

Planning Statement

Client

Evesham Properties Limited

Property address

**Buildings at Queen's Farm
Queens Farm Road
Shorne
Gravesend
Kent
DA12 3HU**

Description

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, along with the conversion of an existing agricultural unit in a building to the west of the site to a workshop (Use Class E).

Date of issue

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File Ref

J102324

Senior Planning Consultant

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2. Introduction

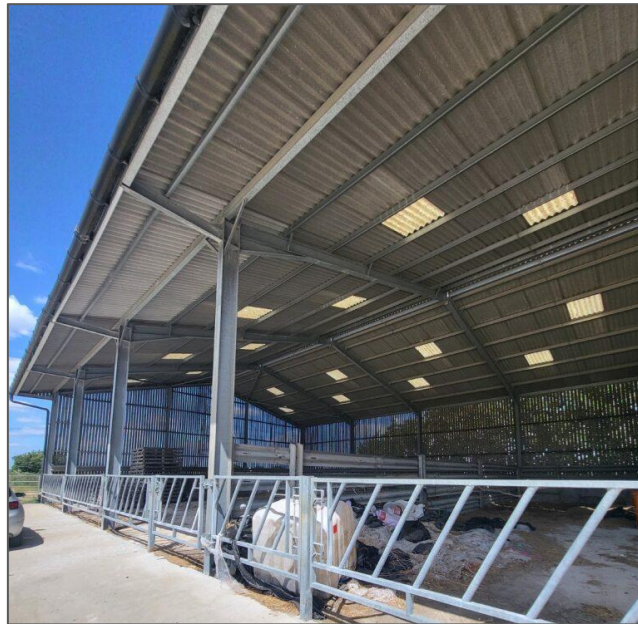
- 2.1. This planning statement is to support the planning application to Gravesham Borough Council for the change of use of the existing livestock building to create x5 light industrial (Use Class Eg(iii) / storage (Use Class B8) units with x1 agricultural unit, along with the conversion of an existing agricultural unit in a building to the west of the site to a workshop (Use Class E).
- 2.2. In this statement we outline and discuss the relevant planning considerations, including a description of the site, planning history, the relevant planning policy context for the proposal, details of the development, the key planning issues and from this draw our conclusions in support of the proposal.

3. Site & Location

3.1. The application site is comprised of three large modern, single storey detached agricultural buildings that form the main Queen's Farm farmstead, all served by an existing area of hardstanding in the centre.

3.2. An overview of each building on the site is given below.

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.

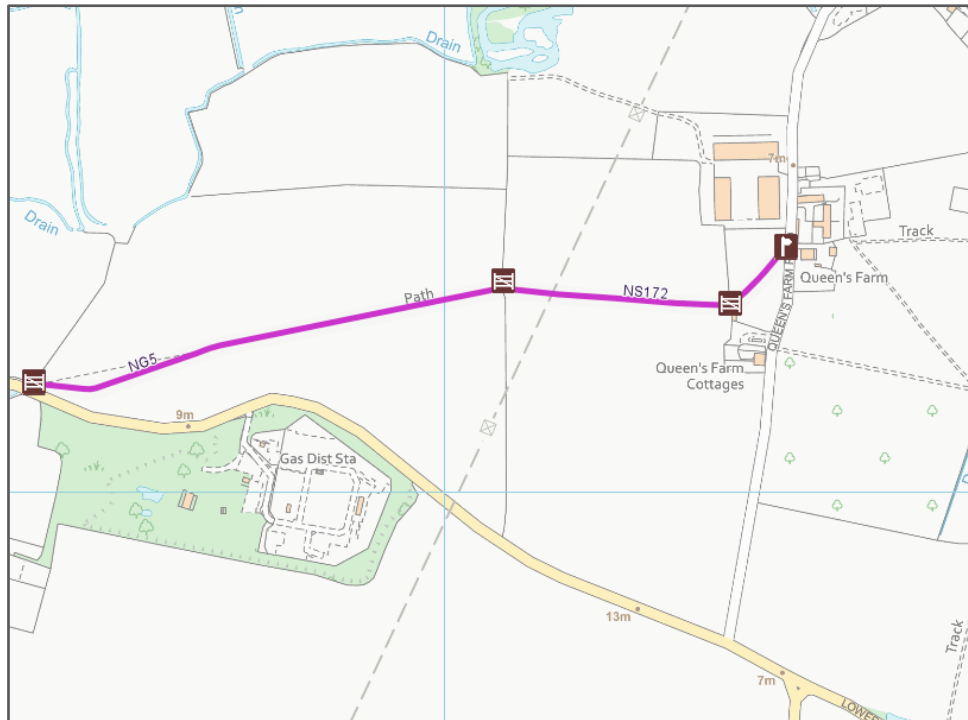


Building 3 is located to the east of the yard, closest to Queens Farm Road. The building is used as a grain store. This building does not form part of the proposal submitted under this planning application.

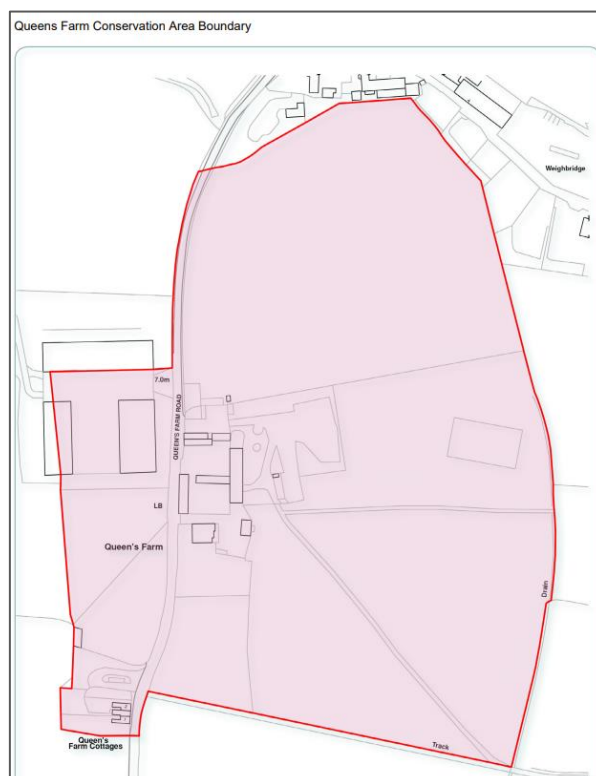
The configuration of the existing buildings on the site is identified on the map extract below.



