

ODOUR ASSESSMENT

on behalf of

GLADMAN DEVELOPMENTS LTD

for

STORRIDGE ROAD, WESTBURY

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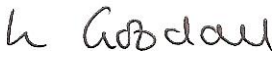
Summary

An odour assessment has been undertaken to assess the potential odour impact from multiple sources on a proposed residential development at Storrige Road, Westbury.

Potential odour emissions from businesses within 1 km of the site have been assessed in accordance with the FIDOL methodology set out in the Institute of Air Quality Management’s ‘Guidance on the assessment of odour for planning’. Northacre Renewable Energy Ltd has received planning approval for an Energy-from-Waste facility. To evaluate the potential future odour risk from this installation, a review was undertaken of the planning application documents, including the submitted odour assessment, together with the appeal decision, which imposed conditions requiring the implementation of additional mitigation measures.

The assessment concluded that the level of odour associated with the potential odour sources in the local area would be insignificant to the proposed development.

There is, therefore, no reason for this application to be refused on the grounds of odour.

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1	8 December 2025	First issue	MH
2	17 December 2025	Update to include reference to the Welton Bibby Baron Ltd planning application for the proposed extension of the existing warehouse.	MH

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1 Introduction

- 1.1 Miller Goodall Ltd has been instructed to prepare an odour assessment to accompany an outline planning application for a proposed residential development at Storridge Road, Westbury. The site lies within the administrative boundary of Wiltshire Council (WC).
- 1.2 A FIDOL odour assessment for several existing potential odour sources within a kilometre of the proposed development has been completed in accordance with the methodology contained in the Institute of Air Quality Management's "Guidance on the assessment of odour for planning"¹. A review has also been undertaken of potential odorous developments in the vicinity of the development.

2 Site Description

- 2.1 The proposed development occupies vacant land positioned between the West Wiltshire Trading Estate to the west and residential properties along Hawkeridge Park and the B3097 to the east. To the northeast, the site is bordered by open fields. Residential dwellings are located to the southwest along Storridge Road.
- 2.2 Several potential odour sources are located in the vicinity of the proposed development. The Westbury Sewage Works lies approximately 610 m to the east, while the West Wilts Trading Estate, extends to the north, west, and south of the site.
- 2.3 The site location, along with potential odour sources, are shown in **Appendix A**.

3 Proposed Development

- 3.1 The proposed development is the demolition of numbers 5 and 6 Storridge Road and the erection of up to 165 dwellings with public open space, landscaping, a sustainable drainage system and a vehicular access point from Storridge Road. All matters are reserved except for means of access.

¹ Institute of Air Quality Management, 2024. Guidance on the assessment of odour for planning.

4 Policy Context

4.1 National Planning Policy Framework

- 4.1.1 The National Planning Policy Framework^[2] does not specifically mention odour, but it does refer to air and pollution. Paragraph 187 states:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.”

- 4.1.2 Paragraph 200 states:

- 4.1.3 *“Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.”*

- 4.1.4 Paragraph 201 states:

“The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular

² Ministry of Housing, Communities and Local Government, 2024. National Planning Policy Framework

development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.”

4.1.5 The role of planning is to ensure that new developments that are capable of creating odour do not cause a significant adverse effect in the local area or impact upon existing sensitive uses nearby. Additionally, the planning system also seeks to ensure sensitive uses introduced at the development would not be adversely affected by existing odorous sources and/or that undue restrictions are not placed on existing odorous businesses that may have operated up to that point without issue.

5 Methodology

5.1 Data Sources

5.1.1 The odour assessment has been undertaken and prepared with reference to information from several sources, as detailed in **Table 1**.

Table 1: Key Information Sources

Data Source	Reference
Wiltshire Council (WC)	WC (February 2025) Public Register of Part B and A2 permits downloaded from https://www.wiltshire.gov.uk/article/1126/Environmental-Permits-including-mobile-plant
Environment Agency (EA)	EA Public Register Search via https://environment.data.gov.uk/public-register/view/search-all
Institute of Air Quality Management (IAQM)	IAQM (2024) Guidance on the assessment of odour for planning
Ministry of Housing, Communities & Local Government	National Planning Policy Framework (NPPF), December 2023
WindFinder.com	Wind rose

5.2 FIDOL Odour Assessment

- 5.2.1 The FIDOL methodology detailed within IAQM Odour Guidance¹ has been used to inform this assessment.
- 5.2.2 Before an adverse effect (such as disamenity, annoyance, nuisance or complaints) can occur, there must be odour exposure. For odour exposure to occur all three links in the source-pathway-receptor chain must be present: an emission source (a means for the odour to get into the atmosphere); a pathway (for the odour to travel through the air to locations off-site); and the presence of receptors (people) that could experience an adverse effect, noting that people vary in their sensitivities to odour.
- 5.2.3 The scale of exposure (the impact) is determined by the parameters collectively known as the FIDO factors (Frequency, Intensity, Duration and Offensiveness); these are described in **Table 2**. The magnitude of the effect experienced is determined by the scale of exposure (FIDO) and the sensitivity of the receptor (L, denoting the location, which is often taken to be a surrogate for the sensitivity and incorporates the social and psychological factors that can be expected for a given community).

Table 2: FIDO Parameters

Factor	Description of Factor
Frequency	How often an individual is exposed to odour
Intensity	The individual's perception of the strength of the odour
Duration	The overall duration that individuals are exposed to an odour over time
Odour Unpleasantness	Odour unpleasantness describes the character of an odour as it relates to the 'hedonic tone' (which may be pleasant, neutral or unpleasant) at a given odour concentration/intensity. This can be measured in the laboratory as the hedonic tone, and when measured by the standard method and expressed on a standard nine-point scale it is termed the hedonic score.
Location	The type of land use and nature of human activities in the vicinity of an odour source. Tolerance and expectation of the receptor. The 'Location' factor can be considered to encompass the receptor characteristics, receptor sensitivity, and socio-economic factors.

5.2.4 The risk of the impact of the odour at a receptor can be estimated using a basic relationship as identified below:

$$\text{Effect} \approx \text{Dose} \times \text{Response}$$

5.2.5 The dose is the likely impact of the odour as a result of the odour exposure and the response is the result of the sensitivity of the receiving environment.

5.2.6 The key issues impacting on the effect of the odour include:

- Magnitude of the odour;
- Effectiveness of the pathway for the odour to be received; and
- The sensitivity of the receptor.

5.2.7 The IAQM Odour Assessment Methodology which has been followed during the assessment is shown in **Appendix B**. Odour risks deemed 'negligible' or 'slight adverse' are considered to be insignificant.

6 Wiltshire Council Consultation

6.1 A telephone call, supported by screenshare, was held between Nadine Cahill, Environmental Health Officer of WC, and Melody Horan of Miller Goodall Ltd³.

6.2 Odour complaints recorded between November 2020 and November 2025 were reviewed. There were eight complaints related to Northacre Resource Recovery Centre, with some originating from the same complainant. It should be noted that the majority of complaints concerning the Northacre Resource Recovery Centre are directed to the Environment Agency (EA) rather than WC, as the installation is regulated under an EA environmental permit. This matter is discussed further in **Section 7.1**.

