

The Granary
Penstock Hall Farm
Canterbury Road
East Brabourne
Ashford, Kent TN25 5LL

Our Ref: 17740_C01a
14 April 2026

FAO Alison Webster

Application ref: 20250993

Proposal: Outline application for the erection of up to 120 residential dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Longfield Road and all other matters are reserved.

Location: Land adjacent to Longfield Road, Meopham, Gravesham

- 1.1. This note responds to the Kent Downs National Landscape (KDNL) letter dated 3 December 2025 for Land adjacent to Longfield Road, Meopham. Its purpose is to address the matters contained within the letter relating to proximity, visibility and whether the Site forms part of the National Landscape's (NLs) "setting", based on the findings of the Landscape and Visual Impact Assessment (LVIA) (report ref. 17740_R01a) prepared by Tyler Grange Group Limited (TG) as part of the above planning application.
- 1.2. Several plans that support the LVIA have been referenced below, and for ease have been appended to the back of this response.

Summary of the LVIA Findings

- 1.3. For ease, the conclusions of the LVIA relevant to the KDNL are summarised here before the detailed point-by-point response:
 - **No views from within the KDNL:** The LVIA's Zone of Theoretical Visibility (ZTV) and field verification demonstrate no intervisibility with the KDNL; visual receptors within the KDNL were scoped out (para 3.13 of 17740_R01a LVIA).
 - **Separation and context:** The Site is located c.800 m west of the KDNL boundary, with Hook Green and school infrastructure located between; there is no visual or perceptual link to the KDNL (para 3.13 of 17740_R01a LVIA).
 - **Localised effects:** Embedded landscape design provides Public Open Space (POS) and structural planting along the southern and south-eastern boundaries, containing effects to local receptors (para 6.7-6.10 of 17740_R01a LVIA).



Design Evolution

- 1.4. The LVIA and Illustrative Landscape Strategy were informed by pre-application engagement with Gravesham Borough Council. In its pre-application response (PRE20250101), the Council advised that “considering the rural location of the site, a landscape led-approach to the development would be appropriate.” This advice has informed the evolution of the proposals, including the focus on edge treatment, settlement containment and the structure of open space and planting.
- 1.5. A Design Review Panel (DRP) was held on the 6th June 2025 to inform and refine the landscape-led approach identified through pre-application engagement. In response to DRP feedback, the following updates were made to the layout in respect of landscape and visual matters:
 - Public Open Space (POS) within the Proposed Development was relocated to the southern and south eastern boundaries, establishing a deeper landscape buffer and a softer transition between built form and open countryside. Built form along this edge is set back at varying distances, creating an irregular settlement edge rather than a rigid or continuous building line. This variation increases the perceived depth of the buffer, reduces visual uniformity at the countryside interface, and helps moderate the transition between the settlement and the surrounding landscape.
 - Primary routes are aligned to natural contours of the site to reduce the Proposed Developments visual impact and improve legibility.
- 1.6. The evolution of the design was also informed by Green Belt considerations, recognising the need to limit the perception of encroachment, create a defensible settlement boundary, and maintain openness within the surrounding Green Belt. In response, lower-density development has been located adjacent to a well-treed, layered southern landscape buffer, with varied building setbacks and route alignments informed by the existing landform. Together, these measures reduce the visual and spatial influence of development beyond the settlement edge.

Landscape Response

- 1.7. The planning application was submitted on 30 September 2025 under the reference 20250993. The table below (table 1) itemises the comments made on planning application 20250993 by the KDNL Team (dated 3rd December 2025) with responses provided by TG.



