



Sevington with Finberry Parish Council

Proofs of Evidence

Authored by:

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Sevington with Finberry Parish Council - Chairman

For

CROWN/2025/0000002 Sevington Inland Border Facility

Issue 2

24th November 2025



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1 Executive Summary

1.1.1 This document presents a comprehensive review of the principal matters relevant to the proposed development, including:

- Aesthetics,
- Noise,
- Landscaping,
- Lighting,
- Footpaths and drainage,
- Archaeology,
- Traffic and litter,
- Other matters.

1.1.2 Drawing upon my expertise as Chairman of Sevington with Finberry Parish Council and as a chartered engineer with over three decades of experience in Building Services Engineering, the evidence herein is intended to provide a balanced and informed perspective on the impacts and benefits of the scheme.

1.1.3 Each section addresses specific concerns raised by myself, the community and stakeholders, supported by technical analysis and practical recommendations to ensure the integrity and sustainability of the local environment.

1.1.4 This document also considered evidence provided by Mersham Parish Council. Matters raised by Cllr Gavin Murphy can be found in Appendix H

1.1.5 The aim is to facilitate informed decision-making by presenting clear, factual, and impartial assessments of the issues at hand. The document seeks to uphold the interests of residents while promoting responsible development that respects both the heritage and future needs of Sevington with Finberry.

1.1.6 Supporting evidence referred to that is not part of the original planning submission can be found on the link below:

<https://www.dropbox.com/scl/fo/4zdvhcn4y19wja4v3bvyj/AD37pihnHUrRIN9kt6mca2Q?rlkey=sa6hg1xgg1ry2guzkshh4xvnh&st=ajyl8wd3&dl=0>



2 Personal Background

2.1 Name & Affiliations

- 2.1.1 I am Cllr Darren Coppins BEng CEng MCIBSE MASHRAE BEMP, Chairman of Sevington with Finberry Parish Council (SWFPC).
- 2.1.2 I joined Sevington with Finberry Parish Council in 2023 and became Chairman in 2024.

2.2 Qualifications & Experience

- 2.2.1 I am the founder and managing director of a small consulting engineering practice.
- 2.2.2 I have 33 years of Building Services Engineering practice experience.
- 2.2.3 I hold a Batchellor of Engineering degree with 2:1 Honors.
- 2.2.4 I am a chartered engineer with the UK Engineering Council and full member of the Chartered Institute of Building Services Engineers (CIBSE), and the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE).
- 2.2.5 I hold the ASHRAE Building Energy Modelling Professional qualification and am an independent design reviewer for the NABERS UK Design for Performance Initiative.
- 2.2.6 I am active in authoring training and technical documents for industry via CIBSE and the LETI initiative and have participated in industry panels for changes to the UK Building Regulations.
- 2.2.7 Part of my professional duties include the selection of noise attenuation equipment, providing a basic working knowledge of acoustics and sound transmission.
- 2.2.8 Any limited experience with the planning system is from engineering projects at planning stage and through commenting on applications & local policies as a councillor for Sevington with Finberry Parish Council. My opinions represent local knowledge rather than professional expertise in relation to planning policy.

2.3 Declaration

- 2.3.1 The evidence I have prepared is true and I can confirm the opinions I have provided are my true opinions.
- 2.3.2 My opinions reflect that of the Sevington with Finberry Parish Council as well as my own experiences with the site prior to becoming a councillor.



2.4 First involvement with the site & history of my interactions

- 2.4.1 The following is a brief summary and does not list each and every interaction.
- 2.4.2 I have known the site since moving adjacent to the site in 2006.
- 2.4.3 My first involvement with the development of the site was in the early 2010's in attending consultations relating to the previous development proposals.
- 2.4.4 I have been active in engaging with consultations and applications personally prior to becoming a member of the Sevington with Finberry Parish Council in 2023.
- 2.4.5 My first written involvement with the site as developed for the IBF was via email on 16th July 2020 to the consultation address provided on a leaflet - roadseuesit@dft.gov.uk and to [REDACTED] to provide a document summarising local residents concerns and highlighting positive outcomes of discussions with previous developers. No meaningful engagement resulted.
- 2.4.6 During late 2020 I raised concerns relating to the aesthetics and landscaping that was being implemented adjacent to Church Road. I was informed that it was being constructed to 19/00579/AS. On the basis that the roads, footpaths and planting did not reflect that as approved by 19/00579/AS I lodged a breach of planning with Ashford Borough Council. This led to engagement with the landscaping team and some additional planting.
- 2.4.7 Operational stage noise complaints were first made in 2021.
- 2.4.8 With noise issues continuing, a complaint was filed with Ashford Environmental Health following which there was several visits and 2 periods of noise monitoring inside my house. The visiting individual from the EHO confirmed that he could hear the low frequency noise when in the living room at my home.
- 2.4.9 I attended the first consultation for the current scheme in October 2024 where I discussed concerns and provided records of noise issues experienced.
- 2.4.10 I attended the follow up consultation on the 17th January where there appeared to be little change from the previous consultation. Noise issues were acknowledged and noted as further work to be done.
- 2.4.11 On 31st January 2025 I emailed Britney Truong at Kanda Consulting with copies to Ashford Environmental Protection, and Cllr Paul Bartlett to reiterate my concerns and encouraging constructive discussion to reach a satisfactory outcome. No further engagement occurred until the formal consultation for CROWN/2025/0000002.