³ Date of telephone call: 3rd of December 2025.

- 6.3 In addition to the Northacre Resource Recovery Centre complaints, there were three other complaints relating to other odour sources, two of which were for the same location. One odour complaint was received in relation to Cory Way⁴. The complainant was advised to contact the EA regarding the specific business involved, which was not identified as the Northacre Resource Recovery Centre; however, no further details were available. Two complaints were received from the same individual concerning odour observed on Headquarters Road, which was for a localised issue⁵.
- 6.4 During the call, the location of the proposed development site was reviewed alongside the potential odour sources identified by Miller Goodall Ltd. This was facilitated with a screenshare to view the map. The proposed assessment methodology was also discussed.

7 Assessment of Odour on the Development

7.1 Source Odour Potential

- 7.1.1 There are several potential odour sources within 1 km of the proposed development site, which have been assessed using the FIDOL methodology. Potential odour sources have been identified through a site visit⁶, Google Street View, and a search for environmental permits issued by the EA and WC. The locations of these potential odour sources in relation to the development are shown in **Appendix A**. The potential odour sources have been listed in order of distance from the site, with an overview of their operations and the potential odour associated with them.
- 7.1.2 The source odour potential of each has been determined using **Table B1** in **Appendix B** for each odour source and is presented in **Table 3**.
- 7.1.3 Northacre Renewable Energy Ltd has been granted planning permission for an Energy-from-Waste facility (Appeal Ref: APP/Y3940/W/22/3302008). The approved scheme was subject to an air quality assessment, which included detailed odour modelling. The relevant planning documents will be reviewed in **Section 8**. This will allow the evaluation of potential odour impacts associated with the permitted facility, rather than applying the FIDOL framework to assess odour risk. Consequently, Northacre Renewable Energy Ltd is not discussed further in **Section 7**.

⁴ Complaint received on the 26th of June 2025.

⁵ Complaints received on the 28th of January 2025 and the 14th of July 2025.

⁶ Miller Goodall Ltd visited the surrounding area, including West Wilts Trading Estate on the 25th of November 2025.

SPC Europe Ltd

- 7.1.4 SPC Europe Ltd is approximately 35 m north of the proposed development site. A photograph of their building is provided in **Appendix C**.
- 7.1.5 The company operates under a Part B environmental permit (reference WC/EP246) and is regulated using Process Guidance Note 6/28(11) Statutory guidance for rubber, Revised: June 2014, issued by DEFRA⁷.
- 7.1.6 SPC Europe Ltd specialises in product development, manufacturing and selling of rubber. In rubber manufacturing, odour may arise from the receipt, handling and storage of organic solvents and organic solvent-containing liquids⁷. PG6/28 states that *"The overall aim should be that all emissions are free from offensive odour outside the site boundary, as perceived by the regulator"*⁷.
- 7.1.7 The presence of a Part B environmental permit confirms that odour management at SPC Europe Ltd is formally regulated. Mitigation measures are required under the environmental permit to minimise odour emissions associated with these activities. In operating in accordance with the environmental permit, mitigation measures at these premises should be effective. Best Available Techniques (BAT) include the use of enclosed mixing and storage vessels for organic solvents and materials containing organic solvents⁷. As shown in **Appendix C**, the SPC building is fitted with stacks. The environmental permit ensures that BAT is used in relation to solvent use and associated emissions are controlled to prevent nuisance beyond the site boundary.
- 7.1.8 As the installation operates under a Part B environmental permit and because BAT includes the enclosed processes for use of potentially odorous material, the odour source potential for SPC Europe is, therefore, considered to be **small**.

Nova Motorsport

- 7.1.9 Nova Motorsport is approximately 70 m northwest of the proposed development site and specialises in the design, supply, and support of high-performance motorsport components, including rubber tyres and tubes. Odours may arise from manufacturing rubber; however, the company's Portugal facilities exclusively undertake the company's manufacturing and engineering activities. The Westbury headquarters undertakes commercial, technical, warehouse,

⁷ Defra (2014) Process Guidance Note 6/28(11) Statutory guidance for rubber

distribution, and trackside operations⁸. Therefore, the Westbury Nova Motorsport headquarters is not expected to generate odour emissions and will not be assessed further. As it is not a potential odour source, it is not included in **Appendix A**.

Associated Labs

- 7.1.10 Associated Labs is approximately 75 m west of the proposed development site.
- 7.1.11 There is no evidence of an environmental permit for this site on the EA or WC registers. This suggests that the facility is either non-manufacturing (e.g. offices, labs, or service functions) or that its activities do not fall under the Environmental Permitting (England and Wales) Regulations 2016 (as amended)
- 7.1.12 Associated Labs is listed as a dental laboratory on Google Maps. There is no further information online. As a dental laboratory, it is likely involved in the fabrication of dental appliances using resins, adhesives, and metals. These processes can produce minor chemical odours indoors, but any minor odour emissions are expected to be mitigated through local extraction and ventilation systems. Therefore, Associated Labs is not expected to generate external odour emissions and will not be assessed further. As it is not considered a potential odour source, it is not included in **Appendix A**.

Savencia Fromage & Dairy UK

- 7.1.13 Savencia Fromage & Dairy UK is located approximately 80 m southwest of the proposed development site.
- 7.1.14 The site is authorised under a historic water discharge registration (SW/021417/001, issued 30 June 1964), which permits discharges associated with dairy operations to controlled waters⁹. This registration confirms effluent handling but does not constitute a full environmental permit. No Part A1, A2, or Part B environmental permits are listed for this site on the EA or WC public registers.
- 7.1.15 Savencia Fromage & Dairy UK is a dairy processing and distribution facility. As a milk processing plant, potential odours could come from milk residues, whey drying, and effluent treatment. Sour milk and whey can produce unpleasant odours if not promptly managed, while biological effluent treatment may release ammonia or fatty acid odours. Waste sludge or spoiled dairy products can

⁸ <https://novamotorsport.com/careers/>

⁹ https://environment.data.gov.uk/public-register/water-discharges/registration/SW-021417-001?__pageState=result-all

also be odorous if storage is inadequate. Cleaning chemicals used in CIP (clean-in-place) systems may be noticeable indoors but rarely contribute to off-site odour.

7.1.16 Effective housekeeping, effluent management, and waste handling are critical to ensuring odour does not extend beyond the site boundary. In the absence of an environmental permit under the PPC regime, statutory nuisance controls under the Environmental Protection Act 1990 apply.

7.1.17 The odour source potential for Savencia Fromage & Dairy UK is, therefore, considered to be **small**.

Steer Westbury

7.1.18 Steer Westbury is approximately 150 m southwest of the proposed development site.

7.1.19 There is no evidence of an environmental permit for Steer Westbury on the WC registers. This indicates that the scale of solvent use is below the threshold requiring an environmental permit.