Table 1: TG Responses to KDNL Comments

Item	<i>Kent Downs National Landscape Response - 03/12/25</i>	TG Response
1.	<i>The application site lies in the setting of the Kent Downs National Landscape, by virtue of its proximity to the National Landscape (less than 300m [sic] to the west) and the fact that the site is visible in views from the Kent Downs. The application should therefore be tested against the purpose of the AONB designation, to conserve and enhance the natural beauty of the National Landscape, in line with paragraph 189 of the NPPF.</i>	The Site is located approximately 800m west of the Kent Downs National Landscape boundary, as shown on the Landscape Planning Policy & Designations Plan (17740_P06, Appendix 1). The KDNL's own letter subsequently records the distance as "approximately 800m," correcting the earlier "<300m" statement. As confirmed by the ZTV (17740_P03 Zone of Theoretical Visibility, Appendix 1) and field verification, there is no intervisibility between the Site and visual receptors within the KDNL. Paragraph 3.13 of the LVIA states: "The physical separation between the Site and the KDNL includes the settlement of Hook Green and educational facilities, which contribute to physical and visual separation between the Site and KDNL. Desk-based studies and field assessments confirm that there is no intervisibility between the Site and visual receptors within the KDNL." The LVIA concludes that there are no effects on views to or from the KDNL and visual receptors within the KDNL were therefore scoped out. Consistent with the above evidence, paragraph 3.13 of the LVIA concludes that the Site does not form part of the setting of the KDNL. On that basis, the KDNL and its settings was appropriately scoped out as a landscape receptor. Accordingly, the proposals would not alter the character, tranquillity, or experience of the KDNL. Even if the decision-maker were nevertheless to consider the Site as being within the KDNL's "setting", paragraph 189 of the NPPF does not preclude development in such locations but requires that proposals are sensitively located and designed to avoid or minimise adverse impacts. In this case, the absence of any visual or perceptual relationship with the KDNL, together with the contained layout and boundary planting shown on the Illustrative Landscape Strategy (17740_P01, Appendix 1), would ensure that such impacts are avoided or, at worst, minimised. This approach reflects the Inspector's application of paragraph 189 in APP/H2265/W/24/3347410 (Moto Hospitality, M26 Junction 2a), an appeal concerning a commercial development located approximately 8 km to the south of the Site, where part of the appeal site directly abutted the Kent Downs National Landscape and was explicitly assessed as lying within its setting. In that case, the Inspector concluded that the proposal would accord with paragraph 189 because it did not harm "how views from or towards the scarp of the KDNL would be experienced", reinforcing that identification of land as forming part of a National Landscape's setting is not determinative in itself.



Item	<i>Kent Downs National Landscape Response - 03/12/25</i>	TG Response
2.	<i>The Kent Downs Management Plan 2021 to 2026 sets out the policy for the conservation, enhancement and management of the National Landscape in a series of aims, actions and Principles. The following principles from the Management Plan are considered to be of particular relevance to the current application:.....</i> <i>.....SD8 Ensure proposals, projects and programmes do not negatively impact on the distinctive landform, landscape character, special characteristics and qualities, the setting and views to and from the Kent Downs AONB.</i>	As the Site lies outside the KDNL, there would be no physical change to the KDNL's distinctive landform. The Site is approximately 800 m from the designation boundary and is separated from it by the settlement of Hook Green, large educational facilities and layers of boundary vegetation and infrastructure that provide both physical and visual separation. The LVIA confirms no intervisibility with receptors within the KDNL. This is based on ZTV analysis (Appendix 1) and field verification; on that basis, visual receptors within the KDNL were scoped out. The KDNL also acknowledges that <i>"there is no intervisibility between the site and visual receptors within the National Landscape."</i> In visual and perceptual terms, the combination of c.800 m separation, intervening settlement and infrastructure, and the absence of intervisibility means that the LVIA identifies no effects arising on the KDNL in relation to landscape character, special qualities, setting or views. On that basis, the LVIA scopes out KDNL as a landscape receptor, and visual receptors within the KDNL, and concludes the proposals would not alter the character or experience of the KDNL. In relation to Principle SD8, the LVIA has therefore assessed the matters it seeks to protect and finds no adverse effects arising from the proposed development.
3.	<i>The application site lies approximately 800m from the boundary of the Kent Downs National Landscape. Although there is no intervisibility between the site and visual receptors within the National Landscape, the site forms part of an important green buffer between the settlements of Hook Green and Meopham and the nucleated and separate nature of these villages makes a positive contribution to the setting of the National Landscape. For these reasons it is considered to lie within its setting.....</i>	The KDNL acknowledges that there is "no intervisibility" between the Site and receptors within the KDNL. The LVIA reaches the same conclusion, supported by the ZTV and field verification (Appendix 1). The area described by the KDNL as a "green buffer" comprises a tract of open farmland between Hook Green and Meopham. While this land currently contributes to the local rural setting of the villages, it does not function as a buffer between settlement and the KDNL, nor does it form part of the designation itself. The Site sits on the south-western edge of Hook Green, with the settlement, educational facilities and boundary vegetation providing physical and visual separation to the east towards Camer Park and the KDNL, as illustrated on the Landscape Planning Policy & Designations Plan (Appendix 1). The LVIA identifies landscape and visual change as localised and predominantly to the immediate settlement edge. Receptors to the east were scoped out due to a lack of visibility (including PRoW NS192 and NS252), and the assessment concludes that the proposals would not alter the character or experience of the KDNL or its setting. The LVIA also assessed the residual effect on local landscape character as negligible adverse by Year 15, as planting establishes.



