SEVINGTON
INLAND BORDER FACILITY

Department for Environment, Food & Rural Affairs

HM Revenue & Customs

Department for Transport

Sustainability Statement

April 2025

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Comments

Comments

Revision		Status	
P*nn*	Preliminary (shared; non-contractual)	S1	Coordination
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1. Introduction

1.1 Background

This Sustainability Statement has been prepared by Waterman Building Services Ltd (Waterman) on behalf of Department for Transport (DfT), His Majesty's Revenues & Customs (HMRC) and Department for Environment, Food and Rural Affairs (Defra) ('the Applicant') in support of a full planning application for Sevington Inland Border Facility (IBF). The Development is located at Sevington, Ashford TN25 6GE ("The Site") in the administrative area of Ashford Council.

This document describes the approach the design team has taken to integrate sustainability into the Development. The purpose of this report is to assess the extent of which the Development accords with the principles of sustainable development and the relevant planning policy requirements.

The project team for the assessment of the existing Development is comprised as follows:

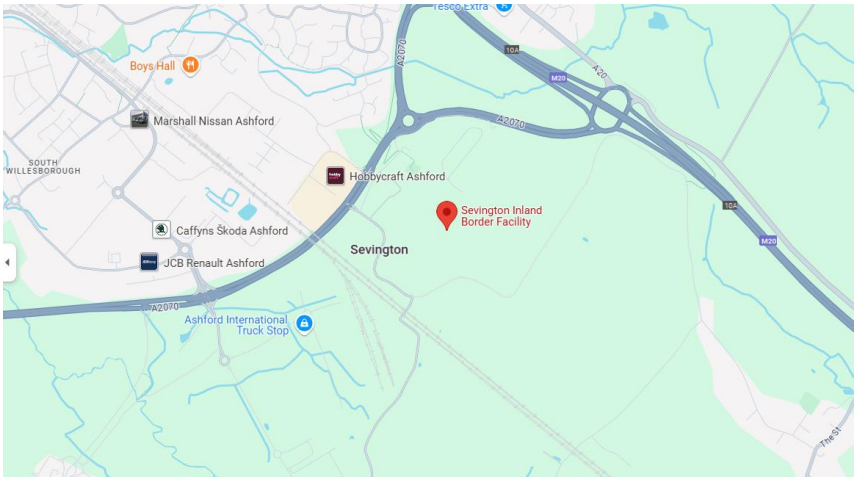
Table 1: Project Team

Project team	Representative
Applicant	Department for Transport (DfT), His Majesty's Revenues & Customs (HMRC) and Department for Environment, Food and Rural Affairs (Defra)
Architects	Chetwoods Architects
Structural & Civil Engineers	Waterman Infrastructure and Environment Ltd.
MEP Engineers	Waterman Building Services Ltd
Planning Consultant	Jones Lang LaSalle (JLL)
Environmental Impact Assessment	Waterman Infrastructure and Environment Ltd.
Landscape Architect	BCA Landscape
Transport Consultant	Waterman Infrastructure and Environment Ltd.
Sustainability	Waterman Building Services Ltd
Air Quality Consultant	Waterman Infrastructure and Environment Ltd.
Acoustic Consultant	Waterman Infrastructure and Environment Ltd.
Waste Consultant	Waterman Building Services Ltd

2. The Site and the Development

The Sevington Inland Border Facility (IBF), referred to as the 'Site' or 'Development', is located on the southeastern edge of Ashford, Kent, spans approximately 48 ha and is strategically positioned adjacent to Junction 10A of the M20 motorway. The site serves as a critical customs and border inspection hub, supporting freight movements to and from the Channel crossings. Its infrastructure includes hardstanding areas, inspection zones, administrative buildings, and landscaped buffer zones to mitigate visual and environmental impacts.

Figure 1: Site Location



The Development includes the existing operational infrastructure, designed to facilitate efficient border operations. The facility includes goods vehicle parking and staff car parking spaces to accommodate the workforce. The site hosts a range of border-checking facilities, ensuring compliance with customs and security regulations. Essential infrastructure features include security fencing**,** noise attenuation bunds and fences**,** CCTV, and strategically placed lighting columns to enhance operational safety and visibility.

