SEVINGTON
INLAND BORDER FACILITY

Department for Environment, Food & Rural Affairs

HM Revenue &Customs

Department for Transport

Environmental Statement

Volume 2: Appendices (Chapter 2)

Appendix 2.1

EIA Scoping Request Report

Sevington Inland Border Facility, Ashford

Request for an Environmental Impact Assessment (EIA) Scoping Opinion

October 2024

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Issue	Date	Prepared by	Checked by	Approved by
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02	October 2024	[redacted] Consultant Various	[redacted] Principal Consultant	[redacted] Associate Director

Comments	
01	Issued for Client Team review, comment and input
02	Issued for submission to Ashford Borough Council

Disclaimer

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Contents

Figures

Tables

Appendices

Preface

This EIA Scoping Report has been prepared by Waterman Infrastructure & Environment Ltd for the purpose of consulting with the Ashford Borough Council (ABC), the local planning authority and key consultees.

In accordance with Regulation 15(2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), this Scoping Report includes within it the following information:

- A plan sufficient to identify the land;
- A brief description of the nature and purpose of the development, including its location and technical capacity; and
- An explanation of the likely significant effects of the development on the environment.

The purpose of the EIA Scoping Report is to request an EIA Scoping Opinion from ABC in accordance with Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended). The EIA Scoping Opinion will in turn allow the Applicant to be clear on what ABC consider as the main likely significant environmental effects and thus what will need to be focused on during the EIA process.

The EIA Scoping Report identifies those areas in which likely potential significant environmental impacts are anticipated and sets out the proposed method for assessing those impacts in the Environmental Impact Assessment. Likely sensitive environmental receptors are highlighted in the EIA Scoping Report, as well as the range of assessment studies envisaged. Additionally, assessment studies undertaken to date are also described where available.

1. Introduction

1.1 Background

This Environmental Impact Assessment (EIA) Scoping Opinion Request report has been prepared by Waterman Infrastructure & Environment Ltd. (hereafter 'Waterman') on behalf of the Department for Transport (DfT), His Majesty's Revenues & Customs (HMRC) and Department for Environment, Food and Rural Affairs (DEFRA) (hereafter the 'Applicant') in support of a full planning application for the retention of the existing Inland Border Facility and Border Control Post (hereafter the 'IBF') at Sevington near Ashford in Kent, TN25 6GE[1]. The site comprises approximately 48 hectares (ha), where the IBF is currently located (hereafter the 'Application Site'). The location of the Application Site is shown on **Figure 1** with the indicative planning application boundary shown in **Figure 2**.

Prior to the exit of the United Kingdom (UK) from the European Union (EU) on the 31 December 2020, the Town and Country Planning (Border Facilities and Infrastructure) (EU Exit) (England) Special Development Order 2020[2] was made by the Secretary of State in accordance with Schedule 59 of the Town and Country Planning Act 1990. The application for the Special Development Order (SDO) for the site was submitted on 20 November 2020, pursuant to Article 4(1)(a) of the overarching SDO (statutory instrument) and granted on 01 December 2020.

Subsequent permission was granted by the Ministry of Housing, Communities and Local Government (and then the Department for Levelling Up, Housing and Communities) on 23rd December 2020, 24th November 2021 and 28th April 2022, to account for evolving operational requirements) pursuant to the SDO. The temporary permission is set to expire on 31 December 2025.

The proposed planning description is as follows:

'Retention of the existing 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.'

This is referred to as 'the Development'. Further details of the Application Site planning history, conditions and land uses in the vicinity of the Application Site, together with the development, are set out in **Section 2**.

This report comprises a request for an EIA Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017[3] (herein the 'EIA Regulations 2017').

1.2 Environmental Impact Assessment

The Ministry of Housing, Communities and Local Government (and then the Department for Levelling Up, Housing and Communities) Planning Practice Guidelines[4] state that the purpose of Environmental Impact Assessment (EIA) is to:

"*protect the environment by ensuring that a local planning authority when deciding whether to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision-making process*".

[1] Inland border facilities are UK government sites where customs and document checks can take place away from port locations.
[2] Town and Country Planning (Border Facilities and Infrastructure) (EU Exit) (England) Special Development Order 2020 (2020/928). Available at: https://www.legislation.gov.uk/uksi/2020/928/contents/made
[3] HMSO (2017) The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
[4] Ministry of Housing, Communities and Local Government (2018-2021) and Department for Levelling Up, Housing and Communities (2014): Environmental Impact Assessment (Updated 13 May 2020). Available at: https://www.gov.uk/guidance/environmental-impact-assessment

The Development is not Schedule 1 development under the EIA Regulations 2017, for which EIA would be mandatory. It is however a Schedule 2 development (category 10b *urban development projects*), for which EIA is required where the Development is likely to have significant effects on the environment by virtue of factors such as its nature, size and location.

The Applicant acknowledges that due to the scale and nature of the Development, and its likely environmental impacts, the Development constitutes EIA development. It is on this basis that the Applicant intends to submit an Environmental Statement (ES), the product of the EIA process, in support of the planning application. As such, the Applicant has not sought an EIA screening opinion from ABC.

1.3 EIA Scoping

'Scoping' refers to the process of identifying those environmental aspects that may be significantly affected by the Development. It is an important, though optional, component of the EIA process which examines the potential range of likely significant environmental effects. From this, it reports the likely significant environmental effects (those to be 'scoped in'); this approach avoids unnecessary or over-complicated examination of minor or perceived issues (those to be 'scoped out').

In accordance with Regulation 15(2) of the EIA Regulations this request for a scoping opinion includes:

- A plan sufficient to identify the land (refer to **Figures 1** and **2**);
- A brief description of the nature and purpose of the Development, including its location and technical capacity; and
- An explanation of the likely significant effects of the Development on the environment.

The opportunity has also been taken to provide additional information to ABC that sets out:

- The proposed approach to the EIA;
- The consultation that will be undertaken as part of the EIA; and
- The intended structure of the ES.

1.4 Competent Experts

Regulation 18(5) of the EIA Regulations 2017 states that:

"*In order to ensure the completeness and quality of the environmental statement—*

(a) the developer must ensure that the environmental statement is prepared by competent experts; and

(b) the environmental statement must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts."

Waterman are registrants on the Institute of Environmental Management and Assessment's (IEMA) EIA Quality Mark Scheme, which provides external accreditation of our environmental statements and EIA project management processes. Further information on the EIA Quality Mark Scheme can be found here: https://www.iema.net/recognition/eia-quality-mark.

The ES will include details for the relevant experts that undertook the EIA. The consultant team that has been appointed to undertake the technical assessments, required to inform the EIA and resultant ES, are suitably qualified experts, in line with Regulation 18(5).

2. The Application Site and the Development

2.1 Planning History of the Application Site

2.1.1 Stour Park – Outline Application

In 2014, an Outline Planning Application for the Stour Park development was submitted (Ref. 14/00906/AS). Planning permission was granted in September 2017 ('the 2017 Scheme'). Stour Park is described as follows in the planning application:

'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'.

Much of the land associated with the Application Site is covered by outline planning application 14/00906/AS.

2.1.2 Stour Park - Reserved Matters Application

In July 2019, the initial reserved matters application (Ref. 19/00579/AS) was granted for the development Phase 1A of the Stour Park development for details relating to the access, internal estate roads, open space including landscaping and sustainable urban drainage.

A Certificate of Lawfulness of Existing Use or Development (Ref: 19/01099/AS) was granted in August 2019, confirming that development has commenced in relation to outline planning permission 14/00906/AS and associated Phase 1A works approved under reserved matters application reference 19/00579/AS.

2.1.3 Sevington Inland Border Facility - Special Development Order (SDO)

The application for the Special Development Order (SDO) for the site was submitted on 20th November 2020, pursuant to Article 4(1)(a) of the overarching SDO (statutory instrument) and granted on 1st December 2020

As indicated in **Section 1**, on 20th November 2020, an SDO temporary application was applied for, which was subsequently granted on 1st December 2020. The planning description for the 'Sevington – Ashford Inland Border Facility' is as follows:

"The temporary use of land for up to 5 years operating 24 hours a day 7 days a week, for an Inland Border Facility for use in different phases by Department for Transport, HM Revenue & Customs/Border Force, Department for Environment, Food and Rural Affairs, Department for Business, Energy and Industrial Strategy for border readiness, CTC, ATA and CITES checks, and market surveillance activities. The proposed development includes the laying out of up to 1,300 Heavy Goods Vehicle (HGV) parking spaces, capacity for 287 HGVs in 42 entry lanes, 357 staff car parking spaces, two temporary access points, formation of a new permanent access (main access to the M20 junction 10a link road) and an emergency access point to the north, diversions and extinguishments to PRoWs, the erection of buildings and structures for border processing purposes within the development plot area of up to 25,890m2 to a maximum height of 12m, security fencing to a maximum height of 2.1m, CCTV, noise attenuation bunds and fences to a combined maximum height of 5m, lighting columns to a maximum height of 12m, drainage and all associated engineering, site preparation works and extensive hard and soft landscape works. Approval is also sought for the temporary use of part of the site for a period of up to 12 months for storage of approximately 83,140m3of stockpile material."

The 'SDO site' comprised to two parcels of land:

- the western parcel, which comprised 48ha of agricultural land, to accommodate all operational facilities limited to land west of Highfield Lane; and

- the eastern parcel, comprising approximately 45ha to the east of Highfield Lane which was included for use during the temporary stockpiling of material necessary for the earthworks and associated bunding and landscaping.

The requirement for the SDO was due to the national importance of the timely delivery of border infrastructure in the wake of the United Kingdom (UK) exiting the European Union (EU). A transition period was required to adjust and negotiate future trading relationships. Introduced to support customs checks at ports, the requirement for inland border infrastructure would provide facilities to check goods moving under a Common Transit Convention and provide customs checks on non-transit imports and exports.

The SDO was accompanied by a series of environmental studies, including 'An Analysis of the Likely Environmental Effects of the Development Report' (November 2020) as required as per article 4(2)(h) of the Town and Country Planning (Border Facilities and Infrastructure) (EU Exit) (England) Special Development Order 2020.

The scheme required Heavy Goods Vehicle (HGV) parking and border checking facilities for Her Majesty's Government (HMG) for a temporary period, commencing on the 1 January 2021 up until 31 December 2025.

Following consent of the SDO application in December 2020 ('the 2020 Scheme'), three subsequent applications were approved, these are summarised in **Table 2.1**.

Table 1: Subsequent Temporary Planning Approvals

Date of Approval	Nature of the Application
23 December 2020	Additional approval sought for: • The temporary dual operation of the Sevington and Waterbrook IBFs from 01 January 2021 until 28 February 2021 during which the Sevington IBF shall be used to provide up to 1,042 HGV spaces only during this period; and • Approval is also sought for the temporary use of part of the site for a period of up to 12 months from 1 January 2021 for storage of approximately 83,140m3 of stockpile material, in part of the area to the east of Highfield Lane.
24 November 2021	Application made under article 4(1)(a) of the Town and Country Planning (Border Facilities and Infrastructure) (EU Exit) (England) Special Development Order 2020 to revise the consent (red text): *"The temporary use of land until 31 December 2025 operating 24 hours a day 7 days a week, for an Inland Border Facility for use in different phases by Department for Transport, HM Revenue & Customs/Border Force, Department for Environment, Food and Rural Affairs, Port Health Authority (PHA) and Animal and Plant Health Agency (APHA), Department for Business, Energy and Industrial Strategy for border readiness, Common Transit Convention (CTC), Admission Temporaire / Temporary Admission (ATA), Carnet, Sanitary and PhytoSanitary (SPS), Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), and other customs related checks, and market surveillance activities and ancillary COVID-19 testing and facilities. The proposed development includes the laying out of up to 1,300 Heavy Goods Vehicle (HGV) parking spaces, capacity for 260 HGVs in 42 entry lanes, 357 staff car parking spaces, ~~two temporary access points,~~ formation of a new permanent access (main access to the M20 junction 10a link road) and an emergency access / small vehicle ejection point to the north, access off Church Road into the staff car park, emergency access points off Highfield Lane, diversions and extinguishments to Public Rights of Way (PRoWs), the erection of buildings and structures for border processing purposes within the development plot area of up to 34,500m2 to a maximum height of 8.5m, provision of 24 (19 permanent and 5 reserved) refrigerated semi-trailers covering an area of approximately 870m2 associated with the Defra*

Date of Approval	Nature of the Application
	facility, provision of HMRC containers covering an area of approximately 90m2, security fencing and noise attenuation bunds and fences to a combined maximum height of 5m, CCTV columns to a height of 8m, lighting columns to a maximum height of 12m, drainage and all associated engineering, site preparation works and extensive hard and soft landscape works. Approval is also sought for the temporary use of part of the site ~~for a period of up to 12 months~~ for the storage of approximately 97,500m3 of stockpile material, and retention of the material until July 2022."
28 April 2022	Application made under article 4(1)(a) of the Town and Country Planning (Border Facilities and Infrastructure) (EU Exit) (England) Special Development Order 2020 to revise the November 2021 consent (red text): *"The temporary use of land until 31 December 2025 operating 24 hours a day 7 days a week, for an Inland Border Facility for use in different phases by Department for Transport, HM Revenue & Customs/Border Force, Department for Environment, Food and Rural Affairs, Port Health Authority (PHA) and Animal and Plant Health Agency (APHA), Department for Business, Energy and Industrial Strategy for border readiness, CTC, ATA, Carnet, SPS, CITES and other customs related checks, and market surveillance activities and ancillary COVID-19 testing and facilities. The proposed development includes the laying out of up to 855 ~~Heavy~~ Goods Vehicle ~~(HGV)~~ parking spaces, capacity for 260 ~~HGVs~~ goods vehicles in 42 entry lanes, 357 staff car parking spaces, formation of a new permanent access (main access to the M20 junction 10a link road) and an emergency access / small vehicle ejection point to the north, access off Church Road into the staff car park, emergency access points off Highfield Lane, diversions and extinguishments to PRoWs, the erection of buildings and structures for border processing purposes within the development plot area of up to 34,500m2 (HMRC, BCP and FM Plots) to a maximum height of 8.5m, provision of 24 (19 permanent and 5 reserved) refrigerated semi-trailers covering an area of approximately 870m2 associated with the Defra facility, water tank and pump house for sprinkler system, FM cabins, additional storage and additional Defra ancillary infrastructure, ~~provision of HMRC containers covering an area of approximately 90m2,~~ security fencing and noise attenuation bunds and fences to a combined maximum height of 5m, CCTV columns to a height of 8m, lighting columns to a maximum height of 12m, drainage, including the installation of surface mounted attenuation storage tanks and all associated engineering, site preparation works and extensive hard and soft landscape works. Approval is also sought for ~~the temporary use of part of the site for the storage of approximately 97,500m3 of stockpile material, and retention of the material until July 2022~~ additional site wide ancillary infrastructure covering a maximum development area of 500m2 (including back-up generators, marshal gate cabin and emergency exit, GRP Critical Load MCCB Chamber and GRP Busbar Chamber) and for land levelling, construction of bunds and landscaping associated with the creation of biodiversity enhancements on the land east of Highfield Lane."*

2.2 The Application Site Location

The Application Site is located in Sevington near Ashford in Kent, TN25 6GE. within a predominantly agricultural area which covers an area of approximately 48ha and is centred on grid reference 603935, 140708 (postcode: TN25 6GE). The location of the Application Site is shown in **Figure 1**, with the indicative planning application boundary shown in **Figure 2**.

