

This documents sets out the comments on the Crown development Application by DfT/DEFRA/HRMC for “Retention of the existing buildings, Goods Vehicle parking spaces, entry lanes, refrigerated semi-trailers, staff car parking spaces, access, site infrastructure, utilities, hardstanding, landscaping and ancillary facilities and associated works; and ongoing use of the site for an Inland Border Facility and Border Control Post, operating 24 hours per day, seven days per week.”

By way of background, I am the Ashford Borough Council Ward Member for Mersham, Sevington South with Finberry and the application site is within this ward. I live very close to the Sevington IBF, [REDACTED]

I had an opportunity to meet with DfT, DEFRA, JLL and Kanda Consulting (who were DfT’s planning advisor) on 7th October 2024. I attended public consultation events on 19th & 26th October 2024 in Mersham Village Hall and Willesborough Church. I had a site visit on 25th October 2024 which is the source of the internal IBF photos included.

The issues I have are below.

- **Long term assurance over the non-development of the land east of Highfield Lane is required.** This is required under ABC local plan (Policy SP7) which prevents the coalescence of Ashford with its surrounding villages. The site must be retained for the long-term benefit of biodiversity and the local community ending the speculation that the site will be developed as was envisaged by the previous owner (AXA/Friends Life). The reason for concern is linked to the request for increased usage at the Sevington IBF. A concern could be if the UK government are seeking to consolidate operations at the existing IBFs into a fewer number, including Sevington IBF; this could require expansion into the field east of the Sevington IBF.
- **Attempted HGV access via Kingsford Street and Church Road Sevington remains problematic with regular attempts to enter the IBF via the staff entrance.** When this happens the HGVs cause damage to residential properties (including my own – my garden fence was destroyed by a HGV reversing to accommodate traffic from the opposite direction, pictures below).



HGV Damage to my property



Collateral damage by HGV on Church Road

Clearer signage is required approaching Church Road from the A2070 that there is no access to the IBF such as this.



- **There are regular right hand turns from the A2070 into the IBF.**
This is when lorries access the IBF from J10 – better signage from the M20 is required to prevent exit from the M20 at J10 rather than J10A. The issue is that the signage on the M20 is limited and the black cross on a yellow square is missing from the ½ mile exit signs from London. SatNav operators / Google Maps should be advised of the correct route via J10A.
- **The landscape management plan for the land east of Highfield Lane is required to be developed and implemented** as there is a lack of planting to shield Mersham from the impact of lighting. A repeat of the excessive growth of ragwort and thistles from 2024 alongside Kingsford Street must be avoided.



Excessive thistle growth on the field east of the IBF

Many of the trees planted around the IBF have died, these need to be replaced.

