



Delegated Report

Full Planning Application

Planning Application No:	20250643
Location:	New Green Farm Lower Road Shorne Gravesend
Description:	Erection of a cold store building.
Applicant:	A C Goatham & Son Ltd
Site Visit Date:	8 October 2025

Submitted Documents/Plans

Application form
Supporting Planning Statement
Preliminary Ecological Appraisal (J24-021686, 29 January 2025)
Noise Assessment (Ref. 70093653, June 2025)
Biodiversity Gain Plan (Ref: J24-021686_BGP, 20 February 2025)
Drawing no. ACG&S-NGF-900 Rev. C (Location Plan)
Drawing no. ACG&S-NGF-901 Rev. C (Existing Block Plan)
Drawing no. ACG&S-NGF-902 Rev. E (Proposed Block Plan)
Drawing no. ACG&S-NGF-904 Rev. E (Proposed Floor Plan and Section)
Drawing no. ACG&S-NGF-905 Rev. E (Proposed External Elevations)
Drawing no. ACG&S-NGF-910 (Services and Plant Plan)
Drawing no. 072 Rev. B (Site Section B-B)
Landscape and Visual Appraisal (July 2025)
Appendix 1 Landscape and Visual Appraisal
Drawing no. HBA-967-001 Rev. C (Landscape Strategy)
Landscape and Visual Appraisal Figures
Drainage & SUDs Strategy (September 2025)

Supplementary Information:

Viewpoint 03 (Existing and Proposed)
Viewpoint 05 (Existing and Proposed)
Viewpoint 06 (Existing and Proposed)

Superseded:

~~Drawing no. ACG&S-NGF-900 (Location Plan)~~
~~Drawing no. ACG&S-NGF-901 (Existing Block Plan)~~
~~Drawing no. ACG&S-NGF-902 (Proposed Block Plan)~~
~~Drawing no. ACG&S-NGF-904 (Proposed Floor Plan and Section)~~
~~Drawing no. ACG&S-NGF-905 (Proposed External Elevations)~~
~~Drawing no. 072 Rev. A (Site Section B-B)~~
~~Drawing no. ACG241/10/03 (Elevations)~~

Relevant Planning History

Reference	Description	Decision	Decision Date
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20240812	Erection of agricultural workers dwelling for the farm's manager, including the provision of all associated landscaping, biodiversity enhancements and drainage infrastructure.	Permitted	29.07.2025
20240020	Determination as to whether prior approval is required for the erection of a cold store.	Approval Granted	29.01.2024
20210970	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.	Refused Appeal Dismissed	26.09.2022 28.02.2024
20210275	Application for change of use of land for the over winter storage of caravans and the provision of associated operational development following the approval of the Certificate of Lawfulness 20200457.	Permitted	14.05.2021
20200457	Application for a Lawful Development Certificate in respect of the proposal of six caravans for seasonal agricultural workers	Certificate Granted	22.07.2020
20190164	Construction of an aggregate access track and upgrading of the existing access to create a concrete bell mouth, with associated gates and fencing.	Permitted	10.04.2019
20181247	Determination as to whether prior approval is required for the erection of a new agricultural building to provide storage for machinery and farm equipment.	Not Required	02.01.2019

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS07 – Economy, Employment and Skills
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Design and Development Principle

Gravesham Local Plan: First Review (1994)

- T1 – Impact of Development on Highway Network
- T5 – Access to the Identified Highway Network
- P3 – Vehicle Parking Standards

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving sustainable development
- Section 4 – Decision-making
- Section 6 – Building a strong, competitive economy

- Section 9 – Promoting sustainable transport
- Section 12 – Achieving well-designed places
- Section 13 – Protecting Green Belt land
- Section 15 – Conserving and enhancing the natural environment

Supplementary Planning Guidance

- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)
- Gravesham Landscape Character Assessment (2009)
- Planning Practice Guidance (PPG) Green Belt (2025)

Consultations, Publicity and Representations

External Consultees

Dickens Country Protection Society

The Society would wish to object to the proposed building, mainly because of its size and siting, which would have a major impact on the openness of the Green Belt and be visually intrusive in the area. The operation of the facility is likely to cause noise and disturbance in the area.

KCC Biodiversity

SUMMARY – NO FURTHER INFORMATION REQUESTED

We have reviewed the ecological information submitted in support of this application and advise that no further information is requested from the applicant prior to determination of the planning application.

ECOLOGICAL CONSTRAINTS AND MITIGATIONS

The submitted Preliminary Ecological Appraisal (Greenspace Ecological Solutions, January 2025) provides a good overview of the site. No further ecological surveys are deemed necessary. A precautionary approach is recommended in section 6.4 of the report for badgers, reptiles and nesting birds. Other protected/priority species are reasonably scoped out. A CEMP condition is recommended as follows:

CEMP: No development shall be undertaken (including any site and/or vegetation clearance) until a Construction Environmental Management Plan (CEMP) which contains full details of the measures outlined in section 6.4 of the Preliminary Ecological Appraisal (Greenspace Ecological Solutions, January 2025) has been submitted to and approved in writing by the local planning authority. The CEMP shall be based on up-to-date ecological survey information, as advised by a suitably qualified ecologist and include the following:

- a) Retained tree and hedgerow protection measures in accordance with BS 5837:2012;
- b) Specific measures (which may be presented as a series of method statements) to avoid impacts to badgers, reptiles and nesting birds;
- c) The role and responsibilities of an Ecological Clerk of Works (ECoW) or similarly competent person(s); and
- d) Copies of any protected species mitigation licences issued by Natural England as required.

The approved CEMP shall be adhered to and implemented throughout the construction period in accordance with the approved details.

Reason: To protect biodiversity in accordance with the NPPF paragraph 193 and Local Policy CS12, to avoid an offence under the Wildlife and Countryside Act 1981 (as amended) and with consideration for Species of Principal Importance under the Natural Environment and Rural Communities Act 2006.

BIODIVERSITY NET GAIN (BNG)

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications received in England (with a few exemptions) must deliver at least a 10% biodiversity net gain (BNG) from April 2nd 2024. Where required, the Statutory Biodiversity Metric will need to be used to

demonstrate a minimum 10% biodiversity net gain. Local policy may request a higher level of net gain. Significant gains will need to be secured for at least 30 years.

Biodiversity net gain is a statutory requirement of this proposed development. References to the biodiversity value of any habitat or habitat enhancement are to its value as calculated in accordance with the biodiversity metric.

The submitted Statutory Biodiversity Metric (Greenspace Ecological Solutions, February 2025) describes the application site as 0.42ha of cereal cropland and modified grassland/ruderal vegetation. These are all low distinctiveness habitats. The proposed development will result in the total loss of onsite habitats. As compensation, the applicant proposes the offsite enhancement of 0.59ha of arable field margins to 'Arable field margins pollen and nectar' (UKHab code c1a6; simply field margins sown with nectar-rich wildflowers). This offsite enhancement will deliver 14.33% biodiversity gains.

Offsite biodiversity gains must be registered and allocated prior to commencement of any development: Register a biodiversity site and allocate to a development - GOV.UK

This must be evidenced when the 'deemed' condition of BNG is discharged, as per Schedule 7A 13(1) of the Town and Country Planning Act 1990. The condition is that the development may not be begun unless—

- (a) a biodiversity gain plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

The condition cannot be varied or removed. An application must be made to discharge it as any other condition. We recommend it is referred to in decision notices in the form of an informative. The government's published Biodiversity Gain Plan (BGP) template should be used to discharge it: Biodiversity gain plan - GOV.UK. Please note that the submission of the finalised Statutory Biodiversity Metric/BGP is required by law prior to the commencement of any development.

