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DC5184-AL1 - Air Quality Consultant's Expert Opinion - Proposed Residential Development at Former Spring Lane Nurseries, Spring Lane, Croft (Ref: 2024/00668/FUL)

1. INTRODUCTION

My name is Siobhan Goodman, Principal Air Quality Consultant at Dragonfly Consulting with direct responsibilities and involvement for all air quality, odour and dust related projects within the firm.

I am instructed by Green Belt Experts, on behalf of a number of interested parties to undertake an independent review of the environmental material considerations concerning application 2024/00668/FUL.

The proposals comprise the development of the site for permanent residential use through the siting of up to ten caravans on the land, and therefore, I have been instructed to provide expert advice on the potential for air quality, odour and dust impacts to affect future amenity at the site.

I hold a Bachelor of Science Degree, with Honours, in Environmental Geography and a Master of Science Degree in Environmental Science and Management, both obtained from the University of York. I am a Full Member of the Institute of Air Quality Management (IAQM) and a Full Member of the Institution of Environmental Sciences (IES). I have over seven years of full project life-cycle experience of environmental consultancy in the private sector, including in the fields of air quality, odour, dust and project management services. I have extensive experience in air quality modelling, monitoring, assessment and planning support, with the main areas of expertise including undertaking detailed dispersion modelling assessments of road vehicle and industrial emissions and preparing factual and interpretive Air Quality, Odour and Dust Assessment reports and Environmental Statement chapters. Furthermore, I have experience in preparing written representations and Statements of Case to support planning appeals, making sure that submissions are well-evidenced, clearly reasoned, and aligned with relevant planning policy and guidance.

The evidence which I have prepared and provide for this appeal against refusal of application 2024/00668/FUL in this Statement is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

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2. SITE CONTEXT AND OVERVIEW

The site is situated in an area where air quality is primarily influenced by road traffic emissions from the adjacent M62 motorway, located immediately to the south. It lies within Warrington Air Quality Management Area (AQMA) No.1, which was declared along a 50m continuous strip on both sides of the M6, M62 and M56 motorway routes due to potential exceedances of the annual mean nitrogen dioxide (NO₂) objective. This designation demonstrates the potential for elevated pollutant concentrations associated with vehicle emissions at this location. In addition, the site is located approximately 60m east of the Cheshire Free Range Eggs production facility, which accommodates up to 9,000 laying hens (Planning Reference: 2008/12452). This operation represents a further potential source of odour, ammonia and dust emissions, which are typical by-products of intensive poultry farming activities. Accordingly, the proposed development would introduce new sensitive receptors into an area where there is clear potential for deterioration of residential amenity as a result of combined exposure to traffic-related air pollutants and emissions from the adjacent poultry unit. Despite the proximity of these emission sources, no Air Quality Assessment or Odour Assessment has been submitted to accompany the planning application. This omission is contrary to national and local planning policy requirements set out in Section 3.0 of this report, which require such assessments where sensitive receptors may be exposed to elevated pollution levels. The absence of these assessments constitutes a significant technical deficiency, preventing the Local Planning Authority from determining whether the proposed development can ensure an acceptable standard of health, environmental quality and amenity for future occupants. The Environmental Health Officer has raised the following comments in relation to the updated information submitted for the Planning Appeal:

'Air Quality - Ground 3 of Planning Refusal Decision Notice

The appellant has submitted Warrington Borough Council's own Annual Status Report 2024 (ASR) to support the appeal and address the reason for refusal. They have not submitted an actual detailed Air Quality Assessment to consider potential traffic impacts on the site.

Whilst the ASR does conclude that there are currently no exceedances within current Air Quality Management Areas (AQMA) and that the Council will be looking to revoke them, the proposed development will locate new receptors close to the motorway.

Irrespective of the AQMA designation, the development will place new residential units close to a major road and a detailed air quality assessment would still be required.

There are currently no air quality monitoring points close to this location, therefore there remains a lack of information on air quality impacts. It is also noted that traffic flows on this section of the M62 can be variable due to the close proximity to the junction that can cause congestion. Again, this reinforces the need for a detailed air quality assessment.

It is noted that no information has been provided about potential odour impacts from the nearby chicken farm.

The information so far provided has not addressed previous recommendations for refusal on lack of evidence.