7.1.20 Steer Westbury offers vehicle body repairs, including spray painting. Spray painting activities can involve the use of solvent-based paints and thinners, which have the potential to generate odorous emissions. However, such operations are typically carried out within enclosed spray booths fitted with extraction and filtration systems. Following a telephone discussion with Steer Westbury, it was confirmed that the company utilises water-based paints for colour application, together with a clear lacquer to provide durability to the finish¹⁰. The clear lacquer formulation comprises a solvent component together with a two-part hardener. In the absence of an environmental permit under the PPC regime, statutory nuisance controls under the Environmental Protection Act 1990 apply.

7.1.21 The odour source potential for Steer Westbury is, therefore, considered to be **small**.

Welton Bibby Baron

7.1.22 Welton Bibby Baron is approximately 170 m west of the proposed development site. A photograph of their site is provided in **Appendix C**.

7.1.23 The company operates under a Part B environmental permit (reference WC/EP270) and is regulated using Process Guidance Note 6/18 Statutory guidance for paper coating processes¹¹.

¹⁰ Telephone conversation between Miller Goodall Ltd and Steer Westbury on 8th December 2025.

¹¹ DEFRA (2010) Process Guidance Note 6/18: Paper Coating Processes – Draft Version.

- 7.1.24 Welton Bibby Baron manufactures packaging. Odour emissions associated with manufacturing packaging are typically linked to the use of solvent-based inks, coatings, and adhesives during printing and finishing. These substances can generate noticeable odours if not adequately controlled. However, their environmental permit only relates to the coating of paper packaging. PG 6/18 states that “The overall aim should be that all emissions are free from offensive odour outside the site boundary, as perceived by the regulator”¹¹.
- 7.1.25 Welton Bibby Baron Ltd has submitted a planning application (reference PL/2025/06989) for the extension of the existing warehouse. The proposed extension would create two additional production halls to support business growth. The application does not indicate any change to the type of permit under which the company currently operates.
- 7.1.26 Permitted installations are required to implement BAT, including enclosed processes, extraction, and abatement systems, to minimise odour release. As shown in **Appendix C**, Welton Bibby Baron houses a large stack well above roof level. Given the presence of a Part B environmental permit, odour management at Welton Bibby & Baron is formally regulated. The environmental permit ensures that solvent use and associated emissions are controlled to prevent nuisance beyond the site boundary.
- 7.1.27 The odour source potential for Welton Bibby Baron, including if the extension is approved by WC, is, therefore, considered to be **medium**.

Absolute Solvents Ltd

- 7.1.28 Absolute Solvents Ltd is approximately 180 m southwest of the proposed development site.
- 7.1.29 The business is permitted by the EA; Environmental permit number: KP3832SK, Permit status: effective¹².
- 7.1.30 Absolute Solvents Ltd is a solvent recovery and recycling company, specialising in reclaiming and re-supplying industrial solvents such as alcohols, hydrocarbons, ketones, paint thinners, and chlorinated solvents¹³. Organic solvents are volatile and can produce odours if not properly contained.

¹² https://environment.data.gov.uk/public-register/industrial-installations/registration/EPR-KP3832SK?__pageState=result-all

¹³ <https://www.absolutesolvents.co.uk/solvent-recovery>

7.1.31 An odour management plan, approved by the EA, is required under the environmental permit to minimise odour emissions associated with these activities.

7.1.32 Environmental permit condition 3.3.1 states¹⁴:

"Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour."

7.1.33 Environmental permit condition 3.3.2 states¹⁵:

"The operator shall:

(a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;

(b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency."

7.1.34 The odour source potential for Absolute Solvents Ltd is, therefore, considered to be **medium**.

Spectra

7.1.35 Spectra is approximately 200 m northwest of the proposed development site. A photograph of their building is provided in **Appendix C**.

7.1.36 There is no evidence of an environmental permit for Spectra on the EA or WC registers. This indicates that the scale of solvent use is below the threshold requiring an environmental permit.

7.1.37 Spectra offers vehicle body repairs, including spray painting. As discussed in relation to Steer Westbury, spray painting activities can involve the use of solvent-based paints and thinners, which

¹⁴ https://assets.publishing.service.gov.uk/media/66e007d361f4a22cad32826c/Application_Variation_V005_Notice_Issued_-_29082024.pdf

¹⁵ https://assets.publishing.service.gov.uk/media/66e007d361f4a22cad32826c/Application_Variation_V005_Notice_Issued_-_29082024.pdf

have the potential to generate odorous emissions. However, odour can be mitigated during such operations. As shown in **Appendix C**, Spectra houses two large stacks well above roof level.

7.1.38 In the absence of an environmental permit under the PPC regime, statutory nuisance controls under the Environmental Protection Act 1990 apply.

7.1.39 The odour source potential for Spectra is, therefore, considered to be **small**.

ALH Systems Ltd

7.1.40 ALH Systems Ltd is approximately 310 m west of the proposed development site.

7.1.41 The company holds a Part B environmental permit (reference WC/EP257) and is regulated using Process Guidance Note 6/42(13) Statutory guidance for bitumen processes, issued by Defra¹⁶.

7.1.42 ALH Systems Ltd is an industrial manufacturer specialising in resins, sealants and mechanical products for utilities, electronics and rail¹⁷. Certain products involve the heating, mixing, and application of bitumen or tar-based formulations. Bitumen and tar-based formulations, when heated and mixed, can release strong, distinctive odours.

7.1.43 PG6/42 states that *"The overall aim should be that all emissions are free from offensive odour outside the site boundary, as perceived by the regulator"*¹⁶. Under PG6/42 (13), operators are required to implement BAT to mitigate odour, including enclosed mixing systems, temperature control, extraction, and abatement equipment. The presence of a Part B environmental permit ensures that odour management is formally regulated.

7.1.44 The odour source potential for ALH Systems Ltd is, therefore, considered to be **medium**.

McFarlane Packaging

7.1.45 McFarlane Packaging is approximately 400 m northwest of the proposed development site. A photograph of their building is provided in **Appendix C**.

7.1.46 Searches of the Environment Agency (EA) and WC public registers confirm that no Part A1, A2, or Part B environmental permits are associated with Macfarlane Packaging in Westbury. This

¹⁶ Defra (2013) Process Guidance Note 6/42(13) Statutory guidance for bitumen processes

¹⁷ <https://www.alh-systems.co.uk/>

indicates that the scale and type of operations do not exceed regulatory thresholds for solvent use or other odour-relevant activities.

7.1.47 McFarlane Packaging designs and manufactures protective packaging. Odour sources can include: printing and coating processes (if solvent-based inks or adhesives are used), plastics conversion (minor odours from heated polymers), and waste handling (storage of off-cuts, inks, or adhesives). During the site visit⁶, a large stack was visible at McFarlane Packaging, as shown in **Appendix C**.

7.1.48 In the absence of a permit under the PPC regime, statutory nuisance controls under the Environmental Protection Act 1990 apply.

7.1.49 The odour source potential for McFarlane Packaging is, therefore, considered to be **small**.

Arla Westbury Dairy

7.1.50 Arla Westbury Dairy is approximately 410 m southwest of the proposed development. A photograph of their building is provided in **Appendix C**.

