

Mersham Parish Council — Commentary on the Inland Border Facility (IBF)

To: Ashford Borough Council Planning Department

From: Mersham Parish Council

Contact: Gavin Murphy, Chairman

Date: 10 November 2025

Dear Members of the Planning Committee,

On behalf of Mersham Parish Council, I write to submit a formal commentary on the current Inland Border Facility (IBF) located approximately 1.5 miles from our village. This is not an objection to the principle of the facility; rather, it sets out detailed, evidence-based concerns about how several original planning conditions have not been met, the resulting local impacts, and the specific measures we believe must be required, guaranteed, and enforced as the site transitions to Ashford management and moves into its next planning phase.

Summary of key concerns

1. Failure to deliver and maintain the green buffer / rewilding

- 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.

2. Perimeter treatment and public realm impact

- 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.

3. Light pollution and unnecessary 24-hour illumination

- 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.

4. Traffic, HGVs and tanker activity through the village

- **Increased traffic and associated noise:** 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.
- **Tanker routing through Mersham:** 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. These tankers queue and idle at the bottom of Kingsford Street—roads entirely unsuited for such vehicles—causing danger, disruption, and environmental risk. We regard this as a potential biohazard and request that Ashford Borough Council urgently investigate and bring this practice to an end without delay.

5. Scale and intensity (over-design / under-use)

- 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.

6. Environmental management and litter

- 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.

7. Noise pollution and disturbance

- 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.

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.

Requested actions and planning conditions

1. Buffer and rewilding scheme (mandatory delivery and maintenance)

- 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).
- 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.
- **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.

2. Boundary treatment redesign

- Replace or suitably screen the existing high, prison-style fencing adjacent to public routes with an appropriate boundary solution—such as visually screened fencing, planted bunds, or other softened edge treatments—compatible with security requirements but reducing visual and acoustic impact.
- **Noise mitigation extension:** Noise mitigation measures must extend beyond the IBF perimeter to include the intersection of the M20 and Station Road in Smeeth, where HGV acceleration and braking from Junction 10A create excessive and prolonged disturbance. The low-noise surface currently in place along this stretch of the M20 also requires review, maintenance, and proper management to ensure it performs to specification.

3. Lighting reduction and control plan

- A Lighting 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.

4. Traffic management and routing enforcement

- A robust Traffic Management Plan requiring dedicated HGV routing to and from the IBF, clear signage, enforcement mechanisms, and prohibition of tanker and HGV access through Mersham village.
- Any flood-water or pumping operations must take place solely within the IBF footprint, with full environmental safeguards and independent oversight.

5. Operational hours and intensity review

- A formal review of the site's hours of operation with the aim of restricting night-time use to essential functions only. Any continued 24-hour operations must be justified, limited, and subject to review.

6. Drainage, litter, and pollution control

- An independent drainage audit and clear plan to prevent off-site impacts, along with a dedicated litter management programme with regular collection, perimeter cleaning, and quarterly environmental audits by the site operator.

7. Monitoring, reporting, and community liaison

- Quarterly public reports for at least two years post-transfer on landscaping, traffic compliance, lighting, noise, and litter control.
- Establishment of a Community Liaison Group including Mersham Parish Council representatives to ensure issues are addressed collaboratively.

8. Enforcement and penalties

- A defined enforcement mechanism, including remedial obligations and penalties for non-compliance with any agreed milestones or environmental targets.

9. Noise pollution control and mitigation

- A comprehensive acoustic assessment of the entire IBF site must be conducted by independent specialists. This should include all operational

sources of noise—HGV movements, engine idling, reversing alarms, plant equipment, and refrigerated vehicles operating after hours.

- A robust mitigation strategy must then be implemented, including but not limited to: installation of noise barriers or bunds, operational restrictions on overnight idling, low-noise reversing alarms, and site layout adjustments to reduce propagation toward residential areas.
- Continuous monitoring should be established, with regular public reporting and clear thresholds triggering mandatory corrective action.
- **Note:** Mersham Parish Council acknowledges that certain matters—such as the M20 noise surface and motorway acceleration noise—fall outside the direct remit of Ashford Borough Council. However, these remain integral to the environmental context of the IBF and must therefore be actively coordinated with National Highways, Kent County Council, and other responsible agencies as part of the planning delivery process.

Conclusion

Mersham Parish Council recognises the strategic importance of the IBF but remains seriously concerned about the failure to implement the agreed mitigation measures that formed the basis for its approval. The continued lighting, noise, litter, and traffic impacts are damaging local amenity, safety, and the environment.

We therefore ask Ashford Borough Council to ensure that the above measures—particularly those relating to buffer planting, fencing, lighting, noise, and tanker routing—are made binding, enforceable conditions of any ongoing or future planning consent for the IBF.

We welcome the opportunity to meet with Council officers and the site's operators to develop workable and lasting solutions for the benefit of both the community and the facility.

Yours sincerely,

Gavin Murphy

Chairman, Mersham Parish Council