SECURING OFFSITE BIODIVERSITY GAINS

Offsite biodiversity gains must be secured via S106 agreement or conservation covenant. The applicant will otherwise be unable to register the biodiversity gain site. See: Enter a legal agreement for biodiversity net gain - GOV.UK

A Habitat Management and Monitoring Plan (HMMP) will be required to register the offsite biodiversity gains. This can be secured as part of the legal agreement and should contain:

- (a) a non-technical summary;
- (b) the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- (c) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
- (d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development;
- and
- (e) the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority.

A monitoring fee should be secured as these biodiversity gains will need to be subject to monitoring reports across 30 years, which will need to be reviewed (and acted upon as necessary) by the LPA at their own cost. We provide details of suggested monitoring fees in our March 2025 advice note 'KCC Ecological Advice Service suggested BNG Monitoring Fees' which has been distributed to all LPAs in Kent.

KCC Flood and Water Management – 22 July 2025

Unfortunately, no surface water drainage strategy has been provided for the proposed development). We would therefore recommend the application is not determined until a complete surface water drainage strategy has been provided for review.

At a minimum, a drainage strategy submission must comprise:

- A location plan
- A site layout
- A drainage proposal schematic or sketch
- A clear description of key drainage features within the drainage scheme (e.g. attenuation volumes, flow control devices etc.)
- Information to support any key assumptions (e.g. impermeable areas, infiltration rates etc.)
- Supporting calculations to demonstrate the drainage system's operation and drainage model network schematic
- Drainage strategy summary form (from our Drainage and Planning Policy Statement)
- Consideration of key questions and / or local authority planning policy requirements.

Our Drainage and Planning Policy Statement sets out how Kent County Council, as Lead Local Flood Authority and statutory consultee, will review drainage strategies and surface water management provisions associated with applications for major development and should be referred to for further details about our submission requirements. This is available on request, by emailing SUDS@kent.gov.uk.

KCC Flood and Water Management – 7 October 2025

Kent County Council as Lead Local Flood Authority have reviewed the Drainage and SUDs Strategy prepared by RSPD dated September 2025 and have the following comments:

1. Whilst we have no objections to the proposed drainage in principle, we would emphasize that additional ground investigation will be required to support the use of infiltration. It is recommended that soakage tests be compliant with BRE 365, notably the requirement to fill the test pit several times. Detailed design should utilise a modified infiltrate rate and demonstrate that any soakaway will have an appropriate half drain time.
2. Further to this, within the hydraulic calculations, the applicant has used the seasonal default Cv values, we require for this to be set at 1 (given that the surface is impermeable), for the detailed design.
3. The site is in source protection zone 3. Consultation with the Environment Agency early in the planning process is recommended to identify any constraints or specific requirements in this area that may impact the proposed SuDs methods.

Should the LPA be minded to grant permission, we would recommend the following conditions attached:

Condition:

Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall be based upon the Drainage and SUDs Strategy prepared by RSPD dated September 2025. The submitted scheme shall demonstrate compliance with the required technical standards at the time of submission and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of within the curtilage of the site without increase to flood risk on or off-site.

The drainage scheme shall also demonstrate (with reference to published guidance):

- that silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters.
- appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.

The drainage scheme shall be implemented in accordance with the approved details.

Reason: To ensure the development is served by satisfactory arrangements for the disposal of surface water and to ensure that the development does not exacerbate the risk of on/off site flooding. These details and accompanying calculations are required prior to the commencement of the development as they form an intrinsic part of the proposal, the approval of which cannot be disaggregated from the carrying out of the rest of the development.

Condition:

No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved by the Local Planning Authority. The Report shall demonstrate that the drainage system constructed is consistent with that which was approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and, the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed.

Reason: To ensure that flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property and ecological systems, and to ensure that the development as constructed is compliant with and subsequently maintained pursuant to the requirements of paragraph 182 of the National Planning Policy Framework.

Condition:

Where infiltration is to be used to manage the surface water from the development hereby permitted, it will only be allowed within those parts of the site where information is submitted to demonstrate to the Local Planning Authority's satisfaction that there is no resultant unacceptable risk to controlled waters and/or ground stability. The development shall only then be carried out in accordance with the approved details.

Reason: To protect vulnerable groundwater resources and ensure compliance with the National Planning Policy Framework.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

KCC Heritage

The site lies within an area of multi-period background archaeological potential. However, based on existing Historic Environment Record data for the area and the fact that part of the site was historically one of two adjacent chalk pits, I consider it unlikely that these proposals would have a significant below-ground archaeological impact and have no further comments to make in this case.

KCC Highways

It would appear from the documentation submitted that the construction of a larger cold store would not increase the number of vehicle movements generated onto the local highway network but merely spread the total generation over a longer period. No additional staff vehicle movements would be generated.

No objection is therefore raised on highway grounds.

KCC Public Rights of Way

Access to the proposed site is via a private track leading from Lower Road, which turns eastward and continues until it intersects with Public Right of Way NS156. The proposed development site is located immediately south of this footpath.

The proposed development will result in increased vehicle movements across Footpath NS156, including large and heavy machinery. This poses a significant safety risk to pedestrians using the path. Clear and

permanent signage should be installed to indicate that NS156 is a pedestrian route, ensuring visibility and awareness for all site users and vehicle operators.

Any landscaping or shrub planting near the Public Right of Way must be set back sufficiently to allow for full growth without encroaching on the path. This is essential to maintain accessibility and prevent future obstruction.

I enclose a copy of the Public Rights of Way network maps showing the line of the path for your information.

Please note that the granting of planning permission confers no other permission or consent on the applicant. It is therefore important to advise the applicant that no works can be undertaken on a Public Right of Way without the express consent of the Highways Authority. In cases of doubt the applicant should be advised to contact this office before commencing any works that may affect the Public Right of Way. Should any temporary closures be required to ensure public safety then this office will deal on the basis that:

- The applicant pays for the administration costs.
- The duration of the closure is kept to a minimum.
- Alternative routes will be provided for the duration of the closure.
- A minimum of eight weeks' notice is required to process any applications for temporary closures.

This means that the Public Right of Way must not be stopped up, diverted, obstructed (this includes any building materials or waste generated during any of the construction phases) or the surface disturbed. There must be no encroachment on the current width, at any time now or in future and no furniture or fixtures may be erected on or across Public Rights of Way without consent.

Shorne Parish Council

The Parish Council has to **OBJECT STRONGLY** to this application.

Previous application ref 20240020 for Prior Approval of a much smaller building is noted, for which it was deemed that Prior Approval was not required. The building previously proposed however had a total built area of only 956sqm and maximum height of 12m.

The present proposal is for a total built area more than three and a half times the previous size and taller, having overall 3,595sqm of built floor area (counting in the external electricity substation and two chiller units). In addition, there is a roof overhang along both sides, and four "cat ladders" to the roof voids also increasing the total area. The maximum height will now be 14m. This completely different proposal greatly exceeds what would be reasonably expected in association with an individual small farm unit.

We question the actual need and appropriateness of the proposal for the relatively small area of land being farmed, as well as it causing adverse impact on the openness of the Green Belt and the Higham Arable Landscape Area. This is especially as the proposed building will be highly visible in the landscape, particularly from residential dwellings on higher ground close nearby.

We consider this to be a disproportionately large, near Industrial Application more suited to an Industrial Estate rather than removing high-grade agricultural land from food production.

If permitted, the application would irrevocably alter the nature of the area and could lead to proliferation of additional Industrial buildings being co-located. That aspect needs to be considered at this point in time, as the applicant had previously mentioned additional cold storage buildings and a packing plant despite those facilities already being available at the Company headquarters nearby at Flanders Farm.

