



The countryside charity Kent

20250992

Land At Wrotham Road, Meopham

Outline application for the erection of up to 350 residential dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Wrotham Road and all other matters are reserved.

We are CPRE, the countryside charity. Formed in 1926, CPRE is a registered charity and one of the longest established and most respected environmental groups in England, with over 15,000 members and supporters living in our cities, towns, villages and the countryside.

CPRE Kent is the largest local branch of the Campaign to Protect Rural England. We represent 1,173 individual members, of which there are over 100 parish councils, local amenity groups and civic societies.

Our vision is of a beautiful and thriving countryside that enriches all our lives and is valued by everyone. Our mission is to promote, enhance and protect that countryside.

It is our position that planning decisions should seek to ensure that the impact of development on the countryside, both directly and indirectly, is kept to a minimum (by adopting a brownfield land first approach) in accordance with national planning policy.

We believe that the planning system is a toolbox for achieving better – for people, nature and the economy – while supporting the delivery of badly-needed homes to end the housing crisis.

CPRE Kent OBJECTS to the above application on the grounds that the proposed development will constitute unsustainable development in the countryside, specifically:

1. not Plan-led development;
2. loss of best and most versatile agricultural land – no evidence is provided regarding the opportunities to develop brownfield land, and the availability, or otherwise of lower grade land (sequential assessment);
3. loss of green belt; and
4. landscape impact

These objections set out in more detail below.

1. Not Plan-led

The site is not allocated for housing development.

Paragraph 15 of the National Planning Policy Framework (NPPF) states that “the planning system should be genuinely plan-led,” yet this scheme has not emerged from the Council’s adopted Local Plan Core Strategy (2014).

We do note, however that this site was included as one of many potential development sites in the Council’s Regulation 18 consultation in 2020 as site GBS-D: land to the south of Green Lane and east

of Wrotham Road, Hook Green, with an estimated capacity of 350 dwellings – see figure 14 and appendix 3/3.

CPRE Kent objected to this potential allocation on the grounds that a brownfield first approach must be taken, development would result in the loss of best and most versatile agricultural land and green belt.

Publication of the Council's Regulation 19 consultation has been long-delayed. The Local Development Scheme (adopted March 2025) indicates that the next round of public consultation will take place in December 2025. Until the Council's spatial strategy has been made clear (with an expected emphasis on putting brownfield land first, intensification (increased yields) and protection of BMV, to ensure future food security), there is no guarantee that this site will form part of the Council's emerging local plan.

As the development plan currently stands, the site lies within the green belt where Core Strategy policy CS02 and section 13 of the NPPF strictly limit inappropriate development.

Whilst we acknowledge that the Local Plan remains at an early stage, it is our firm view that green belt sites should be tested through a robust local plan process, not through ad-hoc speculative applications. To do otherwise would conflict with the principle of Core Strategy policy CS01, which seeks to direct development to the most sustainable locations consistent with the Council's overall spatial strategy.

Granting permission will undermine policy CS01 and the requirement for sustainable, Plan-led growth. It would also conflict with NPPF paragraph 124, which directs authorities to prioritise the reuse of previously developed land in support of a "brownfield-first" approach. For these reasons, the proposal is clearly contrary to policy.

2. Best and most versatile agricultural land

The proposed development would result in the loss of best and most versatile land. The glossary at Annex 2 of the NPPF defines best and most versatile agricultural land as land in grades 1, 2 and 3a of the Agricultural Land Classification.

We note the submission of an Agricultural Land Classification study, but the applicant does not appear to have addressed the BMV issue within the submitted planning statement.

Development in this location would not only have an impact on food security, but would also prejudice the conversation that the government has stated it wants to have in terms of giving "decision makers the data they need to protect our most productive agricultural land, boosting Britain's food security in a time of global uncertainty and a changing climate", as set out in the consultation document – Land Use in England – which was launched on 31 January 2025.

Section 15 of the NPPF highlights that planning policies and decisions should contribute to and enhance the natural and local environment (paragraph 187b) by recognising the intrinsic character and beauty of the countryside and other benefits of the best and most versatile agricultural land, and of trees and woodland. As such, this application is in direct conflict with this statement.

CPREs research indicates that between 2010 and 2022, over 14,000 hectares of BMV land was lost to development in the UK. The impact of chipping away at our best and most versatile land is a cumulative consideration and must be given great weight.

The applicant's planning statement does not detail any search for alternative sites or provide evidence that brownfield sites have been considered. As such, CPRE Kent objects to the proposed development in principle due to the loss of BMV, when no brownfield options appear to have been considered.

CPRE's State of Brownfield Report 2025 shows enough brownfield land nationally for 1.48 million homes, half with planning permission already in place, confirming that brownfield is a real and deliverable resource if given priority. This should be prioritised and might well be if the application is worked through the local plan process, rather than being speculative.

