

**Pre Inquiry Meeting (PIM)****9:30 Tuesday 11 November 2025 - Online**

---

**APPLICATION REFS:-**

CROWN/2025/0000002

**Site Address:-**

Sevington Inland Border Facility, Mersham, Ashford TN25 6GE

**Applicants:-**

Department for Transport (DfT), DEFRA, and HMRC

**Development proposed:**

*'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.*

**Statement of Matters** issued 21 October by: Mr C Parker, BA(Hons) PGCert MA FRGS MRTPI IHBC

**Consultation periods:**

Between 28 July and 12 September 2025 for most parties.

Between 28 July and 26 September 2025 for Ashford Borough Council

(The 26 September forming the last representation period for the purposes of the Order)

---

1. The Pre Inquiry Meeting (PIM) is presided by the appointed Inspector:

Mr C Parker BA(Hons), PGCert, MA, FRGS, MRTPI, IHBC.

2. Good morning, my name is Cullum Parker. I am a Fellow of the Royal Geographical Society, a Chartered Town Planner, and Member of the Institute of Historic Buildings Conservation.
3. I have been appointed by the Secretary of State MHCLG under s293I of the TCPA to determine this Crown Development Application.
4. As per the agenda, the first part involves a lot of talking from myself, just setting out procedural matters, and my thoughts on the Inquiry process, and how it may take place for this case.
5. I will also try and ensure that shortly after this PIM, my openings are published on the case website, so that you all have a brief record of the points I made, and how all parties can assist the Inquiry.
6. It is worth acknowledging at this point that this is the first application submitted and being considered under the Crown Development Application route. Whilst, of course, many terms and/or processes may appear similar to when you have been involved in planning applications and/or appeals, this is a new process where all parties are learning how it works.
7. I appreciate the efforts of everyone attending today, and all of those who have taken the time to assist the process up to this point. I appreciate that some aspects, such as the timeframes proposed, and the order (for example Statement of Cases) is somewhat accelerated and does not align perfectly with what you may be used for a planning inquiry.
8. Nevertheless, I have continued to strive towards ensuring that the process is fair, open, and impartial; and I appreciate everyone's help to get us to this point.
9. Again, as set out in earlier correspondence, the purpose of this PIM is not to consider the planning merits of the proposal. That will take place at the Inquiry and in the written submissions, and through to the Statement of Reasons and Decision Notice.

*Moving onto procedural matters;*

10. I will typically refer to individuals as Mr or Mrs [surname].
11. With regard to the main parties, to give focus to this Pre Inquiry Meeting, I would be focusing on the spokesperson/advocate.
12. The attendees are (Spokesperson in bold):

[illegible]

14. There are also some interested parties who I considered would be 'desirable' to attend the PIM, who are attending today. Again, I think that it is useful for them to be here in order that they can understand the process in this case.
15. The PIM agenda was issued on 30 October 2025, and can be found on the Find a Crown Application website, using the reference 0000002.
16. There will be no discussion during the PIM as to the merits of your respective cases and I will not hear any planning evidence. Rather, the purpose is to set out a clear steer on the management of this case and the presentation of evidence, so that the forthcoming Inquiry is conducted in an efficient and effective manner.
17. The Inquiry follows the procedure notification issued on the website on **20 October 2025**, where I considered the submitted evidence; including the planning application, the Environmental Statement, and the representations made. Under s319A TCPA, I determined that an Inquiry was appropriate for the reasons given in the notification.
18. The Inquiry is scheduled to open at **10:00 on Tuesday 2 December 2025**.
19. It is currently scheduled to sit for approximately 8 days. However, following the issue of the Statement of Matters, and the intervening period, it may well be the case that issues become narrowed as various parties work together to look for solutions wherever possible.
20. I am also conscience that the existing planning permission(s) for the site are temporary in nature, and the Applicants are keen to ensure continuity of planning permission, if that is possible. The scheme before the Inquiry here is seeking what is, in effect, permanent planning permission.
21. To that end, and mindful of the time constraints that the Applicants consider exist in relation to the temporary nature of the existing planning permission, I have sought to expedite the Inquiry process as much as is possible.
22. Concurrently, I have been mindful, at all times, of the importance of interested parties having a genuine opportunity to be involved in the process in order to assist the Inquiry. This is a careful balance to make, but I consider that the process thus far strikes that balance appropriately.
23. I trust that all parties to the process will continue to assist me, as the decision-maker, to ensure that the process continues to be fair, open and impartial.

