NoiseAir
ACOUSTICS & AIR QUALITY

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Our Ref: P9041-L1-V1

19th February 2026

Moss Bank Farm

F.A.O: Ian Jones, Public Protection Service Manager

RE: P/2025/0510 – Moss Bank Farm, Borras Road, Borras, Wrexham LL13 9TN

I am in receipt of a number of comments seeking clarification on the noise report ref: P9041-R1-V1 dated 21st October 2025.

I have presented the comments in red colour with responses below for ease of reference and reading.

> *"The report has described the noise environment as:*
>
> *3.2.2 Measured sound levels were noted to consist of non-descript distant traffic noise with some low level noise emissions from the quarry, typically in the form of diesel engines.*
>
> *Which are not the expected noise levels for a working quarry. There has been no description of how close to the proposal the recorded works where and whether they could or would be expected to get closer. A discussion on the activities that could take place at the closest working point in the quarry would be appropriate. If it is the case that the sound levels recorded during the monitoring are not worst case then those levels should be used in the assessment so as to confirm either that there will be no effect on the proposal or to design an appropriate scheme of mitigation."*

We do not agree with the notion that the noise levels measured are "not the expected noise levels [redacted] ehind an earth bund and also benefits from reasonably dense [redacted] ise at the applicant's property. This subjective statement also does not align with extensive experience NoiseAir has of quarry operations and the associated noise emissions. Conversely there are numerous examples where quarries are located in close proximity to residential properties with no issue and where any noise complaints do occur these are proactively managed. Borras Road itself accommodates multiple properties in close proximity to the quarry and noise emissions from the quarry are appropriately managed to minimise risk. To suggest

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that a working quarry should have an expected emission level is incorrect, subjective, simplistic and without basis.

The noise monitoring was conducted over several days where typical activity took place at the quarry. By nature, quarry operations are dynamic and the noise source(s) can move around. While it is was not possible to identify the precise location of the noise sources, it was clear when on site they were in the general locality such that I was confident that the noise levels measured can be considered typical.

I do not agree that the worst-case noise levels should form the fundamental basis of the assessment, this is not established practice for noise assessment. I also consider that a single discrete 'worst-case' event would be unlikely to form the basis of an upheld noise nuisance claim and also unlikely to be detrimental to health. Typical noise levels which occur on a regular basis can be detrimental to amenity and subsequently health, however. Given that noise emissions from Borras Quarry are well managed such situations of a worst-case scenario, rather than typical scenario, would not be common. In any case having visited the site on multiple occasions during the monitoring period I am comfortably satisfied that any plant operational at the quarry was reasonably close such that the dataset presents a moderately conservative representation of noise levels at the applicants property.

It is also worth pointing out that the measured noise levels are comfortably below both the BS 5228 threshold and also the BS 8233:2014 threshold inside the applicants property. The operations at Borras Quarry could reasonably increase by up to 5 dB(A) before the more stringent of the two standards would be breached. To provide context a 6 dB(A) increase in noise in this scenario would represent a quadrupling of noise energy emitted and approximately a doubling of loudness (in terms of human perception). Measured typical internal noise levels therefore are comfortably within established noise guidelines for residential properties.

Yours sincerely,

[redacted]

Matthew Malone, MSc (hons), PGDip (IOA), MIOA

Technical Director

For NoiseAir Limited