



SUPPORTING PLANNING STATEMENT

New Green Farm, Lower Road, Shorne, Gravesend

June 2025

SUPPORTING PLANNING STATEMENT

In support of an application for the
Replacement of approved cold store with larger store

at
New Green Farm
Lower Road
Shorne
Gravesend

On behalf of

AC Goatham & Son Ltd

	INITIALS	DATE
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1. Introduction

- 1.1. This supporting planning statement has been prepared on behalf of our client, AC Goatham & Son to support an application for the replacement of an approved cold store with a larger store for the controlled atmospheric storage of top fruit at New Green Farm, Lower Road, Shorne, Kent.
- 1.2. The cold store obtained permission for its erection under a Prior Approval application, referenced 20240020. Gravesham Borough Council determined that Prior Approval was not required on the 29th of January 2024. This proposal seeks full planning permission to increase the size of this cold store.
- 1.3. This statement considers the proposed development in relation to the context of the site and demonstrates that the proposed development would constitute a sustainable form of development. The proposal is consistent with the objectives of the Local Development Plan, and there are no adverse impacts which would significantly and demonstrably outweigh the benefits in accordance with the National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG) and local planning policies within the Gravesham Local Plan Core Strategy.

2. Site Context

- 2.1. New Green Farm comprises of 67.5 hectares of owned land and a further 17.28 of tenanted land. The farm is located between the larger towns of Rochester and Gravesend, with Shorne and Higham villages lying to the south-west and south-east of the site. New Green Farm was purchased by AC Goatham & Son in 2018 and includes newly planted and producing top fruit comprising three different varieties and one having 3 different clones.
- 2.2. The farmyard comprises of an agricultural storage building, concrete yard area and the provision of up to six mobile homes for seasonal agricultural workers.
- 2.3. The proposed cold store is to be sited in the same location as the previously approved (under reference 20240020), to the south-east of the existing farmyard, buildings and seasonal workers accommodation at New Green Farm. **Figure 1** below is an aerial extract from Google Earth, showing the location of the proposed cold store in relation to the existing farmyard at New Green Farm.



Figure 1 – an aerial extract from Google Earth of the application site (in red).

3. AC Goatham & Son's Existing Farm Business

The Company

- 3.1. AC Goatham & Son are one of the largest growers of apples and pears in the UK. They farm over 2,400 acres of land all for top fruit (apples and pears), over 16 freehold farms and 13 farms rented on long term agreements across the southeast. It is understood that 1 in 4.5 home grown apples and 1 in 3 conference pears sold in Britain are grown and supplied by one of AC Goatham & Son's farms or partner farms.
- 3.2. AC Goatham and Son have been trading for over 70 years (currently spanning three generations of the Goatham family). Over this time, they have focused on extending the fruit growing season to substitute foreign fruit with home grown fruit and producing quality produce at affordable prices. To achieve this, the business has introduced new varieties of apples to allow harvest to start earlier, improved growing methodologies to increase yields and introduced cutting edge cold storage technology to allow for fruit to be stored longer through the year.
- 3.3. Retail customers are increasingly looking toward consolidated sites for distribution of fruit to them. Not only is this logistically easier to manage but it helps keep the overall cost of British fruit down so that it becomes affordable for the consumer. This allows, from a price perspective, the fruit to compete with the imported fruit which is much cheaper to produce (even after factoring in import costs) due to differences in soil and climate conditions.

Fruit handling

- 3.4. In June 2024, AC Goatham & Son signed a 20-year deal with supermarket chain Aldi, cementing an existing relationship which has seen the company provide apples and pears to Aldi since 2016. Part of this agreement will see the introduction of the 'Aldi Orchard', a 200-acre plot on New Green Farm. Growing a mix of Gala and Braeburn apples, AC Goatham and Son have also agreed to plant an additional 100 acres per year of apple trees exclusively for the supermarket.
- 3.5. 220,000 new fruit trees are planted across the business during the course of one season, with further plans for the next 5 years for in the order of 800,000 to 1,000,000 fruit trees to be planted. It is therefore imperative that they need the labour resources and infrastructure in place to support this.

Staffing

- 3.6. Last season, AC Goatham and Son employed in the order of 1150 staff across all of their farms and sites. Of this there are some 450 full-time equivalent staff across the business with the rest being made up of the seasonal labour required to plant and thin trees as well as harvest and pack the apple and pear crops grown across the business. Given the recognised shortfall in labour, the ability to provide workers accommodation on site provides an attractive employment prospect which is needed to attract and retain staff, whilst importantly being needed to meet the functional needs of the business.
- 3.7. The same principle applies for management positions across the site. The ability to provide workers accommodation means the business can retain and attract good staff at all levels. To assist with this, given the long and unpredictable hours associated with the work together with the 'supply and demand' curve it can be difficult to retain staff as the business needs to be able to provide attractive packages.

