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Kent
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Highways and Transportation
Kroner House
Eurogate Business Park
Ashford
TN24 8XU
Tel: 03000 418181
Date: 19 August 2026
Our Ref: UP

Application -	GB/20260696
Location -	Queens Farm, Queens Farm Road, Shorne, Gravesend, Kent, DA12 3HU
Proposal -	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 roofmounted 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).

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 routing 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 300m² 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 routing 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.

Yours faithfully

Director of Highways & Transportation

*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.