Item	<i>Kent Downs National Landscape Response - 03/12/25</i>	TG Response
	<i>.....The application site is a large area of undeveloped farmland to the west of the village of Hook Green and extending south into the belt of open countryside that separates Hook Green from the village of Meopham. This open countryside, of which the application site forms a part of, plays an important role in establishing and supporting the rural and nucleated character and appearance of both villages and is characteristic of the setting of the National Landscape here which is comprised of clearly defined scattered settlements set amidst open farmland.....</i> <i>.....Development of this open greenfield site would erode the open agricultural setting of the villages of Hook Green and Meopham, fundamentally changing the character of landscape that currently makes a positive contribution to the setting of the National Landscape.</i>	The proposed landscape strategy responds directly to concerns about settlement separation. The southern public open space and layered structural planting shown on the Illustrative Landscape Strategy (Appendix 1) create a soft, defensible settlement edge and reinforce the nucleated pattern of Hook Green, consistent with the Meopham Downs LCA guidance to reinforce village identity and maintain separation between settlements. These measures further limit the potential for any perceptual change extending beyond the local settlement context. In APP/H2265/W/24/3347410, the Inspector's assessment of effects within the setting of the KDNL focused on the experience of the KDNL from its defining landform, noting that "views towards the scarp... are not a significant factor in how the KDNL is experienced in this locality". The Inspector also recorded that existing development "separates the site both visually and functionally from the foot of the... escarpment". In this context, the Inspector's findings demonstrate that the presence or loss of intervening open land or farmland does not, in itself, define effects on the setting of the KDNL unless it alters how the designated landscape is experienced from within it. Applied to the current proposals, the LVIA demonstrates that the Site does not contribute to the experiential setting of the KDNL and that change to this localised area of farmland on the edge of settlement would not give rise to adverse effects on the setting of the KDNL. Taken together, the absence of intervisibility, the established physical separation between the Site and the KDNL, the LVIA's evidence that effects are confined to the settlement edge, and the proposed landscape design response indicate that development of the Site would not erode settlement separation or lead to coalescence between Hook Green and Meopham, and does not give rise to adverse effects on the setting or experience of the KDNL.
4.	<i>As set out above, the National Planning Policy Framework paragraph 189 requires great weight to be given to conserving and enhancing landscape and scenic beauty in National Landscapes, which have the highest status of protection in relation to landscape and scenic beauty. This requirement</i>	As set out at paragraph 3.13 of the LVIA, the KDNL was scoped out of further assessment because there is no physical, perceptual, or visual connection between the Site and receptors within the designation; this reflects both the settlement and school infrastructure that intervene and the absence of intervisibility confirmed through ZTV analysis and field work. The design has been informed by the LVIA's findings so that mitigation and enhancement measures address the receptors that do experience change locally. The Illustrative Landscape Strategy (Appendix 1) provides southern open space and layered structural planting that contain views and establishes a strong, defensible