4. Planning History

- 4.1. In January 2019 Prior Notification (ref: **20181247**) was submitted and it was deemed Prior Approval was not required for the erection of an agricultural building at the holding, with associated hard standing, to store machinery and equipment required to serve the holding. This was approved as there were no other buildings to provide secure weatherproof storage. This building has subsequently been erected.
- 4.2. Following this, a new access track and upgrading of an existing access on to Lower Road with associated gates and fencing was approved with reference **20190164** in April 2019 in order to bring any agricultural traffic away from the residential properties at Green Farm Lane. This too has also been provided on the site.
- 4.3. In 2020 a certificate of lawfulness was issued on 22 July 2020 for six caravans for seasonal agricultural workers, with reference **20200457**. These caravans serve some of the labour requirements on the site.
- 4.4. On 14 May 2021 planning permission was granted for the over winter storage of these mobile homes in situ plus all associated operational development needed to provide hardstanding and a sewage treatment plant with reference **20210275**.
- 4.5. In 2021 planning permission was refused for the erection of a 4-bedroom detached dwelling to provide accommodation for the farm manager and their family, with associated landscaping, biodiversity enhancements and drainage infrastructure. This has reference **20210970**. This decision was appealed in 2024, with the appeal dismissed, although the Inspector recognized the functional need for the dwelling.
- 4.6. A further application for the construction of an agricultural worker dwelling, including the provision of all associated landscaping, biodiversity enhancements and drainage infrastructure was refused on 13 February 2023 (ref: **20221334**).
- 4.7. Most recently, Prior Approval was sought for the erection of a cold store at New Green Farm under reference **2240020**. Determined on the 29th of January 2024, Gravesham Borough Council concluded that Prior Approval was not required for the development.

5. Proposal

- 5.1. This application seeks full planning permission to erect a larger cold store than that granted under prior approval with reference 2240020. The cold store building as approved was designed to store 3,175 apple bins, however, as detailed within this Statement the fruit crop to be produced at this site will require a significantly larger building, with the cold store now proposed being able to store 14,145 apple bins to meet this need.

Amount

- 5.2. The proposed agricultural building that will be used for cold and controlled atmospheric storage measures 48.225 metres wide, 68.2 metres long, 10.95 metres at eaves and 14 metres to the ridge. This provides 3,289 square metres of floor space.
- 5.3. An electrical control room providing 35.68 square metres of floor space and electricity substation measuring 10.38 square metres is also proposed. To the south two chiller units on a 150 square metre pad of concrete are also proposed.

Layout

- 5.4. The building is proposed to the south of the existing farmyard and building as well as seasonal agricultural workers accommodation. The building will be orientated in a north to south axis. This is shown in the proposed block plan extract overleaf at **Figure 2**.

Landscaping

- 5.5. As full planning permission is sought for the enlarged cold store, the proposal must satisfy mandatory Biodiversity Net Gain (BNG) regulations. Introduced in February 2024, BNG outlines the Government's new approach to development. It makes sure that habitats for wildlife are left in a measurably better state than they were before the development, developers must now provide a 10% increase to the wildlife 'value' of a site. In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).
- 5.6. Submitted alongside this statement, the BNG Assessment outlines how a 14.33% improvement to the biodiversity value of the land can be achieved, through the enhancement on land immediately adjacent to the proposed cold store. This is discussed further in **Section 8**.

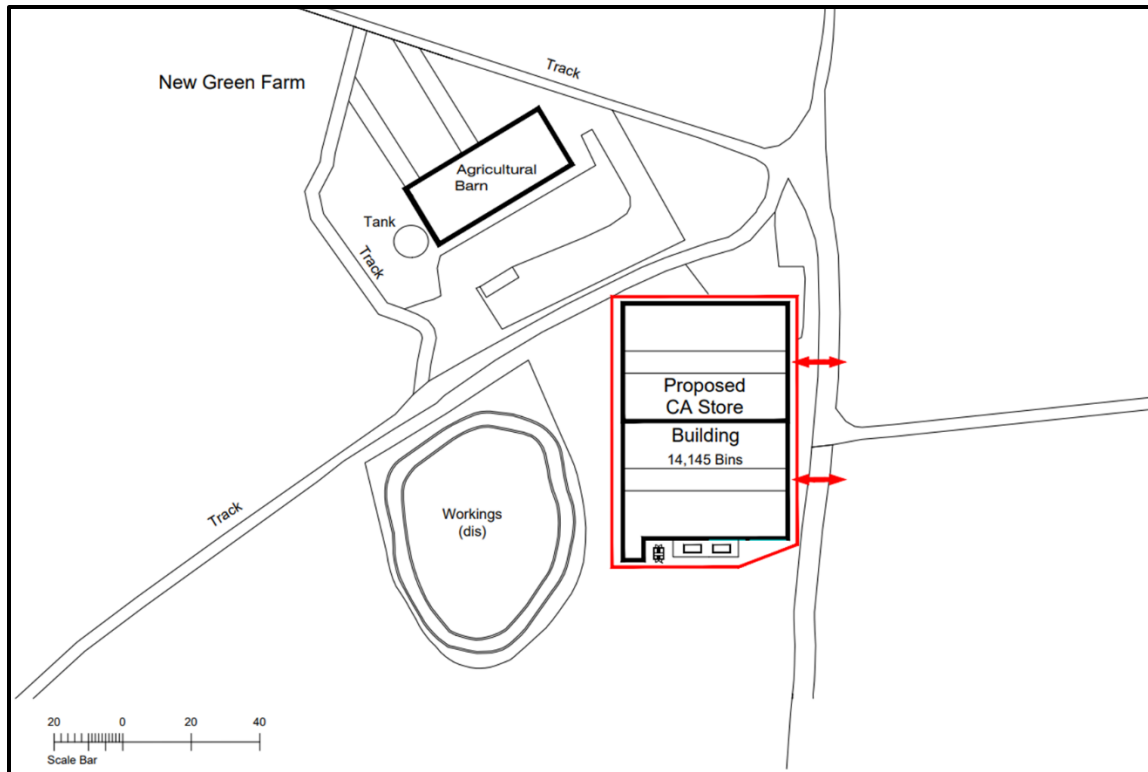


Figure 2 – Proposed Block Plan.