Plans and documents submitted:

- No additional hardstanding is shown or suggested however it seems likely that this would be

required to ensure safe vehicle operations, this should be shown on the plans and factored into the extent of the built area being proposed.

- No additional contiguous land is shown as being farmed.
- Based on previous plans submitted for other applications, the cold store may be being located on tenanted land rather than land in the ownership of the applicant.
- It is not made clear on all the plans and extracts that Public Footpath NS156, running south-west to north-east, is immediately west of the suggested location of the cold store building and that associated vehicles will be crossing the footpath in a manner likely to result in conflict with members of the public. The KCC Public Rights of Way Team should be asked for their input unless this has already been solicited.
- We also note application Ref 20240812 for an agricultural workers dwelling (which was awaiting determination and has recently been permitted). This is not shown on the currently submitted plans or mentioned in the text of the supporting documents.

Supporting Planning Statement:

- Note this uses both Acres and Hectares (1 Acre = 0.405 Hectare) so the areas quoted are confusing: New Green Farm is stated to be 67.5 hectares owned plus 17.28 hectares tenanted, a total of 84.78 hectares.
- At the same time, it is stated that an “Aldi Orchard” of 200 Acres is to be planted “on New Green Farm”, that is 81 hectares. It is not clear whether this is additional contiguous land or double counting of existing land as the location is unclear.
- The proposed building can store 14,145 apple bins. It is also unclear why the total annual production from the farm would all need to be accommodated in long-term storage. It would not all be picked at exactly the same time and it would be expected that much would be transferred almost immediately for processing and packing then delivery to retail outlets.
- Once the apples have been placed into storage bins they could be transported and stored anywhere within a reasonable distance, hence we do not accept that there needs to be any cold storage located on the farm itself, let alone at such a massive scale.
- Immediate versus delayed transport makes no difference to the number of bins and vehicle movements that are actually required.
- In Point 8.13 the applicant states that the site is currently an unused field, however it was formerly in full arable production.

Noise assessment:

- The noise assessment has several deficiencies.
- The assessment only considers one residential location, at The Red House (incorrectly called “Kennel House” in the documents). While that is the nearest residential property it would be shielded from noise emanating from the refrigeration units/chiller fans by the building itself, however other residential properties that are only 600-700m away, and are more likely to be subjected to noise propagation, have not been considered.
- The noise level from two fans working simultaneously has been underestimated. Two 89dBA sources together produce 92dBA, possibly causing beating, and the sound would propagate further than shown including due to reflection off the rear wall of the building.
- The noise from vehicle reversing beeps can travel long distances and can be particularly intrusive for nearby residents.
- Accordingly there is concern about ambient noise levels, especially in summer and at night.

Biodiversity Gain Plan:

- Two bird boxes and an invertebrate feature are proposed, it is considered that more could be done in these respects.
- Otherwise the plans are satisfactory and welcome
- A planting plan must however also be submitted.

Other points:

- Public Footpath NS156 – There will be further adverse impact on the ambience, physical condition

and user safety of Public Footpath NS156.

- Landscaping – It is considered that more could and should be done to shield the proposed buildings from view and to soften the appearance.
- Building access routes - The noise documentation claims that the building would only be accessed from the east side however there are doors on both sides. The access route needs to be clarified and if necessary/appropriate restricted by Condition.
- Increased traffic volumes, road access routes - We are opposed to any increase in traffic to and from the site as access, especially for HGV's, along Lower Higham/Gravesend Road is not good. We disagree with the statement in Point 8.3 of the supporting Planning Statement that New Green Farm is "well connected to the surrounding road network". We particularly object to the suggestion that Green Farm Lane, which is mostly single lane and has a 7.5T weight limit, can provide access.

Other suggested "Without Prejudice" Conditions:

- Hours of working – Working hours, and therefore noise emission, should be restricted, especially in summer months.
- Safety of Public Footpath NS156 - Measures are needed to ensure the safety of users of the Public Footpath NS156 and its condition as the applicant is proposing to move further large and heavy machinery across the line of the footpath. The Footpath width (as a previous track) must be maintained and the provision of permanent safety fencing/signage should be considered.
- Vehicle movements to and from the site - Vehicle sizes, numbers and permitted access routes, especially as regards HGV's, should be limited and controlled.
- Signage and advertising banners – these should all be restricted and controlled.
- Only on-site production to be stored – The cold store should only be used to store apples grown in the contiguous New Green Farm orchards, it cannot be used to store fruit transported from another site/sites.
- Light pollution – the proposal is for an area that is presently completely dark. A detailed lighting plan needs to be submitted. Any external lighting needs to be minimal, of low light intensity and properly controlled so as to minimise nuisance and disturbance.

Internal Consultees

GBC Environmental Protection

The submitted noise impact assessment has been reviewed, and the findings are accepted. In terms of the nearest residential premises, calculated/modelled noise levels from the proposed plant/equipment located on the southern facade of the proposed building will be considerably below the existing background noise levels both during the day and at night. In respect of the proposed workers caravans located between the proposed cold store and the existing agricultural barn to the north, levels are still lower than the background although not quite as low as we would usually require (10 dB below background). As it's understood that these caravans are for seasonal workers associated with the farm, so only used on a temporary basis rather than rented separately over a longer term to individuals, this is considered to be acceptable. If granted, this should be in accordance with the details contained in the submitted WSP Noise Assessment.

Neighbouring properties

The application has been advertised on site. The overall consultation period expired on 4 September 2025.

No letters of representation have been received from neighbouring properties.

Local Ward Councillors were also consulted but no responses were received.

Officer's Analysis

Proposal

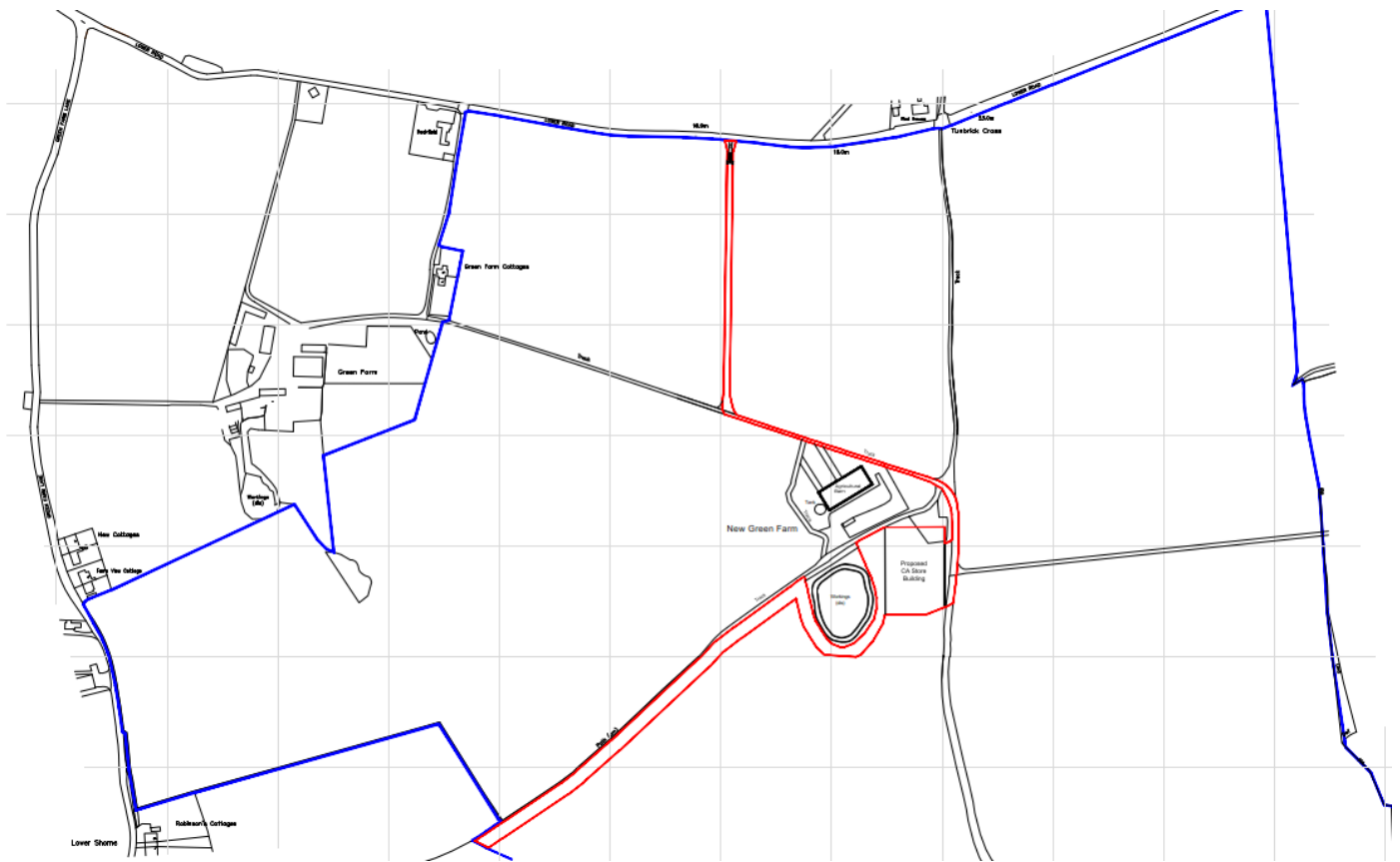
This application seeks permission for the erection of a cold store building.