The Application Site is located within Ashford Borough Council (ABC) and Kent County Council (KCC) administrative boundaries. It is bounded:

- to the north by the A2070 Link Road and the M20 motorway (M20 Junction 10a);
- to the west by the A2070 Bad Munstereifel Road, St Mary's Church and an agricultural holding (Court Lodge);
- to the south by Church Road and residential properties and the rail link for the Channel Tunnel; and

- to the east by Highfield Lane, residential properties and agricultural land.

2.3 The Current Application Site Conditions (Present Day, 2024)

The Application Site is currently in use for the temporary and operational IBF; which is bound by fencing to secure the perimeter boundary. In selected locations, landscape bunds are present to provide visual screening of the IBF and its operations. The Application Site comprises a mix of landscaped areas and bunds, featuring tree planting, drainage ponds and ditches, together with hardstanding, notably internal estate roads and areas for vehicle parking for staff and HGVs (at ground level). Buildings on site are limited to the northern central (Inland Border Facility) and south-western (Border Control Point) parts of the Application Site.

As set out in **Section 2.1.3**, the SDO site is used by several different Governmental organisations. Current operations on-site are summarised **Section 2.8 (The Development)**.

2.4 The Pre-Development Site Conditions (2019 / 2020)

For the purpose of the EIA, a pre-development baseline for the Application Site will be used, i.e. those site conditions in the absence of the IBF, with the implementation of the Phase 1A works (reserved matters), as shown in **Figures 3 and 4**. A pre-development baseline, incorporating the extant permission, will ensure that a worst-case scenario is assessed in the EIA. This approach will help to identify the maximum possible environmental damage or impact the project could cause.

The boundary of the Application Site is mostly vegetated, comprising trees and tree belts, hedgerows and shrubs, together with areas of grassland. Within the Application Site itself, there are areas of hardstanding, these are limited to the access road, internal estate / circulation roads and pathways. Areas of open space and landscaping, comprising grassland and wildflower meadow, areas of ornamental planting, are interspersed with drainage features, in the form of ponds, wetland margins and drainage ditches. There is provision for seven development plots within the Application Site, these are clear of any vegetation. Additional ecological features are present in the form of bird and bat boxes, together with reptile and invertebrate hibernaculaand logpiles.

A section of the Old Mill Stream is conveyed through the north-east part of the Application Site via ditches and culverts.

There are no designated heritage or ecological assets located within the Application Site. A high-pressure gas main runs north to south through the centre of the Application Site; this includes a 9m easement on either side of the pipeline.

There are several access points along the boundary of the Application Site, which connect to the surrounding highway network. However, the primary access is from the east, via A2070 Bad Munstereifel Road and Church Road.

- two points are located along the A2070 Link Road to the north, one of these points is the primary site access and the other is for emergency use; and
- one point and is used by staff (to access the staff carparking area).

Within the Application Site there is a public right of way; Bridleway AE672 provides a connection between A2070 Bad Munstereifel Road and the former Highfield Lane via a route which takes users along the southern boundary.

The Application Site is defined by a generally flat topography. Ground levels range between 50.0m Above Ordnance Datum (AOD) and 55.0m AOD.

2.5 Historical Site Uses

Historically, the Application Site has remained largely undeveloped agricultural land (arable farmland). Church Road and Highfield Lane are historic routes, which are partially within the Application Site.

2.6 Land Uses Surrounding the Application Site (2024)

The area surrounding the Application Site to the east is semi-rural dominated by arable farmland, with areas of residential and commercial land uses to the north and west. The existing land use and character of the area to the south and west is a mixture of commercial and light industrial.

The M20 motorway (and Junction 10a), which is located to the north of the Application Site, runs south-east to north-west. Beyond this are areas of open space, agricultural land and residential properties.

To the east, the Application Site is bound by Highfield Lane, which connects to Kingsford Street and Blind Lane (Mersham) to the north and east. Most of the properties are residential dwellings (some of which are Listed) and includes several agricultural holdings (the nearest of which is Hillcrest Farm). Bridleway AE673 connects Highfield Lane to Blind Lane.

To the south, Church Road and the Channel Tunnel Rail Link (CTRL) form the southern extent of the Application Site. There are isolated residential properties along Church Road (some of which are Listed). To the south of the railway lines is agricultural land, together with a Network Rail (works Delivery) site and the Ashford International Truck Stop. Further south are residential properties (Finberry), and isolated properties along Cheeseman's Green Lane (some of which are Listed). Footpath AE344 connects Blind Lane to Church Road on the north side of the railway lines. Restricted Byway AE350 connects Church Lane and Waterbrook Avenue, to the south, via a railway bridge (Cheeseman's Green Lane).

To the west of the Application Site the Church of St Mary, a Grade I Listed Building, and an agricultural holding (Court Lodge, a Grade II Listed Building), together with a small number of residential properties along Church Lane. Beyond the A2070 Bad Munstereifel Road is Willesborough which includes a mix of residential, commercial and light industrial uses (Ashford Retail Park, Ashford Business Park and Orbital Park). A Scheduled Monument[5] is located to the south of Ashford Business Park, on the south side of the railway. Footpaths AE34B, AE340 and AE639 connect into Bridleway AE672, on the east of the Application Site.

The closest site designated for nature conservation is Ashford Green Corridors Local Nature Reserve (LNR) 50m west of the Application Site. Hatch Park Site of Special Scientific Interest (SSSI) is 550m north-east.

Hatch Park Grade II Listed Registered Park and Garden is situated approximately 500m north-east of the Application Site.

2.7 Planning Context and the Need for Retention

The Application Site was previously allocated for employment purposes, pursuant to Ashford Core Strategy (2008) ('the Core Strategy') and the Urban Sites and Infrastructure Development Plan Document (2012) ('DPD'). Although this allocation was not carried forward into the Local Plan 2030 (2019) ('the Local Plan'), it is understood that this was on the basis of outline permission (ref: 14/00906/AS) having already been granted for employment development. Therefore, the precedent of an employment-type development and use of the Application Site had already been established, and this was considered to demonstrate the suitability of the Application site for the IBF operations and associated processing of large numbers of HGVs, with the corresponding economic benefits and employment generation as sought under the original site allocation.

[5] A moated site and associated garden earthworks 460m south east of Boys Hall.

As set out above, the IBF was originally delivered under temporary consent, provided for under Article 4(1)(a) of The Town and Country Planning (Border Facilities and Infrastructure) (EU Exit) (England) Special Development Order 2020. This legislation allowed for the rapid deployment of critical border control measures following the UK's exit from the European Union ('EU'). The temporary consent is due to expire on 31st December 2025. This critical inland border facility is, however, required for the foreseeable future. Securing the continued use of the existing operations on the Application Site is of high strategic importance and would serve the critical purpose of border security in the national interest. The Application Site is critical to continue for checks, particularly biosecurity checks, and for supporting the UK supply chain.

2.8 The Development

2.8.1 Overview

The Development comprises the current operational IBF, including:

- Goods vehicle parking for up to 855 vehicles, including 42 entry lanes with a capacity of up to 260 goods vehicles, 24 refrigerated semi-trailers and 357 staff car parking spaces;
- Border checking facilities;
- Security fencing;
- Noise attenuation bunds and fences;
- CCTV and lighting columns;
- Drainage; and
- All associated engineering and landscaping works.

The estate roads, sustainable drainage system and landscaping already benefit from planning permission, pursuant to extant planning permission (ref: 19/00579/AS).

2.8.2 On-Site Operations

The Development will continue to provide HGV parking and border checking facilities for Her Majesty's Government (HMG) and a variety of governing bodies, including DfT, HMRC including Border Force as its operational agent, Defra, including the Port Health Authority (PHA) and Animal and Plant Health Agency (APHA).

The following operations will be undertaken on-site by the respective Government bodies:

- HMRC / Border Force operations for Common Transit Convention (CTC) movements (Offices of Departure / Destination) & Admission Temporaire / Temporary Admission (ATA) Carnets and CITES checks on behalf of Defra.
- Defra checks in relation to live animals[6], animal products and food and feed of non-animal origin border control posts (BCP). BCP (operational for Eurotunnel) would be operated by the Port Health Authority. Defra would also use the site to undertake sanitary and phyto-sanitary checks at the BCP designated for consignments from Eurotunnel inbound to the UK.
- Market surveillance activities: checking compliance of imported goods for product safety compliance by market surveillance authorities (principally Local Authority Trading Standards) - discharging legal obligations and BEIS responsibilities. Market surveillance authorities would be operating on-site sharing the HMRC / Border Force premises (i.e. office buildings, inspection sheds, staff car park, HGV parking spaces).

[6] In line with Eurotunnel guidance, animals accepted on passenger shuttles include dogs, cats and ferrets (pets or for commercial purposes); rodents, rabbits, birds, invertebrates, amphibians, and reptiles; and domestic equidae (horses, ponies, donkeys and mules).

2.8.3 Building Extent and Heights

The buildings and structures for border processing purposes do not exceed 12m in height. Security fencing is installed to a maximum height of 2.1m, noise attenuation bunds and fences to a maximum height of 5m and lighting columns to a maximum height of 12m.

There are three zones within the Application Site (see **Figure 5**), which includes the Border Control Point (BCP), HMRC and Facilities Management (FM) areas. The parameters for of each of these zones is set out in **Table 2.2**.

Table 2: Sevington IBF Zones

Zone	Zone Area (sqm)	Maximum building footprint (sqm)	Maximum building height (m)
BCP	23,156	9,253	8.4
HMRC	10,762	5,103	9.032
FM	633	267	3.0

2.8.4 Lighting and Security

Lighting columns within the Application Site are up to 12m in height, in the lorry parking areas and in the entry lanes, and up to 8m in height near the staff parking areas.

CCTV is installed on-site at the entry lanes area and the staff parking area, at 8m high for all CCTV cameras not facing the entry lanes.

2.8.5 Vehicular Access

Vehicular access, for staff vehicles only, is from A2070 Bad Munstereifel Road and Church Road in the south-west of the Application Site. Two vehicle access points are provided into the Application Site from the Link Road to the north - a primary (main) access for all vehicles visiting the facility, and a secondary access for emergency use.

2.8.0 Operational Hours

The Development would continue to operate 24-hours, seven days a week.

3. Consultation

Consultation with relevant statutory and non-statutory bodies assists in ensuring that all relevant environmental issues are identified. This enables the EIA to operate as part of an iterative process whereby environmental issues are identified and considered as part of the design. In this way, the design can be refined through the incorporation of mitigation measures serving to avoid or reduce adverse effects and enhancing its beneficial effects.

Consultation has already begun and will continue to be undertaken as part of the design and EIA process. Where relevant this scoping report will make reference to consultation undertaken to date. The Applicant and their consultant team are proposing to consult with a variety of organisations, including but not limited to the below:

- Ashford Borough Council (ABC)
- Kent County Council (KCC);
- Environment Agency;
- Natural England;
- Historic England;
- National Highways; and
- Other utilities providers.

Each technical chapter of the ES will (as appropriate) include a summary of consultations undertaken as part of the EIA.

The Applicant will organise public consultation events and will continue to engage with and update the local community on the application scheme both prior to submission and during its determination. The planning application will be accompanied by a **Statement of Community Involvement**, setting out the approach taken.

The Applicant has set up a dedicated website to keep members of the public informed of the proposals: www.engageSevingtonIBF.co.uk

4. What the EIA Will Consider

4.1 Introduction

This section sets out what the EIA will consider and comprises the following:

- **Section 4.2** outlines how the baseline and future baseline scenarios are to be considered.
- **Section 4.3** outlines the information to be included to describe the Development, to enable the likely significant effects to be appropriately assessed.
- **Section 4.4** outlines how alternatives are to be considered.

4.2 EIA Strategy

An EIA Strategy was prepared by the Applicant (see **Appendix 1**), which was issued to ABC and KCC for discussion at pre-application meetings held on 4th (KCC) and 5th September (ABC) 2024. It was at the Applicant's request, that the EIA Strategy was reviewed by Temple Group, on behalf of ABC. A meeting, between the Applicant, ABC and Temple, was held on 27th September 2024 to discuss the strategy and the following points were raised:

- to demonstrate that the construction phase of the IBF was assessed, the construction assessments from the November 2020 SDO should be provided;
- given the impacts to soils and agriculture result from construction, text to scope out soils and agriculture should be included; and
- a comparison of the impacts between the previous Stour Park outline scheme (Ref. 14/00906/AS) and the Development should be provided.

We have sought to address these comments in this EIA Scoping Report and upcoming ES.

4.3 Baseline Scenarios

To enable the assessment of the effects of the Development, it is necessary to establish the environmental conditions that will exist at the Application Site at the time the Development is implemented. These conditions are referred to as the 'baseline conditions'. For many sites, baseline conditions can be identified easily as the conditions are unlikely to change materially between the time surveys or monitoring are undertaken and the time the development is anticipated to be implemented. However, with the IBF having been constructed and is currently in operation (with current planning permission due to expire in December 2025), a current day (2024) baseline would not be appropriate.

The EIA baseline will assume a 'pre-development' baseline for the Application Site (2019/2020) utilising pre-development surveys and studies, prepared by Mott MacDonald, in relation to the SDO application. Therefore, the baseline for the Application Site, which is considered to be a reasonable worst-case approach, will comprise of the following:

- Extant planning permission (Phase 1A) – this comprises the estate roads, the Sustainable Urban Drainage systems (SUDS) (embedded within open space) and the landscaping and layout of that open space (including measures specifically designed for ecological/biodiversity enhancement purposes within that open space) pursuant to the extant planning permission referenced above (reference 19/00579/AS) which were already in place prior to the IBF; and
- Environmental conditions presented in the SDO reports (2020).

The exception to this would be with regard to ecology, where it has been concluded that it would not be appropriate to use the 2020 baseline alone as this would undervalue those habitats that have been retained and enhanced over and above their historic status. Further details are provided in **Section 6.6**.

4.4 The Development

Demolition and Construction

Given that the IBF is already built, the effects from construction have already occurred. The construction phase effects were considered and assessed as part of the SDO application (see **Appendix 2**). No additional construction effects are anticipated as a result of the Development, as such, it is proposed that the assessment of the demolition and construction phase is scoped out of the ES.

Operational Phase

The IBF is permitted to operate only until 31 December 2025, when the current permission expires. As such, the impacts from the Development will relate to the period from 1 January 2026 onwards.