7.1.51 It is permitted by the EA; Environmental permit number: EPR/QP3930JL, Permit status: effective¹⁸. The EA has published one EPR compliance assessment report for this installation¹⁸, dated August 2025. Regarding odour, the report stated, "*The new 1700m3 balance tank with lid for odour containment is in place as is the screening tower which is currently being fitted out.*" As well as "*No odour or noise issues were identified during the inspection.*" The report concluded that there were no non-compliances identified during the inspection.

7.1.52 As it is a milk processing plant, potential odours could come from milk residues, whey drying, and effluent treatment.

7.1.53 An odour management plan, approved by the EA, is required under the environmental permit to minimise odour emissions associated with these activities.

¹⁸ [View registration EPR/QP3930JL](#)

7.1.54 Environmental permit condition 3.3.1 states¹⁹:

"Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour."

7.1.55 Environmental permit condition 3.3.2 states¹⁹:

The operator shall:

"(a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;

(b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency."

7.1.56 As shown in **Appendix C**, the Arla Westbury Dairy building is fitted with stacks extending above roof height.

7.1.57 The odour source potential for Arla Westbury Dairy is, therefore, considered to be **medium**.

M G Cannon

7.1.58 M G Cannon is approximately 420 m northwest of the proposed development site. A photograph of their building is provided in **Appendix C**.

7.1.59 The company operates under a Part B environmental permit (reference WC/EP337) and is regulated using Process Guidance Note 6/34(11) Statutory guidance for re-spraying of road vehicles, Revised: July 2013, issued by DEFRA²⁰.

7.1.60 M G Cannon offers vehicle body repairs, including spray painting. Odour may arise from the receipt, handling and storage of organic solvents and organic solvent-containing liquids²⁰. Vehicle respraying activities have a relatively low odour potential because they involve small-scale,

¹⁹ https://assets.publishing.service.gov.uk/media/659693c7d7737c000df33429/Application_Variation_Notice_Issued_-_19122023.pdf

²⁰ Defra (2013) Process Guidance Note 6/34(11) Statutory guidance for re-spraying of road vehicles

controlled processes. The paints used are subject to strict VOC content limits under the EU Paints Directive, and operators must implement BAT such as enclosed spray booths under negative pressure, high-efficiency spray guns, and enclosed gun-cleaning systems. These measures significantly reduce the release of solvent vapours and odorous compounds into the surrounding environment. Additionally, proper storage of paints and solvents, along with containment of waste materials, further minimises fugitive emissions.

7.1.61 The regulatory framework reflects this low environmental risk by classifying vehicle respraying as a “reduced fee activity” under the Local Authority Pollution Prevention and Control (LAPPC) charging scheme. This designation acknowledges that the odour and overall pollution potential are limited, compliance requirements are straightforward, and inspection effort is minimal compared to larger coating or chemical processes. As a result, operators pay substantially lower application and subsistence fees, reinforcing the view that vehicle respraying poses a small odour impact when managed according to prescribed standards.

7.1.62 Mitigation measures are required under the environmental permit to minimise odour emissions associated with these activities. Statutory guidance PG6/34 states that “*There shall be no offensive odour beyond the site boundary, as perceived by the regulator*”²⁰. In accordance with the environmental permit, mitigation measures at these premises should be effective. As shown in **Appendix C**, the M G Cannon building is fitted with stacks.

7.1.63 The odour source potential for M G Cannon is, therefore, considered to be **small**.

Northacre Resource Recovery Centre

7.1.64 Northacre Resource Recovery Centre is approximately 480 m southwest of the proposed development site, at its closest point.

7.1.65 It is permitted by the EA; Environmental permit number: EPR/LP349IEE, Permit status: effective²¹.

7.1.66 There is the potential for odour associated with works at Northacre Resource Recovery Centre, which processes 60,000 tonnes of municipal waste each year using Mechanical Biological Treatment (MBT) technology²². MBT technology converts municipal solid waste into Solid Recovered Fuel (SRF), which is then used in renewable energy plants. Northacre Resource Recovery

²¹ https://environment.data.gov.uk/public-register/industrial-installations/registration/EPR-LP349IEE?__pageState=result-all

²² <https://www.northacrerrc.co.uk/>

Centre has an odour management plan, which is reviewed annually. The MBT process is carried out inside a sealed building, which is maintained under negative air pressure to avoid the release of odours to the environment. Processed air from the building is filtered prior to release into the atmosphere²³.

7.1.67 Environmental permit condition 3.3.1 states²⁴:

"Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour..."

7.1.68 Environmental permit condition 3.3.2 states²⁴:

"The operator shall: (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;

(b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency."

7.1.69 The EA has published three EPR compliance assessment reports for this installation²¹, dated July 2025, August 2025 and September 2025. During this period, the EA received multiple odour complaints relating to the site. The compliance reports note that not all complaints were substantiated by EA officers. Each compliance report records a *"minor non-compliance against permit condition 3.3.1"* on the basis that odour was detected beyond the site boundary.

7.1.70 In July and September, EA officers detected low levels of intermittent odour in residential areas. In August, odour levels detected in residential areas were typically rated as very faint/faint in intensity by the EA officers. However, during odour observations on 5 August, odour intensity was rated as distinct in some residential areas. The operator explained that this elevated odour coincided with a three-hour period when the deodorising misters were switched off for maintenance.

²³ <https://www.northacrerrec.co.uk/technology/>

²⁴ https://assets.publishing.service.gov.uk/media/5fbce691d3bf7f572d8f46ad/Variation_Notice_LP3491EE-V008.pdf

- 7.1.71 In response, the operator has purchased additional deodorising equipment, including a unit specifically designated to cover skips awaiting transport. Alongside these new deodorisers, further mitigation measures are planned to ensure ongoing compliance with environmental permit requirements.

The odour source potential for Northacre Resource Recovery Centre is, therefore, considered to be **medium**.

Westbury Water Recycling Centre Works

- 7.1.72 Westbury Water Recycling Centre Works is approximately 650 m east of the proposed development site.

- 7.1.73 It is permitted by the EA; Environmental permit number: SW/101652/007²⁵.

- 7.1.74 Westbury Water Recycling Centre Works is a Wastewater Treatment Works (WwTW) facility. IAQM guidance¹ states that odours from sewage treatment works plant operating normally, i.e. non-septic conditions, would not be expected to be at the 'most offensive' end of the spectrum and can be considered on par with 'moderately offensive' odours such as intensive livestock rearing.

- 7.1.75 The odour source potential for Westbury Water Recycling Centre Works is, therefore, considered to be **medium**.

Stairway Joinery

- 7.1.76 Stairway Joinery is approximately 730 m northwest of the proposed development site.

- 7.1.77 The company operates under a Part B environmental permit (reference WC/EP336) and is regulated using Process Guidance Note PG 6/02(12) Statutory guidance for the working of timber and manufacture of wood-based products, issued by DEFRA²⁶. PG 6/02(12) regulates emissions primarily associated with wood dust and particulates generated during timber cutting, sanding, and machining operations. Statutory guidance PG 6/02 states that "Records shall be kept of operator inspections, including those for visible and odorous emissions"²⁶. Otherwise, odour is not mentioned in Statutory guidance PG 6/02.