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[1] 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 planning description[2] for the existing facility is as follows:

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[1] 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 (accessed 21 January 2025).
[2] Department for Levelling Up, Housing & Communities letter titled *"The Town and Country Planning (Border Facilities and Infrastructure) (EU Exit) (England) Special Development Order 2020 ("the Order")"* dated 28 April 2022.

"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 Covid19 testing and facilities. The proposed development includes the laying out of up to 855 Goods Vehicle parking spaces, capacity for 260 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 34,500m^2, (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 870m^2 associated with the Defra facility, water tank and pump house for sprinkler system, FM cabins, additional storage and additional Defra ancillary infrastructure, 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 works, Site preparation works and extensive hard and soft landscape works. Approval is also sought for additional Site wide ancillary infrastructure covering a maximum development area of 500m^2, (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."

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."

Existing buildings on-site will not change. The buildings are limited to the northern central (BCP) and south-western (IBF) parts of the application Site.

3. Planning Policies for Sustainable Design

A desk-based review of national, regional, and local planning policies has been undertaken, to identify the Sustainability Policy Framework for the Development. This section provides an overview of the planning policies that are relevant to the Development and the Site.

3.1 National Planning Policies and Legislation

3.1.1 National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF), revised in December 2024, sets out the Government's planning policies for England, focusing on sustainable development. It emphasises a balanced approach to economic growth, environmental preservation, and social well-being. Central to the framework is the presumption in favour of sustainable development, encouraging local authorities to pursue opportunities that enhance economic, social, and environmental conditions. Locally prepared plans are key to meeting housing and infrastructure needs whilst protecting the natural and built environment.

The NPPF highlights the importance of integrating community engagement, climate change mitigation, and biodiversity into planning processes. It requires plans to address local needs while aligning with national sustainability goals. The framework ensures that development supports long-term sustainability, adaptability, and quality of life across England.

New development should be planned for in ways that:

- New developments should prioritise sustainable practices, supporting reductions in greenhouse gas emissions and climate adaptation
- Developments should maximise the use of brownfield land and encourage effective land utilisation, balancing environmental, social, and economic factors
- Adherence to masterplans, design guides, and codes is required to maintain community standards
- Development plans should prioritise pedestrian and cycle-friendly layouts and support public transport integration
- Measures to conserve and enhance biodiversity are mandated, with integration of nature recovery strategies
- Consideration of long-term climate risks, with mitigation and adaptation measures like sustainable drainage systems
- Special provisions apply for renewable energy projects, emphasising their environmental benefits

Sustainable Development is achieved through the three pillars of sustainability integrated into the national planning framework:

Economic: Ensuring sufficient land is available for development, promoting innovation, and providing the necessary infrastructure for growth and productivity

Social: Supporting strong, vibrant, and healthy communities by providing a sufficient number of homes and fostering well-designed, safe places with accessible services and open spaces

Environmental: Protecting and enhancing the natural, built, and historic environment, including improving biodiversity, minimising waste, mitigating climate change, and promoting the prudent use of natural resources.

Refer to: National Planning Policy Framework (2024) for further details.

3.2 Local Planning Policies

3.2.1 Ashford Local Plan

The following guidance is from the Ashford Local development Plan adopted in February 2019. The Plan dedicates multiple policies relevant to Sustainable Design principles as follows:

- Policy SP1 - Strategic Objectives
- Policy SP6 - Promoting High Quality Design
- Policy TRA3 (b) - Parking Standards for Non-Residential Development
- Policy TRA4 - Promoting the Local Bus Network
- Policy TRA5 - Planning for Pedestrians
- Policy TRA6 - Provision for Cycling
- Policy TRA7 - The Road Network and Development
- Policy TRA8 - Travel Plans, Assessments and Statements
- Policy TRA9 - Planning for HGV Movement
- Policy ENV1 – Biodiversity
- Policy ENV4 – Light Pollution and Promoting Dark Skies
- Policy ENV5 – Protecting Important Rural Features
- Policy ENV6 – Flood Risk
- Policy ENV8 - Water Quality, Supply and Treatment
- Policy ENV9 - Sustainable Drainage
- Policy ENV10 - Renewable and Low Carbon Energy
- Policy ENV11 - Sustainable Design and Construction - Non-residential
- Policy ENV12 - Air Quality
- Policy ENV13 – Conservation and Enhancement of Heritage Assets

4. Sustainability Review of the Development

Sustainability aims to ensure a balanced relationship between the availability, conservation, and protection of natural resources against the need for human consumption and economic benefits. Recent history has demonstrated that there is an increasing disconnect between society's consumption of natural resources and the ability of our ecological and environmental systems to replenish themselves.

The Development is committed to delivering meaningful and measurable positive impacts—prioritising environmentally conscious strategies that reduce resource consumption, minimise carbon emissions, and foster resilience in the face of climate challenges.

The following sustainability priority themes for the Development have been identified:

- Design and Amenity;
- Energy;
- Sustainable Drainage and Flood risk;
- Sustainable Transport and Accessibility;
- Nature Conservation and Biodiversity;
- Waste;
- Pollution and Nuisance

4.1 Design and Amenity

'To create the highest quality design, which is sustainable, accessible, safe and promotes a positive sense of place through the design of the built form, the relationship of buildings with each other and the spaces around them, and which responds to the prevailing character of the area' – **Policy SP1 Strategic Objectives**

Table 2: Design

Relevant applicable policies	
Ashford Local Plan 2030	• Policy SP1 – Strategic Objectives • Policy ENV13 – Conservation and Enhancement of Heritage Assets
Objectives, requirements, and targets	
• Developments should be designed to be easy to use on foot and cater for cars and other vehicles, with the needs of vehicle users in mind and parking • Proposals should preserve or enhance heritage assets, maintaining their significance and contribution to local character and distinctiveness. •	

The Development layout prioritises efficient land use, strategic building orientation, and integrated green infrastructure. Buildings, including industrial units, office spaces, and welfare facilities, are set back for security whilst following a structured layout to optimise operational efficiency. The site incorporates a one-way traffic system for HGVs, minimising congestion and emissions, with separate access for employees. Sustainable drainage (SuDS) is a key feature, with six SuDS ponds positioned across the site to manage surface water naturally.

The existing landscaping at the Application Site will be enhanced to align with the requirements outlined in the approved Landscape and Ecological Management Plan (LEMP) associated with the IBF. These improvements will be implemented prior to the determination of this planning application.

The proposed landscape strategy aims to integrate the site seamlessly into its surroundings, complementing the LEMP proposals while enhancing biodiversity and habitat value where possible. The plans include native planting such as trees, thickets, and wildflower-rich grasslands to reflect the local landscape character. Additional planting along the northern boundary will enhance screening from nearby residential properties, while ornamental elements will improve aesthetics for pedestrians. Further tree planting around pond three in the southwest corner will provide screening for homes on Church Road, with careful consideration given to existing utilities.

The Development's material selection and construction approach prioritise sustainability by incorporating a mix of primary, secondary, and recycled aggregates and minerals, alongside responsibly sourced manufactured construction products. Buildings, cabins, fencing (including acoustic and security fencing), and lighting have been designed to minimise environmental impact whilst ensuring durability and functionality.

A key sustainability feature is the use of modular-style buildings for offices and inspection facilities, constructed with a carefully selected combination of materials that enhance energy efficiency, durability, and aesthetic integration within the site. Modular construction not only reduces material waste but also allows for flexibility, enabling the relocation or repurposing of structures in the future, therefore extending their lifecycle and reducing the need for new materials.

Additionally, the Development prioritises resource efficiency through responsible material sourcing, reducing embodied carbon, and promoting a circular economy approach.

