

Our ref: NH/25/12357

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Tel: 0300 470 1046
12 September 2025

Dear Sir/ Madam

Type of application Planning permission

Local Planning Authority Ashford LPA

Application Reference PINS CROWN/2025/0000002 **Ashford BC** OTH/2025/1437

Applicant name Department for Transport DfT, Department for Environment Food and Rural Affairs Defra and His Majesty's Revenues and Customs HMRC

Site Address Sevington Inland Border Facility, Mersham, Ashford, TN25 6GE

Description of the proposed development 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.

Summary of Representation

Referring to the consultation on a planning application dated 28 July 2025 referenced above, in the vicinity of the M20 at Ashford that forms part of the Strategic Road Network (SRN), notice is hereby given that National Highways' formal recommendation is that we:

recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);

We have No Objection to the principle of the development, recognising the history of the site and its on-going national importance. However, there are a small number of matters requiring further submissions in order for the application to demonstrate compliance with national policy from the SRN perspective. We are content that these matters can be dealt with via conditions

We would welcome early engagement with the applicant and their agents on the matters. If matters are progressed prior to the application decision, the proposed conditions can be amended to reflect progress at that point in time.

Background

National Highways is the government owned company which operates, maintains and improves the SRN as the strategic highway company appointed under the provisions of the Infrastructure Act 2015 and in accordance with the [Licence](#) issued by the Secretary of State for Transport.

National Highways is a statutory consultee to the planning process. It has a specific obligation to deliver economic growth through the provision of a safe and reliable SRN in line with the provisions set out in [DfT Circular 01/2022: The strategic road network and the delivery of sustainable development](#).

Reasons

We have reviewed the application and the submitted supporting documents from the SRN perspective. The SRN in the vicinity of the site comprises the M20 and A2070. The site lies close to M20J10 and J10a. The site accesses are from, and the site abuts, the A2070.

We will be concerned with proposals that have the potential to impact on the safe, reliable and/or efficient operation of the SRN (the tests set out in DfT C1/22 and MHCLG NPPF2024), due to

- a) The traffic attracted to, generated by or rerouted as a result of proposals and/or
- b) the construction, operation or maintenance of a site adjacent to the SRN.

With regards (a) we note that the site was

- i) allocated for employment development in the Ashford Core Strategy
- ii) granted consent for 157,000sqm of employment under 14/00906/AS on 13/9/2017
- iii) granted a Certificate of Lawfulness of Existing Use or Development (ref: 19/01099/AS) on 15/8/2019, confirming that development had commenced in relation to 14/00906/AS
- iv) consented as an IBF via a Special Development Order that expires on 31/12/2025.

The use of the site for the purposes now proposed under the current application is, therefore, well established. Hence, we have no objection to the principle of the development.

However, while National Highways worked at pace to facilitate the original construction and operation of the IBF, several matters remain to be formally and finally addressed. Those relating to (a) include

- 1) Site Accesses. The final design needs to be agreed and implemented
- 2) Network Signage. The final signage strategy and design of roadside signage connected to the operation of the IBF need to be agreed and implemented.
- 3) Operational Management Plan. The OMP needs to be updated to reflect experience to-date and any matters arising from (1) to (3)

It will also be noted that the access and other SRN related works will need to be the subject of separate agreement(s) under the 1980 Highways Act.

With regards (b), we note that the site

- 1) was constructed such that the main and emergency access were created through land forming part of the otherwise now completed A2070 (then Highways England) Major Project. Kent County Council acted on behalf of the SDO Government Departments to

construct the accesses. Landscaping and related matters relating to this land remain outstanding. We will engage with the applicant's agents on this matter.

Further details regarding the matters raised above can be found in Appendix A

Highway Mitigation (including works)

We note the Unilateral Undertaking includes a reference to

"Junction 10A Works Contribution: means the sum of four million nine hundred and seventy-three thousand and twelve pounds and eighty-three pence (£4,973,012.83) payable in accordance with paragraph 1 of Schedule 1 of this Agreement as a proportionate contribution towards the 'developer funding' of Junction 10A of the M20 in accordance with Policy TRA1 of the Ashford Local Plan 2030."

For the avoidance of doubt, this relates to an Ashford Local Plan policy and daughter SPG6 requirement, that relate to the original provision of M20J10a. It does not relate to any new works required to the SRN; in particular, with regards the A2070 site accesses. National Highways have no comment on the requirement or the UU offer.

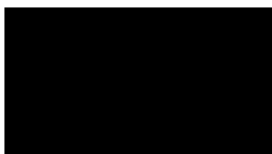
Next Steps

National Highways is committed to working closely with all parties to facilitate this development commensurate with our obligations with regards the safety, reliability and operational efficiency of the SRN.

We will work with the applicant seeking to address all outstanding matters. Subject to progress, we recognise we may need to participate in the Written Representations, Hearing or Inquiry stage of the application.

