

To: Public Protection, Wiltshire Council **From:** SLR Consulting Limited

cc: Turley **Date:** 24 September 2026

Project No. 410.068225.00001

RE: Penn Hill Farm, Calne: Public Protection Odour Response

1.0 Introduction

SLR Consulting previously submitted an air quality and odour assessment¹ (the ‘assessment’) in support of an outline planning application for the development of 210 residential dwellings and 0.75ha of employment land and ancillary uses (the ‘Proposed Development’) at Penn Hill Farm, Calne, Wiltshire (the ‘Site’). The planning application for the Proposed Development was submitted to Wiltshire Council (WC) on 21st November 2025 (application reference: PL/2025/09192).

Following submission and during formal consultation, WC Public Protection Services have submitted an objection² regarding the odour content of the assessment on the basis of “*odour from nearby waste management operations, particularly the Lower Compton Landfill*” (the ‘landfill’). The comments are presented in full in Appendix A: WC Public Protection Comments.

This response addresses these comments and sets out why the assessment’s treatment of odour emissions is appropriate for planning.

1.1 Assessment Background

An odour assessment was originally undertaken at the request of the WC³ Environmental Health Officer (EHO) in relation to consultation comments to a previous, and subsequently withdrawn, planning application at the Site (application reference: PL/2023/07216). In that instance, the EHO required an odour assessment with reference to the ‘Hills Waste processing site in close proximity to the Site’, i.e. the Hills Waste Solutions (Hills Waste) Sands Farm Material Recovery Facility (MRF).

A qualitative Source–Pathway–Receptor (S-P-R) approach following the Institute of Air Quality Management (IAQM) *Guidance on the assessment of odour for planning*⁴ (the ‘IAQM odour guidance’) was subsequently agreed with the EHO in October 2025⁵. However, at this point the EHO raised the mounting number of landfill related odour complaints being generated within the wider Calne area. The odour assessment therefore included consideration of odours associated with the landfill, in addition to the MRF and the Hills Waste, Lower Compton Waste Recovery facility (WRF).

Following initial submission⁶, the assessment was updated⁷ to account for the odour complaints record received from the Environment Agency (EA) who regulate the landfill. The assessment was subsequently updated again (v4.0) in response to a request from WC

¹ 410.067010.00001_Penn Hill Farm Calne Air Quality and Odour Assessment v4.0, 21 January 2026. The latest submitted to the case officer.

² Wiltshire Council, Public Protection Objection, 7 September 2026.

³ PL/2023/07216, Brett Warren (EHO at WC) Planning Consultation Response, 22nd November 2023.

⁴ IAQM, Guidance on the assessment of odour for planning, v1.1 July 2018.

⁵ Email correspondence from Brett Warren (EHO at WC) to SLR Consulting Ltd, dated 20th October 2025.

⁶ 410.067010.00001_Penn Hill Farm Calne Air Quality and Odour Assessment v2.0, 11 November 2025.

⁷ 410.067010.00001_Penn Hill Farm Calne Air Quality and Odour Assessment v3.0, 21 November 2025.

Public Protection⁸ to additionally assess odours from the wood waste incineration process at Grist Environmental Management Services.

WC Public Protection subsequently accepted⁹ the assessment in February 2026, stating “*no objection - subject to conditions*”. It is noted these stated draft conditions did not identify any requirement for further odour assessment or mitigation.

Notwithstanding the above, in September 2026 WC Public Protection submitted an objection relating on odour grounds regarding the “*nearby waste management operations*” albeit this relates to the landfill operations. In consideration of this and the previously accepted wider odour assessment, the matters considered within this response are limited to potential odours associated with the landfill, only.

It is also worth noting that in 2023, WC Public protection raised no objection on odour grounds to an adjacent residential application located closer to the landfill than the Site (application reference: PL/2023/02331, since withdrawn) with odour impacts from the landfill screened out on the basis of distance within that assessment.

1.2 Lower Compton Landfill Background

The landfill is regulated by the EA under Environmental Permit (EP) reference EPR/BU5801ID. The EP includes several conditions, including the following in relation to odour:

“3.3 Odour

3.3.1 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.”

