



Sevington with Finberry Parish Council

Sevington with Finberry Parish Council

&

Mersham Parish Council

Statement of Case

CROWN/2025/0000002 Sevington Inland Border Facility

Issue 3

24th November 2025



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1 Executive Summary

1.1 Purpose

This document provides the statement of case for matters raised by Sevington with Finberry Parish Council and Mersham Parish Council.

This document was compiled with limited time and resource. Please consider that it may therefore contain errors which should be referred back to the author as appropriate.

1.2 Issues

The following form the issues raised in this document:

- a) Aesthetics (Separate from Landscaping)
- b) Noise
- c) Landscaping
- d) Lighting
- e) Footpaths & drainage
- f) Archaeology
- g) Traffic & Litter
- h) Other Matters

1.3 Common Ground

Some areas of common ground (informal) are present in the following areas:

- a) Noise
- b) Landscaping
- c) Lighting
- d) Litter

1.4 Suggested Planning Conditions

The following suggested summary planning conditions are considered essential components where issues are not resolved through changes to the submitted documentation. The following does not represent suggested wording or detail.

- a) Aesthetics
 - (1) Conditions relating to the observation of the unsuitable aesthetics of buildings and boundary treatment in relation to the sites connection with historic assets and the countryside and the remediation of such to address issues raised. Local Parish Councils are to be included in consultation for the proposed remediations.
- b) Noise
 - (1) An independent noise assessment is undertaken with the brief incorporating requirements of local parish councils and of residents with the intent to provide adequate attenuation of tonal and low frequency noise. Where an independent assessment shows remediation is technically not possible with a fully operational site, a mechanism for supporting local residents financially through compensation must be included. Levels of compensation should consider re-location costs and improving the acoustic performance of



dwelling through expert advice subject to listed buildings consent as required.

c) Landscaping

- (1) The final agreed extent of landscaping shall need to consider any additional landscaping necessary to mitigate items not resolved under aesthetics above.
- (2) The provision of a revised, detailed Landscaping & Biodiversity Management Plan prepared by qualified professionals, including native species lists, planting densities, phasing, success criteria, and a five-year maintenance and replacement schedule (with defined minimum survival rates).

d) Lighting

- (1) The lighting impact assessment is updated to provide greater detail on compliance with policy and incorporating a strategy that reduces operational hours, implements directional lighting, dimming, and motion-sensitive zones, and establishes measurable limits on light spill and sky-glow. Night-time lighting should correspond only to active operational areas. Where building attached lighting is not adapted to reduce glare, it should be removed.

e) Footpaths & drainage

- (1) A review of site drainage, particularly relating to the staff entrance, the south west corner of the site and the use of tankers, is required.
- (2) A review of the footpath maintenance and an ongoing commitment is required.
- (3) Conditioning the re-introduction of the original route of AE639 between Sevington Church and Mersham once the site is no-longer required for its current purpose.
- (4) Improvements to the remainder of AE639 to Mersham.

f) Archaeology

- (5) Provision of additional information boards as appropriate for the Archaeological finds & funding of the authoring of a paper as recommended by the post excavation report to provide recognition to the early settlements and artifacts found on the site.

g) Traffic & Litter

- (1) A robust traffic assessment is undertaken scrutinising the impact the IBF has placed on local roads with mitigations, considering the potential situation with the site operating to capacity. The assessment should include the suitability of partial traffic control on junction 10A, signage and enforcement. Contributions to implementing recommendations also need consideration.
- (2) The use of the site entrance on Kingsford Street for tankers and any other HGV's should be prohibited to prevent unnecessary HGV movements through the village of Mersham.
- (3) The site should provide suitable facilities for users to dispose of waste from the cab.
- (4) The operator to provide regular litter picking and regular reviews to ensure the areas covered are adequate.



