wrexham
COUNTY BOROUGH COUNCIL
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MEMORANDUM

From: **Roger Mapleson**
Head of Service Public Protection

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

Our Ref:

Your Ref: P/2025/0833

Date: 14-07-2026

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

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 'Residential Noise Assessment, Site Address: Roxburgh House, 12 Hill Street, Wrexham, LL11 1SN' Reference: NP-014316. Dated 26-06-26, by Nova Acoustics. Has carried out a further noise assessment (05 to 08-06-2026) as well as considering the main noise sources in the immediate area.

Monitoring carried out by Nova Acoustics has demonstrated a lower noise environment than that reported in the original noise 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 - See memo from this section dated 23-12-25) such that Nova has identified Noise Exposure Categories (NEC) of Technical Advice Note (TAN) 11 as 'B' for Regent Street and Hill Street during the day and 'B / C' For Regent Street during the night and 'B' for Hill Street during the night. Monitoring in the rear area to the proposal showed a daytime NEC of 'A' and a nighttime NEC of 'B'

Whereas it is appreciated that the noise environment is not constant, especially given the noise sources in this locale. Nevertheless monitoring has been provided that shows the noise environment in the proposed area can be louder (see the above NoiseAir report) which cannot be dismissed as it demonstrates the noise environment can reach those levels. There has been no discussion of this in the latest Nova report which has proceeded on the basis of their own monitoring.

It is anticipated that any mitigation proposed in the Nova report would be adequate to protect future occupiers of the proposal based on their recorded noise levels. However, this has not been fully reviewed given the existence of monitoring data that shows a nighttime NEC of D on the corner of Regent Street and Hill Street in the NoiseAir report. The NoiseAir report also suggested that the second caveat in TAN 11 was being met, in that nighttime 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). This was a moot point in the

NoiseAir assessment as the NEC was already 'D'. However, in the event of any re-review of the data, this should be discussed. For clarity, NEC D is classed in TAN 11 as 'Planning permission should normally be refused' in the TAN.

The Nova report has rightfully discussed the agent of change principle, though in the context of the rear delivery area. It is worth pointing out that this would usually be an effective way of reducing environmental noise and so be a legitimate means of changing the NEC. Given that the NoiseAir report identified the Regent Street & Hill Street area NEC D noise as a combination of traffic and pedestrian. It is difficult to envision any agent of change scheme that could be used to address this. Designing mitigation into the proposal is permissible in the TAN for NEC B as standard and NEC C when development is supported.

The Nova and NoiseAir reports are broadly in agreement concerning the rear area to the proposal with both reports identifying the worst NEC as B for nighttime. The Nova report has confirmed that further investigation is warranted and carried out a BS4142 assessment (Methods for rating and assessing industrial and commercial sound) for both plant noise and deliveries. This assessment has modelled that significant adverse impact is predicted from both of these. The report, as has been mentioned, has considered the agent of change principle. However, the first point in the hierarchy 'Reduction of noise at the source' has been discounted by 'there is no affiliation between the applicant and the nearby establishments'. With the inference being that no attempt has been made to contact any of the applicable establishments to enter into discussions on this. As this would seem the most affective and sustainable way of improving the noise environment and I recommend that the applicant be asked to reconsider this stance.

The second point 'Reorientation of the development and acoustic shielding' has a commentary recommending an investigation into establishing circulation areas. No further detail has been provided as to whether this will be actioned or details as to specifics. Presumably the further discussion that this 'may' result in a loss of usable apartment floor space and there would be restriction on natural light ingress with the corresponding reduction in quality of life means it has been discounted.

The third point 'Enhanced façade sound insulation treatment' would appear to be the favoured option and as such mechanical ventilation has been recommended. However, the report telling states:

The acceptability of this strategy will have to be agreed with the LPA as there will still be an inherent risk in developing residential accommodation in this location.

The proposed glazing standard in the report for the rear area of the proposal is predicted to achieve the internal noise levels recommended in BS8233. The report has also confirmed the minimum construction make up for exterior walls (paragraph 5.4) and stated that this should be confirmed as being the case or a further assessment will likely be required. In the event that planning is minded to support this application I recommend that this be required of the applicant. The report has also recommended the acoustic performance for any mechanical ventilation (paragraph 7.1) and again the event that planning is minded to support this application I recommend that this be conditioned on any planning permission, subject to the overheating standards being approved by building control.

The report has confirmed the existing floor between the residential and commercial units (except Hill Street Social, see next) exceeds the minimum requirement to resist the passage of any likely noise.

Noise breakthrough from Hill Street Social is predicted as likely through the existing floor and as such a mitigation scheme has been detailed in paragraph 8.3. This is accepted and I recommend it be conditioned on any planning permission should planning be minded to support his application. Furthermore, the report comments (page 32):

The development cannot achieve compliance until sound insulation testing is carried out by a UKAS accredited sound insulation testing company upon completion and assessed against the required sound insulation standard.

So as to demonstrate that the any insulation has achieved the required levels of noise mitigation I recommend the following condition be attached to any planning permission:

Post completion of the insulation and prior to internal decoration sound insulation testing shall be undertaken by a suitably qualified acoustic consultant in accordance with the recommendations contained within Section 8 of the Residential Noise Assessment prepared by NOVA Acoustics Ltd (Reference NP-014316 Revision 02, dated 26 June 2026). A report of the assessment shall be submitted to and approved by the LPA.

So as to mitigate against the plant noise from the proposed secondary mechanical ventilation in the rear of the proposal a minimum specification has been recommended in paragraph 9.1. The report has recommended that once confirmed the noise emissions from the proposed equipment should be calculated by an

appropriately qualified person to ensure that the limit levels are achieved. I recommend that this be conditioned.

Given the discrepancy between the NoiseAir and Nova assessments, Public Protection cannot fully discount the higher noise levels previously recorded at this location. Unless a compelling reason can be offered to discount the NoiseAir assessment and the higher NEC D rating, the TAN recommends refusal on the basis of noise levels. I recommend that the applicant be contacted and given the opportunity to provide a discussion as to the NoiseAir findings. Without compelling a compelling reason to discount that report this and in the event that Planning is minded to support this application any noise attenuation scheme should be designed to mitigate against the higher noise levels in the NoiseAir report.

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Head of Service Public Protection