Tabled Update for Item 2.1 – Pitstock Farm (ref. 24/500125/FULL)

Rodmersham Parish Council - objection

An objection was received from Rodmersham Parish Council on 08 September 2025, which is available to view in full (including the Executive Summary and Appendices) on the application website at: https://pa.midkent.gov.uk/online-

applications/applicationDetails.do?activeTab=documents&keyVal=S71D6NTYMJ100.

The main concerns raised are as follows:

- 1. Loss of Best and Most Versatile (BMV) Agricultural Land
 - Disputes that insufficient evidence has been provided to justify the use of this land over lower-grade alternatives (e.g. rooftops, brownfield sites) and therefore is contrary to the NPPF and Local Plan DM31.
- 2. Inadequate Consideration of Cumulative Impacts
 - Believe the application fails to assess cumulative effects with nearby major developments, especially Highsted Park North and South.
 - Suggests the officer's report lacks a meaningful cumulative impact assessment.
- 3. Landscape and Visual Harm
 - Concerns that the proposal would industrialise a rural valley landscape, with adverse effects
 on scenic views, rural lanes, and tranquillity, thereby harming the setting of the Kent Downs
 National Landscape and adjacent Area of High Landscape Value.
 - Concern that the proposed screening is inadequate due to topography; mitigation planting would take 15+ years to mature and still be ineffective.

4. Harm to Heritage Assets

- The construction route passes through the Rodmersham Church Street Conservation Area and directly past the Grade I listed St Nicholas Church.
- Concern that the Historic Environment Desk-Based Assessment is insufficient due to listed buildings not having been properly assessed.
- 5. Ecology and Biodiversity Concerns
 - Concerned that KCC Ecology relied on desktop assessments without site visits or seasonal surveys.
 - Concern that no assessment has been made of the development's impact on the Ramsar and SPA sites
 - Concerned with the loss of skylark breeding territories, especially given the overlap with mitigation areas for Highsted Park.
 - Biodiversity Net Gain (BNG) claims are unsubstantiated and not applicable as the application predates mandatory BNG requirements.
- 6. Public Rights of Way (PRoW) and Amenity
 - Concern that the development would severely impact PRoW ZR212 and others, reducing their recreational and visual amenity contrary to NPPF Paragraph 100 and local policies.
- 7. Highways and Traffic Safety

- Concerns that construction traffic are understated and would use narrow rural lanes unsuitable for HGVs, including routes already signed as "unsuitable for HGVs", which would impact on school routes, pedestrians, cyclists, and horse riders.
- Concern that the Parish Council's draft Highway Improvement Plan (which is not adopted by KCC Highways and not a formal local plan document) and suggestions for signage restricting HGVs are not reflected in the Officer's assessment.

8. Glint, Glare and Living Conditions

Concern that the glint and glare assessments are based on desktop studies without site
visits or resident engagement and that the visual impacts on nearby properties are severe
and long-term; mitigation is unrealistic due to topography and vegetation limitations.

9. Lack of Grid Connection Certainty

 No binding agreement with the Distribution Network Operator has been provided and therefore concerned that without a confirmed grid connection the proposal is speculative and risks blighting the land unnecessarily.

10. Lack of Community Benefit and Decommissioning Safeguards

- Alleges that there is no enforceable financial bond or plan for decommissioning and land restoration after 40 years.
- Alleges that the substation would remain in perpetuity, undermining the "temporary" nature of the scheme.

11. Procedural and Reporting Concerns

- The officer's report is alleged to contain "cut and paste" content from another application (Vigo Lane).
- The Parish Council set out a comparison between the Vigo Lane and Pitstock Farm
 proposals, highlighting differences in ALC grades, amenity baselines, and landscape and
 note the reasons for refusal of the Vigo Lane proposal. [Officer Note planning permission
 has recently been granted for the Vigo Lane scheme through the allowance of the appeal.]
- Concerns that there were inadequate site visits and over-reliance on applicant-submitted data.

Conclusion

Rodmersham Parish Council urges the Planning Committee to refuse the application on the grounds of conflicts with multiple Swale Local Plan policies, including ST1, CP4, CP7, CP8, DM3, DM20, DM24, DM26, DM28, DM31, DM32, and DM33.

Appendices

The documents appended to the objection include:

- Letter to The Prime Minister signed by 30 MPs, Lords and Baronesses relating to the protection of BMV agricultural land.
- A copy of a statement made by Claire Coutinho MP in her former role as Secretary of State for Energy Security and Net Zero relating to food security.
- A copy of appeal decision APP/E2205/W/24/3352427 with respect to land at Aldington in the area of Ashford Borough Council.