- (5) Provision of additional dog/general litter bins on the footpaths around the site with an agreed ongoing emptying & repair/maintenance regime.

h) Other Matters

- (1) Consideration to be given to the re-naming of the site and returning the name Sevington to the settlement.
- (2) Future changes and adaptations to CCTV on or near the perimeter to be subject to consultation with the local community & Parish Councils.
- (3) Quarterly public reports for at least two years post-transfer on landscaping, traffic compliance, lighting, noise, and litter control.
- (4) Establishment of a Community Liaison Group with quarterly meetings including Local Parish Council representatives to ensure issues are addressed collaboratively. The liaison representatives from the IBF should include suitable decision-making site based management representatives and not an appointed 3rd party company. After two years, the frequency of these meetings can be reviewed, but should continue at a rate of at least one per year.
- (5) A defined enforcement mechanism, including remedial obligations and penalties for non-compliance with any agreed milestones or environmental targets.



2 Introduction

2.1 Purpose

This document provides the statement of case for matters raised by Sevington with Finberry Parish Council and Mersham Parish Council.

It has been authored by Cllr Darren Coppins of Sevington with Finberry Parish Council with input from Cllr Gavin Murphy of Mersham Parish Council.

2.2 Impacts on Sevington

- Loss of setting to the numerous historic assets including the Grade 1 listed St Marys Church has been increased due to poor aesthetics, boundary treatment, lack of high quality landscaping separation and 'hijacking' of the name Sevington.
- Loss of separation of settlements.
- Noise intrusion impacting local amenity with tonal and low frequency noise significantly affecting residents quality of life.
- Light intrusion into homes and gardens, degradation of dark-sky conditions and concerns for impact to local biodiversity with 24/7 light.
- Road safety risks with HGV's on narrow rural lanes.
- Biohazard risks to the community from the nature of items discarded from HGV's.
- Harm from drainage design and maintenance issues.

2.3 Impacts on Mersham

- Loss of rural character and countryside amenity for residents and users of public rights of way.
- Light intrusion into homes and gardens, and degradation of dark-sky conditions.
- Continuous noise from site operations, HGVs, and refrigerated units.
- Road safety and congestion risks on narrow rural lanes and at Junction 10A.
- Environmental harm from unmanaged surface water, litter accumulation, and failed planting.



3 Statement of Case

3.1 Site Aesthetics

3.1.1 Relevant references

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

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

Evidence reference:

- Documentation referenced within Proofs of Evidence & Appendix A

3.1.2 Matters as raised by Sevington with Finberry Parish Council during consultation:

The site does not blend into its surroundings, with comments received comparing it to living next to a prison. The metal palisade fencing, temporary nature of the buildings and minimal green screening give the site a temporary aesthetic which is unfit for retention.

Views of the site from the A2070 have been cited as much worse than expected.

The staff entrance, off a country lane in a historic area of Sevington that leads to numerous listed buildings is extremely poor and not in keeping with its surroundings.

Fencing facing countryside views is poor and at odds with its setting.

Many of the buildings as currently designed and proposed for permanent permission do not meet the requirements of planning policy, both local and national, and would not be acceptable if proposed for a new development. The site must improve its interface with its surrounding environment through a combination of improved building aesthetics, screening, improved entrances and changes to the perimeter fencing.

These improvements will help the site to blend better with its surroundings and provide a better working environment for those employed at the site.

3.1.3 Matters raised by Mersham Parish Council:

Perimeter fencing adjacent to public footpaths, bridleways, and rights of way is visually oppressive and resembles a secure compound rather than a facility integrated into the rural landscape. This has degraded the amenity of routes used daily by residents.



Large areas of the IBF appear underused while the site continues to operate at extended hours. The current scale and 24-hour operating profile cause community impacts that were never envisaged at approval.

3.1.4 Potential mitigation measures – Site entrance

The site entrance is one of the more inappropriate additions close to historic assets in the settlement of Sevington and requires significant softening. It is a private entrance, and its appearance can reflect that of other private entrances along Church Road, with fittings specified appropriately and as necessary for its purpose.

