

Brookers Farm,
Luddesdown, Gravesend

Transport Statement

LS/OM/37249

December 2025



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1 INTRODUCTION

- 1.1.1 DHA has been commissioned by Vineyard Farms Ltd to provide transport planning advice in support of a full planning application to Gravesham Borough Council (GBC) for the "*Retention/installation of 59 wine tanks and grape presses*" (Ref: 20250840) at Brookers Farm, Luddesdown, Gravesham.
- 1.1.2 The site has a three-year temporary consent for the erection of 41 wine fermentation and storage tanks granted in May 2023 which expires in June 2026 (Ref: 20230454). A further application for nine additional fermentation tanks was determined 'Prior Approval Not Required' in February 2024 (Ref: 20240021). A further two tanks were granted temporary consent in May 2023 (Ref: 20210607) for a 2-year period, which has recently time expired.
- 1.1.3 This report intends to assess the highway impacts of all 59 tanks. 9no. tanks on site have permanent consent, with the application seeking to obtain permanent permission to retain the 43no. tanks currently on-site that have temporary planning permission, as well as an additional 7no. new tanks.
- 1.1.4 This Transport Statement (TS) has been produced in accordance with the Planning Practice Guidance (2014) and Department for Transport (DfT) Circular 01/2022.
- 1.1.5 Following this introduction, the TS is structured as follows:-
- Section 2 summarises the existing transport conditions local to the site;
 - Section 3 sets out the development proposals;
 - Section 4 provides an assessment of compliance with applicable transport planning policy;
 - Section 5 analyses the forecast vehicular trip attraction of the proposals; and
 - Section 6 provides a summary and conclusion.

2 EXISTING TRANSPORT CONDITIONS

2.1 THE EXISTING SITE

- 2.1.1 The site is located in the hamlet of Luddesdown, which is situated in the North Downs, approximately 2.6km to the east of the village of Meopham. Its location is shown in a local context in Figure 2-1 and Figure 2-2.
- 2.1.2 The site is located on Luddesdown Road, next to the Golden Lion public house. There is also a village hall, a church, Court Lodge and a cricket ground nearby.

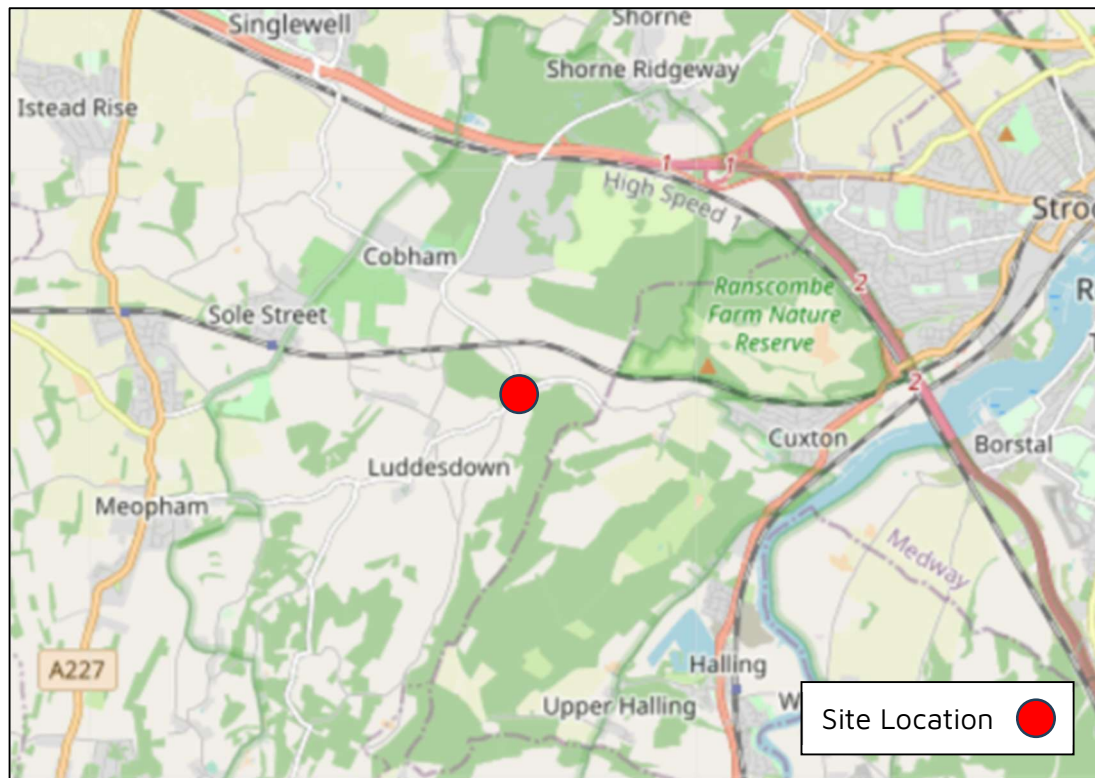


FIGURE 2-1: APPROXIMATE SITE LOCATION (COURTESY OF OPENSTREETMAP.ORG)



FIGURE 2-2: SITE LOCATION – LOCAL AREA (COURTESY OF GOOGLE MAPS)

