planning where required, MRT / Tŷ Eco will prepare and implement a full **Noise Management Plan**. This plan will be proportionate to the proposed use and will include, as a minimum:

- Practical controls for external yard activities, loading/unloading and delivery scheduling (including occasional out-of-hours activity).
- Good practice measures for plant and equipment use and maintenance.
- A named **point of contact** for noise matters.
- A **complaint logging and response procedure**, including investigation steps and corrective actions where necessary.

These measures ensure continued compliance with the intent of TAN 11 and BS 4142.

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9. Conclusion

Based on the information provided and the site's operational history, the proposed change of use will not give rise to any adverse noise impact.

The development:

- Represents a significant reduction in noise potential **compared to the lawful fallback** (Dairy) use, including removal of the principal historic noise generator (the large chillers) which have been removed and will not be replaced.
- Is consistent with the long-established industrial character of the area.
- Is supported by a 50-year history of neighbouring operations with no noise complaints.
- Benefits from existing physical noise mitigation measures (acoustic fencing; landscaped bunding and buffer planting; former railway corridor bunding/planting; and local topography/level separation), which will be retained and enhanced through supplementary planting where practicable.
- Will be further managed through a Noise Management Plan secured by condition where required.

In accordance with Planning Policy Wales (Edition 11) and TAN 11, this statement concludes that the proposed development is acceptable in noise terms, and that a full acoustic survey is not necessary for determination.

Prepared by:
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on behalf of: Minera Roof Trusses Ltd & Tŷ Eco MMC Ltd.
October 2025
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