Example mitigations:

- a) Re-location of the staff entrance to the disused second entrance off the A2070 with the existing entrance returned to its original state.
- b) Move the secure line towards the car park or to the pedestrian entrance from the car park to the facility. The existing physical line & gates to be replaced with a brick wall (in-keeping with neighbouring Court Lodge) or timber fencing, and rising arm barriers, with improved planting.
- c) Replacement of the secure automated gate with a suitable solid gate more aesthetically suited to the area, with a timber or brick (brick preferred as above) visual barrier to the sides at a suitable height and distance to mask the palisade fencing and razor tops whilst maintaining security.

3.1.5 Potential mitigation measures – Palisade fencing to public interfaces

As part of the solution, we would question how many events have occurred that have justified the necessity for the razor top to the palisade fence.

Example mitigations:

- a) Boundary treatment replaced with solid timber fencing and the secure fencing moved inward, or footpaths re-located, to allow a secure fence line to be established behind. The fence shall be of a suitable height to obscure the security fence from view.
- b) Alternative design of boundary fence which may deliver the required security with appropriate aesthetics.
- c) Change the colour of the palisade fence to a dark green (example), provide planting in front and/or behind to soften the visual intrusion of the palisade fencing & review the necessity for the razor tops.

3.1.6 Potential mitigation measures – Views into the site & buildings

Mitigation measures can address the buildings themselves, some of which have a temporary nature, none of which have architectural merit, or addressing the views into the site, or a combination of the two.



Mitigation is particularly important for views that include the historic area of Sevington with its Grade I listed church and numerous Grade II listed assets, but also important for views from the A2070, from footpaths and from a distance in any direction.

Of note is the now re-planted viewing corridor between Sevington church and Mersham church. Whilst this is positive, its aesthetic value is largely lost due to the nature of the surrounding fencing and buildings.

Example mitigations:

- a) Improvements to the buildings either via screening or over-cladding, identifying opportunities for artwork, planting & other forms of visual interest. This option is likely to improve experiences of users, workers, residents and passers-by.
- b) Greater massing to earth bunds, greater density to landscape planting, consideration to some evergreen species.
- c) Tall fencing similar to the acoustic barriers strategically positioned to obstruct views.

3.1.7 Potential mitigation measures – Separation of settlements

The development and views into the development along with potential for the development of land east of highfield lane represent a failure to observe separation of settlements and promote further development resulting in loss of separation.

Proposed mitigations:

- a) Observation of the proposed Mersham Wall in respect of the land to the east of Highfield Lane via appropriate long term enforcement and protection via planning conditions.
- b) Measures to prevent development of the remaining green areas of Sevington must be incorporated into local planning policy. Previous attempts to protect the remaining historic context have failed, resulting in inappropriate developments being permitted by appeal with the IBF cited in context.

3.2 Noise

Statement of Matters references: 74 & 75

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

Evidence reference:

- Documentation referenced within Proofs of Evidence & Appendix B



3.2.1 Matters as raised by Sevington with Finberry Parish Council during consultation:

Local residents have frequently reported noise issues to the Parish Council, some members of which live near to the site and experience the noise issues first hand.

General noise, tonal noise (humming, repeated sounding of horns, reversing sounders) and Low Frequency Noise (LFN) have been reported with some residents suffering impact to health and disturbed sleep. The complaints were supported by the local EHO following noise monitoring in two dwellings near the site.

The movement of lorries via an exit road between the acoustic fence and buildings has also been raised as a specific issue, resulting in noise reflecting off the buildings towards Church Road and the low frequency thrum of HGV's accelerating up the hill being heard inside houses.

Some parts of the site feature no acoustic barriers to residential property.