Appearance

- 5.7. The proposed agricultural building will be clad in green profile metal sheeting with a grey profile metal roof. No additional hardstanding is required as the existing access and yard area will provide adequate access to the building in all weathers.

Access

- 5.8. The proposal site can be accessed from Lower Road via the internal network of agricultural access tracks at the holding. This access arrangement is well established and consequently no alterations are proposed as part of this application.

6. Planning Policy Considerations

- 6.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the local development plan unless material considerations indicate otherwise. The proposal for the erection of an extended cold store has been considered in accordance with the NPPF, as well as local policies in the Gravesham Local Plan Core Strategy (2014), along with any supplementary planning documents. The relevant policies are listed and considered below.

National Planning Policy Framework

- 6.2. The most recent iteration of the NPPF was revised and adopted in February 2025. At the heart of the framework there is an assumption in favour of sustainable development. Paragraph 8 highlights three overarching objectives to achieve sustainable development that must be considered:

- a) ***An economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) ***A social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- c) ***An environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'*

- 6.3. Paragraph 11 insists on the approval of *'development proposals that accord with an up-to-date development plan without delay.'* At a strategic level, Paragraph 20 of the NPPF details that policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for development. Footnote 13 clarifies this to be *'in line with the presumption in favour of sustainable development'*.

- 6.4. As well as this, paragraph 39 of the NPPF states that *'Local planning authorities should approach decisions on proposed development in a positive and creative way... Decision-makers at every level should seek to approve applications for sustainable development where possible'*.
- 6.5. Paragraph 57 advises further that planning conditions should be kept to a minimum and only imposed where they are absolutely necessary. This means that permission should be granted unless any adverse impacts of doing so would significantly outweigh the benefits.
- 6.6. The proposed development will provide much needed secure storage to support New Green Farm and the applicant's expanding agricultural enterprise, helping with their aim to provide British apples and pears to the British Consumer. It therefore supports the local and national economy.
- 6.7. The extended cold store would provide the floor space to store 14,145 apple bins, considerably more than the 3,175 apple bins previously approved and meeting the current need of the holding. The economic benefits of the scheme are therefore considered to be substantial.
- 6.8. Paragraph 88 of the NPPF refers to supporting a prosperous rural economy. Paragraph 88 states *'Planning policies and decisions should enable:*
- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;*
 - b) the development and diversification of agricultural and other land-based rural businesses;'*
- 6.9. At paragraph 96 (c) it is acknowledged that decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lives through *'the provision of safe and accessible green infrastructure, sports facilities, local shops and access to healthier food.'* The proposal would therefore result in significant social benefits, facilitating the expansion and growth of an apple and pear grower, encouraging healthier living and the consumption of healthier food.

- 6.10. Proposals for development should ensure that safe and suitable access to the site can be achieved for all future users. Paragraph 115 outlines this, also adding that sustainable transport modes should be prioritised, to ensure that any impacts of the development on the transport network are effectively mitigated.
- 6.11. Good design is a key aspect of sustainable development. Paragraph 135 of the NPPF details that planning policies and decisions should ensure developments:
- a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - c) Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change;*
 - d) Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
 - e) Optimise the potential of the site to accommodate and sustain an appropriate amount of mix of development and support local facilities and transport networks; and*
 - f) Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'*
- 6.12. Section 13 discusses protecting Green Belt land. Within this policy it is outlined that while the essential characteristics of Green Belts such as their openness and their permanence (paragraph 142) should be protected, buildings for agriculture and forestry are classified as exceptional forms of development that are acceptable (paragraph 154).

- 6.13. Recognition of the wider benefits of trees in the form of *‘natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland’* is acknowledged at paragraph 187 of the NPPF. The proposal enables such support, as they require secure storage and work area associated with the business can ensure not only a managed landscape, but most importantly, a landscape which can be managed in a viable way – without which, management would not occur.
- 6.14. This therefore means that there would be environmental benefits resulting from the proposal. As such, it is considered that all three objectives of sustainable development have been considered, and as there would be economic, social and environmental benefits resulting from the proposal, the scheme is in accordance with policies in the NPPF and should be approved.

Gravesham Local Plan Core Strategy

- 6.15. The relevant policies contained within the Core Strategy are considered to be:
- CS01: Sustainable Development
 - CS02: Scale and Distribution of Development
 - CS07: Economy, Employment and Skills
 - CS11: Transport
 - CS19: Development and Design Principles
- 6.16. Policy CS01 considers the way in which development can be delivered in Gravesham in a sustainable manner, in accordance with the NPPF (paragraph 8), outlining that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained within the NPPF. Proposals will be approved wherever possible, where they *‘secure development that improves the economic, social and environmental conditions in the area’*. The proposal has already been demonstrated to form a sustainable form of development, due to the extensive benefits that will result from development. In this respect, Policy CS01 has been satisfied.