2.2 LOCAL HIGHWAY NETWORK

- 2.2.1 Brookers Farm is situated on Luddesdown Road, just south of its junction with Henley Street. The local road network consists of mainly single-track rural lanes with a mix of banked and hedged verges and open fields. These lanes are subject to the national speed limit and have little or no street lighting provided on them.
- 2.2.2 The main route to the farm from the strategic road network is via the A2 Cobham Junction and along Halfpence Lane, Cobhambury Road and Luddesdown Road. Halfpence Lane and Cobhambury Road have a two-lane carriageway and centre line and are generally subject to the national speed limit, but with sections of 20mph and 30mph on the approaches to the junction with The Street at Cobham. Luddesdown Road is a single-lane carriageway, though the verges generally allow two vehicles to pass.
- 2.2.3 The main route to the M20 corridor to the south is along Luddesdown Road, Oakenden Road, Foxendown Lane and The Street to meet the A227 at Meopham. While these lanes are single-lane and banked / hedged, the regular accesses along the route provide convenient passing places.

2.3 WALKING AND CYCLING INFRASTRUCTURE

- 2.3.1 There are few footways alongside the highway in the surrounding area, with most walking taking place on the Public Rights of Way (PROW) network. Some of these PROWs run through the site and form part of the Wealdway, a waymarked 80-mile walk from Gravesend to Eastbourne. Local PROWs are shown in Figure 2-3.

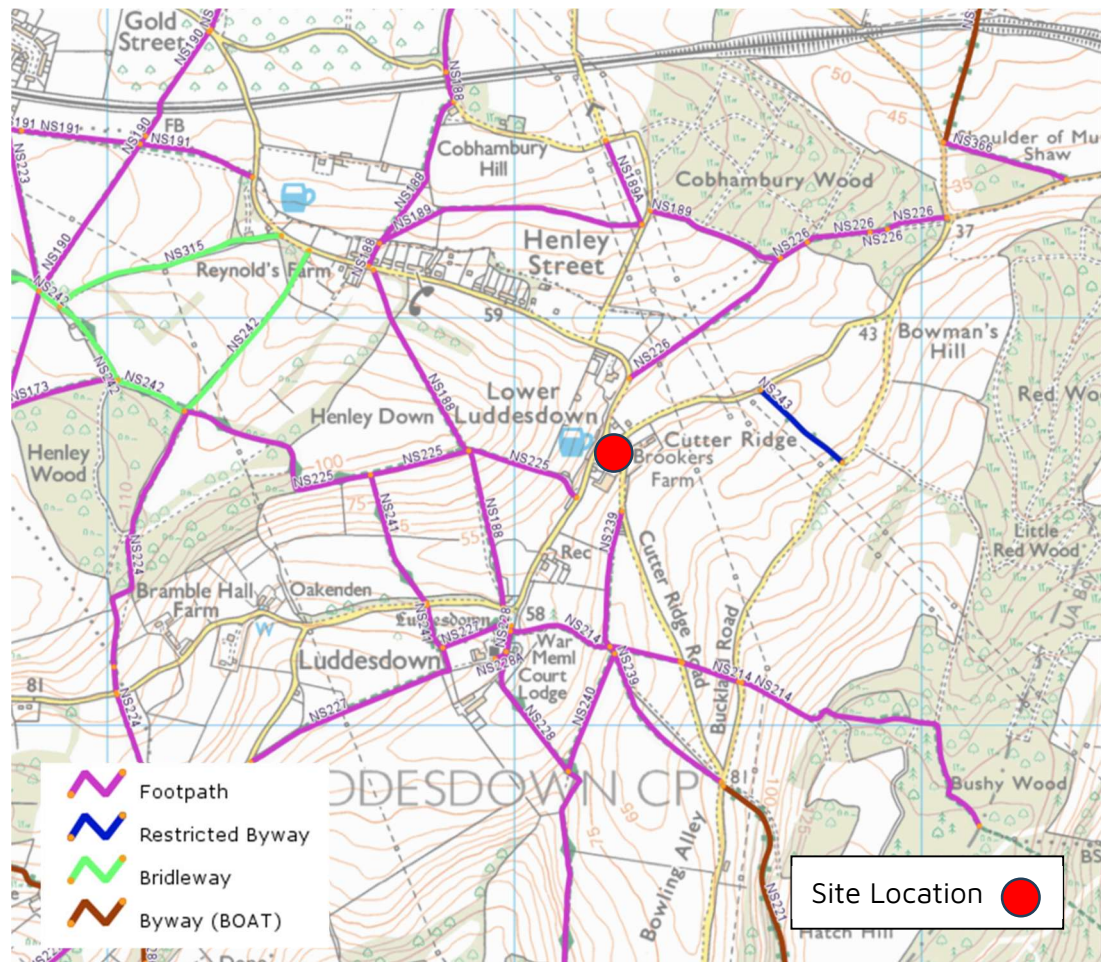


FIGURE 2-3: LOCAL PROW NETWORK (COURTESY OF KENT COUNTY COUNCIL)

- 2.3.2 There are no dedicated cycle routes in the area, the closest being the National Cycle Network route 177 along the A2 corridor between Rochester and Pepper Hill.