The noise report as submitted makes no consideration to the detailed assessment of tonal issues that have been raised. It is significantly less robust than the noise report as submitted for the SDO, which highlighted risks associated with some of the issues that local residents are reporting (such as refrigerated trailers kept to the north of the site). It also makes no reference to the operational changes that have been made which we are aware has had some beneficial impact during periods of lower operational demand.

The implemented acoustic strategy is not fit for purpose, with timber acoustic fencing providing very little attenuation at lower frequencies.

An independent noise impact assessment should be sought that considers all complaints made, with the recommendations implemented as part of any permission granted.

3.2.1 Matters raised by Mersham Parish Council:

There is sustained, intrusive noise from on-site operations, HGV movements, and refrigerated vehicles operating overnight. These disturbances affect residents across Mersham and neighbouring parishes and have become one of the most persistent quality-of-life issues. Robust noise mitigation measures are urgently required.

3.2.2 Additional supporting evidence - Suitability of the sound barriers

Refer to Proofs of Evidence Appendix C

3.2.3 Additional supporting evidence - Suitability of the noise impact assessment

Refer to Proofs of Evidence Appendix C



3.2.4 Potential mitigation measures

The permanent facility must function as necessary whilst operating in harmony with its neighbours. Noise nuisance from the site must be managed effectively with an emphasis on mitigation through location of functions, routing of traffic through the site and effective attenuation measures both at noise sources and at the operational perimeter.

Example mitigation measures:

- a) Permanent routing of HGV's away from the site road nearest church road that passes between the reflective barrier and the buildings.
- b) Functions requiring refrigerated trailer operation are located to the north of the site.
- c) Noise is attenuated at source, such as by open fronted 'hangars' to attenuate refrigerated trailer noise.
- d) Barriers are upgraded for effective low frequency control.
- e) Any form of tonal noise emission is attenuated or maintained a suitable distance from any residential dwelling.
- f) Consideration of noise issues are extended beyond the site boundary to include impact to Mersham from HGV movements & use of low noise road surfaces.

Due to the complex nature of noise mitigation, we believe it will be necessary for an independent noise impact assessment to be commissioned. The assessment must be undertaken by a consultant agreed by all parties to perform to a brief developed by all parties.

Subsequent monitoring must include a strategy for identifying and rectifying low frequency and tonal noise emissions.

Where the above two items are conditioned, it shall also need to be observed within that condition that the site shall continue to implement and improve operational mitigation of noise issues for local residents.

Where remediation is proven to be not possible, compensation for local residents must be provided to cover costs of re-location or improvement of acoustics within dwellings and the listed building consents & constraints as appropriate.

3.3 Landscaping

Statement of Matters references: 18, 19, 21, 34 & 50.

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

Evidence reference:

- Documentation referenced within Proofs of Evidence & Appendix C



3.3.1 Matters as raised by Sevington with Finberry Parish Council during consultation:

Landscaping to the site had received planning approval in 2019 (19/00579/AS) following public engagement and consultations. It was understood that the IBF would retain the approved landscaping.

Whilst the scheme has retained the areas of the landscaping, the planting, layout and accessibility is fundamentally altered and has left an extremely underwhelming aesthetic.

Poor maintenance has resulted in the death of planting that should now be established.

Proposals within the submission make some positive contributions to rectifying the landscaping with more mature planting and increased screening.

The survey responses highlight that the proposals fall short of what should be provided and that topsoil quality issues have not been addressed as part of the submitted documents.

It is understood that open landscapes are desired for security reasons, but consideration should be given to increasing planting to more effectively screen the site.

3.3.2 Matters raised by Mersham Parish Council:

The tree belt and screening shown in the original permission have largely failed to establish. Many planted trees have died or been left unmaintained. This has left the village visually exposed to the IBF and deprived the site of the intended biodiversity and landscape benefits.

The absence of a robust, cultivated buffer reduces acoustic screening and wildlife connectivity.

3.3.3 Potential mitigation measures

The requirements for open, unplanted areas are desired for improved security, this should be challenged and landscaping that achieves effective screening of the site should be implemented.