As required by the EIA Regulations 2017, the description of the Development contained in the ES will be sufficient to enable the potential environmental effects of the Development to be assessed. It will include a factual description of the following:

- Building layout and siting, height and massing for individual buildings;
- The principles of building façade treatments and finishes;
- The quantum and distribution of different land uses, including the quantum of floorspace, either as a minimum and maximum (by use class).
- Details of vehicular, pedestrian and cycling accesses, as well as parking quantum and a description of any additional highways works required;
- Details of any additional proposals for soft and hard landscaping (including any enhancements);
- Details of any additional drainage strategies (both surface water and foul water); and
- Detailed building services plant with an indication of emissions.

The description of the Development, together with the plans, planning application drawings and accompanying area and accommodation schedules, will comprise the design information that will be assessed as part of the EIA process and reported in the ES.

Where applicable, the ES will also assess any 'associated development', i.e. that which is required to facilitate the continued operations of the IBF at the Application Site, but which falls outside the redline boundary. This might include highways improvements and/or utilities upgrades. The need for these works will be established via consultation with relevant consultees.

4.5 Alternatives

In accordance with the EIA Regulations, the ES will present a description of the reasonable alternatives to the Development that were considered by the Applicant. This description will include details regarding development design, locations, size and scale of reasonably considered alternatives, and an indication of the main reasons for the selection of the chosen option, including consideration of environmental effects.

The ES will include a description of the following:

- **The 'do nothing' scenario:** the consequences of no development taking place. Due to the planning context of the Application Site, this scenario is considered unlikely. The EIA Regulations stipulate that an ES must provide *"…an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed…"*. The planning permission for the IBF will expire in December 2025. The full application seeks to extend the operational life of the IBF beyond 2025. If the application should fail, the SDO site would be reinstated in accordance with the plans submitted with the SDO application.
- **Alternative sites:** a summary of other locations considered for development. Subject to confidentiality, a summary of the criteria used to identify sites will be provided; and

- **Alternative designs:** A summary of the main alternatives considered, such as alternative mixes of land-uses, alternative building layouts, alternative building scales and other design matters.

During consultation on the EIA Strategy, the Applicant was requested to provide a comparison of the impacts between the 2017 Scheme and the Development. This comparison will be provided as an appendix to the Alternatives section of the ES.

5. Defining the Significance of Environmental Effects

For each of the environmental topic areas assessed as part of the EIA process, and reported within the ES, an assessment will be made in relation to the relative significance of the likely environmental effects identified. These will be carried out with reference to definitive standards and legislation, where available. Where it is not possible to quantify effects, qualitative assessments will be carried out, based on available knowledge and professional judgement.

The significance of predicted effects will be determined with reference to assessment criteria for each environmental topic considered. These criteria apply a common EIA approach of classifying effects according to whether they are major, moderate or minor effects as well as adverse, beneficial, or insignificant.

Specific criteria for each issue would be developed, giving due regard to the following, as relevant:

- Extent and magnitude of the effect;
- Duration of the effect (short, medium or long-term);
- Permanence of the effect (temporary or permanent);
- Nature of the effect (direct or indirect, reversible or irreversible);
- Whether the effect occurs in isolation, is cumulative or interactive;
- Performance against environmental quality standards or other relevant pollution control thresholds;
- Sensitivity of the receptor; and
- Compatibility with relevant environmental policies.

In order to provide a consistent approach in reporting the outcomes of the various studies undertaken as part of the EIA, the following terminology will be used throughout the ES to describe the likely significance (or otherwise) of identified effects, unless alternative criteria are set out in the relevant guidance for a particular technical assessment, where alternative criteria would be clearly set out in the Chapter:

- **Insignificant:** No significant effect to an environmental resource or receptor;
- **Significant beneficial:** Advantageous or positive effect to an environmental resource or receptor;
- **Significant adverse:** Detrimental or negative effect to an environmental resource or receptor.

Whilst there is no recognised definition of what constitutes a ‘significant’ effect, it is good practice to identify the degree of significance or importance. It is therefore proposed that, where adverse or beneficial effects have been identified, they would be addressed as being of either:

- **Minor significance:** Slight, very short or highly localised effect;
- **Moderate significance:** Limited effect (by extent, duration or magnitude) which may be considered significant; and
- **Major significance:** Considerable effect (by extent, duration of magnitude) of more than local significance or in breach of recognised acceptability, legislation, policy of standards.

In accordance with the EIA Regulations, where significant environmental effects are identified, mitigation measures would be recommended and the significance of the residual effect (with the mitigation measures implemented) would be stated within the ES. The significance of residual effects would also be determined in line with the assessment criteria established for each environmental topic and using the terminology provided above.

In compliance with Schedule 4(7) of the EIA Regulations, each ES chapter will outline the monitoring arrangements post-mitigation to cover the operational phase, if such measures are considered appropriate.

6. Topics to be 'Scoped In' to the ES

This section sets out the scope of works for each of the technical environmental specialists that are to be 'scoped in' for detailed consideration within the main volume of the ES.

6.1 Socio Economics

6.1.1 Baseline Conditions and Key Issues

No socio-economic assessment was undertaken or submitted as part of the 2020 SDO application. However, given that the baseline in 2019 / 2020 would be pre-development of the IBF, there would have been no jobs as there was no economic activity. It is understood from the Applicant that the Development, which is already operational, supports 800 FTE jobs on-site. As the Development is already operational, and the application is for the continued operation, there are no construction-related jobs or economic impacts being assessed.

These 800 jobs have provided a 1.1% increase to the total number of jobs that existed in Ashford Borough pre-development (2019 = 73,000 jobs, *Office for National Statistics (ONS)*). Furthermore, in the context of Ashford Borough having a higher unemployment rate (5.7%) than Kent County (3.9%), the South East region (3.1%) and the national average (4.0%) (*12 months to December 2019, Annual Population Survey, ONS*) the direct jobs created by the Development provide a significant contribution to employment and the wider economy of Ashford. There is also the potential for further indirect economic effects to be realised from the Development.

Due to the potential for likely significant effects to the economy, it is considered that Socio Economics should be 'scoped into' the ES.

6.1.2 Likely Significant Effects

Given the nature of the Development, the socio-economic issues considered relevant for the potential to have a likely significant effect, and which would be considered in the assessment, include:

- Total on-site job creation;
- Net direct and indirect jobs and the employment effect to Ashford Borough (after taking account of leakage, displacement and multipliers);
- Economic output measured in Gross Value Added (GVA) associated with total job creation and separately, net employment; and
- Workforce Expenditure.

6.1.3 Likely Insignificant Effects

The Development will not create a new residential population and therefore social effects, including the impact on social infrastructure, for example, housing, education and primary healthcare, are not considered relevant. Furthermore, it is anticipated that the operational workforce would primarily be drawn from the local labour market, thereby placing no additional demand (or effect) on the local housing market or social infrastructure, or effects would be so small as to be insignificant. For this reason, operational phase effects on housing delivery, education and healthcare services are proposed to be scoped out of the assessment.

6.1.4 Approach and Methodology

Due to the employment-led nature of the Development, it is considered that the main area of effect for the Development for all of the economic receptors is Ashford Borough. Travel to work data from the 2011 and 2021 Census identifies respectively that 64% and 65% of all jobs in Ashford Borough (excluding people who work from home) are undertaken by people who also live in Ashford Borough, reflecting a high level of labour self-containment.

A desktop study will be undertaken to determine the national and local policy context and baseline conditions for Ashford Borough compared to Kent County, the South East region and England. Existing baseline conditions will focus on:

- the age profile and economic activity of the resident population;
- the local employment profile including the number of jobs and industrial/occupational profile from a resident-based and workplace-based perspective;
- Job density;
- Commuting patterns;
- GVA by sector; and
- expenditure.

The baseline will be established using a combination of data sources including nationally published statistics from the ONS, Experian and Oxford Economics.

The assessment will be made using quantitative methods. The number of direct jobs generated during the operational phase will be calculated having regard to job/floorspace densities published in the Homes and Communities Agency (HCA) Employment Density Guide, 3rd Edition (2015) and information provided by the Applicant.

Additionality factors (leakage, displacement and multipliers) will be applied to the number of direct jobs, to calculate net additional employment for residents of Ashford. Additionality will be applied following guidance from the HCA, Additionality Guide (2014) and the HM Treasury Green Book (2022).

Economic output from the jobs created by the Development will be calculated by applying average GVA per worker per annum published by Oxford Economics.

Expenditure from employees will be based on convenience good expenditure per person for Ashford Borough sourced from Experian. Based on professional judgement and in light of an equivocal evidence base, it is assumed that approximately 10% of this annual spend per person could be spent by employees in the local area (for example, buying lunch etc).

There are no published assessment guidance and technical significance criteria to assess socio-economic effects. Accordingly, the evaluation of effects will be undertaken based on professional experience and judgement, having regard to the existing baseline position and using the criteria summarised in **Table 6.1**.

Table 3: Socio Economic Significance Criteria

Significance	Criteria
Major Beneficial/Adverse	The Development would cause a large change to the existing baseline position (+2.5%) and the receptor is of significant importance to Ashford's economy.
Moderate Beneficial/Adverse	The Development would cause a moderate change to the existing baseline position (between +1% and +2.4%) and the receptor is of some importance to the Ashford economy.
Minor Beneficial/Adverse	The Development would cause a minor change to the existing baseline position (between +0.1% and +0.9%) and the receptor is of low or no importance to the Ashford economy.
Negligible	The Development would cause no discernible change to the existing baseline position (providing less than 0.1% change).

Those effects classified as moderate or major beneficial/adverse will be considered as significant and, where effects are established as significant adverse, appropriate mitigation measures will be identified to inform the assessment of residual effects.

6.2 Transport and Access

This section of the ES will assess the likely impacts of the Development on the local and strategic transport networks in the area surrounding the Application Site. The assessment will consider the impacts of the Development upon sensitive receptors, including travellers by all modes.

The assessment will make reference to the guidance set out by the Institute of Environmental Management and Assessment (IEMA)[7]. The assessment will also acknowledge and have regard, where applicable, to the Design Manual for Roads and Bridges (DMRB)[8].

The Transport and Access ES Chapter will utilise relevant information from the detailed Transport Assessment (TA) and other applicable supporting documents for the planning application for the Development.

6.2.1 Baseline Conditions and Key Issues

The Application Site is located to the south-east of Ashford in Kent, immediately south of the grade-separated M20 Junctions 10 and 10a. The Application Site is bound to the north by the A2070 which connects the two Motorway junctions with Bad Munstereifel Road to the west of the Application Site. To the east the Application Site is bounded by open agricultural land, to the south by a handful of residential properties on Church Road and Highfield Lane, and the Channel Tunnel Rail Link. To the west the Application Site is bounded by an agricultural holding and St Mary's Church, Sevington.

The suburban area of Willesborough, which lays to the south-eastern extent of the town of Ashford, is located to the north-west of the A2070 Bad Munstereifel Road, accessed via the A292 from M20 Junction 10. This area includes the Orbital Park business park, which is accessed from the A2070 via a signalised four-arm junction. The A2070 and M20 in the vicinity of the Application Site form part of the Strategic Road Network (SRN) managed by National Highways. The M20 provides wider connections for Maidstone and the M25 to the west, and Folkstone to the east.

The main operational access for the Application Site is located on the A2070 to the north via a signalised T-junction. The staff car park is accessed from the west via Church Road, which forms a priority junction with the A2070 Bad Munstereifel Road. Annual Average Daily Traffic (AADT) flows (based on 2023 DfT survey data) on the M20 are approximately 52,440 vehicles, and on the A2070 to the west of the Application Site approximately 35,018 vehicles. Weekday peak flows on the A2070 west of the Application Site are circa 3,166 two-way vehicle movements in the AM Peak hour, and 2,456 two-way vehicle movements in the PM Peak hour.

The Application Site is served by existing pedestrian and cycle infrastructure connecting to surrounding communities in Willesborough, and to the north of the M20. The closest bus stops to the Application Site are located north of M20, or at Orbital Park, in either case a circa 1.2km (15-18 minute) journey on foot. It is understood that the current Staff Travel Plan (STP) for the temporary IBF includes provision of a shuttle bus for access to Ashford town centre / Ashford International rail station to provide sustainable travel options for staff.

National transport policy is currently contained within the latest revision of the National Planning Policy Framework (NPPF) published in December 2023. The NPPF sets out the Government's planning policies for England, at the heart of which is a presumption in favour of sustainable development in plan-making and decision-taking. It is anticipated that an updated NPPF will be published by the end of the year, which will support a 'vision-led' approach to transport planning.

Local transport policy applicable to the Application Site is contained within the Kent County Council Local Transport Plan 4 (2016-2031), Freight Action Plan for Kent (2017), and Ashford Local Plan 2030.

[7] IEMA, 2023, Environmental Assessment of Traffic and Movement (the 'IEMA Guidelines')
[8] DMRB, 2020, LA 112 Population and human health – with respect to walkers, cyclists and horse-riders (WCH)

Guidance relating to engagement with National Highways is set out in Department for Transport (DfT) guidance 'Strategic road network and the delivery of sustainable development' published in December 2022 (DfT Circular 01/2022). The Circular sets out how National Highways will engage with the planning system with respect to the Strategic Road Network (SRN) and already promotes a 'vision-led' approach to sustainable economic growth whilst maintaining, managing and operating a safe and efficient strategic road network.

The TA and ES Chapter will have regard to the current policy as it relates to the Application Site. Formal pre-application discussions are ongoing with Ashford Borough Council, Kent County Council, and National Highways to determine and agree the scope of the TA in support of the Development.

6.2.2 Likely Significant Effects

In accordance with the IEMA Guidance, the Transport and Access Chapter of the ES will address the following likely effects:

- Severance;
- Driver Delay;
- Pedestrian and Cyclist Amenity;
- Fear and Intimidation;
- Accidents and Safety.

The significance of the transport and access effects, adverse or beneficial, will be determined based on their magnitude and the sensitivity of the receptor during the operational phases of the Development only. Given that the buildings and infrastructure comprising the existing temporary IBF permission is already in place, the impact of construction is scoped out.

6.2.3 Approach and Methodology

Baseline (Do Minimum) and Assessment (Do Something) Data

Given that the IBF is already in place, and it is therefore not possible to obtain pre-development traffic data, it is proposed to utilise the existing pre-development (Do Minimum) baseline previously used to support the temporary 2020 SDO and 2022 SDO applications.

The current assessment (Do Something) conditions will be established through an extensive data collection exercise including:

- An accessibility audit of the existing transport networks surrounding the Site;
- Procurement of observed Manual Classified Count (MCC) and Automatic Traffic Count (ATC) data at key junctions and highway links within the vicinity of the Site;
- A review of historic Personal Injury Accident (PIA) data for the most recent 3-year period; and
- A review of National Census 2021 Travel to Work and Car Ownership data.

Current trip generation for the IBF facility will be obtained from the observed traffic data, and an opening year assessment (without development) baseline scenario for 2026 developed.