Without the information on potential traffic related air quality and odour from the chicken farm, recommendations are unable to be made on the suitability of the development for protection of human health.

The information so far provided has not addressed previous recommendations for refusal based on lack of supporting evidence.'

3. REVIEW OF RELEVANT POLICY AND GUIDANCE

The relevant policy and guidance documents applicable to this Statement are outlined below.

National Planning Policy

National Planning Policy Framework (NPPF) (Updated 2025)

Under Section 15: Conserving and Enhancing the Natural Environment, the NPPF (paragraph 187) requires that *'planning policies and decisions should contribute to and enhance the natural and local environment by ...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.'*

The NPPF (paragraph 110) states that *'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.'* Furthermore, paragraph 198 states *'Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.'*

In dealing specifically with air quality (paragraph 199), the NPPF also states that *'planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan'.*

Paragraph 201 states that *'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'.*

National Planning Practice Guidance - Air Quality (2019)

The National Planning Practice Guidance (NPPG) document for Air Quality provides tailored guidance on how planning can take account of the potential impact of new development on air quality. The document provides useful sources of information relating to the assessment of air quality, outlines when an Air Quality Assessment is likely to be required for planning purposes and provides an example of how such reports should be structured. With regard to mitigation measures, these are development specific, however, the guidance does provide a useful suite of typical measures that can be incorporated into the scheme's design to have a beneficial impact on air quality.

Local Planning Policy

Warrington Local Plan 2021/22 - 2038/39 (2023)

Policy ENV8 'Environmental and Amenity Protection' is relevant to air quality and amenity:

'General Principles

1. *The Council requires that all development is located and designed so as not to result in a harmful or cumulative impact on the natural and built environment, and/or general levels of amenity.*
2. *Development proposals, as appropriate to their nature and scale, should demonstrate that environmental risks have been evaluated and appropriate measures have been taken to minimise the risks of adverse impacts to air, land and water quality, whilst assessing vibration, light and noise pollution both during their construction and in their operation.*

Air Quality

3. *The Council will seek to ensure that proposals for new development will not have an unacceptable negative impact on air quality and will not further exacerbate air quality in the Council's designated Air Quality Management Areas (AQMAs); or will contribute to air pollution in areas which may result in further areas being designated. [...]*
5. *Development proposals for sensitive end uses (including but not limited to residential, schools, nurseries, hospitals) are not desirable where they are located in areas of poor air quality including AQMAs, unless a suitable assessment, review and identification of mitigation to lessen the effects on future site users is provided. An air quality assessment will be required where a development may place new sensitive receptors in areas of poor air quality; and/or that may lead to a deterioration in local air quality resulting in unacceptable effects on human health and/or the environment. [...]*

General Amenity Protection

15. *Where development is considered to be appropriate but may still have impacts on the following environmental considerations, in addition to those detailed above, the Council will consider the use of conditions or planning obligations to ensure any appropriate mitigation or compensatory measures are secured:*
 - a. *Levels of odours, fumes, dust, smoke, insects, litter accumulation, and refuse collection/storage; [...]*
 - b. *Levels of light pollution and impacts on the night sky;*
 - c. *The need to respect living conditions of existing neighbouring residential occupiers and future occupiers of new housing schemes in relation to overlooking/loss of privacy, outlook, sunlight, daylight, overshadowing, noise, vibration and disturbance;*
 - d. *The need to protect existing occupiers and operators in the surrounding area from new development and its potential impacts;*
 - e. *The effect and timing of traffic movement to, from and within the site and car parking including impacts on highway safety;*
 - f. *The ability and the effect of using permitted development rights to change use within the same Use Class (as set out in the Town and Country Planning (General Permitted Development Order) without the need to obtain planning consent.*

16. *Detailed assessments may be required to address any of the above criteria and will need to be submitted to the Council for approval. Where necessary information from assessments is absent to enable consideration of a specific matter, conditions may be recommended or the application refused based on lack of supporting information.'*

Policy ENV8 seeks to protect the environment and amenity of existing and future users, and where development causes or will be subject to negative impacts, make sure that appropriate mitigation or compensatory measures are secured through conditions or planning obligations. Specifically, Policy ENV8 states that the Council will only support development which would not lead to a significant adverse impact on the environment, health and quality of life, or amenity of future occupiers or those currently occupying adjoining or nearby properties and at this stage in the planning application, those conclusions cannot be made.