Some residents were promised separate consultation with respect to landscaping that affected them. This did not happen.

Example mitigation measures.

- a) Secure lines are re-considered, permitting landscaped areas to perform to their required duties.
- b) Opening some landscaped areas for improved footpath routes as per the 2019 proposals.
- c) Detailed consultation with local residents on the landscaping proposals.
- d) A revised, detailed Landscaping & Biodiversity Management Plan prepared by qualified professionals, including native species lists, planting densities, phasing,



success criteria, and a five-year maintenance and replacement schedule (with defined minimum survival rates).

- e) A minimum buffer width to be secured in planning, with habitat creation (trees, scrub, wildflower margins) and a long-term covenant to ensure delivery and maintenance.
- f) The well documented and discussed Mersham Village Wall: This important historic boundary must be formally recognised as a demarcated and protected feature in the planning documentation. Its maintenance, preservation, and inclusion within the official planning framework should be mandated and legally enforceable. Any work within its vicinity should be undertaken only after consultation with the Parish Council and relevant heritage officers, and its long-term management enshrined in law as part of the IBF's planning conditions.
- g) The remaining historic setting of Sevington should be protected through more appropriate planning policy. Previous attempt via HOU5 have been proven inadequate following the recent appeal approval for a commercial site on Church Road, with the appeal citing the nature of the IBF in relation to character of the area.

3.4 Lighting

Statement of Matters references: 28, 33, 35, 52, 53, 76, 77,

Policy references: Local Plan ENV4 - Light Pollution and promoting dark skies / NPPF Paragraph 125

Evidence reference:

- Images within Proofs of Evidence Appendix D

3.4.1 Matters as raised by Sevington with Finberry Parish Council during consultation:

The lighting design for the site results in significant sideways and upward spread of light that travels well beyond the site boundaries. Areas protected during the construction works for biodiversity value are now flooded with light 24/7 as a result.

Lighting has also been added indiscriminately to buildings, increasing glare, resulting in a significant impact to both the night sky and views towards Ashford from surrounding villages.

It is noted that the proposals recommend baffles, dimming and operational isolation of lights as possible. The report notes that building attached lighting has been turned off, which does not appear to be the case in all locations, and should be removed to prevent its re-use.

Responses to the survey 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%).



3.4.2 Matters raised by Mersham Parish Council:

The facility is extensively floodlit across its whole footprint nightly. Our observations indicate the site is rarely fully operational, yet the lighting remains constant, producing significant sky-glow and intruding on residential amenity and nocturnal wildlife.

3.4.3 Potential mitigation measures

Example mitigation measures.

The lighting report dated June 2025 as submitted proposes the installation of baffles to the light fittings to reduce glare, non-use of building attached lighting and operational changes including reduced light levels in some areas. Whilst this is supported, it is unclear whether these measures will result in an acceptable solution.

- a) The proposals need greater detail, including baffle design and predicted before and after light spread and glare. Where the proposals are proven inadequate, further mitigations should be explored.
- b) The overall effects of reduced light levels need to be quantified both in terms of effect to the wider views, and to how this strategy will be affected if the site's use is increased.
- c) A Lighting Strategy that reduces lighting operational hours, implements directional lighting, dimming, and motion-sensitive zones, and establishes measurable limits on light spill and sky-glow. Night-time lighting should correspond only to active operational areas.

3.5 Footpaths & Drainage

Statement of Matters references: 28, 33, 35, 52, 53, 76, 77,

Policy references: Local Plan ENV5 - Protecting important rural features / ENV6 - Flood Risk

Evidence reference:

- Images within Proofs of Evidence Appendix E

3.5.1 Matters as raised by Sevington with Finberry Parish Council during consultation:

Footpaths have been adapted significantly from the proposals of the original approved planning for the site in 2019.