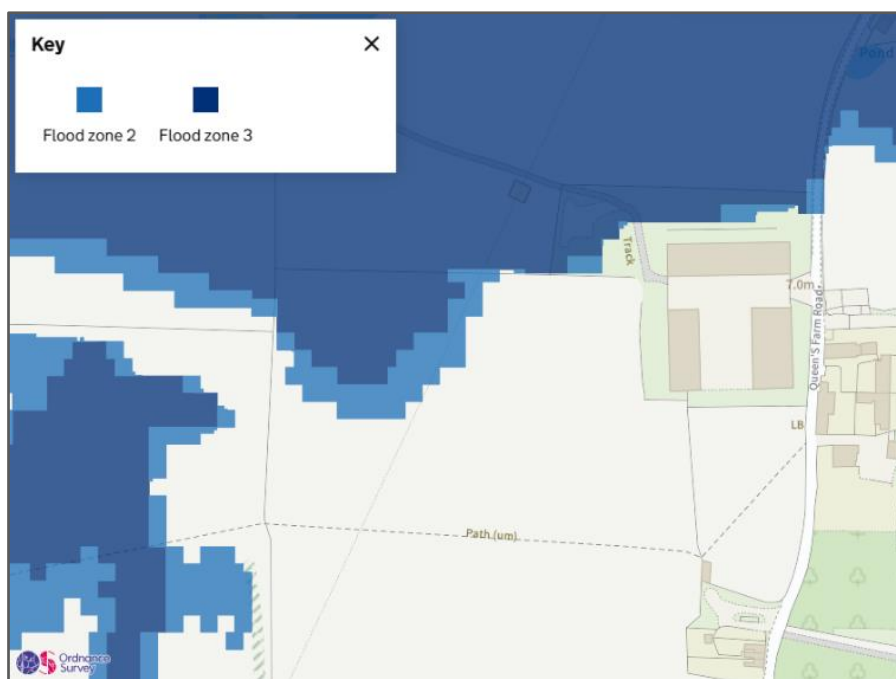
- 3.3. There are limited public footpaths in the area, footpath NS172 runs from Queens Farm Road westward back to Lower Road. This is indicated on the map extract below, taken from the Kent County Council Public Rights of Way Interactive Map.



- 3.4. The land is within the Metropolitan Greenbelt and the Queen's Farm Shorne Conservation Area extends partly around the farmstead associated with Queens Farm. A map extract taken from the Gravesham Borough Council Queens Farm Conservation Area Boundary Map is shown below for reference. A Heritage Statement accompanies this submission and is summarised in detail further within this Statement.



- 3.5. The application site falls within Flood Zone 1, land at least risk of flooding as is shown on the EA Flood Risk Map extract below. As the proposed development constitutes major development in Flood Zone 1, a Flood Risk Assessment accompanies this submission.



4. Planning History

- 4.1. The most relevant planning history for the application site is detailed below.
- 4.2. In 2019, under reference 20181303, a Prior Notification under Part 3, Class R of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) was granted for the change of use of Building 2 from agriculture to B1 (Business Use).
- 4.3. Planning permission was obtained retrospectively under reference 20240668 in 2025 for the change of use of the existing agricultural building to a joinery workshop (Use Class E). This related to Building 2 and is currently occupied by Craftworks Joinery.
- 4.4. Pre-application advice was obtained earlier this year from Gravesham Borough Council seeking advice on this proposal, ahead of the planning application being submitted. This was under reference PRE20250211. The advice obtained was largely positive, with the Officer concluding *“At this stage, provided further justification is put forward, development on this site in the manner proposed is likely to be acceptable in principle, and has the potential to comply with the requirements of paragraph 154 of the NPPF 2024 and not be inappropriate in the Green Bent, as well as being appropriate in terms of its impact on the Queens Farm Conservation Area, the Higham Arable Farmlands Landscape Character Area, residential amenity and highways”*. This submission seeks to provide the further justification requested within the pre-application advice response.

5. The Proposed Development

- 5.1. This planning application seeks to diversify the existing farm through the provision of new commercial units in addition to the existing joinery workshop that currently operates lawfully on the site.
- 5.2. The development proposed seeks to convert Building 1 into six individual bays, retaining one for agricultural use as a farm workshop (200 square metres), and converting five into light industrial/storage units (circa 203 square metres each). The submitted plans also include the provision for a future mezzanine floor, each 100 square metres.
- 5.3. The existing building is of a permanent and substantial construction, although some alterations are proposed to improve the building as part of the conversion. These alterations are shown on the plans which accompany this application, but include enclosing the southern elevation which is currently open, installing roller shutters to each proposed unit and replacing the existing cladding, roof materials and rainwater goods. Three new water butts are proposed on the north facing elevation of Building 1.
- 5.4. Solar panels are proposed to be installed on the south-facing roof slope of Building 1. These are shown on the proposed elevations submitted with this application and also on the detail sheets prepared by BeBa Energy. Units 2 – 5 are proposed to have 27 panels each and Units 1 and 6 are proposed to have 24 panels each.
- 5.5. The alterations proposed would not extend beyond the envelope of the existing building, ensuring that the development would not encroach into the Greenbelt.
- 5.6. The northern bay of Building 2, which is currently used for the storage of agricultural paraphernalia and machinery, is proposed to be converted to additional Class E workshop floorspace for Craftworks Joinery to expand into (circa 255 square metres). The existing agricultural unit would be re-located to the retained bay within Building 1. No external alterations are proposed to Building 2 for the change of use to come forward.
- 5.7. Two parking spaces are proposed to be allocated for each unit, totalling 14 designated parking spaces and a total of eight cycle parking spaces are proposed to serve the development. There is also ample space on the remainder of the existing hardstanding within the yard that can be utilised if required on an ad-hoc basis.
- 5.8. The existing development is not connected to mains drainage and a new Klargestor treatment plant is proposed to serve the proposed development.
- 5.9. No external lighting scheme is proposed for the development at this stage.
- 5.10. Improvements to the access within the applicant's ownership up to the highway boundary are proposed, which would comprise the laying of a 2 meter wide strip of tarmac across the 22 metre wide access. Details of this are shown on the Proposed Block Plan submitted with this application.