Furthermore, Policy DC6 'Quality of Place' is also relevant to the proposed development:

Good design should be at the core of all development proposals having regard to the following principles: [...]

- g. Not result in unacceptable conditions for future users and occupiers of the development in accordance with Policy ENV8'.*

Warrington Borough Council Environmental Protection Supplementary Planning Document (2014)

This Supplementary Planning Document (SPD) sets out the Council's approach to assessing planning applications to determine potential impacts on Environmental Protection matters for human health and amenity, and of relevance to this document, air quality and odour.

This document outlines the requirement for when an Air Quality Assessment should be submitted with a planning application, to inform decision making, and includes the appropriate scope of works to be included within such assessments:

'An appropriate assessment of air quality must be included with any planning application that may adversely affect local air quality or that would be located and be unduly influenced upon by existing levels. It is vital that the Applicant/Developer considers the need for any assessment at the project conception stage, as it may not be possible to determine a planning application without first having a proper understanding of the air quality impact. The information required and mitigation measures needed to support an application will depend upon the nature of the development, its location and whether it would contribute to a cumulative impact of traffic which would affect air quality.'

Furthermore, an Odour Assessment is required to be submitted for any development with a potential for emitting odour, or that will add receptors to an area that may then be subject to odour from existing activities.

'Careful consideration needs to be given to the location of new odour sensitive developments such as residential developments [...] near to existing odour sources. Encroachment of odour sensitive development around such odour sources may lead to problems with the site becoming the subject of complaint, essentially creating a problem where there was not one before.'

Assessments are required to be undertaken in accordance with the IAQM 'Guidance on the Assessment of Odour for Planning' document.

Guidance

DEFRA Technical Guidance, LAQM.TG22

LAQM.TG22 sets out detailed guidance on how air quality should be assessed and monitored by local authorities. The document provides useful guidance on how air quality from specific sources should be screened and the approaches that should be used to undertake detailed assessment where potentially significant emissions are identified, including details on model verification and consideration of monitoring data for use in assessments.

IAQM Land-Use Planning and Development Control: Planning for Air Quality (2017)

The Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) have published joint guidance on the assessment of air quality impacts for planning purposes. This includes information on when an air quality assessment is required, what should be included in an assessment and criteria for assessing the significance of any impacts.

IAQM Guidance on the Assessment of Odour for Planning (2018)

The IAQM '*Guidance on the Assessment of Odour for Planning*' document is used to assess impacts relating to odour as part of the planning application process. The guidance sets out the key methodologies for undertaking Odour Assessments, using a range of methods including Field Odour Surveys (Sniff Tests) and desk-based Qualitative Odour Risk Assessments, comprising consideration the source-pathway-receptor approach. The guidance is limited to assessing the effects of odour on amenity, not on human health.

Scottish Environment Protection Agency (SEPA) Odour Guidance (2025)

Guidance produced by Scottish Environmental Protection Agency (SEPA) provides practical guidance on how and why odours occur, how they can be investigated and how they can be mitigated. A table of Hedonic Tone scores is contained within Appendix 1 of the guidance that can be used to identify and quantify the 'unpleasantness' of an odour.

Summary

Professional guidance clearly establishes that developments introducing new sensitive receptors in proximity to major emission sources must be supported by appropriate technical assessments.

The IAQM '*Land-Use Planning & Development Control: Planning for Air Quality*' (2017) states that an Air Quality Assessment is required where a development could introduce exposure near existing pollution sources, including AQMAs and major road links. Similarly, the IAQM '*Guidance on the Assessment of Odour for Planning*' (2018) requires the preparation of an Odour Assessment where sensitive receptors are proposed within the potential zone of influence of odour emitting activities, such as intensive livestock operations.

Given the site's current location within an AQMA, adjacent to the M62 motorway and immediately downwind of a poultry farm, both IAQM guidance documents would necessitate the completion of site-specific air quality dispersion modelling and an odour assessment to quantify pollutant and odour exposure and determine the site's suitability for residential use.

The omission of these assessments represents a clear departure from established professional methodologies and undermines the technical robustness of the planning submission. Consequently, it is unclear whether the proposed development can achieve an acceptable standard of health and amenity for future occupants, which provides a reasonable and evidence-based basis for refusal.

