

Planning Statement

Sevington Inland Border Facility

13th June 2025



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1. Introduction

- 1.1 This Planning Statement has been prepared by Jones Lang LaSalle ('JLL') on behalf of Department for Transport ('DfT'), Department for Environment, Food and Rural Affairs ('Defra') and His Majesty's Revenues and Customs ('HMRC') (collectively 'the Applicant'), in support of a full planning application for Crown Development for the continuing operation of Sevington Inland Border Facility, Mersham, Sevington, Ashford, TN25 6GE ('the Site').
- 1.2 This application for Crown Development is submitted pursuant to section 293D of the Town and Country Planning Act 1990 (as amended).
- 1.3 The proposals seek to secure full planning permission for the existing Sevington Inland Border Facility ('SIBF' or 'IBF'), including the Border Control Post ('BCP'), on the Site. These facilities were originally delivered under temporary consent, provided for under The Town and Country Planning (Border Facilities and Infrastructure) (EU Exit) (England) Special Development Order 2020 (hereafter referred to as 'SDO'). Four separate written submissions were made to the Secretary of State under Article 4(1)(a) of the SDO with subsequent relevant approvals being obtained. This legislation allowed for the rapid deployment of critical border control measures following the UK's exit from the European Union ('EU'). The temporary consent, as allowed for under Article 4(1)(a) of the SDO, is due to expire on 31st December 2025.
- 1.4 Notwithstanding the temporary nature of the original planning permission granted through the SDO, there remains a critical requirement for the continuing operation of the IBF and BCP. Securing the continuation of the existing operations on the Site is of high strategic importance and would serve the critical purpose of border security in the national interest. The Site remains strategically vital to facilitate border security checks, including documentary and physical checks taking place on goods entering and exiting the UK, alongside sanitary and phytosanitary ('SPS') checks at the BCP, to provide protection in respect to the UK's biosecurity and public health.
- 1.5 In addition to the crucial requirement for the continuation of operations at Sevington IBF in the national interest, there are significant socio-economic and environmental benefits associated with the current operation that will be retained if planning permission were secured for the IBF's longer term operation. Specific environmental benefits include the voluntary securing of

significant biodiversity net gain ('BNG') across the IBF Site and neighbouring 'Sevington East' site, which is also owned by the Applicant. A detailed Economic Benefits Statement has been prepared in support of this full planning application, which serves to distil the wider socio-economic benefits of the development. A summary of scheme benefits has been included in Chapter 9 of this Planning Statement.

- 1.6 This planning application has been prepared in the context of meaningful and proactive engagement with the Ministry for Housing, Communities and Local Government ('MHCLG'), Ashford Borough Council ('ABC'), Kent County Council ('KCC') and other statutory consultees, and an extensive consultation exercise has been undertaken with other interested parties and stakeholders. The Applicant is committed to continuing engagement and consultation with statutory bodies, local communities and stakeholders throughout the planning application process.
- 1.7 The Applicant has voluntarily progressed an Environmental Impact Assessment ('EIA') in order to robustly assess whether the development is likely to have significant effects on the environment. An Environmental Statement ('ES'), technical appendices and Non-Technical Summary have been prepared in support of this planning application, alongside various other technical documents that were scoped out from assessment as part of the EIA.
- 1.8 This Planning Statement has been prepared in order to provide a comprehensive overview of all aspects of the proposed development and an assessment of its appropriateness against the development plan and other material considerations.

Description of Development

- 1.9 Pursuant to this application, full planning permission is sought for the following description of development:

'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.'

Format of the Planning Application

1.10 This planning application is comprised of and supported by the following suite of drawings and documents:

Discipline	Deliverable	Author
Assessed within ES		
EIA	ES	Waterman
Air Quality	Air Quality chapter, including Air Quality Assessment	Waterman
Landscape & Visual Impact	Landscape & Visual Impact Assessment, including Landscape Character Assessment	Waterman
Noise & Vibration	Noise & Vibration chapter	Waterman
Ecology	Ecology & Biodiversity chapter	Waterman
Transport	Transport & Access chapter	Waterman
Heritage & Archaeology	Cultural Heritage chapter	Waterman
Socio-Economic	Socio-Economic chapter	Stantec
Technical Appendix to ES		
Archaeology	Archaeological Statement	Lanpro
Ecology	Habitat Regulations Assessment	Waterman
Heritage	Heritage Statement	Lanpro
Noise & Vibration	Operational Noise Assessment	Waterman
	Road Traffic Noise Assessment	Waterman
Other Planning Application Deliverables		
Architecture	Site Location Plan	Chetwoods
	Block Plan	Chetwoods
	As-Built Drawings (floor plans, roof plans, elevations, sections)	Chetwoods
	Building Reference Plan	Plowman Craven
	Off Plan Area Measurement Report	Plowman Craven
	Ancillary Building Photo Sheets	Plowman Craven
	Site-Wide Cross-Sections	Chetwoods
	Design & Access Statement	Chetwoods
Biodiversity	Biodiversity Net Gain Report	Waterman
Ground Conditions	Preliminary Risk Assessment	Waterman
Sustainability	Energy Statement, including Energy Modelling	Waterman

Discipline	Deliverable	Author
	Sustainability Statement	Waterman
Flood & Drainage	Flood Risk Assessment	Waterman
Landscape	Landscape Masterplan & Detailed Planting Plans	BCA
	Landscape Maintenance & Management Plan, including previously approved SDO Landscape Environmental Management Plans ('LEMPs')	BCA
Lighting	External Lighting Assessment	Waterman
	Lighting Inspection Report	Waterman
Planning	Covering Letter	JLL
	Planning Statement	JLL
	Statement of National Importance	JLL
	Application Form, Ownership Certificate, Notices	JLL
	Schedule of Deliverables	JLL
	Unilateral Undertaking	TLT
Economic	Economic Benefits Statement	Stantec
Public Engagement	Statement of Community Involvement	Kanda
Transport	Transport Assessment, including Traffic Surveys & Modelling	Waterman
	Travel Plan (appendix to Transport Assessment)	Waterman
Trees	Arboricultural Impact Assessment	Waterman
Utilities	Utilities Statement	Waterman
Waste	Operational Waste Management Strategy	Waterman

Structure of this Planning Statement

1.11 The scope of this Planning Statement is as follows:

- Section 2 describes the Site and surrounding area;
- Section 3 describes the planning history;
- Section 4 outlines the consultation undertaken;
- Section 5 explains the proposals;

- Section 6 summarises the relevant planning policy;
- Section 7 sets out the planning assessment of the proposals against policy;
- Section 8 provides an overview of the proposed planning obligations;
- Section 9 sets out the benefits of the proposals; and
- Section 10 provides the conclusions

2. Site and Surrounding Area

Site Description

- 2.1 The Site falls entirely within the jurisdiction of ABC, and is located to the south-east of Ashford, at Junction 10a of the M20, approximately 50 miles south-east of London and approximately 22 miles west of Dover.
- 2.2 For the purpose of this planning application, the Site comprises a single parcel of land, formerly known as ‘Stour Park West’, and covering a land area of approximately 43.4 hectares (‘ha’). Stour Park West comprises an operative IBF and BCP, benefitting from temporary permission under the SDO. For the purposes of this planning application, ‘Stour Park West’ is hereafter referred to as ‘Sevington West’.
- 2.3 It is noted that a second parcel of land, formerly known as ‘Sevington East’ and covering a land area of approximately 42.3 ha, falls within the same ownership, but is excluded from the red-line boundary for the purposes of this application, given that no built development is situated on or is proposed for this land. Sevington East consists of undeveloped farmland and has been subject of landscaping and biodiversity enhancements. These landscaping and biodiversity enhancements were approved through two separate LEMPs, as approved through receipt of relevant approvals required under the SDO.
- 2.4 The IBF serves as a location for checking of goods transiting to and from the UK. The Site includes parking areas for Heavy Goods Vehicles (‘HGVs’) and other vehicles, as well as security measures and facilities to enable the checking of vehicles’ contents and goods entering and exiting the Site.
- 2.5 Accordingly, the Site consists largely of hardstanding, together with industrial type units / sheds, modular buildings, refrigerated semi-trailers, containers, staff car parking, access and estate roads, drainage ponds, soft landscaping and associated site infrastructure. The development, as consented through the SDO, has been built out in line with the SDO.
- 2.6 For goods vehicles, Site ingress and egress is facilitated via the A2070 and an access point on the Site’s northern boundary. A second access point on the Site’s northern boundary, connecting to the A2070, provides emergency access only. The staff car park is accessed

from the west via Church Road which, in turn, connects to the southbound approach of the A2070 (Bad Munstereifel Road). An additional access point connecting to Highfield Lane was designed as an emergency exit, and additional pedestrian access points connecting to Highfield Lane and the two overflow HGV parking areas serve operational purposes.

- 2.7 A public right of way ('PROW') previously passed through the Site, but this has now been lawfully diverted or 'Stopped-Up' so as to extend up Highfield Lane and around the Site. The PROW extending through Sevington East was upgraded from a footpath to a bridleway as part of the temporary permission.
- 2.8 On-Site vegetation is dispersed throughout in pockets and corridors, and consists largely of grass, trees, wildflowers, a limited number of shrubs, and riparian planting in association with the ponds.
- 2.9 The location and general layout of the Site are demonstrated in Figure 1 below.



