Our Ref: NIA/1423/25/523/V1.0/Lord Street & Egerton Street, Wrexham

22nd December 2025

Belal Rashid
Belal Rashid Technical Architecture
11 Queen Street
Oldham
Greater Manchester
OL1 1RD

Dear Sir,

NOISE IMPACT ASSESSMENT

PROPOSED CHANGE OF USE TO SECOND FLOOR FROM OFFICES TO 6 SELF CONTAINED FLATS AT 22 TO 26 LORD STREET & 10 TO 14, EGERTON STREET, WREXHAM

WREXHAM COUNCIL PLANNING APPLICATION P/2024/1548 (RE–SUBMISSION)

1.00 INTRODUCTION

1.01 RP Acoustics Limited has been commissioned to undertake a noise impact assessment for a proposed change of use to second floor from offices to 6 self-contained flats at 22 to 26 Lord Street and 10 to 14 Egerton Street, Wrexham, LL11 1LR (hereafter referred to as the application site).

1.02 Planning Application P/2024/1548 was refused by Wrexham County Borough Council on 13th March 2025. Reason 1 for refusal was stated as:

In the absence of an appropriate night and day acoustic assessment, it is not possible to conclude that the future occupiers of the proposed development would not be unduly impacted by the adjacent commercial premises and the night time economy. It has not been demonstrated that the proposed use is compatible with the existing nearby uses and the proposed development would not therefore accord with LDP policies DM1 ii) and R4.

1.03 The objectives of the noise impact assessment were therefore to:

- Determine the ambient daytime and nighttime ambient noise levels and the maximum night time noise levels at the application site over the course of a weekend
- Assess the suitability of the application site for residential development in terms of noise in accordance with the relevant guidelines
- If required, provide recommendations for mitigation measures to protect residential amenity in accordance with the relevant guidelines

1.04 This report sets out the methodology and findings of the assessment. It has been prepared for the sole purpose described above and no extended duty of care to any third party is implied or offered. Third parties making reference to the report should consult Belal Rashid Technical Architecture and RP Acoustics Limited as to the extent to which the findings may be appropriate for their use.

1.05 A glossary of acoustic terms is contained in Appendix 1 for reference.

Continued from page 1

2.00 APPLICATION SITE SETTING AND PROPOSED DEVELOPMENT

2.01 The application site relates to the second floor of a large commercial building within Wrexham city centre which fronts onto the pedestrianised shopping street of Lord Street and is bounded to the west by Egerton Street. The wider surrounding area is predominantly commercial in character with a range of small and medium businesses in operation.

2.02 Lord Street contains a mix of two and three storey buildings, many of which are of a flat roof design. The ground floor is separated into retail units with the first floor used for storage in connection with the ground floor uses. The second floor currently comprises office accommodation. A separate access to the upper floors is provided via an entrance door on the Lord Street elevation.

2.03 The application site location plan is reproduced in Appendix 2 for reference.

2.04 The application seeks permission for the change of use of the second floor of the building to provide 6 self-contained flats. Each flat will have one bedroom, an open plan living, kitchen and dining area, and a bath/shower room. Access to the self-contained flats will be from two flights of stairs leading off an existing entrance between the retail units on Lord Street.

2.05 The proposed second floor plan is reproduced in Appendix 3 for reference.

3.00 BASELINE NOISE SURVEY

3.01 A baseline noise survey was carried out at the application site on Friday 9th May 2025 through to Monday 12th May 2005.

3.02 For the purpose of the assessment, the following noise monitoring positions were adopted (see Appendix 4):

- NMP1 was located at 2nd floor (below roof level) on the Lord Street façade
- NMP2 was located at 2nd floor (below roof level) on the Egerton Street façade

3.03 Baseline noise measurements were undertaken using NTi Audio XL2 Type 1 integrating sound level meters. A 90 mm windshield was fitted for all measurements. The measurement system calibration was verified immediately before and after measurement sessions and no drift in calibration level was noted (calibration certificate reproduced in Appendix 5 for reference). Weather conditions throughout the survey were appropriate for monitoring.

3.04 Baseline noise measurements consisted of A–weighted broadband parameters (1/3 octave) with a logging interval of 1 second. The following table contains a summary of the data rounded to the nearest decibel (with a – 3 decibel façade enhancement correction applied in order to establish free field noise levels, which are used for categorisation in accordance with Technical Advice Note (TAN) 11: Noise).

3.05 The ambient noise climate is wholly commensurate with a city centre location and consists of mixed sources including local and distant traffic, pedestrians and distant plant; no entertainment noise was audible at any stage throughout the recordings.