4. INDEPENDENT REVIEW OF SITE SUITABILITY

This section provides an independent review of the site and assesses the suitability of its location for the proposed end use. It draws upon the information presented in the Appellant's Statement of Case, the Council's comments, and other relevant datasets, and offers an expert evaluation of the evidence provided.

Air Quality

Warrington Borough Council undertakes both automatic (continuous) and non-automatic (passive) air quality monitoring across the Borough. Recent data indicate that concentrations of nitrogen dioxide (NO₂) at monitored locations have declined over time, with recent annual means falling below the Air Quality Objective. Consequently, the Council has proposed to revoke the remaining two Air Quality Management Areas (AQMAs) within its jurisdiction, including AQMA No.1, which encompasses the appeal site.

While this trend is encouraging and forms the basis of the Appellant's assertion that air quality in the area has improved, the Appellant's Statement of Case incorrectly infers that compliance at existing monitoring sites demonstrates that residents of the proposed caravan site would not be exposed to elevated pollutant concentrations.

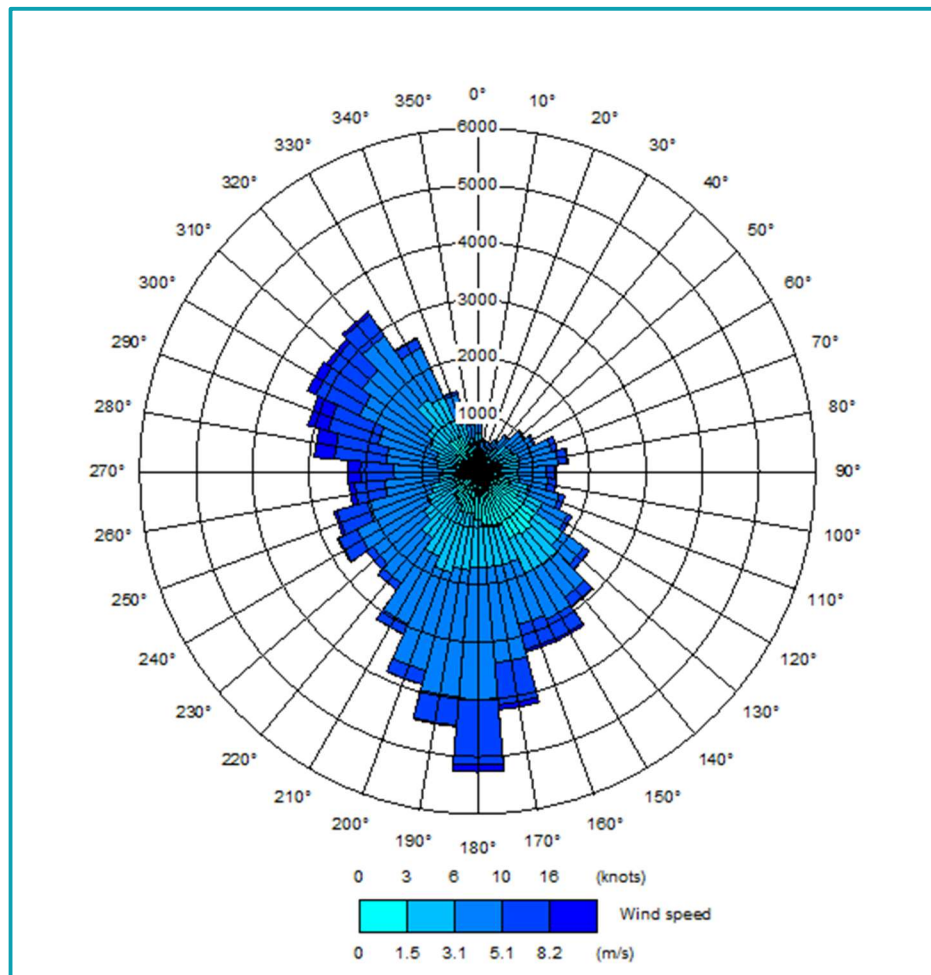
It is noted that the non-automatic diffusion tube sites referred to in the Appellant's evidence - Woolston (DT5, 14.8 miles away), Winwick (DT6, 3.7 miles away), and Birchwood (DT7, 18.7 miles away) - are in materially different environments and at substantial distances from the proposed development. These monitoring locations therefore cannot be considered representative of baseline air quality conditions at a site located within approximately 20m of the M62 motorway, where pollutant concentrations are expected to be significantly higher due to the proximity to the emission source.