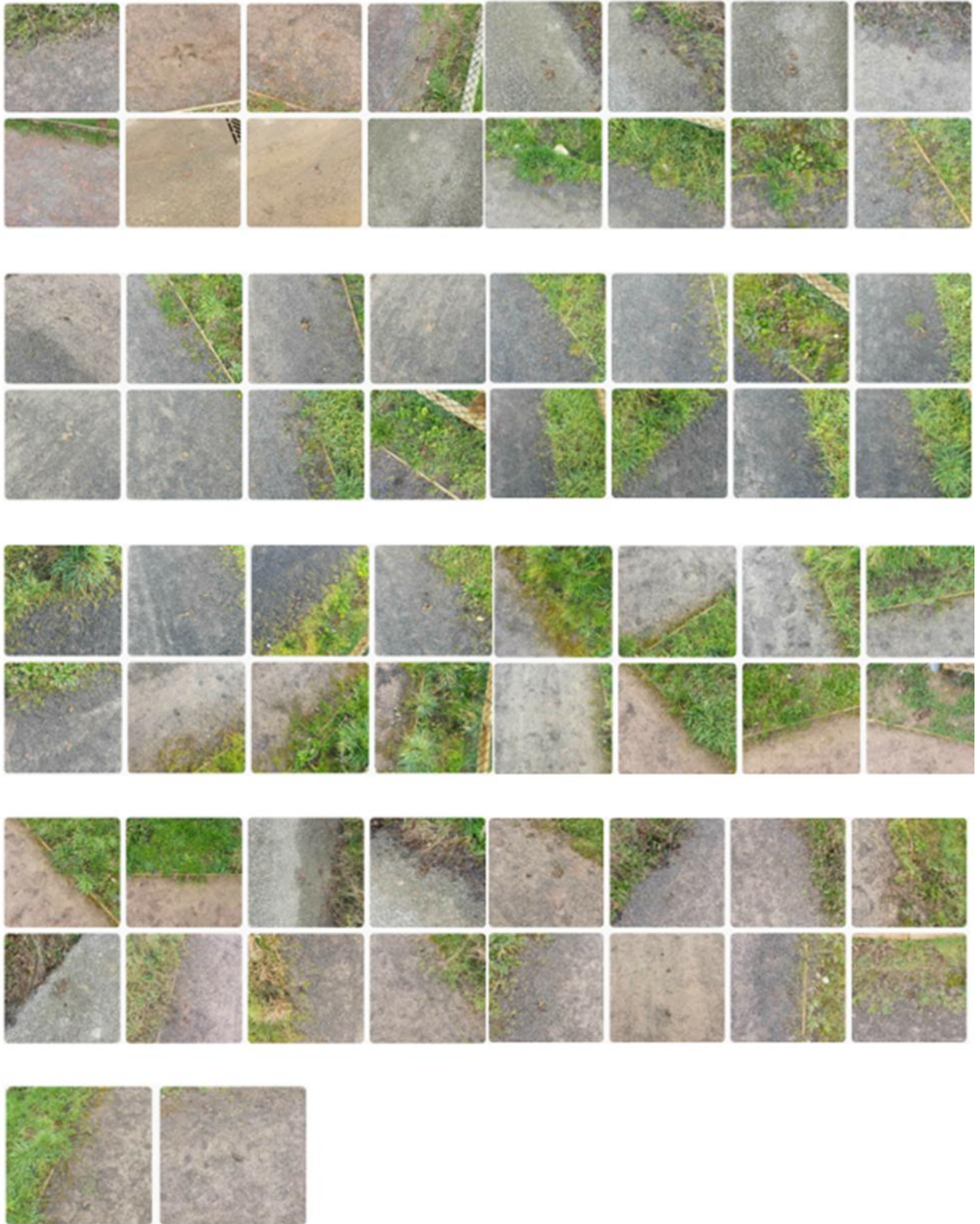


A collection of photos showing just how many trees have died

In partnership with KCC, DfT said in 2022 that they intended to implement a pilot woodland scheme on site, "trees outside woodland" which aims to reconstruct indigenous woodland within 20-30 years including the Miyawaki method. There is no evidence that this has happened. That said planting proposed to provide visual screening must be natural regeneration, not just planted trees.

The area was supposed to provide a habitat for hedgehogs, bats, dormice, brown hare, reptile, newts, birds of prey and breeding birds of conservation priority including skylark and nightingales, what has gone wrong as there is no evidence this has happened?

- I assume **pollution monitoring** is being carried out. Does current usage of the site reach the trigger points for particulate prevention?
- There is **environmental damage with the amount of litter by the roadside**. It's evident to see just outside the main entrance of the IBF on the opposite side of the A2070 the actual amount of litter mainly involving plastic bottles filled with a liquid (not recommended for consumption). The IBF has a duty of care to ensure that the surrounding areas are free of litter created by their users.
- In addition to litter thrown from HGVs approaching the IBF there is a huge amount of **dog faeces on the bridleway paths**. The developer needs to provide litter bins and signage to counter this happening on their land.



66 dog poos on the surrounding bridleways on a recent walk around the bridleways

- The **maintenance of the bridleways is less than ideal**. The following picture shows the deterioration from water runoff south of the staff entrance.



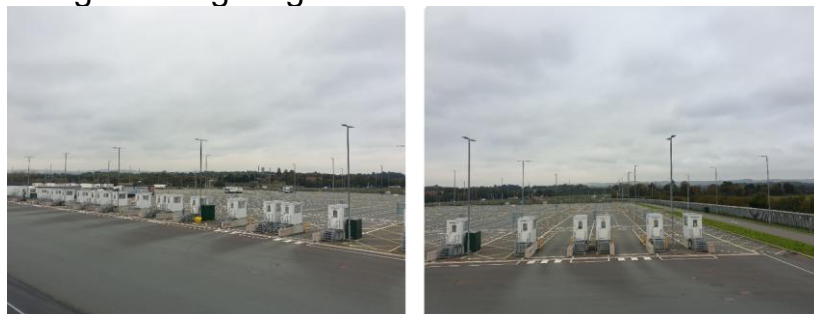
Bridleway deterioration near staff entrance

- 12m columns for the lighting units is not desirable or necessary given the height buildings used on site. It causes **excessive light pollution in Mersham.**



View of Field to East from IBF showing height of light columns is excessive

I accept that lighting is switched off at the overspill areas when they are not used but more needs to be done to manage light overspill. Operations on site are limited (the pictures below were taken on a Friday afternoon) and the site appears oversized. There needs to be a way of shutting down lighting on those swim lanes which are not used.



