

# Delegated Report

## *Full Planning Application*

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| <b>Planning Application No:</b> | 20260696                                                                                                                                                                                                                                                                                                                                 |
| <b>Location:</b>                | Queens Farm Queens Farm Road Shorne Gravesend                                                                                                                                                                                                                                                                                            |
| <b>Description:</b>             | Change of use of the existing livestock building to create x5 light industrial (Use Class Eg(iii)) / storage (Use Class B8) units with x1 agricultural unit and installation of roof-mounted solar panels, along with the conversion of an existing agricultural unit in a building to the west of the site to a workshop (Use Class E). |
| <b>Applicant:</b>               | Evesham Properties Limited                                                                                                                                                                                                                                                                                                               |
| <b>Site Visit Date:</b>         | Desktop assessment                                                                                                                                                                                                                                                                                                                       |

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### Submitted Plans

Drawing no. 9446-A-L-(01)-0001 Rev. P01 (Site Location Plan)  
Drawing no. 9446-A-L-(01)-0002 Rev. P01 (Existing Block Plan)  
Drawing no. 9446-A-L-(01)-0004 Rev. 1st (Existing Elevations)  
Drawing no. 9446-A-L-(01)-0003 Rev. P01 (Existing Floor Plans and Elevations)  
Drawing no. 9446-A-L-(01)-0005 Rev. P01 (Existing Barn 02 Elevations and Floor Plan)  
Drawing no. 9446-A-L-(01)-0006 Rev. P01 (Existing Barn 02 Plans and Sections)

Drawing no. 9446-A-L-(03)-0001 Rev. C (Proposed Block Plan)  
Drawing no. 9446-A-L-(03)-0002 Rev. D (Proposed Plans and Section)  
Drawing no. 9446-A-L-(03)-0003 Rev. C (Proposed Elevations)  
Drawing no. 9446-A-L-(03)-0004 Rev. P01 (Proposed Barn 02 Elevations and Floor Plan)  
Drawing no. 9446-A-L-(03)-0005 Rev. P01 (Proposed Barn 02 Plans and Section)  
Drawing no. Q53071\_001 (PV Layout)  
Drawing no. Q53071\_002 (Side Elevations)  
Drawing no. Q53071\_003 (Detailed PV Layout)

### Supporting Documents:

Application form  
Planning Statement (1<sup>st</sup> July 2026)  
Design and Access Statement (22.05.2026)  
Transport Statement (11 June 2026)  
BREEAM Refurbishment 2014 Pre-assessment (20/05/2026)  
Energy Statement (25 June 2026)  
Flood Risk Assessment (14<sup>th</sup> May 2026)  
Heritage Statement  
Noise & Vibration Impact Assessment (May 2026)  
Preliminary Roost Assessment (Bats) and Nesting Bird Assessment  
Justification Statement (June 2026)  
Photographs of Queens Farm

### Superseded:

Drawing no. 9446-A-L-(03)-0001 Rev. P02 (Proposed Block Plan)

Drawing no. 9446-A-L-(03)-0002 Rev. P01 (Proposed Plans and Section)  
Drawing no. 9446-A-L-(03)-0003 Rev. P01 (Proposed Elevations)

## Relevant Planning History

The below application is most relevant to the proposed development:

| Reference | Description                                                                                                                                                                                             | Decision  | Decision Date |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|---------------|
| 20181303  | Prior notification under Part 3 Class R of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) for the change of use from agriculture to B1 (Business use). | Granted   | 19.02.2019    |
| 20020268  | Formation of a replacement farm yard consisting stockyard/cattle building, grain store & workshop building.                                                                                             | Permitted | 28.05.2002    |
| 20000456  | Formation of a replacement farm yard consisting stockyard/cattle building, grain store and workshop building.                                                                                           | Refused   | 26.11.2001    |

## Development Plan

### Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS07 – Economy, Employment and Skills
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development and Design Principles
- CS20 – Heritage and the Historic Environment

### Gravesham Local Plan: First Review (1994)

- TC3 – Development affecting Conservation Areas
- TC7 – Other Archaeological Sites
- T1 – Impact of Development on Highway Network
- T5 – Access to the Identified Highway Network
- P3 – Vehicle Parking Standards

As set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012 policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Such reviews are also a legal requirement

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2026), the Council will also seek to replace these.

### National Planning Policy Framework (2026)

- Section 4 – Achieving sustainable development
- Section 5 – Meeting the challenge of climate change
- Section 7 – Building a strong, competitive economy
- Section 10 – Securing clean energy and water
- Section 12 – Making effective use of land
- Section 13 – Protecting Green Belt Land
- Section 14 – Achieving well-designed places

- Section 15 – Promoting sustainable transport
- Section 17 – Pollution, public protection and security
- Section 19 – Conserving and enhancing the natural environment
- Section 20 – Conserving and enhancing the historic environment

#### Supplementary Planning Guidance

- SPG4 – KCC Parking Standards (2006)
- Gravesham Landscape Character Assessment (2009)
- Design for Gravesham – Design Code (2024)
- Queens Farm Rural Conservation Area Appraisal Supplementary Planning Document (2017)

### **Emerging Local Plan as a Material Consideration**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 (Planning and Compulsory Purchase Act 2004) and section 70(2) of the Town and Country Planning Act 1990 (Town and Country Planning Act 1990) make it clear that planning applications can only be determined in accordance with the development plan, unless material considerations indicate otherwise.

Decision Making Policy DM4 of the Framework sets out that when considering development proposals, relevant policies may be given weight, however, this is subject to:

- The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- The degree of compliance of the relevant policies in the emerging plan with the policies for plan-making in this Framework (the closer the policies in the emerging plan to the policies in this Framework, the greater the weight that may be given to them).

West Oxfordshire District Council v Secretary of State for Housing, Communities and Local Government & Rosconn Strategic Land Ltd [2018] EWHC 3065 (Admin) is a High Court judgement that deals with the weight to be given to a Regulation 19 Local Plan. In this judgement, the Court found that the weight to be given to an emerging Local Plan was a matter of planning judgement, which had to be reached having fully considered the relevant part of the Framework, which from 17 August 2026 Decision Making Policy DM4 of the Framework.

The Council's emerging Local Plan has reached the Regulation 19 Consultation stage, with the consultation having ended on 18 August 2026. The emerging Local Plan does not form part of the Development Plan.

The Council is aware that third parties have raised objections to the wider emerging Local Plan and specific policies within it. Therefore, at present the Council cannot categorically state that the emerging Local Plan can be considered sound and consistent with the National Planning Policy Framework (2024) [as an emerging Local Plan being brought forward under the legacy system, it would be examined under the 2024 Framework]. Taking this into consideration, one can only conclude that at this stage of the process, **limited (i.e. minimal) weight should be afforded to the emerging Regulation 19 Local Plan**. This position would only change once the emerging Local Plan has progressed towards submission and examination, with the Council being fully aware of policies that are subject to unresolved objections and with knowledge of policies that have had their soundness and conformity against the Framework challenged.