3.06 For reference, Table Taps (Wrexham's first licensed board game club) is located adjacent to the application site at 28 Lord Street. The advertised opening hours are 1400–2300 hours Monday, Wednesday and Thursday and 1400–0000 hours Friday and Saturday. It is understood that the venue holds infrequent 'Geekaraoke' (9 events in total in 2025 including coinciding with public holidays such as Easter, Xmas and New Years Eve) in the Castle Suite which is located on Lord Street (not overlooked by any habitable rooms at the application site) and only holds up to 15 persons. There is also a small beer garden at the rear (not overlooked by any bedrooms at the application site), which is not considered any different in character to, for example, pavement tables to Vasco de Gama Bar and Grill on Lord Street.

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Table 3.1 – Baseline Noise Measurement Data

NMP	Date	Time	L_{Aeq} (dB)	L_{A90} (dB)	L_{A10} (dB)	L_{A1} (dB)	Comments
1	Friday 09/05/2025	1700–2300	57	53	62	62	Mixed ambient noise climate of distant traffic, pedestrians and distant plant; no entertainment noise audible
	Saturday 10/05/2025	0700–2300	56	49	60	60	
	Sunday 11/05/2025	0700–2300	51	45	53	53	
	Friday 09/05/2025	1700–2300	48	43	48	59	
	Saturday 10/05/2025	0700–2300	48	43	50	60	
Day Time Ambient Noise Level = 56 dB $L_{Aeq\ (0700–2300)}$ Night Time Ambient Noise Level = 48 dB $L_{Aeq\ (2300–0700)}$ ProPG / AVO: 11th Highest Night Time Maxima = 68 dB $L_{AFMax\ (2300–0700,\ 1\ minute\ logging)}$ TAN 11: 17th Highest Night Time Maxima = 65 dB $L_{ASMax\ (2300–0700,\ 1\ minute\ logging)}$ Typical diurnal pattern Lord Street Façade located at the lower end of TAN 11 Noise Exposure Category B							
2	Friday 09/05/2025	1700–2300	54	49	57	61	Mixed ambient noise climate of local and distant traffic, pedestrians and distant plant; no entertainment noise audible
	Saturday 10/05/2025	0700–2300	56	48	57	63	
	Sunday 11/05/2025	0700–2300	54	46	55	62	
	Monday 12/05/2025	0700–1200	54	47	56	61	
	Friday 09/05/2025	1700–2300	50	46	52	60	
	Saturday 10/05/2025	0700–2300	50	46	53	61	
	Sunday 11/05/2025	0700–2300	49	45	50	57	
Day Time Ambient Noise Level = 56 dB $L_{Aeq\ (0700–2300)}$ Night Time Ambient Noise Level = 50 dB $L_{Aeq\ (2300–0700)}$ ProPG / AVO: 11th Highest Night Time Maxima = 68 dB $L_{AFMax\ (2300–0700,\ 1\ minute\ logging)}$ TAN 11: 17th Highest Night Time Maxima = 66 dB $L_{ASMax\ (2300–0700,\ 1\ minute\ logging)}$ Egerton Street Façade located at the lower end of TAN 11 Noise Exposure Category B							

4.00 NOISE RELATED GUIDANCES

Technical Advice Note (Wales) 11: Noise

4.01 Technical Advice Note (TAN) 11: Noise is a document issued by the Welsh Government that outlines the considerations and guidelines for managing noise in the context of planning and development. It aims to ensure that noise generating developments do not cause unacceptable disturbances to surrounding areas, particularly noise-sensitive locations such as residential neighbourhoods.

4.02 Paragraph 10 of TAN 11 states *'Local planning authorities should consider whether proposals for new noise-sensitive development would be incompatible with existing activities, taking into account the likely level of noise exposure at the time of the application and any increase that may reasonably be expected in the foreseeable future. Such development should not normally be permitted in areas which are, or are expected to become, subject to unacceptably high levels of noise and should not normally be permitted where high levels of noise will continue throughout the night'.*

Continued from page 3

4.03 When assessing a proposal for residential development near a source of noise, local planning authorities should determine into which of the four noise exposure categories (NECs) the proposed site falls, taking account of both day and night-time noise levels. A recommended range of noise levels is given below for each of the NECs for dwellings exposed to noise from road, rail, air and 'mixed sources'. The NEC procedure is only applicable where consideration is being given to introducing residential development into an area with an existing noise source, rather than the reverse situation where new noise sources are to be introduced into an existing residential area. This is because the planning system can be used to impose conditions to protect incoming residential development from an existing noise source.

Table 4.1 – TAN 11 Noise Exposure Categories (NECs)

RECOMMENDED NOISE EXPOSURE CATEGORIES FOR NEW DWELLINGS NEAR EXISTING NOISE SOURCES				
Noise Levels (1) Corresponding to the Noise Exposure Categories for New Dwellings $L_{Aeq,T}$ dB				
Noise Source	**A**	**B**	**C**	**D**
Mixed Sources(4) 0700–2300	**< 55**	**55 – 63**	**63 – 72**	**> 72**
2300–0700 (2)	**< 45**	**45 – 57**	**57 – 66**	**> 66**

Notes

1 The noise level(s) ($L_{Aeq,T}$) used when deciding the NEC of a site should be representative of typical conditions.

2 Sites where individual noise events regularly exceed 82 dB $L_{AMax\ (S\ time\ weighting)}$ several times in any hour should be treated as being in NEC C, regardless of the $L_{Aeq,8h}$ (except where the $L_{Aeq,8h}$ already puts the site in NEC D).