Prior to 2025, odour complaints to WC and the EA were limited and were not typically substantiated indicating no evidence of persistent, long-term odour impacts from the landfill. However, from early 2025 there has been a substantial increase in odour complaints, with the EA and WC substantiating a number of complaints as originating from the landfill.

The marked increase in complaints compared with the historical pattern indicates a change in site conditions or odour management since 2025, rather than evidence of an established, long-term odour issue. The operator has also acknowledged that activities at the site contributed to local odour complaints¹⁰.

The available information indicates that the recent odour issues are associated, at least in part, with the landfill gas management system and landfill capping which are the key controls for odour emissions from landfills. Subject to the successful implementation of the necessary remedial measures and effective ongoing management of the site, it is anticipated that odour impacts will reduce and may return towards the levels experienced prior to 2025. That is the landfill will comply with the conditions of its EP.

Hills Waste, as the landfill operator, and the EA, in its role as regulator, have been, and continue to be, actively addressing these issues with the aim of resolving them. The EA have tracked their involvement¹¹ since they began to receive complaints in early 2025 and

⁸ PL/2025/09192, Public Protection's Comment, WC-25-12-358676, 18th December 2025.

⁹ Wiltshire Council, Public Protection's Comment, 10th February 2026.

¹⁰ BBC article: <https://www.bbc.co.uk/news/articles/cgj89wee895o>.

¹¹ <https://engageenvironmentagency.uk/engagementthq.com/wessex-regulated-industry-sites/widgets/123561/faqs#39921>.



undertook initial monitoring. Actions undertaken to address odours are briefly summarised as follows:

- April 2025: Served an enforcement notice requiring the operator to complete engineering works in a recently filled area of the landfill to reduce emissions. Permanent capping work to this area was completed in May 2025. The operator undertook a surface emissions survey of the complete landfill infrastructure in April 2025. Additional remedial works identified during the EA's survey of the landfill as well as the surface emissions survey were completed in May 2025;
- June 2025: The operator was served with a Regulation 36 enforcement notice under the Environmental Permitting Regulations 2016, which required them to complete permanent capping work to the northern end of the landfill and install permanent gas infrastructure over the same area by the end of July 2025. This was duly completed;
- July 2025: Inspection of the landfill concluded that odour emissions from the newly capped northern areas had "*significantly reduced*". The operator was asked to review their management systems;
- August 2025: An EA inspection found highly odorous gas emissions from the area of landfill where waste was actively being tipped, identifying that a higher proportion of the waste deposited comprised 'trommel fines'. The operator was required to undertake additional measures to contain and collect landfill gas produced as the cell is filled. These included additional gas collection pipework, minimising the working area, and additional clay/soil cover on other areas of the cell. Odour complaints reduced to the end of 2025;
- January 2026: Reports of odour increased again and were linked to the installation of the next phase of gas collection pipework infrastructure by the operator. Gas well installation work was completed in February 2026;
- April 2026: Odours were traced to cell 26D of the landfill and the operator was requested provide a short to long-term action plan¹² identifying how they will minimise odour and emissions from this area, and the likelihood of reoccurrence in future cells;
- June 2026: Ongoing capping works. Odour levels were assessed as "*faint*" to "*transient*"; and
- July 2026: Permanent and temporary capping works completed. Six additional landfill gas wells being installed in the newly capped area.

In their most recent update on 21st August 2026¹³, the EA confirmed the recent permanent capping of half of cell 26D has reduced odorous emissions from this area and observed offsite odours are of a "*low levels of intensity*", which would not typically be associated with significant odour effects.

The extent of the EA's involvement and implementation of the above remedial measures provides confidence that the odour issues will be addressed and resolved. A WC councillor has confirmed "*this problem will be resolved*"¹⁴. The current odour issues therefore shouldn't be treated as representative of normal or long-term operations.

¹² Odour mitigation plan – Lower Compton landfill, April 2026. Available at: <https://www.hills-waste.co.uk/news/lower-compton-landfill-action-plan>.

¹³ https://engageenvironmentagency.uk/engagementthq.com/wessex-regulated-industry-sites/news_feed/calne-monitoring-update-21-august-2026.