Empty Swim Lanes showing the excess capacity at Sevington IBF



Light spillage from Mersham

- **Landscaping is required in the viewing corridor** and other actions required to ensure its long-term prevention of development. Other planting should be considered in areas of the car parks to soften the impact.



Viewing Corridor requires better planting



Original AXA/Friends Life plans for planting in the viewing corridor – not delivered by DfT et al

- **The frontage on to the A2070 link road is poorer than expected with less planting.** It is a dismal entrance into Ashford off J10A. As a key entrance to the town it should be presented with planting to soften the visual impact of the security fencing.
- **S106 contribution must now be provided to Sevington Church as envisaged.** It was delayed by the long-term lease granted to National

Power Network, but I understand this is now resolved. The Church Works Specification submitted by the diocese sets out how the improvements to the Church will complement the operations at the IBF as it will provide a valuable opportunity to spend time away from the workplace and enjoy a break.

St Mary's Church

Changing Setting
A New Industrial Development is planned to the south of the Church which will impact on the future of the Church. Landscaping and Wildlife areas will be built to the east and south and a new car park built to the entrance to the churchyard. The developers are contributing funds to the re-ordering and re-imagining of the building to enable it to provide facilities to serve the existing and emerging communities.

This exhibition shows a vision of how the church can be improved to allow it to provide a more flexible space which could be used not only for worship, but also for community uses, such as refreshment and relaxation spaces, fitness and art classes, intimate concerts and lectures. The re-ordered church will serve the needs of the community by providing a place of worship, spiritual comfort and refreshment during work breaks. This will not only ensure the continued use of the church but will also provide the church with an income to maintain its upkeep and enable it to continue to serve the community as a place of worship.

History and Location
Twenty and a little better, as it always will have been!
- William Perceval in 'The Historic Buildings of England'
The name 'St Mary's' possibly derives from the Anglo-Saxon 'Sige' meaning 'victorious' or 'valiant'.
The Norman church would have consisted of a chancel and a smaller Nave. In the mid 15th Century the nave was extended west and a tower added. The south west chapel appears to be 16th Century.
Since the middle ages little has happened to the church except for a re-ordering in the late 19th Century around 1870/78 probably done by Whitty and Fry. We presume new pews were added, pews moved and the steeple to the south side removed in the time.

Serving a changing community

A flexible space for worship and community

Our vision for the building

- The thresholds dropped at the South Porch to ensure that compliant access is achieved.
- New Raised Tiled or Timber-boarded floor provides a more functional floor while retaining and preserving the pavement of tiles which represent the rich history of the Church. Existing Pews in Nave to be removed and replaced with stackable chairs.
- Existing chancel Pews to be removed and replaced with new stackable pews. Shown below are an example of these pews.
- Staircase dropped to suit Chancel Floor line. Commemorative Rail to be moved to the top of the new step.
- Victorian Sanctuary floor removed and new tiled floor installed at same level as chancel floor.
- The existing font to be relocated.
- The removal of the non-significant Pulpit.
- New Kitchens installed at rear of the Nave which can be hidden when not in use. Shown below (B) is a similar, larger Church kitchen. Also shown below (Bb) is an example of a Kitchenette in a Chapel.

Ground Floor Plan 1875

1. Staircase
2. Typical early Tiled floor
3. The Existing Font
4. Larger Church Kitchen
5a. Kitchenette in Chapel

A flexible space for worship and community

Our vision for the building

- The installation of a new Timber Screen with door to replace the existing great screen. Shown below is an example of a similar Timber Screen with a door.
- New Foldable Ramp to be installed at the Chancel which can be folded when not in use. There is also a space-saving aspect of the foldable ramp. Shown (on an adjacent board) is an example of a similar foldable step.
- The installation of Chandeliers with electric radiant infrared heaters to provide a pleasant radiant heat to visitors at the Nave. Shown is an example of the Chandeliers proposed.
- An over-door warm air curtain installed at the South Porch will provide visitors a radiant heat at the porch entrance and also reduce the heat loss through the screen. Shown below is an example of an over-door warm air curtain.
- Additional Chair and General Storage is provided throughout.

Ground Floor Plan 1875

1. Timber Screen
2. Chandeliers with Electric Radiant Heaters
3. Over-Door Warm Air Curtain
4. Additional Storage

An Accessible Church

Towards a more functional Church

It is intended to improve the accessibility to the Church with the following -

- Care Park provided by developers.
- New Lighting to improve footpaths from car park to South Door of the Church. Shown below (2.1) is a typical lighting bollard approved by English Heritage. Also shown below (2a) is an example of a footpath lighting bollard by Long Rake Spar Ltd.
- Ramped floor inside the Porch.
- Refurbished Accessible Tables.
- New folding ramp installed at the Chancel.
- New Hearing Loop to be installed.