4 The 'mixed source' values are based on the lowest numerical values of the single source limits in the table. The 'mixed source' NECs should only be used where no individual noise source is dominant.

4.04 With reference to the measured noise levels, the application site is located at (the lower end of) Noise Exposure Category B.

ProPG: Planning & Noise: Professional Practice Guidance on Planning & Noise 2017

4.05 ProPG has been produced to provide practitioners with guidance on the recommended approach to the management of noise within the planning system in England. The Institute of Acoustics, Chartered Institute of Environmental Health and the Association of Noise Consultants have worked together to produce the guidance, which encourages better acoustic design for new residential development and aims protect people from the harmful effects of noise.

4.06 ProPG advocates a Stage 1 Initial Site Noise Risk Assessment to provide an indication of the likely risk of adverse effects from noise were no subsequent mitigation to be included as part of the development proposal. It should indicate whether the proposed site is considered to pose a negligible, low, medium or high risk from a noise perspective. Figure 4.1 shows ProPG 'Stage 1 Initial Site Noise Risk Assessment'. The indicative noise levels are intended to provide a sense of the noise challenge at a potential residential development site and should be interpreted flexibly having regard to the locality, the project and the wider context.

4.07 Whilst it is acknowledged that ProPG has not necessarily been adopted in Wales, it is considered that the site noise risk rating is relevant irrespective of country.

Continued from page 4

Figure 4.1 – ProPG Stage 1 Initial Site Noise Risk Assessment (Blue Box = Application Site)

