

5. Consideration of Alternatives

Introduction

- 5.1. Under Regulation 18(3)(d) of the EIA Regulations¹, an Environmental Statement (ES) is required to provide “... a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment ...”.
- 5.2. Schedule 4 of the EIA Regulations, which provides further specific guidance regarding the information to be included in an ES, provides the following overview of the requirements in relation to alternatives:
- “... A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects...”* (Section 2, Schedule 4).
- 5.3. Properly construed this does not require an assessment of alternatives not considered by the Applicant (even if they are feasible alternatives). Nor does it require an assessment of incremental design iterations – especially where the iteration was specifically with a view to mitigating likely significant environmental effects – since these are not “alternatives” as envisaged by the EIA Regulations and related guidance.
- 5.4. This chapter is supported by the following:
- **Figure 5.1:** Stour Park West Masterplan - Land Use and Layout [9031_PL_10_160 Parameter Plan]; and
 - **Appendix 5.1:** Comparison of the Likely Residual Effects of the Stour Park development and the Sevington IBF Development.

Development Context

Planning Context

- 5.5. The land, covered by the current Application Site, had been previously identified as a key strategic development site within the ABC Core Strategy (2008)² and Urban Sites and Infrastructure Development Plan Document (DPD) (2012)³, and was allocated as employment land for B1 light industrial, B2 and B8 uses.
- 5.6. As set out in **Chapter 1**, the Application Site previously benefitted from outline planning permission (ref. 14/00906/AS), obtained by the previous owner in relation to the land covered by the current Application Site, which permitted the following:
- ‘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 sq. m ... together with ancillary and associated development including utilities and transport infrastructure, car parking and landscaping’.*
- 5.7. Following the outline approval of the previous scheme, the Core Strategy and DPD were both superseded upon the adoption of the current Ashford Local Plan (2019)⁴. The employment development allocation was not carried forward pursuant to the new Local Plan (2019), on the basis that outline permission had been granted for employment development over the Application Site.

- 5.8. However, that previous outline permission has lapsed (September 2024), and with the exception of the Phase 1A reserved matters (ref. 19/00579/AS), comprising the estate roads, the sustainable drainage system embedded within open space and the landscaping, no further reserved matters were submitted.

Alternatives

- 5.9. Under the EIA Regulations, an ES is required to include “a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment”.
- 5.10. Schedule 4 of the EIA Regulations identifies the following types of alternatives:
- Do nothing / No development scenario;
 - Alternative sites; and
 - Alternatives uses.

Do Nothing / No Development Scenario

- 5.11. Section 3 of Schedule 4 of the EIA Regulations requires the ES to provide the following (commonly referred to as the ‘Do Nothing’ alternative and considered within this ES as part of the ‘Future Baseline’):

“... A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge...”.

Do Nothing / No Development Scenario (Reinstatement Works)

- 5.12. Under the SDO, temporary planning permission is granted until 31 December 2025, for the use of the site as an inland border facility and would require reinstating by 31 December 2026. Therefore, consideration has been given to a ‘Do Nothing / No Development’ scenario whereby the IBF ceases to operate, and the site is reinstated.
- 5.13. As a condition of the 2022 permission, granted under the SDO, a reinstatement plan would be developed and submitted by 30 June 2025.
- 5.14. According to the 2022 SDO documents⁵, the reinstatement would involve the removal of all built infrastructure, as permitted by the SDO, including all buildings, cabins, fencing (including acoustic and security fencing) and lighting. The elements that would be retained would be the development hardstanding plot areas, which would be in addition to the estate roads, the sustainable drainage system embedded within open space and the landscaping (built out as part of the Phase 1A reserved matters for Stour Park).
- 5.15. An indicative Long-term Enhancement Plan, submitted with the 2022 SDO, sets out the framework for the retained landscape planting, identifies proposals for additional environmental enhancement, and increase public accessibility by including heritage trails and information boards on heritage and biodiversity across the site.

Do Nothing / No Development (Extant Stour Park)

- 5.16. Consideration has been given to a 'Do Nothing / No Development' scenario in which the previously consented Stour Park scheme is built out, as indicated in **Figure 5.1**. Whilst this permission has since lapsed, with no prospect of being built out, it may be possible that in the future a similar scheme could be submitted.
- 5.17. As requested within the EIA Scoping Opinion, a comparison of the likely residual effects from the previously consented Stour Park scheme and IBF Development is provided within **Appendix 5.1**. This comparison demonstrates that the likely residual effects associated with both schemes are broadly comparable.

Evolution of Baseline Conditions

- 5.18. The EIA Regulations require the consideration of the likely evolution of the baseline conditions within the Application Site in the absence of the Development.
- 5.19. Detailed consideration of the 'No Development' scenario, as appropriate to each technical discipline, is provided in the technical chapters of this ES (refer to **Chapters 6 to 11** and **Volume 3**) under the heading 'Future Baseline'. In each case, this section examines the way in which the existing baseline may evolve, as a result of natural changes, in the absence of the Development, and having regard also to proposed changes within the vicinity of the Application Site as a result of other consented schemes and any other proposed interventions (refer also to **Chapter 2: EIA Methodology**).

Alternatives Sites

- 5.20. Inland border facilities were built in the UK, all under the SDO granting temporary consent. Two facilities were built in Kent: one at Waterbrook and the other at Sevington. The Waterbrook lorry park, near Ashford, was a temporary facility and became a back-up 'reactive' site once the Sevington IBF opened in 2021. The Sevington IBF currently serves the Port of Dover and Eurostar Hub (short straits portals). Owing to confidentiality, specific details regarding site selection cannot be provided. However, the Application Site is located within a strategic position, adjacent to the M20, which provides vehicles with easy access into / out of the facilities and back onto the highway network. This minimises the journey time and distances vehicles would need to travel and the amount of associated air and noise emissions.
- 5.21. Whilst other temporary inland border facility sites were provided at other locations across the UK, no alternative sites have been pursued as a permanent IBF, which would serve the South-East, given the Application Site's strategic and efficient location.

Alternative Uses

- 5.22. The Applicant has not considered any alternative uses of the Application Site or alternative layouts for the Development. The IBF, which is currently in use, albeit on a temporary basis, is intended for permanent use, and has been laid out and adapted to best suit the needs of the current operations and operators.
- 5.23. Previous iterations of the Development are not available and are subject to confidentiality.

References

- ¹ His Majesty's Stationery Office (2017) *The Town and Country Planning (Environmental Impact Assessment) Regulations 2017*. Available online: <https://www.legislation.gov.uk/uksi/2017/571/contents> [Accessed: 27 January 2025].
- ² Ashford Borough Council (2008) Core Strategy, Adopted July 2008. Available online: [cd7-14-adopted-core-strategy.pdf](#) [Accessed: 27 January 2025]
- ³ Ashford Borough Council (2012) Urban Sites and Infrastructure Development Plan Document (DPD), Adopted October 2012. Available online: <https://www.ashford.gov.uk/media/zf2llmck/urban-sites-and-infrastructure-dpd.pdf> [Accessed: 27 January 2025]
- ⁴ Ashford Borough Council (2019) Ashford Local Plan, Adopted February 2019. Available online: <https://www.ashford.gov.uk/media/jw3nbvq1/adopted-ashford-local-plan-2030.pdf> [Accessed 27 January 2025]
- ⁵ Mott MacDonald (2022) An Analysis of the Likely Environmental Effects of the Development Report (Document Ref: 419419-MMD-XX-SV-RP-YE-0002 P08) (March 2022)