2.4 PUBLIC TRANSPORT INFRASTRUCTURE

- 2.4.1 The closest bus stops (The Railway) to the site are located on Camer Road for Sole Street station, approximately 2.7km (or a 38-minute walk¹) via the road network or 2.4km (35-minute walk) via the PRoW network. The northbound features timetable information, a pole and flag and a 'bus stop' marking. There is no infrastructure to indicate the position of the southbound stop.
- 2.4.2 The Redroute 416 bus service runs from Meopham School to Gravesend Railway Station, calling at Sole Street, Shorne Woods Country Park and Denton. It runs five buses on weekdays and three buses on a Saturday, while also operating term-time school services.
- 2.4.3 There are also bus stops (The George) on the A227 Wrotham Road which are a 41-minute walk from the site. A summary of the bus services that call at these stops is provided in Table 2-1; school services have been excluded.

SERVICE NO.	ROUTE	WEEKDAYS	SATURDAY	SUNDAY
308 (Redroute Buses)	Gravesend – Istead Rise – Meopham – Vigo – Borough Green – Sevenoaks	6 buses per school day 5 buses per non-school day	6 buses per day	No service
416 (Redroute)	Meopham School – Sole Street – Shorne Woods Country Park – Denton – Gravesend Railway Station	5 buses per day	3 buses per day	No service

TABLE 2-1: LOCAL BUS ROUTES AND FREQUENCIES (THE GEORGE)

- 2.4.4 The nearest railway station to the site is Sole Street Railway Station (SOR), located approximately 2.7km from the site on the Chatham Mainline. Walking to the station takes around 38 minutes via the road network and 35 minutes via the PRoW network. The station can be cycled from the site in 11 minutes. There are 10 cycle parking spaces located at the eastern end of Station Approach and step-free access is provided for London services via platform 1.
- 2.4.5 Direct services that operate at the station are shown in Table 2-2.

¹ The walk times provided in this report are based on a walk speed of 80m per minute, a figure which is widely used to estimate walk times and used within the Kent Connected online journey planner. It aims to provide a typical average value that estimates it takes 5 minutes to walk 400m, 10 minutes to walk 800m and so on

ROUTE	TYPICAL JOURNEY TIME	WEEKDAY AM PEAK	WEEKDAY PM PEAK	WEEKDAY INTERPEAK	SATURDAY	SUNDAY
London Victoria (VIC) via Denmark Hill	59 mins	SOM to VIC 2tph	SOM to VIC 1tph	SOM to VIC 1tph	SOM to VIC 1tph	SOM to VIC 1tph
Gillingham (GLM) via Rochester	17 mins	SOM to GLM 2tph	SOM to GLM 2tph	SOM to GLM 1tph	SOM to GLM 1tph	SOM to GLM 1tph
Dover Priory (DVP) via Gillingham	1hr 35mins	No Service	No Service	No Service	No Service	SOM to DVP 1tph

TABLE 2-2: DIRECT TRAIN SERVICES AT SOLE STREET RAILWAY STATION

2.5 ACCESSIBILITY

- 2.5.1 The nearest convenience store is located in Sole Street (2.5km / 5-minute drive), but a wider range of services can be found along the A227 corridor within Meopham and Hook Green. Meopham has a medical centre, a dentist and pubs; while Hook Green has a pharmacy, a post office, a mini-supermarket and take-away food outlets.

2.6 HIGHWAY SAFETY

- 2.6.1 The Crash Map database has been analysed for the latest five-year period available (January 2020 to December 2024) to identify the collisions that have occurred in the region of the site. These are shown in Figure 2-4.

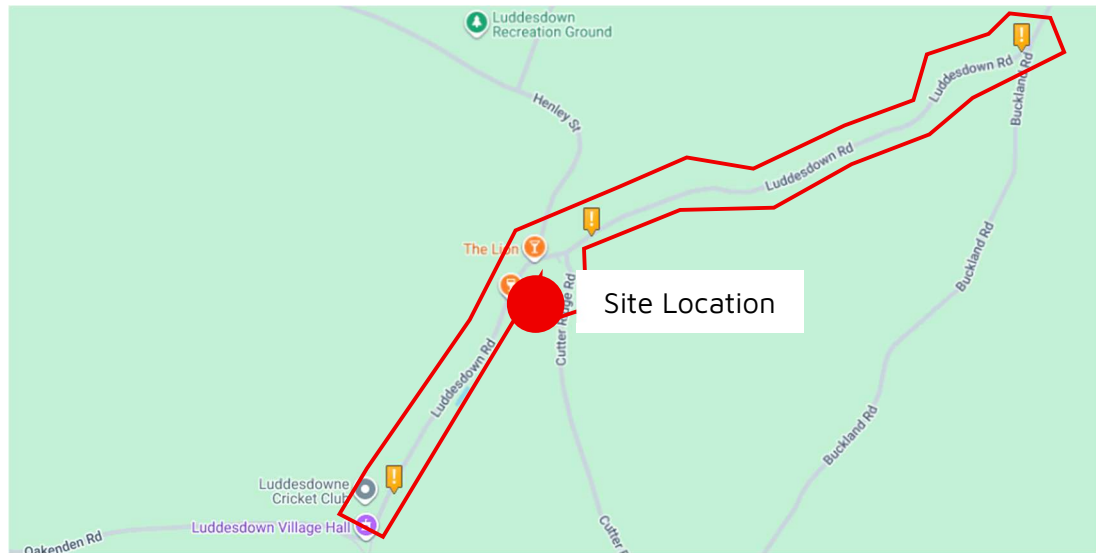


FIGURE 2-4: COLLISION DATA (COURTESY OF CRASHMAP)

