

Appendix 17 - Heritage Technical Note

**Applicant Statement of Case - Appendices
CROWN/2025/0000002 Sevington Inland Border Facility**

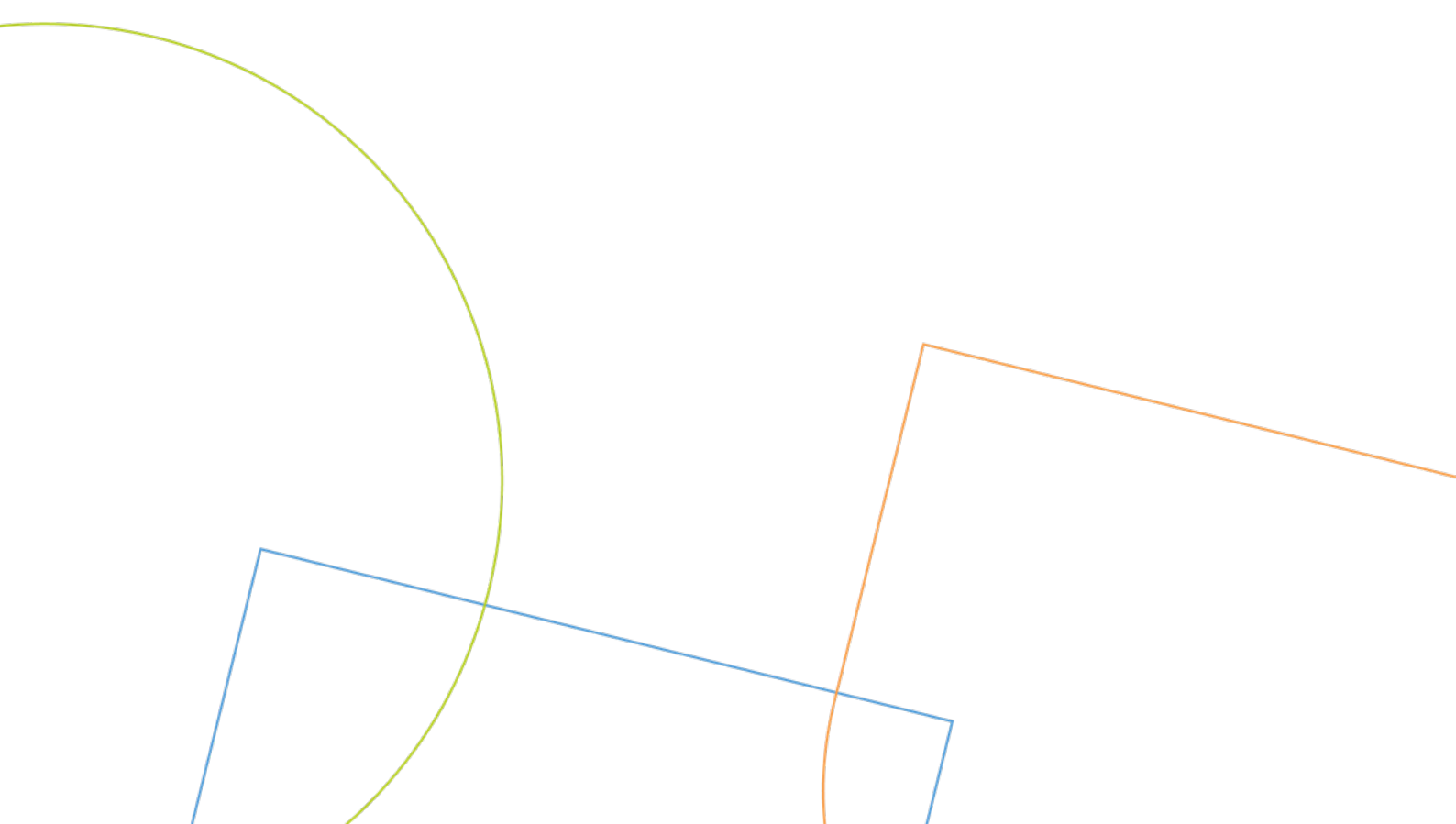
Sevington Inland Border Facility

Technical Note: Heritage & Archaeology

On behalf of Waterman Infrastructure & Environment Limited

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Application Reference: CROWN/2025/0000002