This approach accords with the approach taken in a separate High Court case, Gladman Developments Ltd v SSHCLG & Corby Borough Council; & Uttlesford DC [2020] EWHC 518 (Admin) and Court of Appeal [2021] EWCA Civ 104, which was also the subject of a Court of Appeal Ruling [2021] EWCA Civ 104.

### **Consultations, Publicity and Representations**

#### Consultees

### Dickens' Country Protection Society

The Society has no objection to the conversion of the existing building but considers the use needs to be contained. These were new buildings to replace existing; erected isolated on an open field in the Green Belt.

The Society would strongly suggest that if conversion is allowed, permitted development rights are withdrawn in order to maintain close control of the site.

The Society would question permitting storage (Use Class B8) since this may result in large numbers of vehicle movement on an inadequate road network.

The Society would suggest that conditions are imposed to control parking on site (minimum requirements and upper limit) too ensure that adequate parking is provided and prevent the storage of vehicles on site; no outside general storage should be permitted - in the interest of local amenity.

The comments are made particularly bearing in mind the breaches that have occurred in the adjacent Apex Business Park.

### Environment Agency

Thank you for consulting us on the above application which we received on 29 July 2026. As part of this consultation, we have reviewed the following documents and those available on the planning portal:

- Flood Risk Assessment (J102324, 14 May 2026, Hobbs and Parker)

#### Environment Agency position

We have no objection to the development based on the information available. The development is within Flood Zone 1 and outside of the modelled flood extents.

Please refer to the following sections for our full response:

- Section 1: Advice to the Applicant

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the application, please reconsult us.

#### Decision notice

In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

### KCC Heritage

Thank you for your letter consulting us on the above planning application. In this instance I suggest that no archaeological measures are required.

### KCC Highways

Thank you for your consultation in relation to the above planning application. I have the following comments to make with respect to highway matters:

The proposal is for six units within the building, consisting of one Class E workshop (re-located within the existing building), and five light industrial, all of which are intended to accommodate light industrial and storage uses and therefore fall within use class E(g)(iii) and Use Class B8.

#### Access:

An Automatic Traffic Count (ATC) survey was undertaken on Queens Farm Road between 7 and 13 May

2025 and recorded 85th percentile vehicle speeds of approximately 32.5mph southbound and 32.7mph northbound on Queens Farm Road. These values are substantially below the national speed limit.

The applicant has subsequently derived visibility requirements using the recorded vehicle speeds in accordance with Manual for Streets guidance. The submitted drawing (drawing number 25173-MA-XX-XX-DR-C-0100, revision P01) demonstrate that visibility splays of 2.4m x 48.5m to the north and 2.4m x 48.1m to the south can be achieved from the existing site access within land under the applicant's control. These splays are considered appropriate for the observed operating speeds on Queens Farm Road and provide adequate intervisibility between emerging and approaching vehicles.

Vehicle tracking has been demonstrated as shown on drawing number 26111-MA-XX-XX-DR-C-7000 P01 showing that a 10 metre rigid vehicle can enter and egress the site in a forward gear.

It should be noted that there are some concerns regarding the routeing of larger vehicles to and from the site. In particular, it is possible that a proportion of trips could approach from the north via the A226 and Green Farm Lane, which is subject to HGV restrictions. Furthermore, Queens Farm Road is very narrow in places and may present difficulties for larger vehicles.

However, the applicant has confirmed that the site is already regularly accessed by larger vehicles, including agricultural vehicles, as part of the existing farming business. While there is potential for some additional larger vehicle movements associated with the proposed development, it is not considered that the scale of impact would be sufficient to warrant an objection. Therefore, on balance, the residual highway impact is considered acceptable.

#### Vehicle Parking:

The applicant has stated that two parking spaces are proposed to be allocated for each unit, totalling 14 designated parking spaces.

The proposed conversion of the northern end of Building 2 from agricultural use to a workshop space E(g) (iii) would normally require one space per 35sqm, which would equate to an overall requirement for 7 spaces based on the 255sqm workshop associated with the joinery business. Only two spaces have been provided for the agricultural workshop.

The proposed parking provision for Building 1 is difficult to fully assess, as the intended use of Units 2-6 remains unclear. Unit 1 comprises a 200 sqm workshop for the existing agricultural tenant, whilst Units 2-6 provide approximately 1,012 sqm of flexible commercial floorspace that could operate as either Class E(g) (iii) light industrial or Class B8 storage accommodation. If Units 2-6 are assessed as B8 storage uses, the Kent County Council Parking Standards would generate a requirement for approximately 9-10 parking spaces, which broadly reflects the number of spaces shown on the submitted layout. However, if the units were occupied predominantly for E(g)(iii) light industrial purposes, a higher parking requirement of approximately 29 parking spaces would be required. In addition to vehicle parking, the Kent Design Guide Parking Standards require provision for goods vehicles associated with B8 storage and distribution uses at a rate of 1 space per 300m<sup>2</sup> GFA, equating to a total requirement of around four spaces. Notwithstanding this, it appears that additional informal parking could be accommodated within the wider yard area should further demand require it.

It should be noted that parking spaces 3 and 4 obstruct the access route to the western part of the site, whilst spaces 13 and 14 also partially encroach into the access corridor. The applicant should relocate these parking spaces to ensure they do not impede vehicular manoeuvring or pedestrian access within the site.

#### Trip Generation:

##### Existing Vehicle Movements:

It is understood that vehicle movements associated with the existing grain store (Building 3) will remain unchanged as part of the proposals. The grain store generates intensive seasonal activity during the harvest period, with approximately 25 tractor and trailer round trips per day, together with grain outloading

between October and April, typically resulting in up to three HGV movements per day. As these operations will continue unchanged, they do not form part of the development-generated traffic assessment.

In contrast, the existing agricultural activities undertaken within Building 1, comprising livestock housing, log splitting, storage and distribution, will cease entirely. These activities currently generate approximately 2 to 3 vehicle movements per day on average and will therefore be removed from the baseline traffic profile.

**Additional Vehicle Movements:**

To assess the likely traffic impact of the development, three separate TRICS-based trip generation scenarios have been undertaken.

The first assessment was based on TRICS Land Use 02: Employment, Category C (Industrial Unit), representing a light industrial use. This scenario forecasts the development would generate 6 two-way vehicle trips during the AM peak hour, 7 two-way vehicle trips during the PM peak hour, and 48 two-way vehicle trips across a typical weekday. Whilst only two comparable sites were identified within the selected dataset, the resultant trip rates are considered reasonable and provide a robust worst-case assessment of traffic generation.

