

Inland Border Facility

Submission to Planning Inspector's Inquiry

2nd December 2025

Good afternoon, Sir

My name is Pdraig Herlihy and I represent The Ramblers – Britain's Walking Charity – for the parish of Mersham. I am also a member of the Committee for the Village Alliance, the local group dedicated to protecting Mersham from development pressures. This presentation has been approved by the Ramblers and the Village Alliance. However, I have also been a resident of Mersham for over [REDACTED] and some of the things that I will say today are more personal views rather than official policy of The Ramblers and/or The Village Alliance.

The Ramblers and The Village Alliance are not directly opposed to the granting of a permanent planning permission for the Inland Border Facility. The need for the Facility is acknowledged, and the presence of the existing facility means that any ecological damage has already been done. However, there are certain mitigations that we think will be important to implement as Conditions on any Planning Permission in order to improve the area for walkers and for local residents.

The Ramblers were very disappointed that the public footpath along the ridge between the churches of Sevington and Mersham was permanently extinguished by the County Council in 2023. The alternative route installed is lengthy, tortuous and its aesthetic value is greatly diminished by the security fencing, lighting and vehicle movements.

It is accepted that the current layout of the Facility precludes the reinstating of the Public Footpath along the ridge, directly between the two churches. However, the route has been preserved as a line of sight to Sevington Church. We believe it should be a Condition of the Planning Permission that the Public Footpath should be reinstated if any subsequent redesign of the security and building arrangements of the Facility would enable the Public Footpath to be reinstated in its original location.

Secondly, the alternative route of the Public Footpath has not been well maintained since it was installed five years ago. Water has been allowed to erode some areas of the surface, rendering the surface uneven and a trip hazard. It should be a Condition of the Planning Permission that the route of the Public Footpath should be well-maintained at the land-owner's expense.

The Public Footpath crosses the road that provides access to the staff entrance to the Facility. It does so between gates on each side of the road. The staff entrance is regularly not staffed, but operated on a remote system, which can have the effect of encouraging drivers to speed up as they approach the gate. This is hazardous to pedestrians and improved physical traffic calming such as a raised 'table' should be used to slow vehicles in this location.

The single most important aspect of the future management of this site is that no development will take place on the field known as Sevington East for the next 30 years, and the area will be preserved in order to secure biodiversity net gains from the area.

This is vitally important and should be recognized as a Condition of any future Planning Permission. Such a Condition should also ensure that the land is actively managed in order to maximise biodiversity.

The second most important aspect of the future management of this site relates to the current level of light pollution from the site. It will be very important that the latest 'on-demand' lighting systems are used to ensure that any lights not required at any given time are extinguished, reducing the overall light emissions from the site to the lowest level that is consistent with security and safety matters. There needs to be a commitment from the DfT and National Highways to working with the Borough Council to maximise the benefits of this process on an ongoing basis.

Attention also needs to be given to the spillage of light from the site to immediately adjacent properties. With the development of new focussing technology and LED lights there is no excuse for light spillage beyond the site, and this should be resolved as a Condition of the new Planning Permission.

One way in which the light pollution from this site could be mitigated for the village of Mersham would be the planting of a substantial belt of trees which will grow higher than the trees, on the bank to the east of the site. The planting already installed has failed very substantially and needs to be tackled with renewed vigour and with far better aftercare, to ensure that this protective belt thrives and delivers the required benefits. It may even be better to plant the trees in the field to the east of the bund, rather than on the bund itself, where soil quality and water retention is likely to be poor.

The requirements of the Borough Council for noise assessments are to be applauded. There needs to be further noise assessments of some of the more penetrating and impactful noises on the site, and work between the Borough Council and the site management teams to see how the management of traffic flows around the site might be changed to minimise the noise pollution on the areas immediately adjacent to the site.

Slightly further afield, the Borough Council's Transport Assessment refers to queuing of traffic on the A20 east and west of Junction 10a of the M20. It is clear that at peak times there is an unacceptable degree of queuing, particularly from the Ashford-bound carriageway of the A20 (east of Junction 10a). Research should be undertaken to see if this is due to vehicle movements from the Inland Border Facility, or merely the translocation of previous issues with the old Junction 10 for traffic heading north on the A20.

On the subject of traffic movements, it should be a Condition of any Planning Permission that no part of the Inland Border Facility should be used as a routine lorry park for the parking or storage of lorries. The site is on the wrong side of the M20 to function well as a routine lorry park and this should be expressly forbidden in any Planning Permission. There may be a role for the site in emergency situations, as parking here might be preferable to Operation Brock, but this is not the place for routine parking of lorries whilst waiting to cross the Channel.

In summary, the Inland Border Facility is a significant piece of transportation infrastructure to absorb within the local area. In conjunction with the Stone Street Green Solar Factory, Otterpool and other major developments in the area the Facility contributes substantially to development pressures on the local area, which was previously entirely rural in character.

The mitigations proposed here seek to minimise the negative impact of the permanent location of the facility on its neighbours, the village of Mersham and the surrounding areas.

Thank you for permitting me to speak today.