Opportunities to re-introduce some of the original and proposed routes, particularly the link between Sevington Church and Mersham Church, should be considered. If



this is not possible during the sites current use, it should be conditioned to be re-introduced should the site be decommissioned or its use changed.

Respondents to the survey report poor maintenance of the footpaths, dog faecies and poor drainage. Dog waste bins would be beneficial. Of note is poor drainage design to the site staff entrance which results in surface water flowing down and out of the site from the staff entrance. Some of the water enters Church Road and some enters the footpath, washing away the surface material. A permanent solution to drainage issues is required and not addressed by this submission.

3.5.2 Matters raised by Mersham Parish Council:

We are deeply concerned by the persistent movement of large tanker vehicles through Mersham village, apparently connected to failures in pumping stations and overflow operations at the IBF.

3.5.3 Potential mitigation measures

- a) Improved maintenance to damaged surfaces.
- b) Review necessity for exclusion of the public from all landscaped areas.
- c) Condition relating to the re-instatement of footpath AE639 to its original route once the site's purpose is no-longer required.
- d) Provision of additional general and dog waste bins and regular emptying of the same.
- e) Additional drainage to the staff entrance to mitigate run-off during high rainfall events to the footpath causing damage and across Church Road into Sunnybank residence.
- f) Remaining responsible for ensuring maintenance of both existing and new drainage to Church Road and the culvert is carried out to reduce the risk of flooding from the site.
- g) Any flood-water or pumping operations must take place solely within the IBF footprint, with full environmental safeguards and independent oversight.

3.6 Archaeology

Statement of Matters references: 39, 40, 41, 42, 43, 44,

Policy references: Local Plan ENV15 - Archaeology

Evidence reference:

- Documentation referenced within Proofs of Evidence & Appendix F



3.6.1 Matters as raised by Sevington with Finberry Parish Council during consultation:

Archaeology information boards are proposed to the east of the site in the Parish of Mersham.

The post excavation assessment (May 2022) highlights significant findings in the Sevington area of the site. We therefore request that information boards relating to the findings are placed at more locations than currently proposed, such as on the footpaths near to the site entrance, Sevington Church and the footpath junction north of Bridge Cottage. The contents of the boards should be approved by the local Parish Councils and relate to findings as appropriate at each location.

We would also encourage the writing of a formal paper recognising the findings, which is recommended within the post excavation report.

3.6.2 Additional supporting evidence

Refer to Appendix F of the Proofs of Evidence

3.6.3 Potential mitigation measures

- a) Information boards should be strategically placed around the site in the Sevington area. Currently, information boards are only proposed to the east of the site.
- b) Contents and locations to be approved by the local parish councils.
- c) Pursue recommendations of the post excavation assessment recognising the significance of the findings through a formal paper.



3.7 Traffic & Litter

Statement of Matters references:

Policy references:

Evidence reference:

- Documentation referenced within Proofs of Evidence & Appendix G

3.7.1 Matters as raised by Sevington with Finberry Parish Council during consultation:

The increased HGV movements have resulted in significant increases in litter and congestion issues on local roads.

The functioning of Junction 10A must be scrutinised. The junction is partially traffic light controlled & numerous complaints have been received of significant congestion on non-controlled entry points due to significant consecutive HGV's using the junction.

Reports of increased road traffic accidents due to HGV's crossing lanes without notice needs investigation and resolution, possibly through more informative signage at motorway exits and on leaving the IBF.

The survey highlights a regular complaint to the council of significant littering along the A2070 and discarded bottles of urine around the site entrance. This suggests that there are no or inadequate facilities for the users of the site to dispose of such waste. The operator(s) of the site must take responsibility for the litter that their operation causes and ensure that there are end of trip facilities that are suitable for users of the site, which includes dealing with end of trip waste. For example, the provision of purpose made bins that can be used from the cab could significantly reduce this issue and should be implemented as part of this application to reduce litter and health risk to the local community.