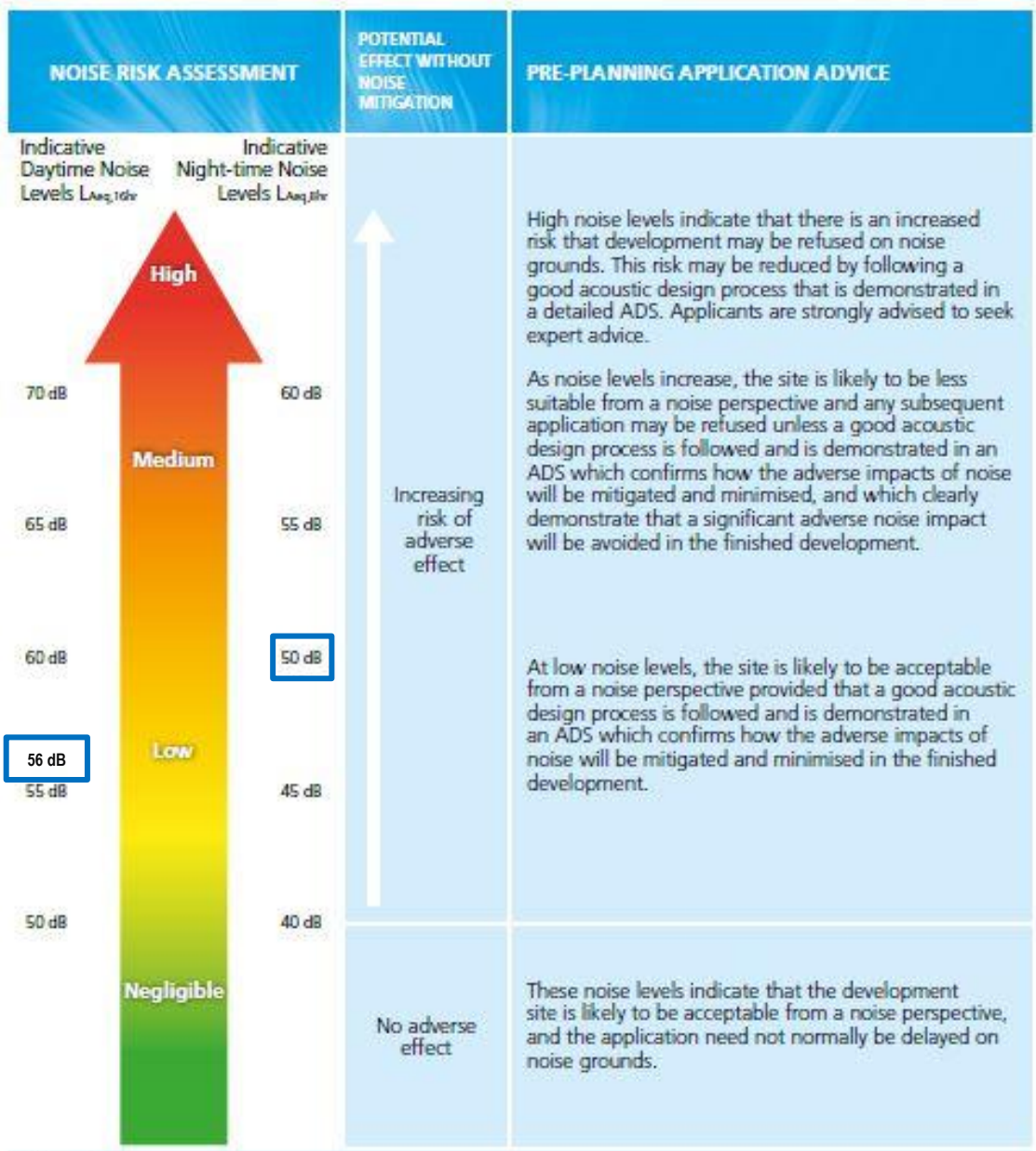


Figure 1. Stage 1– Initial Site Noise Risk Assessment

4.09 With reference to Figure 4.1, the application site is categorised as being at '**low risk**' from noise.

Continued from page 5

Acoustics, Ventilation and Overheating (AVO) Residential Design Guide 2020

4.10 The AVO Guide has been produced by the Association of Noise Consultants and the Institute of Acoustics and is intended to be used by acoustics practitioners as well as all those involved in the planning, development, design and commissioning of new dwellings. It recommends an approach to acoustic assessments for new residential development that take due regard of the interdependence of provisions for acoustics, ventilation, and overheating. Application of the AVO Guide is intended to demonstrate good acoustic design as described in ProPG.

4.11 AVO guidance makes a clear distinction between provisions for fresh air to achieve whole dwelling ventilation rates (ADF ventilation condition), and provisions for ventilative cooling to mitigate overheating (overheating condition). In terms of noise effect, the important distinction between these two situations is that the ADF ventilation condition applies for the entire time whereas the overheating condition applies only for part of the time.

4.12 AVO states '*The guidance makes a clear distinction between provisions for fresh air to achieve whole dwelling ventilation rates (ADF ventilation condition) and provisions for ventilative cooling to mitigate overheating (overheating condition). In terms of noise effect, the important distinction between these two situations is that the ADF ventilation condition applies for the entire time whereas the overheating condition applies only for part of the time ... It is suggested here that the desirable internal noise standards within Table 4 of BS 8233:2014 should be achieved when providing adequate ventilation as defined by ADF whole dwelling ventilation. However, it is considered reasonable to allow higher levels of internal ambient noise from transport sources when higher rates of ventilation are required in relation to the overheating condition.'*

4.13 The AVO Guide addresses:

a) the ventilation strategy impacts on the acoustic conditions; and

b) the strategy for mitigating overheating impacts on the acoustic conditions, and whether a more detailed overheating assessment is required to inform this

4.14 In the case of environmental noise ingress, a two-level assessment procedure is described for the overheating condition.

4.15 The first level is a site risk assessment based on external noise levels and the assumption that opening windows are the primary means of mitigating overheating.

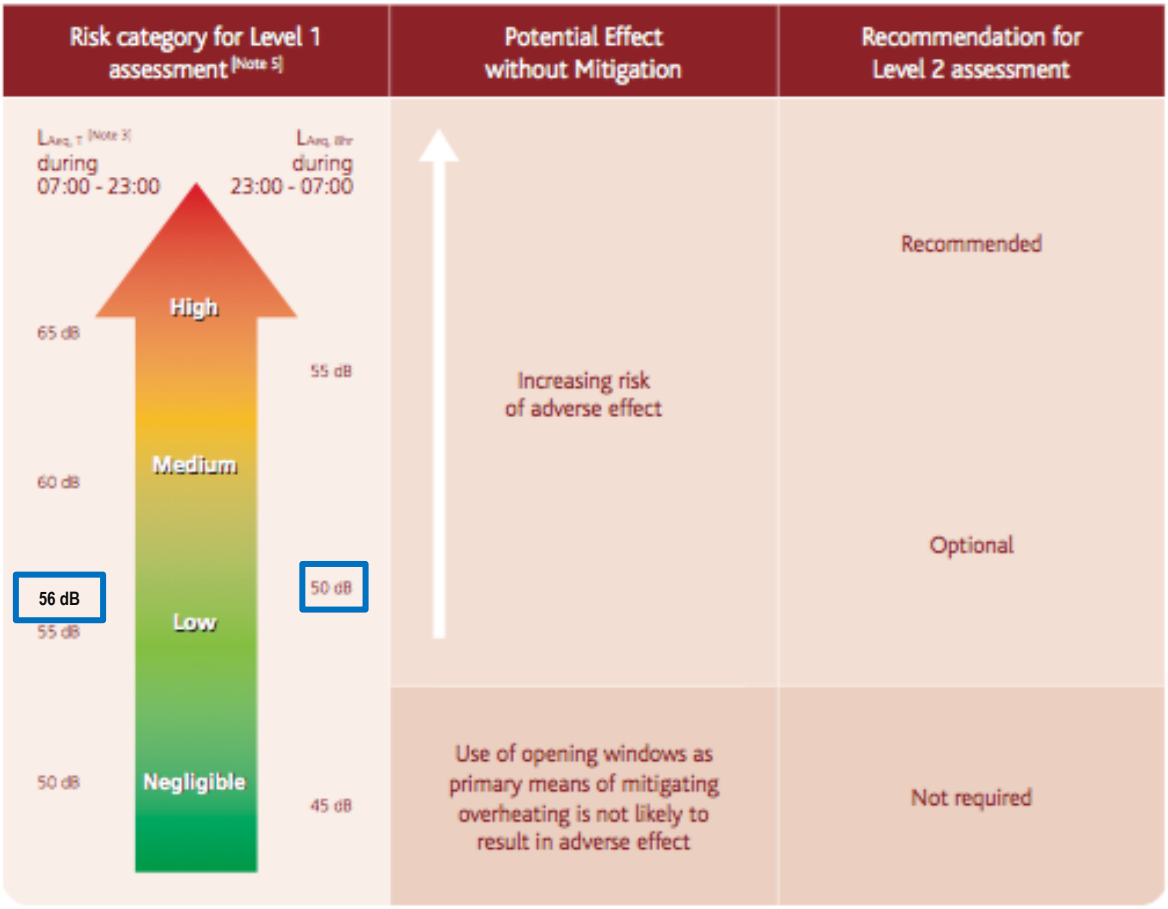
4.16 The second level assessment considers the potential for adverse effect on occupants based on internal ambient noise level.

