

2. EIA Methodology

Introduction

- 2.1. This chapter sets out the methodology for undertaking the EIA. In particular, it details the process of identifying environmental issues to be addressed and the method of assessing the likely significance of effects.

General Approach

- 2.2. This ES has been prepared to comply with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017¹, as amended², (the 'EIA Regulations') which implement the European Council Directive No. 2014/52/EU³. Reference has also been made to currently available EIA good practice guidance, including:
- Guidance documents produced by the European Commission, which are available at: <http://ec.europa.eu/environment/eia/eia-support.htm>;
 - Guidance documents/advice notes prepared by the Planning Inspectorate (PINS), which are available at: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/guidance/>;
 - National Planning Practice Guidance (PPG) on Environmental Impact Assessment, Department of Levelling Up, Housing Communities (DLUHC) (updated May 2020)⁴;
 - 'Guidelines for Environmental Impact Assessment', IEMA, 2004⁵, updated 2006⁶;
 - 'EIA Quality Mark - ES Review Criteria COM 3-6', IEMA 2021⁷;
 - 'The State of Environmental Impact Assessment Practice in the UK, IEMA, 2011⁸;
 - 'Environmental Impact Assessment Guide to Delivering Quality Development', IEMA, 2016⁹;
 - 'Delivering Proportionate EIA', IEMA, 2017¹⁰;
 - Impact Assessment Outlook Journal: Volume 1: 'Perspectives upon Proportionate EIA', IEMA, 2018¹¹; and
 - Topic-specific guidance, detailed where appropriate in the relevant technical chapters.
- 2.3. The planning policy context which has informed the EIA includes the following:
- National Planning Policy Framework (NPPF)¹².
 - Planning Practice Guidance (PPG)¹³.
 - Ashford Local Plan¹⁴.
 - Kent Minerals and Waste Local Plan, as amended by the Early Partial Review (2020) ('Minerals and Waste Local Plan')¹⁵.
 - Landscape Character Supplementary Planning Document (SPD) Supplementary Planning Guidance¹⁶.
 - Sustainable Drainage (SuDs) SPD¹⁷.
 - Dark Skies SPD¹⁸.
- 2.4. In line with the EIA Regulations and best practice guidance, the EIA comprised the following:
- Scoping - to set out the intended scope of the EIA;
 - Site surveys, data searches and desk-top reviews to establish the pre-development baseline conditions and predict the likely future baseline conditions in the absence of the Development;
 - Identification of sensitive receptors which could be affected by the Development (including potential future receptors introduced as part of the Development);

- Undertaking technical assessments to determine the likely significant effects of the Development;
 - Developing mitigation measures;
 - Determining whether monitoring of mitigation will be necessary;
 - Assessing the residual effects of the Development and their significance; and
 - Assessing the cumulative effects of the Development.
- 2.5. A detailed planning application will be submitted to the Planning Inspectorate (PINS) for Crown Development in accordance with section 70 of the EIA Regulations.

Screening

- 2.6. Screening is the first stage of the EIA process which determines whether a Development is likely to have any significant effects, and therefore whether EIA is required. As set out in the EIA Regulations, the determination of whether EIA is required is dependent on whether the Development is:
- Schedule 1 development: in which case EIA is required; or
 - Schedule 2 development: in which case EIA is required where the development is likely to have significant effects on the environment, as referenced in Schedule 3 of the Regulations.

The Development falls within ‘Schedule 2’ of the EIA Regulations under Category 10(b) (urban development projects). A formal EIA Screening Opinion was not requested from ABC because it was considered by the Applicant that an EIA should be carried out for a development of this scale, due to the potential for likely significant environmental effects based on factors such as its nature, size and location.

Scoping

- 2.7. The EIA Regulations determine that the ES should focus on the ‘*likely significant effects of a Development on the environment*’. Although discretionary rather than mandatory, scoping is an important component of the EIA process as it provides a mechanism to focus the ES, with the agreement of third-party consultees, on likely significant effects, thus avoiding disproportionate emphasis upon peripheral issues which are unlikely to be significant. As the Institute of Environmental Management and Assessment (IEMA) state:

“... At its best, EIA helps to shape the design and siting of development such that social value to communities and broader economic value to investors can both be met, without eroding natural capital and pushing boundaries of environmental limits - a tool that can truly support moves towards sustainability. However, the many competing demands can often serve to stifle the process, resulting in reams of information that mask the key environmental issues that need to be considered...” ¹⁹.