As the site was originally constructed under the Special Development Order (SDO), BREEAM standards were not considered applicable at the time of construction, as the regulatory framework governing the project did not require assessment under this methodology. Given these circumstances, Policy ENV11 is not considered to apply retrospectively to the development.

4.1.1 Heritage

The Heritage Statement (Ref. 7) concludes that the project does not physically affect any designated or non-designated heritage assets. The only non-designated heritage asset within the site, the Royal Observer Corps underground monitoring post in Sevington, remains undisturbed as part of the development. Within a 500m radius of the site, there is one Grade II listed registered park and garden and one scheduled monument, neither of which will be impacted. However, 14 listed buildings exist within this area, of which eight have been assessed due to their proximity to the site. Additionally, the Grade I listed Church of St John the Baptist, located 1.5km southeast of the site, has been included in the assessment due to its visual and historical connection with the Church of St Mary within the search area.

Under the NPPF (2024) guidelines, the assessment concludes that the development would result in 'less than substantial harm' to one Grade I listed building at a moderate level and six Grade II listed buildings. In line with paragraph 215 of the NPPF, this harm must be weighed against the public benefits of the proposal, including its role in securing the optimum viable use of the IBF. The assessment also concludes that there will be 'no harm' to one Grade I listed building and one Grade II listed building within the search area.

Furthermore, the Archaeological Statement (Ref. 3) confirms that the development does not physically affect any designated or non-designated archaeological assets. The only non-designated heritage asset within the site, the Royal Observer Corps underground monitoring post, remains in situ without harm. The scheduled monument within the wider 500m area is also unaffected. Prior to the temporary IBF's construction, an archaeological mitigation program, including fieldwork and ongoing post-excavation reporting, was conducted. As a result, the development will have no impact on archaeological assets within or around the site.

4.2 Energy

'A positive approach to adapting to and mitigating against the effects of climate change will be secured by promoting sustainable transport, sustainable energy technologies, and encouraging sustainable building design' – **The Vision, Ashford Local Plan**

Table 3: Energy

Relevant applicable policies	
Ashford Local Plan 2030	• Policy ENV10 – Renewable and Low Carbon Energy • Policy ENV11 – Sustainable Design and Construction
Objectives, requirements, and targets	
• New developments should adopt a proactive approach to promoting energy from renewable and low carbon sources; • Promoting a development that minimises natural resource and energy use, ensuring an energy-efficient and environmentally responsible design.	

The Energy Strategy (Ref. 5) for the Development prioritises enhancing energy efficiency and sustainability, ensuring compliance with national energy policies and building regulations. The strategy incorporates a combination of passive and active design measures to optimise energy performance, reduce carbon emissions, and support long-term sustainability.

The heating, ventilation, and air conditioning (HVAC) strategy incorporates Mechanical Ventilation with Heat Recovery (MVHR) to minimise ventilation losses while maintaining indoor air quality. Additionally, Variable Refrigerant Flow (VRF) systems provide efficient heating and cooling solutions across the office spaces, while natural ventilation is utilised where feasible. The facility also features Air Source Heat Pumps (ASHPs) for space heating and hot water, supporting a fully electric heating approach. In corridors and security cabins, electric oil heaters are used as supplementary heating solutions.

Lighting throughout the facility is 100% LED, ensuring high energy efficiency and reduced consumption. Occupant sensors and Passive Infrared (PIR) detectors are installed in offices and circulation areas to prevent unnecessary energy use. The domestic hot water system is fully electric, with under-sink heaters in office spaces and unvented hot water cylinders for operational areas.

Overall, the energy strategy ensures the facility meets Building Regulations Part L (2013) standards (applicable at the time of construction) and aligns with national climate policies.

The tables below provide a summary of the building energy demand and consumption, alongside total carbon emissions.