To determine whether these monitoring sites could reasonably represent air quality at the appeal site, local meteorological conditions were also reviewed. The nearest suitable long-term dataset is available from the Rostherne No.2 meteorological station, located approximately 12.8km southeast of the site, where meteorological conditions are anticipated to be representative of those occurring at the application site. Analysis of data for the ten-year period 1st January 2015 to 31st December 2024 (inclusive) indicates that the prevailing wind direction is from the south and northwest.

The corresponding wind rose, shown in Figure 1 overleaf, demonstrates that receptors situated to the north and southeast of major emission sources are therefore most likely to experience higher exposure levels under these conditions. Given that the proposed receptors would be located directly north of the M62, and within 20m of the carriageway at the closest location, they would be situated downwind of the motorway for a substantial proportion of the year. This configuration is explicitly recognised in professional air quality guidance as a scenario requiring a detailed site-specific assessment of pollutant concentrations.

Consequently, reliance on distant diffusion tube data is methodologically unsound and therefore fails to robustly demonstrate that the site can achieve acceptable air quality for residential occupation, without risk of exceedance of the air quality objectives.

Figure 1
Wind Rose for Rostherne No.2 (2015-2024)

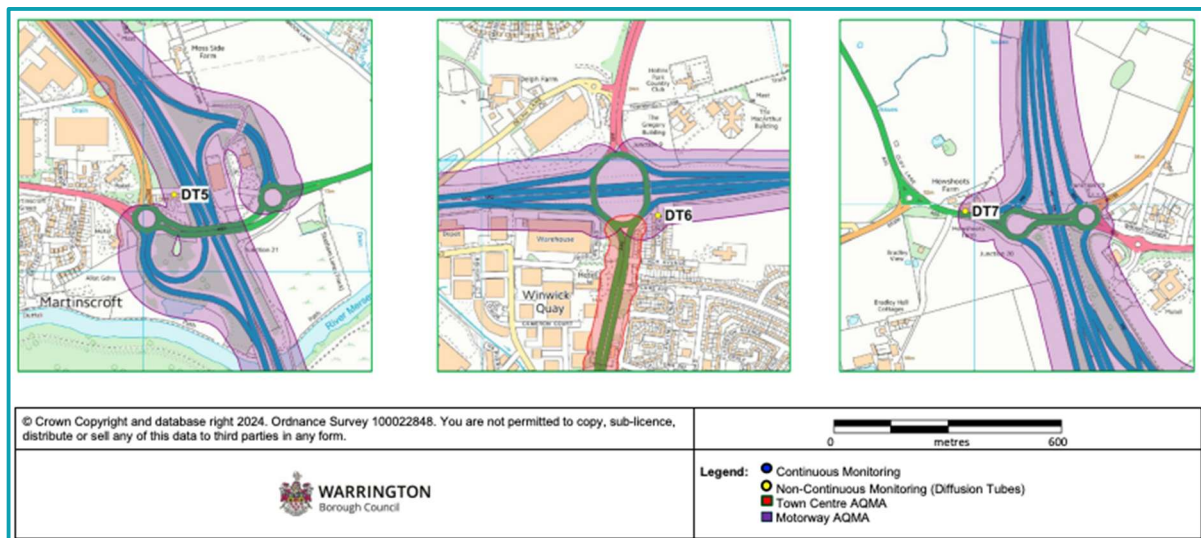


The locations of the motorway diffusion tubes are presented in Figure 2 overleaf. It is noted, however, that no monitoring is undertaken at the motorway junction closest to the Site, namely the M62/M6 Croft Interchange. As illustrated in Figure 2 overleaf, diffusion tubes DT5, DT6 and DT7 are situated to the west or south of the motorway network, where traffic volumes are considered to be highest.

These monitoring locations are positioned on the upwind side of the carriageway relative to the prevailing wind direction shown in Figure 1 and therefore, are unlikely to capture the highest concentrations of road traffic-related pollutants as emissions from the motorway are expected to be transported away from these sites, resulting in lower recorded concentrations.

