

- 1 Question a) NPPF requires all landowners to agree to the inclusion of their sites. This unique site has not been visited as it is on private land, nor can it be assessed from adjoining public land. The sustainability assessment cannot therefore be sound. In addition, this is a mixed use site; farm, renewable energy and residential.
- 2 Question b) PLP 10 Supporting The Rural Economy, requires KC to ensure proposals would not “adversely affect the management and viability of any farm holding”. However, PLP45 Safeguarding Waste Management Facilities and Infrastructure” is in direct conflict with this policy, since the safeguarding of WS16 would sterilise the site and adjacent farm in perpetuity as a waste facility or “like-minded business”. We are not aware of any other farm AD plant in the country being safeguarded by such a policy.
- 3 NPPF does not require sites to be safeguarded. The safeguarding of the only on-farm anaerobic digestion facility within KC is unnecessary and detrimental to the growth and ongoing viability of the adjacent farm, which are under the same ownership. This is because PLP45 Safeguarding Waste Management Facilities” aims to ensure “sites are not hindered by encroachment of development near to existing sites, which could cause conflict with the existing waste use”. Para 16.15. This restricts agricultural practices to like-minded uses. There is often a synergy and symbiotic co-dependance between farms and biogas farm diversifications. Policy 26, para 12.7 states “renewables ... will be promoted”, but the classification of WS16 as a waste site threatens the long-term viability of the adjacent farm, which in turn affects the AD plant. The enterprises are inextricably linked.
- 4 National Planning Policy for Waste 2014 requires KC to consider “potential land-use conflict”. This has not been considered with respect to WS16, which has “commandeered” existing agricultural land within the waste designation and will safeguard surrounding land to a non-conflicting use. This is unsound, and does not accommodate the needs of the local farm.
- 5 The boundary of WS16 does not follow existing planning permissions, but KC have stated incorrectly in their Council Response that it does. This means areas of a farm used in productive added value agriculture. And in green belt, have been designated as a waste site, which is wholly inappropriate for Place Shaping.
- 6 The area designation has been extended, since the draft consultation and now encroaches on Public Rights of Way(PROW) which is against NPPF. This is a retrospective and permanent change to land use which is detrimental to well-being, since there is no buffer zone between the WS16 and a PROW. The designation is also within 50m of residences and has not met normal planning constraints. This cannot be justified.
- 7 Proposed modification to delete WS16.