Table 4: Summary of Building's CO2 Emissions

The calculated CO2 Emission Rate against the Target CO2 Emission Rate (Kg/co2/m2.annum)	
CO_2 emission rate from the notional building, $kgCO_2/m^2.annum$	34.2
Target CO_2 emission rate (TER), $kgCO_2/m^2.annum$	34.2
Building CO_2 emission rate (BER), $kgCO_2/m^2.annum$	34.2
Compliance with Building Regulations Part L 2013	Yes

4.3 Sustainable Drainage and Flood Risk

'Encourage the design of new buildings that minimise the need for energy and water consumption, use renewable energy sources, provide for sustainable drainage, support water re-use and incorporate facilities to enable recycling of waste and resources.' – **Policy SP6 Promoting High Quality Design**

Table 5: Sustainable Drainage and Flood Risk

Relevant applicable policies	
Ashford Local Plan 2030	• Policy SP6 – Promoting High Quality Design • Policy ENV6 – Flood Risk • Policy ENV8 – Water Quality, Supply and Treatment • Policy ENV9 – Sustainable Drainage • Policy ENV11 – Sustainable Design and Construction
Objectives, requirements, and targets	
• The use of sustainable drainage to retain groundwater and for the long-term resilience of water supplies; • New developments must ensure that there are no direct or indirect adverse effects on the quality of water sources in the borough • Lower runoff flow rates, reducing the impact of urbanisation on flooding; • Achieve 4 l/s/ha runoff or seek to achieve 50% reduction of existing peak runoff rates for the site; • Demonstrate that the first 5mm of any rainfall event can be accommodated and disposed of on-site;	

4.3.1 Flood Risk

The Flood Risk Assessment (Ref. 6) for the Development confirms that the Site is situated entirely within Flood Zone 1, demonstrating a 'low' probability of fluvial flooding in accordance with the Environment Agency's classification. Additionally, national mapping provided by the Environment Agency indicates that the risk of surface water flooding at the Site is also minimal. Comprehensive analysis of other potential sources of flooding, such as groundwater, sewer systems, and artificial water bodies, has been undertaken as part of the assessment, and no significant risks have been identified that would necessitate mitigation measures.

4.3.2 Sustainable Drainage

The Drainage Strategy for the Development currently incorporates a sustainable approach to manage surface water run-off. Run-off from the Site discharge into the Old Mill Stream located to the north and into two culverts that pass beneath the HS1 (High-Speed) railway line to the south. These discharges will be carefully controlled to maintain greenfield run-off rates, ensuring that the natural hydrological conditions of the area are preserved. The drainage system has been designed to effectively manage storm events up to and including the 1 in 100-year return period, with an added 40% contingency allowance to account for the impacts of climate change. The Development demonstrates that the first 5mm of any rainfall event can be accommodated and disposed of on-site through a combination of permeable surfaces, attenuation storage, and controlled discharge mechanisms that allow for the gradual infiltration or evaporation of initial rainfall before run-off occurs.

No changes are being proposed to the existing drainage strategy currently implemented on site.

Foul waste from the welfare facilities and Defra Border Control Post (BCP) is managed through the foul drainage system outlined in the 2022 SDO application's FRA and Drainage Strategy. The BCP has its own below-ground drainage system for wastewater from live animals, plants, and produce, with washdown water from inspection bays drained into a separate effluent tank for contaminant testing. The effluent is then tankered off-site, outside the Stodmarsh Catchment area.

The BCP foul water discharge from the offices and inspection facilities makes up 60% of the total estimated foul water output across the site, with the remaining 40% coming from the HMRC and DfT office buildings.

Sewage from the HMRC offices passes through a 65,000-litre southern HMRC tank before being pumped into the site-wide network at a rate of 4 l/s. The BCP has two separate foul water networks—one for sewage and another for trade effluent. The system is designed so that sewage from the DEFRA BCP office block flows directly into the site-wide network at an unregulated rate of 0.58 litres per second, where it merges with sewage from the HMRC and DfT offices before being discharged by gravity into the SW sewer.

