



Sevington with Finberry Parish Council

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&

Mersham Parish Council

Closing Statement

CROWN/2025/0000002 Sevington Inland Border Facility

Issue 1

12th December 2025



Sir. I am pleased to present the following **Closing Statement on Behalf of Sevington with Finberry Parish Council & Mersham Parish Council** in respect of CROWN/2025/0000002

Sevington with Finberry Parish Council and Mersham Parish Council acknowledge the national importance of the Sevington Inland Border Facility and the economic benefits it brings. We do not oppose the facility's purpose. Rather, we seek to ensure that its permanent retention is conditioned in a way that protects our local residents' quality of life, our rural character, our heritage assets and its impact on the wider landscape. We appreciate that the applicant has made several concessions in the proposed conditions – and we note these positive steps – but we must ensure these measures are robust, enforceable, and sufficient to address the outstanding concerns of our communities.

Noise Impact

Noise has been a paramount concern since the site became operational. Residents (including parish councillors) living near the site have repeatedly experienced intrusive noise, notably a persistent low-frequency droning and tonal "hum" that permeates homes, disturbs sleep, impacts quiet enjoyment of gardens and undermines well-being.

This is not addressed in the applicant's noise assessment – the new Noise Impact Assessment submitted with the application makes *no reference* to low-frequency or tonal noise issues. This omission is critical, as Government planning guidance (NPPF/PPG on noise) emphasizes that tonal and low-frequency noise should be considered in assessing noise effects. The original 2020 noise report for the temporary operation had recognized these characteristics – for example, it recommended keeping refrigerated trailer units to the north of the site, away from residents, to mitigate exactly this kind of disturbance. Yet the current application's noise report neglects to continue that safeguard.

During the site visit, the number of refrigerated vehicles operating on Diesel was significant, creating a very high noise environment. This was particularly noticeable in the south section of the site where there are no electric hook-ups. Where these are provided to the northern part of the site, only one unit not in the ownership of the operator was plugged in. We wish to draw your attention once again to the fact that the noise report as submitted only includes refrigerated trailers operating on electricity and positioned to the north of the site. It does not include refrigerated trailers operating on diesel on any part of the site.

We are therefore encouraged that the applicant has agreed to a condition for an updated noise report – this is a welcome concession and a point of common ground with exception of the absence of the requirement for the report to be independent. We urge that this noise assessment be made a firm requirement of any permission, with a clear brief to investigate the tonal and low-frequency noise complaints in depth (in full collaboration with local environmental health officers and affected residents via the Parish Councils).

The outcome should dictate any further mitigation needed on-site – be it upgraded acoustic barriers with improved low-frequency performance, relocation of noisy operations (for instance, ensuring refrigerated lorries operate only in the northern part of the site as per the 2020 permission), and/or operational restrictions & controls including additional electrical hook-ups and a requirement that stationary refrigerated trailers must not operate via internal combustion engines.

As a side note - refrigerated unit engines are not subject to the same strict emissions control regulations (noise and pollution) as road vehicles, with refrigeration units emitting 16 times more NOx and 40 times more particulate matter per unit of energy



delivered when compared to a HGV engine. This further reinforces the argument to require all refrigerated units to operate via electric hook-up whenever stationary in the interests of the health of staff and users of the site and the wider pollution impacts of the site.

In summary on noise: we appreciate the applicant's agreement to providing a more robust noise impact assessment which includes the requirement to engage with the Parish Council in its preparation. It must be comprehensive and followed by effective action which includes constructive dialogue and real mitigation. Only this will resolve the disruption that has for too long plagued our community.

Lighting and Light Pollution:

The site's lighting has improved somewhat in response to feedback, but remains a significant issue.

For nearly Five years, the facility was illuminated at full strength across its 24/7 operations, casting a glow that intrudes into local homes, impacts dark rural skies and creates an unwelcomed visual intrusion into night views from the North Downs.

It also shines into what should be ecologically dark zones – areas that were meant to be protected for biodiversity during the site's construction are now lit up all night.

