**Sevington with Finberry Parish Council provide the following response to CROWN/2025/0000002.**

1. **Introduction**
   1. During the public engagement, The Parish Council met with neighbouring Parish Councils to collect all relevant issues with the site. These issues were presented to the applicant in November 2024. The presentation made is included in support of our comments.
   2. During the consultation period, a survey was distributed to 11 dwellings in the Parish closest to the site and a link posted in Parish noticeboards. The survey encouraged engagement with the submitted documentation whilst requesting opinion on suitability of proposals. 22 Responses were received and have been used to help determine important matters for this response. A summary of the survey results have been included in support of our comments.
   3. The Parish Council recognises the employment benefit associated with the site and its necessity for operations post Brexit. However, the proposals as submitted fail to address the majority of issues which are fundamental to the site's impact on its surroundings.
   4. As this is the only opportunity to effect change for necessary improvement of the site, we object to the proposals based on the issues raised below.
2. **Site Aesthetics** - 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
   1. 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.
   2. Views of the site from the A2070 have been cited as much worse than expected.
   3. 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.
   4. Fencing facing countryside views is poor and at odds with its setting.
   5. 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.
   6. 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. **Noise** - Local plan S15 - Finberry North West (Relevant paragraph 3.193) NPPF Chapter 15
   1. 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.
   2. 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.
   3. 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.
   4. Some parts of the site feature no acoustic barriers to residential property.
   5. 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.
   6. The implemented acoustic strategy is not fit for purpose, with timber acoustic fencing providing very little attenuation at lower frequencies.
   7. An independent noise impact assessment should be sought that considers all complaints made, with the recommendations implemented as part of any permission granted.
4. **Landscaping** - 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
   1. Landscaping to the site had received planning approval in 2019 following public engagement and consultations. It was understood that the IBF would retain the approved landscaping.
   2. 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.
   3. Poor maintenance has resulted in the death of planting that should now be established.
   4. Proposals within the submission make some positive contributions to rectifying the landscaping with more mature planting and increased screening.
   5. 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.
   6. 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.
5. **Lighting** - Local Plan ENV4 - Light Pollution and promoting dark skies / NPPF Paragraph 125
   1. 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.
   2. 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.
   3. 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.
   4. 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%).
6. **Footpaths** - ENV5 - Protecting important rural features / ENV6 - Flood Risk
   1. Footpaths have been adapted significantly from the proposals of the original approved planning for the site in 2019.
   2. 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.
   3. Respondents to the survey report poor maintenance of the footpaths, dog feacies 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.
7. **Archaeology**
   1. Archaeology information boards are proposed to the east of the site in the Parish of Mersham.
   2. 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.
   3. We would also encourage the writing of a formal paper recognising the findings, which is recommended within the post excavation report.
8. **Traffic & Litter**
   1. The increased HGV movements have resulted in significant increases in litter and congestion issues on local roads.
   2. 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.
   3. 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.
   4. 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.
   5. 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.
9. **Sevington Church S106**
   1. Funds for Sevington Church to be concluded.
10. **Other matters**
    1. Survey responses also raised the following issues:
       1. CCTV cameras are intrusive and should not cover public areas (24%)
       2. CCTV cameras should not be seen from public areas (24%)
       3. The site should not be called 'Sevington IBF' (31%)
       4. 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%)
11. **Conclusion**
    1. We recognise that the facility provides employment benefit to the area and provides essential services and hope that the site will continue to provide such benefits to Ashford for the long term.
    2. The proposals submitted appear to seek to justify the retention of a poorly designed facility with aesthetics that would not be acceptable of any fresh application for a green field site when originally built, or today.
    3. As this application seeks to retain a site that was to be returned to its original state at the end of the SDO period, the application must be considered as if it were not built, to ensure that the site forms a long term benefit to Sevington, Ashford and the wider towns and villages.
    4. We cannot therefore support this application on the basis of the documentation as submitted and this opportunity must be used to secure the necessary upgrades to bring this site into line with the minimum that would be expected of any other development in Ashford and the surrounding towns.
    5. The Parish Council invites any discussion in relation to how the above issues can be mitigated as effectively and economically as possible.