6. Planning Policy

- 6.1. Relevant National planning policy is provided in the National Planning Policy Framework (the Framework) together with the National Planning Practice Guidance. At a local level the development plan for the area consists of the Gravesham Local Plan Core Strategy and Local Plan Policies Map (2014), the Gravesham Local Plan First Review (1994) – saved Policies and the Kent County Council Minerals and Waste Local Plan 2024-2030 (adopted March 2025).

National Planning Policy Framework

- 6.2. The National Planning Policy Framework (the Framework) was published in December 2024. The Framework sets out the Government’s planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans can provide for sufficient housing and other development in a sustainable manner. Preparing and maintaining up-to-date plans should be seen as a priority in meeting this objective. At the heart of the Framework is a ‘presumption in favour of sustainable development’ and promotes ‘approving development proposals that accord with the development plan without delay’ (paragraph 11).
- 6.3. Paragraph 11 addresses both decision making and decision taking; from allocating sites to granting planning permission for a scheme and requires consideration of three objectives of sustainable development (economic, social and environmental).
- 6.4. Where relevant policies are out of date, the Framework is clear that planning permission should be granted unless ‘any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework when taken as a whole or specific policies in this Framework indicate development should be restricted’.
- 6.5. Paragraph 39 of the NPPF requires Local Planning Authorities to approach decisions on proposed developments in a positive and creative way and should seek to approve applications for sustainable development where possible. In accordance with paragraph 48 planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. Decisions should be made as quickly as possible.
- 6.6. The NPPF seeks to build a strong, competitive economy and to promote healthy and safe communities, that are attractive and well-designed (paragraph 96) and enhance public rights of way (paragraph 105). Paragraph 89 sets out the requirements for supporting a prosperous rural economy, including the development and diversification of agriculture.
- 6.7. The NPPF aims to ensure the creation of high quality, beautiful and sustainable buildings and places (paragraph 131), whilst great weight should be given to outstanding or innovative design, while paragraph 139 states that development that is not well designed should be refused, specifically where it fails to reflect local design policies and government guidance on

design. Importantly, it recognises that significant weight where such guidance and policies are met, paragraph 139 (a).

- 6.8. Paragraph 135(f) seeks for planning decisions to ensure a high standard of amenity for existing and future users.
- 6.9. The need to meet the challenge of climate change and flooding is addressed in Section 14 of the NPPF. Paragraph 164 specifically requires that new development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change. While paragraph 170 states that; Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- 6.10. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of the Green Belts are their openness and their permanence.
- 6.11. Paragraph 153 of the Framework stipulates when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. 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 is by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 6.12. Paragraph 154 sets out that development in the Greenbelt is inappropriate unless one of the following exceptions applies:
- a) buildings for agriculture and forestry;
 - b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
 - c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
 - d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
 - e) limited infilling in villages;
 - f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
 - g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.

h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

- i. mineral extraction;
- ii. engineering operations;
- iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- iv. the re-use of buildings provided that the buildings are of permanent and substantial construction;
- v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
- vi. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.

- 6.13. The Framework acknowledges the importance of heritage assets, including archaeological remains (paragraph 207).
- 6.14. While in relation to heritage assets where these are affected by proposals the NPPF at paragraph 215 sets a test for development that requires for proposals that will lead to less than substantial harm to the significance of a designated heritage asset, for this harm to be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Gravesham Local Plan Core Strategy

- 6.15. The Gravesham Local Plan Core Strategy provides a broad planning policy framework for development within the borough. It requires a sustainable approach to development (Policy CS01) and seeks to guide development to the existing urban areas (Policy CS02) identifying the amount of new development required within the borough over the plan period.
- 6.16. Policy CS02 of the Core Strategy requires that development outside of defined settlements, including affordable housing and proposals to maintain and diversify the rural economy, will be supported where it is compatible with national policies for protecting the Green Belt and policies in the plan. The extent of the Green Belt is defined on the Policies Map. A strategic Green Belt boundary review will be undertaken to identify additional land to meet the housing needs up to 2028 and to safeguard areas of land to meet development needs beyond the plan period, while maintaining the national and local planning purposes of the Green Belt.
- 6.17. Policy CS07 states the Council will seek to secure the delivery of around 186,490 sqm gross new employment floorspace over the plan period. In considering development proposals, particular support will be given to schemes incorporating small and flexible industrial and/or office workspaces of high quality intended to support the start-up and expansion of small and medium sized enterprises. The Council will support proposals that promote the appropriate expansion and diversification of the rural area economy. Support will be given to the conversion of rural buildings to employment use/live-work units where it is compatible

with national policies for protecting the Green Belt and where it accords with the policies in this plan, in particular relating to Green Infrastructure.

