MEMORANDUM

wrexham COUNTY BOROUGH
BWRDEISTREF SIROL wrecsam

From: Roger Mapleson
Public Protection Service Manager

To: Mathew Philips
Head of Service Planning Development

Our Ref:

Your Ref: P/2025/0510

Date: 06-03-2026

Town and Country Planning Act 1990

Town and Country Planning (General Development Procedure) Order 1996

Re: P/2025/0510, MOSS BANK FARM, BORRAS ROAD, BORRAS, WREXHAM, LL13 9TN

NEWID DEFNYDD TIR O AMAETHYDDOL I BRESWYL I GYNNWYS LLEOLI ANNEDD CARTREF SYMUDOL, DRAENIO, PARCIO, DREIF A MYNEDIAD / CHANGE OF USE OF LAND FROM AGRICULTURAL TO RESIDENTIAL TO INCLUDE SITING OF MOBILE HOME DWELLING, DRAINAGE, PARKING, DRIVEWAY AND ACCESS

In response to the further details provided by the applicant I make the following comments:

Thank you for your report and for the prompt response you provided. We have read your observations regarding the earth bund, the intervening vegetation and the monitoring that was carried out between 26 September and 1 October 2025, and we note and accept your conclusion that the measured levels recorded during that period fell below the thresholds set out in BS 5228 and BS 8233. While that finding is welcome, it does not, on its own, remove our concern about the possibility that quarry activity may at some point move closer to the applicant's property.

That prospect is the principal source of our concern, and we therefore need clear, information rather than general reassurance to be satisfied that the assessment has adequately captured that possibility.

Accordingly, please set out full details of the bund and the vegetation that currently provide screening between the quarry and the property. For the bund, state its present height and length, describe the construction materials used and whether it is continuous or contains gaps or access points. For the vegetation, describe the type present, their density and the approximate height of the planting or growth, and if it's likely to change in the short to medium term.

We also require a clear statement about the quarry's planned operations. Please confirm explicitly whether there are any current plans to change working areas, haul routes, extraction faces or operating hours in a way that could bring quarry activities closer to the applicant's property either now or in the foreseeable future. If there are no such plans, state that clearly. If operations are expected to move closer, explain how that change has been considered in the assessment and how the agent of change principle in Planning Policy Wales (Edition 12) has been applied. Where movement of operations is anticipated, set out the mitigation measures that would be required or negotiated with the operator to protect the receptor.

Please also explain why the monitoring dataset you used is representative of likely future exposure at the receptor. state whether the monitoring period, timing and locations are sufficient to capture the range of likely operational conditions, including any worst-case activities. If there are limitations to the dataset, set those out clearly and explain how they affect confidence in the assessment.

We note and welcome the measured internal levels reported in your document, but the information requested above is necessary to reassure us that the possibility of closer activity has been considered and that the site will remain at a comfortable acoustic level within guidance should site operations change.

Air Quality

Further to the response provided by the quarry operators, it was correctly identified that consideration of potential dust impact from operations at the quarry was not identified as a requirement during the consultation with this section. I therefore recommend that an air quality report be provided by the applicant:

An air quality assessment for the pollutants PM10 and PM2.5 shall be carried out and a report of the findings submitted to, and approved in writing by, the Local Planning Authority. The assessment shall:

a) Use appropriate modelling methods, as described in 'Local Air Quality Management Technical Guidance LAQM TG (16)', and

b) Provide a detailed scheme so as to comply with objective levels in the Air quality (Wales) regulations.

Given the nature of operations at the quarry consideration and discussion of the potential for dust impacts at the proposal should also be provided in line with IAQM and other relevant legislation.

The required report should include:

- Identification of dust-generating activities from the operational quarry, including both routine and intermittent high-intensity activities
- Whether there are any current plans to bring quarrying operations closer to the proposal and the potential impact on dust / air quality that could result from this.

……

Head of Service Public Protection