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/2026/0537**

Date: 29-09-2026

Town and Country Planning Act 1990

Town and Country Planning (General Development Procedure) Order 1996

Re: P/2026/0537, LAND NORTH OF CROESFOEL COURT, WREXHAM ROAD, RHOSTYLLEN, WREXHAM, LL14 4DR

NEWID DEFNYDD TIR I SAFLE SIPSIWN A THEITHWYR TEULUOL Â 4 LLAIN / CHANGE OF USE OF LAND TO A 4 PITCH FAMILY GYPSY AND TRAVELLER SITE

RPT1 - REPORT REVIEW

Noise

Public Protection have reviewed the noise impact assessment prepared by E2 Consultants Ltd. The assessment relates to the proposed development at Land North of Crosfoel Court, Wrexham.

The site is located between the A483 and B5098, with road traffic noise identified as the dominant source. Whilst the assessment concludes that acceptable internal noise levels can be achieved through acoustic glazing and ventilation, insufficient evidence has been provided to demonstrate compliance with BS8233 internal criteria. Detailed internal noise calculations have not been submitted.

Of particular concern is the assessment of external amenity areas. The report acknowledges that areas of the site exceed the upper BS8233 guideline value of 55 dB LAeq,16hr, even after the introduction of a proposed 2m acoustic fence, and recommends further mitigation in the form of additional fencing around individual units or communal areas. This indicates that the scheme, as submitted, has not demonstrated acceptable outdoor amenity provision.

The report also lacks sufficient detail regarding the proposed acoustic barrier, including its specification, construction and acoustic performance, preventing independent verification of its effectiveness. Whilst reference is made to a 2m high fence with a density of 10kg/m³, no detailed specification or supporting information has been provided to demonstrate the level of attenuation assumed within the assessment.

Public Protection notes that the unattended noise monitoring was undertaken between 11:31am on 21 May 2026 and 10:09am on 22 May 2026, providing approximately 22 hours and 38 minutes of survey data. Whilst this captures both daytime and night-time periods, no justification has been provided to demonstrate that the monitoring period is representative of typical site conditions over the longer term. Given the site's location between the A483 and B5098, together with nearby commercial uses, noise levels are likely to fluctuate depending on traffic patterns, operational activities and other temporal factors. Public Protection is therefore not satisfied that a single monitoring period, without supporting evidence of representativeness, provides a sufficiently robust characterisation of the prevailing acoustic environment or demonstrates a true reflection of the site's long-term noise climate.

Public Protection also notes a mistake with the date of the report detailing it was carried out in 2025 however the measurements were carried out within 2026, this seems to be a typo. we have also identified a potential issue with the equipment calibration records provided within Appendix B. The calibration certificate for the acoustic calibrator appears to have expired prior to the survey being undertaken. As the validity and traceability of acoustic measurements are dependent upon appropriately calibrated equipment, this raises uncertainty regarding the reliability of the survey data and limits the ability to independently verify the assessment findings.

Recommendation

The applicant should provide:

- Detailed internal noise level predictions demonstrating compliance with BS8233 and BS3632.
- Revised noise contour plans demonstrating compliant external amenity areas.
- Full specification of all acoustic mitigation measures, including acoustic barriers and fencing.
- Details of the proposed ventilation strategy.
- Robust justification demonstrating that the monitoring period undertaken between 21 May 2026 and 22 May 2026 is representative of typical site conditions and the long-term acoustic environment
- Clarification regarding potential commercial/industrial noise impacts from nearby industrial area and, if necessary, a BS4142 assessment.

Based on the information submitted, Public Protection cannot be satisfied that future occupiers will achieve an acceptable standard of residential amenity and therefore recommends that further information is provided before the application can be supported.

Air Quality

Public Protection has reviewed the Air Quality Assessment Report prepared by Rappor Consultants Limited in support of the proposed development at Land North of Croesfoel Court, Rhostyllen.

The assessment identifies the A483 as the principal source of air pollution affecting the site, with traffic flows reported to be approximately 54,333 vehicles per day. The proposed residential pitches are located in close proximity to this strategic road network.

Public Protection notes that the assessment has not been supported by site-specific air quality monitoring or detailed dispersion modelling. Instead, the conclusions are based on data obtained from existing monitoring locations, including the Victoria Road AURN monitoring station, diffusion tube monitoring undertaken at monitoring location 30, and background monitoring data from the Wrexham Chirk Community Hospital AURN.

Whilst the assessment considers diffusion tube monitoring location 30 to be representative of conditions at the site, insufficient justification has been provided to demonstrate that this monitoring location adequately reflects air quality conditions at the proposed residential receptors. Public Protection notes that the proposed development appears to be located significantly closer to the A483 than monitoring location 30. Given that pollutant concentrations generally reduce with increasing distance from a significant road traffic source, it cannot be assumed that monitoring undertaken at a greater separation distance is representative of conditions experienced by future occupiers of the development.

Similarly, the Victoria Road AURN and Wrexham Chirk Community Hospital AURN monitoring stations are located some distance from the application site and may not accurately reflect localised pollutant concentrations adjacent to the A483. Whilst these monitoring locations provide useful contextual information regarding background and regional air quality, further explanation is required to demonstrate their applicability to the site-specific assessment.

Given the site's proximity to a heavily trafficked dual carriageway, Public Protection is not fully satisfied that the submitted assessment has robustly demonstrated that air quality at the proposed receptor locations is adequately characterised by the monitoring data relied upon within the report. Additional justification should therefore be provided to demonstrate that the monitoring locations utilised are representative of the proposed residential receptors, particularly those situated closest to the A483.

Recommendation

The applicant should provide:

- Further justification demonstrating that the monitoring locations used within the assessment are representative of the proposed residential receptor locations.
- Clarification of the separation distances between the monitoring locations, the A483, and the proposed residential pitches.
- Confirmation that air quality conditions at the receptors closest to the A483 have been appropriately assessed.
- Where necessary, additional site-specific assessment or modelling to demonstrate that future occupiers will not be exposed to unacceptable levels of traffic-related air pollutants.

Based on the information submitted, Public Protection considers that further clarification is required regarding the representativeness of the monitoring data used within the assessment before the air quality conclusions can be fully accepted

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Head of Service Public Protection