- 6.17. In order to meet the current and the future economic, social and environmental needs to achieve sustainable development in Gravesham, further development is required within the Borough. Policy CS02 underlines the scale and distribution of this development, designing a development strategy for Gravesham. Under this policy it is outlined that applications 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 this plan.'* A proposal to extend a cold store on an established fruit growing site is considered to satisfy this and therefore Policy CS02.
- 6.18. This is further discussed within Policy CS07, which highlights that Gravesham Borough Council will *'support proposals that promote the appropriate expansion and diversification of the rural area economy'*. Provided it would be compatible with national planning policies for protecting the Green Belt, schemes will be supported which incorporate the conversion/erection of rural buildings for rural employment use.
- 6.19. Policy CS11 considers the effect of development proposals on the transport network, in accordance with the NPPF (paragraph 115). New developments should mitigate their impact on the highway and public transport networks as required, with transport assessments and travel plans provided if required. A transport assessment is not provided alongside this planning statement, as is discussed within **Section 8** of this statement.
- 6.20. Good design is a key aspect of sustainable development, in accordance with Paragraph 135 of the NPPF. This is also considered within Policy CS19 of the Gravesham Local Plan Core Strategy. Here it is discussed that new development must be visually attractive, fit for purpose and locally distinctive. *'The design and construction of new development will incorporate sustainable construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change'*. This will be achieved through the following criteria:
- *New development will be located, designed and constructed to avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution.*
 - *New development will include details of appropriate hard and soft landscaping.*
 - *New development will protect and, where opportunities arise, enhance biodiversity and the Borough's Green Infrastructure network. Support will be given to environmental enhancements where opportunities arise.*

- *The design and layout of new development will take advantage of opportunities to build in resilience to the effects of climate change.*

6.21. The proposal is considered to satisfy all of the aforementioned criteria, located in a position already approved by Gravesham Borough Council, with sufficient ecological enhancements proposed to ensure that the proposal would result in a 14.33% improvement to the biodiversity 'value' of the land.

7. Justification

General Industry Overview

- 7.1. The vast majority of top fruit handled in Kent and the UK, perhaps in the order of 75%, is done so by a small number of companies. This includes AC Goatham and Son. These businesses have all had to adapt their growing techniques in recent years to replant orchards on new rootstocks at closer densities. This is to meet the demands of their customers (the supermarkets) who in turn are seeking to meet the demands of the general public (the consumer) for an increased volume of home-grown apples and pears, whilst maintaining an affordable pricing structure. As well as increasing volume by planting at higher densities, orchards are being replaced with higher yielding clones, whilst the introduction of wire networks encourages fruit growth upwards to better utilise space and allow fruit to be picked at two levels (top and bottom – the latter being done with specialist picking platforms). Again, increasing volume of production per tree.
- 7.2. As a consequence, low yielding orchards (even if they are relatively young in the lifecycle of a fruit tree) are quickly becoming unsuitable and require replacement with more modern, higher yielding stock. To ensure orchards perform at their optimum they need to be closely monitored and suitable action taken depending on weather patterns to optimize yields, but also fruit size.
- 7.3. Monitoring fruit size is critical, as this dictates whether contracts continue or not as customers require specific fruit sizes for optimum prices. It is therefore imperative that the business can monitor water application, thinning, pruning, harvesting and disease in each tree to optimize its growing ability. This is extremely time-consuming and is wholly weather dependent so requires last minute decision making to be done.
- 7.4. Similarly, consumer trends in variety preference have meant planting different varieties such as Gala from those previously favoured e.g. Russets and Cox. This has seen growers replacing orchards that have again not necessarily served a full life cycle in order to maintain contracts and meet the changing needs of the consumer. A recent example would be the Braeburn apple, which 5 – 10 years ago was understood to make up circa 20% of the demand from supermarkets. Today, this is believed to have reduced to about 5%, as varieties such as Gala which have a sweeter but comparably crunchy bite are favourable.

- 7.5. This then means there is a surplus requirement of Braeburn stock on the market which in turn drives the price of the product down and therefore its viability. So, growers are either faced with the decision of continuing to grow into a market which has an over surplus (which in reality means continuing in an unviable manner) or grubbing orchards and replacing them with varieties which are highly in demand and which are forecast to stay.
- 7.6. The size, shape and colour of apples is also increasingly important to consumers and specific “grading” demands are put on growers by the supermarkets to grow particular classes of fruit; with optimum classes (e.g. Class I) commanding higher prices. Again, this puts added pressure on growers to, as far as possible, control the growth of apples on the trees. One of the main ways of doing this is by controlling the level of water that can be available to a tree at certain times of the year and to achieve this, modern orchards require drip feed irrigation systems to be installed. Notwithstanding cost, this puts added pressure on the businesses’ labour to install these systems and to closely monitor them.
- 7.7. Another way of controlling the growth of apples on the trees is to significantly increase labour levels in an orchard to thin trees more regularly and “train” fruit on the wires and to ensure orchards are harvested at optimum times. This improves the grading level of the end product but obviously comes with increased levels of labour demand and cost. Those businesses not giving such attention to their orchards are not being favoured by the supermarkets as the end product is not consistent (which is what ultimately sells with the consumer), and it therefore becomes increasingly difficult to service and maintain supply contracts. Understandably, this puts added pressure on the applicant for the requirement for additional labour.
- 7.8. The development of rootstocks, planting at closer densities and using wire networks all mean that yields per hectare are considerably higher than they used to be. However, more trees not only mean there is more stock to plant, thin and harvest (which means more labour), harvest volumes per hectare increase which mean the need for infrastructure to support this consequentially increases. This applies to:
- Workers accommodation (where the industry norm is the provision of accommodation for the seasonal period to attract workers);
 - The number of fruit bins;
 - The extent of buildings to store increased levels of equipment;