A second assessment was undertaken using TRICS Land Use 02: Employment, Category F (Warehousing/Commercial). However, it is considered that this dataset is less representative of the proposed development, as many of the selected sites comprise larger-scale warehousing and logistics operations located within established industrial estates and operating at a significantly greater intensity than that anticipated at Queens Farm.

A third assessment was undertaken using TRICS Land Use 16: Farm Diversification, drawing on 5 comparable rural employment and diversification sites. This scenario forecasts 4 two-way vehicle trips during the AM peak hour, 2 two-way vehicle trips during the PM peak hour and 37 two-way vehicle trips over the course of a typical weekday. Given the rural location of the site, the nature of the proposals and the continued agricultural context of the wider farm holding, this scenario is considered to provide the most representative estimate of likely traffic generation.

**Summary:**

Overall, the proposed development is forecast to generate a relatively low level of vehicular activity under all assessed scenarios. Even when assessed against the robust worst-case Industrial Unit scenario, the development would generate only 6 two-way trips in the AM peak, 7 two-way trips in the PM peak and 48 two-way trips across the day. As such, the proposals are not considered to result in a material increase in traffic or to have a significant impact on the operation of the local highway network.

**Conclusion:**

As stated earlier, KCC Highways' main concern relates to the routeing of larger vehicles, particularly given the HGV restriction on Green Farm Lane and the constrained width of Queens Farm Road. However, as the site already accommodates regular agricultural vehicle movements and the anticipated increase in larger vehicles is limited, the impact is not considered sufficient to warrant an objection.

- Provision and maintenance of the visibility splays shown on the submitted plans (drawing number 25173-MA-XX-XX-DR-C-0100, revision P01) with no obstructions over 1.05 metres above carriageway level within the splays prior to the use of the site commencing.
- Provision and permanent retention of the vehicle parking spaces shown on the submitted plans (drawing number 9446-A-L-(03)-0001, revision P02) prior to the use of the site commencing.
- Use of a bound surface for a minimum of the first ten metres of the access from the edge of the highway.
- Provision of measures to prevent the discharge of surface water onto the highway.
- Any entrance gates must open away from the highway and must be set back a minimum of ten metres from the edge of the highway.

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway.

Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website: <https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

#### KCC Minerals and Waste

I have no land-won minerals or waste management capacity safeguarding objections or comments to make regarding this planning application.

### Kent Police

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme;

1. We recommend the applicant review current boundary treatments. We advise these to be a minimum of 2m in height.
2. We recommend natural surveillance for parking areas. As a secondary layer of security, we would also recommend CCTV be installed to further monitor use. We also recommend gating access roads/ parking areas when the facility is closed to prevent nuisance parking and misuse out of hours.
3. Defined pedestrian routes to/ from the building are recommended to improve safety and avoid pedestrian and vehicle conflict.
4. Lighting - Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g., a Member of the ILP), particularly where a lighting condition is imposed, to help avoid conflict and light pollution. we recommend that a suitable lighting policy is installed to ensure that the units and staff have safe access to and from the units and to help deflect criminality. External lighting to conform to min standard of BS5489-1:2020.
5. CCTV is advised for all areas, especially at entry points including any emergency exits, any till areas, areas with limited natural surveillance such as rear of the units, storage areas containing high-value equipment, bin storage areas and on the access/ exit road. We also recommend cameras in the following areas to keep users safe and monitor their movements; loading/ unloading areas, car parking areas, reception areas/main office/ safe location. The CCTV must not infringe any lighting plan.
6. We strongly recommend alarms, with an auto-dial function, be installed on all external doors, including emergency exits.
7. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation, and locks) including folding or sliding to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+.
8. Windows on the ground floor to meet PAS 24: 2022 UKAS certified standard, STS 204, LPS 1175 Issue 8:2018 Security Rating 1/A1, STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1 Security Rating A. Glazing to be laminated. Toughened glass alone is not suitable for security purposes.
9. Any Shutters should be as close to the building line as possible and must avoid the creation of a recess. Shutters must be certificated to LPS 1175: Issue 7, SR2; STS 202: Issue 3, BR2; Sold Secure Gold or PAS 68:2013.
10. Bin Stores associated with this proposal must be secure, lit and, if in an area with limited natural surveillance we recommend CCTV cameras be installed. We also strongly advise against placing this store close enough to the building that it can be used as a climbing aid into the building when closed.
11. If any buildings are to have roof access for maintenance of solar panels etc., we recommend that ladders/ access doors to these areas are securely locked so that members of the public are unable to access this area. We also require CCTV to cover this area in order to monitor unauthorized access.
12. Pre-existing and new trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees with a crown of above 2m rather than low crowned species are more suitable than "round shaped" trees with a low crown. New trees should not be planted within parking areas or too close to street lighting. Any hedges should be no higher than 1m, so that

they do not obscure vulnerable areas.

13. Access control. Adequate access control is required for entrances used by staff only such as storage rooms and other restricted areas. Any public access to commercial units should be restricted.

To note, as Designing Out Crime Officers we use Secured By Design Guidance in our recommendations. Whilst our comments may be standardised within this letter, we encourage the applicant to contact us to discuss the plans in further detail.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

#### North Kent Marshes Water Level Management Board

Thank you for your consultation on the above-referenced planning application.

The site lies within the drainage district of the newly formed North Kent Marshes Water Level Management Board (NKMWLMB).

The Board has reviewed the submitted information and, having regard to the nature and scale of the proposal, considers that it is unlikely to have a significant impact on the Board's interests. Accordingly, the Board has no specific comments to make.

However, the Local Planning Authority may wish to seek clarification regarding the proposed surface water drainage arrangements, in particular the means of managing any overflow from the proposed water butts.

This response is based on the information submitted in support of the planning application and is subject to the accuracy and completeness of that information.

#### Shorne Parish Council

The Parish Council has to **OBJECT** to this application due to significant concerns.

The site is within and adjacent to, and requires access through, a rural Conservation Area in the Green Belt, and will generate considerable additional HGV, van and other traffic on an unsuitable rural road (and other local roads) where problems are already being experienced. We question the appropriateness in general of creating a mini industrial/commercial estate in such an unsuitable Green Belt location, which is close to the Ramsar site.

A pre-application discussion with a GBC Officer is reported to have taken place.

##### 1) Redundancy versus future need

The barn complex was permitted in connection with existing and on-going agricultural use, for which the historic existing barns and farmyard were deemed no longer suitable. The historic farmyard was then converted to residential use.

The location of the new barns west of Queens Farm Road was accepted as being a very special circumstance, and the subsequent use of one area for woodworking was accepted as being an appropriate use in an agricultural area.

It is concerning that it is now being stated that much of the new barn complex is redundant if that might lead in future to a new application for a barn/barns elsewhere on the landholding. Therefore all permitted development rights should be withdrawn.

##### 2) Red line boundary

Land to the north of the barns is not part of the red line boundary but the proposed units have rear doors. Use of these doors and the land at the rear should be clarified, and prevented/controlled by Condition. Further landscaping (existing should be retained) would be appropriate.