There are continued wrong turns resulting in HGV's becoming stuck and causing damage to vehicles and property, along country lanes. This specifically relates to Church Road and Cheeseman's Green Lane within Sevington area. Width restrictions and signage has done little to resolve and a more cohesive strategy, such as further improvements to signage and obscuring the staff entrance, which presents aesthetically as an entrance to the site from the A2070.

3.7.2 Matters raised by Mersham Parish Council:

Commuter traffic through Junction 10A and into Junction 10 is being increasingly disrupted by the high volume of HGVs entering and exiting the IBF under normal service conditions. The congestion, particularly during morning and evening peaks, is creating extended delays for local residents and commuters.



There remains a considerable litter problem around the IBF perimeter, affecting pedestrian areas, entrance roads, and adjoining countryside. Windblown litter from the parking and holding areas is spreading into surrounding hedgerows and shrubbery, creating an unsightly and unmanaged mess. This requires ongoing and active maintenance by the site's management authority to protect both the environment and visual amenity.

3.7.3 Potential mitigation measures

- a) A robust traffic assessment is undertaken scrutinising the impact the IBF has placed on local roads with mitigations, considering the potential situation with the site operating to capacity. The assessment should include the suitability of partial traffic control on junction 10A, signage and enforcement. Contributions to implementing recommendations also need consideration.
- b) The use of the site entrance off Kingsford Street for tankers and any other HGV's is prohibited.
- c) The site provides suitable facilities for visitors to dispose of their waste. This would be from suitable bins accessible from the cab.
- d) The operator undertakes regular litter picks, with minimum coverage along both sides of the A2070 between Church Road & Junction 10A.
- e) The operator monitors litter issues and adjusts coverage accordingly.

3.8 Other matters

Statement of Matters references: N/A

Policy references: N/A

Evidence reference:

- Images within Proofs of Evidence Appendix H
- Documentation referenced within Proofs of Evidence Appendix H

3.8.1 Other matters as raised by Sevington with Finberry Parish Council during consultation:

Survey responses also raised the following issues:

- 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%)



3.8.2 Additional supporting evidence

Refer to Appendix H of the Proofs of Evidence

3.8.3 Potential mitigation measures

The CCTV cameras are understood to be an essential part of the site security and they have been adapted and increased over the life of the site. It is recognised that where cameras were objected to, they have been removed, such as the camera erected to the west of the site adjacent to Church Road which would have been intrusive to local residents.

Example mitigation:

- a) Future camera's that are close to public areas are consulted prior to installation and any appropriate masking requested is implemented.
- b) Existing camera's on the site boundary are checked to ensure that their field of view cannot include nearby private property.

The site name as 'Sevington' IBF has generated significant bad feeling with local residents. This was raised as part of the consultations for the previous development, which changed its name from Sevington Park to Stour Park to respect requests that Sevington remains associated with the historic settlement. Observing any public consultation process during the original construction would have enabled this to be mitigated.

Example mitigation:

- a) Implement plans to change the name of the site (to Ashford IBF or Kent IBF as examples) as part of a rebranding exercise that also reflects its move from a temporary facility to an established, permanent facility.
- b) The name change to be consulted to arrive at a name that meets the best needs of all stakeholders.

3.9 Ongoing site operation & Compliance

The following is also considered essential components of any conditions in respect of operational commitments:

- a) Quarterly public reports for at least two years post-transfer on landscaping, traffic compliance, lighting, noise, and litter control.
- b) Establishment of a Community Liaison Group with quarterly meetings (to commence with) including Local Parish Council representatives to ensure issues are addressed collaboratively. The liaison representatives from the IBF should include suitable decision making site based management representatives and not an appointed 3rd party representative. After two years, the frequency of these meetings can be reviewed, but should continue at a rate of at least one per year.
- c) A defined enforcement mechanism, including remedial obligations and penalties for non-compliance with any agreed milestones or environmental targets.



End of report.