- The extent of cold storage;
- The extent of onsite water storage facilities and irrigation systems; and
- The extent of grading and packing facilities (and areas associated with storage of packaging).

The Fruit Growing Season

- 7.9. Typically, the fruit growing season commences after harvest period – which is usually completed by the end of November – and will begin with the removal of old/dead or dying trees and their subsequent replacement with new stock through till early February.
- 7.10. The labour requirement during the planting season is high for a couple of months, especially during the early years when trees are being closely monitored to ascertain whether they are taking to their new environment.
- 7.11. Across the business, when new orchards are planted, the opportunity to incorporate the latest technology in drip feed irrigation is now taken; whilst the trees are now planted on a wire network to optimise growth and increase yields.
- 7.12. Pruning will occur post-harvest through to the end of March. The main spraying cycle then commences from March through to the end of June as does the preparatory work in anticipation of the harvest period commencing in June and ending in November. This can include thinning but also the reinforcement and repair of wire networks.
- 7.13. The harvest period has the greatest labour requirement though the fruit season and it is during this time from May/June to the end of November that staffing levels will be at their highest both on the farms and in packhouse.

Home Grown Produce

On the 30th October 2023, DEFRA released and updated their 2022 Horticultural Statistics. Although it is appreciated that this covers various sectors of the horticultural industry, certain elements expressly relate to the topfruit industry. In the report it can be identified that home produced fruit has risen in value from its 2022 figure to £1 billion, an increase of 9.5% compared to 2021, with production volumes also rising by 13% to 652,000 tonnes. This is shown on the graphs at **Figure 3** below.

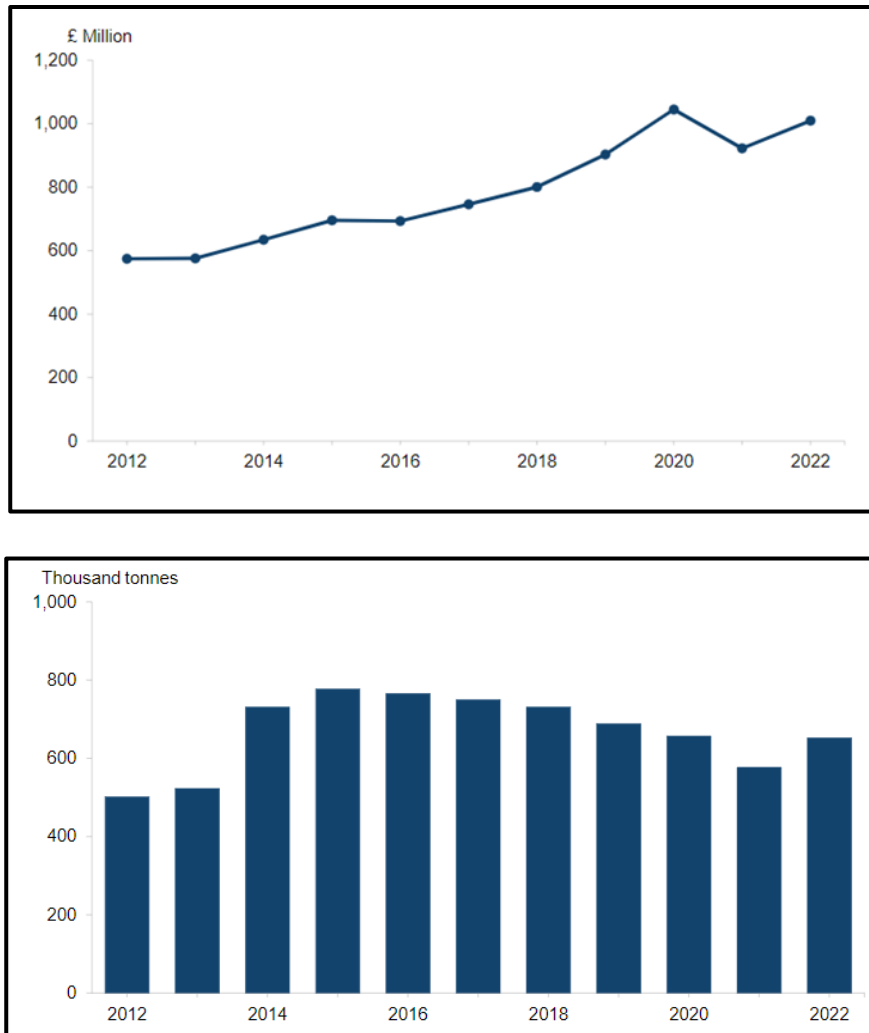


Figure 3 – Graphs taken from the Horticultural Statistics released on 30th October 2023.