During the application process, the proposed height of the building has been reduced, and revised plans have been submitted accordingly.

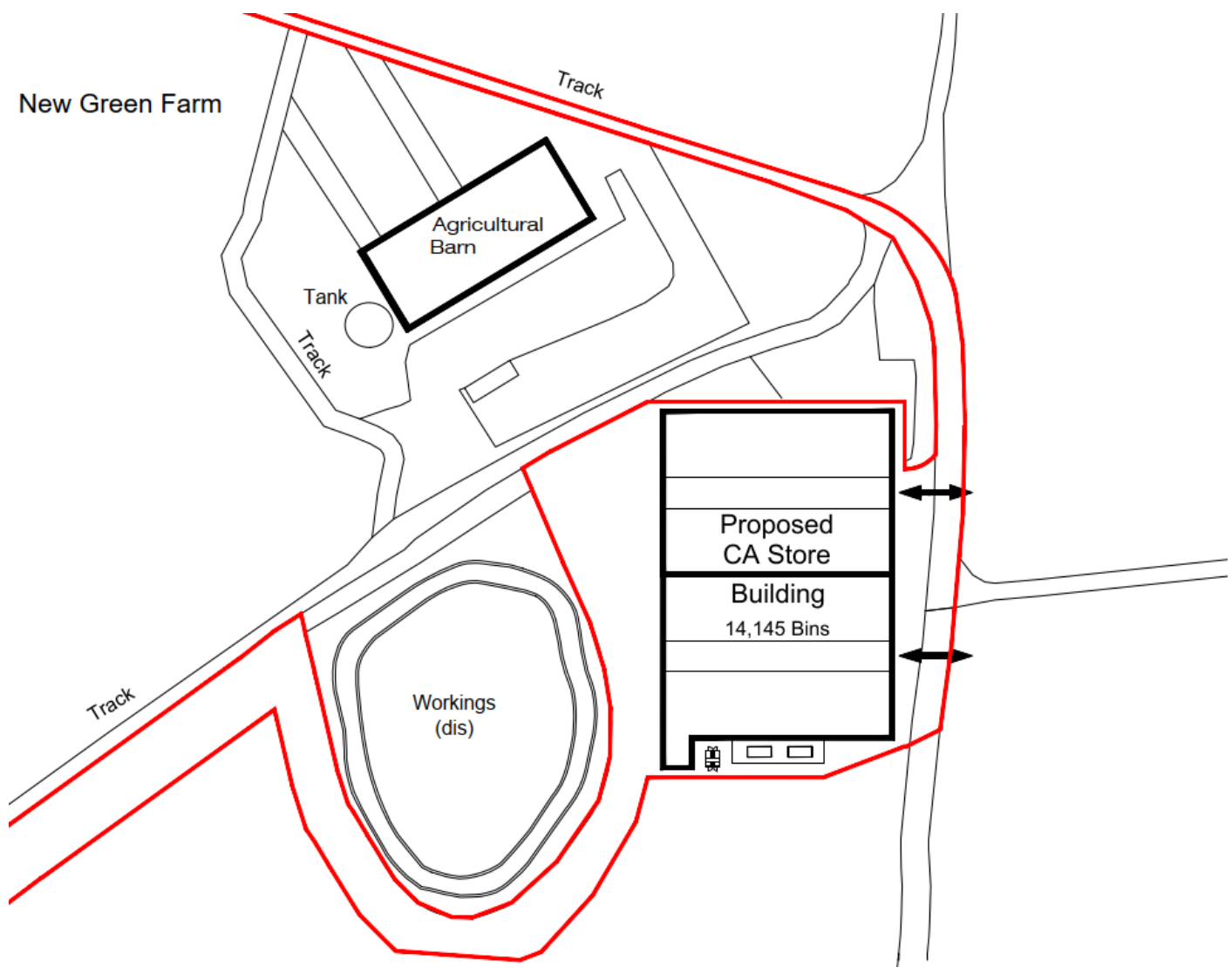
As set out in the planning history above, a cold store has been approved on the site under prior approval application 20240020. The current application seeks to erect a larger building in the same location for the controlled atmospheric storage of top fruit at New Green Farm, to the south-east of the existing farmyard and buildings.

Site Location:





Proposed Block Plan:

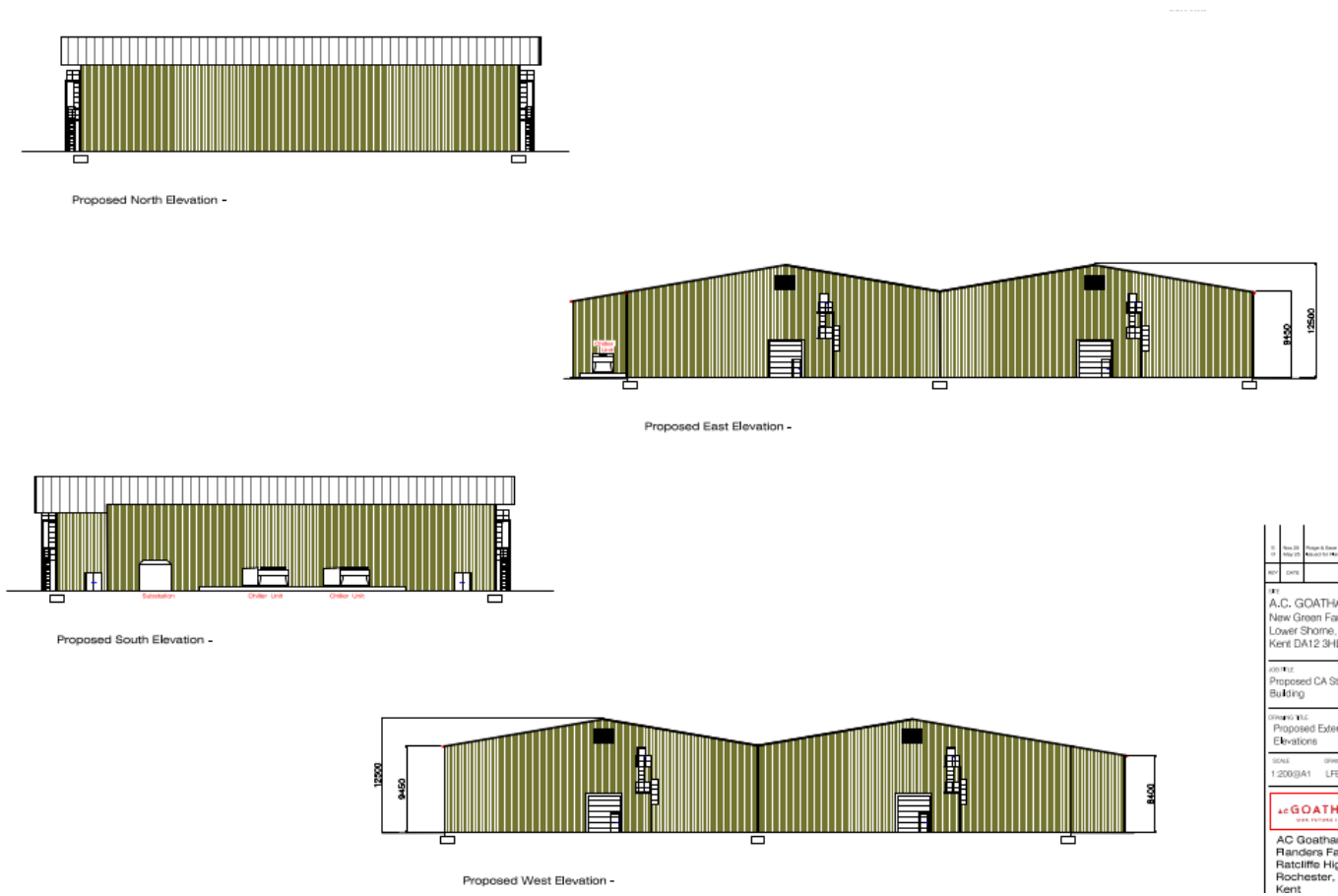


The previously approved cold store was designed to store 3,175 apple bins. However, the fruit crop to be produced at this site will require a significantly larger building, with the cold store now proposed being able to store 13, 045 apple bins to meet this need.

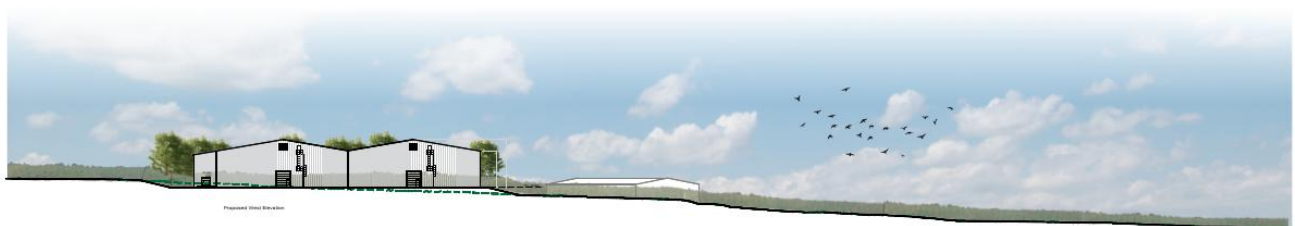
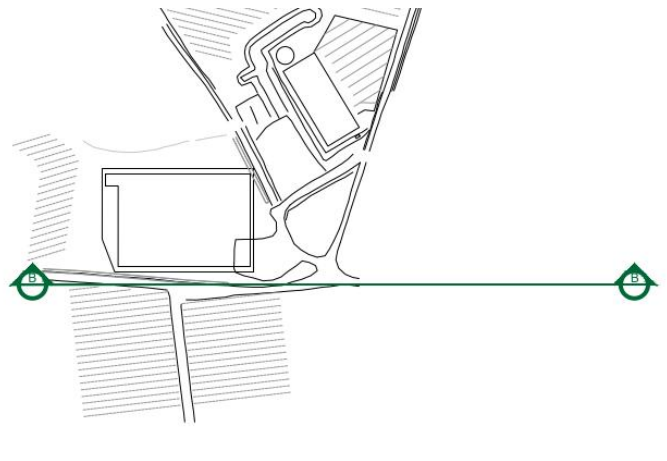
The proposed agricultural building that will be used for cold and controlled atmospheric storage measures 48.225m wide, 68.2m long, 9.45m at eaves and 12.5m to the ridge. This provides 3,289 square metres of floor space. The building does not incorporate any packhouse facilities.

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 access to the building in all weathers.

Proposed Elevations (including land levels)



Proposed Site Section



An electrical control room providing 35.68sqm of floor space and electricity substation measuring 10.38sqm is also proposed. To the south two chiller units on a 150sqm pad of concrete are also proposed.

The site can be accessed from Lower Road via internal agricultural access tracks. This access arrangement is well established and consequently no access alterations are proposed as part of this

application.

There will be biodiversity enhancement measures on land adjacent to the proposed cold store to the west, including additional wildlife-friendly and native tree planting, bird boxes and invertebrate features.

Principle Issues

The application site is defined on the Gravesham Local Plan Core Strategy Policies Map 2014 as lying outside any settlement boundary in the rural area, within the Green Belt and within the Higham Arable Farmlands Landscape Character Area.

New Green Farm comprises 67.5 hectares of owned land and a further 17.28 hectares of tenanted land planted with fruit trees. The farmyard comprises an existing agricultural storage building, a concrete yard area and seasonal workers accommodation.

Within this context, the main issues for consideration in the determination of this application are as follows:

- Principle of development in the Green Belt
- Design and impact on landscape character
- Residential amenities
- Parking and highways
- Biodiversity.

Principle of development in the Green Belt

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

Green Belts are of great importance. The fundamental aim of Green Belt policy is to prevent urban sprawl by preserving the open and permanent characteristics of Green Belts (paragraph 142 of the NPPF 2024). Paragraph 153 of the NPPF 2024 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

Local Planning Authorities should regard development as inappropriate in the Green Belt unless certain exceptions apply (paragraph 154 of the NPPF 2024). In the case of this proposal, the following paragraph 154 development exception is applicable:

(a) buildings for agriculture and forestry.

Building and need for agriculture

The submitted Planning Statement sets out the general industry position for top fruit handled in Kent and the UK. AC Goatham and Son is one of a small number of companies that handle the vast majority of top fruit in the UK. These businesses have all adapted their growing techniques to increase production by replanting orchards on new rootstocks at closer and higher densities using wire networks in order 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 at an affordable price. Higher harvest volumes require a need for supporting infrastructure, including the extent of cold storage.

The submitted Planning Statement sets out details about the ownership of New Green Farm and the

company behind it:

3.1 *AC Goatham and 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.*

The Planning Statement goes on to explain how AC Goatham and Son has grown, the innovations it has brought about and the reasons behind them:

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.*

The Statement then sets out the context behind the need for the proposed cold store:

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.*

The 20-year deal with Aldi represents a significant investment in British farming, with huge implications nationally.

Essentially, a significantly larger fruit crop is planned to be produced at New Green Farm, which will require a larger building to store the crop in order for the company to deliver on its contract and supply top fruit for the country.

Paragraph 88 of the NPPF 2024 states that planning decisions should enable the sustainable growth and expansion of all types of business in rural areas and the development and diversification of agricultural rural businesses. Policy CS07 of the Core Strategy 2014 sets out that proposals that promote the appropriate expansion and diversification of the rural area economy will be supported. There is a clear need for the proposal that has significant implications for the top fruit industry both locally and nationally, and this weighs in favour of the scheme. The proposal would comply with these economic policy aspirations for the rural area economy and would be acceptable in this regard.