Figure 1. Aerial view of the Site (Google Maps 2024)

Surrounding Area and Accessibility

- 2.10 The local context exhibits a mixed-use character, with surrounding development consisting of residential dwellings, farm buildings, farmland, St Mary's Church, large-scale retail (Ashford Retail Park and Tesco Extra), industrial units, logistics facilities, Ashford International Truck Stop, Network Rail land and the high-speed railway line (Eurostar, Southeastern and Southern).
- 2.11 The Site is highly accessible via major highways infrastructure, being directly connected to the A2070 which, in turn, connects to the M20 at Junction 10a just a short distance from the

Site access point. The Site is strategically located adjacent to a key HGV route between the Port of Dover, Eurotunnel and the rest of the country, and this positioning allows minimal diversion from the strategic road network. This makes it an ideal location to capture vehicles with consignments that are moved through the Short Straits, so that they can be checked at the SIBF.

2.12 The Site also benefits from good proximity to Ashford International train station, from where connectivity to the wider public transport network is facilitated.

2.13 The Site, within its local context, is shown in Figure 2 below.



Figure 2. Site Context (Google Maps 2024)

Site-Specific Designations

- 2.14 The Site is classified as Grade 2 Agricultural Land, and is situated within a Landscape Character Area. The Site is considered to have Archaeological Potential, is within a Mineral Safeguarding Area, and the southern boundary of the Site is affected by Wharves and Rail.
- 2.15 Pursuant to the Environment Agency's ('EA') Flood Map for Planning, the Site is within Flood Zone 1, indicating a low probability of flooding from rivers and the sea. Based on the mapping of long-term flood risk, the Site is at very low risk of flooding from surface water, rivers or the sea, and flooding from groundwater or reservoirs is identified as being unlikely in this area.
- 2.16 These designations are further considered in conjunction with the relevant supporting policies in the latter sections of this Planning Statement.

3.Planning History

3.1 The Secretary of State for MHCLG made The Town and Country Planning (Border Facilities and Infrastructure) (EU Exit) (England) Special Development Order 2020, on 24th September 2020. Planning permission was granted through Article 3(1) of this statutory instrument in respect to various changes of use of land, development and operations for the provision of border facilities and infrastructure.

3.2 Article 4(1)(a) of the SDO prescribes a pre-commencement condition requiring a written submission to the Secretary of State for approval for the use of the land and the operations comprised in the development, and subsequent receipt of the relevant approval. Four separate relevant approvals were obtained by the Applicant, subsequent to written submissions, on 01st December 2020, 23rd December 2020, 24th November 2021 and 28th April 2022, accounting for evolving operational requirements). This permission covered a land area of c.67.5 ha (both the eastern and western parcels) and included the currently operative IBF and BCP. The temporary consent expires on 31st December 2025, and upon expiry the land is required to be reinstated. Key parameters of the temporary IBF (pursuant to the most recent relevant approval dated 28th April 2022) include the following:

- Up to 855 goods vehicle parking spaces;
- Capacity for 260 goods vehicles in 42 entry lanes;
- 357 staff car parking spaces;
- Formation of a new permanent access (main access to the M20 junction 10a link road) and an emergency access / small vehicle ejection point to the north, access off Church Road into the staff car park, emergency access points off Highfield Lane;
- Diversions and extinguishments to PROW;
- Erection of buildings and structures for border processing purposes of up to 34,500 sqm to a maximum height of 8.5m;
- 24 (19 permanent and five reserved) refrigerated semi-trailers covering an area of approximately 870 sqm;

- Security fencing and noise attenuation bunds and fences to a combined maximum height of 5m;
- CCTV columns to a height of 8m;
- Lighting columns to a height of 12m;
- Drainage and all associated engineering;
- Site preparation works;
- Hard and soft landscape works; and
- Site-wide ancillary infrastructure.

3.3 This facility is currently operative, although is not yet operating at full capacity.

3.4 Part of the land covered by the relevant approval (4) granted under the SDO is also within the scope of the outline planning permission (ref: 14/00906/AS) granted on 13th September 2017 for Stour Park West, for:

‘Development to provide an employment led mixed use scheme to, include site clearance, the alteration of highways, engineering works and construction of new buildings and structures of up to 157,616 sqm comprising: up to 140,000 sqm Class B8 (storage and distribution) use; up to 23,500 sqm of B1a/B1c Business (of which a maximum of 20,000 sqm of B1a); up to 15,000 sqm of B2 (general industry); up to 250 sqm of A1 (retail shops) and 5,500 sqm of Sui Generis to accommodate Kent Wool Growers together with ancillary and associated development including utilities and transport infrastructure, car parking and landscaping.’

3.5 The reserved matters for Phase 1A (ref: 19/00579/AS) were granted on 05th July 2019, for:

‘Approval of the appearance, landscaping, layout and scale of the ‘Phase 1A works’ being the works comprising the estate roads, the sustainable drainage system embedded within open space and the landscaping and layout of that open space (including measures specifically designed for ecological/biodiversity enhancement purposes within that open space).’

3.6 A Certificate of Lawfulness of Existing Use or Development (ref: 19/01099/AS) was granted on 15th August 2019, confirming that development had commenced in relation to outline

planning permission 14/00906/AS and associated Phase 1A works approved under reserved matters application reference 19/00579/AS.

3.7 The following table summarises the planning history of the Site.

Reference	Description	Decision & Date
14/00906/AS	Outline planning permission for Stour Park West, for an employment led mixed use scheme	Granted 13.09.2017
19/00579/AS	Reserved matters for Phase 1A, including estate roads, sustainable drainage & landscaping	Granted 05.07.2019
19/01099/AS	Certificate of Lawfulness, confirming that development had commenced in relation to Phase 1A	Granted 15.08.2019
'Relevant approval 1'	Relevant approval pursuant to the SDO for the IBF and BCP	Granted 01.12.2020
'Relevant approval 2'	Relevant approval pursuant to the SDO for the IBF and BCP, accounting for evolving operational requirements	Granted 23.12.2020
'Relevant approval 3'	Relevant approval pursuant to the SDO for the IBF and BCP, accounting for evolving operational requirements	Granted 24.11.2021
'Relevant approval 4'	Relevant approval pursuant to the SDO for the IBF and BCP, accounting for evolving operational requirements	Granted 28.04.2022

4. The Consultation Process

- 4.1 Consultation is a key pillar of the Localism Act 2011 and National Planning Policy Framework (2024) ('NPPF'), and is strongly encouraged by the Planning Inspectorate's ('PINS') Procedural Guidance for Section 293D Crown Development Applications and the Government's Planning Practice Guidance ('PPG') on Crown Development and Urgent Crown Development. All encourage developers to engage proactively with key stakeholders and local communities from the early stages of a scheme's development.
- 4.2 Accordingly, a comprehensive consultation and engagement strategy has been undertaken in advance of this application submission, which has directly informed the planning application submission.
- 4.3 The key stakeholders consulted to-date include MHCLG, ABC, KCC and National Highways officers, occupiers and owners of adjacent residential properties and throughout the wider area surrounding the Site, ward councillors, parish councillors, local groups and other key stakeholders.

Pre-Application Meetings with MHCLG

- 4.4 A request for pre-application advice was submitted to MHCLG on 11th November 2024, and formal acknowledgement was provided by letter dated 27th November 2024 from MHCLG (ref: PCU/24/001/SEV).
- 4.5 Regular meetings with the Planning Casework Unit were held throughout February – June 2025. These focused largely on the process and procedure around applications for Crown Development.
- 4.6 Given the advanced stage of the project at the time of the Statutory Instrument ('SI') being made, Procedural Guidance being published and the PPG being updated, prior to engaging with MHCLG around Crown Development, engagement had been had with ABC as the Local Planning Authority ('LPA'). This included a pre-application meeting and written response, as well as EIA Scoping. The details of these engagements are set out in the following subsections.

Pre-Application Meetings with ABC, KCC and National Highways

- 4.7 An initial meeting was held with ABC officers on 24th July 2024, and the first pre-application meeting was then held on 05th September 2024, with the written response following on 24th September 2024.
- 4.8 The pre-application written response highlighted the importance of economic development to ABC, and in response, an Economic Benefits Statement and Socio-Economic ES chapter have been prepared in support of this planning application, highlighting the significant and positive impacts associated with employment generation and wider economic activities generated by the Site.
- 4.9 A key area of discussion at the pre-application meeting related to Sevington East and its role as undeveloped land in safeguarding against coalescence between Sevington and Mersham (Local Plan Policy SP7), whilst delivering BNG. Sevington East has been excluded from the red-line boundary to clearly demonstrate that no development is proposed here pursuant to this planning application, and it is proposed to secure land at Sevington East for BNG purposes for 30 years via a legal mechanism, thereby safeguarding it against development.
- 4.10 In order to reduce the visual and environmental impacts associated with the facility, ABC officers recommended consideration of the opportunity for mitigations focused on lighting and soft landscaping. In response, an External Lighting Assessment, Landscape and Visual Impact Assessment ('LVIA'), Landscape Masterplan, Detailed Planting Plans and a Landscape Maintenance and Management Plan ('LMMP'), have been prepared as part of this planning application. As part of this, the LEMPs associated with the SDOs have been reviewed, and it is clarified that the Applicant is committed to delivering these landscape schemes, including through replacement of failed planting and implementation of landscaping where not yet planted. This includes within the viewing corridor between the church spires, which will be retained, and picnic tables have also been introduced here to provide for staff amenity. Although a reduction in the height of fencing was requested to be investigated, the investigations have revealed this will not be possible for reasons of operational security and, similarly, there are operational security reasons for limiting the type and scale of vegetation planting adjacent to anti-climb security fences.