- 2.8. Scoping is also important in identifying all the potentially significant effects for the continued operation of the Development to ensure that appropriate mitigation options are considered.

EIA Strategy

- 2.9. Given the IBF is built and operational, and that the planning application is for the continued use of the IBF for the foreseeable future, an EIA Strategy was prepared by Waterman, setting out the planning history at the Application Site, together with the approach to baseline and the assessment of effects. The EIA Strategy was submitted to ABC on 4 September 2024, see Appendix 1 of [Appendix 2.1](#). This was followed by a meeting with ABC and Temple Group, who

were appointed to undertake an independent review of the Scoping Request Report and Environmental Statement on behalf of ABC.

Request for a Scoping Opinion

- 2.10. In line with best practice guidance, scoping was undertaken at the start of the assessment process to identify the environmental issues to be addressed in the ES. A 'Request for a Scoping Opinion' under Regulation 15(1) of the EIA Regulations was prepared by Waterman and submitted to ABC on 31 October 2024. The Request for a Scoping Opinion is included as **Appendix 2.1**.
- 2.11. The Request for a Scoping Opinion set out the overall approach to the EIA and identified the likely environmental effects that may arise from the Development. The proposed scope of the assessments was guided by existing available information, provided by the Applicant, and desk top analysis.

Submission of Additional Information

- 2.12. On the basis of Temple Group's initial review, additional environmental information was submitted to provide further evidence to provide further clarification and to agree the list of potential cumulative schemes, this is provided in **Appendix 2.2**.

ABC's Scoping Opinion

- 2.13. Following consultation with statutory consultees, and the findings of the independent review by Temple Group, a Scoping Opinion was received from ABC on 19 December 2024 (ABC Ref. OTH/2024/2051) (a copy of these responses is presented in **Appendix 2.3**). Together, the Request for a Scoping Opinion and ABC's Scoping Opinion confirmed that the following key environmental issues should be addressed as part of the EIA:
- Socio Economics (**ES Volume 1, Chapter 6**);
 - Transport and Access (**ES Volume 1, Chapter 7**);
 - Air Quality (**ES Volume 1, Chapter 8**);
 - Noise and Vibration (**ES Volume 1, Chapter 9**);
 - Cultural Heritage (**ES Volume 1, Chapter 10**);
 - Ecology and Biodiversity (**ES Volume 1, Chapter 11**);
 - Landscape and Visual Impact Assessment (**ES Volume 3**)
- 2.14. The specific assessment scopes for those topics 'scoped in' to the EIA are outlined in the respective technical chapters of the ES (**Chapters 6 to 11** and **ES Volume 3**). These reflect the content of the Request for a Scoping Opinion, subject to any comments or specific requirements detailed in ABC's Scoping Opinion.
- 2.15. ABC's Scoping Opinion confirmed that the following topics could be 'scoped out' of the EIA:
- Assessment of Construction Effects.
 - Human Health
 - Ground Conditions and Contamination.
 - Agriculture and Soils.
 - Climate Change.
 - Daylight, Sunlight and Overshadowing and Solar Glare.
 - Light Pollution.

- Risk(s) of Major Accidents and / or Disasters.
- Waste.
- Wind Microclimate.
- Flood Risk and Drainage.

Response to Scoping Opinion

- 2.16. A summary of the key issues that arising from the scoping process, as relevant to the EIA as a whole, is presented in **Table 2.1**, together with an indication of how these issues have been addressed in the ES. Summaries of those issues relevant to the technical disciplines and how those issues have been addressed are provided in technical **Chapters 6 to 11** and **Volume 3**.