- 6.18. Policy CS11 supports states new developments should mitigate their impact on the highway and public transport networks are required.
- 6.19. Policy CS12 relates to Green Infrastructure and states there will be no net loss of biodiversity in the Borough and the overall landscape character and valued landscapes will be conserved, restored and enhanced.
- 6.20. Policy CS18 discusses Climate Change specifically flood risk, water quality, sustainable drainage and surface water run-off, water demand management and carbon reduction.
- 6.21. Policy CS19 sets out the Councils Development and Design Principles. It states new development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. The design and construction of new development will incorporate standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change.
- 6.22. Policy CS20 states the Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place. Proposals will be supported which preserve and, where appropriate, enhance the significance of the Borough's heritage assets, their setting where it contributes to the significance of the asset and their interpretation and enjoyment, especially where these contribute to the distinct identity of the Borough. When considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset. For non-designated assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset.

Gravesham Local Plan First Review

- 6.23. Policy T1 states 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.
- 6.24. Policy T5 states 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 Authority.
- 6.25. Policy P3 states the Borough Council will expect development to make provision for vehicle parking, in accordance with the Kent County Council Vehicle Parking Standard, as interpreted by Gravesham Borough Council, unless justified as an exception. All vehicle parking provision should normally be made on the development site.

7. Consultants Reports

7.1. The application is supported by the following documents:

- Design & Access Statement prepared by Lee Evans Partnership
- Heritage Statement prepared by JF Heritage
- Preliminary Roost Assessment (Bats) and Nesting Bird Assessment prepared by South East Ecology
- Noise & Vibration Impact Assessment prepared by MRL Acoustics
- BREEAM Pre-Assessment prepared by Kent Sustainability
- Agricultural Justification Report prepared by Hobbs Parker
- Flood Risk Assessment prepared by Hobbs Parker
- Energy Statement prepared by Energytest
- Transport Statement prepared by Markides Associates

A summary of these reports is provided below.

Agricultural Justification Report prepared by Hobbs Parker

- 7.2. This Report provides the context for the planning application and justification for the conversion of the existing agricultural buildings to light industrial and storage uses.
- 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

Heritage Statement prepared by JF Heritage

- 7.9. This Statement provides a description of the significance of the heritage asset and/or its setting and sufficient information to understand the impact on any heritage assets affected, in accordance with Paragraph 207 of the NPPF. The Statement provides an overview of the site, the character of the conservation area, details of the proposed development and its impact on the character of the conservation area.
- 7.10. The existing buildings are modern and considered to make a neutral contribution to the character of the Conservation Area, in that they continue the established agricultural use of the site and wider landscape. They are of limited architectural and aesthetic interest.
- 7.11. The Queens Farm Conservation Area derives its significance from the well-preserved survival of a historic agricultural complex set within a predominantly rural marshland landscape. The conservation area is characterised by a coherent group of buildings, including the farmhouse, associated farm buildings and workers' cottages, which together illustrate the historic organisation and operation of a traditional farmstead with origins in the nineteenth century and earlier.
- 7.12. The works proposed to Building 1 under this application relate to a modern agricultural structure that makes a neutral contribution to the significance of the Queens Farm Conservation Area. The design approach maintains the building's functional and utilitarian character, which remains consistent with existing agricultural and commercial buildings on the site.
- 7.13. The development proposed within Building 2 would be consistent with the established use of the rest of the building and reflects the existing utilitarian character of the building. Given that the significance of the Queens Farm Conservation Area derives primarily from the coherent grouping of the farmhouse, historic farm buildings, yards, and workers' housing, given the location and the proposals would not erode this special interest.
- 7.14. The design choices have been informed by the Queens Farm Conservation Area Appraisal and Management Plan and the proposed development responds positively to the appraisal's guidance by reintroducing appropriate architectural detailing and preserving the character of the area.
- 7.15. The proposed solar panels would be mounted on the roof of an existing modern building and while they would introduce a contemporary element, they would be viewed in the context of a modern agricultural building that is already characterised by functional materials and utilitarian design. The panels would not affect the historic farmstead, key views of the historic buildings, or the legibility of the conservation area's historic agricultural core. Consequently, their impact on the significance of the conservation area would be negligible. The inclusion of renewable energy accords with Policy CS19 and incorporates low carbon technologies whilst preserving the significance of heritage assets.

The proposal would therefore preserve its character and appearance, in accordance with statutory duties and local policies including CS20 of the Core Strategy 2014.

- 7.16. The proposals align with the key principles outlined in the NPPF and the works have sustained the appearance and character of the conservation area, demonstrating compliance with the requirements of the NPPF.
- 7.17. In light of the relevant statutory duty of the Planning Act (s.72(1)), special attention has been paid to the desirability of preserving or enhancing the character and appearance of the Queens Farm Conservation Area. The proposals satisfy the requirements of the statutory duties in that they preserve both the character and appearance of the Queens Farm Conservation Area.
- 7.18. The proposed works to be carried out to Building 1 would not result in harm to the character or appearance of the Queens Farm Conservation Area. The solar panels would be located on a modern agricultural building that makes a neutral contribution to significance and would not affect the historic farmstead or its setting. The proposals therefore preserve the significance of the conservation area whilst supporting the continued viable use of the site and the adoption of sustainable energy measures.

Preliminary Roost Assessment (Bats) and Nesting Bird Assessment - South East Ecology

- 7.19. A daytime assessment of the application site was undertaken on the 24th March 2026 to inform the Preliminary Roost Assessment and Nesting Bird Assessment.
- 7.20. The site was assessed for the suitability to support roosting bats and the potential for the site to support foraging and commuting bats. The site was also assessed for suitability for nesting birds; this included identifying structures that could be used for nesting as well as access to internal features.
- 7.21. No birds that the SSSI, SPA and Ramsar are designated for within 2km of the site are likely to nest within the site due to the lack of suitable habitat. Therefore, no further action is required in terms of bird-designated protected sites.
- 7.22. The site is located within the South Thames Estuary and Marshes SSSI Impact Risk Zone; however the development does not meet criteria for impacts that would lead to a significant effect on the SSSI due to the development being limited to the existing hard-standing.
- 7.23. No trees are located within the site but the buildings do offer nesting opportunities for birds with access to the building comprising an open front on the southern elevation. Building 1 holds high potential for widespread species of nesting bird; building 2 did not have any external features suitable for nesting birds and there was no internal access.
- 7.24. The site overall holds negligible potential for bird species listed as Annex I (Birds Directive) and / or Schedule 1 (WCA). The small nature of the site, lack of suitable habitats and heavy

levels of disturbance mean that the site has negligible potential for notable wintering bird species and assemblages.