- 4.11 Given the potential implications around nutrient neutrality, officers sought clarity as to the occurrence of overnight stays at the night, and in response it has been confirmed that the Site does not, and is not intended to, accommodate overnight stays – this does not form part of the operation for which planning permission is sought – and the Site does not include the facilities to accommodate overnight stays. Rather, overnight stays are provided for in very close proximity to the Site, at the adjacent Ashford International Truck Stop.
- 4.12 Officers requested clarification of the Site's role as part of the Kent Resilience Strategy ('KRS'), and it was clarified that the Site already serves a role in emergency situations by accommodating HGVs which would otherwise clog the Strategic Road Network ('SRN'). It is proposed that the use of the Site in emergencies as part of the KRS will continue.
- 4.13 As recommended by the relevant ABC officers, consultation has also been undertaken with National Highways and KCC Highways officers (meetings were held on 17th and 24th September 2024, respectively), and the Transport Assessment (including surveys and modelling) and Travel Plan have been carried out in accordance with the scope agreed by officers.

EIA Strategy and Scoping

- 4.14 ABC officers and statutory consultees were further engaged with via submission of an EIA Strategy and request for a Scoping Opinion. These served to agree the approach, baseline and content of the ES, which the Applicant voluntarily entered into in the interests of ensuring a robust assessment of whether the development is likely to have significant effects on the environment.
- 4.15 Two meetings were held with ABC officers and ABC's third-party reviewer, Temple Group, on 27th September and 16th December 2024, in advance of being issued with the Scoping Opinion on 19th December 2024, in accordance with which the ES has been prepared.
- 4.16 In summary, the EIA Scoping Report Review set out that the ES should include chapters and volumes on the topics of socio-economics, transport and access, air quality, noise and vibration, cultural heritage, ecology and biodiversity, and landscape and visual impact. It advised that, where a topic has been agreed to be scoped out of the EIA, this is on the basis that there will be no significant effects. The report stated that mitigation relied upon to scope out topic chapters should be captured in the ES mitigation summary.

Public Engagement

- 4.17 Public engagement was commenced in August 2024 and remains ongoing, involving multiple stages and various events and activities. A comprehensive approach to consultation was progressed, to ensure effective engagement across multiple statutory and non-statutory consultees and stakeholders.
- 4.18 Engagement events were held on 19th and 26th October, in advance of which flyers were distributed, letters sent to near-neighbours, door-knocking carried out with near-neighbours, an engagement website established, and social media adverts published. In addition, letters and meeting invites were shared with political and officer stakeholders at Borough, County, Parish and parliamentary level, plus local business and community stakeholders.
- 4.19 The first round of engagement focused on explaining to local stakeholders the intention to submit a full planning application seeking to permit the continuation of the existing operation, obtaining feedback from the local community on their experiences of living near the IBF, and identifying the key concerns of the local community for consideration as part of the technical assessments and investigations of potential mitigation measures.
- 4.20 Based on the feedback provided during the various events, meetings and conversations, and in writing via surveys, the website and email correspondence, the following key themes emerged:
- Residents felt there were lighting impacts, associated with the high visibility and ‘glow’ of the Site during the night, impacting dark skies and residential amenity for some occupants of adjacent residential properties.
 - Residents felt there were traffic impacts, associated with misdirected HGVs on local roads, and increased traffic on the highways network.
 - Residents felt there were landscaping issues, associated with some failed planting and other landscaping not having been delivered under the SDO, as well as suggesting there may be opportunities for enhanced biodiversity creation.
 - Residents felt there were noise impacts, associated with HGV movements on the Site, particularly at night-time, impacting on residential amenity.

- 4.21 A second round of community engagement events was held on 17th and 18th January, with a focus on summarising the issues that had been reported during the first round of engagement, and explaining how these issues had been investigated and related mitigations explored.
- 4.22 The key themes remained generally consistent with the first stage of engagement, and based on the discussions had, it was felt that attendees and respondents broadly welcomed the additional information provided and potential mitigations proposed for consideration. These included the potential to switch-off swim lane lighting when not operationally required, the implementation of a signage strategy across the surrounding highways network, and the implementation of the LEMPs and replacement of failed planting together with review of opportunities for additional landscaping and enhanced management / maintenance. These potential measures would be supported by comprehensive lighting assessment, traffic surveys and modelling, landscape review, ecological and biodiversity assessments, and noise monitoring and impact assessment. These technical assessments are detailed within the reports supporting this planning application.
- 4.23 Further details are provided in the Statement of Community Involvement prepared by Kanda, included within the planning application submission package.

5. The Proposals

5.1 Pursuant to this application, full planning permission is sought for the following description of development:

‘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.’

5.2 In summary, the proposals incorporate the following key components, consistent with what has already been developed on the Site:

- 984 goods vehicle parking spaces;
- Capacity for 240 goods vehicles in 42 entry lanes;
- 357 staff car parking spaces, including 14 accessible bays and three Electric Vehicle (‘EV’) charging spaces;
- Main access to the M20 junction 10a link road and an emergency access / small vehicle ejection point to the north, access off Church Road into the staff car park, emergency exit point onto Highfield Lane, additional pedestrian access points connecting to Highfield Lane and the two overflow HGV parking areas serving operational purposes;
- Buildings and structures comprising a total of 16,348 sqm Gross Internal Area (‘GIA’) / 17,277 sqm Gross External Area (‘GEA’);
- Space for 24 (19 permanent and five reserved) refrigerated semi-trailers;
- Security fencing and noise attenuation bunds and fences to a maximum height of 5m;
- CCTV columns;
- Lighting columns to a height of 12m;
- Drainage and all associated engineering;
- Hard and soft landscaping; and

- Site-wide ancillary infrastructure.

5.3 This facility has been built-out in accordance with the relevant approvals obtained under the SDO and, therefore, no physical works are required to be undertaken. Rather, the proposals would enable the retention of the existing facility in its current state.

5.4 Whilst fully built-out and currently operative, it is noted that the facility is not yet operating at full capacity, and that operations are anticipated to continue to intensify into the future, within the 'worst-case' thresholds assessed as part of the previous relevant approvals obtained under the SDO and this planning application.

5.5 Full details are provided in the Design and Access Statement and drawings prepared by Chetwoods. Photographs demonstrating the appearance of the as-built facility are shown in Figures 3 and 4.



Figure 3. Aerial view of the as-built IBF, looking from south-west towards north-east (HMRC 2024)



Figure 4. Aerial view of the as-built IBF, looking from north towards south (HMRC 2024)

Operations

- 5.6 IBFs became a necessity following the UK becoming a contracting party to the Common Transit Convention ('CTC') following its exit from the EU. Under the terms of the CTC and Transports Internationaux Routiers Convention ('TIR'), physical border controls for goods moving between the customs territories of Great Britain and the EU under transit became a requirement from the end of the EU Exit transition period. This involves documentary and a proportion of physical inspections on goods moving to and from the EU to maintain compliance.
- 5.7 These facilities act as a government office of departure (for outbound journeys) and destination (for inbound journeys), where hauliers can start and end journeys when moving goods in and out of the UK, under the CTC or TIR. The IBF enables HM Government ('HMG') to undertake the required level of inspections on import and export of freight from the UK to / from all third countries using any mode of transport to ensure excise, customs and VAT compliance (carried out by Border Force and Defra), the starting and ending of transit movements and stamping and licencing checks (Convention on International Trade in Endangered Species of Wild Fauna and Flora ('CITES') and carnets).
- 5.8 The Borders Target Operating Model ('BTOM') introduced a risk-based approach from April 2024, which will see annual BCP physical checks of approximately 8,700 for Products of Animal Origin ('POAO') and 37,800 for Plant and Plant Products ('P&PP') at the Short Straits. The BTOM also committed the UK to start inspections on live animal imports at BCPs for goods arriving from the EU, in line with the regime already in place for the Rest of World ('RoW') imports. Maintaining the biosecurity of the UK, at the point where the majority of the UK's food and live animals enters from the EU, is imperative.
- 5.9 In the instance that the operation of the IBF at the Site was to cease, there would be no away-from-port checks on customs compliance, CTC functions (meaning Traders could not meet their legal obligations), SPS, CITES or BEIS market surveillance; congestion at the Border would cause delays across the network; the Site would fail to support Phased and Full Customs Control in ensuring full control for goods movements; there would be no intervention to prevent smuggling and illicit activity; locations would not be available to enable HMG Partnerships to undertake the required level of inspections on import and export of freight; imported goods would not meet the relevant standards in food and product safety and disease

control; safety and security declarations on goods subject to SPS controls would not be supported; and, there would be no support for the continued flow of trade which contributes to the UK economy and facilitates trade within EU / RoW markets.

5.10 Accordingly, securing the continuation of the existing operations on the Site is of high strategic importance and would serve the critical purpose of border security in the national interest.