#### Suitability for conversion

The main barn does not appear to presently have any floor or general foundations.

#### Parking

14 spaces are shown, it is unclear if that also allows for defined additional visitor parking.

Depending on the use to which the units are put, including internal expansion by means of mezzanine floors, it is a concern that parking need could greatly exceed the on-site provisions. Any roadside parking would compromise traffic movements and the visibility splays.

The spaces numbered 3 and 4 block the existing access to the west, to the rest of the land.

#### Landscaping and biodiversity enhancement

A landscaping scheme has not been provided, this should be submitted before permission is given. Installation of one bird box and one bat box seems a rather minimalistic approach to environmental enhancement given the location of the site.

#### Exterior Lighting

This is an area that is presently dark, and which is close to the Ramsar site.

A lighting plan is needed, with strict controls on external and security lighting, this should be submitted before permission is given.

#### Foul drainage and other refuse

6 new toilets are shown. The Planning Statement states that "The existing development is not connected to mains drainage and a new Klargest treatment plant is proposed to serve the proposed development."

Details of this and its proposed location could not be found in the submitted documents, and it is not clear whether such installations are suitable for drainage from commercial/industrial uses.

3 water butts are shown at the rear of the main barn units, the access arrangements and usage of these requires clarification.

A Location for refuse bins (in-use and awaiting collection) is needed.

#### Road access and Traffic issues

The barns are in a non-sustainable location without any nearby public transport or local facilities, and where access largely relies on motor vehicles.

Queens Farm Road is a narrow, single track roadway with only informal passing places. It was not intended for the level of traffic it already receives let alone the increases that are proposed. There are already conflicts between vehicles and pedestrians accessing the marshes.

At some points, such as where Greendales immediately abuts the roadway, Queens Farm Road is particularly narrow and noise and vibration generation are particularly concerning.

Conditions should be attached regarding access routes. This should be only via Lower Higham Road (to Chalk or Higham) as Green Farm Lane is single track in parts, is unsuitable for increased traffic and has a 7.5Ton weight limit. Similarly, the whole of Shorne is protected by a less than 6'6" width restriction.

Unfortunately, a significant number of reports of HGV's associated with the barns (Unit 2) infringing the Green Farm Lane TRO restrictions have already been reported through the Lorrywatch scheme.

We would also like to know what the management arrangements are going to be, meaning who should be contacted about problems arising from any further conversion.

#### Use classes

Use Classes E(g)(iii) and B8 are proposed, including a Class E workshop, described as "Light industrial, storage, and small business use".

There is significant concern about possible use for storage and distribution as this class already causes problems of various kinds at the nearby Apex site.

Outside storage should not be permitted on the actual site and also not on adjacent/nearby land.

#### Other matters:

- Aerial views show a considerable amount of open storage taking place outside of the woodworking business and this should be regularised or removed.
- The Site location plan shows that the applicant also owns land east of Queens Farm Road. On the aerial views a large area of hardstanding was created (and is known to have been used for Lower Thames Crossing works) without any planning permission, and we look forward to this being removed.
- The site will also need EV charging points, and bicycle storage.

- Hours of operation – in view of the proximity to residential dwellings, operating hours should be restricted by Condition
- We note that the Site is not included in the draft Development Plan 2042 (Submission Version) for Gravesham (Regulation 19) that was recently under consultation.

#### Internal Consultees

#### GBC Environmental Protection

The methodology and findings of the submitted noise and vibration assessment by MRL are acceptable. The following conditions are advised.

#### **Noise Control**

- The rating noise from fixed building services/mechanical plant/equipment associated with the development shall be at least 10dB below the existing LA90 background level at the nearest noise sensitive receptors (i.e. dwellings) when measured and assessed in accordance with BS4142:2014. Background noise levels from the 'Noise and Vibrational Impact Assessment' dated May 20026 by MRL Acoustics (Report Ref: MRL/100/2276.1v1) can be used in any assessment.
- No equipment associated with the operation of any of the commercial units shall be used outside of the units and doors and windows shall remain closed at all times.
- Use shall be restricted to 0800 to 1800 Monday to Friday.
- The proposed buildings shall be constructed in accordance with the sound insulation details given in section 5 of the above noise report.

#### **Lighting**

Artificial lighting can cause a statutory nuisance under the Environmental Protection Act 1990. It is important that the applicants are not permitted to install external lighting that illuminate anything other than the ground within the curtilage of the new properties in order to assist in preventing a nuisance from occurring (which would be most likely if the bedrooms on neighbouring properties are illuminated).

#### Neighbouring properties

The application has been advertised by individual neighbour letters to 2 properties, on site and in the press. The overall consultation period expired on 28 August 2026.

Six letters of representation have been received, with the following comments:

- Queens Farm Road is an inappropriate location for industrial/commercial activities, particularly in addition to another business park in the area on Green Farm Lane.
- Cumulative harm from Apex Business Park should count against this scheme.
- Increased traffic including vans and HGVs on unsuitable, narrow country roads will adversely impact pedestrian and highway safety.
- An increase in traffic (particularly large vehicles up to and in excess of 7.5 tonnes) will have an adverse impact on the quality of life and the enjoyment of the homes of residents in Green Farm Lane, as well as on Queens Farm Road and Lower Road, including through increased noise pollution and air pollution from vehicles.
- The introduction of additional, less predictable commercial and industrial traffic will materially worsen noise, vibration and disturbance to neighbouring residential properties.
- Increase in commercial vehicle movements will lead to more delays in journeys.
- As there are undefined uses and users there is an unknown impact and activities cannot be properly assessed.
- The roads are increasingly being damaged by overuse, as well as damaging properties.
- Emergency vehicles would not be able to pass.
- The vehicle movements are having an adverse impact on other users, including walkers, cyclists, horse riders.



- Shorne Parish Council's Lorry Watch scheme receives a significant number of reports from residents concerning overweight vehicles illegally using Green Farm Lane, accessing premises in Queens Farm Road. Those reported are just a fraction of the actual number of overweight vehicles which disregard the 7.5 tonne weight restriction in Green Farm Lane. A Lorry Watch Notice is sent to each and every offending vehicle operator identified.
- Existing agricultural traffic is not a fair comparator to proposed unpredictable, frequent commercial movements.
- Traffic Regulation Orders or approved routes and vehicle movements conditions are ineffective and cannot be monitored or enforced.
- The application would result in the loss of livestock accommodation on this long-established agricultural land. The accommodation is currently used to house cattle.
- The site is opposite the historic Queens Farmhouse within the Conservation Area. Light spill and vibrations will have an adverse impact this historic setting.

KCC Biodiversity, the Health and Safety Executive and Local Ward Councillors were also consulted but no responses were received.