4.4 Sustainable Transport and Accessibility

'To promote access to a wide choice of easy to use forms of sustainable transport modes including bus, train, cycling and walking to encourage as much non-car based travel as possible and to promote healthier lifestyles.' – **Policy SP1 Strategic Objectives**

Table 6: Sustainable Transport and Accessibility

Relevant applicable policies	
Ashford Local Plan 2030	• Policy SP1 – Strategic Objectives • Policy TRA3(b) – Parking Standards for Non Residential Development • Policy TRA4 – Promoting the Local Bus Network • Policy TRA5 – Planning for Pedestrians • Policy TRA6 – Provision for Cycling • Policy TRA7 – The Road Network and Development • Policy TRA8 – Travel Plans, Assessments and Statements • Policy TRA9 – Planning for HGV Movement
National Planning Policy Framework (NPPF) 2024	• Paragraph 109 – Promoting Sustainable Transport
Objectives, requirements, and targets	
• Promote access to a wide choice of easy to use forms of sustainable transport modes and to promote healthier lifestyles; • Provide a level of parking proportionate to its activity, and be agreed with the Local Highway authority and the Council; • Incorporate safe, attractive cycle routes connected to the Borough-wide network, provide adequate cycle parking, and enhance walking and cycling connections with existing routes; • Demonstrate that traffic movements to and from the development can be accommodated, resolved, or mitigated to avoid severe cumulative residual impacts; • Adequate HGV parking spaces are provided to appropriately meet the anticipated level of demand	

The Development's parking facilities align with Ashford Local Policy by supporting sustainable transport and efficient logistics.

- **Employee Parking:** 357 car spaces in the northwest (via Church Road), 3 EV charging points and disabled spaces.
- **Cycle Parking:** 60 secure cycle spaces are provided on Site to encourage active travel.
- **HGV Parking:** comprising:
    - Defra BCP parking and overflow parking
    - HMRC IBF parking and waiting area.
    - Swim lanes for both BCP and IBF vehicles
    - Two overflow HGV car parks ('Romeo' in the north, 'Tango' in the south).
- **Refrigerated Vehicle Support:** 24 refrigerated semi-trailers near the Defra BCP sheds and EV charging points for refrigerated vehicles.

These provisions promote reduction of emissions and encouraging multimodal transport.

The Transport Assessment (Ref. 11) ensures that the Sevington Inland Border Facility supports efficient transport connections, reduce congestion, and integrate sustainable travel options.

Adequate parking provisions are in place for both staff and HGVs, ensuring that on-site facilities meet operational demand without affecting public roads. The Staff Travel Plan (STP) promotes sustainable travel, including daily shuttle bus services to Ashford town centre and Ashford International rail station.

Pedestrian access is prioritised with safe movement routes and enhancements to Public Rights of Way (PRoW). The site also includes cycle parking to encourage cycling as a viable transport option for staff.

The development integrates well with the primary and secondary road networks. A Traffic Management Plan (TMP) and Site Signage Strategy are in place to direct HGV movements along suitable routes, reducing congestion and improving safety.

4.5 Nature Conservation and Biodiversity

'To conserve and enhance the Borough's natural environment including designated and undesignated landscapes and biodiversity and promote a connected green infrastructure network that plays a role in managing flood risk, delivers net gains in biodiversity and improves access to nature.' – **Policy SP1 Strategic Objectives**

Table 7: Nature Conservation and Biodiversity

Relevant applicable policies	
Ashford Local Plan 2030	• Policy ENV1 – Biodiversity • Policy ENV5 – Protecting Important Rural Features
Objectives, requirements, and targets	
• Include measures to retain, conserve and enhance habitats, including BAP (Priority) habitats, and networks of ecological interest • Avoid significant harm to locally identified biodiversity assets	

The Ecological Survey (Ref. 4) evaluates the environmental impacts of continued operations on biodiversity and habitat sustainability. Key ecological features identified include habitats for amphibians, bats, reptiles, water voles, and breeding birds. Whilst the development does not directly impact international or national designated ecological sites, concerns over habitat destruction, pollution, and wildlife disturbance have been addressed through sustainable management strategies. These strategies include habitat retention, installation of bat and bird boxes, and the continuation of a Landscape and Ecological Management Plan (LEMP) for five additional years. Monitoring programs for species and habitat health are implemented, with biodiversity enhancements such as improved wildlife corridors and sustainable drainage systems. The study concludes that with these measures, the IBF's operational effects does not significantly impact local biodiversity, and residual effects could be beneficial at the site level.

