

Statement of Common Ground in relation to Sevington Inland Border Facility – CROWN/2025/0000002

Applicants and National Highways (NH)

1 Introduction

- 1.1 This statement sets out the areas the **Applicants** and **National Highways (NH)** agree on (four) and the areas they do not agree on (none) in relation to the application for permanent planning permission for the Sevington Inland Border Facility (CROWN/2025/0000002), so far as it affects National Highways interests. On this basis, the parties agree that it is not necessary for National Highways to submit a separate Statement of Case to the Inquiry.
- 1.2 Proactive and positive discussions and meetings between the applicant and National Highways have been undertaken post-submission of the planning application. The engagement has included, where relevant, Kent County Council regarding matters of mutual interest. However, this SoCG relates solely to matters relevant to the Strategic Road Network, comprising the M20, M20 J10a and A2070. The current level of agreement is set out in this statement.

2 Matters Agreed

Reference	Topic	Shared Position
National Highways letter to Crown Development Case team, dated 12 th September 2025	Strategic Road Network Signage	<p>The parties agree that this matter can be dealt with by way of a planning condition. Draft condition wording as proposed to ABC:</p> <p>Within 3-months of the date of this decision an updated Signage Strategy shall be submitted for the written approval of the Local Planning Authority</p> <p>The Signage Strategy shall include evidence of engagement and agreement with National Highways and Kent County Council and relevant satellite-navigation companies and a timetable for implementation. The development shall be implemented in full accordance with the details so approved.</p>

<p>National Highways letter to Crown Development Case team, dated 12th September 2025</p>	<p>Works to the Strategic Road Network: A2070</p>	<p>The parties agree that the Applicant is not directly involved in the works to the relevant area of the A2070. The parties further agree that wholly new or completely different works are not needed to mitigate the proposed development.</p> <p>Accordingly, National Highways and the Applicant agree that a scheme of works relating to the relevant area of the A2070 can be dealt with outside of this planning application for Sevington IBF via Memorandum of Understanding (MoU), or other agreement.</p>
<p>National Highways letter to Crown Development Case team, dated 12th September 2025</p>	<p>Operational Management Plan</p>	<p>The parties agree that it would be inappropriate for full details of an Operational Management Plan to be published given the sensitivities and national importance of the Site operations.</p> <p>National Highways and the Applicant therefore agree that an Operational Management Plan, can be secured outside of this planning application for Sevington IBF via Memorandum of Understanding (MoU), or other agreement.</p>
<p>New Matter</p>	<p>M20J10a A20 arms mitigation scheme</p>	<p>The parties agree that discussions are underway to finalise the mitigation to the A20 arms of M20J10a as being prepared in the SoCG between KCC and the Applicant.</p>

3 **Matters Not Agreed**

Reference	Topic	Applicant's position	National Highways Position	Relevant Application Documents
	None			

The Department for Transport
The Department for Environment, Food and Rural Affairs
His Majesty's Revenue & Customs
National Highways

24th November 2025

Signed on Behalf of the Applicant	
Signature	
Name	James Sheppard
Position	Director - JLL
Date	24 November 2025

Signed on Behalf of National Highways	
Signature	
Name	Kevin Bown
Position	Spatial Planner
Date	24 November 2025