A horizon year assessment of 2036, i.e. ten years on from the planning application submission, will be assessed for the existing and foreseeable future use of the Site.

This methodology will be agreed in principle with Ashford Borough Council, Kent County Council, and National Highways, and will be refined during pre-application discussions.

6.2.4 Scope and Methodology of Assessment

The following extent of the highway network, as discussed and agreed during pre-application discussions, will form the study network to be assessed. It is expected that this will include the following junctions and connecting highway links:

- M20 Junction 10.
- M20 Junction 10a.
- A2070 Bad Munsterfeifel Road roundabout.
- A2070 / Site Access junction..
- A2070 / Orbital Park junction
- A292 Hythe Road / M20 Northbound on-slip junction.
- A20 Hythe Road / Honeysuckle Avenue junction.
- A20 Hythe Road / The Street roundabout.

Subject to confirmation of anticipated assessment timeframes and pre-application scoping, it is expected that the following scenarios will be considered within the ES Chapter in relation to the operational phase of the Development:

- Baseline 2022.
- Opening Year Baseline 2026 without the Development.
- Opening Year Baseline 2026 with the Development.
- Horizon Year Baseline 2036 without the Development.
- Horizon Year 2036 with the Development.

Consistent with best practice, the assessment of transport related environmental effects will be undertaken based on the IEMA Guidance where, as a starting point, a 30% change in traffic flow represents a reasonable threshold for including a highway link within the assessment. When considering the impact of development traffic, it is therefore generally necessary to only consider highway links where traffic flows will increase by more than 30%.

Assessment Criteria

The magnitude of the potential impacts and residual impacts of the Development upon all transport modes will be assessed using the criteria in **Table 6.2**. These criteria have been based on the Guidelines for the Environmental Assessment of Traffic and Movement, published by the Institute of Environmental Management and Assessment ('IEMA'). Where specific criteria are not included in the IEMA guidelines professional judgement has been used to outline the approach to categorising the magnitude of impacts identified within the TA as well as the effects of the whole Development.

Table 4: Magnitude of Impact

Magnitude Criteria	Definition of impact by category		
	Traffic	**Public Transport**	**Walking & Cycling**
High beneficial	No increase in traffic on any road with >60% reduction in daily and peak hour traffic flows on one or more roads	>60% reduction in daily and peak hour passenger demand for public transport	Walking and cycling actively promoted over other modes with on and off site facilities for pedestrians and cyclists enhanced
Medium beneficial	No increase in traffic on any road with 30%- 60% reduction in daily and peak hour traffic flows on one or more roads	30%-60% reduction in daily and peak hour passenger demand for public transport	On and off site facilities for pedestrians and cyclists enhanced

Magnitude Criteria	Definition of impact by category		
	Traffic	Public Transport	Walking & Cycling
Low beneficial	No increase in traffic on any road with 10% -30% reduction in daily and peak hour traffic flows on one or more roads	10%-30% reduction in daily and peak hour passenger demand for public transport	On and off site facilities for pedestrians and cyclists enhanced
Negligible	<10% change in daily and peak hour traffic flows on all roads	<10% change in daily and peak hour passenger demand for public transport	Facilities for pedestrians and cyclists neither enhanced nor degraded
Low adverse	10%-30% increase in either daily or peak hour traffic flows on any road	10%-30% increase in either daily or peak hour passenger demand for public transport	On site facilities for pedestrians and cyclists degraded
Medium adverse	30%-60% increase in either daily or peak hour traffic flows on any road	30%-60% increase in either daily or peak hour passenger demand for public transport	On and off site facilities for pedestrians and cyclists degraded
High adverse	>60% increase in either daily or peak hour traffic flows on any road	>60% increase in either daily or peak hour passenger demand for public transport	Other modes promoted over cycling and walking with on and off site facilities for pedestrians and cyclists degraded

The combination of the sensitivity of the receptor and the magnitude of impact (in comparison to the pre-development baseline conditions), will be used to qualitatively assess the significance of the effect, as per **Table 6.3**. A level of significance will be assigned to both potential effects (pre-implementation of any mitigation not incorporated within the Development) and residual effects (following the implementation of any further mitigation to be conditioned).

Table 5: Impact Significance Criteria

Receptor Sensitivity	Magnitude of change			
	High	Medium	Low	Very Low / Negligible
High	Major	Major	Moderate	Negligible
Medium	Major	Moderate	Minor	Negligible
Low	Moderate	Minor	Negligible	Negligible
Negligible	Minor	Negligible	Negligible	Negligible

Scope for Mitigation

Likely mitigation measures to be delivered by the Development are:

Hard measures

The A2070 / Orbital Park junction upgrade (from a roundabout to a signalised crossroad junction) was completed in February 2023 and represents a material change in the network surrounding the Site between the pre-development (Do Minimum) and post-development (Do Something) assessment scenarios.

Soft measures

A sustainable travel strategy will be presented within the TA with the overarching aim of minimising the effect of new vehicular trips associated with the Development through a range of sustainable and innovative transport measures and initiatives.

The TA will set out the principals of the Operational Management Plan (OMP) for the Site, comprising a Traffic Management Plan (TMP), Site Signage Strategy (SSS), and Staff Travel Plan (STP), to support the safe and efficient operation of the Site.

The STP will detail the opportunities for sustainable and active travel, as well as contain initiatives to encourage travel by these modes. The STP will also outline the health, social and economic benefits of walking and cycling.

6.3 Air Quality

6.3.1 Baseline Conditions and Key Issues

In accordance with the UK Air Quality Strategy[9] and Part IV of the 'Environment Act[10], ABC has and will continue to review the ambient air quality within its administrative boundary. Work to date has concluded that levels of nitrogen dioxide (NO_2) are expected to meet the Air Quality Strategy Objectives. As such, ABC has not declared any AQMAs within their administrative boundary and the Application Site is not located in an AQMA. An Air Quality Strategy has been produced, setting out measures to be implemented to improve air quality in Ashford[11]. It is considered that pollutant concentrations across the borough are below the national limit.

The Development has the potential to change traffic flows in the area surrounding the Application Site, resulting in changes to traffic-related emissions and the local air quality. The Development could also have the potential to emit NOx to the air via the operation of energy plant.

6.3.2 Likely Significant Effects

The likely effects on local air quality to be addressed by the ES are as follows:

- Long-term changes in local air quality particularly in relation to NO2, PM10 and PM2.5 levels, due to emissions from vehicles associated with the operation of the Development; and
- Effects on local air quality from combustion plant emissions.

6.3.3 Likely Insignificant Effects

Given the Development has undergone construction, effects from construction dust, construction vehicles and construction plant emissions on existing sensitive receptors (residential, commercial properties, etc.) have not been considered further.

6.3.4 Approach and Methodology

The air quality assessment will be undertaken in line with current best practice, with consideration given to the Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM) 'Land Use Planning & Development control: Planning for air quality' (2017)[12] and comprise the following:

- Consultation with ABC's Environmental Health Officer regarding the modelling methodology and the various assumptions and scenarios to be modelled;
- A review of relevant air quality baseline conditions, including relevant KCC / ABC air quality data, and assessment documents and data from the KCC / ABC monitoring network;
- Identification of the locations of potentially sensitive existing receptors which could be affected by changes in air quality resulting from the operation of the Development;
- The application of the ADMS-Roads dispersion model, using data from the Transport Consultant (Waterman), to assess the likely effects of transport emissions generated by the Development on

[9] Department of the Environment, Food and Rural Affairs (DEFRA) (2007). *The Air Quality Strategy for England, Scotland, Wales & Northern Ireland.* DEFRA.
[10] Office of the Deputy Prime Minister (ODPM), 1995, *'The Environment Act' 1995.* OPA.
[11] Ashford Borough Council, Air Quality Strategy, 2019/20-2021/22
[12] Institute of Air Quality Management, 2017, 'Land Use Planning & Development Control: Planning for air quality'. January 2017 (Version 1.2)

local air quality. The model will assess the likely effects of NO2, PM10 and PM2.5 concentrations at existing sensitive receptors in proximity to the road network;

- Use of the ADMS 6 air quality dispersion model, using data from the Building Services Engineers, to assess the likely effects of emissions from any combustion plant associated with the completed and operational Development;
- The following scenarios would be considered in the assessment:
  - Baseline – 2022 data will be used as it is the latest year of available monitoring data;
  - Opening year (2026) 'without development'; and
  - Opening year (2026) 'with development';
- Comparison of the predicted pollutant concentrations with the Air Quality Strategy Objectives[13] and The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023[14].
- Determination of the effects of the Development on air quality, based on the application of the EPUK / IAQM guidance and considered against local policy, including Policy ENV12 of the Ashford Borough Council Local Plan 2019[15] and the 2019/20-2021/22 Air Quality Strategy. The overall significance of the air quality effects will then be determined following guidance and applying professional judgment;
- The cumulative air quality impact of all planned development within the surrounding area will be assessed; and
- Should significant adverse air quality effects be identified, as a result of the Development, consideration will be given to appropriate mitigation measures to safeguard sensitive receptors.

All technical data used in the air quality assessment will be appended to the ES.

6.4 Noise and Vibration

6.4.1 Baseline Conditions and Key Issues

From study of aerial imagery and Extrium noise maps, the dominant noise at the Application Site and surrounds is road traffic noise from the M20 to the north, A2070 to the north-west and west. Noise from the railway line to the south will also significantly contribute to the current noise climate at this location. In addition to this noise emissions from the IBF will also now contribute to the existing noise climate, the extent of which and impact is yet to be determined. On this basis it is not possible to undertake a baseline noise survey without the potential of contamination from the now operational IBF.

Given road traffic noise is a dominant source at the Application Site and surrounds, it is possible to calculate road traffic noise levels using forecast traffic data on the surrounding road links without inclusion of traffic movements associated with IBF. A baseline year of 2022 without contribution from IBF traffic is proposed on the basis that, traffic levels are not affected by Covid (unlike a baseline year of 2020) and Junction 10a of the M20 and associated roads have been built out and are operational unlike pre Covid 2019. This would be used to predict 2020 baseline road traffic noise levels at the Application Site and surrounds using CadnaA 3D noise modelling software. Noise contribution from the railway line would have to be reliant on current measured noise levels, which would also be included in the 2020 3D baseline noise model to prediction overall baseline noise levels.

To ensure calibration of the noise model, current measurements at two key locations at the Application Site boundary with the A2070 are proposed in addition to measurements at the Application Site boundary with the railway line. This will also provide an indication of diurnal variation from road traffic noise and rail noise.

There are a number of residential properties surrounding the Application Site that may be impacted by noise from the Development, namely, Church Road to the south-west and south, Highfield Lane to the

[13] Department of the Environment, Food and Rural Affairs (Defra), (2007). 'The Air Quality Strategy for England, Scotland, Wales & Northern Ireland'
[14] The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023
[15] Ashford Borough Council, Ashford Local Plan 2030. Adopted February 2019.

north-east, Kingsford Street to the north-east and east and Blind Lane to the east. St Mary's Church, Sevington is also located to the west of the Site.

6.4.2 Likely Significant Effects

The potential noise effects to be assessed within the EIA are summarised below:

Complete and operational Development:

- Permanent noise effects from fixed external and building services plant;
- Permanent noise effects from external operations, including HGV and vehicle movements within Application Site;
- Permanent noise effect from car park; and
- Permanent change in road traffic noise on the local road network due to vehicles associated with IBF.

6.4.3 Likely Insignificant Effects

The construction phase of the IBF is complete. On this basis, given no further construction is planned, assessment of this is scoped out of the assessment.

The operational phase of the IBF does not have significant sources of vibration. Vibration arising from HGV movements on a road is not different to that already experienced by the surrounding receptors. If the road is in good condition, vibration arising from discontinuities on the road surface should not be a problem. On this basis operational vibration is scoped out of the assessment.

6.4.4 Approach and Methodology

The proposed approach is as follows:

- Liaison with ABC to agree baseline approach, assessment methodology and sensitive receptors to be assessed.
- Notwithstanding the above, conduct unattended noise measurements at boundary locations adjacent to the A2070 (no. 2) and railway line.
- Develop a 3D CadnaA noise model of the Application Site and surrounds to predict and establish 2020 baseline conditions without IBF operations.
- Conduct short-term attended noise measurements of key noise sources at the currently operational IBF (fixed plant, HGV movements and any other key sources that need quantifying). Inherent mitigation will be noted.
- Predict IBF only noise levels at the nearest residential.
- BS4142:2014+A1:2019[16] noise assessment of IBF noise sources.
- Assess noise impact from car-park usage by calculating the change in 2020 established baseline noise level.
- Assessment of change in road traffic noise using CRTN[17] assessment methodology and significance criteria of DMRB LA111[18].
- Where required, specification of additional mitigation measures.
- Production of ES Chapter, Figures and Appendices.

[16] British Standards Institute, 2019. BS4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound. BSI.

[17] Department of Transport, 1988. Calculation of Road Traffic Noise (CRTN), HMSO, London.

[18] Highways Agency, (2020). Design Manual for Roads and Bridges (DMRB) Sustainability & Environment Appraisal LA111 – Noise and Vibration Version 2

6.5 Cultural Heritage

6.5.1 Baseline Conditions and Key Issues

A Cultural Heritage Assessment (Mott Macdonald 2020) has been prepared for the Application Site, which is provided in Section 3.3 and Appendix E within **Appendix 2**. There are no designated heritage assets, nor Conservation Areas within the Application Site. However, there is a non-designated heritage asset located within the Application Site, the Royal Observer Corps Monitoring Post. The Application Site falls within the setting of a number of heritage receptors that are located within the 1.5km study area applied within the Cultural Heritage Assessment (Mott Macdonald 2020). These are assessed in a manner proportionate to the potential impact on their cultural value and significance. The location of these assets is shown on the Heritage Asset plan within Appendix E of **Appendix 2**.

6.5.2 Likely Significant Effects

There could be significant indirect effects on the setting of designated heritage assets including Listed Buildings. The most notable example of which would be the change to the setting of the Church of St Mary c.30m north-west of the Application Site [1233902] and of Court Lodge [1276463] c. 20m to the north-west, which may have a significant effect on the setting of the assets.

The potential effects of the Development will be assessed under the following headings:

- Effect on the value of heritage receptors for the operation of the Development; and
- The potential significant effects from a change to the landscape character and views (assessed within a separate Landscape and Visual ES chapter) to alter the contribution made by the Development to the setting of heritage assets within the study area.

6.5.1 Likely Insignificant Effects

The Cultural Heritage Assessment summarises the potential and known archaeological remains and identifies potential for significant effects. The assessment concluded that non-designated heritage assets and unknown archaeology was anticipated to experience a negligible-minor adverse impact, due to a programme of archaeological investigation undertaken in 2020. The archaeological mitigation comprised strip, map and sample and trial trenching, undertaken in accordance with an agreed Written Scheme of Investigation (WSI) provided on the Stour Park Development and additional consultation. The impacts were considered not to amount to significant effects. The programme of archaeological mitigation fieldwork required in the WSI has been completed (Appendix 3).