If any party has any queries with regards our representations, please contact us via PlanningSE@nationalhighways.co.uk

Yours sincerely



Kevin Bown
Spatial Planner



Appendix A National Highways recommended Planning Conditions & reasons

Having assessed the application and other material considerations, National Highways is content that the proposed development will not have an unacceptable impact on the safety, reliability and/ or operational efficiency of the Strategic Road Network (the tests set out on DfT C1/22 and/or MHCLG NPPF2024) subject to the imposition of the following recommended conditions

A2070

As noted above, while National Highways and Kent County Council engaged and worked at pace to facilitate delivery the IBF in the national interest, it remains necessary to formalise all works and related matters. The following condition is recommended to facilitate this.

Condition: Works to the Strategic Road Network: A2070

Within three months of the date of this consent a scheme of works relating to that area of the A2070 temporarily handed over from National Highways to Kent County Council to facilitate the construction and operation of the Sevington Inland Border Facility shall be submitted to and then approved in writing by the determining authority (who shall consult National Highways). Thereafter the scheme of works shall be implemented in accordance with the approved details.

Reason: To ensure that the A2070 Trunk Road continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety and paragraph 115 of the National Planning Policy Framework (2024).

Informative: This development involves work to the public highway (strategic road network) that can only be undertaken within the scope of a legal Agreement between the applicant and National Highways (as the strategic highway company appointed by the Secretary of State for Transport). Planning permission in itself does not permit these works.

In this particular case the scheme of work will need to cover all details relating to the works carried out to date or needing to be carried out in the future within the approximate area shown in drawings HE514442-VIN-ZZZ-XX-FM-ZM-0002 Page 5 of 8 dated February 2018 and HE514442-VIN-ZZZ-XX-FM-ZM-0002 Page 10 of 13 dated February 2018 as shown in Appendix B.

It is the applicant responsibility to ensure that any works to the public highway (including adjacent highway land), are covered by any necessary Agreements under the Highways Act 1980 (at no cost to National Highways).

Advice on this matter can be obtained from the Spatial Planning Team, National Highways, Bridge House, Walnut Tree Close, Guildford, Surrey, GU1 4LZ. Email PlanningSE@nationalhighways.co.uk Tel 0300 123 5000.

Strategic Road Network Signage

To finalise all SRN related signage matters and in doing so demonstrate compliance with DfT C1/22 and/or MHCLG NPPF2024, the following steps are required

- 1) The existing signage submissions need to be checked with regards to whether previously agreed signage has been fully implemented.
- 2) The existing signage strategy needs to be reviewed and updated to take account of the experience of National Highways and other stakeholders in terms of the location and form of existing and additional required signage.
- 3) The final agreed signs need to be placed on the SRN.

Condition: Strategic Road Network Signage

Within three months of the date of this consent a Signage Strategy covering the strategic road network shall be submitted to and then approved in writing by the determining authority (who shall consult National Highways). Thereafter the approved Signage Strategy shall be fully implemented.

Reason: To ensure that the strategic and local road networks in the vicinity of the site continue to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety and paragraph 115 of the National Planning Policy Framework (2024)

Informative: The Signage Strategy will include a review of the existing signage supporting the existing Sevington Inland Border Facility as well as proposals for further signage in order to meet the reasonable needs of those required to visit the site and the general travelling public.

The Operational Management Plan

To finalise all SRN related Sevington IBF Operational Management matters and in doing so demonstrate compliance with DfT C1/22 and/or MHCLG NPPF2024, the following steps are required

- 1) The existing OMP needs to be checked with regards to whether previously agreed matters have been fully implemented.
- 2) The existing OMP needs to be reviewed and updated to take account of the experience of National Highways and other stakeholders in terms of its operation.
- 3) The final agreed OMP needs to be implemented.

We are content for the site to be OMP rather than necessarily Travel Plan led. We also acknowledge the special circumstances of the site and the impact this may have on the availability and implementation of active and/or sustainable transport opportunities.

Condition: Operational Management Plan

Within three months of the date of this consent an Operational Management Plan covering all consented activities that can occur at the site shall be submitted to and then approved in writing by the determining authority (who shall consult National Highways). Thereafter the development shall be operated in full compliance with the approved Operational Management Plan.

Reason: To ensure that the strategic road network in the vicinity of the site continue to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety and paragraph 115 of the National Planning Policy Framework (2024)

Informative: National Highways would expect that via the OMP or TP an on-going commitment is made regarding the existing bus shuttle between Ashford International Railway Station, Ashford Park & Ride and Sevington IBF to ensure it will “continue to operate at current levels” and that “the service timetable is aligned with shift patterns and offers a good alternative to driving for Staff working at the Site”.

A2070: Areas Temporarily Handed Over from National Highways to Kent County Council to facilitate the construction and operation of the Sevington IBF

Area to be taken over highlighted in red.



HE514442-VIN-ZZZ-XX-FM-ZM-0002	WI – Annex C - Taking Over Certificate	Rev 1	Rev Date Feb 2018	Page 10 of 13
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Area to be taken over highlighted red.



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