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Issue Sheet

Sevington Inland Border Facility

Technical Note: Heritage & Archaeology

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1 Consolidated Summary

- 1.1.1 This Technical Note summarises the heritage and archaeological aspects relating to the permanent operation of the Sevington Inland Border Facility (IBF). It draws directly on the submitted Environmental Statement (ES Chapter 10), the Heritage Statement, and the Archaeological Statement, and provides clarifications requested by the Planning Inspector. No new surveys or assessments have been undertaken and no changes arise to the conclusions of the original application submission.
- 1.1.2 The ES identifies a limited number of designated heritage assets with potential for indirect (setting) effects. Of these, only the Grade I listed Church of St Mary, Sevington, experiences a significant moderate adverse effect, equating to less than substantial harm in NPPF terms. The applicant judges this to lie within the mid-range of the less-than-substantial spectrum. All other identified designated assets experience minor, non-significant effects, and no impacts are identified to non-designated heritage assets.
- 1.1.3 Mitigation measures, comprising landscaped bunds, structural planting, timber fencing and the retention of a viewing corridor between the Grade I churches at Sevington and Mersham, reduce the influence of IBF operations on the surrounding landscape. Interpretive features within the landscape strategy, including the reconstructed barrow and information boards, support understanding of the historic environment.
- 1.1.4 Archaeological impacts were fully mitigated during construction of the temporary facility through evaluation, excavation and recording under agreed Written Schemes of Investigation. No further below-ground impacts arise from the permanent operation of the IBF. The Royal Observer Corps (ROC) monitoring post is retained in situ with no considered change to its condition or legibility.
- 1.1.5 The consultation responses from Historic England, Ashford Borough Council and Kent County Council have been addressed. The heritage and archaeological effects of the IBF remain limited, localised, and focused principally on the setting of St Mary's Church.

2 Introduction

- 2.1.1 This Technical Note was prepared by Alice James BA (Hons) MSc MCIfA, Technical Director at Lanpro with input from Edward Lee BA (Hons), MSc, Principal Historic Environment Consultant. Alice James is a Technical Director with over 10-year professional experience of working within the Historic Environment sector. Alice has delivered the cultural heritage assessments on a wide range of projects of different scales and complexities. Over the last 5 years Alice has worked as the lead heritage consultant on four Nationally Significant projects, including acting as the historic environment expert witness.
- 2.1.2 This note has been prepared by Lanpro on behalf of Waterman Infrastructure & Environment Limited. It provides a summary of the heritage and archaeological evidence relevant to the application for the permanent operation of the Sevington Inland Border Facility (IBF) (Appeal Reference: CROWN/2025/0000002).
- 2.1.3 The note responds to the heritage related matters raised by the Planning Inspector and should be read alongside the submitted Environmental Statement (ES) Chapter 10, the Heritage Statement (Appendix 10.1), and the Archaeological Statement (Appendix 10.2).
- 2.1.4 The note sets out:
- A summary of the methodology used to assess potential impacts to the historic environment as detailed in the Environmental Statement, Heritage Statement and Archaeological Statement;
 - A restatement of the potential direct and indirect (i.e. setting) impacts caused by the Scheme on heritage and archaeological assets; and
 - A response to consultation representations and detailed clarification of Inspector's matters.

3 Approach to Assessment

3.1 Methodology

3.1.1 The assessment methodology used in ES Chapter 10 was informed by:

- The National Planning Policy Framework (2024) definition of significance and harm;
- Historic England guidance, notably GPA3 The Setting of Heritage Assets and relevant Advice Notes; and
- The Design Manual for Roads and Bridges (DMRB) heritage assessment framework (sensitivity–magnitude–significance matrix).
- ClfA Standard and Guidance for Historic Environment Desk-based Assessment (2020)

3.1.2 Records of designated and non-designated heritage assets were collated for within the IBF and 1km from the IBF site boundary to assess potential direct or in direct (setting) impacts. The study area for archaeological assets covered a 500m area from the IBF site boundary. The study areas are considered appropriate for assessments of a similar nature and aligns with professional practice, as well as NPPF Paragraph 207. They are consistent with the scoping review and have considered any potential designated and non-designated heritage assets with potential intervisibility or contextual relationship with the IBF. Figures in ES Chapter 10 and the Heritage Statement list and map these assets. A heritage asset map is appended to the Statement of Case.