In terms of the nature of the proposal, the proposed cold store is clearly 'a building for agriculture' and therefore would meet the exception set out in paragraph 154 of the NPPF 2024 and would not be inappropriate development in the Green Belt.

Design and Impact on Landscape Character

Section 12 of the NPPF 2024 relates to achieving well-designed and beautiful places and sets out the Government's requirements in relation to design issues. Paragraph 131 emphasises the importance of achieving high quality, beautiful and sustainable buildings and places. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 135 of the NPPF 2024 also seeks to ensure that development will add to the quality of an area, be visually attractive, and sympathetic to local character and history. Policy CS19 of the Core Strategy 2014 reflects these aims and requires that new development is well designed and respects the character and appearance of the surrounding area.

The application site is located in the Higham Arable Farmlands Landscape Character Area (LCA) within the wider Hoo Penninsular LCA and as such, Policy CS12 of the Core Strategy 2014 is also relevant. This policy states that the overall landscape character of the Borough will be conserved, restored and enhanced and that the Gravesham Landscape Character Assessment (GLCA) will be taken into account in determining applications. Paragraph 187(b) of the NPPF 2024 seeks to ensure planning decisions contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside.

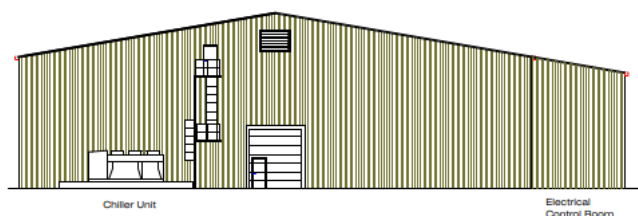
In relation to the Higham Arable Farmlands Landscape Character Area, one of the key characteristics of the area is the open, gently undulating farmland, which provides high visibility across the area. The overall condition of the landscape is poor and has moderate sensitivity. It is recommended that key landscape elements should be restored and created. Proposals that introduce extensive or obtrusive elements within visually sensitive areas of the open landscape should be resisted.

The site is located within a gently undulating agricultural landscape, sloping down from the south towards the Thames to the north. There is visibility across the area, though the appearance across and surrounding the site is of large areas of functional farmed orchards.

The proposed building is undoubtedly large and would introduce an obtrusive element into the current landscape. There is a concern about the impact of the building in the landscape, but it is recognised that there are various factors to consider in the assessment of this impact.

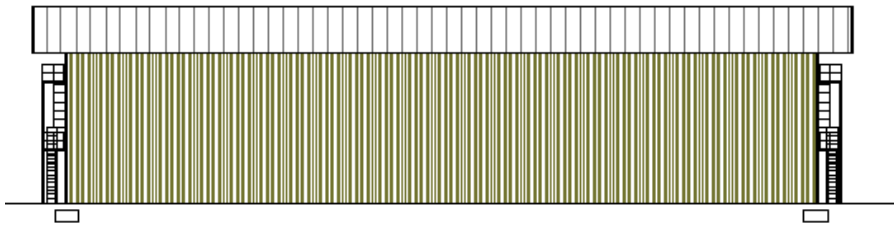
Firstly, it is helpful to consider the size of the cold store approved under prior approval and the differences between the two buildings:

Prior Approval Cold Store North Elevation:



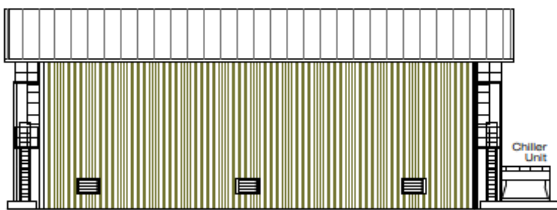
New Proposed Building - North Elevation

Current Proposed Cold Store North Elevation:



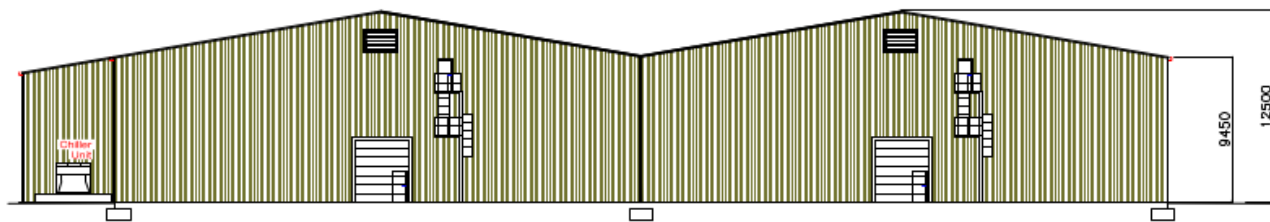
Proposed North Elevation -

Prior Approval Cold Store East Elevation:



New Proposed Building - East Elevation

Current Proposed Cold Store East Elevation:



Proposed East Elevation -

	Height to ridge (m)	Height to eaves (m)	Length (m)	Width (m)
Prior approval cold store	12	8.95	33.88	26.25
Current proposed cold store	12.5	9.45	68.2	48.225

The proposed cold store is only marginally higher than the previously approved cold store, but it is approximately double the width and length. Nevertheless, the size of the building that can be built under the prior approval application is still significant, and this must be considered in the assessment of the landscape impact.

As with the prior approval proposal, the proposed building would be located close to other farm development, including the existing large agricultural storage building and a recently approved farm manger's dwelling (application 20240812), which are located to the north-west. There is a disused chalk pit immediately to the west, which has mature tree planting across it. The proposed building would be positioned on an area of open land adjacent the chalk pit, surrounded by orchards, and located a significant distance from the nearest roads.

View across application site from north-eastern corner looking south-west:



In terms of the siting of the building, the proposal would be the most appropriate location in the context of its surroundings. The building will be similar in appearance to the prior approval proposal and would consist of a green profile metal sheeting to the walls and grey profile metal sheeting to the roof. It would have a small number of openings, reasonably necessary for convenient access and would be without windows, as would be expected for an agricultural storage building.

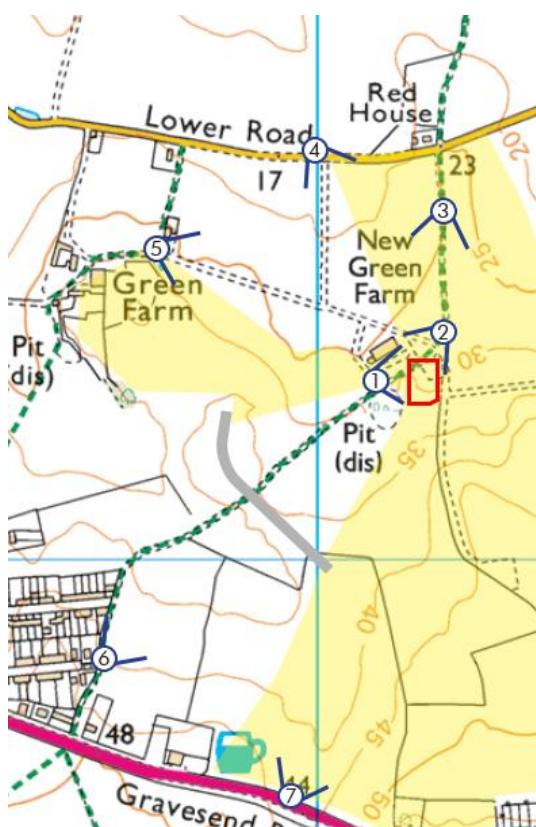
The siting and appearance of the prior approval proposal was previously considered to be acceptable, with its position, materials and design not being considered to harm the open rural character of the landscape. Whilst the current proposal is larger, particularly in terms of the width and depth of the building, the height is similar, and the proposal includes constructing the building into the ground which will help lower the overall height of the building.