Consequently, applying these upwind measurements as a baseline for the Site, which lies on the northern side of the M62 and therefore downwind of the emission source, would likely underestimate pollutant levels at the development location. On this basis, these monitoring locations cannot be considered representative of baseline air quality conditions at the Site.

Figure 2
Map of Motorway Monitoring Locations



Therefore, in the absence of any site-specific dispersion modelling or monitoring data, in my professional opinion, it cannot be demonstrated with an acceptable level of confidence that baseline air quality conditions at the Site would comply with the relevant air quality objectives.

Odour and Dust

In the Appellant's Statement of Case, it is stated that *'The Council allege, without evidence, that the proposed caravan site may be subject to odour nuisance from the adjacent poultry farm.'* However, given the site's close proximity to Springfield House Farm, an organic free-range egg production unit housing approximately 9,000 laying hens. In my professional opinion, this concern is entirely reasonable.

In the absence of a site-specific Odour Assessment, the Local Planning Authority cannot determine whether the proposed development would provide an acceptable standard of amenity for future occupants. This omission represents a clear deficiency in the supporting information and in my opinion provides a fair and reasonable basis for refusal of the application.

Poultry farms are recognised sources of odour, dust, bioaerosols and ammonia emissions, which can adversely affect neighbouring sensitive receptors. Such emissions typically arise from manure storage, housing ventilation, shed cleaning, dead stock management, feed handling, and inadequate litter management or air movement. While the Appellant's Statement of Case notes that unpleasant odours are only generated during cleaning (for one or two days every 65 weeks), this statement does not account for the continuous background emissions that may typically occur from poultry housing and associated activities.

Meteorological data from the nearest observation station (as noted above) indicates prevailing winds from the south and northwest, not from the southwest as the Appellant's Statement of Case infers. Based on these conditions, receptors situated to the north or southeast of the poultry farm, as is the case for the proposed caravan site, are likely to experience odour and dust carried downwind. Therefore, residual odour emissions have the potential to affect future site occupants.

No field odour surveys have been undertaken in accordance with IAQM '*Guidance on the Assessment of Odour for Planning*' (2018) to confirm the absence of odour impact at the site.

With regard to dust emissions, these can arise during feed delivery and storage, bird activity, and shed cleaning operations. It is also noted that bulk feed bins are located on the eastern side of the poultry housing, the side nearest to the proposed caravan site. Without evidence confirming that appropriate operational and physical controls are in place (e.g. enclosed transfers, negative pressure systems, or vegetation barriers), there remains a risk of dust dispersion and deposition at the proposed receptor locations.

In my professional opinion, without a robust, site-specific odour assessment, supported by field odour surveys, the potential for significant adverse effects cannot be ruled out.

Were they to occur, any odours associated with poultry operations are expected to have a negative hedonic tone, being unpleasant in character, and therefore likely to detract from residential amenity, contrary to the requirements of the NPPF and relevant local planning policy on protecting health and quality of life.

Review of Previous Planning Application

The closest existing residential dwelling to the poultry farm is the agricultural worker's dwelling (planning reference: 2013/22695), located immediately to the south of the farm. This property lies approximately 50m north of the M62 motorway, at a greater distance from the carriageway than the proposed caravan units, and would therefore experience lower pollutant concentrations from road traffic emissions compared with those likely to be experienced at the appeal site.

It is noted that while planning permission for the agricultural dwelling was granted, this approval was subject to a condition requiring the installation of a specific ventilation scheme due to its location within the AQMA. The condition required that:

'Clean ventilation air shall be brought into each habitable room to minimise the need to open windows on the M62 or Western or Eastern facades for ventilation purposes. The system shall be capable of providing adequate boost abilities to assist with rapid ventilation and summer cooling. [...]

Reason: REP9 Air Quality - To protect the health and amenity of future occupants through the introduction of appropriate mitigation measures for sensitive residential use within the Air Quality Management Area.'