Table 2.1: Key Issues Raised in ABC's Scoping Opinion

Key Issues Raised in the Scoping Opinion	Response	ES Reference
The Applicant should include a summary of the identified construction effects within the body of the ES and signpost where in the appendices these reports can be found. (para 3.3.2)	A summary is provided within each of the technical ES chapters.	Chapters 6 - 11 and ES Volume 3 .
The ES should consider how the environmental baseline would have been likely to evolve if the Development did not proceed. (para 4.2.5)	Chapter 5 (Alternatives) considers a Do Nothing / No Development scenario for the Application Site. Furthermore, each technical ES chapter sets out the evolution / future baseline in the absence of the Development.	Chapter 5 and Chapters 6 - 11 and ES Volume 3 .
Include a reference list that clearly states which documents / figures / drawings have been relied upon for the description and assessment included in the ES, and where these are located. It should also be confirmed which items are for approval or for information only. (para 4.2.7)	The description of the Development provides an overview of the proposals to be assessed, with the source of the information being clearly stated. Sources used in the assessment be the technical topics are clearly set out in the list of references at the end of each ES chapter.	Chapter 4 and Chapters 6 - 11 and ES Volume 3 .
A list of all sensitive receptors is provided. (para 4.2.9)	A list of sensitive receptors has been compiled based on the receptors set out in each of the technical ES chapters.	Table 3.1 within Chapter 3 .
The ES should include statements of competence and experience for those team members responsible for each topic section. (para 4.4.2)	A list of individuals involved in the authoring and / or review of the ES (or its technical parts) has been provided.	Appendix 1.2
Committed development for which construction began in 2019 / 2020 should be included in the baseline conditions. This should also include schemes that have been approved post-2020 or is currently being considered in the planning system. (para 4.5.1)	A list of potential cumulative schemes was submitted to ABC with the Request for a Scoping Opinion (Appendix 2.1), and later updated following further consultation with ABC to identify schemes within 5km of the Application Site and to include those which did not have planning	Appendix 2.1 , Appendix 2.2 , and Appendix 2.3

Key Issues Raised in the Scoping Opinion	Response	ES Reference
The ES should consider schemes within a 5km radius of the Site. (para 4.5.2)	consent, but which ABC considered to be 'reasonably foreseeable'.	
The ES should include a comparison of environmental effects between the different iterations of the Development and, furthermore, justify changes to the Development that have come about as a result of environmental assessments. (para 4.6.2)	There is no information available with regard to previous iterations of the IBF (as part of the SDO), or whether there were any changes in its design in response to environmental assessments undertaken at the time.	ES Chapter 5 (Alternatives)
The ES should present a summary of mitigation measures (for all topics) and indicate whether the mitigation is embedded or additional, together with its means of being secured. (para 4.7.2)	Each topic chapter includes a section which summarises the likely mitigation measures.	ES Chapter 13 (Next Steps)
The ES should include the limitations and assumptions made throughout the EIA process including those for the construction and operational phase. (para 4.8.1)	There is a list of general limitations and assumptions which applies to the ES as a whole. Each of the technical ES chapters includes a list, specific to their discipline. Given that there is no proposed construction, assumption and limitations associated with those works are not covered.	Chapter 2 (below) and Chapters 6 - 11 and ES Volume 3.
For ease of reading, figures should be included within the text of the main volume of the ES and not in separate documents. (para 4.9.6)	The figures were to be presented as a separate volume (Volume 2) to the main ES. However, these will now be incorporated with the individual ES chapters. The Landscape and Visual Assessment will now form ES Volume 3.	All ES chapters (where relevant).

Insignificant Issues

- 2.17. As part of the EIA scoping process, it was agreed with ABC that the following would be unlikely to give rise to significant environmental impacts as a result of the Development. Accordingly, these themes are considered 'insignificant issues' and therefore are not considered further within this ES. They are, however, subject to technical assessment work that has been submitted alongside the planning application. A full list of these documents, under the heading **Other Planning Documentation**, is provided in **Chapter 1: Introduction**.
- 2.18. As noted in paragraph 2.15, ABC were satisfied that a number of topics could be scoped out of the EIA. In order to demonstrate that these topics have been considered appropriately, a commentary on each, including signposting of where relevant information is provided in the ES or other supporting documentation, is provided below.

