

Environmental Control and Protection - Planning Consultation Response

To:	Gen Collins Planning Officer
From:	Vicky Brown Senior Environmental Health Officer
Date:	17.07.2026
Planning Application Reference:	PL/2026/03375
Environmental Health Reference:	C-1592707
Description of Proposal:	Outline application for the demolition of number 5 and 6 Storridge Road and the erection of up to 165 dwellings (including affordable housing), with public open space, structural planting, landscaping, and sustainable drainage system (SuDS) and vehicular access point. All matters reserved except for means of access.
Address:	Land off Storridge Road, Westbury, BA13 4HX
Recommendation:	

Comments:

Odour Assessment Review

This memo relates specifically to Document 18 – Odour Assessment prepared by Miller Goodall on behalf of the applicant. A separate memo will be provided covering noise, contaminated land, air quality and other Environmental Protection matters. Given current service pressures and workload demands, I did not wish to delay these comments while the remainder of the application is reviewed.

I have reviewed the submitted Odour Assessment against the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Odour for Planning. The assessment is broadly consistent with the IAQM source–pathway–receptor methodology and considers source odour potential,

pathway effectiveness, receptor sensitivity and likely odour effects arising from a number of existing and permitted odour sources within approximately 1 km of the proposed development site. The proposed residential use has appropriately been identified as a high-sensitivity receptor.

However, I do not consider that the assessment is sufficiently robust, in its current form, to demonstrate that odour effects would be negligible or insignificant with an acceptable degree of confidence.

In particular, the report should be amended to correct the reference to the IAQM guidance, which is cited as a 2024 document. The applicable guidance is IAQM Guidance on the Assessment of Odour for Planning, Version 1.1 (July 2018).

The assessment should also provide a clearer and more transparent justification for the source odour potential and pathway effectiveness ratings assigned to nearby odour sources. This is particularly important for sources located to the south-west and west of the site, given the report's acknowledgement that prevailing winds are generally from the west-south-west towards the east-north-east, creating a potentially more effective pathway between those sources and the proposed receptors.

Further clarification is required in relation to the Northacre Resource Recovery Centre. The report identifies a history of odour complaints associated with the facility, together with Environment Agency compliance reports that have recorded minor odour-related non-compliances beyond the site boundary. The assessment should explain how this complaint and compliance history has been considered when determining the source odour potential rating and reaching the overall conclusion on odour significance.

Whilst IAQM guidance does not require field odour surveys or sniff testing in every case, the assessment appears to rely primarily on desk-based information and qualitative source–pathway–receptor judgements. Given the proximity of several potentially odorous industrial and waste management activities, together with the documented complaint history relating to certain facilities, the applicant should clarify whether any structured field odour observations, walkover surveys or sniff testing exercises were undertaken. If no such work was carried out, a clear justification should be provided explaining why it was not considered necessary to support the assessment conclusions.

The applicant should also:

1. Include a brief section setting out the key uncertainties and limitations of the assessment;
2. Justify the selection and representativeness of the Larkhill WindFinder meteorological data used within the assessment;
3. Confirm whether any structured field odour observations or sniff testing were undertaken and, if not, explain why these were not considered necessary;
4. Confirm that the assessment of the approved Northacre Renewable Energy Ltd Energy-from-Waste facility reflects the latest approved and permitted design, operational parameters and odour control measures.

Subject to satisfactory clarification of the above matters, it may ultimately be possible to accept the report's conclusion that odour effects at the proposed development would be negligible to slight adverse. At present, however, I recommend that further information is requested before Environmental Protection is able to confirm that it has no objection on odour grounds.