The applicant's Lighting Impact Assessment (June 2025) acknowledges that current lighting levels and glare do not comply with local authority guidance for dark skies.

We are grateful that the applicant has proposed concrete measures to reduce lighting impacts and has committed to undertaking further work in assessing how impact can be mitigated. These concessions are positive and we recognize the effort made.

Properly controlled lighting will safeguard residents' amenity and protect wildlife, while still allowing the facility to operate safely. We believe this balance can be achieved and we will gladly work with the applicant on agreeing appropriate mitigations and monitoring the effectiveness of the changes.

Landscaping, Visual Amenity, and Aesthetics:

The parish councils are deeply concerned that the site as it stands today presents a harsh, industrial appearance in the midst of our countryside. When originally conceived under the 2019 planning permission for a business park, a comprehensive landscaping scheme was approved – including substantial tree belts, earth bunds, and green buffers to screen the development and soften its impact on surrounding villages and the nearby heritage assets (such as the Grade I listed St Mary's Church, Sevington).

Unfortunately, much of that planned landscaping was not properly implemented during the rushed construction under the emergency order. Large portions of planted vegetation failed due to poor soil and lack of maintenance, and the site's boundaries ended up dominated by stark galvanized palisade fencing more akin to a heavy industrial compound. This has been a source of public dismay – during consultation many residents likened the view to "living next to a prison" – a comparison no community wants to make about a facility in their midst.

As part of making the site permanent, we have an opportunity to put this right. We do acknowledge and appreciate that the applicant has recently begun re-planting efforts. Indeed, over the past month, contractors have been on-site replacing dead trees and adding new greenery in some areas. This is a step in the right direction. However, five years of lost



growth cannot be instantly replaced, and even the new planting must be far more ambitious to truly screen the site.

We note the proposed enhanced landscaping condition which must go beyond the current minimal proposals. This should include reinstating dense tree belts and hedgerows around the perimeter, using mature and semi-mature plants where possible to accelerate the screening effect. It should address the soil quality issues (ensuring new planting is done in adequate topsoil so it can thrive). The requirement for a long-term landscape management plan to guarantee that the green buffer survives and fulfils its function is essential. Crucially, the landscaping must be designed not just for ecology but for visual amenity and settlement separation: it needs to recreate, as much as possible, a sense of a green boundary so that Sevington Church and the hamlet feel distinct from the sprawling border compound.

The site's staff entrance on Church Road is a particular eyesore in a historic area – we suggest simple changes to bring this in keeping with the residential nature of the area and nearby properties through hard and soft landscaping improvements to significantly reduce its incongruity. We are pleased to note a proposed condition that seeks to address this specific area that includes the requirement to engage with the Parish Council in the preparation of the proposals.

We acknowledge and support proposals for the eastern parcel of land known as Highfield is to be retained as an undeveloped buffer as part of the long term BNG and the funding of improvements to the footpath from Blind Lane to Mersham.

The Parish Councils objections to the nature of boundary fencing and buildings have not been addressed. We recognize this is a practical facility, but even utilitarian structures can be visually treated better. For example, had the site considered its impact adequately, the perimeter security fence would be specified in a much more visually acceptable green, as the DVLA site on Waterbrook and the Southern Water Pumping station on the north east edge of the site. Instead, we have a galvanised steel metal palisade with razor-top finishers currently in place at public-facing edges. We urge the inspector to consider how such poor decisions can be justified for retention, setting a precedent for future development to inappropriately follow suit.

A requirement for landscaping to screen such fencing where space allows, combined with the replacement – rather than painting – of fences elsewhere with a more appropriate colour, should be a minimum concession.

Traffic and Highway Safety:

The introduction of the border facility has undeniably altered traffic patterns in our area. Junction 10A of the M20, which serves the site, now experiences heavy HGV flows that result in regular congestion on the local approach roads – particularly the un-signalled sections of the junction – where strings of lorries can cause backups and delays for everyday commuters.