¹⁴ BBC article, Wiltshire Council councillor Sam Pearce-Kearney comments, 27 April 2026. <https://www.bbc.co.uk/news/articles/c0kryj3empgo#:~:text=%22But%20actually%20this%20problem%20will%20be%20resolved.>



2.0 What Has Changed Since the Odour Assessment Was Accepted?

The WC Public Protection comments introduce additional evidence of odour issues across Calne associated with the operation of the landfill that was not available at time of the assessment. This includes:

- An EA monitoring study (October 2025 – April 2026)¹⁵;
- A linked UK Health Security Agency (UKHSA) public health risk assessment¹⁶; and
- WC's own complaints investigation.

This additional evidence provides further confirmation of ongoing odour issues associated with the landfill and has informed WC Public Protection's decision to revise its previous position and raise an objection on grounds of odour.

However, the additional evidence does not materially change the matters considered in the original assessment, which reached a position of 'no objection' previously from WC Public Protection. The assessment already acknowledged the current odour issues associated with the operation of the landfill, based on the available odour complaint data showing a large and ongoing number of complaints.

Whilst the additional evidence confirms these ongoing odour issues, it does not identify a materially different situation from that already considered. Rather, it provides further evidence in relation to an issue that was already recognised.

On this basis, it is not considered that the additional evidence, in itself, justifies a change from the previous position of no objection.

3.0 Approach Adopted in the Assessment

3.1 Consideration of the Landfill

The landfill is regulated by the EA, with its EP requiring the site to be operated so as to prevent or minimise unacceptable pollution, including odour impacts beyond the landfill boundary.

The complaints record prior to 2025 does not indicate persistent or long-term odour impacts from the landfill suggesting that it has historically been operating within its EP limits, with odours controlled. This is consistent with the previous approach taken by WC Public Protection, which accepted that odour effects could be screened out on the basis of distance in respect of an adjacent residential application which was located closer to the landfill than the Site (application reference: PL/2023/02331, since withdrawn).

There are current odour issues associated with the operation of the landfill which are acknowledged within the assessment. These issues are recognised by both the landfill operator and the EA and are being actively addressed through remedial measures (Section 1.2). On this basis, these issues are anticipated to be resolved over the longer term, with the landfill returning to compliance with its EP requirements. Long term conditions at the Site are therefore better represented by the historical baseline (prior to 2025) in which associated odours were not identified to result in significant effects.

¹⁵ EA, Study of Ambient Air Quality at Lower Compton, 15 October 2025 to 16 April 2026. Version: (AAM/TR/2026/05). June 2026.

¹⁶ UKHSA, public health risk assessment, CIMS200555654 CIRIS92485 V01.00. 06 July 2026.



The assessment referenced paragraph 201 of the National Planning Policy Framework¹⁷ (NPPF) as the version relevant at the time of assessment and reporting. The distinction between planning and pollution control elements of the NPPF are now reflected in Policy DM7 the new August 2026 publication of the NPPF¹⁸, as follows:

“DM7: Relationship with other regulatory regimes

- 1. Development proposals should be assessed on the basis of whether they would be an acceptable use of land. Matters which are controlled by separate regulatory regimes may, in the context of a particular development proposal, be a material consideration where they have land-use implications. Decision-makers should assume, unless there is clear evidence to the contrary, that those separate regimes will operate effectively.*
- 2. Planning decisions should not seek to duplicate or extend controls imposed by separate regulatory regimes other than where there is a development plan policy in place applying optional technical standards for the development proposed [...]*

As such, for planning purposes it should be considered that the landfill operates in accordance with its EP and that the pollution control measures function effectively. There is currently no indication from the EA that the landfill is not capable of achieving the required EP conditions following the remedial actions. Following the current measures they remark “we will work in partnership with Wiltshire Council Environmental Health Officers to monitor odour levels in the community and assess the effectiveness of the capping. We will take further regulatory action if necessary to ensure the site is operating in compliance and impacts on the community are appropriately controlled”¹⁹.

3.2 Proposed Development Design

The Site layout design is already optimised as much as possible from an odour perspective relative to the landfill, as more sensitive uses (i.e. residential) are positioned to the west of the Site. Further onsite mitigation against odours are not feasible.

