

Planning and Development

Ask for: Mr Roland Mills

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The Crown Development Applications Team
Planning & Environmental Applications Service
The Planning Inspectorate

By e-mail to: crownapplications@planninginspectorate.gov.uk

Our Ref: OTH/2025/1437

Your Ref: CROWN/2025/0000002

Date: 25/09/2025

Dear Sir / Madam

LOCATION: SEVINGTON INLAND BORDER FACILITY (IBF), MERSHAM, ASHFORD, TN25 6GE

ISSUE: APPLICATION CONSULTATION RESPONSE REF: CROWN/2025/0000002

PROPOSAL: 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.

I refer to the consultation in respect of the above and thank the Crown Development Applications Team for the agreed extension of time to enable the Council to provide its response.

Following a Report to the Planning Committee 24/09/2025, the Council's agreed response is set out further below and should be read in conjunction with the Report (copy already provided). Where appropriate, cross-references to specific paragraphs within that Report are made to assist the Inspectorate.

THE COUNCIL'S RESPONSE

1. LANDSCAPING

The Council requests that an enhanced soft landscaping scheme, including planting plans, details of proposed on-going management & responsibilities and clear timescales for implementation of agreed works, is secured by appropriate planning condition(s). The soft landscaping scheme should include, but not be limited to;-

(i) commitment to review and enhancement of the soft landscaping scheme beyond the northern secure IBF fence frontage to J10A, through pro-active collaboration with National Highways as necessary, to address the large number of planting failures on that land which currently result in a loss of screening of the IBF with resultant adverse visual impacts (including significant light spill during dusk and dawn periods as well as during hours of darkness) – **refer to paragraphs 123-131 of the Report,**

(ii) review, enhancement and strengthening of landscaping forming the bund created on the eastern side of Highfield Lane as well as its immediate hinterland (and located outside the defined red-line application site but on land identified as being within the applicant's ownership and control) in order to create a stronger properly maintained and demarcated tree belt edge to the proposed 'buffer zone' to Mersham – **refer to paragraph 132 of the Report,**

(iii) areas of landscaping opportunity within the site both located beyond the secure fence to the IBF as well as areas within the securely fenced IBF as per the suggestions set out in paragraphs – **refer to paragraphs 112-118 of the Report,** and

(iv) improved landscaping within the viewing corridor in order to lift its visual character including the suggestions of tree planting, understorey planting and wildflower – **refer to paragraphs 119-122 of the Report.**

In all respects, the Council consider that the applicant must be required to adopt best horticultural practice to ensure that planting is developed to maturity.

The Council would wish improved landscaping proposals to be the subject of prior liaison with the Council. The Council is open to discussion with the applicant as to how best to secure future maintenance and management of an acceptable approved scheme in order to ensure that a repetition of planting failures does not occur.

2. ECOLOGY

The Council requests that implementation of the submitted LMMP and LEMP, including provision of the habitat enhancement works within the first planting season following planning permission being granted is secured by appropriate planning condition – **refer to paragraphs 72-78 of the Report.**

The Council expresses some concerns that a condition assessment of the existing habitat has not already been carried out. Concerns are expressed that failure to satisfactorily reduce lighting overspill may have an impact on achievable BNG use of Sevington East.

3. BIODIVERSITY NET GAIN & SECURING SEVINGTON EAST AS AN UNDEVELOPED BUFFER

The Council welcomes the applicants' intention to provide and secure biodiversity net gain and the role that Sevington East will have in that respect. The Council requests that these matters are secured by the proposed Unilateral Undertaking and that the approach to BNG is one that ensures long-term maintenance – **refer to paragraphs 72-78 & paragraph 185 of the Report.**

4. STAFF TRAVEL PLAN & MISSED ACTIVE TRAVEL OPPORTUNITIES

The Council requests that an updated Staff Travel Plan to include a review of the success of the 2022 version with updated objectives, targets, measures and details of monitoring is secured by an appropriate planning condition. This is required in order to address the cumulative impacts of major development on air quality and to encourage the use of sustainable transport modes and active travel – **refer to paragraphs 168-169 of the Report.**

The Council would wish the updated Plan to fully investigate the reasons why only 5% of staff walk and cycle to work as well as to explore whether patronage of the Zeelo bus service would increase by expansion of the service geographically through the provision of a greater number of local pick-up points around Ashford.