5.11 As well as supporting the operations of Defra, HMRC and Border Force, the capacity at the IBF would also complement ongoing work on DfT's KRS to address the issue of freight disruption. The KRS aims to develop a new holistic traffic management system that uses a combination of technology and increased site-based lorry parking capacity to remove regular queues off the SRN and onto sites where hauliers can wait with access to welfare.

Land Use and Hours of Operation

5.12 The use of the Site for an IBF and BCP constitutes a Sui Generis use class.

5.13 As noted above, this use of the Site is consistent with the SDO and, therefore, the use is already established on the Site.

5.14 The facility is required to operate 24 hours per day, seven days per week.

5.15 Although operative during the night-time period, no overnight stays are permitted at the Site. The Site does not provide facilities to support overnight stays, and benefits from being situated directly adjacent to Ashford International Truck Stop which serves this purpose.

Built Form and Area Schedule

5.16 The Site incorporates a variety of built form associated with the range of operational functions carried out therein, including industrial type units / sheds, modular office buildings and a variety of ancillary structures. The design and layout of buildings and infrastructure respond to the functional requirements of the respective Government departments operating on the Site.

5.17 The quantum of floorspace across the Site is summarised in the following table.

	GIA	GEA
Main buildings	15,824 sqm	16,690 sqm
Ancillary buildings	524 sqm	587 sqm
Total	16,348 sqm	17,277 sqm

Landscaping

- 5.18 In conjunction with the development consented via the relevant approvals obtained subsequent to the SDO, landscape works have also been undertaken across the Site, in accordance with the SDO-approved plans and LEMPs, although it is acknowledged that some planting has failed and some is yet to be implemented.
- 5.19 It is clarified that the Applicant is committed to delivering the LEMPs, including through replacement of failed planting and implementation of landscaping where not yet planted. This, as well as some additional soft landscaping and tree planting, is reflected in the Landscape Masterplan, Detailed Planting Plans and LMMP prepared by BCA and submitted as part of this planning application.
- 5.20 The result will be a network of soft landscaped borders, corridors and ponds throughout the Site and across Sevington East, incorporating a mix of amenity grassland, species rich wildflower meadow, trees, shrubs, hedgerows and aquatic planting.
- 5.21 Together these features will contribute to on-Site and off-Site (at Sevington East) habitat enhancement and biodiversity net gain.

Access, Parking and Servicing

- 5.22 The primary means of access to the Site for goods vehicles is facilitated via the M20 junction 10a link road. Another access point on the Site's northern boundary supports emergency access from and on to the M20 junction 10a link road. For staff, access to the car park is via Church Road.
- 5.23 An additional access point connecting to Highfield Lane was designed as an emergency exit, and additional pedestrian access points connecting to Highfield Lane and the two overflow HGV parking areas serve operational purposes.
- 5.24 A total of 357 car parking spaces are provided for staff, consolidated within the staff car park in the western region of the Site, and secure cycle parking is also provided within the Site with capacity for 60 bicycles.

6.Planning Policy Context

- 6.1 This application for Crown Development is submitted pursuant to section 293D of the Town and Country Planning Act 1990 (as amended).
- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals are determined in accordance with the development plan unless material considerations indicate otherwise, and this statutory duty is emphasised at NPPF paragraph 2.
- 6.3 The development plan for the Site consists of ABC's Local Plan 2030 (adopted February 2019) ('the Local Plan') and Kent Minerals and Waste Local Plan as amended by the Early Partial Review (2020) ('Minerals and Waste Local Plan').
- 6.4 Other material considerations for the planning application include the NPPF, PPG, and ABC's Supplementary Planning Documents ('SPDs'). There are no Neighbourhood Plans encompassing the Site.
- 6.5 This section does not re-state all policies but identifies the main policies of relevance when considering the proposed development. Additional policies are set out in a tabular format for completeness.

Local Plan

6.6 Pursuant to the Local Plan, the Site is subject to the following designations:

- Landscape Character Area;
- Grade 2 Agricultural Land;
- Mineral Safeguarding Area;
- Archaeological Potential;
- Wharves and Rail, affecting the southern part of the Site adjacent to the railway line;
and
- Affordable Housing Viability Zone.

6.7 Whilst Sevington East is excluded from the red-line boundary for the purpose of this planning application, it is noted that additional designations affecting the eastern parcel only include 'patches' of archaeology.

6.8 Although not directly related to the Site, it is also relevant to note designations affecting the surrounding area:

- Cemeteries and Closed Burial Grounds, to the north-west of the Site;
- Biodiversity Opportunity Area, to the east of the Site on the opposite side of the M20;
- Ancient Woodland, to the east of the Site on the opposite side of the M20;
- Site of Special Scientific Interest ('SSSI'), to the east of the Site on the opposite side of the M20;
- Nature Reserves, to the north-west of the Site on the opposite side of the A2070;
- Green Corridor, to the north-west of the Site on the opposite side of the A2070;
- Flood Zones 2 and 3, to the north of the Site on the opposite side of the A2070;
- Site Policy S16 'Waterbrook' (residential, commercial and commercial lorry parking facility), to the south-west of the Site on the opposite side of the railway line; and
- Site Policy S21 'Orbital Park' (B1, B2 and B8 uses), to the west of the Site on the opposite side of the railway line.

6.9 Nearby heritage assets include:

- Grade I listed Church of St Mary;
- Grade II listed Court Lodge;
- Grade II listed Barn about 20m south-east of Court Lodge;
- Grade II listed Ashdown and Ashdown Cottage;
- Grade II listed Orchard Cottage;
- Grade II listed Nos 1 and 2 Maytree Cottages;
- Grade II listed Bridge Cottage;

- Grade II listed Kingsford Hall;
- Grade II listed Longthorne Farmhouse;
- Grade I listed Church of St John the Baptist;
- Mersham Conservation Area, to the south-east; and
- Green Conservation Area, to the north.

6.10 Evidence gathering and preparation for Regulation 18 consultation on a new Local Plan was scheduled for Q3 2023, and as part of this a Call for Sites was held in September – November 2023. The next stage in the process will involve assessing the suitability, availability and achievability of sites for development, through a Housing and Economic Land Availability Assessment ('HELAA'). Following this, Regulation 18 consultation is expected to take place in the second quarter of 2025. Given the early stages of the emerging Local Plan, it would hold very limited weight for the planning application.

6.11 Therefore, the key policy considerations derive from the current Local Plan. Policies of relevance include the following:

Relevant Local Plan Policies

Policy SP1 - Strategic Objectives

Policy SP3 - Strategic Approach to Economic Development

Policy SP6 - Promoting High Quality Design

Policy SP7 - Separation of Settlements

Policy EMP1 - New Employment Uses

Policy EMP2 - Loss or Redevelopment of Employment Sites and Premises

Policy EMP6 - Promotion of Fibre to the Premises (FTTP)

Policy TRA3 (b) - Parking Standards for Non Residential Development

Policy TRA4 - Promoting the Local Bus Network

Policy TRA5 - Planning for Pedestrians

Policy TRA6 - Provision for Cycling

Policy TRA7 - The Road Network and Development

Policy TRA8 - Travel Plans, Assessments and Statements

Policy TRA9 - Planning for HGV Movement

Policy ENV1 - Biodiversity

Policy ENV3a - Landscape Character and Design

Policy ENV4 - Light Pollution and Promoting Dark Skies

Policy ENV6 - Flood Risk

Policy ENV8 - Water Quality, Supply and Treatment

Policy ENV9 - Sustainable Drainage

Policy ENV12 - Air Quality

Relevant Local Plan Policies

Policy ENV13 - Conservation and Enhancement of Heritage Assets

Policy ENV15 - Archaeology

6.12 Consideration of the proposals in the context of these relevant policies is provided in the following section.

NPPF

- 6.13 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development, stating that for decision-taking ‘sustainable development’ means approving development proposals that accord with an up-to-date development plan without delay, or where there are no relevant development plan policies, or the policies for the supply of land are out-of-date, granting permission unless the application of policies in the NPPF provides a clear reason for refusing the development proposed. Further, NPPF paragraph 39 states that decisions on proposed development should be proposed in a positive and creative way to secure developments that will improve the economic, social and environmental conditions of the area.
- 6.14 Paragraph 85 further advises that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.
- 6.15 NPPF paragraph 87 requires planning policies and decisions to recognise and address the specific locational requirements of different sectors.
- 6.16 Pursuant to NPPF paragraph 124, planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. This includes making as much use as possible of previously developed or ‘brownfield’ land.
- 6.17 With regards to considering the impact of a proposed development on heritage assets, paragraph 212 states that great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether

any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. In turn, paragraph 215 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

6.18 NPPF paragraph 109 outlines that transport issues should be considered from the earliest stages of development proposals, and paragraph 116 states that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

6.19 At paragraph 161, the NPPF states the planning system should support the transition to net zero by 2050, taking full account of climate change impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

6.20 The following chapters within the NPPF are relevant to the proposals:

Relevant NPPF Chapters	
2	Achieving sustainable development
4	Decision-making
6	Building a strong, competitive economy
8	Promoting health and safe communities
9	Promoting sustainable transport
11	Making effective use of land
12	Achieving well-designed places
14	Meeting the challenge of climate change, flooding, and coastal change
15	Conserving and enhancing the natural environment
16	Conserving and enhancing the historic environment

6.21 Consideration of the proposals in the context of these relevant chapters and paragraphs is provided in the following section.