- 2.6.2 Three collisions rated 'slight' in severity were found to have occurred within the study network during the five-year study period.
- 2.6.3 One involved a motorcycle and a goods vehicle near the junction of Cutter Ridge Road / Luddesdown Road. Another involved a young car driver near the junction of Oakenden Road / Luddesdown Road. The third involved a car and occurred at the junction of Buckland Road / Luddesdown Road, to the northeast of the site.
- 2.6.4 The collision analysis does not indicate that there are any significant road safety issues in the area surrounding the site that would be exacerbated by vehicle trips associated with the site. There were no clusters of collisions that would indicate any mitigative measures needing to be taken to improve road safety.

3 DEVELOPMENT PROPOSALS

3.1 OVERVIEW

- 3.1.1 The development proposals are for the retention of 52no. tanks and installation of an additional 7no. fermentation tanks / grape presses. These include 9 tanks with permanent permission, 41 with existing temporary permission until June 2026, 2 tanks with recently expired temporary consent, and 7 new tanks. The site layout is provided in **Appendix A**.
- 3.1.2 It should be noted that 52 tanks, have been in situ for three years with the application now seeking permission an additional seven new tanks, which are on-site but are not yet in use. The full construction traffic impact on the site will therefore already be present on the local highway network and there will be no further trips relating to tank installation or delivery.

3.2 ACCESS

- 3.2.1 Primary vehicle access will remain via the existing Brookers Farm estate access. This access is already used regularly by HGVs, and the sightlines and access geometries have been shown to be suitable to accommodate HGVs safely through the previous three years of winery operations.

3.3 PARKING

- 3.3.1 An application for a formalised carpark was approved in February 2024 (Ref: 20240091) to provide 56 additional parking spaces expected to accommodate the 110 employees currently based at Luddesdown. The winery/wine tanks currently employs three FTE persons who work directly in the winery operation.,,. Swept path analysis and visibility splay assessments were undertaken as part of this application and were deemed to be acceptable. The carpark has since been constructed to the south of the main Brookers Farm building.
- 3.3.2 Active electric vehicle (EV) charging points are provided on-site in line with Approved Document S of The Building Regulations. Disabled spaces are available at the main Brookers farmyard including two spaces to the front of the existing office space.
- 3.3.3 Cycle parking facilities are available on-site and will be retained.
- 3.3.4 It is noted that car sharing occurs between staff, with seasonal workers expected to be transported from accommodation in Dartford via electric minibuses to and from the vineyards once a day. There is therefore no parking demand for seasonal workers.

3.4 SITE SERVICING

- 3.4.1 The existing arrangements for the refuse and fire service will be retained. The access routes are sufficient to accommodate a standard fire appliance and there is a refuse store with access via the yard to allow access for a refuse vehicle from Luddesdown Road.

3.5 CONSTRUCTION TRAFFIC MANAGEMENT

- 3.5.1 The 7no. new tanks were delivered to site on the 18th September 2025 and are currently being stored onsite until any planning consent grants their operational use.. As such, there will be no further impact from construction traffic at the site in relation to this application.

4 TRANSPORT PLANNING POLICY

4.1 OVERVIEW

- 4.1.1 This section sets out the relevant planning policies relating to this application. Please note that the application site is located within the jurisdiction of the Local Planning Authority; Gravesham Borough Council (GBG).

4.2 NATIONAL PLANNING POLICY FRAMEWORK (NPPF, 2024)

- 4.2.1 The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other developments can be produced. The NPPF is a material consideration in planning decisions.
- 4.2.2 Paragraph 116 states that: *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, following mitigation, would be severe, taking into account all reasonable future scenarios."*
- 4.2.3 Paragraph 117 then notes within this context, that applications for development should:
- (a) *"Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
 - (b) *Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
 - (c) *Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
 - (d) *Allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
 - (e) *Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations".*
- 4.2.4 Paragraph 118 states that: *"All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport*

assessment so that the likely impacts of the proposal can be assessed and monitored."

4.3 DEPARTMENT FOR TRANSPORT (DFT) CIRCULAR 01/2022 – THE STRATEGIC NETWORK AND THE DELIVERY OF SUSTAINABLE DEVELOPMENT (2022)

4.3.1 DfT Circular 01/2022 states at Paragraph 11 that National Highways will:-

"...act in a manner which conforms to the principles of sustainable development. In this context the company's licence agreement defines sustainable development as encouraging economic growth while protecting the environment and improving safety and quality of life for current and future generations. Alongside this, the company has an important role to play in the drive towards zero emission transport through its commitment to net zero maintenance and construction emissions by 2040 and net zero road user emissions by 2050, and its role as a statutory consultee in the planning system."

4.3.2 The Circular further advises at Paragraph 12 that:-

"New development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable", and that "Developments in the right places and served by the right sustainable infrastructure delivered alongside or ahead of occupancy must be a key consideration when planning for growth in all local authority areas."