3 Introduction

3.1 Purpose

- 3.1.1 This Proofs of Evidence is for CROWN/2025/0000002 Sevington Inland Border Facility.
- 3.1.2 Sevington with Finberry Parish Council recognise the importance and necessity of the function of the site and the economic benefits it brings to the area when compared with no development at the site.

3.2 Statement of Common Ground

- 3.2.1 Whilst no formal statement of common ground has been agreed, the following indicate areas where some common ground exists.
- 3.2.2 Noise - The applicant proposes an independent noise report is generated and conditioned.
- 3.2.3 Landscaping – Additional planting proposed (noted as being implemented at the time of writing).
- 3.2.4 Lighting – Reductions to light levels & baffles.
- 3.2.5 Litter – Litter pick's proposed.

3.3 Issues Addressed by this Statement of Evidence

- 3.3.1 Site aesthetics.
- 3.3.2 Noise
- 3.3.3 Landscaping
- 3.3.4 Lighting
- 3.3.5 Footpaths & Drainage
- 3.3.6 Archaeology
- 3.3.7 Traffic & Litter
- 3.3.8 Other Matters
 - 3.3.8.1 Use of Sevington in the Name
 - 3.3.8.2 CCTV
 - 3.3.8.3 Compensation



4 Proofs of Evidence

4.1 Aesthetics

4.1.1 Relevant information

4.1.1.1 Statement of Matters references: 18, 22, 23, 25

4.1.1.2 Policy references: Local Plan SP6 - Promoting high quality design / SP7 Separation of settlements / ENV3a Landscape Character and Design / ENV5 - Protecting important rural features / ENV13 Conservation and Enhancement of Heritage Assets / NPPF Section 12

4.1.1.3 Schedule of Evidence that can be found in **Appendix A**

File	Item	Relevance
Aesthetics – Photo's & Commentary.pdf	Photo's & supporting information.	Shows interface with heritage assets and examples of how buildings and boundary treatments do not follow policy.
SWFPC Survey Results.pdf	Results of local survey during the consultation phase.	To illustrate feedback received.

4.1.2 Main Points

4.1.2.1 Buildings do not consider their surroundings through style or façade treatment.

4.1.2.2 Boundary treatment on all sides uses galvanised palisade fencing and is at odds with its setting in a previously farmland site leading to the wider countryside.

4.2 Noise

4.2.1 Relevant information

4.2.1.1 Statement of Matters references: 74 & 75

4.2.1.2 Policy references: Local plan S15 - Finberry North West (Relevant paragraph 3.193) NPPF Chapter 15



4.2.1.3 Schedule of Evidence that can be found in **Appendix B**

File	Item	Relevance
Noise – Supporting information.pdf	A opinion based technical assessment of the performance of acoustic measures.	Suitability of acoustic treatment.
Refrigerated Transport – Noise.pdf	Measured noise from refrigerated trailers.	To aid understanding of how acoustic treatment needs to be improved.
The acoustic durability of timber noise barriers on Englands strategic road network.pdf	Measured performance of timber acoustic barriers.	To aid understanding of how acoustic treatment needs to be improved.
IBF Noise Records – October 2024 Redacted.pdf	Records of significant noise events.	To aid understanding of how acoustic treatment needs to be improved.
SWFPC Survey Results.pdf	Results of local survey during the consultation phase.	To illustrate feedback received.

4.2.2 Main Points

- 4.2.2.1 Noise direct from the site has been a cause for complaint from Church Road residents and users of the surrounding PROW's from the commencement of operations.
- 4.2.2.2 Road noise associated with increased HGV movements are experienced by residents of neighbouring parishes.
- 4.2.2.3 The noise issues from the site relate to tonal and low frequency noise.
- 4.2.2.4 The submitted consultation plan identifies numerous references to noise being raised as an issue. The applicant's response provided in this document in relation to noise and vibration are not supported by any of the submitted documents.