4.0 Response to Public Protection Comments

4.1 Application of NPPF

The WC Public Protection comments cite NPPF paragraph 200 (now superseded by DM7 part 1 of the August 2026 NPPF) but do not appropriately consider NPPF paragraph 201 (now superseded by DM7 part 2 of the August 2026 NPPF). The two paragraphs should be considered together. In particular, the assessment of residential amenity should be undertaken on the basis that the environmental permitting regime operates effectively and that pollution-control matters are appropriately regulated through that regime.

As discussed further in Section 4.2, the WC Public Protection comments do not recognise the EA’s regulatory role in resolving the issues, nor the remedial measures that have been completed or are in the process of being completed. Improvements have already been demonstrated and there is no ‘clear evidence’ to suggest that the EA and the landfill operator cannot ensure the effective operation of the landfill.

¹⁷ Ministry of Housing, Communities & Local Government, National Planning Policy Framework, December 2024.

¹⁸ Ministry of Housing, Communities & Local Government, National Planning Policy Framework, August 2026.

¹⁹ EA, Odour Response in Calne 26 June 2026,

https://engageenvironmentagency.uk/engagementhq.com/wessex-regulated-industry-sites/news_feed/odour-response-in-calne-26-june-2026.



4.2 Remedial Works

The WC Public Protection comments make no reference to, or assessment of, the EA's role in addressing the odour issues in its role as the regulator or the improvement and remedial measures which have continued to be implemented, as outlined in Section 1.2.

Extensive measures are being undertaken, principally comprising capping and gas extraction, together with ongoing monitoring to assess their effectiveness. It is not reasonable therefore to assume that the current level of odour generation and associated complaints will persist indefinitely. The EA assert that implementation of these remedial measures is *"the best long-term solution to minimise odour and emissions"*.

The comments suggest that the assessment over relies on an assumption that the current odour issues are temporary and that conditions will revert to historic levels once the remedial works have been completed. However, the complaints record indicates the current period of landfill odour generation and associated offsite impact **is** temporary. There is evidence that the remedial works are already resulting in improvements, with complaints reducing on a monthly basis since March²⁰. Complaints following completion of the latest remedial works, involving capping and gas extraction are not publicly available at the time of writing. Notwithstanding, the EA has already reported that these works have reduced odorous emissions from Cell 26D of the landfill, where the odour was traced to. The EA has also observed that off-site odours are of a 'low level of intensity', which would not typically be associated with significant odour effects.

There remains an ongoing requirement for both the operator and the EA to address the odour issues and ensure that emissions are brought into compliance with the EP, as acknowledged by the EA and a WC councillor. It is therefore reasonable, from a planning perspective, to proceed on the basis that the operation of the landfill will be brought under appropriate control through the environmental permitting regime. In reference to NPPF policy DM7 part 1, there is **no** evidence to indicate the odour situation will not be resolved.

4.3 Permit Compliance

The Public Protection comments argue that compliance with the EP does not necessarily preclude adverse effects on residential amenity or the occurrence of a statutory nuisance. However, the landfill EP requires *"emissions from the activities shall be free from odour at levels likely to cause pollution outside the site"*.

When considered alongside the distance between the landfill and the Site, which is more than 1km, it is reasonable to conclude that compliance with the EP would substantially limit the potential for landfill odours to give rise to adverse effects on residential amenity at the Site. This is supported by the historical odour baseline, prior to 2025, as discussed in Section 3.1, during which there were few or no complaints associated with odour from the landfill.

4.4 Distance from the Landfill to Site

The WC Public Protection comments describe the potential odour sources, including the landfill, as being in "close proximity" to the Site. However, as referenced above, the landfill is located more than 1km from the Site and should therefore be regarded as being 'distant' (i.e. proposed receptors are remote from the landfill), rather than close.

²⁰ <https://engageenvironmentagency.uk/engagementhq.com/wessex-regulated-industry-sites/widgets/123561/faqs#question39922>.



The separation distance is relevant when considering the potential for odour emissions from the landfill to result in an adverse effect at the proposed receptors, particularly when considered alongside the EP requirements and the historical odour baseline.