The applicant's planning statement provides no clear evidence that a sequential assessment has been carried out, nor that brownfield or lower-grade alternatives have been fully explored. This omission renders the proposal inconsistent with the NPPF's brownfield-first approach set out in paragraph 124.

For these reasons, CPRE Kent objects in principle to the development on the grounds of unnecessary and unjustified loss of BMV agricultural land, contrary section 15 of the NPPF.

3. Loss of green belt

CPRE Kent does not consider the applicant has sufficiently substantiated the claim that the site qualifies as "grey belt" under paragraph 155 of the NPPF (2024).

The applicant seeks to address the green belt issue at paragraphs 6.12-6.21 of the submitted planning statement. No independent assessment has been undertaken – instead conclusions from the Council's 2020 Stage 2 Green Belt Study have been put forward in support of this scheme. It would be reasonable to assume that the Council will be publishing its own grey belt review as evidence to its forthcoming Regulation 19 consultation – again underlying the need for development to be Pan-led.

The applicant's review of the previous green belt study that this site makes limited or no contribution to green belt purposes a, b and d overlooks the clear role this site makes in containing the eastern edge of Hook Green and maintaining a visual and spatial break with the wider rural landscape. This landscape (where it abuts the applicant's blue line ownership boundary) adjoins the designated Kent Downs National Landscape.

It should be noted that, contrary to the applicant's statement (paragraph 6.17) that the site is "fully enclosed." The site adjoins development on Green Lane and Wrotham Road but cannot reasonably be described as being enclosed by development to the south. This area comprises very loose-knit development in the vicinity of the Grade I Listed St John the Baptist Church at Meopham Court. Taken at face value the applicant appears to be deliberately underplaying this wider function.

Even if the Council were to agree that this site meets the definition of grey belt, it doesn't remove the requirement for harm to the green belt to be clearly outweighed by other considerations. The loss of openness, both visually and spatially, would remain significant. Housing need, while acknowledged, cannot on its own amount to a very special circumstance. National policy makes clear that unmet housing need does not justify inappropriate development or override the presumption against building in the green belt.

Further, the Council must also carefully consider the applicant's reliance on the "golden rules" in paragraphs 156–157 of the NPPF (2024). These provisions are not a new route for green belt release but a means to ensure that any claimed very special circumstances are assessed transparently and with full regard to openness. In the event that planning permission is granted, CPRE Kent would want to see 50% affordable housing robustly secured on site.

CPRE Kent is of the opinion that the proposed development is not fully aligned with NPPF paragraphs 142–151, which reaffirm that the essential purpose of green belt policy is to prevent urban sprawl and maintain openness. As the applicant hasn't demonstrated a credible or exceptional case that could outweigh the harm identified and the scheme would diminish the openness and function of the green belt, the proposed development is contrary to both the development plan and national planning policy.

4. Landscape Impact

Meopham village comprises three distinct parcels Hook Green, Meopham and Meopham Green each reading as an entity in its own right, straddling the A227. These sub-settlements read as distinct developments, separated by openness afforded by (primarily) undeveloped countryside.

Just south of the application site is The Street, Meopham conservation area (with the Grade I Listed Church at its centre). There is also a conservation area centred around the area of open space at Pitfield Green, Meopham Green. Openness and heritage assets are key aspects in determining the character of the local area. Developing in a significant area of this openness will be detrimental to the character and appearance of the countryside setting of these three inter-linked settlements.

In addition, the application site lies within the setting of the Kent Downs National Landscape and Camer Park Country Park (which lies within the KDNL). The KDNL is a high sensitivity landscape receptor. We presume that the Kent Downs Landscape Unit has been asked to comment on these proposals.

It is our firm view that the proposed development would result in clear and measurable harm to the landscape character and visual amenity of Meopham and its rural setting. Accordingly, the proposal conflicts with Core Strategy policies which require development to respect local character, protect landscape setting and safeguard important views. It also contrary to paragraphs 135–139 and 187 of the NPPF which require that planning decisions protect and enhance valued landscapes and refuse poorly sited or designed schemes that harm the character and beauty of the countryside.

Conclusion

In conclusion, CPRE Kent maintains that this speculative proposal is not Plan-led and conflicts with both local and national planning policy. It lies within the green belt, where we question whether the case for "grey-belt" or "very special circumstances" has been demonstrated, contrary to Core Strategy policy and NPPF paragraphs 142–151.

The development would also lead to the unnecessary loss of best and most versatile agricultural land, in conflict with NPPF paragraph 187(b), and would cause clear harm to the rural setting and landscape character of Meopham and should therefore be refused.