4.3.3 In relation to Transport Assessments, the Circular states at Paragraph 48 that:-

"Where a Transport Assessment is required, this should start with a vision of what the development is seeking to achieve and then test a set of scenarios to determine the optimum design and transport infrastructure to realise this vision. Where such development has not been identified in an up-to-date development plan (or an emerging plan that is at an advanced stage), developers should demonstrate that the development would be located in an area of high accessibility by sustainable transport modes and would not create a significant constraint to the delivery of any planned improvements to the transport network or allocated sites."

4.4 PLANNING PRACTICE GUIDANCE (PPG, 2014)

4.4.1 The PPG was published in March 2014 as a supporting resource in conjunction with the NPPF, which is also a material consideration in determining planning applications. With respect to transport, the PPG includes a section titled 'Travel Plans, Transport Assessments and Statements in Decision-Taking'. This provides

general guidance on the process of producing these documents, from which the following key points are expressed.

- 4.4.2 Regarding the purpose of a Transport Assessment or Statement, it is noted that:-

"The Transport Assessment or Transport Statement may propose mitigation measures where these are necessary to avoid unacceptable or "severe" impacts. Travel Plans can play an effective role in taking forward those mitigation measures which relate to on-going occupation and operation of the development."

- 4.4.3 In terms of parking provision, the requirements are set out by local guidance (see below); however, further to the NPPF, the following should be taken into consideration (Paragraph 8):-

"Maximum parking standards can lead to poor quality development and congested streets, local planning authorities should seek to ensure parking provision is appropriate to the needs of the development and not reduced below a level that could be considered reasonable."

4.5 KCC LOCAL TRANSPORT PLAN 5 (LTP5): STRIKING THE BALANCE (2024-2037)

- 4.5.1 The Local Transport Plan 5 (LTP5) was adopted by KCC in December 2024 and runs from 2024 to 2037. The Plan sets the overall strategy and direction for transport in Kent over the medium-term.

- 4.5.2 The Plan includes details on how the County Council will meet its transport ambition for Kent, which is:-

"...to improve the health, wellbeing, and economic prosperity of lives in Kent by delivering a safe, reliable, efficient and affordable transport network across the county and as an international gateway. We will plan for growth in Kent in a way that enables us to combat climate change and preserve Kent's environment."

"We will do this by delivering emission-free travel by getting effective dedicated infrastructure to electrify vehicles, increase public transport use and make walking and cycling attractive. This will be enabled by maintaining our highway network and delivering our Vision Zero road safety strategy. These priorities will ensure our networks are future-proof, resilient and meet user needs."

- 4.5.3 This ambition will be realised through a number of targeted, overarching policies which will aim to deliver specific outcomes for the county. Those applicable to the development proposals are:-

"Outcome 2: *Deliver our Vision Zero road safety strategy through all the work we do.*

Policy A): Achieve a fall over time in the volume of people killed or very seriously injured on KCC's managed road network, working towards the trajectory set by Vision Zero for 2050.

Outcome 5: *Deliver a transport network that is quick to recover from disruptions and future-proofed for growth and innovation, aiming for an infrastructure-first approach to reduce the risk of highways and public transport congestion due to development.*

Policy B): Reduce the amount of forecast future congestion and crowding on highways and public transport that is associated with demand from development by securing funding and delivery of our Local Transport Plan.

Outcome 7: *Road-side air quality improves as decarbonisation of travel accelerates, contributing towards the pursuit of carbon budget targets and net zero in 2050.*

Policy A): Reduce the volume of carbon dioxide equivalent emissions entering the atmosphere associated with surface transport activity on the KCC managed highway network by an amount greater than our forecast "business as usual" scenario. This means achieving a greater fall than those currently forecast of 9% by 2027, 19% by 2032 and 29% by 2037.

Policy B): No area in Kent is left behind by the revolution in electric motoring, with charging infrastructure deployed close to residential areas, to reduce barriers to adoption.

Outcome 8: *Better health and wellbeing*

Policy A): We will aim to obtain further funding to deliver the outcomes of our Bus Service Improvement Plan (or its successor) beyond its current horizon of 2024/25. We will ensure that our Local Transport Plan proposals are clearly evidenced in terms of their contribution towards achieving our Bus Service Improvement Plan.

Policy B): We will identify and support industry delivery of priority railway stations for accessibility improvements and route improvements to reduce journey times and improve reliability.

Outcome 9: *Health, air quality, public transport use, congestion and the prosperity of Kent's high streets and communities will be improved by supporting increasing numbers of people to use a growing network of dedicated walking and cycling routes.*

Policy A): We will aim to deliver walking and cycling improvements at prioritised locations in Kent to increase activity levels and support Kent's diverse economy, presented in a Kent Cycling and Walking Infrastructure Plan."

- 4.5.4 Within a section dedicated to 'Development Management Principles, LTP5 sets out a number of further county-wide strategic aims:-

"To ensure Local Planning Authorities and developers work effectively with KCC to effectively design development and local transport so as to reduce its pressure on the existing road network and embed sustainable travel from the start.

To implement an infrastructure-first approach to secure initial improvements to the whole transport system to reduce pressure on the road network.

To recognise the uncertainty in how occupants of new developments will travel by assessing a range of outcomes and ensuring the right mitigations are implemented in response to observed impacts."