4.5 Frequency of Exposure

The UKHSA public health risk assessment evidences that during the length of the monitoring campaign, concentrations of hydrogen sulphide at the monitoring station in Calne centre were at levels sufficient to be odorous for only 1.3% of the total monitoring period. This represents a relatively limited frequency of potential odour exposure.

The public health risk assessment identifies increased odour exposure during March and April 2026, coinciding with the period of peak odour complaints. As discussed in Section 1.2, the EA identified the open landfill cell as the principal source of odour during this time and an action plan was subsequently implemented to address this issue. Given that the principal source was identified and remedial measures subsequently implemented, the elevated exposure associated with this episode is considered likely to be temporary rather than representative of longer-term conditions.

4.6 Public Protection Site Visits

WC Public Protection refers to approximately 80 hours of site visits/investigations to enable the significance of the observations to be properly assessed. However, no supporting detail is provided. In particular, the comments do not identify where the observations were undertaken in relation to the Site, the periods over which the observations were made, or the results of the assessments, including the intensity, frequency and duration of any odours recorded.

A standardised assessment method has been published for such odour assessments; the protocol allows for odour to be detected at low intensities, frequencies and durations while still concluding a 'not significant' effect. There is nothing to suggest WC Public Protection's own observations indicated significant effects.

5.0 Summary

WC Public Protection has raised an objection regarding the odour content of the assessment, reversing its previous position of no objection in response to additional evidence relating to odour associated with the landfill. These issues were already acknowledged within the assessment and, therefore, it is not considered that the additional evidence, in itself, justifies the change from the previous position.

The assessment has been appropriately undertaken in accordance with the NPPF, on the basis that pollution control is appropriately regulated through the environmental permitting regime. The EA, as the relevant regulatory authority, is overseeing the odour issues, with the landfill operator implementing the required remedial measures. Improvements have already been demonstrated and there is no evidence to indicate that these odour issues will not be resolved. The comments from WC Public Protection do not fully reflect the EA's regulatory role or the remedial measures being undertaken.

On this basis and having regard to the distance between the landfill and the Site as well as the limited frequency of potential exposure, it is reasonable to conclude that the potential for landfill odours to give rise to adverse effects on residential amenity at the Site would be substantially limited. This is supported by the historical odour baseline prior to 2025, during which there were few or no complaints associated with odour from the landfill.



Appendix A: WC Public Protection Comments

Public Protection objects to this application on the grounds that there is a significant adverse impact on amenity due to odour from nearby waste management operations, particularly the Lower Compton Landfill.

The application seeks outline permission for up to 210 residential dwellings, together with employment land and associated infrastructure. The proposed residential element constitutes highly sensitive receptors and must be demonstrated to be capable of achieving an acceptable level of residential amenity throughout the lifetime of the development.

The applicant's odour assessment acknowledges that the site lies in close proximity to a number of waste management facilities including the Lower Compton Landfill, which is identified as a "large" odour source and located approximately 1,080m from the proposed residential development. The assessment also confirms that significant numbers of odour complaints have been received in 2025 and that some complaints have been substantiated by the Environment Agency as originating from the landfill.

Of particular concern is the acknowledgement within the applicant's assessment that over 1,000 odour complaint events were recorded by the Environment Agency during 2025, many attributed to the landfill, together with multiple complaints received by Wiltshire Council. The report further states that the operator has implemented remedial measures, but complaints have continued to be received.

Public Protection does not agree that the current situation can simply be disregarded on the basis that permitting controls are expected to operate effectively. Whilst paragraph 201 of the NPPF requires planning authorities to avoid duplicating pollution control regimes, it does not remove the requirement under paragraph 200 and Core Policy 57 to ensure that new residential development can achieve an acceptable standard of amenity and is compatible with surrounding land uses.