A Landscape and Visual Appraisal (LVA) has been submitted with the application to identify and assess the predicted landscape and visual effects of the proposed development, as well as to inform the siting of the development and landscape strategy. The key points from the LVA are as follows:

- The LVA sets out those parts of the surrounding area from where it is considered that views of the proposal are most likely, described as the 'Primary Visual Envelope'. There are no protected views or distinctive landmarks that the site contributes to. Close distance views are restricted to views from the public footpath NS156 that runs to the north of the site. The LVA states that beyond the site's immediate surroundings, views of the site are filtered by the undulating topography, orchard frames and vegetation.
- The site is not defined as a 'valued landscape' in the context of paragraph 187 (a) of the NPPF 2024, which seeks to protect and enhance valued landscapes in a manner commensurate with their statutory status. The LVA assesses the landscape value of the site outside of national designations and concludes that the overall condition of the site is considered to be 'ordinary'.
- The LVA considers that overall, the site and its landscape setting are not reflective of the landscape character area described in the GLCA 2009, with the high prevalence of commercial orchards an uncharacteristic landscape use and the presence of widespread post and rail framework associated with the orchards limiting the perception of an open landscape. The LVA concludes that the landscape value of the current site is low.
- The proposed development would be implemented alongside a landscape strategy that would be implemented on land adjacent to the site, within the ownership boundary of the application. The LVA states that the landscape strategy seeks to 'build upon the existing vegetation adjacent to the site in order to contribute to the network of tree planting throughout the wider holding at New Green Farm and integrate the proposed development into its landscape setting. Native trees and shrubs would be planted within an existing tree line adjacent to the Site's northwestern boundary in order to increase the density and depth of planting and contribute to the visual screening of the development from footpath NS156 as it follows the northwestern boundary of the Site. The treeline would be extended to the north and east, reducing the proportion of the proposed building visible from footpath NS156 to the north of

the Site and supporting its integration into its setting within a working farm’.

- The LVA found the landscape susceptibility of the site (i.e. the ability to accommodate the development without undue negative consequences) to be low, due to its location within a human-influenced large-scale commercial orchard, the simple surrounding landscape pattern, the absence of features and low intervisibility between the site and surrounding landscape due to the height of the surrounding frames. This low susceptibility and overall low landscape value combine to produce a ranking of low landscape sensitivity.
- In terms of landscape effects, the LVA recognises the proposal would have direct and permanent effects as a result of a new built form and loss of cropland, grassland and vegetation. However, the existing landscape structure, land use and character would not change. The landscape strategy would help reinforce the landscape structure, provide visual screening and contribute to the network of habitats within the wider holding. The key valued features of the Higham Arable Farmlands and wider LCA would be unaffected as the development seeks to enhance the landscape structure and retain the agricultural use. The proposal is considered to have a high magnitude of landscape impact at Day 1 but when combined with the low sensitivity of the landscape this gives rise to landscape effects assessed as ‘moderate adverse’ at Day 1. Over time, this reduces to ‘slight adverse’.
- In terms of visual effects, various viewpoint locations have been selected to represent a range of visual potential effects. The most susceptible visual receptors include people engaged in outdoor activities on the public rights of way network, and particularly from public footpath NS156. Viewpoints 1 and 2 are closest to the site:



Viewpoint 1



Viewpoint 2



Viewpoint 5



Viewpoint 6



[NB. Viewpoints 5 and 6 show the proposed building at the original height of 14m; the revised eaves and ridge height has now been reduced from this.]

The magnitude of effect at Day 1 has been assessed as 'medium adverse'; this decreases to 'slight adverse' by year 15.

- In conclusion, the LVA finds that the proposed development introduces built form into a part of the agricultural landscape that is not pristine, functioning as a commercial orchard with built form and planting frames frequent. Whilst the scale of the building is large, it is proportional to its function and proposed to be sited where existing vegetation, built form and topography provides a degree of screening of the proposed development from the wider landscape. The adverse landscape effects resulting from the proposed development would be very localised and limited to the site itself. The existing landscape pattern, structure and character of the Higham Arable Farmlands and wider Hoo Peninsula LCA would be maintained, with the proposed landscape strategy contributing to the creation of habitats and reducing the visual impact of the proposed development over time.

The LVA finds the highest landscape impacts to be 'slight adverse' over time, and whilst this does weigh against the proposal, these impacts are not considered to outweigh the overall economic advantages of the scheme and its necessity for agricultural purposes.

The extent of the building will be large, but a large agricultural building can also be built under permitted development, and the proposed lowering of the ridge and eaves height will keep the height to what has previously been approved and therefore will keep the visibility of the building akin to that proposal, particularly from a distance, which will lessen the effect on the wider landscape. The proposed landscaping will also further aid the screening of the development, and where none is currently proposed to the south of the building, this can be sought; such details can be conditioned. It will also be important to restrict any further expansion of built development on the site to be able to consider the landscape impact further, and if the building were ever to become redundant it can be conditioned to be removed and the land restored.

Overall, the proposal will introduce a functional (albeit large) building into a functional orchard. The location of the proposed cold store close to other agricultural development at the site, the reduced height of the building, the appropriate agricultural appearance, and the proposed landscaping are not considered to significantly harm the rural character of the landscape, and the proposal is considered to be acceptable and in line with Policies CS12 and CS19 of the Core Strategy 2014 and paragraph 187 of the NPPF 2024.

Residential Amenity

The NPPF 2024 states that planning decisions should aim to secure a high standard of amenity for all existing and future users (paragraph 135f). The impact on amenity is also considered with regard to the criteria within Policy CS19 of the Core Strategy 2014, which states that new development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land, and avoid adverse environmental impacts from pollution. As the site is located a significant distance from neighbouring residential properties, it would not have any adverse impacts on outlook, light or privacy to such properties.

A Noise Assessment has been undertaken for the proposal to ensure it would not impact on neighbours, which concludes that the potential for noise impact from the proposed development would be low and acceptable in planning terms. The Council's Environmental Protection Officer has reviewed and accepted the findings of the noise assessment. Calculated/modelled noise levels from the proposed plant/equipment located on the southern facade of the proposed building will be considerably below the existing background noise levels both during the day and at night. In respect of agricultural workers caravans, levels are still lower than the background, although not quite as low as usually required (10 dB below background). As it is understood that such caravans are for seasonal workers associated with the farm, and so only used on a temporary basis rather than rented separately over a longer term to individuals, this is considered to be acceptable. If permission should be forthcoming, it should be granted in accordance with the submitted noise assessment.

On this basis, the proposal would comply with the requirements of Policy CS19 of the Core Strategy 2014 and paragraph 135 of the NPPF 2024.

Parking and Highways

The proposed building would be accessed via existing internal farm accesses from Lower Road and there are existing areas within the site for the parking and turning of vehicles. No additional access or areas of hardstanding are required as the existing access and yard area will provide adequate access to the building in all weathers.

In terms of accessing the store, tractors with trailers will drive to the store from the orchard where they can park on the existing track to the east of the building (orientated north/south) and the bins will then be uploaded by forklifts from the side. When it comes to fruit leaving the farm to go to the packhouse, it will do so on HGVs with curtains (i.e. ones that are loaded from the side using a forklift), meaning these vehicles park on the existing track that goes north/south. There is a further existing track that extends west/east, which the vehicles can turn in if necessary.