- 7.14. DEFRA's 2023 report observed that "The value of orchard fruit increased by 31% to £377m and soft fruit decreasing by 1.1% to £574m. The value of dessert apples increased by £28m to £183m in 2022, a 18% increase on 2021. The value of culinary apples more than doubled in 2022 to £94 million, with market prices increasing by 40% to £1.77/kg and yields increasing by 38% to 49 t/ha.
- 7.15. The report also highlights "The area planted for Cox apples continues to diminish at 715 thousand hectares, 14% lower than 2021 (835 thousand hectares) and 64% lower than the area planted in 2010 (1,993 thousand hectares). Cox orchards continue to be grubbed as consumer demand decreases, which along with the lower potential yield when compared to the newer varieties (e.g. Gala, Braeburn) means the area is expected to continue to decline in future years."

- 7.16. When commenting upon the growing year, the report confirms that *“Dry weather at the start of the year gave growers the ability to raise polytunnels for soft fruit early and soil conditions were good for planting strawberries, raspberries and orchards. Though some damage to tunnels occurred with the Dudley, Eunice, and Franklin storms in February. Unusual hot days in March and April brought the season forward for both top and soft fruit crops but it left them vulnerable to the late frosts in April which caused some damage. Harvesting of all fruit crops started early due to the continuing effects of the mild spring and the summer heatwave.”*
- 7.17. Fruit exports (including re-exports) were worth £64 million in 2022, a 2.3% increase from 2021. Volumes of exports rose by 1.7% to 38 thousand tonnes (following the fall of 66% to 37 thousand tonnes in 2021, from 121 thousand tonnes in 2020).

British Grower Association Survey

- 7.18. The British Grower Association surveyed members of the British Apples & Pears Limited (BAPL) in the latter part of 2022. This survey has revealed a major retreat in future orchard investment given the state of poor returns within the industry. This has an inherent impact upon the ability to provide home grown top fruit to the consumer. The survey was considered to represent an estimated 80% of the British top fruit growers, thus offering a trusted and thorough industry analysis. The report indicates that 150,000 new apple and pear trees have been cancelled for planting this season, with the original intention of investments for 480,000 new trees in orchards being cut.
- 7.19. The lack of planned ongoing investment is related to the lack of returns from the supermarkets. British Apples & Pears Limited executive chair Ali Capper explained that *“The key reason for the lack of investment is supermarket returns that are unsustainable. Increased input costs of around 23%, for example for picking, energy, haulage and packaging, are being met with almost static average fruit prices paid by retailers.”*
- 7.20. The average year on year increase in what supermarkets should pay the growers for their fruit has been recommended as 12% by an independent report by John Pelham for Andersons Consulting. The actual increase received by growers was 0.8%. When comparing input costs increases of around 23% by the average increase of payment to growers by the supermarket of 0.8%, the significant shortfall of return is immediately apparent.

- 7.21. The executive chair Ali Capper of British Apples & Pears Limited as part of the report states *“This is the clearest indication yet that the future of apple and pear growing in the UK is seriously in doubt. The industry is on a knife edge. Without long term investment and new tree planting, orchards will quickly go into decline. That’s not something any of us wants, least of all the British consumer.”*
- 7.22. Alongside the dire figures demonstrating the industry grower crisis, the report sets out a number of key asks for different stakeholders; namely the government, retailers and consumers. These ‘asks’ are set out at **Figure 4** below. These ‘asks’ as well the growers survey highlight the pressures upon the top fruit industry and how drastic change and support is needed to ensure its survival. This support is needed from the top, with planning policy and decision making able to be at the forefront of this.