4.17 Figure 4.2 shows AVO Table 3.2, which provides guidance for a Level 1 site risk assessment of noise relating to overheating condition.

4.18 With reference to Figure 4.2, the application site is categorised as being at '**low risk**' from overheating.

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Figure 4.2 – AVO Level 1 Site Risk Assessment Relating to Overheating Condition (Blue Box = Application Site)



Note 1 The noise levels suggested assume a steady road traffic noise source but may be adapted for other types of transport. All levels are external free-field noise levels.

Note 2 The values presented in this table should not be regarded as fixed thresholds and reference can also be made to relevant dose-response relationships, [15, 17].

Note 3 A decision must be made regarding the appropriate averaging period to use. The averaging period should reflect the nature of the noise source, the occupancy profile and times at which overheating might be likely to occur. Further guidance can be found within the 2014 IEMA Guidelines [23].

Note 4 Refer also to references [1, 17, 18, 22] for further guidance regarding individual noise events. Where 78dB LAFmax is normally exceeded during the night-time period (23:00-07:00), a Level 2 assessment is recommended.

Note 5 The risk of an adverse effect occurring will also depend on how frequently and for what duration the overheating condition occurs. Refer to Figure 3-2.

Note 6 To evaluate the risk category for a dwelling, all three aspects of external noise exposure (i.e. daytime, night-time and individual noise events) should be evaluated. The highest risk category for any of the three aspects applies.

4.19 In order to avoid excessively high temperatures and provide adequate levels of thermal comfort within dwellings, an overheating mitigation strategy must be developed. In relatively low noise areas (such as the application site), this strategy can often rely upon opening windows as the primary source of ventilation, however, in areas with higher levels of noise, this would present a risk of adverse effects on health and quality of life.

4.20 The proposed residential development represents a material change of use. As a consequence, the criteria set out in Approved Document O 'Overheating' (ADO) are not applicable. Notwithstanding this, however, to allow for a reasonable living environment, it is recommended that the less onerous criteria given in AVO are appropriate (as summarised below). For reference the attenuation of a partially open window is at least 13 dB(A).

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Table 4.2 – External Noise Level Limits for Overheating Criteria

Period	Overheating Criteria[1]	
	Internal	External
L_{Aeq} Daytime (0700–2300)	50	63
L_{Aeq} Night-time (0700–2300)	42	55
L_{AFMax} Night-time (0700–2300)[2]	65	78

Notes 1 See AVO Table 3-3; above these levels AVO 'noise causes a material change in behaviour, e.g. having to keep windows closed most of the time'

2 L_{AFMax} exceeded fewer than 10 times per night i.e. 11th highest night time maxima

4.21 It is evident that internal daytime ambient noise levels and night time ambient and maximum noise levels with a partially open window are well below the threshold at which '*noise causes a material change in behaviour, e.g. having to keep windows closed most of the time*'. On this basis, an alternative means of ventilation (mechanical) is not justified.

4.22 Based on the relatively low external daytime ambient and night time ambient and maximum noise levels (TAN 11 Noise Exposure Category B, ProPG low risk of noise, AVO low risk of overheating), it is considered that the existing double glazed windows when partially open are appropriate in accordance with the relevant guidance documents.