## **Main Issues**

24. The following, in my view, are the main issues to be considered in respect of the application at the present time (as set out on page 8 of 42 and paragraph 36 of the SOM):

- i) *the effects of the development on the character and appearance of the area; and,*
- ii) *the effect of the development on the local landscape, including on the Wye Downs National Landscape (formerly Area of Outstanding Natural Beauty (AONB)); and,*
- iii) *the effects of the development on heritage assets; and,*
- iv) *the effect of the development on local biodiversity and/or ecology; and,*
- v) *the effect of the development on the local traffic network; and,*
- vi) *effects of the development in terms of noise, lighting, and air quality on the living conditions of existing and future occupiers of nearby residential dwellings; and,*
- vii) *the effect of the development on agricultural land; and,*
- viii) *Whether or not the application makes adequate provision for infrastructure; and,*
- ix) *The overall planning balance.*

## **The Venue**

25. The venue for the Inquiry is due to be:

**Council Chamber, International House, Dover Place, Ashford, Kent  
TN23 1HU**

## **Site visit**

- 26. I have visited the site externally – visiting the local area on Thursday 25 September 2025.
- 27. I think that it would be beneficial if I could undertake an accompanied site visit on the IBF and BCP site itself.
- 28. My suggestion is that this takes place on Wednesday 3<sup>rd</sup> December 2025. Whilst noting that the site is operational, but also the need for propriety, I suggest that the site inspection within the site itself takes place accompanied by a representative of the Local Planning Authority. I also suggest that a representative from each of the Rule 13 Parties (and Statutory Parties) may attend should they wish to.
- 29. I raise this at this stage, given that I am not aware of what procedures and/or security clearance may need to be put in place to facilitate that part of a site visit.
- 30. The Applicants should also ensure that if there is a need for any Health & Safety matters and or PPE during the site inspection, this should be relayed to myself and the other attendees as soon as possible.
- 31. Given the issues in this case, I will also undertake unaccompanied elements to the site inspection. This may take place on other days and/or times between now and the Inquiry closing. This may include visits to various parts of the local area, including the Kent Downs National Landscape and

viewpoints set out in the submitted written evidence and/or informed by my traversing the local area.

32. I will also endeavour to undertake an unaccompanied site inspection after dark to the local area before the Inquiry closes as some of the issues raised refer to this; both in close and further proximity to the site.

## Dealing with the Evidence

33. I intend on holding the Inquiry as a face-to-face event. However, given that many matters have already been identified within the SOM, the process is likely to be slightly different from that typically associated with, say, planning appeal Inquiries which you may be more familiar with.
34. Openings and Closings: If you consider that submitting either, I would appreciate if these could be provided in writing please. If they exceed more than 20 pages, a short (500 word) summary should be provided.
35. I should preface this by saying that it is for each party to determine how they wish to present their cases, and the evidence which they rely upon to support their case. The following are suggestions only.
36. My suggestions is that Statement of Cases are formulated in two ways:

- i) If you **support** the scheme, then you could detail how the 95 points raised in the SOM have been addressed.

Completing this in a fashion similar to that set out in the SOM would assist the Inquiry and ensure that evidence and or information is submitted that addressed those points.

It may also be of assistance to provide, as appendices to the SOC where necessary and of assistance, any documents written by 'experts' where that supports and or explains further your response to the questions and queries part of the SOM.

There is already a considerable number of documents submitted relating to this case.

Therefore, **brevity** and **directness** in the submitted supporting documents would be greatly appreciated. We do not, for example, need a repetition of the whole *Framework* but rather focus on the specific chapters or paragraphs you need to in order to assist the explanation of your point(s).