The Arboricultural Impact Assessment (AIA) (Ref. 2) has been prepared to support the full planning application for the continued use of the site. Given the site's current operational status, no additional tree protection measures will be necessary to facilitate the application. The assessment has considered the existing conditions and operations, and it has been determined that the proposed continued use will not require further intervention or modifications to protect the trees on-site.

4.6 Waste

"New development should include detailed consideration of waste arising from the occupation of the development including consideration of how waste will be stored, collected and managed." **– Policy CSW 3, Kent Minerals and Waste Local Plan 2013-30**

Table 8: Waste

Relevant applicable policies	
Ashford Local Plan 2030	• Policy SP6 – High Quality Design
Kent Minerals and Waste Local Plan 2013-30	• Policy CSW 3 – Waste Reduction
Objectives, requirements, and targets	
• Incorporate facilities for recycling waste and resources. • Developments must consider waste storage, collection, and management, including separate storage for recyclables.	

The Operational Waste Management Strategy (OWMS) (Ref. 10) for the Site outlines waste management practices across office spaces, staff facilities, and inspection activities. The Site Manager oversees waste storage, collection, and compliance with contractual targets, ensuring less than 5% of waste goes to landfill and at least 70% is recycled, with the remainder sent for energy recovery. Waste types include non-hazardous materials (e.g., recyclables, food waste, hygiene waste) and hazardous waste (e.g., spill kits, batteries, contaminated inspection waste). Specialist waste handling measures are in place, particularly for imported goods requiring inspection, which may be hazardous or pathogenic. The Port Health Authority (PHA) supervises the disposal of condemned goods, whilst animal-related and clinical waste are incinerated. Secure storage solutions (e.g., refrigerated units, leak-proof containers, secondary containment for hazardous materials) prevent contamination, disease spread, and environmental hazards. Waste compounds and storage areas undergo regular cleaning, and an emergency response plan is in place for spills or contamination incidents, with staff receiving ongoing training. Waste is collected at designated frequencies by private contractors, with hazardous waste being removed on an ad hoc basis and incinerated within five days at Thriplow Heath.

The waste management strategy supports reducing landfill reliance, prioritising recycling and energy recovery, ensuring proper hazardous waste containment, and minimising environmental risks through secure storage and scheduled collections. Efficient waste segregation and recycling contribute to resource conservation and climate change mitigation, aligning with sustainability principles and regulatory compliance.

4.7 Pollution and Nuisance

'To ensure new development is resilient to and mitigates against the effects of climate change by reducing vulnerability to flooding, promoting development that minimises natural resource and energy use, reduces pollution and incorporates sustainable construction practices, including water efficiency measures.' – **Policy SP1 Strategic Objectives**

Table 9: Pollution and Nuisance

Relevant applicable policies	
Ashford Local Plan 2030	• Policy ENV4 – Light Pollution and Promoting Dark Skies • Policy ENV12 – Air Quality
Objectives, requirements, and targets	
• Lighting should be minimal, directed downwards with a beam angle below 70 degrees, and does not cause significant adverse effects on the area's character, vehicle and pedestrian safety, or local biodiversity • The correlated colour temperature (CCT) of outdoor lighting should not exceed 3000 Kelvins • Promote a shift to the use of sustainable low emission transport to minimise the impact of vehicle emissions	

4.7.1 Air Quality

The Air Quality Assessment (Ref. 1) for the Development evaluates its impact on local air quality by analysing nitrogen dioxide (NO_2) and particulate matter (PM_{10} and $PM_{2.5}$) levels. Using established modelling techniques and baseline data from Ashford Borough Council, the study confirms that pollutant levels at sensitive receptor locations remain below national air quality standards. The assessment finds that operational traffic emissions result in negligible air quality effects, requiring no additional mitigation measures. This outcome ensures that the development does not degrade air quality, thus minimising risks of respiratory illnesses and environmental harm. The inclusion of sustainable design elements, such as cycle spaces, electric vehicle charging points, and green infrastructure, further enhances air quality and contributes to long-term environmental resilience.