7. Planning Assessment

7.1 This section provides an assessment of the proposals against the relevant development plan policies and material considerations, in order to justify the grant of planning permission.

Principle of Land Use and Development

7.2 The Site is currently occupied by an operational IBF, a type of infrastructure that was, and continues to be, of critical strategic national importance.

7.3 Notwithstanding the temporary nature of the original planning permission granted through the SDO, there remains a critical requirement for the continuing operation of the IBF and BCP. Securing the continuation of the existing operations on the Site is of high strategic importance and would serve the critical purpose of border security in the national interest. The Site remains strategically vital to facilitate border security checks, including documentary and physical checks taking place on goods entering and exiting the UK, alongside SPS checks at the BCP, to provide protection in respect to the UK's biosecurity and public health

7.4 As well as supporting the operations of Defra, HMRC and Border Force, the capacity at the IBF would also complement ongoing work on DfT's KRS to address the issue of freight disruption. The KRS aims to develop a new holistic traffic management system that uses a combination of technology and increased site-based lorry parking capacity to remove regular queues off the SRN and onto sites where hauliers can wait with limited access to welfare.

7.5 As well as being of critical importance to the nation's border security, the IBF represents a major investment in the Borough and is also a major employment generator for Ashford. The facility supports 941 direct jobs (819 Full Time Equivalent ('FTE'), and a further 205 across an active supply chain, together estimated to generate £38.1M in Gross Value Add ('GVA') per annum. With 59% of staff living locally within 10 miles, it is estimated that approximately 433 staff (377 FTE) are resident within ABC, receiving approximately £13.4M in wages per annum.

7.6 The proposals to allow the ongoing operation of this facility, would secure this investment within the Borough into the long term, ensuring that Ashford continues to benefit from the positive economic impacts and significant number of jobs generated by the facility. This

includes in association with ABC acting as the Port Health Authority. By allowing the operation to continue, the utilisation of existing infrastructure and efficient use of brownfield land would be supported.

7.7 Accordingly, the proposals align with ABC's strategic objectives (Local Plan Policies SP1 and SP3) by creating a range of employment opportunities, providing investment within the Borough, utilising existing infrastructure and making best use of brownfield land. Further, Local Plan Policy EMP1 conveys support for employment uses, subject to appropriately relating to the surrounding area and adjoining developments and suitably mitigating highways impacts. On the converse, Policy EMP2 resists the loss of existing employment uses, thus similarly supporting the retention of the IBF on the Site.

7.8 Accordingly, the principle of securing the continued operation of the IBF on the Site, as an employment-generating use and form of major economic investment, is fully supported at the national, regional and local levels.

Design and Layout

7.9 The Site incorporates a variety of built form associated with the range of operational functions carried out therein. The design and layout of buildings and infrastructure respond to the functional requirements of the respective Government departments operating on the Site.

7.10 As required by Local Plan Policy SP6, the design of the built form and Site layout support ease of movement and legibility for both vehicles and pedestrians throughout the Site. Safety and crime mitigation have been prioritised through the design, siting and specifications of fencing, external lighting, CCTV and landscape planting. Flexibility has been achieved through the use of modular buildings, and through the layout of hard standing areas across the Site. Local character has been responded to through the extensive landscaping scheme around the Site, and the setting back of built form away from the Site boundaries to reduce the associated visual impacts.

7.11 The various aspects of design are explored in the ensuing paragraphs.

Height, Massing and Scale

7.12 The height, scale and massing of all industrial-type buildings, office buildings and ancillary structures across the Site respond to their respective functions and the associated operational

requirements. The potential visual and amenity impacts associated with the built form and Site infrastructure have been softened through provision of significant setbacks from Site boundaries and the incorporation of a variety of planting and soft landscaping, particularly around the Site perimeter.

Design Approach and Materiality

7.13 The design and layout of built form and infrastructure across the Site responds to the operational requirements of the facility. As detailed in the DAS, the extensive use of lighter grey colouring on building elevations assists in reducing the visual scale of the buildings, as does the incorporation of horizontal grey bands on external office walls and fenestrations.

Landscape and Views

7.14 A LVIA has been prepared to analyse the key views towards the Site and the potential effects of the development on the landscape character and visual amenity of the Site surroundings, considering the landscape characteristics set out in Local Plan Policy ENV3a and the adopted Landscape Character SPD. Policy ENV3a states that regard should be proportionate, according to the landscape significance of the site.

7.15 The Site sits within a gently rolling lowland landscape of agricultural fields at the eastern edge of Willesborough and the land then rises towards the east. The Site contains limited vegetation, but the adjacent plots of land include boundary hedgerows and sporadic groups of vegetation. The urban fringe of Willesborough and south-east Ashford form the backdrop towards this part of the study area and define most of the local character at the west of the Site.

7.16 The urban setting north and west of the Site provides several intervening features that limit the visibility of the development from that direction. However, the development is visible from the immediate area at the west and around St Mary's church. The topography to the south allows for a few distant views from higher grounds but the intervening features screen the development substantially, allowing only glimpsed views. The eastern part of the study area has an undulating raising topography that allows more views from the farm fields and the edge of Mersham village. Overall, views towards the development are restricted to the immediate vicinity with a few mid and long range views outside the study area.

- 7.17 As a result of the topography and the urban setting adjacent to the development, the surrounding receptors experience views mostly to the immediate locations around the Site. Most medium to long distance views are restricted by intervening features. In visual terms, the localised significant effects are limited to residents in proximity to the development, and the users of adjacent PROWs.
- 7.18 The existing mitigation measures ‘designed in’ to the development assist to integrate the development with the surrounding landscape and reduce the significance of the visual amenity effects. However, the LVIA recommends that further mitigation would improve the visual effects of the high sensitivity users, and to this effect, additional landscape screening is proposed pursuant to this planning application.
- 7.19 Accordingly, through the LVIA, particular regard has been had to the landscape characteristics of the Site and its surrounds, including with respect to landform, topography, vegetation and habitats, fields, settlements, road and pedestrian infrastructure, historic features and built form, and the proposed mitigations in the form of additional landscape planting have been designed to enable the development to better integrate with the local landscape character, in accordance with the intent of Policy ENV3a.
- 7.20 Finally, the development is notable during the night hours from long uninterrupted views such as the Kent Downs National Landscape, however this is viewed in context with the surrounding illumination associated with Ashford. The associated lighting impacts are considered in the External Lighting Assessment, which also forms part of this planning application.

Heritage

- 7.21 The Site is situated in the general proximity of a number of Grade I and Grade II listed buildings and, therefore, a Heritage Statement has been prepared in support of this planning application.
- 7.22 The assessment finds that the development results in a permanent urbanising effect that changes the rural character of the area, by virtue of incorporating hardstanding, buildings and lighting as well as permanent noise and visual impacts from increased vehicle traffic. However, mitigation measures were employed during the construction of the temporary IBF

to lessen the indirect impacts to the nearby designated heritage assets. Some of these such as tree planting are yet to fully develop.

7.23 Overall, the assessment concludes that, under the terms of the NPPF, there is ‘no harm’ to the significance of one Grade I listed building (Church of St John the Baptist) and one Grade II listed building (Ransley Cottage), but ‘less than substantial harm’ to the significance of one Grade I listed building (Church of St Mary), within the middle of the scale, and six Grade II listed buildings (Court Lodge and Barn, Ashdown and Ashdown Cottage, Orchard Cottage, Maytree Cottages, Bridge Cottage).

7.24 Paragraph 215 of the NPPF is, therefore, engaged which states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use (echoed by Local Plan Policy ENV13). In accordance with Paragraphs 212 and 214 of the NPPF and Local Plan Policy ENV13, a balanced judgement will be required and weighed in the planning balance, given their significance and the merits of the proposed development, which are summarised in section 9 of this Planning Statement. A summary is set out below:

- The IBF is a major employment generator for Ashford, supporting 941 direct jobs (819 FTE), and a further 205 across an active supply chain. With 59% of staff living locally within 10 miles, it is estimated that approximately 433 staff (377 FTE) are resident within ABC.
- Direct and indirect (supply chain) jobs are together estimated to generate £38.1M in GVA per annum.
- Approximately £13.4M per annum in wages are received by residents within the administrative boundary of ABC.
- The IBF also supports local apprenticeships to support further professional development, including in the areas of leadership and operational department management.
- The operator of the IBF has established links with to the community, through a range of programmes delivering local social value initiatives. A Community Good Fund

supports local societal and environmental priorities, and over the 2023-2024 year, 148 volunteer hours and £1,700 were contributed to local communities and good causes.

- The IBF supports small and medium size enterprises ('SMEs') within the local community, reflected in a 2023-2024 spend of around £2.38M across 37 SMEs throughout the supply chain, producing a £637,769 social value return on investment.
- Mentorship programmes have been established with local suppliers, seeking to help mentee organisations break through inequalities and potential barriers, and a Training Suite has been established in order to provide training to over 55 SMEs and Voluntary, Community and Social Enterprises ('VCSEs') in the 2023-2024 year.
- Initiatives have been focused within the employee community, including around diversity and inclusion, mental health and wellbeing, training opportunities (including for disadvantaged groups), and carbon literacy.
- Through the proposed landscaping scheme, the proposals will contribute to significant on-Site and off-Site (at Sevington East) habitat enhancement and biodiversity net gain.