Other Topics and Issues

- 2.19. Information regarding the following additional topics 'scoped out' of the EIA can be found elsewhere in the ES and / or in the planning application documents referenced below:
- Ground Conditions and Contamination – Preliminary Risk Assessment²⁰.

- Light Pollution – External Lighting Assessment²¹. Note that a description of lighting is provided in **Chapter 4: The Development** and the impact on views is provided in **Volume 3: Landscape and Visual Assessment**.
- Waste – Operational Waste Management Strategy²². Note that a description of the operational wastes and a summary of the management is provided in **Chapter 4: The Development**.
- Flood Risk and Drainage – Flood Risk Assessment²³.

Consultation

- 2.20. Consultation has been undertaken throughout the EIA process. The following statutory and non-statutory organisations were consulted regarding the Development throughout the EIA process either directly by the EIA team or through ABC as part of their consultations:
- Ashford Borough Council (ABC): Transport.
 - Kent County Council (KCC): Highways & Transportation; Public Rights of Way; Heritage Conservation; Ecology; Flood Authority; Minerals & Waste.
 - Environment Agency (EA).
 - Natural England.
 - Historic England.
 - National Highways.
 - Other utilities providers.
- 2.21. All comments from the consultees relating to the EIA that had been received at the time of submission of the planning application are addressed in the relevant technical chapters (**Chapters 6 to 11** inclusive and **Volume 3: Landscape and Visual Assessment**).
- 2.22. Copies of consultation responses received directly by the EIA consultant team can be found in appendices relevant to specific disciplines.

Public Consultation

- 2.23. A community engagement exercise was undertaken between 10 October 2024 and 2 November 2024 to publicise the full planning application and obtain feedback on the local community's experiences with living near Sevington IBF. This comprised:
- 2,438 flyers delivered to nearby residents, businesses and neighbours to the Application Site.
 - 55 letters to near neighbours, informing them of the door-knocking activities, with 23 conversations held.
 - 26 letters to political/ officer stakeholders at Borough, County, Parish and parliamentary level, plus local business/ community stakeholders invited to a meeting with the project team.
 - 23 conversations held with residents during door-knocking on 16 October and 17 October.
 - A dedicated community engagement website at [REDACTED] with an online mailing list for updates, which received 260 users and 51 subscribers.
 - Social media advertisement publicising the website, which received 40,332 impressions.
 - 73 attendees across two community engagement events on 19 October and 26 October.
 - A dedicated project email and telephone number, with 7 emails and 1 phone call received.
 - 4 stakeholder meetings.

- 2.24. A total of 12 responses were made to the engagement survey via physical/online/postal forms during this engagement period and these have been considered within the planning application where relevant.
- 2.25. A further round of community engagement took place in January 2025 to provide a summary of feedback received and an update on the full planning application. Using the same engagement tools as the first engagement exercise, two community events were held on 17 January 2025 and 18 January 2025, inviting the community to share their views ahead of the full planning application submission.
- 2.26. Further detail on the consultation process is provided in the **Statement of Community Involvement** prepared by Kanda and submitted as a document in support of the planning application.

Nature of the Planning Application and Approach to EIA

- 2.27. As outlined in **Chapter 1**, the Applicant is seeking full planning permission for the continued operation of the existing IBF by way of a detailed planning application submitted to the Planning Inspectorate (PINS) for Crown Development in accordance with section 70 of the EIA Regulations. The description of the Development within the ES must be sufficient to enable the requirements of the EIA Regulations to be fulfilled and to enable the likely significant effects of the Development to be identified.
- 2.28. Given that the IBF is built and operational, the Development is defined by the quantum of the existing built form and floor area schedule, together with the massing, layout, articulation and architectural details shown in the detailed planning application drawings submitted for approval. These drawings, together with the detailed description of the Development presented in **Chapter 4: The Development** have formed the basis for the EIA.

