

CPRE Kent Responses and comments on selected points of the Statement of Matters ( SoM) which may assist the Inquiry to address these issues.

Christine Drury, chair of CPRE Ashford.

SoM 13	<p>In stating that this is a new planning application can the Inquiry also cover how some aspects of the existing temporary permission can be remediated – in particular the reinstatement of hedges to the rear of the properties also Kingsford Street, which were damaged by ground works in the adjacent land to the east of Highfield Lane which is under the Applicant's ownership- (Sevington East)</p>
SoM no 14 and 15	<p>The scope needs to include screening the site to reduce light and noise impacts on the surrounding rural environment – i.e boundary treatments within or immediately adjacent to the redline boundary - whether this is by quick growing trees or high solid fencing. Work has been done to mitigate impacts on the properties within Sevington village . There has been no equivalent attention to the impacts on the land to the north ( in the KDNL setting) or the fields and lanes eastwards towards Mersham. Also there is the “failed bund” needing enhancement and maintenance immediately to the south east of Sevington West and at the north west boundary of in Sevington East adjacent to Highfield Lane.</p> <p>Perhaps a boundary focus would help to identify the appropriate solutions to successfully screen the site operations visually and by choice of screening to reduce the impacts on the adjacent rural areas and those impacted further away due to the rising topography of the Kent Downs national landscape escarpment.</p>
SoM no 11	<p>The quote from “Alternatives” that “<i>two facilities were built in Kent</i>” suggests that Sevington and Waterbrook were equal . For the avoidance of doubt Sevington was always the primary facility. But the complexity and speed of the build combined with winter weather delays ahead of the immovable deadline of EU exit at midnight on 31<sup>st</sup> December 2020 led to the sensible precaution of a back up site . This was provided by Government taking a lease on the newly constructed expansion of the Ashford International Truck stop which was almost finished but not yet occupied . The building works there involved a change to the lanes and lighting and installation of some temporary sheds. When Government handed back the lease the reinstatement was to the former lighting and parking lanes plan and completion of the mothballed restaurant and other driver facilities for a 5 star operation.</p>

	<p>– the facility was opened by the Minister on Dec 3<sup>rd</sup> 2021. For comparison it is locally assumed that if the IBF closed the Sevington West site would become warehousing.</p>
SoM 13	<p>It is assumed that the Inquiry will have written or oral input for Toby Howe, Strategic Resilience Manager at KCC to address the Inspector's question. The local experience is that although we all hate the disruption of Brock, the arrangements now in place to hold HGV traffic when there are interruptions at the short straits crossing, are the least worst solution because we believe the held traffic clears much more quickly than if it were diverted into an off highway location, such as the 1200+ spaces that would be available in the 'swim lanes' of the IBF .</p>
SoM 15, 20, 24 and 25	<p>Sevington East is much discussed under the policy topic SP7 of the current Ashford Local Plan 2030. It provides the substantial buffer between the edge of the development at the east edge of Ashford which is the subject of this application, and the village of Mersham in the rural area to the east. The proposal to establish BNG as the land use would through a BNG agreement provide BNG credits for affordable housing in Ashford and a 30 year assurance of these arrangements. It would assure the establishment of the BNG Plan and deliver the separation this under the policy wording of SP7 including the intention of the policy set out in the section text " Separation of Settlements" ( ref 2.193- 2.198) . It would be helpful if the unilateral undertaking specified the details of the proposed BNG agreement to secure this. The Mersham community have worked incredibly hard to make this happen in particular The Village Alliance.</p>
SoM 23	<p>The razor top fencing on the north and east sides of the operational site creates a harsh industrialised metalised edge to the development and because it is visually permeable all the light and activity within is visible to residents and passers by externally thus maximising the impacts of the BCP and the IBF on the eastern rural urban edge of Ashford. The palisade fencing also does nothing to alleviate the light pollution. Most industrial sites do not have this external visibility and razor top is not a default. Nearby Kingsford lane is in Mersham parish is protected from the noise and light of J10a by a Jacoustic wooden fence which will eventually be largely hidden by the area of tree planting. Could not the same be achieved around Sevington East ? The wooden fencing boundary to the south provides some protection to Sevington village . The same could be done to the east and north.</p>
SoM 27-33, 52	<p>It is to be hoped that the comments from the Kent Downs National Landscape Team (KDNL) have registered the significance of the current impacts of the site on a wide</p>

	<p>swathe of landscape beyond the site. The elevated location of the site means that the activity on the site is visible with current boundary treatments as palisade fencing , as well as the very wide extent of the light pollution – the glow in the night sky is visible 4 miles to the east from Church lane Aldington, in addition to the sharpness of the light viewed from the Wye Down in the KDNL . Assuming there is common ground now that this a problem that needs to be addressed to make this application acceptable, it follows that the task is to review the lighting and the fencing to contain the impacts to inside the red line boundary. There has already been a successful review to reduce impacts for the immediate neighbours in the village of Sevington, so in principle the same process could be undertaken for the north and eastern areas of the site where the neighbours are a further away but also materially impacted. It is also notable that the BNG plans for Sevington East could be set back by continuous night-time light disruption. If what to do and how to ensure it happens is going to take longer to finalise than the duration of the Inquiry maybe the objective can be confirmed though the Inquiry and the details, action plan and timing confirmed by discharging a planning condition to contain the light and visual impact to within the site boundary and amend the lighting installation and boundary fencing to achieve this.</p>
SoM 34, 35	<p>The elevated location of the site combined with its location in the Ashford dark skies area add another policy requirement to contain the lighting within the site boundary. Other industrial developments in Ashford have to comply with this policy, this site should not be exempt. The lighting good practice guidelines to avoid obtrusive external light ( light pollution) and to reduce energy use need to apply to this site . An edge of rural location should be BREEAM E2 or E3. 24 hour operation increases the potential harms through the night which makes it even more important to manage the lighting more precisely.</p>
SoM 48	<p>It might be useful at the Inquiry to explore whether the proposed BNG plans for Sevington East are in reality a viable land use for an area which needs to work long term as a well managed strategic separation between the IBF site use and the rural village of Mersham. This is a different use than if it was an adjacent site BNG mitigation use , even though the land management involved could well be the same. Making this a BNG site could enable other sites used to deliver affordable housing to come forward , so there is benefit in delivering a BNG plan even if it is not all needed to mitigate the BNG loss arising within this application.</p>
75 and 14	<p>As regards noise , and noting that the application is</p>

seeking permission for refrigerated semi-trailers the recent concerns of nearby residents experiencing vibration and low frequency noise it would perhaps be sensible for the Inquiry to ask the Applicant to explain how the semi trailer refrigeration units are being managed. Ashford has considerable experience of refrigerated units in laybys and roadsides close to residential areas – it is one reason the borough now has a large very well equipped lorry park. Semi trailer refrigeration units, especially those diesel powered produce considerable low frequency noise and vibration which can be amplified by the fabric of properties close by, especially older properties with less substantial foundations ( which sometimes act like a loudspeaker box). This is probably something that could be resolved by identifying the particular problem and adjusting the operational facilities to resolve it.