3.1.3 ES Chapter 10 was informed by:

- Ancient Monuments and Archaeological Areas Act 1979 — <https://www.legislation.gov.uk/ukpga/1979/46> (Retrieved 12/12/2024)
- NPPF Guidance: Conserving and Enhancing the Historic Environment — <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment> (Retrieved 13/12/2024)
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- Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

3.1.4 The Heritage Statement (ES Appendix 10.1, June 2025) provides an assessment of setting impacts that follows the staged approach advocated by Historic England (GPA3; 2017): identifying the significance of the asset; defining the extent to which setting contributes to that significance; identifying potential change; and assessing the level of effect. Visual, auditory and experiential change arising from the permanent IBF operations were considered, including traffic, lighting, bulk/massing of retained structures, and changes to rural character.

3.1.5 In line with NPPF Paragraph 207, Ashford Local Plan Policies ENV13 and ENV15, Historic England and ClfA guidance, the Kent Historic Environment Record (HER) and National Heritage List of England (NHLE) were consulted using the study areas provided above. The archaeological assessment also included a field evaluation in the form of geophysical survey (Archaeological Statement, June 2025, para 5.4.6), and three phases of evaluation trial trenching (Mott McDonald, 2020, 2022).

3.2 Consultation and Scoping Influence on Methodology

3.2.1 The Scoping Review undertaken by Temple on behalf of Ashford Borough Council required the ES to provide a:

- clear identification of all assets;
- consideration to operational lighting and activity;
- assessment of indirect setting change; and
- clarification of archaeological mitigation already completed.

3.2.2 The Kent County Council ('KCC') Heritage Team raised specific interest in the Bronze Age barrow, surviving Anglo-Saxon features, and securing interpretation measures related to the Royal Observer Corps (ROC) post, located east of the IBF site boundary, and landscape strategy.

3.2.3 Consultation advice was used to inform the production of ES Chapter 10. Where required subsequent discussions were undertaken with the relevant Local Authority.

4 Assessment Findings

4.1 Heritage Assets

4.1.1 The assessment in ES Chapter 10 concluded that the IBF would not cause any direct impact to any heritage assets.

4.1.2 The assessment identified that the IBF had the potential to cause indirect (setting) impacts to the following heritage assets:

- Church of St Mary - Grade I listed (NHLE 1233902)
- Church of St John the Baptist - Grade I listed (NHLE 1276693)
- Court Lodge - Grade II listed (NHLE 1276463) and Barn - Grade II listed (NHLE 1276464)
- Ashdown Ashdown Cottage - Grade II listed (NHLE 1233932)
- Orchard Cottage - Grade II listed (NHLE 1233763)
- Maytree Cottages - Grade II listed (NHLE 1233936)
- Bridge Cottage - Grade II listed (NHLE 1233764)
- Ransley Cottage - Grade II listed (NHLE 1233755)
- Royal Observer Corps (ROC) underground monitoring post, Sevington (MKE15672, TR04SW126)

4.2 Archaeological Assets

4.2.1 Archaeological mitigation works on site were completed as part of the construction of the temporary facility. All archaeological remains within affected construction areas were fully excavated, recorded, and sampled under approved Written Schemes of Investigation (WSI).

4.2.2 There are no further potential impacts to buried archaeological remains as a result of the IBF, and the ES scoped out any impacts to archaeological assets as a result of the change to a permanent IBF operation.

4.2.3 Residual archaeological work relates to the completion of post-excavation analysis, reporting and archiving.

4.2.4 A meeting was held with the Senior Archaeological Officer at KCC on 16 Oct 2024 and it was agreed that the Cultural Heritage chapter would be supported by an Archaeological Statement technical appendix but archaeological assets did not warrant full assessment in the ES because the operation phase would not impact archaeological assets. The Archaeological Statement confirms that no ongoing groundworks or impacts to heritage assets are proposed and that these can therefore be scoped out of further assessment (ES Appendix 10.2). It concludes:

- No further physical archaeological impacts will arise from the permanent operation;

- Remaining tasks are limited to post-excavation analysis, reporting and publication;
- The Royal Observer Corps post is retained in situ.