7.25 It is the Applicant's view that the strong breadth of public benefits outweigh the perceived less than substantial harm attributable to seven heritage assets (Grade I listed Church of St Mary, and six Grade II listed buildings, namely Court Lodge and Barn, Ashdown and Ashdown Cottage, Orchard Cottage, Maytree Cottages and Bridge Cottage).

7.26 It is also noted that the Site incorporates an undeveloped corridor facilitating unobstructed views between the spires of the Church of St Mary and the Church of St John the Baptist, respectively, and it is proposed that this corridor will be retained in order to preserve this view line.

Archaeology

7.27 Within the policies map supporting the Local Plan, the Site is identified within an area of archaeological potential, and adjacent to three archaeological sites – Sevington Church, Mersham Ditch and Mersham Linear Feature. An Archaeological Statement has been prepared as part of this planning application.

7.28 The development does not physically impact any designated or non-designated archaeological asset.

- 7.29 One non-designated heritage asset is located within the Site, the Royal Observer Corps underground monitoring post, however, this remains in situ as part of the development (consistent with the preferred approach set out in Local Plan Policy ENV15) and the scheme results in no harm to the asset.
- 7.30 Within the wider 500m search area there is one Scheduled Monument, which would not be impacted by the development.
- 7.31 The assessment has established that a programme of archaeological mitigation fieldwork was undertaken in advance of the construction of the temporary IBF, and subsequent post-excavation reporting, publication and archiving has been undertaken. No ongoing impacts will occur to archaeological assets on the Site.
- 7.32 Due to the implementation of the programme of archaeological mitigation, the operation of the development will have no impact to archaeological assets on the Site and will have no impact on the setting and significance of any archaeological assets within the surroundings. Local Plan Policy ENV15 and NPPF paragraph 207 are considered to have been satisfied.

Landscaping and Biodiversity

- 7.33 In conjunction with the development consented via the SDO and subsequent relevant approvals, significant landscaping works have been undertaken across the Site, in accordance with the SDO-approved plans and LEMPs, although it is acknowledged that some planting has failed and some is yet to be implemented.
- 7.34 It is clarified that the Applicant is committed to delivering the LEMPs, including through replacement of failed planting and implementation of landscaping where not yet planted. This, as well as some additional soft landscaping and tree planting, is reflected in the Landscape Masterplan, Detailed Planting Plans and LMMP prepared by BCA and submitted as part of this planning application.
- 7.35 The result will be a network of soft landscaped borders, corridors and ponds throughout the Site and across Sevington East, incorporating a mix of amenity grassland, species rich wildflower meadow, trees, shrubs, hedgerows and aquatic planting.
- 7.36 Together these features will contribute to on-Site and off-Site (at Sevington East) habitat enhancement and biodiversity net gain, in accordance with Local Plan Policy ENV1.

7.37 As the development was completed in advance of BNG becoming mandatory on 12th February 2024, under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), and given that no new development is proposed as part of this planning application, the de-minimis exemption is applicable, meaning that a mandatory BNG assessment is not necessary.

7.38 Notwithstanding, the Applicant has undertaken a voluntary retrospective assessment of BNG against the statutory metric, for both on-Site and off-Site (land at Sevington East) BNG, to be created via full implementation of the LEMPs and secured for a 30-year habitat management and maintenance period.

Amenity Impacts

7.39 The Site is situated in close proximity to a number of residential properties, for which the maintenance of a suitable level of amenity is an important consideration. The relevant corresponding policies are considered in the following subsections.

Sense of Enclosure, Privacy, Overlooking and Outlook

7.40 The majority of built form has been consolidated within the central region of the Site, allowing for significant setbacks from Site boundaries and the incorporation of a variety of planting and soft landscaping, particularly around the Site perimeter.

7.41 As a result, the development is not considered to give rise to impacts associated with sense of enclosure, privacy or overlooking, particularly once the proposed landscaping has been fully implemented and established.

7.42 Whilst it is acknowledged that the Site features in the outlook of surrounding residential receptors and for users of the surrounding highways and PROWs, associated impacts have sought to be mitigated through soft landscaping, and the resulting visual impacts are addressed within the LVIA which forms part of this planning application.

Daylight, Sunlight and Overshadowing

7.43 There are significant separation distances between buildings on the Site and all neighbouring residential properties and, therefore, the development does not give rise to daylight or sunlight impacts.

Noise and Vibration

- 7.44 Noise sources associated with the ongoing operation of the Site relate to fixed plant (including standby generators), break-out from buildings, and HGV movements around the Site, with the latter being observed as the dominant operational noise, and noise from fixed plant and break-out from buildings being comparably not significant.
- 7.45 During the daytime period operational noise emissions were assessed to be negligible based on highest hourly and maximum hourly HGV movements, accounting for prevailing ambient noise levels, distance attenuation and screening afforded by the existing acoustic fences and earth bunds on the Site.
- 7.46 During the night-time period, when ambient noise levels are lower, operational noise emissions were assessed to be predominantly negligible but with potential for minor adverse effects at a single property. Adverse effects are local, direct and considered to be intermittent, given the assessment is based on the highest average hourly HGV movements during both the day and night-time periods. At other periods the movement of HGVs is lower, especially during the night-time period when compared to HGV movements between 06:00-07:00. Taking account of the predicted change in ambient noise level, absolute predicted noise level and predicted level of effect – no moderate or major adverse effects- secondary or enhanced mitigation is not proposed.
- 7.47 Changes in road traffic noise, as a result of the development, are less than 1dB on all roads, except for the A2070 north of the Site (east of the Site access) where the predicted change in road traffic noise is less than 2dB. Noise from the M20 is the dominant source at the nearest receptors to this section of the A2070, and modelling demonstrates that the change in road traffic noise along this road link is unlikely to be realised at the receptors due to dominance of M20 road traffic noise and, therefore, the change is considered to be not significant.
- 7.48 Accordingly, with the existing and proposed mitigation measures, the ongoing operation of the Site is considered to not give rise to unacceptable noise impacts for surrounding receivers. The proposals therefore align with NPPF paragraph 187(e), which sets out the new and existing development should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of noise pollution, and paragraph

198(a) which states that development proposals should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.

Lighting

7.49 As detailed in the External Lighting Assessment and supporting Lighting Survey Report, lux levels recorded at the Site boundaries adjacent to residential receivers are of acceptable levels.

7.50 Notwithstanding, some issues have been identified associated with direct glare from luminaires and the visibility of upward light.

7.51 To address these impacts, considering both neighbouring residential receivers and the dark skies policy (Local Plan Policy EN4), the reports provide the following recommendations:

- Column luminaires to be fitted with baffles to remove the impact of direct glare;
- Consideration of dimming of luminaires to a lower wattage to create a lower average lux level and minimise the indirect light spillage;
- Review the capability of the lighting control system to assess the flexibility of switching off certain circuits at night; and
- Assess on-Site operations to determine areas for which external lighting may not always be necessary and control those areas accordingly, using the lighting control system to switch off certain circuits at night.

7.52 It is understood that an implementation plan to reduce lighting impacts, informed by these recommendations, is being prepared in collaboration with the Site operator, given the importance of continuing to meet the operational requirements of the Site.

Transport

7.53 The Site is highly accessible via major highways infrastructure, being directly connected to the A2070 which, in turn, connects to the M20 at Junction 10a just a short distance from the Site access point. For Goods Vehicles, Site ingress and egress is facilitated via the A2070 and an access point on the Site's northern boundary. A second access point on the Site's northern boundary connecting to the A2070 provides emergency access only. The staff car

park is accessed from the west via Church Road which, in turn, connects to the southbound approach of the A2070 (Bad Munstereifel Road).

7.54 The nature of the use for an operational IBF means that the Site must provide capacity to accommodate a large number of HGVs. The existing access arrangements have been designed to accommodate the required volume of HGVs without causing queueing or disruption to the external highways network, and the number of HGV parking spaces is commensurate with the bespoke requirements of the use. Although Local Plan Policy TRA9 seeks to limit HGV movements to appropriate times of operation given the context of a site, in this instance the unrestricted operation of the facility is required such that HGVs can be accepted on a 24/7 basis. This reflects the current operations, and the Site is particularly suited to accommodate these unrestricted HGV movements given vehicles are accepted directly from and discharge directly to the A2070 and, in turn, the M20, without passing through residential or other sensitive areas.

7.55 For staff, the provision of adequate on-Site car parking is important. It is proposed to retain the existing 357 staff car parking spaces, as this reflects the level of need, which is consistent with the approach advocated by Local Plan Policy TRA3(b) for Sui Generis uses. Sustainable travel measures will, however, be promoted through a Travel Plan, which has been submitted as part of this planning application in accordance with Local Plan Policy TRA8.

7.56 Within the Site, dedicated pedestrian routes have been provided connecting the staff carpark and areas of the Site frequented by staff on foot, in accordance with Local Plan Policy TRA5. In order to continue to encourage journeys on foot in the wider area surrounding the Site, the diversion of the PROW has already been lawfully completed, allowing pedestrians to safely navigate around the Site and move between the surrounding settlements.

Access

7.57 Goods vehicle access and egress is facilitated to and from the access point on the Site's northern boundary, via the signalised intersection on the A2070 Link Road, which permits vehicles to turn left into the Site from the A2070 westbound approach, and right out of the Site onto the A2070 eastbound approach. This ensures that goods vehicles utilise M20 Junction 10a, and not Junction 10.