Furthermore, any effects of the SDO application on the archaeology of within the Application Site would have occurred during the construction phase of the development. Due to the nature of the works on-site, the operation of the SDO development is not expected to result in any further impacts. Similarly, the continued operation of the Development is not anticipated to cause additional effects beyond those identified during the construction phase, as no significant groundworks are planned. Some minor landscaping may occur for mitigation purposes if deemed necessary by assessments conducted as part of the EIA. For these reasons, effects from construction will not be considered further. Consultation has been undertaken with Wendy Rogers, Senior Archaeological Officer at KCC (16 October 2024), and it was agreed that an Archaeological Statement would be undertaken as a standalone technical appendix to the Cultural Heritage ES chapter. The Archaeological Statement will set out details of the completed archaeological mitigation in relation to development impacts which occurred during the construction phase.

6.5.2 Approach and Methodology

A Heritage Statement will be appended to the ES as a technical appendix.

The scope of the Cultural Heritage ES chapter would be as follows:

- Review of designated heritage assets and non-designated heritage assets within the Application Site and a 500m study area. However, the study area is flexible and assets located beyond this area that are sensitive to the Development may be considered for further assessment such as the potential impacts on Conservation Areas and Registered Park and Gardens;
- Review of secondary sources including historic mapping and archive material;
- Impact assessment for heritage receptors, undertaken by Lanpro as part of the preparation of the Heritage Statement, which uses photographic evidence of views to and from the Development;
- Assess the significance of known heritage assets that are likely to be affected by the Development;
- Assess the likely impacts on the significance of affected heritage assets;
- Provide recommendations on further assessment or setting assessments as appropriate.

Proposed Approach to Phasing

Given that the IBF is already built, no interim or construction phase scenarios would be considered. The assessment will therefore consider the operational phase of theDevelopment.

Visual assessment

The likely significant environmental effects, to be considered within the Cultural Heritage ES chapter and technical appendix, and the associated approach in respect visual assessments, is set out below:

- The permanent changes to the character, context and quality of the local heritage assets. The Development will be assessed, with qualitative commentary from the significance criteria.
- The visual effects on heritage assets with support of photography, taken during preparation of the Heritage Statement, will also be dealt with as above.
- The effects on those elements of setting that contribute to the significance of heritage assets, will also be dealt with as above.

6.6 Ecology and Biodiversity

6.6.1 Baseline Conditions and Key Issues

An ecological assessment (Section 3.6 and Appendix H of **Appendix 2**) was prepared by Mott MacDonald to support the SDO application, and this together with a site verification survey in 2024 will form the baseline against which the Development will be assessed. This will ensure that a pre-development baseline is considered (as with all other assessments), however, to ensure that any new/existing species and habitat within the Application Site are also considered, a site verification survey will be undertaken.

The Application Site is located on the eastern outskirts of Ashford in Kent just to the south of the M20 Junction 10a. At the time of the initial SDO application (2020), the western part of the SDO site, which forms the Application Site, was dominated by arable habitat, with field boundaries comprising hedgerows (none were assessed as being 'Important' under the Natural Environment and Rural Communities Act (NERC), 2006. The Application Site, as surveyed in 2020 for the SDO, comprised predominantly hardstanding, with buildings and porter-cabins, whilst areas of natural and semi-natural habitats included amenity and poor semi-improved grassland, hedgerows, SuDS basins, mature scattered trees, scrub, and tall ruderal vegetation.

The closest sites designated for nature conservation importance are Ashford Green Corridors Local Nature Reserve (LNR) which is located approximately 50m west of the Application Site and Hatch Park Site of Special Scientific Interest (SSSI) located approximately 550m to the north-east of the Application Site. Two Local Wildlife Sites (LWS) are located 900m north of the Application Site (Willesborough Lees and Flowergarden Wood) and 1km south-west of the Application Site (South Willesborough Dyke).

The following Important Ecological Features (IEFs) were identified by the surveys which informed the SDO and surveys for the outline permission for the Stour Park (14/00906/AS) dated back to 2015:

- **Sites:** Ashford Green Corridors LNR, an additional 7 no designated sites (SAC and SSSIs).
- **Habitats:** hedgerows, plantation woodland, ditches and mature scattered trees.
- **Species:** badger, bats (foraging and commuting) breeding birds (farmland), dormouse and reptiles.

Furthermore, and of relevance to this application, the ecological assessment (2020) stated:

- Likely Significant Effects on the North Downs Woodland Special Area of Conservation (SAC) can be excluded;
- Likely Significant Effects in the case of Folkestone to Etchinghill Escarpment SAC and the Stodmarsh SAC (air quality), Special Protection Area (SPA) and Ramsar site (water quality) could not be excluded, and an Appropriate Assessment was necessary. Further to this and representation made by Natural England, it was considered that the temporary application with the proposed mitigation would not adversely affect the integrity of the named sites due to air or water quality impacts and as such an approval was made on behalf of the Secretary of State.
- There are likely to be beneficial impacts to local receptors as a result of the proposed enhancement measures embedded into the design and long-term re-instatement measures.

Based on the ecological data available (desk study and updated habitat surveys completed in 2020/2022) and field surveys dating back to 2008 (for bat surveys), 2010 (for dormouse) and 2012/2015 (for remaining ecological features), it is considered that the significant effects identified as part of the SDO submission would require verification and assessment based on the fact that the scheme had both embedded and additional mitigation and enhancement measures implemented to address these significant effects. Most of these measures have been subject to ongoing monitoring.

The outcome of the SDO ecological impact assessment, subsequent monitoring surveys and the latest findings can be summarised as follows:

- **Sites**: An Habitat Regulations Assessment (HRA) Stage 1 Screening is proposed for Folkestone to Etchinghill Escarpment SAC and Stodmarsh SAC, SPA and Ramsar site. Only Ashford Green Corridors LNR was identified as likely to result in slight adverse effects at construction and neutral during operation, so this would be re-assessed.
- **Habitats**: Ditches would result in neutral impacts during operation; Hedgerows and scattered trees would result in slight beneficial during operation.
- **Species**:
  - Breeding birds and wintering birds would result in slight adverse effects during operation.
  - Badger would result in neutral effects during operation.
  - Water vole would result in neutral effects during operation.
  - Bats would result in slight adverse effects during operation.
  - Reptiles would result in slight beneficial effects during operation as a result of a translocation scheme.
  - Terrestrial invertebrates would result in slight beneficial effects during operation as a result habitat creation within the SDO site.
  - Dormice would result in slight adverse effects during operation.

All effects were considered to be not significant for all the identified IEFs for the SDO. For this application for the IBF to be a permanent facility, it is proposed that those features subject to a planning condition/obligation or that were subject to mitigation and/or enhancement measures would be taken forward as IEFs.

Folkestone to Etchinghill Escarpment SAC and the Stodmarsh SAC (air quality), Special Protection Area (SPA) and Ramsar site (water quality), identified above would also include re-assessment under the Habitat Regulations to take account of the ongoing operational impacts. Furthermore, Ashford Green Corridors LNR would also be re-assessed for any change in significant effects as a result of the continued operation of the installation.

6.6.2 Likely Significant Effects

The likely significant effects have already been discussed under the key issues described in Section 6.6.1 and can be summarised as all features that were identified to be of Local or above importance in the SDO, in addition to all features that have been subject to mitigation and/or enhancement, as their status may have improved could potentially result in significant effects as a result of the continued operation of the IBF. All features that are currently subject to ongoing monitoring surveys could result in significant effects and will need to be reassessed.

In addition, an HRA Stage 1 screening for the sites detailed in the preceding sections will also require reassessment to ascertain the permanent effects on these sites due to changes to air and water quality.

6.6.3 Likely Insignificant Effects

Given the Development is complete and operational, effects from construction, such as loss of habitat, increased dust, increased noise levels and lighting, construction vehicles and construction plant emissions, increased lighting on existing important ecological features have not been considered further.

The insignificant effects identified as part of the SDO application will be reviewed against the original baseline adapted by the improved baseline i.e. that currently in place as part of the SDO which is subject to ongoing monitoring. It would not be appropriate to use the 2020 baseline alone as this would undervalue those habitats that have been retained and enhanced over and above their historic status. In so doing the effects could be incorrectly assessed as being insignificant.

All features that are valued at less than Local importance and those unlikely to be significantly affected by the Development would not be subject to detailed impact assessment. It is proposed that this assessment will be guided by the historic assessment work completed to date, and the elements that would have been retained as part of the existing SDO. Therefore, it is anticipated that the valued habitats present before the IBF was constructed and those that are present now along with the protected species they support would be subject to the impact assessment. It is also proposed that an HRA stage 1 screening is completed due to the permanence of the Development. All other effects likely to arise as a result of the Development are assessed to be insignificant and no assessment will be undertaken.

6.6.4 Approach and Methodology

The assessment approach will follow the principles set out by the Guidelines for Ecological Impact Assessment[19] published by the Chartered Institute of Ecology and Environmental Management (CIEEM) and can be summarised as follows:

- Identifying the presence and extent of Important Ecological Features
- Identifying and characterising impacts
- Identifying and characterising effects and significance
- Identifying measures to avoid and mitigate impacts and any significant effects on Important Ecological Features
- Assessing the significance of any residual effects after mitigation
- Identifying appropriate compensation measures to address any significant residual effects that remain

[19] Chartered Institute of Ecology and Environmental Management (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester

- Identifying opportunities for ecological enhancement

Proposed Approach to Assessment

Consideration is applied to identifying IEFs within the Zone of Influence (ZoI), as detailed below. If IEFs are identified, they would be subject to further evaluation and assessment.

The ZoI is the area(s) over which ecological features may be impacted by the biophysical changes caused by the Development. Based on the scale and nature of the continued operation of the IBF, it has been assessed that the conceivable ZoI is unlikely to be greater than 2km from the Application Site for the majority of ecological features but may extend up to 10km for Statutory Designated Sites. Therefore, these buffer zones have been used as the desk study data search area.

A pre-development baseline, incorporating the RMA Phase 1A works (access, internal estate roads, drainage and landscaping), will ensure that a worst-case scenario is assessed for this EIA. This approach also accounts for the assumption that the land occupied by the IBF under the SDO would be returned to its pre-development baseline in December 2025. As such, using a 2024 ecological baseline would not be reflective of the full extent of effects that would result from the continued operation of the IBF.

The 'Extended' Phase 1 Habitat survey (habitats were classified to JNCC) undertaken to inform the SDO covered the entire area of the Application Site and adjacent land to the east. A contemporary survey will be completed to verify the current baseline, by completing an 'Extended' UK Habs (2023) survey with a particular focus on the habitats retained and subject to monitoring for bats, birds, dormouse and reptile surveys. Furthermore, the site survey will verify whether there is evidence of any changes in IEF status, and evidence of the mitigation and enhancement measures implemented to date. These measures are summarised as follows:

- Closure of badger sett under licence.
- Implementation of a reptile (common lizard, grass snake and slow worm) mitigation strategy (including translocation to a receptor site and ecological supervision to address construction impacts). Following the translocation of four reptile species in July to October 2020, a four-year reptile monitoring exercise has been completed since the IBF was constructed. The surveys have confirmed the presence of four reptile species, with evidence of breeding populations of common lizard and slow worm.
- Implementation of bat foraging and commuting monitoring and the installation of 10 bat boxes. Monitoring results from June, August and September 2023, identified the presence of common pipistrelle, soprano pipistrelle and noctule. Pre-construction surveys identified up to five species, whereas data in 2023 shows that bat activity is dominated by common and soprano pipistrelle.
- Implementation of dormouse monitoring and the installation of six dormouse boxes. A licence was secured pre-construction as part of the vegetation clearance. Monitoring surveys have been completed twice a year for three years post construction (2021, 2022 and 2023). These surveys have not recorded the presence of dormice or their nests, with the exception of one suspected nest in
- Implementation of breeding bird (farmland birds) monitoring surveys and installation of 10 bird boxes. Monitoring results from April and June 2023, identified a total of 47 species with 23 considered notable (no Schedule 1 or rare breeding bird panel species were recorded, whereas two Schedule 1 birds (kingfisher and hobby) were identified in 2012. The 2023 findings resulted in recommendations to provide increased hedgerow and wildflower meadow habitat.

As referenced in industry guidance, IEFs that are anticipated to be affected by the Development have been identified and would be subject to assessment as part of the EIA for the ongoing operation of the IBF. This would be informed by the historic surveys completed across the Site, a desk study exercise and ground truthing field survey using the UK Hab classification system which directly translates into the Biodiversity Net Gain (BNG) Metric, which also requires an assessment of habitat condition.

In this Scoping report, designated sites, habitats and species that fall into the categories of importance of Local level or higher in **Table 6** have been identified as being ecologically important and/or legally protected/controlled and form the scope of data gathering during the data search and the site survey.

Table 6: Geographical Scale of Important Ecological Feature Categories

Geographical Level of Importance	Category
International	Statutory designated sites: Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites (including candidate SACs and proposed SACs, SPAs and Ramsar sites) within England. A viable area of a habitat type listed in Annex I of the Habitats Directive, or smaller areas of such habitat essential to maintain the viability of a larger whole. Regularly occurring populations of a species, large enough in number to be of **international importance** where: • The loss or degradation of these populations would adversely affect the conservation status or distribution of the species at this geographic scale; or • The population forms a critical part of a wider population at an international level; or • The species is at a critical phase of its life cycle at this scale.
National	Statutory designated sites: Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR). Ancient Woodland. A viable area of a Habitat of Principal Importance (HoPI) as listed on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, or smaller areas of such habitat essential to maintain the viability of a larger whole. Resident, or regularly occurring, populations of species, significant at an International, European, UK or National level where: • The loss of these populations would adversely affect the conservation status or distribution of the species at a national level; or • The population forms a critical part of a wider population at this scale; or • The species is at a critical phase of its life cycle at this scale.
Regional/County	Local Nature Reserves (LNR). Habitat areas which meet the published selection criteria for county site designations, but which are not themselves designated as such. Species – as per National level but where the loss of these populations would negatively affect the conservation status or distribution of the species at a regional/county level and where populations/species are critical at the regional/county scale.
District/Borough	Non-statutory designated wildlife sites of district/borough value. Species – as per **Regional/County** level but where the loss of these populations would negatively affect the conservation status or distribution of the species at a **district** level and where populations/species are critical at the **district/ borough** scale. This may include locally significant populations of a species listed and areas of habitat in a District/Borough Biodiversity Action Plan (BAP) on account of its regional rarity or localisation.
Local	Non statutory designated sites of local value. Areas of habitat considered to appreciably enrich the habitat resource within the local context (e.g. species-rich hedgerows, ponds etc.). It may also include sites that retain other elements of semi-natural vegetation that due to their size, quality or the wide distribution of such habitats within the local area are not considered for local designations. Populations/assemblages of species that appreciably enrich the biodiversity resource within the local context. Populations of county level important species that are not threatened or rare in the county and are not integral to maintaining those populations.