Site Plan 1875

2.1. Typical Lighting Bollard
2a. Bollarding, footpath lighting
3. Folding Timber Ramp

It is intended to be improved by adapting the existing compost and fitting a miss sewage treatment plant within the tank.

Church Work Specification

The information board at the public exhibition refers to £792k being provided in wider social benefit, I have no idea how this calculation was made but providing the payment to the local Church will support social benefit as well as the IBF.

- A number of **employees travel to the IBF for work on e-scooters**. The applicant is reminded that these are illegal on roads and staff should not use them to travel to work.
- I have noticed a **lack of respect for the zebra crossing** at the staff entrance with speeding and tailgating by some drivers exiting / egressing the staff car park by car. This presents a risk to pedestrians and other users of the bridleway and needs to be managed better.
- Information boards** were agreed by AXA / Friends Life to explain the Cold War Observation Bunker and other archaeological finds along with the Biodiversity Strategy. These should now be brought forward.
- The DfT should explore long term improvements to connectivity by **extending the PROW from Blind Lane to the village shop in Mersham**.

- **There are issues with idling engines on site and EV charging points should be explored.**
- I have heard plans have mooted **plans for the IBF to be used as a Brock overspill or alternate. This is unacceptable** and should be specifically excluded from the consent.
- At the moment, the Trade Operating Model (TOM) established by the old government (with plant and seeds & sanitary and phytosanitary checked at the IBF in Sevington) is in existence and DEFRA etc are still operating towards that. **Clarity is required on changes arising from the recent EU reset** and if / when live animal checks will start; at one point they were due to start in October 2024.
- When I last inquired, KCC have a draft post excavation report on the **archaeological works undertaken** for the IBF site in 2020. It had not been finalised and as such, not in the public domain. The report on the archaeological works done on the adjacent field east of Highfield Lane also revealed significant archaeology including a Bronze Age barrow. It will be beneficial to disseminate positive information about the important archaeology found through local groups.
- There are reports of the spread of **invasive Goats Rue** from the site. It seems to have colonised from the IBF all the way down the M20 to junction 11. Apart from its tenacious nature – this plant can regenerate over several seasons – it is toxic to ruminants with the potential to induce a build-up of excess fluid in the lungs, cause blood pressure, paralysis and eventually death. This needs to be controlled.
- At a meeting with Southern Water (SW) on 25th October 2024, SW reported that they were still tanking waste from DEFRA away from the site rather than using the **foul water sewerage system**. There is environmental cost of using tankers. At the public meeting on 26th Oct the DEFRA team assured me that the waste was not being taken to Bybrook so does not contribute to the nutrient neutrality / phosphorus issue at Stodmarsh SSSI. The applicant should provide assurance over where it is being taken, and confirm it is not being discharged into the Beult as this river has its own reasons to be protected..
- **Vibrations on adjoining homes** in Church Road have been reported. There have been reports of low frequency droning noise, and monitoring equipment has been previously installed at Bridge Cottage and Orchard House with the results requiring update and independent scrutiny. Since the IBF became operational for SPS inspections, the **low-frequency hum** has been ever present - often around the clock. Could this be related to refrigeration or power systems associated with the facility's new storage functions? As I say, independent scrutiny is required.
- There are plenty of incidences of HGV traffic passing between the sheds and acoustic fence, in a low gear and at slow speed, leading to **raised background noise**. I do not believe the acoustic fencing is fit for purpose. If gathered evidence finds the internal ring road to be an

issue, the site is to be redesigned with additional noise mitigation methods to be installed. This is required now the site is to be in long term use.

- The overflow lorry park ([REDACTED]) has lorries parked in it from time to time. This is the case when the remainder of the site is at capacity or when maintenance work is being undertaken. When in use, the lights are on all night, which have no shields. Also, there are **no acoustic barriers for this section**. I need to sleep elsewhere in my house when this happens because of the light and a low thrumming noise at night coming from the site. The light disturbance is unacceptable along with the fact that one of the CCTV cameras is directed into one of my bedrooms. CCTV coverage outside the IBF to be reviewed and ensure it is not excessive.

Residents have been very generous in their support for the site during its temporary use but now the DfT/DEFRA/HMRC has applied for permanent status the issues that have been brushed under carpet listed above need to be addressed.