4.2.5 The ES and LEMP (LEMP drawing refs 419419-MMD-01-MO-DR-L-3206 & 419419-MMD-01-MO-DR-L-3032) outline on site interpretation including information boards, relating to the interpretive barrow construction, with other features including the heritage trail, and the viewing corridor.

4.3 **Assessment of impacts and effects**

4.3.1 ES Chapter 10 identified potential for adverse impacts to six designated assets due to changes in their rural setting arising from the permanent IBF operations:

- Church of St Mary - Grade I listed (NHLE 1233902)
- Court Lodge - Grade II listed (NHLE 1276463) and Barn - Grade II listed (NHLE 1276464)
- Ashdown Cottage - Grade II listed (NHLE 1233932)
- Orchard Cottage - Grade II listed (NHLE 1233763)
- Maytree Cottages - Grade II listed (NHLE 1233936)
- Bridge Cottage - Grade II listed (NHLE 1233764)

4.3.2 Mitigation measures embedded in the design include bunding, strategic planting, timber fencing, and retention of a viewing corridor along a historic route between the two Grade I churches (Church of St Mary in Sevington and Church of St John the Baptist in Mersham), reducing harm to the minimum reasonably achievable. These measures are recognised in both the Heritage Statement and the landscape documentation and are considered to reduce harm to the minimum reasonably achievable.

4.3.3 A significant moderate adverse effect (less-than-substantial harm in NPPF terminology) was identified to the Grade I Listed Church of St Mary (NHLE 1233902).

4.3.4 A minor adverse effect was identified to the remaining six designated heritage assets, which is not considered significant.

5 Consultation

- 5.1.1 This section provides concise responses to heritage-related comments made during consultation, including written representations. Responses are signposted to material in the ES (Chapter 10 Cultural Heritage), the Heritage Statement (Appendix 10.1), and the Archaeological Statement (Appendix 10.2).

5.2 Historic England

- 5.2.1 Historic England agreed with the applicant's assessment that the proposed development would result in less than substantial harm to the significance of the Grade I listed Church of St Mary, Sevington. Their consultation response noted that while the applicant places this harm within the middle of the "less than substantial" range, Historic England consider it to fall towards the upper end of that spectrum.

Response:

- 5.2.2 The Applicant acknowledges Historic England's position. The Applicant considers the assessment as submitted to be robust and proportionate and in line with appropriate policy and guidance. The applicant would further draw attention to the mitigation proposed as a means of offsetting the degree of harm considered by Historic England. The applicant highlights the proposed landscape enhancement, planting maturation, and improvements to the viewing corridor, are specifically designed to reduce the visual influence of the IBF on the rural setting of St Mary's Church once established.

5.3 Ashford Borough Council

- 5.3.1 Ashford Borough Council (ABC) endorsed the comments made by Historic England, agreeing that the proposed development results in less-than-substantial harm to the significance of the Grade I listed Church of St Mary, Sevington, and noting that this harm lies towards the upper end of that scale. ABC emphasised the sensitivity of the rural landscape setting and the importance of the historic relationship between the two Grade I churches.

Response:

- 5.3.2 The Applicant acknowledges ABC's position and the alignment with Historic England. The assessment identified less-than-substantial harm to St Mary's Church, Sevington, arising from changes to the rural setting that the permanent operation of the IBF would cause (see Heritage Statement: Sevington Inland Border Facility, June 2025, p 42).
- 5.3.3 Mitigation measures, including bunding, structural planting, timber fencing, and the retention of the viewing corridor are considered to reduce harm to the minimum reasonably achievable. (Heritage Statement, June 2025, Appendix 10.1).
- 5.3.4 The Applicant agrees that the viewing corridor and proposed interpretive measures mitigate operational effects and retain an understanding of the historic landscape.
- 5.3.5 Archaeological impacts were fully mitigated prior to construction, and no residual archaeological effects arise from the permanent operation.

