**Comments from the Environmental Protection Team. Ashford Borough Council**

**Ref:** **CROWN/2025/0000002 & OTH/2025/1437**

**September 2025**

**Air quality**

The air quality monitoring carried out by Ashford Borough Council continues to indicate there is, in general, ‘good’ air quality within the borough. The air quality objectives for nitrogen dioxide (NO2) are being met and, in general, levels are reducing each year.

The air quality report submitted by the applicant as part of the Environmental Statement (Chapter 8) assesses the likely air quality effects of the development. The report discusses the baseline air quality conditions, review of ABC’s monitoring data, likely significant air quality effects of the development and the consideration of the likely evolution of baseline in the absence of the development. Suitable reports, data, guidance and dispersion models were used to establish the likely impacts on local air quality from activity at the site.

The dispersion modelling has taken into account the local background levels and meteorological conditions. Data from 2019 was used as baseline date (year before COVID) and 2026 calculated data used for with and without development, both are acceptable data points.

The modelled data is satisfactory and a negligible impact on the annual mean NO2 concentrations at all existing receptors.

**Additional recommendations and measures from the Environmental Protection Team:**

* Site management to ensure vehicles on the site do not idle for excessive periods of time and electric hook ups are used for refrigerated vehicles when parked.

**Noise**

Submitted acoustic report (Waterman Chapter 9 Environmental Statement).

The Environmental Protection Team (EPT) were consulted prior to the 2024 assessment and guidance was provided in terms of the council’s own noise investigation carried out in 2021, along with locations of sensitive receptors (Church Road to the south of the site). Noise monitoring locations were agreed, and comments by EPT were incorporated into the assessment.

In summary, a baseline year for noise from traffic and rail (without IBF) was selected (2022) as M20 J10a was fully operational, and traffic volumes had returned to pre covid levels. These levels were modelled and predicted the noise levels at the nearest sensitive receptors. In addition, a current day baseline acoustic survey was carried out in November 2024. The development was fully operational prior to and during November 2024 and data was used to compare the predicted dated from 2022.

The report considered the noise from existing fixed plant and building service plant, standby generators, operational noise such as HGV’s movements around the site and road traffic data. A number of assessments were carried out depending on the noise source including:

* A BS 4142 assessment was carried out to assess the onsite noise levels from measured and predicted fixed sources such as plant, break out noise within commercial buildings (inspection sheds) and standby generators and from onsite vehicle movements (HGV’s) along with the processes involving external loading/unloading and refrigerated HGV’s..
* Ambient measurements were taken outside sensitive receptors. The data gathered was compared and acoustic feature corrections were made.
* A CRTL (road traffic) assessment was carried out to predict the 2026 basic noise levels (BNL) L10 18hr (with and without development) with data provided by the transport report.

Conclusions include:

* Noise levels from fixed plant and building services – not significant
* Noise from standby generators – negligible (except for one location – R5 (Sunnybank) negligible/minor adverse nighttime period) – very occasional/ emergency situation therefore no additional mitigation proposed.
* Operational noise (from HGV’s movements within the site, refrigerated vehicles hooked up and noise from external mobile plant in the inspection sheds) – it is noted as the most dominant noise source from the site. An additional +3dB penalty has been added to the assessment for tonality at some locations.

It is noted that the site already has constructed earth bunds and installed acoustic barriers on the site to mitigate the noise experienced by neighbouring residents. The Environmental Protection Team are aware of an emergency overflow parking area to the south of the site (Site reference - Tango). This does not have any acoustic mitigation. However, we understand that this area is only used on very rare occasions for short term use in extreme cases, although data has not been provided showing the use of the site, for example number of days per year etc. If this area of the site remains used on an occasional/adhoc basis, we are accepting of the current justification for minimal mitigation, however if used on a more regular basis in the future, the site will need to provide suitable mitigation or restrictions (such as daytime use only).

**Complaints to and the investigation by the Environmental Protection Team at Ashford Borough Council**

The EPTintially received a number of complaints in 2021 from residents along Church Road and have received further complaints in 2023 in one in early August 2025.