4.23 For reference the the party wall with 28 Lord Street is understood to be two separate cavity masonry walls abutted together. This will afford very significant airborne sound insulation significantly above that required by Building Regulations. Notwithstanding this, in accordance with the precautionary principle, it is recommended that the party wall to (the room side of) Flat 6 is upgraded with an independent wall lining consisting of a 10 mm (minimum) gap to the party wall, 50 mm (minimum) stud with 50 mm (minimum) mineral wool insulation (density 10 to 45 kg/m^3) between studs and 2 x 12.5 mm sound bloc plasterboard (joints staggered).

5.00 CONCLUSION

5.01 A noise impact assessment has been undertaken for a proposed change of use to second floor from offices to 6 self-contained flats at 22 to 26 Lord Street and 10 to 14 Egerton Street, Wrexham, LL11 1LR.

5.02 The relatively low external daytime ambient and night time ambient and maximum noise levels measured over a weekend in order to capture the night time economy of the city centre environment, place the application site in TAN 11 Noise Exposure Category B, at a low risk from noise in accordance with ProPG: Planning & Noise: Professional Practice Guidance and at low risk from overheating in accordance with the Acoustics, Ventilation and Overheating Residential Design Guide.

5.03 It is considered that the existing double glazed windows when partially open is appropriate in accordance with the relevant guidance documents.

5.04 In conclusion, noise does not represent a material constraint to the granting of planning permission.

We trust the foregoing is to your satisfaction. Should you have any queries, please do not hesitate to contact us.

Yours sincerely

Richard Pennell
Member of the Institute of Acoustics
For and on behalf of RP Acoustics Ltd

APPENDIX 1
GLOSSARY OF ACOUSTIC TERMS

Sound Pressure Level (L_p)

The basic unit of sound measurement is the sound pressure level. As the pressures to which the human ear responds can range from 20 µPa to 200 Pa, a linear measurement of sound levels would involve many orders of magnitude. Consequently, the pressures are converted to a logarithmic scale and expressed in decibels (dB) as follows:

$L_p = 20 \log_{10}(p/p_0)$

Where L_p = sound pressure level in dB; p = rms sound pressure in Pa; and p_0 = reference sound pressure (20 µPa).

A-weighting Network

A frequency filtering system in a sound level meter, which approximates under defined conditions the frequency response of the human ear. The A-weighted sound pressure level, expressed in dB(A), has been shown to correlate well with subjective response to noise.

Equivalent continuous A-weighted sound pressure level, $L_{Aeq, T}$

The value of the A-weighted sound pressure level in decibels of continuous steady sound that within a specified time interval, T, has the same mean-square sound pressure as a sound that varies with time. $L_{Aeq, 16h}$ (07:00 to 23:00 hours) and $L_{Aeq, 8h}$ (23:00 to 07:00 hours) are used to qualify daytime and night time noise levels.

$L_{A10, T}$

The A-weighted sound pressure level in decibels exceeded for 10% of the measurement period, T. $L_{A10, 18h}$ is the arithmetic mean of the 18 hourly values from 06:00 to 24:00 hours.

$L_{A90, T}$

The A-weighted sound pressure level of the residual noise in decibels exceeded 90% of a given time interval, T. L_{A90} is typically taken as representative of background noise.

$L_{AF\ max}$

The maximum A-weighted noise level recorded during the measurement period. The subscript ‘F’ denotes fast time weighting, slow time weighting ‘S’ is also used.

Sound Exposure Level (SEL or L_{AE})

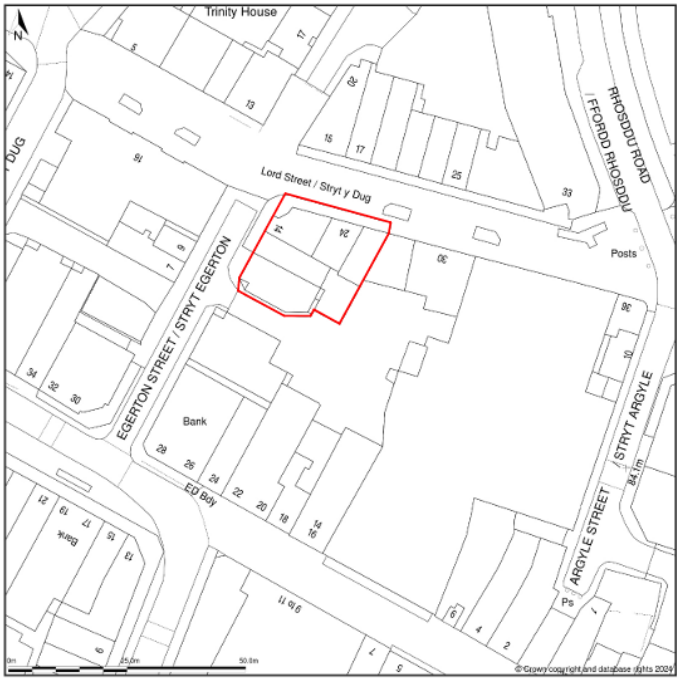
The energy produced by a discrete noise event averaged over one second, no matter how long the event actually took. This allows for comparison between different noise events that occur over different lengths of time.