²⁵ https://environment.data.gov.uk/public-register/water-discharges/registration/SW-101652-007?__pageState=result-water-discharge-consents

²⁶ DEFRA (2012) Process Guidance Note 6/02: Statutory guidance for the working of timber and manufacture of wood-based products.

7.1.78 Stairway Joinery specialises in staircase joinery. Potential odour sources at the installation are limited. Timber processing itself is not typically associated with significant odour emissions; however, minor odours may arise from: storage of timber and wood-based products (natural resinous odours), use of adhesives or finishes and waste handling (wood off-cuts, sawdust).

7.1.79 The odour source potential for Stairway Joinery is, therefore, considered to be **small**.

AJR Auto Body Repairs

7.1.80 AJR Auto Body Repairs is approximately 750 m northwest of the proposed development site.

7.1.81 There is no evidence of an environmental permit for AJR Auto Body Repairs on the WC registers. This indicates that the scale of solvent use is below the threshold requiring an environmental permit.

7.1.82 AJR Auto Body Repairs offers vehicle body repairs, including spray painting. As discussed, spray painting activities can involve the use of solvent-based paints and thinners, which have the potential to generate odorous emissions. However, these operations can be mitigated to minimise odour beyond the site boundary. In the absence of an environmental permit under the PPC regime, statutory nuisance controls under the Environmental Protection Act 1990 apply.

7.1.83 The odour source potential for AJR Auto Body Repairs is, therefore, considered to be **small**.

Waste Matters Ltd

7.1.84 Waste Matters Ltd is approximately 790 m southwest of the proposed development site.

7.1.85 It is permitted by the EA; Environmental permit number: EPR/CP3331SC, Permit status: effective²⁷.

7.1.86 Waste Matters Ltd is a hazardous waste management service. Waste Matters Ltd. collects and transfers hazardous and non-hazardous wastes from various industrial processes to the installation. The site is permitted to accept up to 5,000 tonnes of waste per annum²⁸. Potential odour sources at the installation include the handling, storage, and transfer of waste materials, particularly hazardous wastes that may contain volatile organic compounds (VOCs) or other

²⁷ https://environment.data.gov.uk/public-register/industrial-installations/registration/EPR-CP3331SC?__pageState=result-all

²⁸ https://assets.publishing.service.gov.uk/media/6716418c4a6b12291ed997eb/Permit_Review_V006_Permit_Notice_-_14102024.pdf

odorous constituents. Odour generation is most likely during loading/unloading operations, open storage, or waste treatment activities.

7.1.87 To mitigate these risks, the operator is required to implement an odour management plan and apply BAT, such as enclosed storage and transfer systems, regular inspection and maintenance of containers and skips, use of deodorising sprays or covers for waste awaiting transport and prompt removal of odorous wastes from the site.

7.1.88 Environmental permit condition 3.3.1 states²⁸:

"Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour."

7.1.89 Environmental permit condition 3.3.2 states²⁸:

"The operator shall:

(a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;

(b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency."

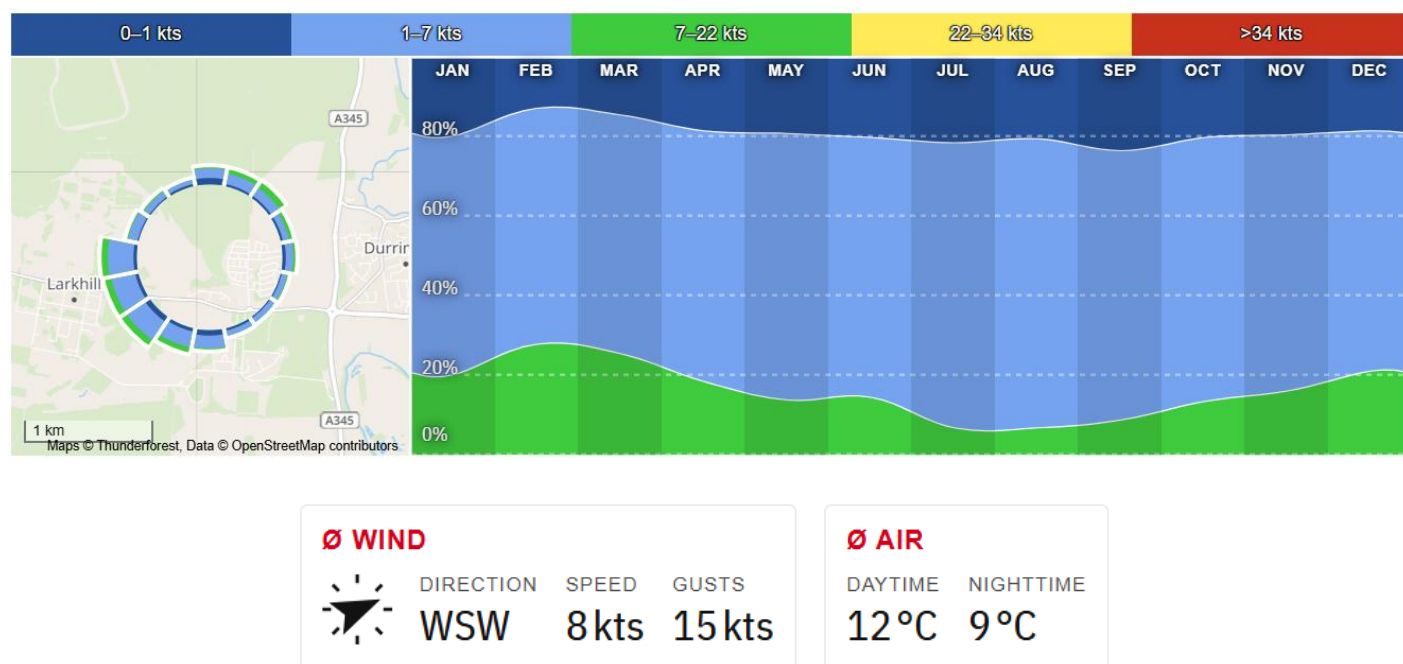
7.1.90 The presence of an effective EA environmental permit provides assurance that odour emissions are formally regulated and subject to compliance monitoring.

7.1.91 The odour source potential for Waste Matters Ltd is, therefore, considered to be **medium**.

7.2 Pathway Effectiveness

7.2.1 **Figure 1** shows wind roses from the closest station, Larkhill²⁹. The dominant wind direction is west-southwest to east-northeast.

²⁹ Wind rose taken from [<https://www.windfinder.com/windstatistics/larkhill>] . The statistics are based on observations between 05/2010 to 10/2025.