- 7.25. In terms of bats, the preliminary roost assessment determined that Buildings 1 and 2 hold negligible suitability for roosting bats during the active and hibernation seasons and no further action for roosting bats is required.
- 7.26. The site itself is of negligible suitability for foraging and commuting bats, due to a lack of suitable habitats. It is possible commuting bats may occasionally pass over the site and forage and commute within adjacent habitats and be impacted by any temporary increase in artificial lighting during the works.
- 7.27. The Report provides avoidance and mitigation measures. For nesting birds, there is potential for birds such as feral pigeons to nest in Building 1 all year round and a competent person should check ahead of works for any active nests irrespective of time of year. Any active nests identified must be retained in situ with a suitable buffer (to be determined by an ecologist) until the chicks have fledged and the nest is no longer active.
- 7.28. Once works have started, the regular disturbances should deter nesting birds from any retained features. However, if works are paused for more than 72 hours during the breeding season, suitable features should be blocked until works resume to deter nesting birds from moving in, or a check for nesting birds should be carried out immediately before works resume.
- 7.29. The report recommends the following measures should be implemented to reduce impacts on foraging and commuting bats caused by artificial lighting:
- Direct any task lighting used during construction away from off-site trees and hedgerows and any newly installed bat boxes;
 - Set any necessary security lighting on short timers with a sensitivity to large moving objects only;
 - Limit lighting times to provide dark periods; and
 - LED light sources should be used wherever possible. A warm spectrum light (ideally <2700 Kelvin) should be used to reduce the blue light component. Lights should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats.
 - Luminaires should be mounted on the horizontal
 - Avoidance of the use of UV light and do not use metal halide, fluorescent light sources.
- 7.30. The Report recommends the following enhancements:
- Install one Schwegler 1B General Bird Box (or suitable long-lasting alternative) onto a building (new or retained) at least 3m above the ground, avoiding direct sunlight (not directly south-facing) and prevailing wind.
 - Install one Greenwood Half and Half Bat Box (or suitable long-lasting self-cleaning alternative) onto a building (new or retained). Install the bat box at least 4m above the ground and face in a southerly or easterly direction, so that they received sun for part of the day. Place box clear of any obstructions to allow access for bats (e.g over-hanging branches).
- 7.31. The Report concludes the development can proceed with minimal impact to habitats and protected/notable species if the avoidance and mitigation measures are implemented and

there is an opportunity to enhance the development for local wildlife in the long-term by implementing the recommended enhancement measures.

Flood Risk Assessment

- 7.32. The site is within Flood Zone 1 and has a low probability of flooding from rivers and the sea. Flood Zone 1 is the area least likely to flood and therefore it is considered, since the site is not considered to be at risk from flooding, the proposed development would accord with the requirements of paragraph 174 of the NPPF.

BREEAM Pre-Assessment prepared by Kent Sustainability

- 7.33. The proposed development falls under BREEAM Refurbishment. The Report has carried out the pre-assessment based on the proposed plans and relates to those credits which have potential to be achieved. The report details the scores achieved and has resulted in a suggested score of 68.08% which falls within the VERY GOOD category.
- 7.34. Appendix 1 of the Report sets out a description of the credits and should be referred to.
- 7.35. Following receipt of the pre- and post-refurbishment EPCs, the score is anticipated to rise above 70%, achieving Excellent.

Noise & Vibration Impact Assessment prepared by MRL Acoustics

- 7.36. The Noise & Vibration survey was carried out on the 14th April 2026 between the hours of 08:00 until 17:00 and consisted of consecutive 30-minute samples of noise in order to represent the ambient external noise climate at the residential boundary during a typical weekday period.
- 7.37. The noise survey was carried out in general accordance with the requirements outlined in BS 7455 – 1 : 2003 for environmental noise surveys. It should be noted the existing livestock building at the northernmost part of the site was not in use at the time of the survey and therefore there was no contribution of noise upon the measured ambient noise climate from this particular building.
- 7.38. The results of the survey indicated that at the noise monitoring position at the site boundary at the entrance to Queens Farm, the existing ambient daytime external noise climate is 62 Db LAeq.
- 7.39. The report considers for the daytime period (08:00 – 17:00 hours), the noise emissions from the new units should not exceed 57 Db LAeq when assessed at the residential boundary. In terms of the background noise climate, we would consider that the noise

emissions from the new units should not exceed 42 dB LA90 when assessed at the residential boundary.

- 7.40. Noise from any proposed storage units should not be an issue as these generally do not generate significant levels of noise.
- 7.41. To minimise noise break-out and noise impact from the industrial buildings, the report recommended the following outline design measures:-
- The envelope construction for the walls and roofs of the new units (excluding roller shutters) including any roof-lights, should have a minimum sound reduction index of at least 25 Db Rw;
 - For the proposed industrial units, additional sound insulation linings may need to be added depending upon the end-user of each unit;
 - All gaps at the junction of the walls with the roof panels should be sealed as part of any overall cladding system;
 - Any access doors, fire escape or small personnel doors, should have a minimum sound reduction performance of at least 25 Db Rw to minimise any noise break-out;
 - If any external building services plant is proposed, then it should be designed with a total resultant noise level of a maximum of 42 dB LAeq, when assessed at the nearest affected residential boundary and it should not operate during the night-time period unless a specific scheme of noise mitigation measures is provided so as to not exceed 35 dB LAeq at the nearest affected residential boundary.
- 7.42. The results of the vibration survey indicated that the existing vibration levels at the site boundary amount to vibration dose values (VDVs) that are lower than the thresholds for the onset of annoyance that are quoted in BS 6472.
- 7.43. Currently the plant and machinery that will be installed within the light industrial units is unknown, however it would be prudent to recommend that any heavy duty fixed plant and machinery that produce high levels of vibration should all be fitted on suitable anti-vibration mounts and pads with any associated ductworks, service cables, etc also fitted on anti-vibration mounts.
- 7.44. These measures should be designed to ensure the measured existing vibration levels are not increased. It is expected that any amplification of vibration from transfer functions will not be significant, ensuring that vibration levels experienced by the existing residents of the nearby dwellings will still be within the range of 'low probability of adverse comment'.
- 7.45. In conclusion, it is considered that with the careful design of the commercial buildings and any plant and machinery to be used, that the proposed commercial development scheme at the Queens Farm site should not result in a significant noise and vibration impact or adverse effect on any existing local residential amenity.