Further commentary from the Public Protection Services Manager (Environment and Public Protection) (document reference: EP/166352) highlighted that the location of the dwelling was '*far from ideal in terms of surrounding environmental impacts, predominantly due to the adjacent motorway network. The presence of this network on the doorstep of the property causes significantly raised noise levels and suggests air quality pollutants will be present over the governmentally recommended levels.*' It was recognised, however, that the dwelling was required for agricultural business purposes, and that '*stringent mitigation measures have been recommended to tackle the worst of the effects of the adjacent motorway network.*'

These remarks demonstrate that the Council's support for the agricultural dwelling was based solely on its essential functional need, with approval contingent upon the implementation of mechanical ventilation to mitigate air quality impacts. In contrast, the proposed caravan site is for residential use only, with no associated business justification, and would be located even closer to the M62 than the approved worker's dwelling.

Mechanical ventilation of the type required under permission 2013/22695 is, in my professional opinion, not feasible for caravans such as those proposed, and therefore, equivalent mitigation cannot be achieved in this case.

Furthermore, the Design and Access Statement accompanying the original poultry farm application (dated January 2008) stated that *'Free Range Units are proven not to cause any disturbances to residential properties at distances greater than 100m.'* With the proposed caravan pitches located approximately 60m to the east of the poultry sheds, it is reasonable to conclude that emissions from the poultry operation are likely to cause disturbance and loss of amenity at the proposed development.

Given the Council's previous reservations about permitting residential development in this area, even for a dwelling with full building fabric and mechanical ventilation mitigation, it is considered highly unlikely that the proposed caravan site, with minimal pollution protection and increased exposure, could be deemed suitable. The historical context clearly reinforces the unsuitability of this location for new sensitive residential receptors.

Unsuitability for Sensitive Receptors

In the absence of any site-specific Air Quality or Odour Assessment, in my professional opinion, the introduction of sensitive residential receptors at this location would be inappropriate. The site is subject to exposure from two interacting pollution sources, road traffic emissions from the adjacent M62 to the south, and odour, dust, and bioaerosol emissions from the intensive poultry farm located immediately to the west. The combined influence of these sources represents a material risk to future occupants, particularly given the lack of assessment to quantify potential exposure levels.

Caravans and mobile homes offer limited protection against external environmental pollutants, as their construction and ventilation standards are considerably less robust than those of conventional residential dwellings. Consequently, internal pollutant concentrations are likely to more closely reflect outdoor air quality conditions. Furthermore, the proposed use of the site for residential caravans implies prolonged outdoor activity, particularly for families and children, thereby increasing exposure to airborne pollutants and odorous emissions.

Given these circumstances, and in the absence of any identified or enforceable mitigation measures, the development fails to demonstrate compliance with Policy ENV8 of the Warrington Local Plan, which requires that development proposals incorporate appropriate mitigation to make sure that there are acceptable levels of environmental quality and amenity.

The proposal therefore does not represent a suitable location for sensitive receptors and presents an unacceptable risk to health and wellbeing in its current form.

Conclusion

In summary, the absence of an Odour Assessment is contrary to established professional guidance, including the IAQM '*Guidance on the Assessment of Odour for Planning*' (2018) and the '*Land-Use Planning & Development Control: Planning for Air Quality*' (2017). Both documents require site-specific assessment where new sensitive receptors are proposed within the potential influence of odour or air pollutant sources.

Furthermore, the failure to provide this evidence conflicts with the NPPF, which requires that new development is appropriate for its location, taking into account the potential effects of pollution on health, living conditions, and the natural environment.

In the absence of the necessary technical assessments, it cannot be demonstrated that the proposed development is appropriately located and would protect future occupants from significant adverse air quality, odour or dust impacts, and therefore, the proposal does not accord with the NPPF, NPPG or relevant local plan policies relating to environmental quality and residential amenity. By failing to quantify or mitigate potential exposure to emissions, the application provides insufficient evidence to demonstrate that the site is suitable for residential occupation.

The findings of the previous planning applications further reinforce the unsuitability of this location for residential occupation. The historical planning context demonstrates that even permanent, purpose-built dwellings in this area required substantial mitigation to achieve an acceptable standard of amenity and were only supported where a functional agricultural need could be justified. In contrast, the current proposal for caravan accommodation provides no such justification and no practical means of incorporating equivalent mitigation measures.

On this basis, the development should not be supported in its current form, and planning permission should be refused until such time that robust and comprehensive technical assessments have been undertaken to demonstrate the suitability of the site for the proposed use.

Yours sincerely,



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For and on behalf of
Dragonfly Consulting