4.7.2 Noise

The Noise and Vibration Assessment (Ref. 9) for the development evaluates the potential impacts on surrounding areas, focusing on operational noise. The primary sources of noise include road traffic, fixed external plant, and HGV movements within the site. Baseline noise levels were determined using 2022 traffic data and a 3D noise model, supported by a 2024 survey. The study finds that whilst daytime operational noise is negligible, night-time noise may cause minor adverse effects at certain receptors, particularly from HGV movements.

To mitigate potential noise impacts during night-time operations, the Development incorporates several measures aimed at reducing noise emissions and safeguarding community wellbeing. The site layout has been designed to strategically position noise-generating sources away from the most sensitive receptors, minimising direct exposure. Additionally, the use of electric hook-ups for refrigerated HGVs aims to reduce engine idling noise, and ongoing monitoring will help identify and address any emerging noise concerns.

The assessment follows national and local noise guidelines, ensuring compliance with sustainability principles by limiting excessive noise exposure. The incorporation of mitigation strategies supports environmental resilience and aligns with policies promoting sustainable development.

4.7.3 Light Pollution

The Lighting Strategy (Ref. 8) has been reviewed to enhance sustainability, reduce energy consumption, and prevent light pollution. The proposed strategy aims to minimise unnecessary light spill, ensuring compliance with guidelines that promote dark skies and protect the surrounding environment, wildlife, and local character. The key focus is to enhance the efficiency and effectiveness of external lighting while reducing adverse impacts on nearby residential areas and the wider nightscape.

One of the primary steps in this strategy is the installation of shields on selected external light fittings. These shields will act as physical barriers, effectively directing light downwards.. This measure will significantly reduce glare and unnecessary illumination of surrounding spaces, particularly in sensitive locations where excessive artificial light could disrupt biodiversity and alter the character of the area.

Additionally, the strategy incorporates adaptive lighting controls to ensure that light fittings operate only when required. This includes the use of photocells, remote switching, and time clocks to limit light dispersion, improving visibility in essential areas for pedestrian and vehicular safety, while preventing excessive illumination of adjacent properties, green spaces, or natural habitats.

Furthermore, while the strategy aims to reduce blue-light pollution, the current lighting installations predominantly operate at a correlated colour temperature (CCT) of 4000 Kelvins, rather than the recommended 3000K threshold. This aspect remains under review to assess potential future modifications that further enhance environmental compliance and minimise disruption to both human circadian rhythms and local wildlife.

5. Conclusion

The Development prioritises efficiency, sustainability, and environmental responsibility across all aspects of its design and operation. Key features such as sustainable drainage systems (SuDS), modular construction, and responsible material sourcing reflect a commitment to minimising environmental impact. Transport and parking provisions are aligned with local policies, promoting sustainable travel through electric vehicle (EV) charging points, cycle parking, and a staff travel plan. Additionally, waste management practices emphasise recycling and energy recovery, significantly reducing landfill reliance and ensuring compliance with sustainability regulations. The assessment of heritage and archaeological factors confirms that the development results in 'less than substantial harm' to nearby listed buildings, with public benefits outweighing any minor impacts.

The Development demonstrates a proactive approach to mitigating noise, air quality, and lighting concerns, ensuring minimal disruption to surrounding areas while maintaining a safe and efficient working environment.

Although the Development involves minimal works on-site, every opportunity will be taken to incorporate improvements in energy efficiency and a wide range of other sustainability features. The Development is committed to enhancing its environmental performance by integrating sustainable practices throughout its design and operation, ensuring that energy use is optimised, resources are managed responsibly, and environmental impacts are minimised. Through this, the development will contribute to long-term ecological benefits, support the transition to a low-carbon future, and align with broader sustainability goals while creating a positive impact on both the local community and the environment.

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