

- 1 Question d iv) WS16 contains lagoons which are under agricultural permitted development rights applied for by the farm and owned by the farmer. They have been safeguarded as waste sites, when no other farm in the borough has been safeguarded in this way. This is inconsistent. With the advent of PAS110 (a fertiliser proof of use standard) these lagoons will not be holding waste so should remain as green belt land and their agricultural use. Further some of the waste used on site is potential animal feed but surplus to demand , this would not be safe-guarded on a livestock farm (or recorded as waste by the Environment Agency) why should it be different just because it is going to a different use.
- 2 Question e) WS 16 is unique as being the only on-farm anaerobic digestion facility within KC. It has been included in KC's waste needs as a general waste site. There is no statutory duty under NPPF to safeguard such a site. The designation would have a detrimental effect on the adjacent working farm, which would have to prove any existing and future farm activities “ would have no impact on the digesters”. I would contend this site is exceptional and, as such, should not be designated as a waste site. Further KC's figures for waste bear no relation to the plant throughput as previously stated waste is being replaced by farm crops and any figures cannot be used for a long-term plan.
- 3 KC modifications do not apply to WS16.
- 4 Proposed modification to delete WS16.