## Officer's Analysis

### Proposal

The application seeks permission for the change of use of the existing livestock building (Building 1) to create 5 light industrial (Use Class E(g)(iii)) / storage (Use Class B8) units with x1 agricultural unit and installation of roof-mounted solar panels, along with the conversion of an existing agricultural unit (Building 2) in a building to the west of the site to a workshop (Use Class E).

### *Existing Site Configuration:*



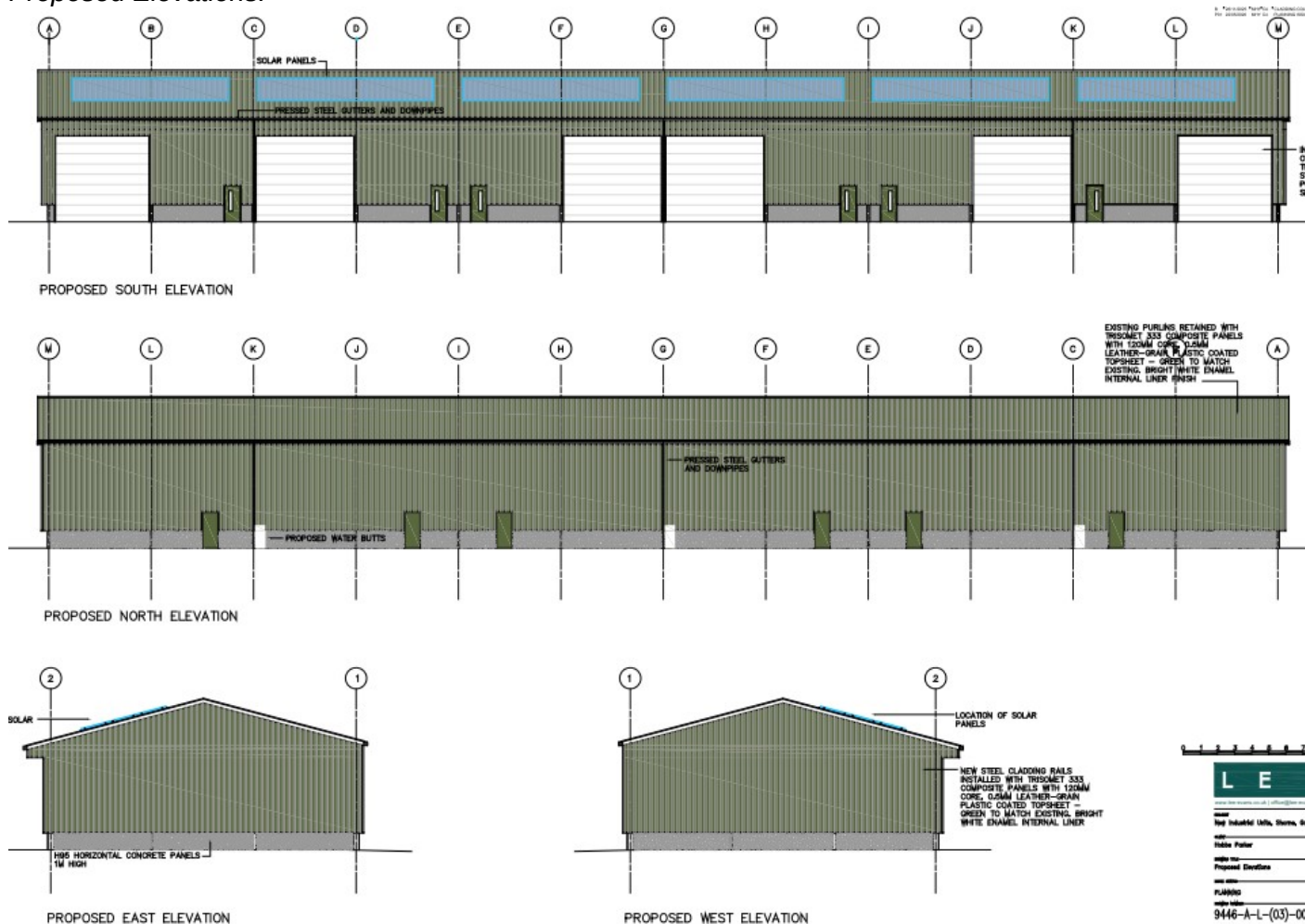
Building 1 would be converted into 6 individual bays (5 light industrial/storage and 1 farm workshop), all around 200sqm. The submitted plans also include the provision for a future mezzanine floor (100sqm). The southern elevation of the building would be enclosed (it is currently open), roller shutters would be installed to each unit and the existing cladding, roof materials and rainwater goods would be replaced. The roof and walls would consist of insulated composite panels with a green finish above horizontal precast concrete panels. Gutters and downpipes would be finished in black. There would be no extension to the existing building. Solar panels would be installed on the south-facing roof slope.

The northern bay of Building 2 is currently used for agricultural storage; this will be relocated to the Building 1 farm workshop bay and the Building 2 bay will then be converted to additional Class E workshop





## Proposed Elevations:



There are rear access doors shown on the above elevation of Building 1 that open onto land outside of the red application site boundary. There is nothing in planning terms to prevent the inclusion of access doors in the building at the rear but there are no proposals within this application for development on the land beyond the application site.

## Site Description

The site lies to the west of Queens Farm Road, in an Area of Archaeological Potential, in the Queens Farm Conservation Area, Green Belt and Higham Arable Farmlands Landscape Character Area. There are three detached buildings on the site, one of which has been partly converted to B1 use already and is occupied by Craftworks Joinery. There is open countryside around the site to the north, south and west, and a small collection of residential properties opposite to the east.

## Main Issues

Policy E4 of the NPPF 2026 relates to rural business development and supports the sustainable growth of business in rural areas. The development and diversification of agricultural and other land-based businesses should be enabled, and it should be recognised that proposals to meet local business needs may be required in such areas, in locations that are not well served by public transport. It will be important, however, to ensure that development is well-related to existing development and appropriate in relation to the character of its surroundings.

Policy CS07 of the Core Strategy 2014 relates to employment and seeks to deliver new employment floor space. It gives support for schemes incorporating small and flexible industrial and/or office workspaces to support the start-up and expansion of small and medium enterprises. Policy CS07 of the Core Strategy

2014 also supports proposals that promote the appropriate expansion and diversification of the rural area economy. Policy CS02 supports development outside rural settlements, including proposals to diversify and maintain the rural economy, where it is compatible with national policies for protecting the Green Belt and policies in this plan.

This proposal site is located in the countryside, outside any rural settlement, in the Green Belt and Higham Arable Farmlands Landscape Character Area. The application site relates to the business of Queens Farm which is currently let to local farmers upon Farm Business Tenancy Agreements.

The application site contains existing farm buildings that were erected around 2002 by the previous owner to facilitate the re-development of the traditional farm buildings to the east of the site to a residential use. The existing buildings on the application site were originally used for overwintering cattle. Subsequent to this, as the farm became more arable, the farm buildings became more redundant. Prior approval was granted in 2019 to change the use of part of one of the buildings on the site from agriculture to B1. This does set a precedent for this type of development at this site.