- 7.58 Whilst the signalised intersection at the Site access point includes a right-turn lane from the eastbound carriageway of the A2070 Link Road, this is currently closed off so as to discourage vehicles from using Junction 10, but can be brought into use if required. This is intended to serve vehicles originating from the Ashford International Truck Stop, rather than vehicles from the wider highways network.
- 7.59 Signage on the surrounding highways network supports this access strategy, directing goods vehicles to Junction 10a, rather than Junction 10, and deterring goods vehicles from attempting to access the Site from the staff access point on Church Road.
- 7.60 As noted, staff access is facilitated directly to the staff carpark from Church Road, via a left or righthand turn at a priority T-junction on the A2070. Egress from the staff carpark is permitted via a righthand turn only onto Church Road and then a lefthand turn only onto the westbound carriageway of the A2070.
- 7.61 Access for cyclists and pedestrians is also facilitated via the staff access point on Church Road, which connects to existing footways and PROWs, and avoids potential conflict with goods vehicles.
- 7.62 A dedicated shuttle bus, operated by Zeelo, provides direct connections between Ashford International Railway Station, Ashford Park and Ride, and the Site, for commuting staff, and is operated free of charge. The service timetable is designed to align with staff shift patterns.
- 7.63 Emergency vehicles may access the Site via the goods vehicle or staff carpark access points, and an additional emergency-only access point is also located on the Site's northern boundary.

Highways Impacts

- 7.64 Traffic modelling of 10 junctions has revealed that only M20 Junction 10a is likely to experience a material impact from the proposals, with both the A20 eastbound and A20 westbound approaches forecast to experience increased queueing in 2026 and 2036. However, the modelling demonstrates that the junction would already be operating above its practical and actual capacity, respectively, in the 2026 and 2036 base scenarios, and likely to require mitigation of the associated queueing and delay, irrespective of the proposals at the Site.

7.65 The Transport Assessment recommends that potential measures to improve the operation of M20 Junction 10a and mitigate the impact of the proposals are discussed with National Highways and KCC.

7.66 With respect to the 2036 'horizon year' scenario, it is noted that the volume of traffic forecast from all committed developments is substantial across the study network. This committed development traffic results in some of the modelled junctions operating above capacity in the baseline scenario, with long queues that would extend back through upstream junctions. This is considered to represent a robust (and 'worst-case') scenario as it is considered likely that, in practice, not all of the cumulative development will come forward prior to 2036.

Car Parking

7.67 A total of 357 car parking spaces are provided for staff, consolidated within the staff car park in the western region of the Site. This is the only point on the Site that private cars are permitted.

7.68 The car parking provision includes 14 accessible spaces, and three EV parking bays sharing two chargers.

Cycle Parking

7.69 Secure cycle parking is provided within the Site, with capacity for 60 bicycles.

7.70 Staff lockers, showers and changing facilities are provided on-Site within staff welfare areas.

Deliveries and Servicing

7.71 Delivery and maintenance vehicles utilise the same access arrangements as goods vehicles, as described above.

Refuse and Recycling

7.72 The Operational Waste Management Strategy, included within this planning application, details that waste streams generated by the operation of the Site relate to offices, staff and visiting driver facilities, and to inspection activities, and include both hazardous and non-hazardous waste.

7.73 For that waste associated with the offices and staff / visitor facilities, internal bins are emptied by cleaning staff and placed in external compounds around the Site, separated for general waste, dry mixed recyclables, glass waste and paper towels. Waste is then collected by a private contractor, with refuse collection vehicles entering the Site from the A2070, and travelling through the Site to access the various compounds in their respective locations.

7.74 Where inspection activities identify loads requiring retention and disposal, these are segregated and appropriately stored, pending their transportation for off-Site destruction, incineration, treatment or other means of disposal. Bins within each inspection shed are transferred by staff to a centralised waste compound, and then waste is collected by a private contractor.

7.75 There is no on-Site treatment and processing of any type of waste at the Site.

Sustainability and Environment

7.76 Through retention and ongoing use of the existing as-built facilities, the scheme would support the embodied carbon agenda, and continue to make efficient use of brownfield land.

Energy, Water and Sustainability

7.77 As detailed in the Sustainability Statement, included as part of this planning application, sustainability priority themes for the development relate to design and amenity, energy, sustainable drainage and flood risk, sustainable transport, nature conservation and biodiversity, waste, and pollution and nuisance.

7.78 The development layout prioritises efficient land use, strategic building orientation, integrated green infrastructure and SuDs ponds, all serving to promote operational efficiencies, passive design, biodiversity and natural surface water management. The one-way traffic system for HGVs minimises congestion and emissions, and on-Site cycle parking, EV chargers, the connecting shuttle bus service and Staff Travel Plan all serve to encourage sustainable travel for employees. Waste management practices emphasise recycling and energy recovery.

7.79 Material selection prioritises sustainability by incorporating a mix of primary, secondary and recycled aggregates and minerals, alongside responsibly sourced manufactured construction products. Buildings, cabins, fencing (including acoustic and security fencing),

and lighting have been designed to minimise environmental impact whilst ensuring durability and functionality.

- 7.80 A key sustainability feature is the use of modular-style buildings, constructed with a carefully selected combination of materials that enhance energy efficiency and durability. Modular construction reduces material waste, and also allows for flexibility, enabling the relocation or repurposing of structures in the future, therefore extending their lifecycle and reducing the need for new materials.
- 7.81 Further, the Energy Statement, included as part of this planning application, sets out how the Site has been designed to achieve high energy efficiency through a combination of passive design measures and advanced building systems. The strategy prioritises reducing energy demand by enhancing fabric performance, optimising Heating, Ventilation, and Air Conditioning ('HVAC') solutions, and integrating energy-efficient lighting and heating systems.
- 7.82 Implementation of highly efficient U-values (a measure of the effectiveness of a material as an insulator) for all building elements and optimisation of the building envelope, ensure improved thermal efficiency, enhanced occupant comfort, and reduced energy demand. Mechanical Ventilation with Heat Recovery ('MVHR') systems minimise ventilation-related energy losses while maintaining high indoor air quality, and the HVAC strategy includes a Variable Refrigerant Flow ('VRF') system to provide efficient heating and cooling. Some sections of the Site are equipped with Air Handling Units ('AHUs') with heat recovery to further improve efficiency. Heating across the site is entirely electric, with Air Source Heat Pumps ('ASHPs') providing space heating and hot water where applicable.
- 7.83 All lighting consists of high-performance LED systems, designed to maximise efficacy while reducing overall consumption, and occupancy sensors and Passive Infrared detectors have been installed in office and circulation areas to minimise unnecessary energy use.
- 7.84 Domestic hot water for office buildings is provided by fully electric under-sink water heaters, and in larger operational areas, unvented hot water cylinders with electric heating have been implemented to meet demand effectively.
- 7.85 As detailed in the Energy Statement, the development adheres to Building Regulations Part L (2013), which was the applicable standard at the time of construction, and which aims

to limit carbon emissions by ensuring that the Building Emission Rate does not exceed the Target Emission Rate as calculated using the National Calculation Methodology.

Flooding and Drainage

- 7.86 Pursuant to the EA Flood Map for Planning, the Site is within Flood Zone 1, indicating a low probability of flooding from rivers and the sea. Notwithstanding, given the Site area exceeds 1 ha, and as required by Local Plan Policy ENV6, a Flood Risk Assessment has been prepared and submitted as part of this planning application, providing an assessment of the potential effects of tidal, fluvial, pluvial (surface water), sewers, groundwater and artificial sources of flooding upon the development.
- 7.87 According to ABC's Strategic Flood Risk Assessment (2014) ('SFRA'), the Site is not at risk of flooding in the defended 1% Annual Exceedance Probability ('AEP') plus 45% climate change event and, therefore, the fluvial flood risk for the Site is low.
- 7.88 The Site is not affected by tidal flood risk given the distance to the nearest tidal waterbody, therefore flood risk is negligible and mitigation for fluvial flooding is not considered to be required.
- 7.89 Similarly, according to the EA's mapping, the Site is predominantly located in an area of no surface water flood risk, with only a very small area in the south-west being a low risk of surface water flooding (between 0.1% and 1% AEP). Therefore, mitigation for pluvial flooding is not considered to be required.
- 7.90 With respect to sewer flood risk, the historical flooding maps do not indicate that there has been any sewer flooding in the vicinity and, since there are no major changes to the development at the Site, it is expected there will be no changes to the associated flood risk.
- 7.91 Considering groundwater, the Site is not located in a groundwater source protection area or within a surface water and groundwater nitrate vulnerable zone. Historical flooding maps do not indicate that there has been any groundwater flooding in the vicinity and, therefore, mitigation for groundwater flooding is not considered to be required.
- 7.92 Further, as the Site is outside the reservoir flood extent, the flood risk from reservoir is considered to be low.

7.93 Accordingly, the Flood Risk Assessment concludes that the development can appropriately and safely manage the risk of flooding to the Site while also ensuring there is no increase in flood risk elsewhere as a result of the development. The proposals, therefore, meet the requirements of Local Plan Policy ENV6.

7.94 With respect to drainage, the Flood Risk Assessment outlines that no assessment of drainage has been undertaken since there are no changes proposed to the existing drainage system.