More worryingly, there have been reports of unsafe manoeuvres and accidents, for example HGVs switching lanes suddenly, or ending up stuck on local lanes unsuitable for their size. The most glaring instances have been HGVs attempting to go down Church Road and Kingsford Street where, in some cases, they cause property damage whilst others require vehicle recovery from ditches and even from the front gardens of residents.



Church road is not suitable for articulated vehicles. Impacts include road traffic accidents and one death in 2020 at the narrow railway bridge to Cheesemans Green Lane.

The visit to the IBF site on Wednesday 3rd December was extremely enlightening and provided an appreciation for the task at hand and for all who work there. On returning home, I noticed the fence to the front of the house had been broken by a polish refrigerated vehicle that had attempted to turn around in my driveway just moments before. This is a regular problem.

We believe better signage and enforcement can prevent most of these issues and we are pleased to note a proposed condition relating to this.

Pedestrian safety at the site entrance is also a concern with speeding vehicles tailgating others through the slow moving security barrier whilst not observing the pedestrian crossing point. We are pleased to note a proposed condition relating to further investigation and resolution of this issue which includes the requirement to engage with the Parish Council in its preparation.

Litter and Environmental Hygiene:

Alongside traffic come issues of roadside litter which have greatly affected our environment. In particular, the councils have been dismayed by the increase in litter on the A2070 and surrounding lanes since the IBF opened – notably, a surge in discarded plastic bottles filled with urine and other waste presumably discarded from truck cabs. This is both unsightly and a bio-hazard for those having to clean it. Waste blown from inside the site to the surrounding area is also an issue, with site litter picks only undertaken weekly.

We are pleased to acknowledge that the applicant has conceded to implement regular litter-picking around the site. In fact, recent months have seen some improvement, with operators collecting rubbish on verges (and we thank them for that). We strongly encourage that this practice be formalised as an ongoing obligation and support the proposed condition relating to this.

Public Rights of Way and Drainage:

We are pleased that concessions via the CIL & UU include proposals to improve footpaths, some of which suffer erosion whilst others being impassable at times due to poor drainage. There is also only one dog-waste bin along the entire route which often overflows.

Adequate provisions are required to add further dog-waste/litter bins and committing to their regular emptying; ensuring the footpath surfaces are properly drained and trimming back vegetation as needed. More ambitiously, we repeat our request (made throughout consultations) that when the site's use eventually winds down or security requirements allow, the original direct footpath route between the two village churches be reinstated. While that may be a long-term prospect and one that we understand cannot be conditioned, we would continue to pursue its re-introduction at an appropriate time with the aim of reconnecting the historic path between the Churches of adjacent settlements.

Some existing highway drains along Church Road (just outside the site) have become clogged or overgrown during the IBF's tenure in areas within the verge of the IBF land. The site relies on these shared drains (and a culvert under the railway) to carry its stormwater off-site. We request that the maintenance of those be explicitly included in conditions, as requests to the local council to remediate these have been turned down and cited as an issue for the adjacent landowner to maintain their boundary.



The operator should liaise with the relevant authority to ensure that boundaries are maintained and that all connected drainage infrastructure is kept clear, to avoid localised flooding.

Heritage and Community Identity:

We wish to touch on the matter of heritage assets and local identity, which though not a “technical” issue like noise or traffic, is deeply important to our villages. Sevington, Mersham, and the surrounding area have a rich history – exemplified by the Grade 1 listed St Mary’s Church in Sevington which is directly adjacent to the site as well as numerous other historic listed structures, all of which have been impacted through loss of setting associated with the construction of the border facility.

We have two requests here:

First, we know that as part of the environmental mitigation, the applicant has proposed information boards about the archaeological finds from the site. (The excavations unearthed significant remnants, according to the Post-Excavation Assessment of May 2022.) We wholeheartedly support installing these educational boards; however, the current plan only places them on the east side (in Mersham parish). We ask that information boards also be placed on public footpaths on the Sevington side, where they will be seen by local walkers. The content of these boards should reflect the history found beneath the site – helping to reconnect the community with the history that was literally under our feet. We also encourage the publication of a proper scholarly paper on the findings, as recommended by the archaeologists – this would ensure that the historic significance of the site is recorded for posterity, even as the site moves into its modern role. At the current time, the former is accounted for within conditions, whilst the latter is not.