Item	<i>Kent Downs National Landscape Response - 03/12/25</i>	TG Response
	<i>applies to any proposals to locate development within the National Landscape but also to those proposals which would be in its setting and therefore would affect the National Landscape and where the NPPF is clear that development should be sensitively located and designed to avoid or minimise adverse impacts on the National Landscape.</i>	settlement edge, integrating the development with Hook Green without extending visual or perceptual influence towards the KDNL. Accordingly, even if paragraph 189 is engaged on a “setting” basis, the combination of no intervisibility and a contained, landscape-focused edge treatment provides proportionate evidence that any adverse effects on the National Landscape are avoided or, at worst, minimised. A comparable paragraph 189 judgment was reached in APP/H2265/W/24/3347410 (Moto Hospitality, M26 Junction 2a), relating to a commercial development located approximately 8 km to the south of the Site, where part of the appeal site directly abutted the KDNL and was expressly assessed as lying within its setting. In that case, the Inspector found only “<i>limited and localised visual harm to the setting of the KDNL</i>” and confirmed the proposal “<i>would not adversely affect to any significant degree how views from or towards the scarp of the KDNL would be experienced</i>”, with “<i>no harm to the special characteristics of the views into or out of the Protected Landscape</i>”. In the context of the current proposals, where the LVIA demonstrates no intervisibility, no perceptual relationship with the KDNL, and a contained, landscape-focused design response at the settlement edge, this appeal reinforces that paragraph 189 does not preclude development and that effects on the KDNL should be judged by reference to actual change in experience, which the LVIA finds does not arise.
5.	<i>Residential development of this scale has the potential to result in adverse impacts on the nearby National Landscape as a result of increased recreational pressure and higher volumes of traffic on its network of narrow rural lanes which will threaten the landscape and scenic beauty of this protected landscape.</i>	This response is unable to comment on the flow and changes to traffic with the introduction of the Proposed Development. From a landscape perspective, the Proposed Development incorporates measures that have been informed by concerns regarding recreational activity in the context of the KDNL. The scheme delivers on-site POS and play opportunities, as shown on the Illustrative Landscape Strategy (Appendix 1), providing accessible, day-to-day recreation within the Site itself. This forms part of a landscape-led approach to managing recreational activity and movement in proximity to the development, having regard to the proximity of the KDNL. The existing PRoW extending through the Proposed Development has also been retained and integrated within the layout, maintaining pedestrian connectivity to the wider settlement and surrounding landscape to the south-west of the Site. Its incorporation within a designed landscape framework provides a legible and managed route.



Item	<i>Kent Downs National Landscape Response - 03/12/25</i>	TG Response
6.	<i>It is therefore our view that this development will have an adverse effect on the setting of the National Landscape, by virtue of its incursion into and erosion of the open land and setting of the villages of Hook Green and Meopham and altering the character of the landscape setting of the National Landscape here.</i>	The KDNL's position is noted. In this instance, however, the concern raised relates to perceived change at the settlement edge of Hook Green and Meopham rather than to an erosion of the key landscape characteristics or experiential qualities that define the setting of the Kent Downs National Landscape in this location. The setting of the KDNL here is characterised by a pattern of nucleated villages and associated settlement edges set within a working agricultural landscape, rather than by the absence of development. Settlement presence and containment are therefore intrinsic elements of the landscape context from which the KDNL is experienced. The introduction of development adjacent to an existing settlement does not, in itself, represent an erosion of the KDNL's setting where it responds to, and reinforces, this established pattern. The LVIA demonstrates that the Proposed Development is read as a contained and landscape-led extension to the south-western edge of Hook Green, with built form, open space and planting structured to maintain settlement separation, reinforce village identity and manage perceptual change. These measures ensure that the character of the surrounding landscape (and the way in which the KDNL is perceived and experienced from its setting) is not adversely altered. Accordingly, while the proposals introduce change at the local settlement edge, this change is consistent with the existing settlement-in-landscape character that defines the KDNL's setting at this location, and does not give rise to an adverse effect on the character of the landscape setting of the KDNL.

Summary and Conclusions

- 1.9. The above is intended to provide further clarification and a landscape and visual response to the comments raised by the KDNL team on behalf of Gravesham Borough Council (letter dated 03/12/2025).
- 1.10. In summary, the evidence shows the KDNL is physically and visually separate from the Site by approximately 800 m (as confirmed within the KDNL response), with Hook Green, the school infrastructure, and Wrotham Road with its tree-lined verges lying between the designation and the Site. ZTV analysis (Appendix 1) and field verification confirm no intervisibility from receptors within the KDNL, a position also acknowledged within the KDNL response. Therefore, there is no physical, visual or perceptual relationship by which change at the Site could influence how the KDNL and its setting is experienced.