Figure 1: Meteorological Data and Wind Rose Summary from Larkhill (05/2010 to 10/2025)

7.2.2 **Table B2 in Appendix B** was used to determine the pathway effectiveness of each odour source on the proposed development

7.2.3 The pathway effectiveness of each potential odour source was determined using **Table B1 in Appendix B** and is shown in **Table 3**. The pathway effectiveness was determined by considering the distance and prevailing wind directions from the odour source to the proposed development. Buffer zones of <100 m, 100 – 500 m and 500 m – 1 km are shown in **Appendix A**, to provide visual assistance to the reader in the distances between the proposed development and potential odour sources.

7.3 Risk of Odour Exposure (Impact)

7.3.1 The odour source potential and pathway effectiveness are combined to produce the risk of odour exposure (impact). The risk of odour impact on the proposed development has been determined for each potential odour source using the matrix in **Table B3 in Appendix B** and is shown in **Table 3**.

7.4 Receptor Sensitivity

7.4.1 Using **Table B4 in Appendix B**, the receptor sensitivity can be described as **highly sensitive** because the proposed development is residential in use; therefore, users can reasonably expect a high level of amenity.

7.5 Magnitude of Odour Impact

7.5.1 The final magnitude of odour impact is defined by combining the risk of odour exposure (impact) and receptor sensitivity. Using the matrix in **Table B5** in **Appendix B**, the magnitude of odour impact has been determined for each potential odour source using its assigned risk of odour exposure on highly sensitive receptors. The magnitude of odour impact is shown in **Table 3**.

Table 3: Magnitude of Odour Impact

Odour Source	Source Odour Potential	Pathway Effectiveness	Risk of Odour Exposure	Magnitude of Odour Impact
SPC Europe Ltd	Small	High	Low Risk	Slight Adverse Effect
Savencia Fromage & Dairy UK	Small	High	Low Risk	Slight Adverse Effect
Steer Westbury	Small	High	Low Risk	Slight Adverse Effect
Welton Bibby Baron	Medium	Moderate	Low Risk	Slight Adverse Effect
Absolute Solvents Ltd	Medium	Moderate	Low Risk	Slight Adverse Effect
Spectra	Small	Moderate	Negligible Risk	Negligible Effect
ALH Systems Ltd	Medium	Moderate	Low Risk	Slight Adverse Effect
Macfarlane Packaging	Small	Ineffective	Negligible Risk	Negligible Effect
Arla Westbury Dairy	Medium	Moderate	Low Risk	Slight Adverse Effect
M G Cannon	Small	Ineffective	Negligible Risk	Negligible Effect
Northacre Resource Recovery Centre	Medium	Moderate	Low Risk	Slight Adverse Effect
Westbury Water Recycling Centre Works	Medium	Moderate	Low Risk	Slight Adverse Effect
Stairway Joinery	Small	Ineffective	Negligible Risk	Negligible Effect
AJR Auto Body Repairs	Small	Ineffective	Negligible Risk	Negligible Effect
Waste Matters Ltd	Medium	Ineffective	Negligible Risk	Negligible Effect

7.5.2 All of the identified odour sources have been assessed and are deemed to have either a negligible or slight adverse effect on the proposed development site. The IAQM guidance considers negligible and slight adverse effects to be insignificant. Therefore, the proposed development is not expected to be significantly affected by potentially odorous operations within the surrounding area.

8 Northacre Renewable Energy Ltd

- 8.1 Northacre Renewable Energy Ltd has been granted planning permission for an Energy-from-Waste facility (Appeal Ref: APP/Y3940/W/22/3302008). The site is located approximately 320 m southwest of the proposed development site and has not yet been constructed.
- 8.2 It is permitted by the EA; Environmental permit number: EPR/CP3803LV, Permit status: effective³⁰. Environmental permit condition 3.4 states³¹:

"Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

The operator shall:

(a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;

(b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency."

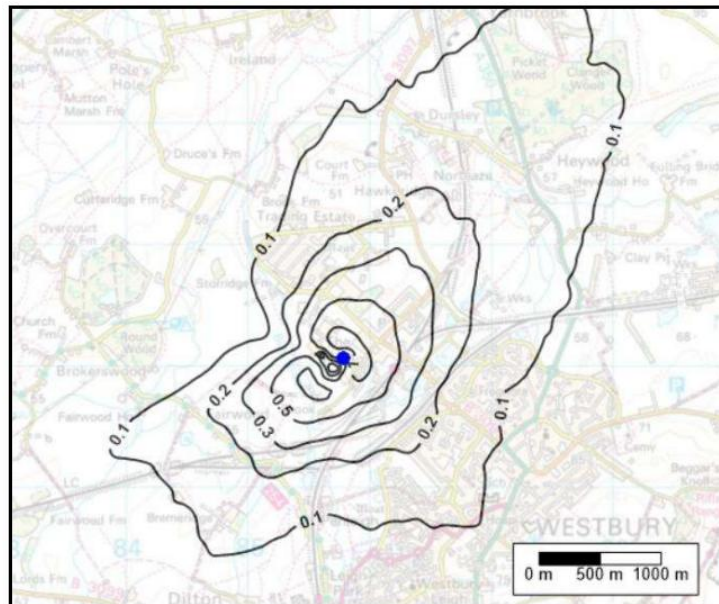
- 8.3 ADM Ltd completed an air quality assessment which includes an odour assessment for the Northacre Renewable Energy Westbury development³² as part of the planning application for the development
- 8.4 ADM Ltd completed odour modelling within the assessment. Terrain data was included in the model, and five years of hourly meteorological data for 2012–2016 were used in this assessment, with the worst-case year of results reported. A contour plot was plotted to odour units, referred to in the IAQM Odour Guidance¹. 'Odour unit' is the term for the unit of measurement for odour. The results of the ADM Ltd odour modelling, displayed as contours of odour units, are shown in **Figure 3**.

³⁰ https://environment.data.gov.uk/public-register/industrial-installations/registration/EPR-CP3803LV?__pageState=result-all

³¹ [Permit_-_CP3803LV.pdf](#)

³² ADM Ltd (2018) Air Quality Assessment of Emissions to Atmosphere from Northacre Renewable Energy, Westbury. Report reference P1713

Figure 3: ADM Ltd Modelled Contour Plot: Predicted 98th Percentile of Hourly Average Odour Concentrations ($\text{OU}_e \text{ m}^{-3}$); 2016 Meteorological Data



8.5 The ADM Ltd assessment states that:

“The odour emissions from the proposed facility would be best categorised as being moderately offensive. Therefore, for the purpose of this assessment a benchmark of $3 \text{ OU}_e \text{ m}^{-3}$ 98th percentile of hourly averages is appropriate for assessment of the potential for annoyance”.

8.6 This benchmark is with regard to highly sensitive receptors. Residential receptors are recognised as being highly sensitive to odour.

8.7 The odour contour, shown in **Figure 3**, illustrates that the proposed development site is not expected to be exposed to odour concentrations above the benchmark of $3 \text{ OU}_e \text{ m}^{-3}$ 98th percentile at any location. Therefore, Northacre Renewable Energy is not expected to have a significant impact on the proposed development with regards to odour.