Second, and more broadly, we remain concerned about the use of the name “Sevington” for the IBF. This might be beyond the strict scope of planning conditions, but it matters to residents. “Sevington” is a small settlement with a historic parish name featured in the Domesday Land Survey of 1086 – having it now commonly associated with a large border facility has caused a sense of loss of identity. In earlier developments, the community successfully petitioned to change the proposed name (the “Sevington Park” development was renamed to “Stour Park”) to preserve the dignity of the name. We ask the applicant and relevant authorities to consider renaming the facility to something more neutral (for example, “Ashford Inland Border Facility” or “Kent Inland Boarder Facility” or similar name which relate to a wider area of coverage). While this may not be within your power to enforce, Sir, we mention it as a goodwill measure that would be greatly appreciated locally and would symbolically return “Sevington” to those who work and live here, symbolically mitigating some damage to local heritage.

Community engagement

Finally, we wish to discuss community engagement and the value of an open dialogue as opposed to the very poor community engagement that we have seen from the site since its inception. Throughout this Inquiry, it has been clear that the distinct lack of constructive engagement with the community has resulted in many of the issues we are having to fight for.

We would like to reach out to encourage regular dialogue throughout the sites lifespan which can be achieved through the parish councils or directly with the community. Our suggestion would be for a quarterly meeting with decision making site representatives (not 3rd party



liaison specialists) and the Parish Councils to maintain an open dialogue to enable better information to flow through to the community in respect of how the site is operating and what is being done to ensure commitments to reduce impacts are upheld. This will also permit any matters brought to the attention of the Parish Councils to be discussed collaboratively well before it becomes an enforcement issue.

Any dialogue secured via a strong recommendation, Sir, that the applicant engages with the community as suggested above would be extremely valuable to the ongoing relationship between the site, its neighbours and the wider community.

Conclusion and Closing Position:

In conclusion, Sevington with Finberry Parish Council and Mersham Parish Council remain committed to working constructively with the applicant and the Planning Inspectorate to secure a liveable outcome. We recognise the concessions the applicant has already put forward in draft conditions, and we give credit for those proposals. They show that our concerns have been heard to some extent.

However, we must also be candid that significant concerns remain. The evidence we have submitted (in our Statement of Case and Proofs of Evidence) demonstrates how, in its current form, the development still falls short of fully mitigating its impacts on our community. We firmly believe these impacts can be mitigated – but only if the final planning permission is coupled with strong, clear conditions that address the issues we have highlighted.

The parish councils therefore respectfully urge you, Inspector, to recommend approval of this permanent application only with a suite of conditions that hold the developer/operator to these necessary improvements.

If, however, these protections are not secured, and the application were approved in a form that leaves our villages exposed to continued noise, light pollution, visual blight, and other harms, then we would have serious reservations about the sustainability and fairness of such a permission. We do not desire that scenario. We choose to be optimistic that the Inquiry will find a balanced resolution.

Therefore, we ask that you recommend granting the permanent retention of the Sevington IBF only with the firm conditions discussed, and enhanced where you agree that matters we have raised are not adequately addressed in order to ensure that the facility is made compatible with the well-being of its neighbours.

This will allow the facility to fulfil its national function responsibly, without further sacrificing the quiet enjoyment, safety, and environment of the local community.

Thank you for considering our communities' perspective. We have faith Sir, that with your guidance, this development can be shaped into a true example of mitigated impact and community engagement. We remain available to assist with any further wording of conditions or any local input required as you finalize your report.

Respectfully submitted by Darren Coppins on behalf of Sevington with Finberry Parish Council & Mersham Parish Council.



Schedule of Attendees during the Inquiry:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]