



Historic England

Crown Development Casework Team
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12 September 2025

Dear Crown Development Casework Team

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**SEVINGTON INLAND BORDER FACILITY, MERSHAM, ASHFORD, TN25 6GE
Application No. OTH/2025/1437**

Thank you for your consultation regarding the above application for planning consent. On the basis of this information, we offer the following advice to assist the determination of this application.

Summary

The Inland Border Facility (IBF) at Sevington, Ashford, causes a high level of harm to the significance of the grade I listed Church of St Mary by greatly compromising the church's remaining rural setting.

In our view the harmful impacts of the IBF could be reduced by deepening the areas of planting shown on drawing Landscape Masterplan Sheet 1 and by considering options to soften the planting in the viewing corridor (e.g. with a wildflower meadow in keeping with its historic rural character).

We also recommend that steps are taken to ensure that a capital contribution for the Church of St Mary, proposed as mitigation for development on the site of the IBF, can be secured and delivered.



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Historic England Advice

This advice focusses on impacts to the grade I listed Church of St Mary, Sevington. The Local Authority Conservation Officer or Archaeological Advisor would be best placed to advise you on wider historic environment impacts.

Significance

The site is within the setting of several designated heritage assets, the closest of which being the Church of St Mary and a small collection of grade II listed buildings on Church Road. This cluster of historic buildings is the historic rural hamlet of Sevington, which mainly consisted of small farmsteads and agricultural workers' cottages, and had a historic functional relationship to surrounding agricultural fields as the land worked by each farmstead.

The field to the east of the Church of St Mary, prior to the construction of the IBF, made an important contribution to the church's significance as its historic rural setting that helped explain the church's rural origins.

An appreciation of this setting was enhanced by expansive views of the church across the site of the IBF, in which the church and particularly its visible church spire could be appreciated, alongside other historic buildings on Church Road as a rural historic hamlet.

This understanding of the church's origins and its association with a rural hamlet, remained, prior to the construction of the IBF, despite the expansion of Ashford to its west and north with both residential development and infrastructure associated with the M20. However, the IBF resulted in development almost entirely encircling the Church of St Mary. It is both the encircling of development and the type of development, which in the case of the IBF includes large scale industrial style buildings that means that the church's once rural setting and its contribution to significance is now significantly reduced.

Measures within the IBF proposal to mitigate this visual impact, including a green buffer between the IBF and the church and a landscaped viewing corridor, which retains an important and historic visual link between the Church of St Mary and the Church of St John the Baptist in Mersham, are positive but sustain only a sense of its once expansive rural setting.

Impact

This proposal is to retain an existing Inland Border facility and Border Control Post which was consented in 2020 under a Special Development Order, a temporary form of consent.



The Inland Border Facility has greatly eroded the contribution to significance made by the remaining rural setting of the Church of St Mary despite the inclusion of landscape buffers along the site boundary and a viewing corridor.

Erosion of the church's rural setting to its east arises from the replacement of agricultural fields with hard standing, roadways, infrastructure including lighting and fencing and large-scale buildings towards the middle and south-west corner of the site. Acoustic attenuation panels are also very visible (particularly on the north-west corner of the site) and add to the sense that the church's rural setting has been greatly eroded. The overall visual impact of the development is also accentuated by a lack of soft landscaping within the development making the contrast between the development on the site and the former rural setting of the church all the more stark.

In our advice of 2020, we concluded that the harm to the Church of St Mary caused by the IBF would be towards the upper end of less than substantial in terms of the National Planning Policy Framework (NPPF). Having visited the area again recently, and for the purposes of assessing this application to retain the IBF, that remains our view.

Policy

Section 16 of the NPPF, Conserving and Enhancing the Historic Environment, sets out policies for decisions governing change in the historic environment.

Of particular importance to this application is paragraph 208, which notes that "Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."

Paragraph 212 also applies. This states that "When considering the impact of a proposed development on the significance of a designated heritage asset, 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."

And paragraph 215 applies, which requires that the harm to significance is weighed against the public (including heritage) benefits of the proposal.

Position



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Landscaping was proposed to help reduce the visual impact of the IBF in 2020. To an extent, what has survived of this planting does help soften the visual impact of the development. But, to achieve the reduction in visual impact that was considered necessary in 2020, and which we consider remains important, there is scope to increase this, while also maintaining necessary security requirements. This is evident from both views in towards the site and from an assessment of the site on recent aerial photography.

Harm to significance could be reduced (paragraph 208, NPPF) by increasing the depth of planting shown close to the Church of St Mary on drawing Landscape Masterplan Sheet 1. This would help soften the view out from the churchyard along the viewing corridor and vice versa.

We also note planting is proposed on the site's northern edge. In views from the A2070, the church's spire can be seen behind a cluster of lighting columns and security fencing. The urbanisation of the church's setting in these views would also be reduced by maximising planting opportunities on the site's north edge.

We are pleased that the viewing corridor is retained in the application, but we note that its soft landscaping does not appear to be very successful with large areas of dry grass visible on aerial photography. Consideration of mechanisms to soften this, for example by planting it as a wildflower meadow in keeping with its historic rural character, may help soften its visual appearance. A condition of any consent, requiring that the landscaping is monitored and replaced where it fails, would also be beneficial.

For the duration of the IBF's site development history, a substantial package of mitigation for the Church of St Mary's has been proposed, because of the harmful nature of development secured.

This mitigation package comprised works to build a church car park and an indexed financial contribution to support proposals for the repair and re-ordering of the church to help secure its long-term future as a place for worship, mission and the local community. This package was secured by a Section 106 Agreement, and the construction of the car park. The car park has been built, which we welcome, but we understand that the financial contribution has not been paid in full, and that the current application includes a draft unilateral undertaking to secure payment of the balance.

The capital funds for the Church of St Mary are essential mitigation to the high level of harm caused by the IBF. We therefore urge the applicant, which is offering the undertaking, to resolve any outstanding matters swiftly so that the undertaking can be finalised and completed before the application is determined.



In reaching a decision on this proposal, the high level of harm to the significance of the Church of St Mary should be weighed against the evident public benefits of this proposal (paragraph 215, NPPF).

Recommendation

We recommend that steps are taken to ensure the landscape proposals adequately reduce harm to the heritage significance of the Church of St Mary. We also recommend that steps are taken to resolve any outstanding matters related to the capital contribution for the Church of St Mary, prior to determination of this application.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas Act) of 1990 to have special regard to the desirability of preserving listed buildings and their setting or any features of special architectural and historic interest which they possess.

If there are any material changes to the proposals, or you would like further advice, please contact us.

Your Sincerely,

Alice Brockway
Team Leader, Development Advice

[Redacted signature]

Cc [Redacted], Ashford BC