5.4 Kent County Council

5.4.1 Kent County Council (KCC) requested clarity on:

- The status of archaeological mitigation and the completeness of post-excavation programmes.
- The significance and treatment of the ROC monitoring post.
- Proposals for an interpretive barrow and interpretation boards linked to archaeological findings.
- The relationship between the two Grade I churches and whether the development affects historic intervisibility.

Response

5.4.2 The Archaeological Statement confirms that all intrusive archaeological mitigation has been completed, and that no further below-ground impacts arise from the permanent operation (Archaeological Statement, June 2025, Sections 4–6). Post-excavation analysis is ongoing in accordance with agreed WSIs.

5.4.3 The ROC post is retained in situ with no harm identified (ES Appendix 10.2). The interpretive reconstructed barrow and information boards are identified within the LEMP strategy (SOFT LANDSCAPE WORKS MAINTENANCE AND MANAGEMENT PROPOSALS – 10 YEARS, Appendices A, Drawing Number: 419419-MMD-01-MO-DR-L-3206). Their detail and delivery mechanism are proposed to be secured by a planning condition.

5.4.4 The historic relationship between the Grade I listed Churches of St Mary (Sevington) and St John (Mersham) was assessed in ES Chapter 10. The visual corridor is retained between the two churches along the historic route that connects them (ES Ch.10, Section 10). The Applicant considers that mitigation measures have been carefully considered and are reasonable and proportionate. As such, the Applicant considers the mitigation proposed has reduced harm to the minimum reasonably achievable.

6 Clarifications

- 6.1.1 This section provides clarification on specific heritage and archaeological matters raised through consultation responses and the Inspector's Matters.
- 6.1.2 No new evidence, surveys or assessments have been undertaken or are necessary to support this Technical Note and no amendments have been made to the conclusions presented in the Environmental Statement (ES Chapter 10), the Heritage Statement (Appendix 10.1), or the Archaeological Statement (Appendix 10.2).
- 6.1.3 In response to the Inspector's request for the heritage map illustrating designated assets relative to the site, this was prepared and had been appended to the Statement of Case.
- 6.1.4 The clarifications below provide further explanation, context and signposting to the submitted material.

6.2 Archaeological Mitigation and Post-Excavation Status

- 6.2.1 All intrusive archaeological fieldwork required to mitigate construction impacts on below-ground remains was completed prior to or during the initial construction phase of the Sevington Inland Border Facility (IBF). The results of evaluation and excavation are set out in the Archaeological Statement (Appendix 10.2).
- 6.2.2 The Planning Inspector queried the status of post-excavation analysis. It is understood this work is ongoing in accordance with the approved WSI. The post-excavation works form part of normal archaeological procedure, and no additional fieldwork is required.
- 6.2.3 The permanent operation of the IBF does not generate any further impacts on the archaeological resource.

6.3 ROC Monitoring Post

- 6.3.1 The ROC monitoring post located within the IBF site boundary was included in the heritage baseline. It was assessed as a non-designated heritage asset of local historical significance (Heritage Statement, Appendix 10.1). Its significance derives from its historical interest having a Cold War function and its level of survival.
- 6.3.2 The ROC post is retained in situ. No construction or operational impacts associated with the IBF has affected its fabric, condition, or legibility, nor would any new direct impacts be caused as a result of the change to a permanent operation.
- 6.3.3 As such, no harm to the ROC post was identified in the submitted assessment.

6.4 Reconstructed Barrow

- 6.4.1 The interpretive reconstruction barrow referenced by KCC Archaeology and in the Inspector's Matters is a landscape and public-engagement feature and is intended to reference the general Bronze Age presence identified within the wider archaeological landscape.

- 6.4.2 The feature sits within the landscape surrounding the site and will be maintained in line with the Soft Landscape Works Maintenance and Management Plan – 10 Years (BCA Design: Landscape Architects, 27th January 2025). Its purpose is interpretive and educational, in line with KCC’s recommendation to increase public understanding of the archaeological narrative of the site.