The applicant's assessment relies heavily upon the assumption that the current odour issues are temporary and that future conditions will revert to historic levels once remediation works are completed. However, Public Protection is currently investigating complaints relating to odour in the area and there are ongoing concerns regarding potential statutory nuisance. The EA are investigating alleged breaches of environmental permit conditions associated with landfill operations. These matters demonstrate that odour impacts are not merely theoretical but are being experienced by residents across the wider area. It is important to note that compliance with an Environmental Permit does not necessarily preclude a significant adverse effect on residential amenity, nor does it rule out the potential for a statutory nuisance. The thresholds and assessment criteria for these matters are different. In particular, the threshold for a significant adverse impact on residential amenity is generally lower than that applied when determining compliance with an Environmental Permit or the existence of a statutory nuisance. Consequently, an activity may comply with its permit requirements whilst still giving rise to unacceptable amenity impacts for nearby residents.

Public Protection has undertaken approximately 80 out-of-hours site visits and investigations in response to complaints. During these visits officers have repeatedly detected and verified landfill-type odours affecting the local area. This represents direct observational evidence of odour impact which raises significant concerns regarding the suitability of introducing a substantial number of additional sensitive receptors into the vicinity.

The applicant's assessment correctly identifies the proposed residential use as being a receptor of high sensitivity to odour. The proposed development would therefore place a significant number of new residents within an area that is currently experiencing ongoing odour problems and where regulatory investigations remain active.



Furthermore, the site context is clearly illustrated within the applicant's assessment, showing the proposed development and its relationship to the landfill and associated waste management facilities.

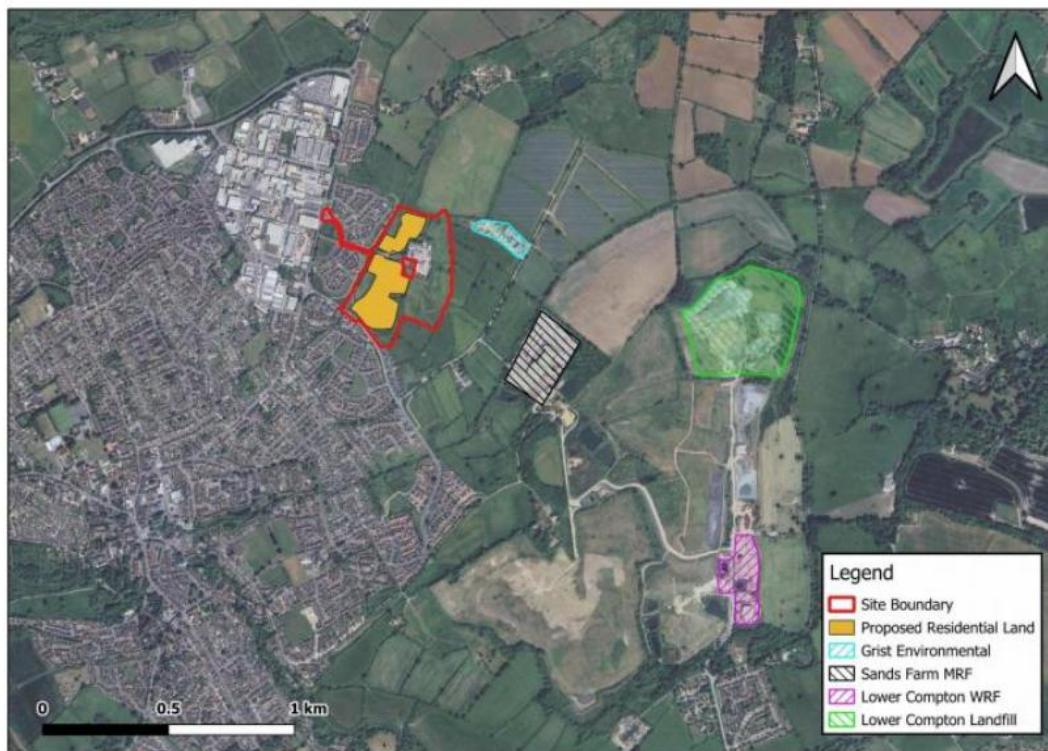


Figure 4-2: Site Setting and Potential Local Odour Sources

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On top of this the UKHSA have released a public health risk assessment of the Environment Agency (EA) Study of Ambient Air Quality at Lower Compton from 15 October 2025 to 16 April 2026, published in June 2026 version AAM/TR/2026/05.