The Council considers that allied with an updated Travel Plan staff appropriate facilities should be provided by the applicant including an appropriate number of secure and covered cycle parking spaces and the provision of good facilities for those cycling to work (storage of cycling clothing & kit, changing areas, ability to access shower).

Allied to an updated Travel Plan, the Council expresses its disappointment that funding for upgraded off-site PRow between the land shown edged in blue and the nearby village of Mersham is not proposed and considers that this must be provided if the government is serious about encouraging active travel. A clear local opportunity exists to demonstrate commitment and leadership in this respect through funding of the necessary local infrastructure. The upgrading of the PRow from Highfield Lane to Blind Lane already demonstrates what can be done in this respect. The Council considers the applicant should revise the proposed s.106 Undertaking to include funding to KCC, in its role as the local highway authority, to take forward such PRow upgrades.

5. HIGHWAYS

The Council requests that mitigation necessary to the J10A gyratory junctions with the A20 (both east & west bound) to resolve current and anticipated queuing issues is secured with proactive liaison taking place between the applicant, National Highways and Kent County Council – **refer to paragraph 162 of the Report.**

The Council consider that the applicant must liaise with KCC, in its role as local highway

authority, to mitigate any other known or anticipated impacts on the local highway network.

The Council consider that the entrance to the staff car park on Church Road is one where tailgating is expected to impact on highway safety and requests that the entry arrangements be reviewed. The Council consider that the carriageway should be raised at the crossing point in order to make it safer for users and to slow vehicle speeds.

6. LIGHTING

The Council requests that a clear and detailed Implementation Plan, informed by the recommendations for measures to reduce lighting impacts set out in the External Lighting Assessment must be secured by appropriate planning condition(s). This Plan must be one that balances the requirements for on-site safety and security with the need to mitigate adverse effects on the residential amenity of local residents, the rural character of the surrounding area (including the National Landscape) and nature conservation/biodiversity enhancement. The Council considers it must take into account areas of the site that are infrequently used and require the site operator to significantly reduce or totally extinguish lighting in those areas when not in use – **refer to paragraphs 84-105 of the Report.**

7. NOISE

The Council requests that an updated Noise Impact Assessment is secured by an appropriate planning condition. The Noise Impact Assessment should include but not be limited to:-

- (i) additional investigation of low frequency noise from HGVs,
- (ii) tonal noise from refrigerated HGVs,
- (iii) reversing beepers,
- (iv) clanging of curtain sider poles and horns,
- (v) the use of the perimeter road to the south of the site used by the HGVs to exit the site and
- (vi) take into account other relevant submissions made as part of the public consultation in 2024.

The Noise Impact Assessment should provide information showing the number of days per annum the emergency parking areas ('Romeo' and, especially, 'Tango') has been used since the site opened and should include measures to mitigate identified noise impacts, including but not limited to consideration of alternative HGV routing within the site to avoid use of the perimeter road, particularly during the nighttime period, given its location relative to homes as sensitive noise receptors - **refer to paragraphs 138-152.**

The Council considers that if the 'Tango' parking emergency parking area is to be used with any regularity for such purposes then Acoustic Barrier mitigation to avoid adverse noise impacts on nearby residents as a result of that usage must be secured by planning condition.