- 4.2.2.5 The submitted noise impact assessment fails to recognise or address tonal or low frequency concerns.
- 4.2.2.6 Government guidance to the NPPF highlights tonal and low frequency noise must be considered.
- 4.2.2.7 The noise report submitted for the original SDO identified that refrigerated trailers should be kept to the north of the site which is not discussed in the submitted noise impact assessment.
- 4.2.2.8 The consultation plan notes off-peak re-routing of traffic to help mitigate. Whilst this has helped, compliance during off-peak hours only is not an acceptable solution, as peak hours have been proven to occur at night.
- 4.2.2.9 My own research included in appendix B suggests that the form of acoustic barrier as used has limited effect at low frequencies.

4.3 Landscaping

4.3.1 Relevant information

- 4.3.1.1 Statement of Matters references: 18, 19, 21, 34 & 50.
- 4.3.1.2 Policy references: Local Plan SP6 - Promoting high quality design / SP7 Separation of settlements / ENV3a Landscape Character and Design / ENV5 - Protecting important rural features / ENV13 Conservation and Enhancement of Heritage Assets / NPPF Section 12 / Corporate plan 2015 Priority 4
- 4.3.1.3 Schedule of Evidence that can be found in **Appendix C**

File	Item	Relevance
Landscaping – Supporting information .pdf	Photo's & supporting information.	To highlight how landscaping prioritises the sites function over amenity & value to the area.
MASTERPLAN SHEET 1 - PL 12_004 REV C.pdf	Landscaping as approved by 19/00579/AS	Residents were informed 19/00579/AS was being followed at the time of construction.
ILLUSTRATIVE LANDSCAPE	Landscaping as approved by 19/00579/AS	Residents were informed 19/00579/AS was being



MASTERPLAN COLOURED SHEET 2 - PL 12_005 C.pdf		followed at the time of construction.
SWFPC Survey Results.pdf	Results of local survey during the consultation phase.	To illustrate feedback received.

4.3.2 Main Points

- 4.3.3 Landscaping generally does not provide the amenity and screening secured by 19/00579/AS. Some areas have been described as a no-mans land rather than a green buffer.
- 4.3.4 Where the landscaping is expected to screen the site and provide relief to the necessity to improve the buildings and boundary treatments as well as separation from the settlement of Sevington and its heritage assets, it is inadequate.
- 4.3.5 Much of the landscaping has failed due to poor implementation of planting and management plan. It is acknowledged that some landscaping is being replaced at the current time, although 5 years of growth has been lost.

4.4 Lighting

4.4.1 Relevant information

- 4.4.1.1 Statement of Matters references: 28, 33, 35, 52, 53, 76, 77,
- 4.4.1.2 Policy references: Local Plan ENV4 - Light Pollution and promoting dark skies / NPPF Paragraph 125
- 4.4.1.3 Schedule of Evidence that can be found in **Appendix D**

File	Item	Relevance
Lighting – Supporting information.pdf	Photo's & supporting information.	To illustrate performance & glare of lighting.
SWFPC Survey Results.pdf	Results of local survey during the consultation phase.	To illustrate feedback received.



4.4.2 Main Points

- 4.4.2.1 Lighting emits significant glare & direction is poorly controlled, illuminating areas outside the site including adjacent biodiversity areas and dwellings.
- 4.4.2.2 The installation does not appear to consider light pollution and dark skies.
- 4.4.2.3 The lamp columns are too tall.
- 4.4.2.4 Building attached lighting increases glare from the site. The submitted External Lighting assessment stated that this has been turned off, but as of 22nd November, building attached lighting has been observed as still in use.
- 4.4.2.5 Responses to the survey in relation to whether the proposals were adequate were mixed between the proposals being acceptable but the columns are still too tall (31%) The proposals are insufficient and more needs to be done to reduce lighting impact (28%) and the proposals represent a good solution (21%).

4.5 Footpaths & Drainage

4.5.1 Relevant Information

- 4.5.1.1 Statement of Matters references: 28, 33, 35, 52, 53, 76, 77,
- 4.5.1.2 Policy references: Local Plan ENV5 - Protecting important rural features / ENV6 - Flood Risk
- 4.5.1.3 Schedule of Evidence that can be found in **Appendix E**

File	Item	Relevance
Footpaths & Drainage – Supporting information.pdf	Photo's & supporting information.	To illustrate footpath & drainage issues.
MASTERPLAN SHEET 1 - PL 12_004 REV C.pdf	Landscaping as approved by 19/00579/AS	Residents were informed 19/00579/AS was being followed at the time of construction.
ILLUSTRATIVE LANDSCAPE MASTERPLAN COLOURED SHEET 2 - PL 12_005 C.pdf	Landscaping as approved by 19/00579/AS	Residents were informed 19/00579/AS was being followed at the time of construction.