It is not known as to whether other parties will be represented by advocates or not. Or that these advocates will necessarily wish to cross examine any witnesses providing such evidence (whether as Proofs and or supporting SOC documents). Though it should be noted that certain parties, as set out in Rule 21 (7) are entitled to cross examine persons giving evidence.

Should any party with the entitlement wish to exercise it, then they should inform me via the Crown Development Team no later than **midday Wednesday 26 November**.

All parties should be aware that, regardless of whether cross-examination is due to take place or not, there would still be a need for any party submitted information to the Inquiry to be prepared to provide answers to questions that I, or other interested parties, may have. I will lead any such process.

- ii) If you **object** to the scheme, then your SOC could provide details of why you object or your concerns, the basis for this position, and how that objection might be mitigated, militated or overcome (through the use of planning conditions or alterations to the scheme for example)

37. In terms of all and any written evidence – including SOC and/or Proofs of evidence, please can all expert witnesses ensure that their Proofs are provided in electronic formats – ideally in pdf form– and that **all** pages and paragraphs are numbered.
38. It would be helpful if these could be provided in a font size of no less than 11pt. I will re-iterate my earlier point; brevity, to the point and succinctness of answering the questions and/or providing your case will be of greatest assistance to the Inquiry.

### **Inquiry Format**

39. With regard to the format of the Inquiry, at all time this will be carried out following the Inquiry Rules for Crown Development Applications, of which there is a high degree of discretion given to the presiding Inspector to run the event in the way that is of most assistance to their considerations.
40. I will, nonetheless, seek to ensure that everyone has an opportunity to be heard – whether by written or oral submissions – in the process.
41. Regardless of the method of representation, all representations before the Inquiry are valid and will be considered.
42. However, in the main, and subject to how parties intend on presenting their cases (whether by Proofs or SOC plus Supporting Documents) it is most likely that the Inquiry will follow the following programme:
- **Openings by Applicants**
  - **Openings by LPA**
  - **Openings by Rule 13 and or other Statutory Parties**
  - **Oral representations by other Interested Parties** – where that party/person has made a number of points in their written representation, these should seek to seek to focus on one or two main points which they wish to convey to the Inspector/Inquiry. If there is a large number of speakers, then I would urge people to consider working together in order that we can make best use of Inquiry time. If there are a large number of speakers (and you

need to pre-register to speak before the Inquiry via the Crown Development Team at the Planning Inspectorate) then I may need to limit the time for each speaker. With that in mind, I would suggest that any speakers make sure that they have written copies of their oral representation, so that if time is short, this can be submitted in lieu of the full oral submission.

- **Accompanied site inspection (with Applicants, LPA, R13, and any Statutory Parties)**
- **Round table sessions on each main issue** (guided by the question/queries on main issues), led by the Inspector (and assisted by the advocates/representatives of the main parties)
- **Session discussing any suggested conditions** (a list of agreed suggested conditions should be provided with the LPA/Applicants SoCs)
- **Session discussing Planning Obligations** (this should be informed/assisted by a CIL Compliance/planning obligations compliance document created by the LPA demonstrating the planning policy basis for securing any obligations sought/provided)
- Any applications for **COSTS**
- **Closings by main parties (R13 Parties, Statutory Parties, LPA and finally Applicants)**

43.If there is a need for any further documents to be submitted to address points which arise during the Inquiry, then these should be discussed at the Inquiry – including any timetable for their submission and ensuring that interested parties are able to view them – before the Inquiry closes.

44.It is unlikely the any documents submitted after the Inquiry closes will necessarily be accepted.

45.Review of progress on addressing specific questions / queries on main issues (pages 8-31 SOM and listed from 1 – 95)

#### **Close PIM**

46.Thank you in advance for your continued assistance in this case. The Pre Inquiry Meeting is now closed.