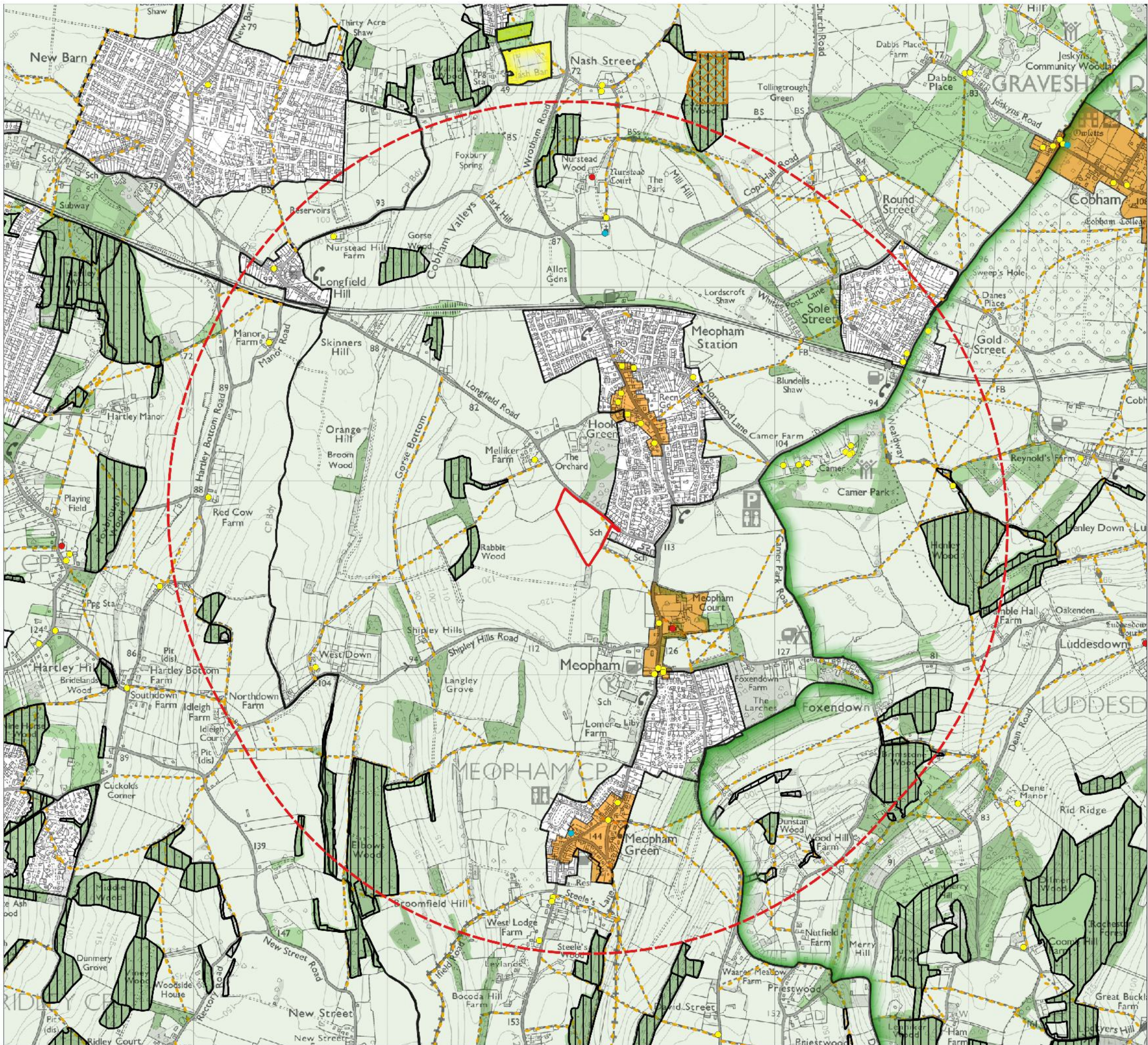
- 1.11. Where change occurs, it is limited to the landscape outside of the KDNL, located towards the south-western edge of Hook Green, with receptors to the east scoped out due to lack of visibility and the effects on the local landscape assessed as experiencing negligible adverse residual effects by Year 15 as planting establishes, as evidenced in the LVIA. The Illustrative Landscape Strategy (Appendix 1) provides southern public open space and layered structural planting to create a soft, defensible settlement edge that integrates with the existing settlement pattern and reinforces separation between Hook Green and Meopham. Taken together, this physical separation, the absence of any visual or perceptual relationship, and the proposed edge treatment mean the development at the Site would not alter the character or experience of the KDNL and, on the basis of the LVIA evidence, does not form part of its setting.
- 1.12. It is therefore our professional judgement that the Proposed Development will not have an adverse effect on the setting of the KDNL.