APPENDIX 2
APPLICATION SITE LOCATION PLAN

Buy A Plan®

Ordnance Survey Licensed Data

Lord Street, Wrexham, LL11 1LR



Location Plan shows area bounded by: 333297.68, 350353.95 333439.1, 350495.37 (at a scale of 1:1250), OSGridRef: SJ33365042. The representation of a road, track or path is no evidence of a right of way. The representation of features as lines is no evidence of a property boundary.

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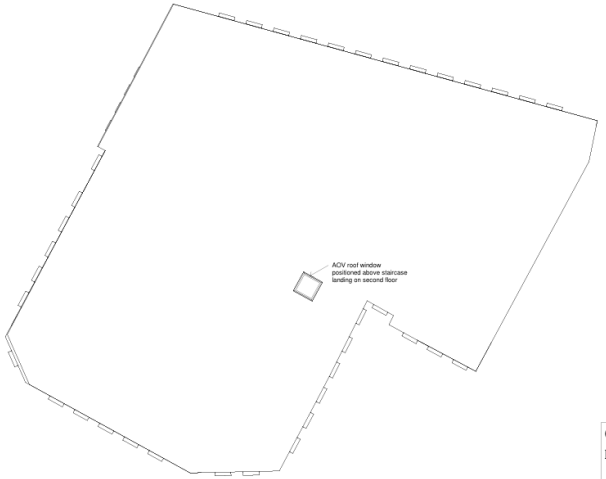
BRTA

Belal Rashid Technical Architecture - Tel: 0161 241 9650

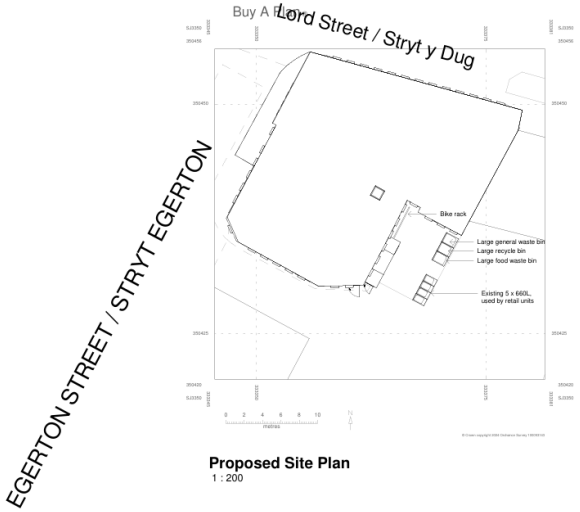
APPENDIX 3
PROPOSED SECOND FLOOR PLAN



Proposed Second Floor
1 : 100



Proposed Roof Plan
1 : 100



Proposed Site Plan
1 : 200

Scale: @ A1.
Do NOT scale from this drawing.
If in doubt, ask.
Dimensions must be checked by contractor before work is commenced.

This drawing remains the property of Belal Rashid Technical Architecture and should not be reproduced in full or in part without prior consent from Belal Rashid Technical Architecture.