Ecology and Trees

7.95 Habitats present within the Site are typical of an urban environment, with landscaped areas and seven ponds. Embedded mitigation has been incorporated into the design as part of the existing LEMP, and additional mitigation has been proposed through the submitted LMMP.

7.96 There would be no significant adverse ecological impacts resulting from the continued operation of the development. Rather, the biodiversity enhancements, management and monitoring commitments proposed within the LMMP would result in positive impacts for bats, great crested newts, breeding birds, reptiles and water voles.

7.97 Similarly, as the Site is already operational and no physical works are proposed pursuant to this planning application, no trees will be removed or impacted. This has been confirmed through an Arboricultural Impact Assessment, which has been submitted as part of this planning application.

Air Quality

7.98 As required by Local Plan Policy ENV12, an assessment of the potential impacts to air quality from the operational development has been undertaken in accordance with published guidelines and best practice.

7.99 The modelling indicates levels of nitrogen dioxide and particulates would not exceed nationally accepted limits at any of the nearby residential properties in 2026. It is concluded that the effect of the development on levels of nitrogen dioxide and particulates would be negligible.

7.100 The cumulative assessment of the potential air quality effects of the development combined with cumulative schemes shows that the potential air quality effects would remain

negligible (as per the assessment of the development in isolation). Therefore, it is considered there would be no additional cumulative effects.

7.101 Accordingly, and in accordance with Policy ENV12, the proposals will not result in National Air Quality Objectives being exceeded, and no additional mitigation measures are required to prevent this.

Contamination

7.102 A Preliminary Risk Assessment for potential ground contamination at the Site has been undertaken in support of this planning application.

7.103 No potentially significant contaminative sources have been identified in association with the Site's former use, and soils on-Site are determined as being unlikely to pose a significant risk to future Site users.

7.104 The Site is not in a groundwater source protection zone. Potentially significant contamination sources on-Site are absent, and elevated contaminants have not been recorded. The Site does not pose a significant risk to controlled water receptors.

7.105 Potentially significant gas and vapour sources have not been identified, and previous ground investigations have not recorded a significant ground gas or vapour regime, meaning that ground gas or vapour protection measures would not be required.

7.106 Accordingly, the review of the Site's environmental setting and development identifies potentially significant contaminant linkages as being absent with the overall risk rating as Low. The NPPF requirement that on completion the Site can no longer be captured under the Part IIA regime is expected to have been met.

Utilities

7.107 A Utilities Statement has been prepared in conjunction with this planning application, detailing the existing utilities serving the Site, which are summarised as follows:

- UKPN (Electricity)
- SGN (Gas)
- Fulcrum (Gas)
- OCU Group (Lumen Technologies) (Telecommunications)

- Openreach (Telecommunications)
- HSE (Various)
- South East Water (Water Mains)
- Southern Water (Sewers)

7.108 Accordingly, the Utilities Statement demonstrates that the Site is serviced by electricity, gas, telecommunications, water mains and sewer utilities.

8. Planning Obligations

8.1 The NPPF advises that planning authorities should consider the use of planning obligations where they could make an otherwise unacceptable development acceptable. They should only be used where it is not possible to address unacceptable impacts through planning conditions. Paragraph 58 states that planning obligations should only be sought where they meet all of the following tests:

- A) They are necessary to make a development acceptable in planning terms;
- B) They are directly related to a development; and
- C) They are fairly and reasonably related in scale and kind to the development.

Section 106 Obligations / Unilateral Undertaking

8.2 Section 106 of the Town and Country Planning Act 1990 (as amended) enables any person interested in land to enter into a planning obligation to mitigate for the impact of the development.

8.3 Accordingly, a Unilateral Undertaking ('UU') has been submitted as part of this application, and contains obligations to mitigate for the impact of the development, in accordance with s122 of The Community Infrastructure Levy Regulations 2010 ('CIL Regulations') and the NPPF.

8.4 The submission of a UU with the application is in accordance with PINS' Procedural Guidance for Section 293D Crown Development Applications which, in Appendix 1, sets out that where an applicant is aware of the need for a planning obligation, then a UU can be submitted, and PINS will expect this to be submitted with the planning application.

Community Infrastructure Levy

8.5 It is understood that ABC commenced drafting Community Infrastructure Levy ('CIL') proposals, however, the plans for implementing CIL in Ashford are currently on hold, until the proposals for potential changes to the system set out by the Government are formalised.

8.6 As such, at the time of writing CIL is not applicable to the scheme.

9. Summary of Scheme Benefits

9.1 In presenting an assessment of the overall planning policy case and in addressing the planning balance, it is necessary to consider the benefits of the proposed development. The NPPF sets out that the ‘presumption in favour of sustainable development’ underpinning both plan-making and decision-taking. The scheme is wholly in accordance with this principle.

9.2 The scheme constitutes an appropriate development on this Site and provides for positive social, economic and environmental impacts.

Economic

9.3 The IBF represents a major investment in the Borough and is also a major employment generator for Ashford, including with respect to ABC acting as the Port Health Authority. The facility supports 941 direct jobs (819 FTE), and a further 205 across an active supply chain, together estimated to generate £38.1M in GVA per annum. With 59% of staff living locally within 10 miles, it is estimated that approximately 433 staff (377 FTE) are resident within the administrative boundary of ABC, receiving approximately £13.4M in wages per annum.

Social

9.4 The IBF supports a large number of local jobs for Ashford’s residents, with 59% of staff (433 staff, equating to 377 FTE) estimated to live within the Borough.

9.5 The IBF also supports local apprenticeships to support further professional development including, currently, in the areas of leadership and operational department management.

9.6 The operators of the IBF have established links with to the community, through a range of programmes delivering local social value initiatives. A Community Good Fund supports local societal and environmental priorities, and over the 2023-2024 year, 148 volunteer hours and £1,700 were contributed to local communities and good causes.

9.7 The IBF supports SMEs within the local community, reflected in a 2023-2024 spend of around £2.38M across 37 SMEs throughout the supply chain, producing a £637,769 social value return on investment. Mentorship programmes have been established with local suppliers, seeking to help mentee organisations break through inequalities and potential barriers, and a

Training Suit has been established in order to provide training to over 55 SMEs and VCSEs in the 2023-2024 year.

- 9.8 Initiatives have also been focused within the employee community, including a 'This is Me' programme to better understand colleagues' backgrounds and focus attention on current gaps and develop strategies for employees to develop, the development of Standing Operating Procedures ('SOPs') in Nepalese to support language needs, a 'Time to Talk' initiative to promote engagement, positive mental health and wellbeing (which has produced a £5,287 social return on investment), and increased training opportunities with commitments to train 200 staff per year on carbon literacy (seeing 816 training hours and 102 training places for disadvantaged groups in the 2023-2024 year).

Environmental

- 9.9 Through the proposed landscaping scheme, together with the Applicant's commitment to delivering the LEMPs, the proposals will contribute to significant on-Site and off-Site (at Sevington East) habitat enhancement and biodiversity net gain.
- 9.10 Although the proposals are technically subject to the de-minimis exemption, the Applicant has undertaken a voluntary retrospective assessment of BNG against the statutory metric, for both on-Site and off-Site (land at Sevington East) BNG, to be created via full implementation of the LEMPs and secured for a 30-year habitat management and maintenance period.

10. Conclusion

- 10.1 This Planning Statement has been prepared by JLL on behalf of DfT, Defra and HMRC (collectively 'the Applicant'), in support of a planning application for Crown Development in respect of Sevington IBF. This application is submitted pursuant to section 293D of the Town and Country Planning Act 1990 (as amended).
- 10.2 The proposals seek to secure full planning permission for the existing IBF and BCP on the Site. These facilities were originally delivered under temporary consent, provided for under Article 4(1)(a) of The Town and Country Planning (Border Facilities and Infrastructure) (EU Exit) (England) Special Development Order 2020. This legislation allowed for the rapid deployment of critical border control measures following the UK's exit from the EU. The temporary consent is due to expire on 31st December 2025.
- 10.3 Notwithstanding the temporary nature of the original planning permission granted through the SDO, there remains a critical requirement for the continuing operation of the IBF and BCP. Securing the continuation of the existing operations on the Site is of high strategic national importance and would serve the critical purpose of border security in the national interest. The Site remains strategically vital to facilitate border security checks, including documentary and physical checks taking place on goods entering and exiting the UK, alongside SPS checks at the BCP, to provide protection in respect to the UK's biosecurity and public health.
- 10.4 In addition to the crucial requirement for the continuation of operations at Sevington IBF in the national interest, there are significant socio-economic and environmental benefits associated with the current operation that will be retained if planning permission were secured for the IBF's longer term operation. Specific environmental benefits include the voluntary securing of BNG across the IBF Site and neighbouring land at 'Sevington East', which is also owned by the Applicant. A detailed Economic Benefits Statement has been prepared in support of this full planning application, which serves to distil the wider socio-economic benefits of the development.
- 10.5 This planning application has been prepared in the context of meaningful and proactive engagement with MHCLG, ABC and KCC, and an extensive consultation exercise has been undertaken with other statutory and non-statutory consultees and stakeholders.

10.6 The Applicant has voluntarily entered into an EIA in order to robustly assess whether the development is likely to have significant effects on the environment, and an ES with technical appendices supports this planning application.

We can support you with expert advice that reflects your business needs and priorities

James Shepperd

Senior Director



Rachel Streeter

Senior Planning Consultant



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