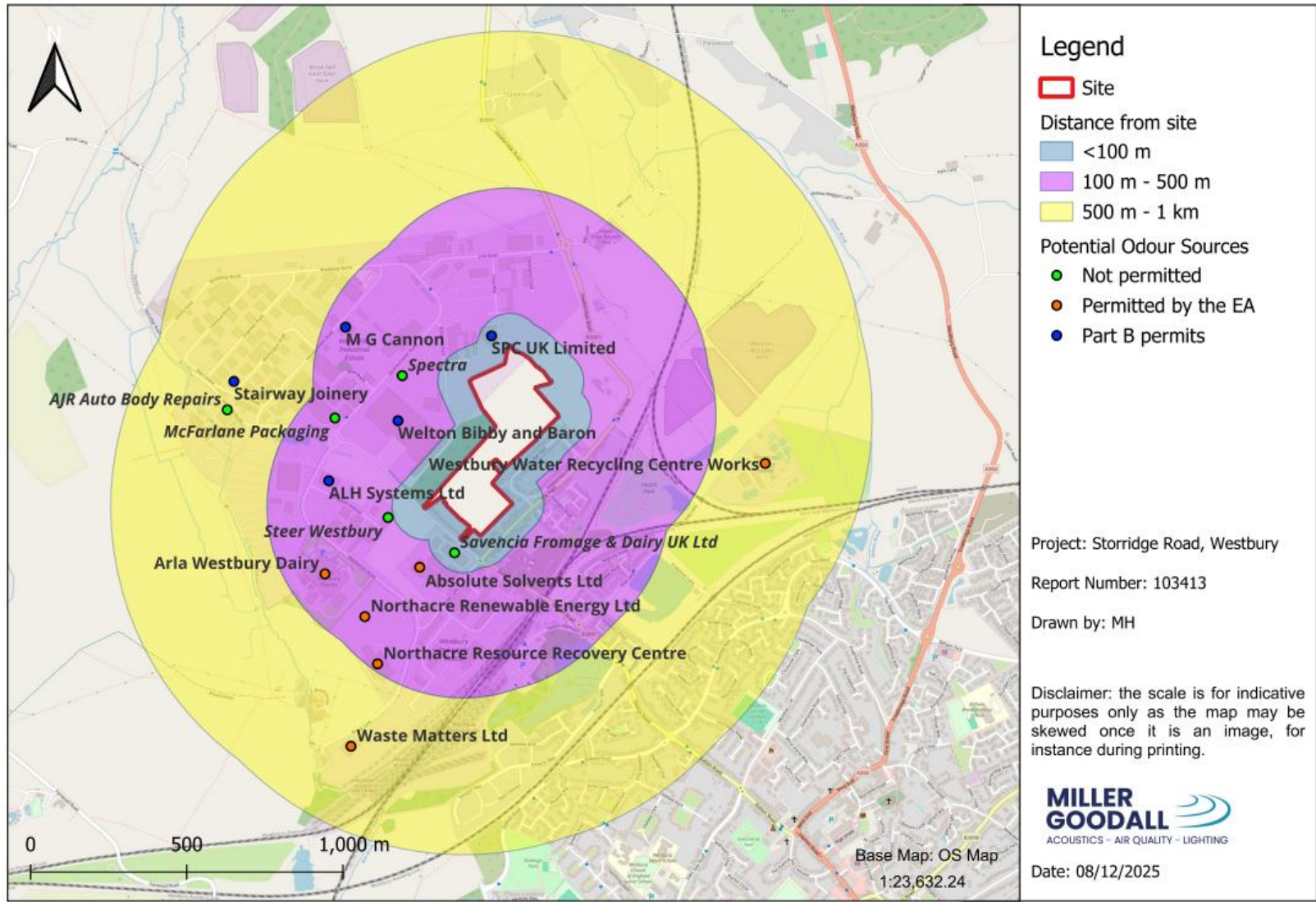
8.8 Furthermore, Condition 22 of the Appeal Decision for Northacre Energy from Waste Facility (Appeal Ref: APP/Y3940/W/22/3302008) outlines additional odour-related mitigation measures.

9 Summary of Impacts and Conclusion

- 9.1 An odour assessment has been undertaken to assess the potential odour impact of multiple sources on the proposed residential development at Storridge Road, Westbury.
- 9.2 Odour associated with operational businesses within 1 km of the site has been assessed in accordance with the methodologies set out in the Institute of Air Quality Management's 'Guidance on the assessment of odour for planning'. Northacre Renewable Energy Ltd has received planning approval. To evaluate the potential future odour risk from this installation, a review was undertaken of the planning application documents, including the submitted odour assessment, together with the appeal decision, which imposed conditions requiring the implementation of additional mitigation measures.
- 9.3 The assessment concluded that the level of odour associated with the potential odour sources in the local area would be insignificant to the proposed development.
- 9.4 There is, therefore, no reason for this application to be refused on the grounds of odour.

APPENDICES

Appendix A: Location of Site and Potential Odour Sources



Appendix B: IAQM Assessment of Odour Methodology

Source Odour Potential

The first step in the assessment is to estimate the odour generating potential of the site activities, termed the “Source Odour Potential”, which takes into account three factors:

- The scale (magnitude) of the release from the odour source, taking into account the effectiveness of any odour control or mitigation measures that are already in place. This involves judging the relative size of the release rate after mitigation and taking account of any pattern of release (e.g. intermittency).
- How inherently odorous the emission is. In some cases it may be known whether the release has a low, medium or high odour detection threshold (ODT); this is the concentration at which an odour becomes detectable to the human nose. In most instances the odours released by a source will be a complex mixture of compounds and the detectability will not be known. However, for some industrial processes the odour will be due to one or a small number of known compounds and the detection thresholds will be a good indication of whether the release is highly odorous or mildly odorous.
- The relative pleasantness/unpleasantness of the odour.

Using the factors above, **Table B1** can be used to determine whether the source odour potential is Large, Medium or Small.

Table B1: Determining the Source Odour Potential

Source Odour Potential	Magnitude	Compounds	Unpleasantness	Mitigation/Control
Large	Larger permitted processes of odorous nature or large Sewage Treatment Works (STWs); materials usage hundreds of thousands of tonnes/m ³ per year; area sources of thousands of m ² .	The compounds involved are very odorous (e.g. mercaptans), having very low Odour Detection Thresholds (ODTs) where known.	Processes classed as "Most offensive" ³³ (where known) compounds/odours having unpleasant (-2) to very unpleasant (-4) hedonic score.	Open air operation with no containment, reliance solely on good management techniques and best practice.
Medium	Smaller permitted processes or small (STWs); materials usage thousands of tonnes/m ³ per year; area sources of hundreds of m ² .	The compounds involved are moderately odorous.	Processes classed in H4 as "Moderately offensive"; or (where known) odours having neutral (0) to unpleasant (-2) hedonic score.	Some mitigation measures in place, but significant residual odour remains.
Small	Falls below Part B threshold; material usage hundreds of tonnes/m ³ per year; area sources of tens m ² .	The compounds involved are only mildly odorous, having relatively high ODTs where known.	Processes classed as "Less Offensive" in H4; or (where known) compounds/odours having neutral (0) to very pleasant (+4) hedonic score.	Effective, tangible mitigation measures in place (e.g. BAT, BPM) leading to little or no residual odour.