Geographical Level of Importance	Category
Site	Habitats and/or species that are of limited ecological importance due to their size, species composition or other factors. Areas of heavily modified or managed vegetation of low species diversity. Low or moderate numbers of common and widespread species.
Legislation	Species included on Schedules II and V of The Conservation of Habitats and Species Regulations 2017 (as amended). Species included on Schedules 1, 5 and 8 of the Wildlife and Countryside Act 1981 (as amended), excluding species that are only protected in relation to their sale (Section 9[5] and 13[2]). Badgers, which are protected under the Protection of Badgers Act 1992. The Natural Environment and Rural Communities (NERC) Act 2006 provides that any public body or statutory undertaker in England and Wales must have regard to the purpose of conservation of biological diversity in the exercise of their functions. The Environment Act 2021 is an Act to make provision about targets, plans and policies for improving the natural environment.

6.7 Landscape and Visual Impact Assessment

6.7.1 Baseline Conditions and Key Issues

The Application Site is located to the south-eastern edge of the town of Ashford and is bounded by the A2070 to the north which connects with the M20 motorway to the north-east at Junction 10a. Church Road and Highfield Lane boarders the west, south and eastern boundaries of the Application Site. Residential properties and the Channel Tunnel Rail Link are located just beyond Church Road to the south-west. Transport corridors are dominant features within the area which connect the Application Site with Maidstone to the north-west, Folkstone and Dover to the south-east and New Romney to the south. The landscape consists of a mix of large open agricultural fields and historic villages as well as busy transport corridors connecting larger settlements. The A2070 skirts around the southern edge of Ashford and adjoining this to the north is a retail and business park which separate the Application Site with the rest of the town to the north.

The Application Site itself does not fall within any statutory and non-statutory designations, however there are a number of designations and sensitive landscape features within the area, these include:

- Kent Downs National Landscape, which lies approximately 2.6km north-east of the Application Site;
- Hatch Park Grade II Listed Registered Park and Garden approximately 480m east of the Application Site;
- Various Listed Buildings, including a cluster of buildings adjacent to the south-west boundary and along Kingsford Street close to the north-east boundary;
- Two Scheduled Monuments, including a Moated Site and Associated Garden Earthworks approximately 390m west of the Application Site and Medieval Moated Site, Quarrington Manor approximately 1.45km north-east of the Application Site;
- Ashford Green Corridors Local Nature Reserve, located approximately 70m west of the Application Site;
- Three Conservation Areas, including Willesborough Lees, approximately 1.5km north-west of the Application Site, Lacton Green north-east of the Application Site and Mersham village, approximately 850m south-east of the Application Site;
- National Cycle Network Route 18, located approximately 1.5km north of the Application Site; and

- Various Public Rights of Way (PRoW) that criss-cross through the landscape including one Bridleway (AE672) that crosses slightly into the south-west corner and north-west corner of the Application Site.

Visual

The effects of the Application Site on identified viewpoints and the character of the landscape will be tested as part of the submission; these align with those assessed within the LVIA submitted with the SDO application (Section 3.4 and Appendix F within **Appendix 2**). A Zone of Theoretical Visibility (ZTV) was carried out to assist in selecting the viewpoint locations, which is shown on **Drawing 419419-MMD-01-MO-DR-L-3019** (see Appendix F within **Appendix 2**). The viewpoint locations are shown on **Visual Receptor Plan 419419-MMD-01-MO-DR-L-3017** and **Visual Impact Plan 419419-MMD-XX-SV-VS-YE-0004** (see Appendix F within **Appendix 2**). As a result of the Application Site, PRoW AE672 has been diverted and instead of passing through the central part of the Application Site now passes around outside of the Application Site to the south-west, west and north-west boundaries. Small sections of this pass within the Application Site to the south-west and north-west corners. As a result of this diversion, Viewpoint 6, which was representative of footpath users crossing through the central part of the Application has been omitted.

Potential receptors:

- Viewpoint 1 – PRoW AE639 and residential property (Court Lodge) on lane leading off A2070.
- Viewpoint 2 – St Mary's Church, Sevington on lane leading off A2070.
- Viewpoint 3 – PRoW crossing A2070 footbridge leading to St Mary's Church, Sevington.
- Viewpoint 4 – Residential properties on eastern edge of Ashford (Willesborough) .
- Viewpoint 5 – PRoW AU534 off Hythe Road representative of views from residential properties along the A20.
- Viewpoint 7 – Representative of residential properties on Kingsford Street (western end).
- Viewpoint 8 – Representative of residential properties on Kingsford Street (eastern end).
- Viewpoint 9 - Residential properties on Blind Lane, Mersham.
- Viewpoint 10– PRoW AE363 off Blind Lane, Mersham.
- Viewpoint 11– PRoW AE365 off Church Road, Mersham.
- Viewpoint 12 - Residential property (Hillcrest) off Blind Lane, Mersham.
- Viewpoint 13 - Residential properties on Cheeseman's Green Lane.
- Viewpoint 14– PRoW AE401 on Collier's Hill, east of Cheeseman's Green Lane.
- Viewpoint 15 – PRoW on Waterbrook Avenue junction between PRoW AE667A and AE350.
- Viewpoint 16 – Representative of residential properties (May Tree Cottage and Bridge Cottage) adjacent to junction off Church Road/Highfield Lane and Cheeseman's Green Lane.
- Viewpoint 17 – Representative of residential properties on Church Road.
- Viewpoint 18– PRoW AE138 at Devils' Kneading Trough, representative of elevated views from within Kent Downs AONB.

6.7.2 Likely Significant Effects

The potential effects of the Development will be assessed under the following headings:

Complete and operational Development:

- Effect on the value of landscape character of the Application Site and surrounding area as a result of the operation of the Development. This will include the change of land use and landscape character features;

- Effect of the Development on visual receptors. This will include the presence of built form and change in land use;
- Following further consultation, a night time assessment will be undertaken to include a selection of night time views where appropriate; and
- Cumulative effects with other committed developments on landscape and visual receptors agreed in the baseline assessment.

6.7.3 Approach and Methodology

The Landscape and Visual Impact Assessment (LVIA) will provide an assessment of the effect of the Development on landscape and visual receptors. The framework for assessment of landscape and visual receptors will follow the Guidelines for Landscape and Visual Impact Assessment, Third Edition (Landscape Institute and Institute of Environmental Management and Assessment, 2013) ('GLVIA3').

For the purposes of assessment, effects of moderate and above (beneficial or adverse) would be considered as significant.

The two components of the landscape and visual impact assessment are:

- Assessment of landscape effects: assessing effects on the landscape as a resource in its own right; and
- Assessment of visual effects: assessing effects on specific views and on the general visual amenity experienced by people.

Site observations, a manual desk-based review of OS maps, characterisation studies and relevant heritage receptors have been used to determine the study area of 1km. The study area has been informed by building locations and heights, topography and landscape features, and an understanding of the scale of the Development. The visual extent of the study area has been determined through manual based assessment and will be verified using 3-dimensional map data.

7. Cumulative Effects

The EIA Regulations require that, in assessing the likely significant effects of a particular project, consideration is given to the likely significant cumulative effects that may arise from the project in combination with other existing and / or approved projects. Cumulative effects can be categorised into two types:

- **Type 1 Impact Interactions:** different effects arising from the Development (e.g. noise, dust and visual effects) that all impact upon a single receptor; and
- **Type 2 Combined Effects:** effects arising from the Development together with other existing and / or approved projects which individually might be insignificant, but when considered together, could create a significant cumulative effect.

7.1 Approach and Methodology

Type 1 impact interactions occur where effects can occur together on nearby sensitive receptors. These would be qualitatively assessed using the findings of the individual EIA technical studies within the ES, together with professional judgement.

In respect of Type 2 combined effects, as part of the SDO application, 10 cumulative schemes were identified using criteria relating location (sites within 4km of the SDO site) and delivery timescales (over a similar timeframe) (Section 3.12 and Appendix M within **Appendix 2**).

For the EIA, which will accompany the full planning application, a set of specific criteria were established to determine the existing and / or approved projects to be included within the assessment. Based upon experience of many EIA projects, these criteria are:

- Projects within 2km of the Application Site with:
  a) valid planning permission (or those submitted and likely to be approved prior to the Development);
  b) EIA Developments;
  c) non-residential floorspace uplift of greater than 10,000m^2 Gross External Area (GEA);
  d) more than 150 residential units;
  e) a total site area of greater than 5ha; and
  f) new sensitive receptors near to the Application Site.
- Projects in excess of 2km where there is substantial development proposed, where an EIA is required, and where there is potential for cumulative effects to occur.

It should be noted that a number of the technical assessment will use bespoke criteria to identify cumulative schemes, where this is applicable this shall be clearly identified.

Combining the 10 cumulative schemes identified for the SDO application, and those additional schemes identified in accordance with the above criteria, Table 1 within **Appendix 4** sets out which of these schemes will be considered as cumulative schemes. Where schemes are excluded, justification is provided, for example, where a scheme is complete and operational this now forms part of the baseline. Table 1 within **Appendix 4** confirms which cumulative schemes will be included and assessed in the EIA; the location of these schemes is shown in **Figure 6**.

Where applications have been made and which are currently under consideration by the local authority, these will be monitored carefully. Since such schemes do not have planning consent, there is no certainty regarding their implementation, and thus do not constitute a cumulative scheme as set out in the EIA Regulations. This approach is in accordance with the EIA Regulations, where the ES need only consider those schemes which have a valid planning permission and are therefore existing and/or approved projects.

Type 2 combined effects will typically be considered within each respective technical chapter. Type 1 impact interactions will be considered within the 'Cumulative Effects' chapter of the ES (see **Section 10**) by taking the effects identified in each technical chapter and referencing these all in a single table for clarity.

8. Other Topic Areas to be Referenced in the ES

There is one topic area which substantially overlaps with other proposed ES chapters and documents to be submitted in support of the outline planning application: Human Health.

8.1 Human Health

Due to the nature of the scheme and the considered overlaps, it is proposed that information relating to these topic areas is referenced within the relevant ES chapters, such as noise and air quality, as opposed to preparing separate chapters / assessments for this topic. Further specific details for each of these topics is set out in **Section 6**.

9. Topics Proposed to be 'Scoped Out' of the ES

As already noted, the aim of this EIA Scoping Report is to focus the EIA on those environmental issues that are likely to be significantly affected by the Development. In doing so, issues may be 'scoped out' for a variety of reasons, including:

- a significant environmental effect is unlikely to occur as the receiving environment (baseline conditions) are not considered to be particularly sensitive;
- a potentially significant environmental effect can be suitably avoided or mitigated through the design of the Development or through the implementation of established mitigation measures so that it either does not occur or the effect is insignificant; or
- effects (e.g. on human health) may already be sufficiently assessed in the ES through consideration in other technical chapters (i.e. air quality and noise).

The following section sets out the issues that are intended to be 'scoped out' of the EIA and resultant ES. Where matters are relevant, it is proposed to provide 'sign-posting' within the ES document (likely **Chapter 2: EIA Methodology**) as to where relevant matters are addressed as part of various topic areas scoped into the ES. Some topics scoped out of the ES may be covered in technical assessments submitted to support the planning application. If relevant, then these technical reports are highlighted under the relevant discipline below. It is acknowledged that scoping is an ongoing process. Should any aspect currently proposed to be scoped out of the EIA/ES later be deemed to result in likely significant effects (and vice versa), then this will be discussed with ABC and reported in the EIA Methodology chapter of the ES.

9.1 Ground Conditions and Contamination

Mott MacDonald Limited prepared a Geotechnical and Geo-environmental Desk Study to support the SDO application, this is included as a technical appendix (Section 3.5 and Appendix G within **Appendix 2**). The Geotechnical and Geo-environmental Desk Study provides a conceptual model for the site, based on a review of the environmental datasets, historical maps, a site inspection, and previous ground condition reports.

A summary of the historical use, potential sources of contamination, local geology, hydrogeology and hydrology, relevant to the Application Site, is presented below.

Prior to construction of the IBF, constructed in 2021 under a temporary planning permission, and as assessed in the 2020 Mott MacDonald report, the Application Site comprised an arable field with no significant built structures. The A2070 bound the Application Site to the west, Church Road and railway line to the south, Ashford Business Park to the east, and a farm, church, and equine centre to the north-west. Historically the Application Site has remained in use as agricultural land with no notable built structures or surface features identified.

The Geotechnical and Geo-environmental Desk Study included a review of an intrusive ground investigation completed by Card Geotechnics Limited in 2012 on-site. The ground investigation comprised: 4No. boreholes (10.05 – 14.45mbgl), 7No. window samples (1.0 – 5.0mbgl), 21No. trial pits (1.2 – 5.0mbgl), and 21No. dynamic probe tests (1.25 – 10.0mbgl). Ground conditions encountered identified two specific zones. The northern two thirds encountered substantial thicknesses of the Hythe Formation (10m thick) and the southern third a reduced thickness of the Hythe Formation (2.7 – 8.1m thick). The Hythe Formation was overlain by topsoil 0.2 – 0.9m thick and underlain by the Atherfield Clay Formation. Analysis of recovered soil contaminated land laboratory results for a commercial end use identified no elevated contaminants. Completed ground gas monitoring identified ground gas concentrations and flow rates consistent with a Characteristic Situation 1 (CS1) (very low risk) ground gas regime.

Based on the ground investigation results and the Development considering the Site's environmental setting the Mott MacDonald report concluded the following;

- A low risk to future end users from existing contamination, with significant contamination unlikely to be encountered during development;
- A low risk from ground gas was present and mitigation measures would not be required.
- The risk to groundwater was low and surface waters was moderate/low given the low likelihood of existing contamination and measures included in the surface water drainage strategy (lined attenuation ponds and no infiltration to ground).
- A low risk to buried structures or infrastructure; and
- A low risk to construction workers on the assumption workers would adhere to a site specific risk assessment and method statement.

Based on the contaminated land work completed and the associated results Mott MacDonald advised further ground investigation was not required, with remedial measures to break pollutant linkages not required.

The assessment completed by Mott MacDonald in their 2020 report has not identified active pollutant linkages to human health receptors or the environment in the completed Development. Significant effects which would represent potentially unacceptable risks to either human health receptors or the environment are absent.

Complete pollutant linkages post Development completion were identified as being absent with no significant risks to human health receptors or the environment. The Site is therefore of low risk and not capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 and the requirements of the NPPF would be met.

Furthermore, no major groundworks are proposed as part of the planning application, as no construction or demolition is planned. Only minor landscaping to the site's periphery may be undertaken, if necessary, in response to any potential effects identified through the EIA.

On the basis of the above, it is considered the Development is unlikely to give rise to significant adverse environmental effects in relation to ground conditions. Therefore, it is proposed that ground conditions and contamination is scoped out of the EIA.

A new **Preliminary Risk Assessment** will be undertaken for the Application Site, which will form a standalone document to support the planning application.