SWFPC Survey Results.pdf	Results of local survey during the consultation phase.	To illustrate feedback received.
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4.5.2 Main Points

- 4.5.2.1 Footpaths deviate significantly from the original (AE639) and originally approved new routes within 19/00579/AS. Whilst it is recognised that the proposals as approved in 19/00579/AS would need adaptations, the deviations appear unnecessarily significant.
- 4.5.2.2 Drainage to the south west of the site has not considered the position of the existing drainage inlet when creating the footpaths. Water discharges over the footpath most of the year, which has a soft surface, making it unsuitable or difficult to traverse.
- 4.5.2.3 Drainage to the staff entrance is inadequate. During heavy rainfall events, surface water passes over the linear drain and discharges into Church Road and Sunnybank, a dwelling opposite the staff entrance.
- 4.5.2.4 Drainage to the staff entrance is poorly placed. Surface water flowing down from the staff car park runs into the footpath before reaching the drain. This regularly washes away the surface material and requires more permanent, sustainable rectification.
- 4.5.2.5 The site relies heavily on the culvert which passes under HS1 and adjacent regional railway infrastructure. This infrastructure also serves Church Road. Poor maintenance has previously resulted in flooding. Maintenance of this infrastructure, including the drainage to Church Road, should be included in the ongoing surface water management plan. Some of the drains on Church Road have become covered by growth on road verges fronting the site and are no-longer visible.

4.6 Archaeology

4.6.1 Relevant Information

- 4.6.1.1 Statement of Matters references: 39, 40, 41, 42, 43, 44,
- 4.6.1.2 Policy references: Local Plan ENV15 - Archaeology



4.6.1.3 Schedule of Evidence that can be found in **Appendix F**

File	Item	Relevance
SWFPC Survey Results.pdf	Results of local survey during the consultation phase.	To illustrate feedback received.
Appendix 3_Post Excavation Assessment May 2022_Part 1	Post Excavation report Part 1	To illustrate archaeological finds.
Appendix 3_Post Excavation Assessment May 2022_Part 2	Post Excavation report Part 2	To illustrate archaeological finds.

4.6.2 Main Points

- 4.6.2.1 At the time of the original archaeological works, residents requested opportunities to view the works and were advised it would not be possible, and nothing of interest was found.
- 4.6.2.2 The May 2022 post excavation reports submitted with the EIA scoping application OTH/2024/2051 identified locally and regionally significant finds.
- 4.6.2.3 Information boards are proposed to AE639 to the east of the site in the parish of Mersham but do not appear to fully consider the finds.
- 4.6.2.4 Information boards should be placed at strategic points around the site providing information relating to the archaeology, including the areas in the parish of Sevington. This was supported by 70% of the survey respondents.
- 4.6.2.5 The authoring of a paper, as recommended by the post excavation report, should be pursued.

4.7 Traffic & Litter

4.7.1 Main Points

- 4.7.1.1 Statement of Matters references:
- 4.7.1.2 Policy references:
- 4.7.1.3 Schedule of Evidence that can be found in **Appendix G**



File	Item	Relevance
Traffic & Litter – Supporting information.pdf	Photo's & supporting information.	To illustrate traffic & litter issues.
SWFPC Survey Results.pdf	Results of local survey during the consultation phase.	To illustrate feedback received.

4.7.2 Main Points:

- 4.7.2.1 Reports of significant congestion on unsignalled entrances on the part signalled J10A due to the high number of HGV's using the junction.
- 4.7.2.2 Reports of near misses and road traffic accidents with HGV's crossing lanes without notice – potentially due to poor signage.
- 4.7.2.3 HGV's attempting to access the IBF via Chruch Road & other country lanes cause damage and disruption to residents. The site is partially visible from the Church Road junction with the A2070.
- 4.7.2.4 Littering along the A2070, particularly around the entrance to the site has become problematic, particularly discarded human waste in bottles. This has improved recently and the operator's commitment to litter picks acknowledged.

4.8 Other matters

4.8.1 Main Points:

- 4.8.1.1 Statement of Matters references: N/A
- 4.8.1.2 Policy references: N/A

File	Item	Relevance
SWFPC Survey Results.pdf	Results of local survey during the consultation phase.	To illustrate feedback received.

4.8.2 Main Points:

- 4.8.2.1 The survey returned the following results in relation to other matters:

- a) CCTV cameras are intrusive and should not cover public areas (24%)



- b) CCTV cameras should not be seen from public areas (24%)
- c) The site should not be called 'Sevington IBF' (31%)
- d) Residents should be compensated for lack of consultation & significant disturbance during construction (Noisy works 6am to 8pm 6 days a week plus Sunday mornings) (29%)

End of report.