Energy Statement

- 7.46. The design of the proposal has been developed to address the Renewable and Low Carbon Energy requirements of the Council.
- 7.47. A base has been developed, against which potential savings have been assessed. As this proposal constitutes a change of use, the baseline has been established based on the minimum requirements of Approved Document L2 (2021).
- 7.48. The development features improved insulation and air tightness standards, when compared against the compliance requirements of Approved Document L2 2021 of the Building Regulations. In addition, the development will incorporate a mechanical and electrical specification that surpasses the requirements of Approved Document L2 2021.
- 7.49. Having minimised energy consumption in the first instance, the potential for remaining energy demands to be met via decentralised energy source as been considered as part of developing the proposal. This development is neither within the coverage of an existing district heating network, nor is there an expectation that a district heating network will be developed at this site in the near future. Due to its size, the development is not suitable for combined heat and power.
- 7.50. Achieve Green have carried out an assessment to determine the potential for renewable energy systems to reduce CO2 emissions further. In order to meet the expectations of the Local Planning Authority, it is intended that photovoltaic arrays totalling 73.32 kWp shall be installed upon the available roof area.
- 7.51. The total reduction in emissions resulting from energy efficiency measures and the insulation of renewable technology is 81.4% compared to the regulated emissions from a building designed to just meet Building Regulations (2021) Part L2.

Transport Statement prepared by Markides Associates

- 7.52. Markides previously prepared a Transport Scoping note which was submitted to KCC Highways & Transportation Services under their pre-application advice service.
- 7.53. As part of the pre-application discussions, KCC raised the following matters:
- The need to ensure appropriate surfacing at the site access to prevent loose material entering the public highway;
 - Consideration of the suitability of the surrounding rural road network for larger vehicles;
 - The provision of up-to-date collision data and associated analysis;
 - The requirement to review trip generation using appropriate Use Class comparators; and
 - The need to provide further detail in relation to parking, servicing, and vehicle manoeuvring.
- 7.54. The Transport Statement has been prepared having regard to the Scoping Note and the pre-application advice response and seeks to address the matters raised to demonstrate that the proposals are acceptable in highway and transport terms.
- 7.55. The report demonstrates that the development would not result in a material or severe impact on the operation of the surrounding highway network, in accordance with national and local planning policy.
- 7.56. The site is accessed from Queens Farm Road, which is a single carriageway two way road that provides access to residential properties and industrial units. It is a lightly trafficked road, generally single carriageway in nature, with a variable width and informal passing opportunities. Although the road is subject to national speed limit, actual vehicle speeds are influenced by the nature of the route, resulting in a generally self-regulating environment, with vehicles travelling at reduced speeds.
- 7.57. As such, any larger vehicles associated with the development would be expected to utilise appropriate routes that are suitable for their size and nature, avoiding restricted sections of the network. This reflects existing access patterns to the site and the wider localised businesses at the end of Queens Farm Road, and can be managed, where necessary, through routeing arrangements and operator awareness.
- 7.58. The existing concrete yard provides sufficient space for parking, manoeuvring, and servicing, including access for delivery vehicles and occasional HGVs. All vehicles will be able to enter, turn and exit the site in a forward gear.
- 7.59. Visibility splays of approximately 48m in both directions are achievable from the site access (based on a driver reaction time of 1.5 seconds and a deceleration rate of 4.41m/s²) and

can be accommodated within land under the control of the applicant, demonstrating that the access is suitable to serve the proposed development.

- 7.60. In accordance with comments received from KCC from the pre-application advice, appropriate surfacing will be provided at the site access to ensure that loose material does not migrate onto the public highway.
- 7.61. Two demarcated spaces are proposed per unit. Whilst adopted parking standards for B2 and B8 uses are typically expressed on a floorspace basis and would ordinarily generate a higher level of provision, the proposed units are relatively small in scale and are expected to operate with low staff numbers, with a significant proportion of floorspace given over to storage, workshop, or operational activity.
- 7.62. There is sufficient space within the site to accommodate additional parking on an informal basis if required, without impacting the operation of the surrounding highway network. For cycle parking, this can be stored within the individual units themselves.
- 7.63. Three trip generation assessments have been undertaken using three separate land use scenarios – Light Industrial E(g)(iii), Storage B8 and Farm Diversification. The Farm Diversification scenario is considered to provide the most representative reflection of the proposed development, aligning with the location and existing agricultural use of the site, as well as the nature of the proposals as a farm diversification scheme supporting small-scale employment uses.
- 7.64. The assessment demonstrates that the proposed development would generate low levels of traffic across all scenarios, with limited peak hour demand and low goods vehicle activity. Such levels of traffic are not material in the context of the surrounding rural highway network and would not give rise to any discernible impact on highway capacity or safety. In this context, the proposals accord with paragraphs 88 and 89 of the National Planning Policy Framework, which support the sustainable growth and diversification of agricultural and other land-based rural businesses.
- 7.65. The development represents a small-scale rural employment use with limited traffic implications and, as such, will not result in an unacceptable impact on highway safety or a severe residual cumulative impact.
- 7.66. The report concludes that the proposed development can be satisfactorily accommodated in highways and transport terms. There are no highways or transport-related reasons why planning permission should be withheld.