The investigation in 2021/22 identified noise disturbance from operations at the site including fixed plant, idling HGV’s (including those with refrigeration units) and noise from HGV’s travelling around the site (in particular HGV’s travelling on the perimeter road to the south of the site). The investigation involved a number of agents including the DEFRA and DfT.

After a meeting with DEFRA and DfT in 2022, it was decided that complainants should report the problem directly to DfT so the site can investigate and resolve the reported areas of disturbance directly. It is understood that the complainant’s then corresponded directly with the DfT for further investigation and resolution.

In April 2023 we received two further complaints from residents. DEFRA and DfT were contacted again and following advice, the sites dedicated complaint email was provided and sent to each complainant. In addition, incident log sheets were also sent out by EPT to the complainants. The case was closed as no further contact was made to EPT by the complainants or the site.

EPT have received one further complaint registered in August 2025 from a resident in Mersham (east of the site) regarding the noise from the IBF. Incident noise logs for completion and return were issued to the complainant. To date, we have not received any further information or communication from the complainant and as a result, have not investigated further.

**Resident comments**

It is noted in a resident (Darren Coppins) has submitted comments as part of this consultation regarding the ongoing low frequency noise the HGV’s moving or idling on the site, noise from refrigerated HGV’s and additional noise from reversing beepers, clanging of curtain sider poles and horns from the site with reported minimal improvement over the years. It is reported that issues were logged with the site previously and both verbally and as a report as part of the public consultation in 2024. It appears no mention of this report or comments made by this resident have been fully addressed in the submitted acoustic report.

**EPT comments**

The EPT request the following is investigated and addressed as part of the consultation process:

* The concerns raised by the resident and conduct additional investigation to the reported low frequency noise from HGV’s, tonal noise from refrigerated HGV’s, reversing beepers, clanging of curtain sider poles and horns in their analysis of the recorded data in their response.
* Further consideration into the use of the perimeter road to the south of the site used by the HGV’s to exit the site. The applicant will need to consider alternative routes out of the site, particularly during the nighttime period.
* Revisit and address the comments, information and submissions received as part of the public consultation in 2024.
* Provide information showing the number of days the emergency parking area (Tango) has been used each year since the site opened.

**Lighting**

The submitted External Lighting Assessment (June 25 Ref; BSD15371 SEV-WBS-ZZ-ZZ-RP-E63000) and Lighting Survey Report (June 2025 Ref: BSD15371 SEV-WBS-ZZ-ZZ-RP-E-63001). The reports state that modifications were carried out in 2021 to reduce the light spillage beyond the site boundary, areas zoned, and lights either switched off or dimmed when not required. The most recent light survey (April 2025) notes a number of further improvements that can be made, including the reduction in the number of lights used, reduction in direct glare and upward light that can be seen from the distance.

Residents have commented on the current lighting provision for the site, including limited shields, poor sighting and angling and the general intensity and illumination of all areas of the site when dark.

The conclusion of the 2025 External Light Survey

* All column luminaires to be fitted with baffles/shields to remove the impact of direct glare.
* Consideration of dimming of the luminaires to a lower wattage in different areas of the site to create a lower average lux level and minimise the indirect light spillage which appears to be impacting on the dark sky issue due to potential reflection from the finished road surfaces.
* Review the capability of the lighting control system to assess the flexibility of switching off certain circuits at night.
* Assess the actual operation of the site to determine areas which are not always needed to be operational on a daily basis and control those areas accordingly using the lighting control system to switch off certain circuits at night.
* Further to the above, the FM team have advised they are in the process of preparing an implementation plan to reduce lighting at night by switching off a selection of the lighting circuits and dimming other lighting circuits, where operationally feasible. We suggest this plan is obtained and reviewed and that a programme of monitoring and recording is implemented

The Environmental Protection Team (EPT) request that the applicant implements the results of the 2025 site survey immediately.

Regards

Tanya Lomakin

Environmental Protection Team