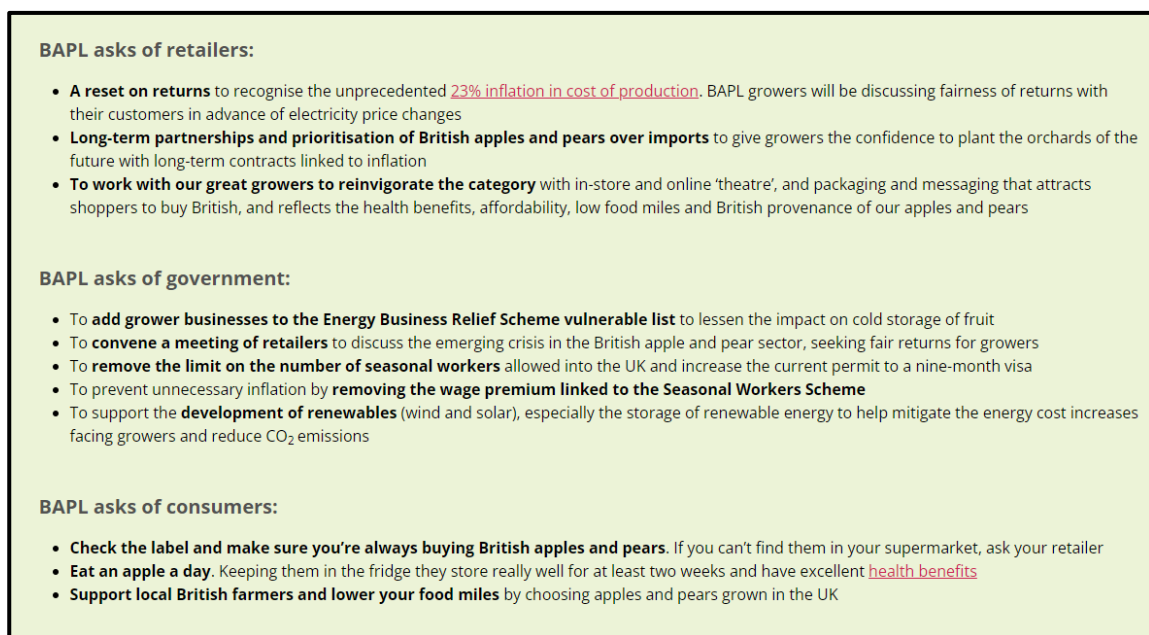


Figure 4 – British Apples and Pears Limited ‘asks’.

AC Goatham & Son’s Partnership with Aldi

- 7.23. As previously alluded to, AC Goatham & Son signed a 20-year deal with supermarket chain Aldi in 2024, cementing an existing relationship which has seen the company provide apples and pears to Aldi since 2016. This 20-year deal represents investment in British farming, with huge implications nationally.

- 7.24. Part of this agreement will see the introduction of the 'Aldi Orchard', a 200-acre plot on New Green Farm. Growing a mix of Gala and Braeburn apples, AC Goatham and Son have also agreed to plant an additional 100 acres per year of apple trees exclusively for the supermarket.
- 7.25. This proposed 200-acre site is estimated to grow more than 20 million apples and pears each year, with the busy harvest lasting as long as six weeks. Given the increased work that this partnership will produce, it is imperative that New Green Farm has improved labour resources and infrastructure in place to support this. While permission has been granted for a cold store with a capacity of 3,175 apple bins, the extended cold store can store 14,145 apple bins, considerably more than the approved cold store under permission 20240020 but required to meet the current forecast yields for the holding.

8. Other Material Considerations

Principal of Development

- 8.1. As permission has been granted for the erection of the cold store under a Prior Approval application referenced 20240020, the principal for the cold store has been established. However, the approved cold store provided the space for 3,175 apple bins only.
- 8.2. Given that a 200 acre 'Aldi Orchard' is due to be planted at New Green Farm, with an additional 100 acres of orchard due to be planted every year for the next 20 years, a much larger cold store is required. The proposed extension to the cold store will allow for an additional 10,970 apple bins to be stored. Given the need for the infrastructure and staffing at New Green Farm to increase at the same level as the farm itself, the extended cold store is absolutely necessary to the continued use of the site, providing 14,145 apple pins for the farm.

Transport and Highways Impact

- 8.3. New Green Farm is well connected to the surrounding road network, with access to the application site possible from Lower Road to the north, Green Farm Lane to the west and Taylors Lane to the east.
- 8.4. While there is a farm building currently in situ to the north-west of the proposed extended cold store, this is used for the storage of farm equipment and is therefore considered to be insufficient for the 200-acre orchard that is proposed as a result of AC Goatham & Son's partnership with Aldi.
- 8.5. This therefore means that at harvest, fruit currently needs collating into the main yard area before then being transported out by HGV's across various sites to stores across Kent, although these are insufficient and in short supply. This is recognised as being unsustainable as well as having the added effect of concentrating movements into a much shorter period.
- 8.6. Furthermore, the need is to get fruit into store soonest after harvest, so it is not unusual for vehicles to currently leave New Green Farm whilst not at full capacity. The proposal allows the fruit to be put in store straight away, and when it is eventually needed, it can be taken from stores in much more efficient loads.

- 8.7. With the extended cold store at the site, it is recognised that there would be added gains of not only improving the sustainability of operations, but disbursing the traffic movements throughout the year. In highway terms, this development would not have a material impact upon the safety and operation of the adjoining highway network, let alone be 'severe' or generate 'significant movements' to warrant refusal as per the local and national policy. Consequently, it is concluded that the proposal would be entirely acceptable on transport and highway grounds.
- 8.8. As such, it is duly considered that the proposal would not give rise to any adverse transport impacts or the safety and convenience of the nearby highway. It is our view therefore that this is in accordance with Section 4 of the NPPF; Promoting Sustainable Transport and the relevant policies of the local plan.

Noise Impact

- 8.9. In order to ensure that the proposed development would not impact upon any neighbours to New Green Farm, any residents of neighbouring caravans, or existing agricultural activities on the land, a Noise Assessment has been published to accompany the scheme. Undertaken by WSP, the Noise Management Plan concludes that *'On balance, it is considered that the potential for noise impact from the proposed development would be low and acceptable in planning terms'*.
- 8.10. It is acknowledged in the Noise Assessment that while there is some uncertainty with respect to the background sound levels utilised in the assessment, *'this element of uncertainty would not change the conclusions of the report'*.
- 8.11. All significant noise sources proposed with the development have been appropriately assessed, the Noise Assessment indicates that noise will not comprise an adverse impact to the occupiers of the neighbouring residential caravans or nearby dwellings. As such, with regard to the noise impact of development, the proposal is acceptable.