National and local policy is generally supportive of rural business development and expansion, subject to compatibility with policies for protecting the Green Belt and other policies in the development plan.

On this basis, the main issues for consideration in the determination of this application are as follows:

- Principle of development in the Green Belt
- Impact on landscape character
- Design and impact on character and appearance of Queens Road Conservation Area
- Residential amenity
- Highways and parking

### Green Belt

Policy CS02 of the Core Strategy 2014 prioritises development in the urban area as a sustainable location for development. In the rural area it states that development will be supported within rural settlements that are inset from the Green Belt and defined on the Policies Map. Development outside those settlements (which is the case here), will only be supported where it is compatible with national policies for protecting the Green Belt and policies in the Core Strategy 2014.

Green Belts are of great importance. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open (Section 13 of the NPPF 2026). Policy GB6 of the NPPF 2026 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations

In making this assessment, substantial weight should be given to the harm to the Green Belt. Development in the Green Belt is inappropriate unless either one of the exceptions in Policy GB7 applies. The excepted categories of development are not inappropriate in the Green Belt, and are therefore not regarded as harmful to the Green Belt or be required to demonstrate very special circumstances. In this case, the following GB7 exception applies:

*1.b. The reuse, extension, alteration or replacement of an existing building, provided that the existing building is of permanent and substantial construction, is lawful in planning terms, and any extension or alteration will not result in a disproportionate increase in size compared to the original building<sup>40</sup>. In the case of proposals for a replacement building, it should be for the same use and not materially larger than the one it replaces;*

In addition, saved Policy C11 of the Local Plan 1994 relates to the change of use of redundant buildings in the countryside and sets out the following:

*Conversion of farm buildings to other uses will be permitted where:-*

- (i) It can be demonstrated that the building was originally erected as an agricultural building but is no longer needed for farming.*
- (ii) The building is a substantial one, of permanent construction and is in an appropriate location in relation to roads and services.*
- (iii) The building is attractive, in having some architectural, historic or landscape interest or being of a type representative of the Kent Countryside and the proposed alterations preserve that interest.*
- (iv) The proposed use will diversify the rural economy and not result in the longer term dilution of farm viability\*.*
- (v) The curtilage is confined to the minimum necessary to operate the use.*
- (vi) The nature and intensity of the proposed use is not detrimental to amenity or traffic safety.*

*\* This will often rule out residential conversion.*

The preamble to the policy states that the Council will be particularly concerned to ensure that any change of use does not reduce farm viability and that the impact on the landscape from such changes is minimised. Landscape, amenity and transport considerations will be assessed in the relevant sections below.

The Planning Statement includes information about the existing buildings on the site:

- 3.2 *Building 1 is situated to the north of the site and is currently used for agricultural purposes, including cattle and sheep housing, log splitting and distribution, by a short-term tenant. This is a modern agricultural building with a solid steel portal frame and a fully intact roof. Photographs of the frame of the building are shown below:*



*Building 2 is west of the yard and is currently partly occupied by Craftworks Joinery workshop under*



*Use Class E and partly used for agricultural storage and machinery. A photograph of the building is shown below. Again, this is a modern agricultural building, of solid construction.*



The application buildings are of permanent and substantial construction suitable for conversion, are lawful and there will be no extensions to them, as required by Policy GB7 of the NPPF. In these terms, the proposal would fall under an excepted category of development and would therefore not be inappropriate development in the Green Belt.

In order to comply with the requirements of saved Policy C11 of the Local Plan, information that the building is no longer required for a farming use has also been put forward in the form of an Agricultural Justification Report, which includes the following points:

*7.3. The farm is currently let to local farmers upon Farm Business Tenancy Agreements and the majority of the farmland is in arable production with areas of orchard, permanent pasture and grazing marsh being secondary to the main farming operation.*

*7.4. The existing farm building were erected in circa 2002 by the previous owner to facilitate the re-development of the traditional farm buildings to a residential use, and were designed in conjunction with the previous long-standing tenant farmer to support their mixed farming enterprise of arable, sheep and beef production. At that time the buildings supported a land holding in excess of 1,200 acres.*

*7.5. Building 1 was designed to over winter significant heads of cattle and the tenant. In September 2018 the long-standing tenant retired, and the farm was re-let in two parts. Lot 2 comprised 86 acres of pasture to include 33 acres of grazing marsh and the livestock building which was let to a separate tenant. Since 2024 the livestock building has become largely redundant due to the reduction of grazing land at Queens Farm. It has been let on a licence agreement to a local farmer who has used it for occasional storage of farm machinery and bales. The building has not been used to its full capacity on the basis that the land does not support a sufficient number of livestock to fully occupy the building over the winter months.*

*7.6. The agricultural industry has changed significantly in recent years – livestock margins and profits have been impacted due to a number of factors, including falling farm subsidy and rising costs, resulting in a downturn in demand. Many cattle businesses in the UK are also affected by Tuberculosis which has further impacted the sector and returns.*

*7.7. The farm is now predominantly arable and would retain the grain store (Building 3) to support the farming enterprise. There is no requirement for a large livestock building. The need for the change of use from agricultural to commercial storage and light industrial is based on the assessment of the business needs to diversify and adapt with the changing environment whilst making use of the existing assets to generate income for the business.*

*7.8. The proposed development is unlikely to have an adverse effect on the viability of the farming unit, in fact it would help sustain any agricultural activity on site and help the business survive in the future*

The report explains that the livestock building is no longer required in the manner for which it was originally constructed. There would also remain a building on the site for the agricultural use as it stands (Building 3). With such evidence, as the proposal would involve the conversion without extension of the existing permanent, substantial and lawful agricultural buildings on the site, it would be considered to meet the

Policy GB7 exception and would be considered 'not inappropriate' development in the Green Belt, as well as complying with the relevant requirements of saved Policy C11 of the Local Plan 1994.

### Landscape Character

Policy DP3 of the NPPF 2026 seeks to ensure that development will add to the quality of an area, be visually attractive, and sympathetic to local character and history. Policy CS19 of the Core Strategy 2014 reflects these aims and requires that new development is well-designed and respects the character and appearance of the surrounding area.

Policy N2 of the NPPF 2026 aims for development to contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside.

The application site is located in the Higham Arable Farmlands Landscape Character Area and as such, Policy CS12 of the Core Strategy 2014 is also relevant. This policy states that the overall landscape character of the Borough will be conserved, restored and enhanced and that the Gravesham Landscape Character Assessment (LCA) will be taken into account in determining applications. The LCA states the area is defined by gently undulating topography with open arable farmland, hamlets and settlements, isolated farmsteads and scattered properties with locally distinct styles and materials that contribute to the rural character of the area. The condition of the landscape is generally poor and its sensitivity moderate. The guidelines for the area focus on restoring landscape elements in poor condition, whilst safeguarding prominent landscape features within the wider landscape.