8. AIR QUALITY

The Council requests that a Site Management Plan is secured by appropriate planning condition. [REDACTED]

The Council considers that the Site Management Plan should include but not be limited to measures to mitigate impacts on air quality, including a requirement that vehicles do not idle for excessive periods of time and that an appropriate number of electric hook-up points are provided for refrigerated vehicles when parked in the different areas of the site. The Council request that site management actively direct vehicles to those hook up points. That approach will assist with both air quality as well as reduce noise impacts – **refer to paragraphs 138-152 of the Report.**

The Council also requests that a minimum 20% supply of Electric Vehicle Chargers should be provided in staff parking areas (utilising active 7.5KW chargers) and HGV parking areas (ultra-fast chargers and/or other best infrastructure for HGVs) in order to facilitate a transition to use of that technology with attendant environmental benefits including air quality.

The Council considers that on-going Air Quality reporting should be secured by condition requiring liaison with the Council's Environmental Protection Team to ensure that monitoring equipment utilises best practices and technology in order to ensure accurate air quality results.

9. FIBRE TO THE PREMISES

The Council notes that an FTTP statement has not been provided with the application and that no indication has been given in respect of the inability of FTTP to be provided. The Council consider the proximity to the Sevington exchange means that FTTP should be a viable proposition. If that cannot be provided, then alternative provision of superfast broadband should be secured by planning condition – **refer to ABC Economic Development comments in the Consultation Response section of the Report.**

10. NUTRIENT NEUTRALITY

The Council note that the applicant's proposal does involve overnight accommodation and that, notwithstanding, effluent from the employment use of the site would continue to be tankered away. The Council note that PINs become the competent authority under the Habitats Regulations – **refer to paragraphs 79-83 of the Report.**

11. SIGNAGE AND SAT-NAV

The Council welcomes recent signage improvements designed to reduce instances of the rural road highway network being incorrectly used to access the site and welcomes on-going collaboration between National Highways and Kent County Council to explore all sensible signage improvements on the strategic and local highway network including liaison with sat-nav as necessary to ensure guidance given to drivers in respect of the access from the J10A link road is correct – **refer to paragraphs 163-165 of the Report.**

12. IMPACT ON HERITAGE ASSETS

The Council welcomes the approach in the draft unilateral undertaking to ensure that capital funds are finally able to be released to the Diocese – **refer to paragraphs 175-181 of the Report.**

The Council consider the Unilateral Undertaking must include a commitment to fund the reestablishment of PRow through the viewing corridor should future use circumstances arise which obviate the need for a secure fence. The viewing corridor is an important component of the setting of St. Mary's Church and a PRow passing through that area gives that corridor further meaning as part of the historic route to the nearby village of Mersham enjoyed by the local community. The Council agrees with the views expressed by KCC in this respect and requests that the funding provisions that were originally discussed with the DfT in the 'stalled s.106 agreement' are now updated and provided in an amended Unilateral Undertaking.

13. UNILATERAL UNDERTAKING

The Council supports the other non-heritage obligations covered by the Undertaking. As per further above, the Council considers that the funding of PRow upgrades to an all-weather specification to connect the IBF to the village of Mersham and PRow reestablishment should be included in the Unilateral Undertaking.

14. CELEBRATING ARCHAEOLOGICAL FINDS

The Council would wish to see archaeological finds fully referenced in post-excavation reports and celebrated by information boards and signage as appropriate and in appropriate publicly accessible locations in order to celebrate the history of Sevington – refer to **paragraphs 192-194 of the Report.**

15. RESTRICTING THE USE APPLIED FOR

The application proposal involves a sui generis use of land and the Council request that any grant of planning permission is subject to an appropriate planning condition that ensures that alternative uses of the site (or the diminution of certain uses accompanied by the intensification of others – for example, involving general HGV parking uses similar to the periodic use of the 'Romeo' and 'Tango' parking areas) are brought within planning control so that the acceptability of such other uses involving HGV parking is able to be considered by the Council.

Figure 14 at paragraph 179 of the Report has accidentally been reproduced 'handed'. The image is shown correctly below.



Paragraph 25 of the report contains an error – the staff car park access is not manned.

Yours sincerely

Roland Mills

Strategic Development & Delivery Manager & (acting) Planning Applications Manager