- 4.5.5 To achieve the above aims, KCC have stated that they will work with Local Planning Authorities to deliver a 'decide and provide' approach. In line with the aim to strike the balance between modes, and with the recognition that car use remains by far the most popular mode of transport in the county, KCC hope that this approach will help support a greater choice of transport modes, to help reduce pressure on the existing network, whilst also addressing impacts that do require mitigation.

4.6 GRAVESHAM LOCAL PLAN CORE STRATEGY (2014)

- 4.6.1 The Core Strategy was adopted by Gravesham Borough Council (GBC) in September 2014 and is the Council's principal document within its Local Plan, setting out the main planning policy objectives for the Borough up to 2028.

- 4.6.2 Regarding transport, there are a number of Strategic Objectives:-

"SO7 Enhance the Borough's public transport network to serve existing and new neighbourhoods and communities in Gravesend, Northfleet and Ebbsfleet.

SO15 Improve opportunities for recreation, sport, walking and cycling.

SO17 Increase accessibility, reduce the need to travel, minimise congestion and improve air quality through the improved provision of local public transport and the provision of local jobs and services."

- 4.6.3 Strategic Policy CS11 (Transport) states the following:-

"New developments should mitigate their impact on the highway and public transport networks as required. As appropriate, transport

assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel...

Sufficient parking in new development will be provided in accordance with adopted standards which will reflect the availability of alternative means of transport and accessibility to services and facilities...

The Council will seek improvements to walking and cycling facilities and networks in the Borough including provision in new development as appropriate..."

4.7 GRAVESHAM LOCAL PLAN FIRST REVIEW (SAVED POLICY) (2014)

- 4.7.1 Although the adopted Core Strategy replaces a number of the policies contained within the Local Plan (First Review), those which were 'saved' by the Secretary of State will remain applicable in the determination of planning applications.
- 4.7.2 Policies T1 to T3 are in accordance with general policy outlined by the Local Highway Authority with respect to the use of the highway network. These are set out as follows:-

POLICY NAME	POLICY DESCRIPTION
Policy T1:	The Local Planning and Highway Authorities will consider the impact on the transport system and on the environment of traffic generated by new development and will wish to ensure that all proposed developments are adequately served by the highway network identified on the Proposals Map.
Policy T2:	The Local Planning and Highway Authorities will seek to channel all traffic travelling through Gravesham on to the primary road network and to channel traffic between and within residential, industrial and principal business districts of the Borough onto the district distributors.
Policy T3:	The Local Planning and Highway Authorities will not normally permit any proposed development that generates significant volumes of commercial vehicle traffic, if it is not well related to the primary and district distributor network.
Policy T4	The Local Planning and Highway Authorities will not normally permit any proposed development outside the confines of the built up area that generates significant vehicular or pedestrian traffic.
Policy T5	The formation of new accesses or the intensification of use of existing accesses to the roads forming the highway network shown on the Proposals Map, will not normally be permitted, except where no danger would arise and where a properly formed access can be created in a location and to a standard acceptable to the Local Planning and Highway Authorities.
Policy P3	The Borough Council will expect development to make provision for vehicle parking, in accordance with the Kent County Council Vehicle Parking Standards, as interpreted by Gravesham Borough Council, unless

justified as an exception. All vehicle parking provision should normally be made on the development site. In the case of proposals for development in Class B1, as defined in the Town and Country Planning (Use Classes) Order 1987, the Borough Council will expect car parking provision to be made at the standard for offices and will also require lorry parking and manoeuvring areas to be provided, unless the applicant is willing to enter into an agreement to restrict the uses to which the permission relates.

4.8 PARKING POLICY

Vehicle Parking

4.8.1 Parking policy guidance and standards for non-residential developments in Kent are laid out in the Kent County Council Parking Standards 2025. This outlines the maximum parking standards required for Sui Generis land uses, which are shown in Figure 4-1.

Other Uses		1 space per 22m ²
Notes:	1. Adequate facilities should be provided to enable delivery vehicles to park and manoeuvre clear of the public highway. 2. Provision should also be made for coach parking with a maximum standard of 1 coach space per 300 seats. Such provision is to be provided as an alternative to car parking provision. 3. Where provisions are made within the development to accommodate spectators then an additional parking provision of 1 space per 15 seats should be provided. 4. Provision should also be made for coach parking with a maximum standard of 1 coach space per 5,000 visitors per annum	

FIGURE 4-1: EXCERPT FROM KENT PARKING STANDARDS 2025 – (COURTESY OF KENT COUNTY COUNCIL)

Cycle Parking

4.8.2 Cycle parking requirements are set out in the KCC Parking Standards 2025. This outlines the minimum parking standards required for a Sui Generis land use, which are to be determined on a first principals basis.

Electric Vehicle (EV) Charging

4.8.3 Electric Vehicle (EV) charging points should be provided in accordance with Part S of the Building Regulations (Requirement S4) which requires that one parking space should have access to an ‘active’ charging point and that one fifth of the remaining spaces should be afforded ‘passive’ provision (i.e. cable routes for future charging points).

5 TRIP GENERATION / ATTRACTION AND TRANSPORT IMPACTS

5.1 OVERVIEW

- 5.1.1 This section outlines the methodology employed to calculate the likely vehicle trip attraction of the proposed development.
- 5.1.2 Trip generation / attraction for the proposed development has been derived from information provided by the client based on operational knowledge of the site and wider industry practices. The derived trip generation / attraction therefore reflects the specific characteristics of the site and volume of production, as well as volume and type of vehicle movements.