8. Conclusions

Principle of development and Greenbelt considerations

- 8.1. The National Planning Policy Framework (NPPF) details that development in the Green Belt is inappropriate unless one of the specified exceptions set out in paragraph 154 applies. Paragraph 154 h) supports the re-use of buildings in the Green Belt provided that the buildings are of a permanent and substantial construction and that the development preserves the openness of the Green Belt and does not conflict with the purposes of including land within it. Further, the NPPF is supportive of the sustainable growth and expansion of all types of business in rural areas, through the conversion of existing buildings and of the diversification of agricultural businesses. Gravesham Local Plan Core Strategy policy CS02 is supportive of development to diversify the rural economy where it is compatible with national policies for protecting the Green Belt and policy CS07 also seeks to support proposals that promote the appropriate expansion and diversification of the rural economy, with support given to the conversion of rural buildings to employment use/live-work units where it is compatible with national policies for protecting the Green Belt and where it accords with policies in the Core Strategy, in particular relating to Green Infrastructure.
- 8.2. The existing livestock building is a modern building with a solid steel portal frame and a fully intact roof (as evidence within the photographs shown in Section 3.2 of this report). The building does not require substantial re-building to be converted and is of a permanent and substantial construction suitable for conversion as required by paragraph 154 h) of the NPPF. Similarly, the end-bay of Building 2 is a modern building, of a substantial and permanent construction as is evident from the conversion works that have already taken place within the building to provide the workshop for Craftworks Joinery. No development is proposed to extend beyond the envelope of the existing building, meaning no development would encroach into the Green Belt and wider landscape, ensuring that the openness of the Green Belt would be preserved.
- 8.3. The proposed development would constitute an acceptable form of diversification in the rural area, supplementing the existing Class E use that currently operates from within the site. The Agricultural Justification Statement which accompanies this planning application provides details on the history of farming on the land and commentary as to how the agricultural needs of the land have changed over time. Since 2024 the livestock building has become largely redundant due to the reduction of grazing land at Queens Farm and has been let on a licence agreement to a local farmer who has used the building occasionally to store farm machinery and bales. The building has not been used to its full capacity as the land does not support a sufficient number of livestock to fully occupy the building over the winter months. Given the farm is now predominantly arable and the grain store within Building 3 is proposed to be retained, there is no longer an agricultural need for a large livestock building and the proposal to convert the building to a commercial use has been based on the assessment of the business needs to diversify and adapt with the changing environment whilst making use of existing assets to generate income for the business.
- 8.4. Therefore the proposal would represent an appropriate form of development within the Green Belt in line with the exceptions detailed in paragraph 154 of the NPPF and through promoting diversification of the rural economy, would in turn also meet the aims of policies CS02 and CS07 of the Gravesham Local Plan Core Strategy.

Visual Impact and Landscape Character

- 8.5. The development would introduce additional industrial / storage uses to the site in lieu of the existing agricultural use. Given the proposed development would not extend beyond the envelope of the existing buildings, it is not considered there would be any adverse impact upon the Higham Arable Farmlands Landscape Character Area. The cladding and roof materials found on Building 1 are proposed to be replaced with composite panels for greater durability and thermal efficiency, while also ensuring the finish is in keeping with the rural nature of the area and surrounding buildings. The cladding proposed to the elevations would be green in colour to ensure it appears in keeping with the existing development already found on the site. The pre-application advice response received concluded “...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 Higham Arable Farmlands Landscape Character Area, and the proposal would therefore conserve landscape character and comply with landscape policy requirements”.
- 8.6. Since the pre-application advice submission, the scheme has evolved to now include solar panels on the southern roof-slope of Building 1. Given that this roof slope faces into the site and the existing courtyard, it is not considered that these would be significantly visible from outside of the application site. Paragraph 167 of the NPPF requires local planning authorities to give significant weight to the need to support energy efficiency improvements to existing non-domestic buildings through the use of solar panels and therefore the benefits of introducing renewable energy techniques into the scheme should, when balanced against the limited visual impact these would introduce, be supported by the Council.

Design and heritage considerations

- 8.7. The Heritage Statement, produced by JF Heritage which accompanies this application, confirms that the design choices of the proposal have been informed by the Queens Farm Conservation Area Appraisal and Management Plan, which identifies the key characteristics, building typologies, and materials that contribute to the special interest of the area. The proposal responds positively to the appraisal’s guidance by reintroducing appropriate architectural detailing and preserving the character of the area.
- 8.8. The pre-application advice response from the Council confirmed the proposed cladding and roof material would be in keeping with the utilitarian and rural appearance of the existing buildings and would not have an adverse impact on the character and appearance of the Conservation Area.
- 8.9. Following the pre-application discussions, the only amendment to the design of the scheme has been the addition of the solar panels. The accompanying Heritage Statement has provided an assessment of their impact upon the Conservation Area, which notes these would be located on an existing modern building and although they would introduce a contemporary element, they would be viewed in the context of a modern building already characterised by functional materials and utilitarian design. The addition of the panels would not impact upon the historic farmstead, key views of historic buildings, or the legibility of the Conservation Area’s historic agricultural core.
- 8.10. The proposal therefore represents an appropriate and sympathetic development in the Conservation Area, preserving its character and appearance and would meet the aims of

paragraph 135 of the NPPF, and policies CS19 and CS20 of the Gravesham Local Plan Core Strategy.