As the proposal would involve the conversion of the existing buildings and would not involve any further development outside this built form, there would be no impact on the wider Higham Arable Farmlands Landscape Character Area, and the proposal would therefore conserve landscape character and comply with landscape policy requirements.

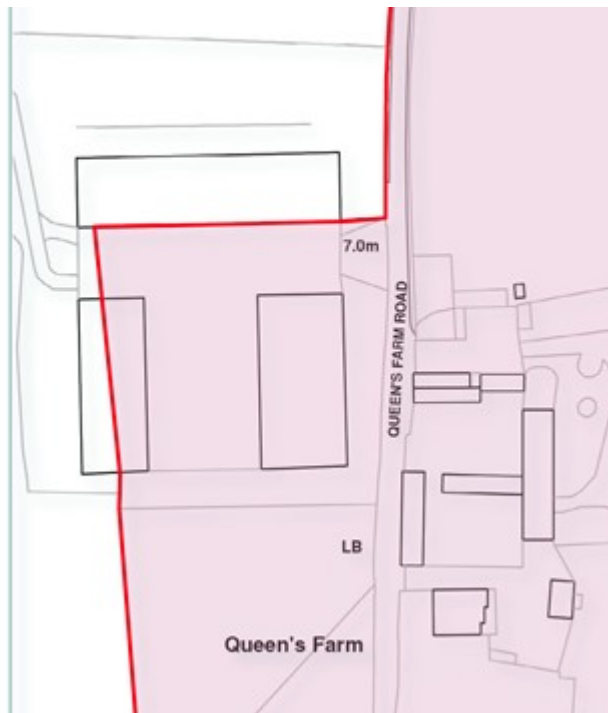
There are no proposals for additional landscaping on the site, and there are no proposals to alter what is existing around the site. Given the change of use would not alter the functional character of the existing yard, the existing landscaping is considered appropriate in this instance.

### Design and Impact on Conservation Area

Section 14 of the NPPF 2026 relates to promoting high quality places and sets out the Government's requirements in relation to design issues. Policy DP3 sets out the key principles for well-designed places, including that development proposals should respond to their context, so they integrate with and enhance their surroundings. Policy CS19 of the Core Strategy 2014 reflects these aims and requires that new development is well-designed and respects the character and appearance of the surrounding area.

Section 20 of the NPPF 2026 aims to conserve and enhance the historic environment. Policy HE6 sets out that substantial weight should be given to the conservation of a designated heritage asset. This is echoed in Policy CS20 of the Core Strategy 2014, which states that the significance of the Borough's heritage assets and their setting should always be preserved and enhanced. Saved Policy TC3 of the Local Plan 1994 also states that development is expected to make a positive contribution to the conservation area.

The site is located partly within the Queens Farm Conservation Area boundary (shown in pink below):



In this regard, the main consideration for this proposal would be the proposed changes to the elevations of the buildings and whether they would be acceptable in terms of the impact on the character and appearance of the Conservation Area. The buildings make a neutral contribution to the significance of the Conservation Area, which, as set out in the Queens Farm Rural Conservation Area Appraisal Supplementary Planning Document (2016) is largely characterised as follows:

*"...an historic farmstead and workers cottages all within their historic rural setting... The local special interest of the area lies in the relative completeness of the building group of farmhouse, farm buildings and yards and workers houses. These arrangements exemplify the last stages of small scale traditional agricultural operations, before they were overtaken by modern practice as embodied in the three huge sheds recently erected partly within the conservation area."*

The proposed cladding and roof materials for the converted buildings would be in keeping with the utilitarian and rural appearance of the existing modern farm buildings, including the unit that has already undergone a change of use, and would not have an adverse impact on the character and appearance of the special interest of the Conservation Area, which would continue to be preserved.

There would be solar panels on the roof of Building 1. As the building is large and the roof profile is low, and the orientation of the panels would face into the site, the panels will not be readily visible from a public vantage point. It must also be considered that they are a conventional installation for a roof. The solar panels would not result in any significant adverse impact on the key interests of the character and appearance of the area that would outweigh the greater policy support for such development.

In terms of design and impact on the Conservation Area, the proposed building alterations and treatment would be appropriate for the rural location and would comply with conservation policy requirements.

### Residential Amenity

Section 12 of the NPPF 2026 seeks to promote the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions, Section 14 seeks to promote high quality, healthy, inclusive and sustainable places, and Section 17 focuses on the new development being appropriate for its location, taking into account the risks and impacts of pollution and other hazards. Policy P3 sets out that development proposals should provide healthy living conditions for occupiers and users in terms of adequate access to light and avoiding exposure

to levels of air, noise, artificial light or other sources of pollution which could have an unacceptable adverse effect on health and the quality of life.

The impact on amenity is also considered with regard to the criteria within Policy CS19 of the Core Strategy 2014, which states that new development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land, and avoid adverse environmental impacts from pollution.

The closest residential properties to the application site are opposite the site entrance, on the eastern side of Queens Farm Road. It is recognised that there is an existing joinery workshop that operates within one of the buildings on the site and that the existing agricultural use will also generate a certain level of activity, noise and disturbance.

The Council's Environmental Protection team has commented on the proposal, including the submitted Noise and Vibration Impact Assessment. They found the methodology and findings of this assessment to be acceptable and have recommended conditions restricting noise levels and outside equipment as well as hours of operation, and ensuring the buildings are constructed in accordance with the submitted sound insulation details.

With regard to lighting, there is none proposed, but a condition should be imposed to prevent any illumination other than the ground immediately to the front of the buildings to assist in preventing a nuisance from occurring. Any lighting should be designed to address conservation matters, and incorporate the latest practical guidance on considering the impact upon bats.

On this basis, the proposal is considered to safeguard the amenity of residential properties in compliance with Policy CS19 of the Core Strategy 2014 and relevant NPPF 2026 policies.

### Highways and Parking

The majority of neighbour representations about the proposal relate to transport concerns. As experts on this matter, KCC Highways have been consulted on the submitted Transport Statement and relevant application submissions. Their comments are set out fully above and summarised below.

There are some concerns regarding the routeing of larger vehicles to and from the site. In particular, it is possible that a proportion of trips could approach from the north via the A226 and Green Farm Lane, which is subject to HGV restrictions. Furthermore, Queens Farm Road is very narrow in places and may present difficulties for larger vehicles.

However, the site is already regularly accessed by larger vehicles, including agricultural vehicles, as part of the existing farming business. While there is potential for some additional larger vehicle movements associated with the proposed development, it is not considered that the scale of impact would be sufficient to warrant an objection. Therefore, on balance, the residual highway impact is considered acceptable.