Yours sincerely,

Mike Berwick
BS.c (Hons), MLA, CMLI



Appendix 1 – Supporting Plans



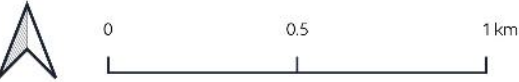
LEGEND

- Site Boundary
- 2km Study Area
- Public Rights of Way (PRoW)
- Ancient Woodland
- National Landscape Boundary
- National Forest Inventory
- England Green Belt
- CRoW Access Land
- Sites of Special Scientific Interest
- Scheduled Monuments
- Conservation Area

Listed Buildings

- I
- II*
- II

Revision	Description
-	First Issue

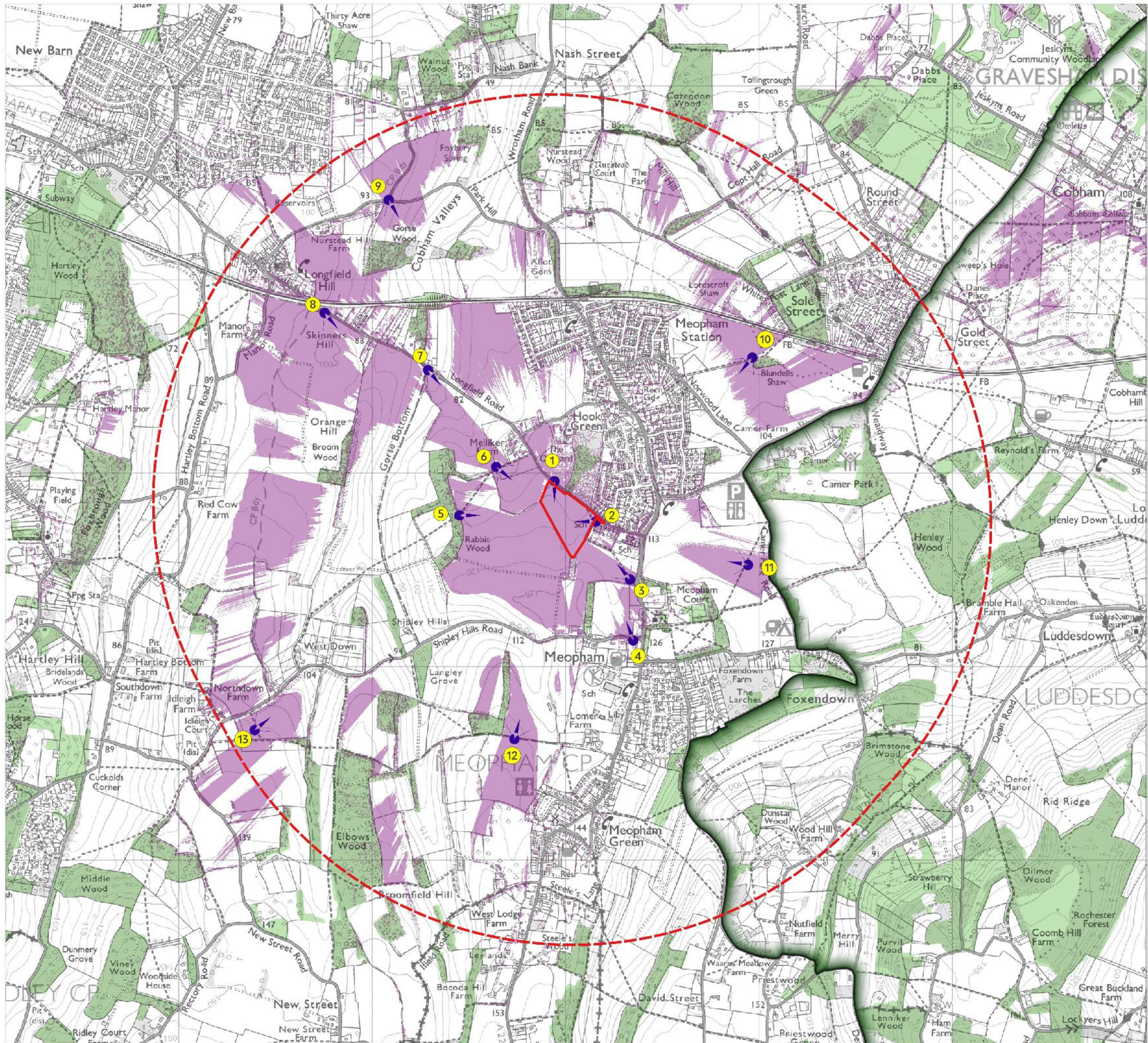


Project	Land South of Longfield Road, Meopham
Title	Plan 2: Landscape Planning Policy & Designations
Scale	1:20,000 @ A3
Drawing No.	17740_P06
Date	SEPTEMBER 2025
Checked	IJ/



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LEGEND

- Site Boundary
- 2km Study Area
- Kent Downs National Landscape extents
- National Forest Inventory
- Zone of Theoretical Visibility
- Viewpoint locations - 1-13

Notes:
The Zone of Theoretical Visibility (ZTV) illustrates the extent to which the proposed built form on site (based on a maximum height of 10.5m above ground level) is potentially visible within a 2km radius (to a 1.6m high receptor). The ZTV has been modelled using GIS computer software (QGIS) and LIDAR Composite First Return DSM 2022 2m Data, and as such, takes into account existing built form and vegetation present within the landscape surrounding the site. Field verification is required to refine the accuracy of the ZTV.



Revision	-	Description	First Issue
Project	Land South of Longfield Road, Meopham		
Title	Plan 5: Zone of Theoretical Visibility & Viewpoint Locations		
Scale	1:20,000 @ A3		
Drawing No.	17740_P03		
Date	SEPTEMBER 2025		
Checked	IJ/MB		



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Informal play area along the footpath



Internal access roads will be planted with appropriate street trees, considering species diversity, resilience and eventual sizes for their location, in addition to pedestrian character and microclimate benefits. Tree pits design to support adequate soil volumes and growing conditions for establishment and future growth. Front gardens to be defined by a suitable mix of native and non-natives shrubs, considering seasonal character and biodiversity values such as nectar-producing species