Residential amenity

- 8.11. The hours of operation proposed for the light industrial units is between the hours of 08:00 to 18:00 which is consistent with the hours permitted for the existing Craftworks Joinery Workshop which operates from Building 2, as secured by condition under application reference 20181303.
- 8.12. The nearest residential properties are on the eastern side of Queens Road, opposite the existing access. Currently the joinery workshop which operates partly within Building 2, does so harmoniously with the adjoining land uses both within the site, and with the residential properties to the east. The application is accompanied by a Noise and Vibration Assessment produced by MRL Acoustics which concludes that noise from any proposed storage units would not have an adverse impact upon neighbouring amenity as these generally do not generate significant levels of noise. The report recommends mitigation measures which will ensure that the proposed development would not result in a significant noise and vibration impact or adverse effect on any existing local residential amenity.
- 8.13. On this basis, the proposed development would meet the aims of paragraph 135 f) of the NPPF and Core Strategy Policy CS19 with regard to amenity.

Ecology

- 8.14. The application is accompanied by a Preliminary Roost Assessment (Bats) and Nesting Birds Assessment which has been prepared by South East Ecology. In terms of birds, the report considers 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.
- 8.15. The report details avoidance and mitigation measures for the development to follow which are detailed within the Report and summarised in Section 7 above. Subject to the avoidance and mitigation measures being implemented, the proposed development would not impact upon habitats and protected/notable species and the development would comply with paragraph 187 of the NPPF and policy CS12 of the Local Plan Core Strategy.
- 8.16. In terms of biodiversity net gain, the application proposes to convert the existing buildings and utilise the existing hardstanding in the forecourt. Photographs of the existing hardstanding has been submitted alongside this application. On this basis, it is considered that the proposed development would fall within the exemption category for mandatory biodiversity net gain, as the proposed development would not impact a priority habitat and would impact less than 25 square metres of on-site habitat.

Sustainability

- 8.17. In line with local validation requirements, this application is accompanied by a BREEAM Pre-Assessment and an Energy Statement. The BREEAM Pre-Assessment has calculated that the

proposed development could result in a suggested score of 68.08% which falls within the VERY GOOD category.

- 8.18. As detailed within the submitted Energy Statement, the proposal has been designed to address the Renewable and Low Carbon Energy requirements of the Council. The proposed development will achieve compliance with Approved Document L1 2021 without reliance on the contribution of renewable technology. Improvements are proposed to the fabric of the existing building which would reduce energy demand and the development further seeks to reduce energy consumption through the specification of mechanical and electrical systems with efficiencies that surpass the requirements of Approved Document L1 2021, detailed within the Energy Statement. However, in addition to these measures, it is proposed that a further reduction will be achieved through the installation of solar panels totalling 73.32 kWp.
- 8.19. A specification sheet of the proposed panels has been submitted alongside this planning application.
- 8.20. On this basis, the proposed development would provide energy efficiency measures that align with local and national planning policy aims of reducing CO2 emissions.

Highways and parking

- 8.21. The existing vehicular access from Queens Farm Road is proposed to be utilised. Formal pre-application advice discussions have been undertaken with KCC Highways on this proposal and their formal written response, dated 14th August 2025, was shared during the pre-application process with Gravesham and is provided within the accompanying Transport Statement to this application. In principle, the response did not raise any concerns that would prevent the development from coming forward and the issues identified within the response have been addressed in the Transport Statement prepared by Markides Associates submitted with this application.
- 8.22. A particular point to be noted is that KCC Highways have suggested highways improvements, including resurfacing, may be requested where the highway meets third-party land, given the proposed increase in vehicle trips that may further deteriorate the highway and / or cause material to fall onto the highway. There are other existing uses along Queens Farm Road, to the north of Queens Farm, which create heavy traffic movement, particularly of skip-lorries, which is considered to have contributed to the damage to the highway, above and beyond the traffic movements associated with the current operations at Queens Farm.
- 8.23. However, to address concerns raised by KCC, this application proposes improvements to the surfacing of the existing access onto Queens Farm Road that is within the applicants ownership. This is denoted on the Proposed Block Plan. This has been included following the pre-application advice obtained from Gravesham which stated “[KCC] have also recommended improvements to the unmade part of the entrance to the site, which appears to be included in the red line up to the highway. Resurfacing here can be included as part of any planning application”.
- 8.24. It is therefore considered, and in light of the pre-application advice received from Gravesham, that the proposed improvements to the surface of the access within the

applicant's ownership would sufficiently overcome the concerns raised by KCC Highways and would be proportionate.

- 8.25. The Transport Statement confirms visibility splays of 48 metres in both directions are achievable from the site access and can be accommodated within land under the control of the applicant. The Statement further identifies the existing number of trips generated from existing uses within the site and details proposed trips as a result of the proposed development. The development is expected to generate low levels of traffic, with limited peak hour demand and low goods vehicle activity and would not give rise to any discernible impact on highway capacity or safety, according with paragraphs 88 and 89 of the NPPF.
- 8.26. The development proposes the provision of two allocated parking spaces per unit, totalling 14 allocated parking spaces. This provision is in accordance with KCC Vehicle Parking Standards and is therefore considered to be policy compliant. There is also ample hardstanding within the existing concrete yard that can provide ad-hoc parking as and when required, without impacting upon the allocated parking spaces. The KCC minimum cycle parking standards require 1 cycle parking space per 200m² of B8 and E(g) floorspace. 8 cycle parking spaces are proposed and shown on the Proposed Block Plan, although again there is ample space on the site for additional provision should there be demand for this. The concrete yard also provides sufficient space for manoeuvring and servicing, including access for delivery vehicles and occasional HGVs ensuring there would be no adverse impact upon the local highway network.

Conclusion

- 8.27. Taking the above into account, it is our considered view that the proposed development, which has been shaped following pre-application advice discussions with both Gravesham Borough Council and KCC Highways & Transportation Services, accords with the overarching aims of the NPPF and Gravesham Borough Council Development Plan and in these circumstances, it is respectfully requested that planning permission be granted.

Date of issue: 1st July 2026

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For and on behalf of Hobbs Parker Property Consultants LLP