Flood Risk

- 8.12. Having Reviewed the Environment Agency's Flood Map for Planning, it is clear that the application site is at very low risk of flooding from both surface water and rivers and the seas, as detailed at **Figure 5** below.

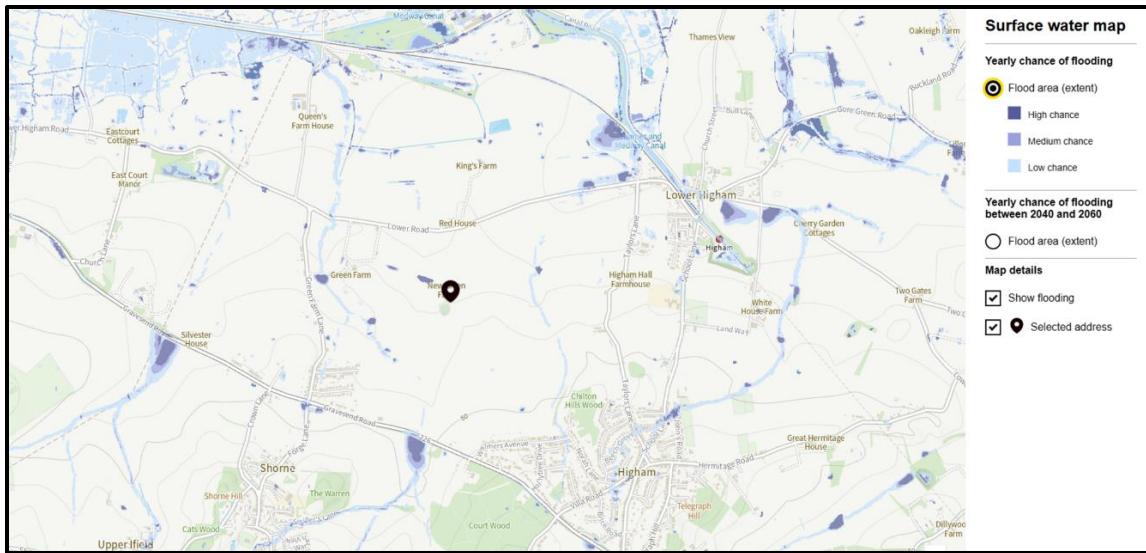


Figure 5 - Flood map extract from the Environment Agency.

- 8.13. The application site is currently an unused field, soft-landscaped, and surrounded by existing agricultural tracks and an established farmyard, comprising of an agricultural storage building, concrete yard area and the provision of up to six mobile homes. The proposal seeks permission to extend an approved cold store, which is not considered to increase the flood risk on the site.

Ecology

- 8.14. Greenspace Ecological Solutions were instructed to undertake a Preliminary Ecological Appraisal (PEA) and a Biodiversity Net Gain (BNG) Assessment, in support of the proposal. These documents were published in January and February 2025, and are submitted alongside this planning statement, ultimately concluding that development at the site is *'unlikely to impact designated sites, areas of ancient woodland or Habitats of Principal Importance.'* Moreover, no evidence of any protected species were recorded, such as badgers.
- 8.15. Introduced in February 2024, BNG outlines the Government's new approach to development. It makes sure that habitats for wildlife are left in a measurably better state than they were before the development, developers must now provide a 10% increase to the wildlife 'value' of a site. In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

- 8.16. The BNG Assessment accompanies this application, outlining that a net gain of 0.14 habitat units (14.33%) can be achieved through the enhancement of off-site cropland immediately adjacent to the site, as is shown at **Figure 6** overleaf. This is far greater than the mandatory 10% improvement proposals are expected to provide.
- 8.17. Furthermore, as well as the ecological planting enhancements proposed, the PEA also suggests recommendations to further increase the value of the site. These measures include:
- The installation of 2 x bird boxes within the proposed building.
 - Incorporation of a wildlife-friendly planting scheme.
 - Native tree planting.
 - The incorporation of an invertebrate feature.
- 8.18. The applicant has agreed to these suggested measures.



Figure 6 – The Off-site Proposed Habitats Plan.

9. Conclusion

- 9.1. This application seeks planning consent for the extension of a cold store for the controlled atmospheric storage of top fruit at New Green Farm, Lower Road, Shorne, Kent, which obtained permission for its erection under a Prior Approval application, referenced 20240020.
- 9.2. The proposal has been drafted with regards to the provisions and policies of the National Planning Policy Framework, as well as local policies gathered from the Gravesham Local Plan Core Strategy (2014), along with any supplementary planning documents.
- 9.3. The scheme follows the 20-year partnership between AC Goatham & Son Ltd and Aldi, signed in 2024, ensuring the fruit grower are Aldi's sole apple and pear supplier in the UK. Part of this partnership included a 200-acre 'Aldi Orchard', to be provided at New Green Farm. In order to better support this orchard, sufficient infrastructure must be provided. The extended cold store includes the provision to store 14,145 apple bins, significantly more than the 3,175 apple bins granted by virtue of permission 20240020.
- 9.4. The proposal accords with both national and local planning policy, also satisfying mandatory Biodiversity Net Gain regulations. As the proposal is considered to be a sustainable form of development, permission should be granted.
- 9.5. It is therefore respectfully requested that the application is approved under delegated powers.