The applicant has stated that two parking spaces are proposed to be allocated for each unit, totalling 14 designated parking spaces. Whilst there may be different parking requirements depending on the end use of the units, additional informal parking could be accommodated within the wider yard area should further demand require it. Revised plans have been submitted to address the parking comments raised in relation to certain proposed parking spaces impeding vehicular manoeuvring or pedestrian access within the site.

In terms of trip generation, Building 3 and its associated movements did not form part of the traffic assessment as this use will continue unchanged.

Overall, the proposed development is forecast to generate a relatively low level of vehicular activity under all assessed scenarios. As such, the proposals are not considered to result in a material increase

in traffic or to have a significant impact on the operation of the local highway network.

To conclude, KCC Highways' main concern relates to the routeing of larger vehicles, particularly given the HGV restriction on Green Farm Lane and the constrained width of Queens Farm Road. However, they consider that as the site already accommodates regular agricultural vehicle movements and the anticipated increase in larger vehicles is limited, the impact is not considered sufficient to warrant an objection.

KCC Highways have recommended conditions relating to the provision of visibility splays, retention of vehicle parking spaces, surfacing the access, preventing discharge of surface water, and restricting entrance gates.

On this basis, there would therefore be no adverse parking or highway issues resulting from the proposal, which would comply with Saved Policies T1 of the Local Plan First Review (1994) and Policies CS11 and CS19 of the Core Strategy 2014.

### Any Other Material Planning Considerations

#### *Archaeology*

The NPPF 2026 aims to conserve and enhance the historic environment (Section 20). This is echoed in Policy CS20 of the Core Strategy 2014, which states that the significance of the Borough's heritage assets and their setting should always be preserved or enhanced. Saved Policy TC7 of the Local Plan 1994 states that development on important archaeological sites will not normally be permitted.

The site is within an Area of Archaeological Potential. KCC Archaeology have confirmed no archaeological measures are required. On this basis, there would be no conflict with the aforementioned policy requirements.

#### *Biodiversity*

Policy N2 of the NPPF 2026 states that to contribute positively to the natural environment, and support nature's recovery, development proposals should consider the environmental qualities of land proposed for development, including habitats, landscape character and the natural beauty of the countryside, and identify opportunities for those qualities to be conserved or enhanced. Policy CS12 of the Core Strategy 2014 reflects this stance and states that there will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought.

As this proposal would involve converting existing buildings and would not impact a priority habitat or impact less than 25 square metres (5m by 5m) of on-site habitat and 5 metres of on-site linear habitats such as hedgerows, it would be exempt from Biodiversity Net Gain (BNG) requirements.

In relation to ecology, a Preliminary Roost Assessment (Bats) and Nesting Bird Assessment has been carried out. In terms of birds, the report considers that the small nature of the site, lack of suitable habitats and heavy levels of disturbance means that the site has negligible potential for notable wintering bird species and assemblages. Regarding bats, the survey determined that Building 1 and 2 hold negligible suitability for roosting bats during the active and hibernation seasons and therefore no further action for roosting bats is required. The report details avoidance and mitigation measures for the development to follow, as well as ecological enhancement measures.

Comments have not been received by KCC Biodiversity but it is considered appropriate to condition the use of sensitive lighting if any is proposed to be installed and to ensure that the works are carried out in accordance with the recommendations in the submitted assessment.

#### *Flooding and Drainage*

Section 18 of the NPPF 2026 sets out policies relating to minimising risks to development arising from all sources of flooding and coastal change.

A Flood Risk Assessment has been submitted. According to the Flood Map for Planning, the site lies outside Flood Zones 2 and 3.

The site is within the jurisdiction of the North Kent Marshes Internal Drainage Board (IDB) but they had no comments as the proposal would not affect their interests.

The Environment Agency was also consulted. They have no objection to the development as the development is within Flood Zone 1 and outside of the modelled flood extents. They have provided advice for the applicant relating to flood mitigation, flood risk issues and connection to mains foul drainage.

There are therefore no policy conflicts in relation to flooding and drainage.

### *Energy*

There is strong national policy support to support the development and operation of energy and water infrastructure in ways which align with wider development, clean power and net zero objectives (Section 10 of the NPPF 2026). Policy W3 of the NPPF 2026 states that when determining planning applications for renewable and low-carbon energy development and electricity network infrastructure, substantial weight should be given to:

- a. The benefits for improving energy security, supporting economic development and/or the transition to a net zero future;*
- b. In the case of applications for the re-powering and life-extension of existing sites, the additional benefit of utilising an established site for this purpose; and*
- c. The contribution that small-scale and community-led renewable and low carbon energy projects can make to reducing greenhouse gas emissions, along with their associated economic and social benefits.*

Policy CS18 of the Core Strategy 2014 also seeks to reduce the overall carbon footprint of the Borough and supports stand-alone renewable energy development where it is compatible with national and local planning policies.

KCC produced a Solar Policy Position Statement in 2014 in relation to large-scale solar arrays. In summary, it is supportive in principle of the installation of renewable and low carbon energy generation technologies. The Statement specifically sets out a support for solar arrays mounted on existing roofs or integrated into new roofs/buildings.

Given the above policy support, the wider environmental benefits associated with increased production of energy from renewable sources mean that the proposed solar panels would make a valuable contribution to cutting greenhouse gas emissions, and this should be afforded significant weight. As discussed above, whilst there may be some visual impact from this element of the proposal, the benefits of this renewable energy are considered to outweigh any such concern.

### **Conclusion**

The proposed development enables the diversification of an agricultural business, is well-related to existing development and appropriate in relation to the character of its surroundings, in line with the rural business development aims of the NPPF 2026. As the proposal would involve the conversion without extension of the existing permanent, substantial and lawful agricultural buildings on the site, it would be considered to meet the Policy GB7 exception and would be considered 'not inappropriate' development in the Green Belt. The proposal would also be acceptable with regard to landscape, heritage asset, residential amenity, parking and highways, biodiversity, flooding and energy impacts, and would therefore be in accordance

with the requirements of Sections 5, 7, 10, 12, 13, 14, 15, 16, 17, 18, 19 and 20 of the NPPF 2026, Policies CS02, CS07, CS11, CS12, CS19 and CS20 of the Core Strategy 2014 and saved Policies TC3, TC7, T1, T5 and P3 of the Local Plan First Review 1994.

### Recommendation

Permission subject to conditions.

(For detailed conditions and informatives, see draft Decision)

|                      |                      |                     |                                       |
|----------------------|----------------------|---------------------|---------------------------------------|
| <b>Case Officer:</b> | Mrs Katherine Parkin | <b>Team Leader:</b> | <b>Richard Hart</b>                   |
| <b>Signed:</b>       | <i>K. Parkin</i>     | <b>Signed:</b>      | <i>R Hart</i>                         |
| <b>Dated:</b>        | 16 September 2026    | <b>Dated:</b>       | <b>17<sup>th</sup> September 2026</b> |