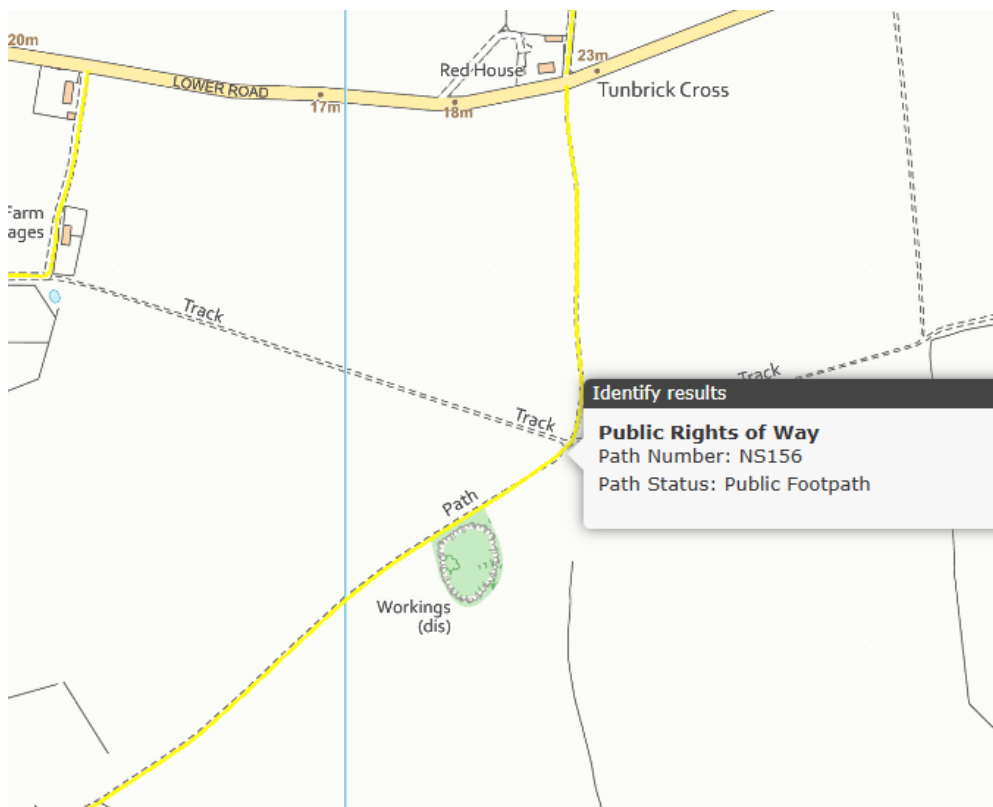
The Planning Statement states that fruit currently needs collating in the main yard area before being transported out by HGVs across various sites to cold stores across Kent, though these are insufficient and in short supply. The need to get fruit into store as soon as possible after harvest means that vehicles currently leave New Green Farm whilst not at full capacity, which is unsustainable and means more vehicle movements. The current proposal will allow the fruit to be put in store straight away and when it is eventually needed, it can be taken from the store in more efficient loads. The proposal would improve the sustainability of the farm operations and disburse traffic movements more evenly throughout the year.

There are no concerns raised by KCC Highways in relation to the submitted transport information, which as stated, sets out that the proposal would not increase the number of vehicle movements generated onto the local highway network but merely spread the total generation over a longer period. No additional staff vehicle movements would be generated.

In parking and highways terms, the proposal would not cause an unacceptable impact on highway safety or lead to severe impacts on the road network, and would therefore comply with Saved Policies P3, T1 and T5 of the Local Plan 1994, Policy CS11 of the Core Strategy 2014 and paragraph 116 of the NPPF 2024.

The private track leading from Lower Road turns eastward and continues until it intersects with Public Right of Way (PROW) NS156. The proposed development site is located immediately south of this footpath.

KCC's Public Rights of Way Officer has commented that the proposed development will result in increased vehicle movements across Footpath NS156, including large and heavy machinery.



This will pose a significant safety risk to pedestrians using the path. Clear and permanent signage should be installed to indicate that NS156 is a pedestrian route, ensuring visibility and awareness for all site users and vehicle operators. Any landscaping or shrub planting near the Public Right of Way must also be set back sufficiently to allow for full growth without encroaching on the path. This is essential to maintain accessibility and prevent future obstruction. These matters can be conditioned.

The applicant should also be advised that any works on the PROW should obtain the consent of the Highways Authority, and it must not be stopped up, diverted, obstructed or the surface disturbed.

Any Other Material Planning Considerations

Archaeology

The site lies within an area of multi-period archaeological potential. However, based on existing Historic Environment Record data for the area and the fact that part of the site was historically one of two adjacent chalk pits, it is considered unlikely that the proposals would have a significant below-ground archaeological impact. The proposal therefore complies with Policy CS20 of the Core Strategy 2014 and paragraph 203 of the NPPF 2024.

Drainage

A Drainage and Sustainable Water Drainage Strategy has been submitted with the application and KCC as Lead Local Flood Authority has no objections to the proposed drainage in principle, subject to a condition requiring further detailed design. The proposal therefore complies with Policy CS18 of the Core Strategy 2014 and paragraph 182 of the NPPF 2024.

Biodiversity

The NPPF 2024 in paragraph 187 states that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity. Policy CS12 of the Core Strategy 2014 reflects this stance and states that there will be no net loss of biodiversity

in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought.

A Preliminary Ecological Appraisal (PEA), a BNG Metric and a Biodiversity Gain Plan have been submitted with the application, which KCC Biodiversity have deemed to be sufficient to determine the application.

The submitted Preliminary Ecological Appraisal provides a good overview of the site. No further ecological surveys are deemed necessary. A precautionary approach is recommended for badgers, reptiles and nesting birds, and other protected/priority species are reasonably scoped out. A CEMP condition is recommended.

It is also recommended that a lighting condition be included, as lighting can have a negative impact on bats and other nocturnal species. The condition should require the lighting plan to follow the recommendations within the Bats and artificial lighting in the UK document produced by the Bat Conservation Trust and Institution of Lighting Professionals.

The submitted Statutory Biodiversity Metric describes the application site as 0.42ha of cereal cropland and modified grassland/ruderal vegetation. These are all low distinctiveness habitats. The proposed development will result in the total loss of onsite habitats. As compensation, the applicant proposes the offsite enhancement of 0.59ha of arable field margins to 'Arable field margins pollen and nectar'. This offsite enhancement will deliver 14.33% biodiversity gains. A biodiversity gain plan condition will require details of how this can be achieved.

With the inclusion of the above conditions, the development is considered to comply with the requirements of paragraphs 187 and 193 of the NPPF 2024 and CS12 of the Gravesham Core Strategy 2014.

Conclusion

There is a clear agricultural need for the proposed cold store that has significant implications for the top fruit industry both locally and nationally, and this weighs in favour of the scheme. The proposed cold store is clearly 'a building for agriculture' and therefore would also meet the relevant exception set out in paragraph 154 of the NPPF 2024 and would not be inappropriate development in the Green Belt. The proposal is also acceptable in terms of residential amenity, highways and parking, archaeology, drainage and biodiversity matters.

The proposal will introduce a large functional building into a large functional orchard and it will have an impact on the rural landscape. However, given the acceptability of the proposal in all other respects, and considering the location of the cold store close to other agricultural development at the site, the reduced height of the building, the appropriate agricultural appearance, and the proposed additional landscaping, overall the proposal is not considered to significantly harm the rural character of the Higham Arable Farmlands and wider Hoo Penninsular landscape. The proposals would therefore comply with the requirements of Policies CS02, CS07, CS11, CS12, CS18, CS19 and CS20 of the Core Strategy 2014, saved Policies T1, T5 and P3 of the Local Plan 1994, and paragraphs 88, 116, 131 135, 182, 187, 193 and 203 of the NPPF 2024.

Recommendation

Permission with conditions

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mrs Katherine Parkin	Team Leader:	Richard Hart
Signed:	<i>K. Parkin</i>	Signed:	<i>R Hart</i>

Dated:	13 November 2025	Dated:	14th November 2025
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