Client:
Mr Mohammed Ikram

Project:
Change of use
Project Address:
Lord Street
Wrexham
L11 1LR

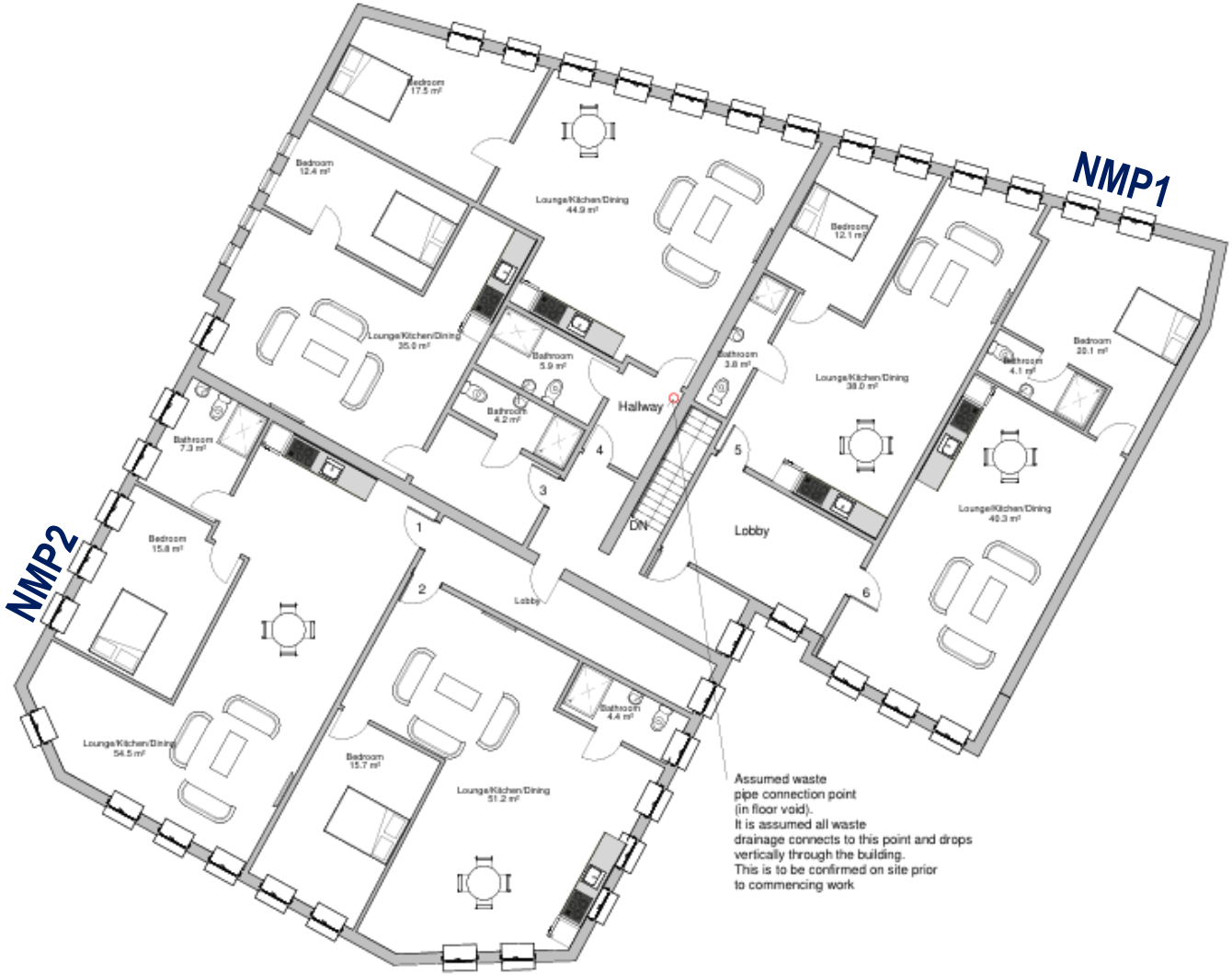
Drawing Name:	Proposed Layout
Drawing Number:	A104
Drawing Date:	31/07/24
Author:	B.Rashid

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BRTA

APPENDIX 4
NOISE MONITORING POSITIONS



Proposed Second Floor

APPENDIX 5
CALIBRATION CERTIFICATE FOR SOUND LEVEL METER (CALIBRATION EVERY 2 YEARS)

Laboratory Location
Campbell Associates Ltd
5b Chelmsford Road Industrial Estate
GREAT DUNMOW, Essex, GB-CM6 1HD
Phone 01371 871030

Certificate of Calibration and Conformance

Certificate number: **U46717**

Test Object:	**Sound Level Meter, BS EN IEC 61672-1:2013 Class 1** **Associated Frequency Analyser to BS EN IEC 61260:1996 Class 1**
Producer:	**NTi Audio**
Type:	**XL2-TA**
Serial number:	**A2A-17283-E0**
Customer:	**RP Acoustics Ltd**
Address:	**1 Dobcroft Close,** **Sheffield. S11 9LL.**
Contact Person:	**Richard Pennell**
Order No:	**RPA/24/CAL/01**

Introduction:
Calibration has been performed as set out in CA Technical Procedures which are based on the procedures for periodic verification of sound level meters as per the **Test Object** listed above. Results and conformance statement are overleaf and detailed results, where appropriate, are provided in the attached Measurement Report.

Tested:	*Producer*	*Type*	*Serial No*	*Certificate No*
Microphone	NTi Audio	MC230A	A23655	46716
Calibrator*	Larson Davis	CAL200	17115	U46700
Preamplifier	NTi Audio	MA220	11174	Included

* The calibrator was complete with any required coupler for the microphone specified.

Additional items that have also been submitted for verification:

Wind shield	N/A
Attenuator	N/A
Extension cable	N/A

These items have been taken into account wherever appropriate.

Instruction Manual: NTi-Audio XL2 Operating Manual v3.11.02 August 2016 Firmware Version: V4.71 The test object is a single channel instrument.

Conditions	*Pressure kPa*	*Temperature °C*	*Humidity %RH*
Reference conditions	101.325	23	50
Measurement conditions	97.15 ±0.02	22.30 ±0.4	43.48 ±0.65

Calibration Dates:

Received date:	23/01/2024	Reviewed date:	09/02/2024
Calibration date:	09/02/2024	Issued date:	09/02/2024

Technicians: (Electronic certificate)

Calibrated by: *Palanivel Marappan B.Eng (Hons), M.Sc*

Reviewed by: *Darren Batten*

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