9.2 Agriculture and Soils

As set out in the environmental documents, for the SDO application (Section 3.5 with **Appendix 2**), it was reported that a permanent loss of Grade 2, Grade 3a and Grade 3b agricultural land is expected on the western parcel of land to facilitate the scheme. However, it was argued that considering the availability of Grade 2 agricultural land within the wider area, along with the opportunities for the re-use of this resource elsewhere, it was not considered that the loss of these agricultural soils would be significant. In addition, it was noted that construction works under the approved consent for the Stour Park Development (the RMA Phase 1A) had already commenced on site and as such the site was no longer an arable field with much of the agricultural resource lost to facilitate those works.

The Development does not include the loss of any additional agricultural land above that lost due to the implementation of the SDO development.

Therefore, in overall conclusion, the Development would not give rise to any likely significant effects upon agriculture or soils and will not be considered further within the EIA or reported in the ES.

9.3 Climate Change

There is potential for effects on climate, due to the change in GHG emissions from an increased number of HGVs travelling to the Application Site during operation of the Development and the impacts of this upon regional traffic flows.

The climate change assessment (Section 3.11 and Appendix L within **Appendix 2**) reported that the quantity of emissions (over the five years) was relatively small equating to approximately 0.00017% of the UK 4th Carbon Budget[20] and through the implementation of the carbon reduction principles, detailed in Appendix L (within **Appendix 2**), the emissions have been minimised as far as possible. The climate change assessment concluded that the carbon emissions would not have a significant effect. Despite this, best practice measures such as enabling waste to be effectively segregated during operation to enable materials to be managed using the waste hierarchy, where possible, measures would be put in place to limit profligate energy use by unintended user behaviours.

It was also noted that the IBF may be vulnerable to extreme weather as a result of climate change during operation. However, it was concluded that as the drainage infrastructure would remain in situ following the five-year consent, the drainage has been designed in accordance with the Design and Construction Guidance (2020) for the one in 100-year storm event plus a 40% allowance for climate change. No significant effects on the IBF were anticipated as a result of climate change.

Given that emissions from the operation of the IBF are relatively small, which would continue to be so with the Development, together with the implemented carbon reduction measures, which would remain in situ and unchanged, no significant climate impacts are anticipated as a result of the Development. As such, it is proposed that climate change is scoped out of the EIA.

Due to the nature of the scheme and the considered overlaps, it is proposed that information relating to climate change is referenced within the relevant ES chapters, such as Air Quality. Further specific details for each of these topics is set out in **Section 6**.

9.4 Daylight, Sunlight and Overshadowing and Solar Glare

9.4.1 Daylight, Sunlight and Overshadowing

Daylight, Sunlight and Overshadowing considerations are primarily concerned with effects to natural light amenity received to existing dwellings and open spaces such as gardens and parks.

The predominant character of the current context would be considered commercial, semi-rural with a limited number of dwellings in close proximity.

To the north and west of the Application Site are road uses, to the south are rail uses, to the east are agricultural uses, none of which are sensitive to these types of effect. Whilst there are a small number of dwellings within proximity of the Application Site, given the majority of the Application Site is used for ground level, vehicle parking and that the building heights do not exceed 9.032m in height, no daylight, sunlight or overshadowing effects are considered to be likely.

Therefore, in overall conclusion, any effects related to daylight, sunlight and overshadowing are not likely to be significant and will not be considered further within the EIA or reported in the ES.

9.4.2 Solar Glare

Solar glare has the potential to cause significant adverse effects in some circumstances where a proposed development is in the vicinity of major road junctions or rail signalling points.

The location / alignment of any sensitive locations relative to the Development, annual sunpath and line of sight are key considerations, together with the materiality/ finish of the buildings and structures proposed. The potential issue arises mainly where the new development is located in the direct line of sight and creates “disability glare” which materially affects signal visibility.

The Development is in the vicinity of a major road junction (to the north and west) and railway (to the south). However, the intervening topography, vegetation and the non-reflective finish of the structures and buildings proposed would not give rise to any solar glare.

[20] A negligible amount of negative emissions are reported for the 3rd Carbon Budget so total operation emissions are compared to the 4th Carbon Budget (2023-2027)

Therefore, in overall conclusion, any effects related to solar glare are not likely to be significant and will not be considered further within the EIA or reported in the ES.

9.5 Light Pollution

Light pollution is the term used to describe the brightening of the night sky as a result of upwardly directed light which is then reflected off dust and water droplets in the sky. Light trespass is the spilling of light beyond the boundary of the lit area, causing interference and annoyance to neighbours.

To support the planning application, a external lighting desktop study will be produced (using RELUX Pro software) to establish and minimise artificial light pollution.

The external lighting will be designed in accordance with the following documents:

- British Standard BS EN 12464-2:2014 Light and lighting. Lighting of work places. Outdoor work place.
- The Society of Light and Lighting - the SLL Lighting Handbook
- The Society of Light and Lighting - Lighting Guide 6: The Exterior Environment

The external lighting model will examine and determine the compliance with the above documents and recommend any improvements to comply with maximum obtrusive light permitted for exterior lighting installation.

Potential complaints about light pollution from exterior lighting can be divided into two categories, light trespass and skyglow (direct upward light) (see **Figure 7**).

Light trespass is associated with complaints from individuals in a specific location. It includes a complaint about light from an external lighting luminaire entering a bedroom window and keeping the occupant awake. Light trespass will be avoided by the careful selection, positioning, aiming and shielding of luminaires and by operating a curfew system where lighting is only available during specified times.

The Institution of Lighting Engineers (ILE) provides guidance on the vertical illuminance that should be allowed to fall on windows, the maximum luminous intensity of any obtrusive light source and a maximum building luminance for floodlighting. These limits are different for different environmental zones. The idea behind environmental zones is that some locations are more sensitive to light pollution than others. Table 2 shows the four environmental zones identified by the CIE. The limits recommended by the ILE for limiting light trespass are also set out in Table 2 of BS EN 12464-2:2014 (see excerpt as **Table 7**).

Table 7: Maximum Obtrusive Light Permitted for Exterior Lighting Installations

Table 2 — Maximum obtrusive light permitted for exterior lighting installations

Environmental zone	Light on properties		Luminaire intensity		Upward light ratio	Luminance	
	E_v lx		I cd		R_{UL} %	L_b cd·m^{-2}	L_s cd·m^{-2}
	Pre-curfew[a]	Post-curfew	Pre-curfew	Post-curfew		Building facade	Signs
E1	2	0	2 500	0	0	0	50
E2	5	1	7 500	500	5	5	400
E3	10	2	10 000	1 000	15	10	800
E4	25	5	25 000	2 500	25	25	1 000

where

E1 represents intrinsically dark areas, such as national parks or protected sites;

E2 represents low district brightness areas, such as industrial or residential rural areas;

E3 represents medium district brightness areas, such as industrial or residential suburbs;

E4 represents high district brightness areas, such as town centres and commercial areas;

E_v is the maximum value of vertical illuminance on properties in lx;

I is the light intensity of each source in the potentially obtrusive direction in cd;

R_{UL} is the proportion of the flux of the luminaire(s) that is emitted above the horizontal, when the luminaire(s) is (are) mounted in its (their) installed position and attitude, and given in %;

L_b is the maximum average luminance of the facade of a building in cd·m^{-2};

L_s is the maximum average luminance of signs in cd·m^{-2}.

[a] In case no curfew regulations are available, the higher values shall not be exceeded and the lower values should be taken as preferable limits.

Source: Table 2: BS EN 12464-2:2014 Light and lighting. Lighting of work places. Outdoor work place

The external lighting design of the IBF will be subject to meticulous study as part of the planning application. A standalone **External Lighting Assessment** will be prepared and submitted to accompany the planning application. The report will stipulate lux level, uniformity, glare and upward light ratio.

The Environmental Zones (**Table 8**) will be categorised as follow:

Table 8: Environmental Zones

Category	Examples
E1: Intrinsically dark area	National Park, Areas of Outstanding Natural Beauty, etc.
E2: Low district brightness area	Rural or small village locations
E3: Medium District brightness area	Small town city centre or urban locations
E4: High district brightness area	Town / City Centre with high level of night - time activity

9.6 Risk(s) of Major Accidents and / or Disasters

The EIA Regulations relate to a very broad range of development types. These development types include, for example, power stations and hazardous waste facilities. It is these project types that would be more likely prone to major accidents and / or disasters rather than commercial project such as the Development. It therefore follows that the consideration of risk(s) of major accidence and / or disasters in the context of EIA needs to be proportionate to the likelihood of the risk(s).

In relation to the Application Site and the Development, a desk-based review has ascertained the following in relation to potential risk(s) of major accidents and / or disasters:

- The Application Site is not in an area that could be affected by coal or metalliferous mining activity;
- There are no Control of Major Accident Hazard (COMAH) sites within 500m of the Application Site;
- The Application Site lies within a radon affected area, with a maximum radon potential of 1-3%;
- The Application Site is not at risk of flooding now or in the future, as a result of climate change, as noted in **Section 9.9 (Flood Risk)** below.

Whilst the Development introduces new human receptors to the Application Site (employees and visitors), this would not result in an increased risk of these receptors being affected by the potential man-made and natural hazards identified above. Accounting for the above, the risk(s) to the Development arising from major accidents and / or disasters is considered unlikely and can be scoped out of the ES.

9.7 Waste

It is inevitable that waste would be generated from the Development, this would be the case for any project and the critical aspect is how this waste is managed. However, it is important to note that the construction of the existing structures has already taken place under the previous consent.

The IBF is already operating. The waste types arising can be broadly split into those generated by having offices, staff facilities including for visiting drivers and general site operations, and those generated by the inspection activities. The Contractor responsible for operating the facility has developed operational waste management plans and established arrangements with waste management services providers to deliver offsite waste management solutions for all anticipated waste types.

The office activities, staff and visiting driver facilities generate a range of non-hazardous wastes including mixed dry recyclable wastes (e.g. paper, cans, plastics), sanitary / hygiene wastes and residual waste (non-recyclables wastes from offices etc) and hazardous wastes including used spill kits and batteries. These waste streams are subject to contractual targets of less than 5% waste to landfill and at least 70% of waste to be recycled.

The inspections process can result in loads being held and if the reason for the hold cannot be resolved the load will be retained and disposed of. All waste is disposed of from the Site. Wastes comprising of animals, animal products, animal by-products, animal feed, waste from holding animals or plants are dispatched for incineration. Liquid waste from animal holding areas is also dispatched for treatment offsite.

It is noted that the guidance for the assessment of waste in EIA identifies a single sensitive receptor type, namely landfill void capacity. Given the current arrangements in place including contractual landfill diversion target, it is considered that the impact of the Development in relation to waste will not be significant in EIA terms. Based on the above, it is proposed to scope out an assessment of the Development's effects on waste. Further detail on operational waste management practices will be included in the planning application (**Operational Waste Management Strategy**) and used to inform the Description of Development Chapter of the ES.

9.8 Wind Microclimate

The pre-development baseline for the Application Site comprises a plot, devoid of any built structures, and includes areas of hardstanding (access and estate roads), together landscaping and drainage within areas of open space. As a result of the Development, the change in massing of the building may alter the wind microclimate at ground level. However, the Development would not exceed 20m above ground level and therefore not considered to be tall enough to cause any significant wind microclimate changes.

It is therefore considered that wind microclimate would not require assessment within the EIA.

9.9 Flood Risk and Drainage

The Environment Agency's flood risk maps indicate that the entirety of the Application Site is situated within Flood Zone 1. Flood Zone 1 represents areas with a low probability of fluvial or tidal flooding, defined as having less than a 1 in 1,000 annual probability of flooding (i.e., a probability of less than 0.1% annually). Despite the Application Site having a low flood risk of flooding, the National Planning Policy Framework (NPPF) requires a Flood Risk Assessment (FRA) to be conducted for developments over 1 hectare in size. As the Application Site covers approximately 48 hectares, a comprehensive FRA will be prepared to ensure that the Development does not exacerbate flood risks either on-site or off-site.

Surface Water and Drainage Management

The FRA and Drainage Strategy, prepared to support the SDO application (Section 3.10 and Appendix K within **Appendix 2**), confirms that there are no significant risks of fluvial or tidal flooding at the SDO site, but potential risks from surface water runoff and groundwater have been carefully assessed. The surface water drainage system, for the IBF, has been designed following the principles of Sustainable Drainage Systems (SuDS) to manage surface water runoff effectively and reduce flood risk.

The surface water drainage strategy, prepared for the SDO application, reported that it will:

- Control runoff rates by limiting the post-development discharge to greenfield runoff rates.
- Attenuate surface water through a series of SuDS features, including swales, detention basins, and infiltration ponds.
- Ensure that surface water discharge is appropriately managed through controlled outfalls to the existing drainage network, including Old Mill Stream and various culverts under the nearby HS1 railway line.

These SuDS features will ensure that the risk of surface water flooding is minimised both on-site and downstream by replicating natural hydrological conditions and promoting infiltration where feasible. The design also accounted for climate change by considering the potential for increased rainfall intensity in the future. The drainage system was designed to accommodate storm events up to and including the 1 in 100-year storm event, with an additional 40% allowance for climate change.

Interaction with Existing Watercourses and Infrastructure

The SDO site is divided into several surface water catchments that will each manage runoff through a combination of surface attenuation and controlled outfalls:

- Northern Catchments: Surface water runoff from the northern portion of the site will be directed to the Old Mill Stream through a series of swales and wetlands. This will maintain natural drainage patterns and reduce the risk of downstream flooding.
- Southern Catchments: Runoff from the southern part of the site will be collected and conveyed through controlled outlets into existing culverts beneath the HS1 railway line, which discharge into tributaries of the East Stour River.

As part of the drainage strategy, the capacity and condition of these culverts was assessed. Improvements were proposed to ensure the attenuated flows, from the IBF, would be accommodated without increasing the risk of flooding.

Long-term Flood Risk Management in Operation

The focus of the long-term flood risk management plan, during the operation of the IBF, has been on mitigating any potential sources of flooding over the lifetime of the development. As set out above, the drainage system, for the IBF, was designed to ensure that:

- Surface water runoff rates remain at greenfield levels through attenuation and controlled discharge.
- Exceedance events (i.e., rainfall events greater than the 1 in 100-year event) are managed through designated overland flow paths, ensuring water flows safely off-site without causing damage to infrastructure or increasing flood risks downstream.

The drainage design includes exceedance route planning, where surface water from extreme rainfall events will be directed towards natural low-lying areas or designated ponds. This is to prevent uncontrolled flooding of critical infrastructure, such as the border facility's operational areas, and will protect adjacent properties and infrastructure.

Foul Water Management

The foul water drainage system has been integrated with the surface water management plan to ensure seamless operation. Foul water from the IBF is pumped to an existing Southern Water pumping station located to the north-east of the Application Site. The capacity of this pumping station was assessed to ensure it could accommodate the increased flows generated by the operation of the IBF. In addition, emergency storage facilities were provided to store excess foul water during peak operational periods or in the event of a system failure, thus preventing any risk of flooding or contamination.