³³ Table 5 in the IAQM "Guidance on the Assessment of Odour for Planning"

Effectiveness of Pollutant Pathway

Next, the effectiveness of the pollutant pathway as the transport mechanism for odour through the air to the receptor, versus the dilution/dispersion in the atmosphere, is estimated. Any factor that increases dilution and dispersion of the odorous pollutant plume as it travels from source (e.g. processes and plant) to receptor will reduce the concentration at the receptor, and hence reduce exposure. Important factors to consider here are:

- The distance of sensitive receptors from the odour source.
- Whether these receptors are downwind (with respect to the predominant prevailing wind direction). Odour episodes often tend to occur during stable atmospheric conditions with low wind speed, which gives poor dispersion and dilution; receptors close to the source in all directions around it can be affected under these conditions. When conditions are not calm, it will be the downwind receptors that are affected. Therefore, receptors that are downwind with respect to the prevailing wind direction tend to be at higher risk of odour impact.
- The effectiveness of the point of release in promoting good dispersion, e.g. releasing the emissions from a high stack will – all other things being equal – increase the pathway, dilution and dispersion.
- The topography and terrain between the source and the receptor. The presence of topographical features such as hills and valleys, or urban terrain features such as buildings can affect air flow and therefore increase – or inhibit – dispersion and dilution.

Using the factors above, **Table B2** can be used to determine the effectiveness of the pollutant pathway.

Table B2: Determining the Effectiveness of Pollutant Pathway

Effective Pathway for Odour Flux to Receptor	Distance	Direction	Effectiveness of dispersion/dilution
High	Receptor is adjacent to the source/site; distance well below any official set-back distances.	High frequency (%) of winds from source receptor (or, qualitatively, receptors downwind of source with respect to prevailing wind).	Open process with low-level releases, e.g. lagoons, uncovered effluent treatment plant, landfilling of putrescible wastes.
Moderate	Receptor is local to the source.	–	Releases are elevated, but compromised by building effects.
Ineffective	Receptor is remote from the source; distance exceeds any official set-back distances.	Low frequency (%) of winds from source to receptor (or, qualitatively, receptors upwind of source with respect to prevailing wind).	Releases are from high level (e.g. stacks, or roof vents >3m above ridge height) and are not compromised by surrounding buildings.

Risk of odour impact

In the third step, the estimates of Source Odour Potential and the Pathway Effectiveness are considered together to predict the risk of odour exposure (impact) at the receptor location, as shown by the example matrix in **Table B3**.

Table B3: Risk of Odour Exposure (Impact) at the Specific Receptor Location

Pathway Effectiveness	Source Odour Potential		
	Small	Medium	Large
Highly Effective Pathway	Low Risk	Medium Risk	High Risk
Moderately Effective Pathway	Negligible Risk	Low Risk	Medium Risk
Ineffective Pathway	Negligible Risk	Negligible Risk	Low Risk

Receptor Sensitivity

For the sensitivity of people to odour, the IAQM recommends that the air quality practitioner uses professional judgment to identify where on the spectrum between high and low sensitivity a receptor lies, taking into account the following general principles shown in **Table B4**.

Table B4: Sensitivity of the Receptor

Receptor	Descriptor
High Sensitivity Receptor	Surrounding land where: Users can reasonably expect enjoyment of a high level of amenity. The people would reasonably be expected to be present here continuously, or at least regularly for extended period, as part of the normal pattern of use of the land. Examples may include residential dwellings, hospitals, schools/education and tourist/cultural
Medium Sensitivity Receptor	Surrounding land where: Users would expect to enjoy a reasonable level of amenity, but wouldn't reasonably expect to enjoy the same level of amenity as in their home. People wouldn't reasonably be expected to be present here continuously or regularly for extended periods as part of the normal pattern of use of the land. Examples may include places of work, commercial/retail premises and playing/recreational fields.
Low Sensitivity Receptor	Surrounding land where: The enjoyment of amenity would not be reasonably expected. There is transient exposure, where the people would reasonably be expected to be present only for limited periods of time as part of the normal pattern of use of the land. Examples may include industrial, farms, footpaths and roads.

Magnitude of odour impact

The next step is to estimate the effect of that odour impact on the exposed receptor, taking into account its sensitivity, as shown in **Table B5**. The odour effects may range from negligible, through slight adverse and moderate adverse, up to substantial adverse. The IAQM uses a colour gradient system for each impact category, as a means of describing that odour can be subjective.

Table B5: Likely Magnitude of Odour Effect at the Specific Receptor Location

Risk of Odour Exposure (From Table 5)	Receptor Sensitivity				
	Low	Medium	High		
High Risk of Odour Exposure	Slight Adverse Effect	Moderate Adverse Effect	Substantial Adverse Effect		
Medium Risk of Odour Exposure	Negligible Effect	Slight Adverse Effect	Moderate Adverse Effect		
Low Risk of Odour Exposure	Negligible Effect	Negligible Effect	Slight Adverse Effect		
Negligible Risk of Odour Exposure	Negligible Effect	Negligible Effect	Negligible Effect		

This procedure results in a prediction of the likely odour effect at each sensitive receptor.

Appendix C: Photographs of Identified Odour Sources

SPC Europe Ltd (Google Streetview)



Welton Bibby Baron (Google Streetview)



Spectra (Google Streetview)



Macfarlane Packaging (photograph taken during the site visit⁶)



Arla Westbury Dairy (photograph taken during the site visit⁶)



M G Cannon (Google Streetview)



Glossary of Terms

Annoyance (Odour) Loss of amenity due to odour, often related to people making complaints, but not necessarily sufficient to be a legal nuisance.

Defra Department for Environment, Food and Rural Affairs

Effects The consequences of the changes in airborne concentration and/or odour for a receptor. These might manifest as annoyance. The term 'significant effect' has a specific meaning in EIA regulations. The opposite is an insignificant effect. In the context of construction impacts any effect will usually be adverse, however, professional judgement is required to determine whether this adverse effect is significant based in the evidence presented.

IAQM Institute of Air Quality Management

Impacts The changes in airborne concentrations and/or odour. A scheme can have an 'impact' on odour without having any 'effects', for instance if there are no receptors to experience the impact.

NPPF National Planning Policy Framework

Nuisance The term nuisance odour is often used in a general sense when describing amenity odour. However, this term also has specific meanings in environmental law:

Statutory nuisance, as defined in S79(1) of the Environmental Protection Act 1990 (as amended from time to time).

Private nuisance, arising from substantial interference with a person's enjoyment and use of his land.

Public nuisance, arising from an act or omission that obstructs, damages or inconveniences the right of the community.

Each of these applying in so far as the nuisance relates to the unacceptable effects of emissions. It is recognised that a significant loss of amenity may occur at lower levels of emission than would constitute a statutory nuisance.

Note: as nuisance has a specific meaning in environmental law, and to avoid confusion, it is recommended that the term is not used in a more general sense.

