

Planning Inspectorate Ref: APP/A2280/W/20/3259868

Medway Council Ref: MC/19/1566

**Land Off Pump Lane, Rainham
APPEAL by A C Goatham & Son**

Evidence of Richard John Lloyd-Hughes

Appendix RLH 03

Appellants' Hub and Satellite farms, comprising:

- Competitive advantages of hub and satellite farms, extracted from applicants' agents' Statement supporting application 20/502074/FULL at Howt Green Farm, Bobbing, **para. 4.10.**

- Location Plan of Appellants' Hub and Satellite farms, from the same Statement

The full statement is reproduced in Appendix RLH 02.

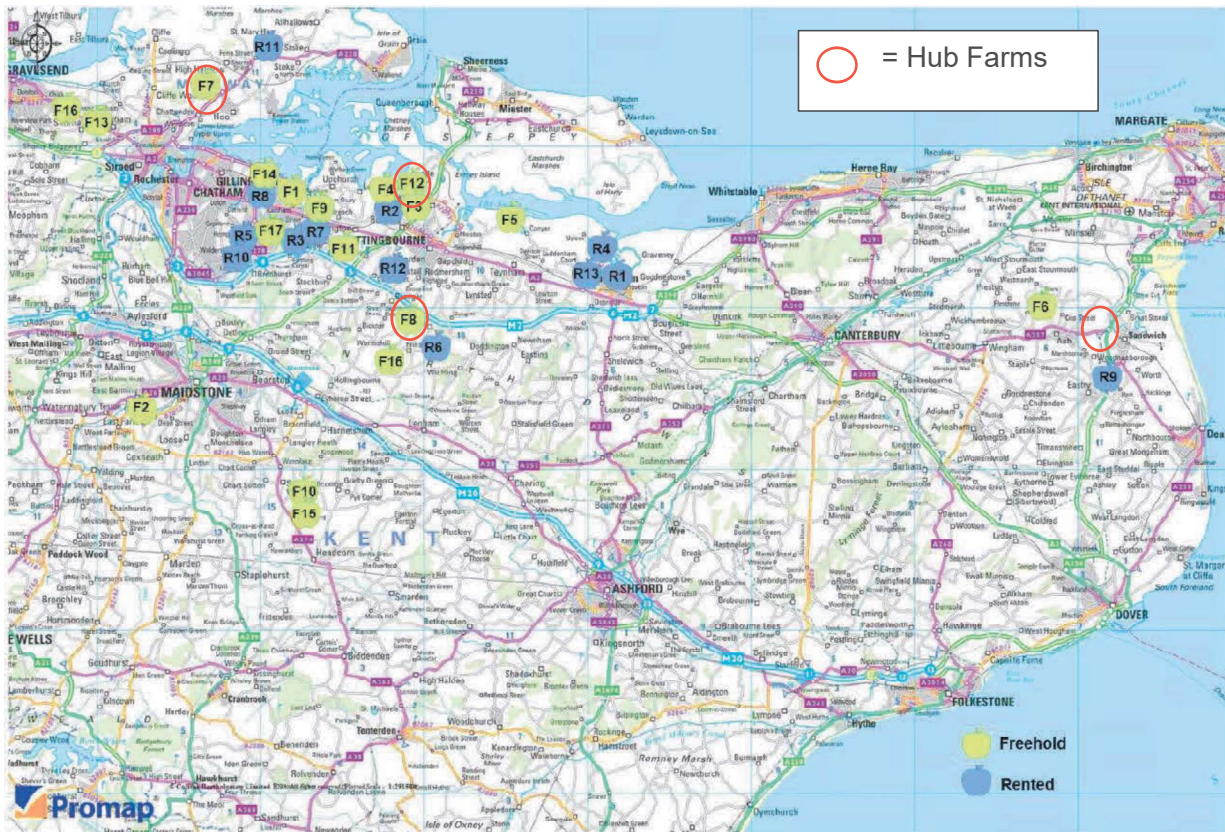


Figure 4 - Plan indicating location of AC Goatham Freehold and rented farms

- 4.10. Irrespective of any perceived planning constraints on specific sites, it is not feasible or logistically possible to provide the infrastructure required to make each farm 'self-sufficient' in storage term needs, accommodation provision, machinery and equipment and/or buildings necessary to store such equipment and machinery. We are not aware of any of the leading commercial topfruit farmers operating like this. Instead, to remain competitive, topfruit farms are dependent on either limiting their farms to within a very close proximity to each other or having a hub farm system to service the needs of a range of holdings in close proximity in order to make fruit growing commercially viable. The use of the hub farms also allows businesses to serve any rented farms they have; which business and lenders are understandably reluctant to invest in or borrow against.