C Parker    INSPECTOR                      11 November 2025

---

#### **Actions / outcomes**

- Applicants and LPA to agree when Applicants CIL statement is to be submitted to LPA in order that they can submit the LPAs CIL Compliance Statement



- National Highways to submit Circular 01/2022 Strategic Road Network
- KCC (Highways) to submit Kent Local Transport Plan document
- Clarity that Inquiry will open on **Tuesday 2 December 2025**, and all parties (including for example local residents) should seek to **attend on this day** if possible so that if it finishes earlier than anticipated they will have had an opportunity to speak at the Inspectors discretion.
- All parties are able to discuss and contact each other in order to narrow the issues wherever possible. As the Inspector, I do not necessarily need to be involved in each and every stage or discussion.
- Agreed Statement of Common Ground (SOCG) can be of assistance to the Inquiry if these can be submitted.
- Applicants intends on submitting a draft Statement of Case (SOC) w/c 17 November – this will be copied to the other main parties – and may act as a indication of progress on the addressing of the 95 questions and main issues.
- The Inquiry is likely to follow a hearing format, albeit with 'entitled' parties able to cross-examine should that be of assistance to examination of the evidence.
- The principal vehicles for the submission of 'evidence' is the SOC's with focussed supporting documents, which address the 95 questions, rather than the typical format of Proofs which are tested by cross-examination.
- All parties should, nevertheless, anticipate that questions may be asked at the Inquiry on either the SOC's, the supplementary documents and/or in relation to the 95 questions, and therefore should be prepared to do so.

**Outline Agenda**

- i) Introductions by the Inspector and advocates/spokesperson
- ii) Review of Main Issues (Page 8 pdf of SOM)
- iii) Skeleton outline of what Proofs and witnesses party's intend on Calling
- iv) Discussion on format of Inquiry sessions (Cross-examination, roundtable, or written representation)
- v) Review of the progress on addressing 'Specific questions or queries on main issues' (Pages 8 to 31 pdf, and listed from 1 to 95).
- vi) Close

All parties should continue to work together so as to narrow the issues wherever possible.

**Costs**

All parties at the Pre-Inquiry Meeting and Inquiry, should be aware that, in some circumstances, costs can be applied for, and awarded, in relation to Crown Development Applications.

Further details of this can be found at:

[www.planningportal.gov.uk/planning/appeals/guidance](http://www.planningportal.gov.uk/planning/appeals/guidance) .

Whilst this refers to appeals, similar principles apply to Crown Development Applications.

Such situations may arise where one party considers another party has acted unreasonably in the lead up to or during the Inquiry, and in acting unreasonably this has caused unnecessary or wasted expense on the party making the application for costs. It is not an opportunity to recover general costs on the basis that you support or oppose the scheme, and / or the costs that you have incurred in supporting your case at or leading up to the Inquiry. The general expectation is that parties will cover their own costs in participating in the process.

Additionally, you should be aware that the appointed Inspector may, on their own initiative, make an award of costs, in full or in part, if they judge that a party has behaved unreasonably resulting in unnecessary application expense.

# Timetable

## Expedited Approach

Week	Date (w/c)	Activity
1	20 October 2025	Notify Applicants and Interested Parties of procedure under s319A TCPA (Art 44 CDAO25).  Inspector's discretionary Statement of Matters (Rule 14 CDAR25) to be issued Tuesday 21 October.
2	27 October 2025	By Monday 27 October – Rule 13 Parties requests to be submitted and approved/declined by PINs.  Notification of Pre-Inquiry Meeting
3	3 Nov 2025	4 weeks notice of notification of Inquiry venue etc (Rule 18) for entitled to attend parties  [Note in this case all parties notified at this stage]
4	10 Nov 2025	Pre-Inquiry Meeting may be held (Rule 15).  [Two weeks prior notice required.]
5	17 Nov 2025	
6	24 Nov 2025	Statement of Cases to be submitted before the end of five weeks from starting date of Inquiry being set (Rule 13) by App and LPA by Monday 24 November.  Other persons Statement of Case(s) (Rule 13 Party) to be submitted within four weeks of request approved (Rule 13(4)) by Monday 24 November.  Proofs of Evidence to be submitted (Rule 20)(4)(b)
7	1 Dec 2025	Inquiry Opens?
8	8 Dec 2025	Inquiry resumes?
9	15 Dec 2025	
10	22 Dec 2025	Christmas week
11	29 Dec 2025	31 December 2025 – SDO date when use should cease.
12	5 Jan 2026	Post-Inquiry, Decision Notice anticipated to be issued no later than 9 January 2026