

Crown Development Case
Planning Inspectorate

Our ref: KT/2025/132786/01-L01
Your ref: CROWN/2025/0000002

Date: 2 September 2025

Sent via email

Dear Planning Team

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.

Sevington Inland Border Facility, Ashford, Kent

Thank you for consulting us on the above application which we received on 6 August 2025. We have reviewed the document submitted.

Environment Agency position

Having reviewed the documents submitted with this application, and those previously submitted for the Special Development Order, we have **no objection** to this application.

We have made some recommendations below, needed for clarification purposes.

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the application, please reconsult us.

Should you have any queries regarding this response, please contact me.

Yours faithfully

Ms Jennifer Wilson
Planning Specialist

Direct e-mail [REDACTED]

Section 1: Technical comments

OWMS: Further information required #1

The Operational Waste Management Strategy (OWMS) document references (and is a summary of) the following documents:

- *Inland Border Facility – Waste Management Plan – Sevington* dated 2024 (current practices for managing waste from offices and staff facilities)
- *DEFRA BCP – Waste Management Plan – Sevington* dated 2024 (current practices for managing waste from the inspection activities)

It is not clear from the OWMS whether the requirements of the *Simpler Recycling in England* legislation are being met.

From 31st March 2025, all workplaces in England (with more than 10 employees) must separate their waste before it's collected, including any waste produced by employees, customers and visitors. Businesses must always separate:

- dry recyclable materials (plastic, metal, glass, paper and card)
- food waste
- non-recyclable waste (also called residual waste)

The applicant is required to have separate bins for each type of waste or separate the waste before collection. If they provide bins for your customers or visitors, they need to separate this before collection too.

Further guidance is available on our website via the following link:

<https://www.gov.uk/guidance/simpler-recycling-workplace-recycling-in-england#legal-requirement-for-workplaces>

In particular, there do not appear to be any external bins provided for food waste arising from offices and staff facilities.

Recommendations

- Provide copies of the two *Waste Management Plan* documents referenced above.
- Provide additional information regarding the arrangements for the separate collection of food waste.
- Confirm whether internal food waste bins are provided for staff? If so, how and where is food waste bulked up and collected?

OWMS: Further information required #2

The OWMS acknowledges that “*The Waste Regulations 2011 require waste producers or those handling waste to comply with the waste hierarchy (prevention, prepare for reuse, recycling, recovery, disposal)...*”

The OWMS document also states that waste streams arising from “*office activities, staff and visiting driver facilities*” (including paper, cans, plastics, glass, food waste sanitary / hygiene wastes, residual waste, used spill kits and batteries) are “*subject to contractual targets of less than 5% waste to landfill and at least 70% of waste to be recycled. The remaining waste is sent for energy recovery.*”

However, bin provision / waste storage capacity appears to be skewed towards the generation of residual waste:

- Dry mixed recyclables: 10 x 1,100 litre bins
- General waste: 17 x 1,100 litre bins
- Paper towels: 5 x 1,100 litre bins

Recommendations

- Ensure that waste storage arrangements help facilitate compliance with the waste hierarchy.
- Provide additional information regarding the waste volumes / tonnages of each waste stream which have actually been generated by the office activities, staff and visiting driver facilities since the facility became operational.