5.2 PROPOSED DEVELOPMENT VEHICLE TRIP GENERATION / ATTRACTION

Delivery of produce to site

- 5.2.1 All grapes from the surrounding land at Luddesdown are brought to Brookers Farm at harvest using tractors and trailers only. The grapes come straight from the land from the vines to the grape presses typically at harvest during August/September. There are no associated HGV movements with this process. This is an existing lawful agricultural operation that is not subject to planning control.

Wine making

- 5.2.2 The grapes are pressed on site and distilled as required into the various wine vats. The wines are 'made' over various periods of time depending on the targeted vintage and what is being made i.e. wine, sparkling wine, champagne etc.
- 5.2.3 There will be a low number of HGV visits to the site to deliver bottles, labels, yeast and other products over the course of a year. These movements are incorporated into the total movement figures set out under 'Distribution of wine' below.

Distribution of wine

- 5.2.4 Once the wines are 'made' they are bottled and labelled in the adjacent building and packed onto crates for onward distribution (unless being sold in the on-site shop or the Lion pub) via 26 tonne rigid body HGVs.
- 5.2.5 Using data collected during the last three years associated with the winery and the use of the 52 tanks on site, Vineyard Farms has calculated that the addition of 7 further tanks to the 52 existing equates to approximately 230,000 additional bottles worth of wine production per year. This volume of production is equivalent

to one additional HGV trip per month over and above those generated by the existing and operational 52 tanks.

- 5.2.6 The total number of HGVS movements associated with all 59 tanks will generate approximately 104 HGV movements (52 arrivals/52 departures) per year equivalent to 8 HGV trips per month or two per week. During peak times HGV movements may be more frequent (August/September harvest and December) whereby weekly movements may increase to 3 – 5 movements per week but consequently reduce during quieter months.

Fall Back Position

- 5.2.7 If Vineyard Farms are not permitted to keep the 59 wine tanks on site, then all produce would be required to be transported off site by HGV ultimately increasing total HGV movements. This would be permissible without consent from the Council.
- 5.2.8 The more likely fall back that would be utilised, from site, agricultural permitted development rights applied for and then all the tanks could come back again, and the Council would have no mechanism for refusal on highways grounds.

Management of HGV Trips

- 5.2.9 It is accepted that a temporary consent for the 43 wine tanks was granted to assess the impact of the development over a limited period of time, and that objections have been raised due to an intensification of operations in the local area, including HGV movements. It is important to note that there is an established agricultural operation at Brookers Farm, which will inherently generate a baseline level of HGV trips. This is typical of any farm, which will routinely operate tractors and other farm vehicles / equipment, and will require deliveries. These operations will intensify seasonally for harvesting and due to the expansion of the farm activities overall.
- 5.2.10 Any HGV movements directly associated with wine distribution would be infrequent and scheduled outside of the network peak hours to minimise impacts on the operation of the local highway network. This includes the AM and PM network peak hours (0800-0900, 1700-1800) and outside of night-time hours (2300-0700) for the amenity of the residents in the local villages.
- 5.2.11 It would not be possible to manage the movements and timings associated with the agricultural operation of harvesting grapes and any other purpose associated with agricultural uses within the landholding, as this would impact the seasonal harvesting. As raised previously, most fruit transport takes place internally and any agricultural traffic that does occur on the local highway network is within the lawful use of the land and should be expected within the rural setting in which the site resides.

HGV Routing

- 5.2.12 All HGV vehicles associated with the tanks use/will use the the existing vehicle routing strategy when entering or leaving the site. Vehicles can utilise Luddesdown Road leading west to Warren Road and the A228 as shown in Figure 5-1.