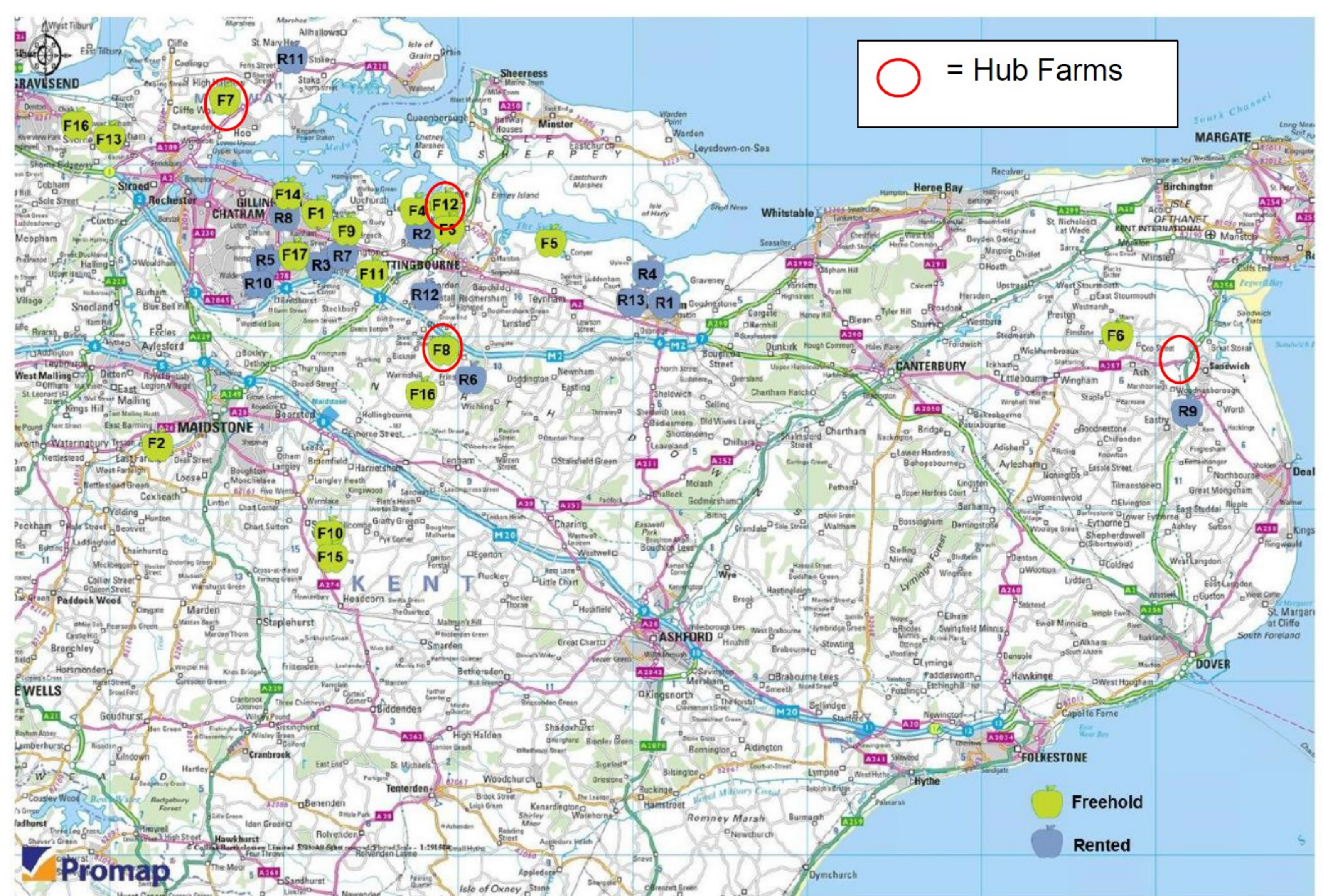


Figure 4 - Plan indicating location of AC Goatham Freehold and rented farms