6.5 Interpretation Boards

- 6.5.1 Interpretation boards relating to both the archaeological findings and the ROC post form part of the overall soft landscape and public information proposals (LEMP, Drawing Ref 419419-MMD-01-MO-DR-L-3032).
- 6.5.2 Boards are anticipated to be located along the internal pedestrian routes and near accessible site boundaries where context can be provided without operational conflict. It is understood that the final positions would be determined through condition stages.
- 6.5.3 Interpretation boards form part of the broader mitigation and public-engagement approach and do not introduce heritage harm. They respond directly to KCC Heritage Conservation’s request for public-facing heritage interpretation.

6.6 Viewing Corridor Between St Mary’s, Sevington and St John’s, Mersham

- 6.6.1 Clarification has been sought on the purpose and function of the “viewing corridor” referred to in consultation responses and the ES. This is a designed landscape feature within the on-site mitigation package that preserves a defined, open visual channel between the two Grade I listed churches in Sevington and Mersham.
- 6.6.2 The corridor responds to the acknowledged historical relationship between Sevington and Mersham parishes by following the route of a historic trackway recorded on 1838 parish tithe map. While the churches are not intervisible along this exact axis today due to landform and vegetation, the retained openness helps avoid introducing additional visual or perceptual barriers in this part of the landscape.
- 6.6.3 The landscape strategy ensures planting within this corridor is restricted in height and form to preserve its intended function. Its purpose is mitigation-led and was considered within the assessment of effects on the setting of St Mary’s Church.

6.7 Degree of Harm to St Mary’s Church, Sevington

- 6.7.1 The applicant’s Heritage Statement concludes that the development results in less than substantial harm to the significance of St Mary’s Church, Sevington, primarily through changes to rural character and the experiential qualities of the landscape.
- 6.7.2 The applicant assessed this harm as lying within the mid-range of the less than substantial harm scale. Historic England and Ashford Borough Council agreed with the classification but considered the harm to fall at the upper end of that spectrum.
- 6.7.3 Landscape mitigation, including structural planting, bunding, timber fencing and the viewing corridor, provides a long-term reduction in visual and experiential effects. The

Applicant considers the mitigation proposed has reduced harm to the minimum reasonably achievable.

6.8 Non-Designated Heritage Assets

- 6.8.1 All non-designated heritage assets within and around the site, including the ROC post and former agricultural field boundaries, were assessed in the Heritage Statement.
- 6.8.2 No indirect or direct impacts were identified.

7 Conclusion

- 7.1.1 This Technical Note provides a concise and definitive summary of the heritage and archaeological position for the Sevington Inland Border Facility (IBF), drawing together the submitted Environmental Statement (ES Chapter 10), the Heritage Statement (Appendix 10.1), and the Archaeological Statement (Appendix 10.2), alongside clarifications requested in advance of the inquiry.
- 7.1.2 The Heritage Statement identified a limited number of designated heritage assets where there is a potential for indirect (setting) impacts. Potential impacts arise from changes to the rural character and experiential qualities of the wider landscape.
- 7.1.3 Only one asset was identified where there was a potential for significant moderate adverse effects (less than substantial harm in NPPF terms) which was St Mary's Church, considered to fall within the mid-range of the less-than-substantial scale. Historic England and Ashford Borough Council consider the harm to fall towards the upper end of the same scale.
- 7.1.4 No impacts were identified to non-designated heritage assets.
- 7.1.5 Mitigation measures which include landscaped bunds, structural planting, timber fencing, and the retention of the viewing corridor between the Grade I Listed churches in Sevington and Mersham, reduce the visual and experiential influence of operational activity.
- 7.1.6 Archaeological impacts arising from construction have been fully mitigated through evaluation, excavation and recording, undertaken in accordance with the agreed Written Scheme of Investigations. The permanent operation of the IBF results in no further below-ground impacts, and there are no residual archaeological effects.
- 7.1.7 The ROC monitoring post is retained in situ with no change judged to its condition or legibility.
- 7.1.8 Consultation responses, including those from Historic England, Ashford Borough Council, KCC Heritage Conservation have been reviewed and addressed. Clarifications relating to interpretation boards, the interpretive barrow, the ROC post, and the viewing corridor are provided in Chapter 5 and introduce no change to the assessment.

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