The UKHSA report was commissioned following increased community concerns regarding odour from the landfill and explicitly acknowledges that the monitoring location may not represent the highest levels experienced in the area, noting that concentrations experienced closer to the source may be higher

The findings of the UK Health Security Agency (UKHSA) Public Health Risk Assessment published on 6 July 2026 demonstrate that odour impacts arising from the landfill remain a current and evidenced concern for the local community.

As well as this the report found:

- Hydrogen sulphide concentrations exceeded the World Health Organisation odour annoyance guideline on 106 separate occasions during the monitoring period.
- Concentrations exceeded the WHO odour annoyance threshold for 1.3% of the total monitoring period, increasing to 4.9% during March 2026 and 3.1% during April 2026.
- Monitoring demonstrated intermittent exceedances throughout December 2025, January 2026, February 2026, March 2026 and April 2026.
- Directional analysis concluded that the highest concentrations of hydrogen sulphide originated from the direction of Lower Compton Landfill



Importantly, whilst UKHSA concluded that toxicological health standards had not been exceeded, it specifically warned that where hydrogen sulphide concentrations exceed the WHO odour annoyance guideline there is potential for significant community impact. The report states:

"Odours can become a nuisance and start to affect people, causing temporary symptoms including headache, nausea, dizziness, watery eyes, stuffy nose, irritated throat, cough, particularly if a person has a pre-existing respiratory condition, sleep problems and stress."

The report further states:

- The more exposure time spent above the guideline, the greater the likelihood of symptoms being experienced and impacting on people's health and wellbeing
- UKHSA additionally recognises that individuals with asthma, COPD and other respiratory conditions may experience increased frequency and severity of symptoms as a result of odour exposure.

The data indicates that the mobile monitoring facility location was affected by both intermittent and relatively continuous sources of H₂S from Lower Compton landfill site.

Taken together, the UKHSA findings, the ongoing regulatory investigations, the significant complaint history, and Public Protection's own observations demonstrate that odour impacts are not historical or merely theoretical. They are current, measurable, attributable to the landfill, and are already affecting the health, wellbeing and amenity of existing residents.

In the opinion of Public Protection, the submitted odour assessment does not adequately reflect the current odour climate experienced by residents in Calne and places undue reliance upon assumptions regarding future operational performance of the landfill. The assessment therefore fails to provide sufficient confidence that future occupiers would not be exposed to recurring odour events and consequent loss of amenity.

Accordingly, Public Protection considers that the application conflicts with:

- Wiltshire Core Policy 57, which requires development to secure appropriate levels of amenity for future occupants.
- Wiltshire Core Policy 55, which seeks to protect public health, environmental quality and amenity.
- Paragraph 200 of the NPPF, which requires planning decisions to ensure that new development is integrated effectively with existing uses and does not result in unacceptable impacts upon future occupants.

For these reasons Public Protection objects to the application and considers the site unsuitable for residential development until it can be robustly demonstrated, using evidence representative of current conditions, that future occupiers will not be subject to unacceptable odour impacts arising from nearby waste management operations, including the Lower Compton Landfill for the lifetime of the development.

It is acknowledged that comments on the odour assessment were provided by Peter Nobes in February 2026, and our current position differs from those earlier comments. However, the circumstances and evidence base have developed significantly over the intervening six months. Since that time, further information has become available, including findings from odour monitoring visits undertaken by Environmental Protection and the UKHSA Public Health Assessment. These are material considerations that must be taken into account as part of the current planning consultation.

It would be inappropriate to disregard this additional evidence when responding to the application. The National Planning Policy Framework makes clear that the planning system should contribute to the achievement of sustainable development, including the creation of healthy and safe places, and should ensure that development is appropriate for its location



having regard to the effects of pollution on health, living conditions and the natural environment. The planning process is intended to balance the economic, social and environmental objectives of sustainable development and to ensure that decisions are based on all relevant and up-to-date evidence available at the time they are made.

In this case, the additional monitoring evidence and the conclusions of the UKHSA assessment provide important information regarding the potential effects of odour on the amenity and wellbeing of existing and future occupants. It is therefore necessary and appropriate that this evidence informs our consultation response and is given due weight in the determination of the application.