The FRA, which was submitted with the SDO (Section 3.10 and Appendix K within **Appendix 2**) was prepared in accordance with national and local policy requirements, including guidance from Kent County Council (the Lead Local Flood Authority) and Ashford Borough Council. The design of the drainage strategy has ensured that the development will not increase flood risk to the surrounding area. Mitigation measures, including SuDS, best practice construction management, and long-term maintenance plans, will ensure that flood risks are appropriately managed throughout the lifetime of the development.

In conclusion, given the comprehensive flood risk and drainage management measures in place, the Application Site is not expected to result in any significant environmental effects related to flood risk or drainage. The implementation of these measures means that flood risk and drainage concerns can be scoped out of the Environmental Statement.

A **Flood Risk Assessment**, further investigating and assessing any flood risk, will be submitted as a standalone document to support the planning application.

10. Proposed Structure of the Environmental Statement

10.1 Summary of Proposed Scope of the EIA

On the basis of the information presented in **Sections 6** and **9** of this report, **Table 10.1** sets out the proposed scope of the ES.

Table 9: Environmental Topics to be Assessed for the Operational Development

Environmental Topic	Operational Development
Air Quality	✓
Cultural Heritage	✓
Daylight, Sunlight and Overshadowing	×
Ecology and Biodiversity	✓
Flood Risk and Drainage	×
Greenhouse Gas and Climate Change	×
Ground Conditions and Contamination	×
Human Health (covered in Air and Noise)	×
Landscape and Visual	✓
Light Pollution and Solar Glare	×
Noise	✓
Risk(s) of Major Accidents and / or Natural Disasters	×
Socio-economics	✓
Transport and Access	✓
Vibration	×
Waste	×
Wind Microclimate	×

The ES would comprise the following:

- Volume 1: Main Text;
- Volume 2: Figures;
- Volume 3: LVIA
- Volume 4: Appendices; and
- Non-Technical Summary.

10.2 Environmental Statement Volume 1: Main Text

This would contain the findings of the EIA. **Table 10.2** provides an outline structure of the ES.

Table 10: Proposed Structure of the ES

ES Chapter	Author
1: Introduction	Waterman
2: EIA Methodology	Waterman
3: Existing Land Uses and Activities	Waterman
4: The Development	Waterman
5: Alternatives	Waterman
6: Socio Economics	Stantec
7: Transport and Access	Waterman
8: Air Quality	Waterman
9: Noise and Vibration	Waterman
10: Cultural Heritage	Lanpro
11: Ecology and Biodiversity	Waterman
12: Summary of Residual Effects	Waterman
13: Cumulative Effects	Waterman
14: Next Steps	Waterman

10.3 Environmental Statement Volume 2: Figures

For ease of cross referencing, figures accompanying all the chapters of ES Volume 1 would be presented in a separate volume.

10.4 Environmental Statement Volume 3: Appendices

This would provide detailed supporting data, information and the full text of all relevant technical assessments undertaken as part of the EIA.

10.5 Environmental Statement Volume 4: LVIA

Due to the relative size and presentational requirements of the landscape and visual impact assessment, it will be presented in a separate volume.

10.6 Non-Technical Summary

This would provide an accurate and balanced account of the key information in the EIA in non-technical language. The Non-Technical Summary (NTS) would be produced as a stand-alone document in a format suitable for public dissemination.

11. Next Steps

This request for a scoping opinion is made under Regulation 15 of the EIA Regulations 2017.

Under Regulation 15(4) ABC must, within 5 weeks beginning with the date on which that request was received, or such longer period as may be agreed in writing with the person making the request, adopt a scoping opinion and must send a copy to the person who made the request.

In accordance with Regulation 15(3), should ABC consider that they have not been provided with sufficient information to adopt an EIA scoping opinion, they should notify the person making the request of the points on which they require additional information.

FIGURES

SITE LOCATION

Contains OS data © Crown Copyright and database right 2023
Contains data from OS Zoomstack

0 0.25 0.5 1 km

Project Details	WIE20982-100: Sevington Inland Border Facility, Ashford
Figure Title	Figure 1: Application Site Location
Figure Ref	20982100-WAT-XX-XX-GS-N-760001
Date	2024
File Location	N:\Projects\WIE20982-100\9_GIS\20982100-WAT-XX-XX-GS-N-76

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waterman

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LEGEND

APPLICATION BOUNDARY
Boundary interfaces between future development Plots

EASEMENT TO EXISTING PIPELINE
Easement of 9m required either side of the HP gas main

AREA EXCLUDED FROM APPLICATION

SOFT LANDSCAPE

EXISTING TREES RETAINED
Trees to be protected in accordance with BS 5837 (2012)

PROPOSED LARGE SPECIMEN TREE

PROPOSED SMALL SPECIMEN TREE

PROPOSED MULTI-STEMMED TREE

PROPOSED EVERGREEN TREE

PROPOSED NATIVE HEDGE PLANTING

PROPOSED ORNAMENTAL HEDGE PLANTING

PROPOSED EDIBLE HEDGE PLANTING
Adjacent to the orchard

PROPOSED WOODLAND UNDERSTORY
To be under planted with Ground Flora & Grass Mixture for Hedgerows and Woodland EG9 by Emorsgate Seeds sown at 5g/m2

PROPOSED SHRUB PLANTING
Shrub and ground cover mix

PROPOSED NATIVE SHRUB PLANTING

AMENITY GRASS MIX
Wear Tolerent Turf Grass Mix EG22 by Emorsgate Seeds sown at 25g/m2

TUSSOCK GRASS MIX
EG10 by Emorsgate Seeds sown at 5g/m2

PROPOSED WILDFLOWER MEADOW
Standard General purpose Meadow Mixture EM2 by Emorsgate Seeds sown at 4g/m2

BULB PLANTING

PROPOSED LOW ORNAMENTAL SHRUB PLANTING
Adjacent to internal roads

PROPOSED NATIVE SHRUB PLANTING ON POND BANKS

EXISTING HEDGEROW ALONG HIGHFIELD LAND
To be retained and maintained where appropriate to the development. Gaps in hedge to be infilled appropriately (ecologist to advise)

DRAINAGE FEATURES

PROPOSED PERMANENTLY WET PONDS
Refer to engineers' details and specification. To include Floating-Leaved Vegetation and Aquatics / Oxygenators

PROPOSED WETLAND PLANTING
To include Emergent Species and Marginal Species (ecologist to advise at instilation)

PROPOSED WILDFLOWER POND EDGE MIX
Wildflower Pond Edge mixture EP1 by Emorsgate Seeds sown at 4g/sqm

HARD LANDSCAPE

FUTURE ROAD CONNECTIONS

BLACKTOP TARMAC WITH CONCRETE KERB
To main vehicular areas. To engineers' details & specification to meet adoptable standards.

BLACKTOP TARMAC WITH PIN KERB
To edge to footpath adjacent to Estate Roads.To engineers' details & specification to meet adoptable standards.

PROPOSED CYCLEWAY

DUSTED GRAVEL PATH
2m With timber edge to footpath within open space areas

TYPE 1 PATH
3m With concrete edge

EXISTING PEDESTRIAN RIGHTS OF WAY/ FOOTPATH TO REMAIN

LAND RESERVED FOR FUTURE LINK ROAD

PROPOSED TIMBER BOARDWALKS

PROPOSED LANDFORM
To engineers' details & specification

TIMBER BENCHES
Refer to Hard Works Typologies 11107_PL_12_701

PROPOSED TIMBER BRIDGE

PROPOSED OUTFALLS
To engineers' details & specification

LITTER BIN
Refer to Hard Works Typologies 11107_PL_12_701

DOG BIN
Refer to Hard Works Typologies 11107_PL_12_701

INTERPRETATION BOARDS
4no. located across the site. Refer to Hard Works Typologies 11107_PL_12_701

ECOLOGICAL ENHANCEMENTS - All shown indicatively

1. BAT BOXES
Approximate location of bat boxes to include a mix of Schwegler 2F, 2FDFP and IFF boxes

2. BIRD NEST BOXES
Approximate location of Schwegler 3SV bird nesting boxes

3. STARLING NESTING BOXES
Approximate location of Schwegler starling nesting boxes

4. ROBIN BOXES
Approximate location of Schwegler 2H robin boxes

5. OWL BOXES
Approximate location of Schwegler owl boxes

6. REPTILE HIBERNACULA

7. INVERTEBRATE LOGPILES

0 50 100
Scale 1:1250

HE INFORMATION SHOWN INDICATIVELY SUBJECT TO SEPARATE APPLICATIONS

PLOT 7

PLOT 6

LIMIT OF WORKS

DEVELOPMENT PLOTS SHOWN INDICATIVELY SUBJECT TO SEPARATE APPLICATIONS

PLOT 1

For continuation refer to drawing 11107_PL_12_005 General Arrangement - Sheet 2 of 2

Revisions: Drawn/Chkd: Date:

A. Planning Comments Incoporated EM Apr.'19
B. Planning Comments Incoporated EM May 19
C. KCC tarmacadam Comments incorporated AR June.'19

NOTES

1. FOR PROPOSED FINISHED LEVELS AND LAND CONTOUR FOR HARD LANDSCAPING PLEASE REFER TO ENGINEERS DRAWING REFERENCE 08-125 / 423
2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT ENGINEER'S DRAWINGS AND THE SPECIFICATION.
3. ALL WORKMANSHIP AND MATERIALS ARE TO COMPLY WITH THE SPECIFICATION, BUILDING REGULATIONS, RELEVANT BRITISH STANDARD AND MANUFACTURERS RECOMMENDATIONS.
4. THIS DRAWING IS NOT TO BE SCALED. ALL DIMENSIONS ARE IN MM UNLESS NOTED OTHERWISE.
5. SITE AND DISCREPANCIES REPORTED TO THE CONTRACT ADMINISTRATOR.
6. ECOLOGICAL ENHANCEMENTS LOCATIONS ARE APPROXIMATE AND WILL BE DETERMINED BY AN ECOLOGIST WHEN THE FEATURES ARE INSTALLED, AND THAT BAT AND BIRD BOXES SHOULD BE INSTALLED ON POSTS, OR ON SPECIMEN TREES AFTER FIVE YEARS OF GROWTH.

Location Plan NTS

Client:
AVIVA LIFE AND PENSIONS UK LTD

Project:
STOUR PARK WEST PHASE 1
INFRASTRUCTURE WORKS
RMA/PRE-START CONDITIONS

Drawing Title:
ILLUSTRATIVE LANDSCAPE MASTERPLAN COLOURED SHEET 1

Scale@A1:	Checked by:	Date:
1/1250	AR	MAR.'19

Job No:	Stage:	Drawing No:	Rev:
11107	PL	12_004	C

Issue Status:
Construction ☐ Preliminary ☐
Information ☐ Approval ☒
Tender ☐

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Architecture
Planning
Master Planning
Urban Design
Interiors
Landscape

Offices
Woking
London
Milton Keynes
Warsaw

PRC Architecture & Planning

For continuation refer to drawing 11107_PL_12_004 General Arrangement - Sheet 1 of 2

PLOT 5

DEVELOPMENT PLOTS SHOWN INDICATIVELY SUBJECT TO SEPARATE APPLICATIONS

CAR PARK WITH FENCING AND ACCESS TO CHURCH (REFER TO PROPOSED CHURCH CAR PARK SITE LAYOUT REF.10601_005 REV C)

HE INFORMATION SHOWN INDICATIVELY SUBJECT TO SEPARATE APPLICATIONS

DEVELOPMENT PLOTS SHOWN INDICATIVELY SUBJECT TO SEPARATE APPLICATIONS

PLOT 1

PLOT 4

DEVELOPMENT PLOTS SHOWN INDICATIVELY SUBJECT TO SEPARATE APPLICATIONS

DEVELOPMENT PLOTS SHOWN INDICATIVELY SUBJECT TO SEPARATE APPLICATIONS

PLOT 2

PLOT 3

DEVELOPMENT PLOTS SHOWN INDICATIVELY SUBJECT TO SEPARATE APPLICATIONS

CHURCH ROAD

LIMIT OF WORKS

N

0 50 100

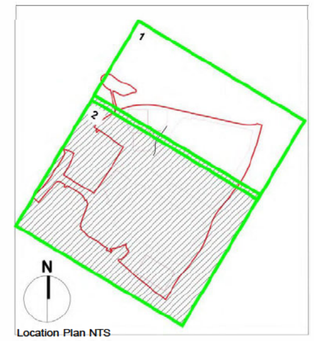
Scale 1:1250

Figured dimensions only are to be used. All dimensions to be checked onsite. Differences between drawings and between drawings and specification or bills of quantites to be reported to the PRC Group.

Revisions:	Drawn/Chkd:	Date:
A. Planning Comments Incoporated	EM	Apr.'19
B. Planning Comments Incoporated	EM	May19
C. Church car park amended	SA	Jun 19

NOTES

1. FOR LEGEND PLEASE REFER TO DRAWING 11107_PL_12_004
2. FOR PROPOSED FINISHED LEVELS AND LAND CONTOUR FOR HARD LANDSCAPING PLEASE REFER TO ENGINEERS DRAWING REFERENCE 08-125 / 423
3. THIS DRAWING 15 TO BE READ IN CONJUNCTION WITH ALL RELEVANT ENGINEER'S DRAWINGS AND THE SPECIFICATION.
4. ALL WORKMANSHIP AND MATERIALS ARE TO COMPLY WITH THE SPECIFICATION, BUILDING REGULATIONS, RELEVANT BRITISH STANDARD AND MANUFACTURERS RECOMMENDATIONS.
5. THIS DRAWING 15 NOT TO BE SCALED. ALL DIMENSIONS ARE IN MM UNLESS NOTED OTHERWISE.
6. SITE AND DISCREPANCIES REPORTED TO THE CONTRACT ADMINISTRATOR.
7. ECOLOGICAL ENHANCEMENTS LOCATIONS ARE APPROXIMATE AND WILL BE DETERMINED BY AN ECOLOGIST WHEN THE FEATURES ARE INSTALLED, AND THAT BAT AND BIRD BOXES SHOULD BE INSTALLED ON POSTS, OR ON SPECIMEN TREES AFTER FIVE YEARS OF GROWTH.



Location Plan NTS

Client:
AVIVA LIFE AND PENSIONS UK LTD

Project:
STOUR PARK WEST PHASE 1
INFRASTRUCTURE WORKS
RMA/PRE-START CONDITIONS

Drawing Title:
ILLUSTRATIVE LANDSCAPE MASTERPLAN COLOURED SHEET 2

Scale@A1:	Checkedby:	Date:
1/1250	AR	MAR.'19

Job No:	Stage:	Drawing No:	Rev:
11107	PL	12_005	C

Issue Status:
Construction ☐ Preliminary ☐
Information ☐ Approval ☒
Tender ☐

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