Equipped play and seating area offering a range of play and seating opportunities, considering inclusive design principles



Community orchard, planted with local orchard tree varieties set within a species-rich grassland



Existing trees and hedges to be retained

New native hedgerow along Longfield Road boundary

New native hedgerow with trees along the southern boundary, with tree planting located behind will create a strong, defensible boundary to the development

Set back development and vegetated boundary with layered hedgerows and trees to soften views and reinforce the rural transition to the open rolling countryside south-west of the Site

Existing trees and hedges to be retained



SuDS attenuation basins and swale features with planting which is tolerant of both wet and dry conditions; Close mown path with seating around the SuDS attenuation basins



Shared surfaces to prioritise pedestrian walking experience in coordination with transport engineering advice. Integrating green infrastructure seating and signage at detailed design



Informal path through public green space

Key:

- Site boundary
- Existing boundary trees/woodland retained
- New native hedgerows
- New tree planting (Street trees)
- Boundary buffer planting
- Community orchard with local orchard tree varieties
- Primary road
- Footpath
- Secondary road / Parking Court
- Shared surface / Home zone
- Gravel footpath within public green space
- Close mown path within public green space
- Species rich grass
- Private amenity lawn
- SuDS Basin with wetland meadow mix and marginal planting
- Natural play and seating elements within attenuation basin
- PROW
- Long distance view



Project	Land South of Longfield Road Meopham
Drawing Title	Illustrative Landscape Strategy
Scale	A3: NTS
Drawing No	17740/P01a
Date	September 2025
Checked	LC / MB