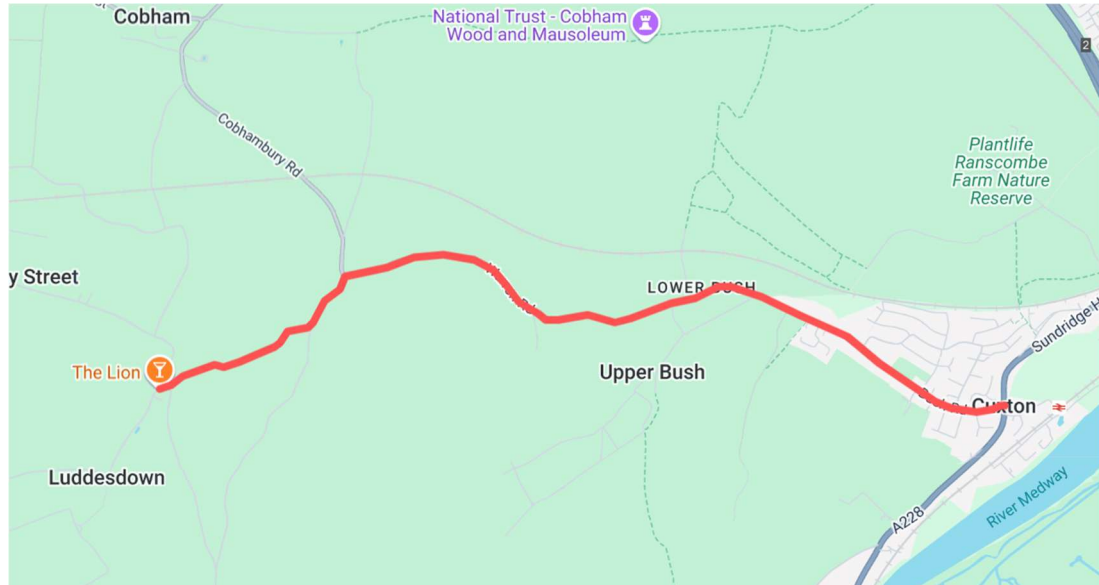


FIGURE 5-1: PROPOSED CONSTRUCTION VEHICLE ROUTING STRATEGY

- 5.2.13 There are several established passing points along Luddesdown Road and Warren Road to allow delivery vehicles to pass light vehicles and there is suitable forward visibility due to the generally straight alignment of the route. The A228 is located just 1km from the Merralls Shaw Interchange which provides access to the M2.
- 5.2.14 Measures have already been put in place to limit the impact of the existing HGV traffic on the network, including sign installation at the top of Henley Street, Gold Street, and The Street (Meopham) stating no access to Vineyard Farms Limited by HGVs.
- 5.2.15 HGVs already use Luddesdown Road for farm access and based on the absence of restrictions, the above route is considered suitable for HGV traffic. Arrival and departures to the farm will be managed to prevent the unlikely event of HGVs meeting on this route from opposite directions.
- 5.2.16 Furthermore, only small 26 tonne rigid body lorries are used by the Vineyard, and no arctic lorries.

Staff Trips

- 5.2.17 There are currently three full time staff and one part time employee working in the winery. One of the employees lives on-site and would be likely to take an 'active travel' mode to work or would travel internally through the site. For the purposes of this assessment, it is assumed that the remaining three staff travel individually by car which results in a maximum of six daily trips including three arrivals and three departures in the AM and PM peak hours. These staff park in the new on-site car park.
- 5.2.18 Staff trips are expected to occur outside the peak visitor periods.
- 5.2.19 It should be noted that the winery staff do not undertake other duties on the farm and therefore these trips would not occur if wine processing occurred off-site.

Highways Impact

- 5.2.20 It is recognised that there are specific concerns from local residents about HGVs routing through Cuxton. In response to these concerns, reference can be made to a recent appeal where the applicant sought consent for a new winery and visitor centre on 'Land south of Bush Road' (Ref: APP/A2280/W/22/3307648). While the scheme was refused locally and at Appeal, the Planning Inspector concluded that there were no highways grounds for refusal with particular reference to Bush Road. That proposal anticipated to generate up to 12 HGV and coach trips per day, and the Inspector concluded that these movements could be accommodated along Bush Road without adversely affecting traffic flow of traffic or highway safety. In comparison, the current proposals are considered to have a negligible impact.
- 5.2.21 Overall, the impact of the 59 wine tanks is considered minimal and would not constitute a severe impact on the highway network in accordance with the NPPF.

6 SUMMARY AND CONCLUSION

- 6.1.1 This Transport Statement has been prepared on behalf of Vineyard Farms in support of the proposed development for the retention and installation of 59 wine tanks and grape presses at Brookers Farm, Luddesdown, Gravesham.
- 6.1.2 Following a review of national and local transport planning policy, no conflicts are envisaged. A review of the local highway safety record has concluded that the proposed development should have no material adverse impacts in this regard.
- 6.1.3 The existing access, servicing and parking arrangements will be retained as they are already in use and considered suitable to serve the proposed development. It is noted that 52 of the wine tanks are already present on-site and operational and thus already generate HGV movements. The existing access had been demonstrated to accommodate these safely.
- 6.1.4 Trip generation forecasts have been based on information provided by the client and informed by operational knowledge of the existing site. It has been demonstrated that the 59 tanks when fully operational have the capacity to generate approximately 2 HGV trips per week, and a likely peak of 3-5 movements per week during peak harvest and in December. The winery generates a maximum of 6 daily staff vehicle trips. It is not considered that this represents a 'severe' residual impact with reference to Paragraph 115 of the National Planning Policy Framework.
- 6.1.5 Given the above, and with reference to the highway's conclusions found within the Bush Road Winery application, it is concluded that the proposed development should not have any material adverse transport impacts and therefore there should be no sound transport-based objections to the planning application.

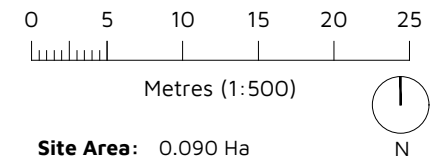
APPENDIX

A





Proposed Site Layout Plan
1:500 @ A3



- Site Area:** 0.090 Ha
- Application Boundary
 - Applicant Ownership
 - 5No. Tanks with Prior Approval under Permitted Development Rights
 - 42No. Tanks with Temporary Planning Permission expiring in Summer 2026
 - 12No. Additional Tanks

Rev: Reason: Date:

Client:

VINEYARD FARMS

Project:

CELLAR DOOR, LUDES DOWN,
GRAVESEND, KENT, DA13 0XE

Title:

PROPOSED SITE LAYOUT PLAN

Drawing No: DHA/36436/05 Rev: 1 Scale: 1:500 Date: AUG 2025



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