Approach to Assessment & Reporting Structure of Technical Chapters

- 2.29. Environmental topics to be considered in the EIA have been assigned separate chapters within this **ES Volume 1 (Chapter 6 to Chapter 11 inclusive)**. An overview of the chapter framework, along with the broad approach to assessment contained within each technical chapter, is set out in further detail below.
- 2.30. The Landscape and Visual Assessment (LVIA) is presented within a separate volume (**ES Volume 3**) but follows a similar structure to that of the ES chapters, as detailed below.

Introduction

- 2.31. This section provides a brief introduction to the assessment and the issues considered in the chapter. It confirms the author and highlights relevant figures and appendices which accompany the chapter (figures are presented at the end of each ES chapter, and appendices in **ES Volume 2**).

Legislation, Planning Policy and Guidance

- 2.32. This section provides a bulleted list of relevant legislation, planning policy and guidance in relation to the specific technical topic. More information, where necessary, is provided in the appendices which support the technical chapters.

Assessment Methodology and Significance Criteria

- 2.33. This section sets out the methods used in undertaking the technical assessment, including the definition of an appropriate study area, the approach to baseline data collection and any consultations undertaken with ABC officers or other third parties. It also provides an explanation

of the approach to evaluating the significance of likely environmental effects with reference to published standards / guidelines, best practice and industry criteria. Any limitations and assumptions of the assessment are also outlined.

- 2.34. Where it has not been possible to quantify effects, qualitative assessments have been carried out, based on available knowledge and professional judgement. Where uncertainty exists, this has been noted in the relevant assessment chapter.
- 2.35. The significance of effects is generally determined by considering the magnitude of impact against the sensitivity of a receptor:
- **Sensitivity of Receptor:** Receptors are defined as the physical resources or user groups that are subject to impacts. Receptor sensitivity (referred to in some topics as 'value') may depend on factors such as: rarity; quality; importance; and / or replaceability etc.
 - **Magnitude of Impact:** This represents the degree of change to which a receptor will be exposed as a result of the construction or operational activity undertaken.
- 2.36. The methodology for determining receptor sensitivity and impact magnitude is specific to each technical topic and is defined in each technical chapter. Where industry guidance dictates a variation to this approach (e.g. the Chartered Institute of Ecology & Environmental Management (CIEEM) guidelines²⁴ for ecological impact assessment), this will be explained in the relevant chapter.
- 2.37. The outcome of an impact on a receptor is referred to as an 'effect'. Criteria for ascribing the significance to effects, having regard to both receptor sensitivity and impact magnitude, are set out in each technical chapter and adhere to the following general scale (unless otherwise stated to accord with industry guidance):
- **Major adverse / beneficial;**
 - **Moderate adverse / beneficial;**
 - **Minor adverse / beneficial;**
 - **Negligible.**
- 2.38. Each technical chapter also sets out which effects are considered as 'significant' for the purposes of the EIA, with reference to their technical guidelines.

Baseline Conditions

- 2.39. In order to assess the likely significant effects of the Development, it is necessary to establish the environmental conditions and sensitive receptors that exist on, and surrounding, the Application Site in the absence of the Development. These are known as baseline conditions.
- 2.40. In most cases, the baseline conditions have been taken as the existing conditions when surveys were undertaken, or when latest relevant baseline data were available. The IBF has been constructed and is currently in operation (with current planning permission due to expire in December 2025). This means a current day baseline would not be appropriate. Instead, a 'pre-development' baseline has been identified as before the Development was built for the Application Site (2020), with the implementation of Phase 1A of the Reserved Matters Application (Ref. 19/00579/AS), as described in the Planning History section of **Chapter 1: Introduction**. Where appropriate to do so, the basis for the baseline conditions for the pre-development Application Site have utilised information and data from the 2020 SDO.
- 2.41. The baseline conditions relevant to each environmental issue are summarised in this section of each chapter, drawing upon the analysis of the Phase 1A of the Reserved Matters Application and SDO data along with evaluating outcomes of desk-top studies, evidence reviews and the results

of site surveys. Full information is given in the appendices contained in **ES Volume 2**, which are appropriately cross-referenced in each relevant chapter.

- 2.42. Consideration is also given, as appropriate to the technical topic, to the way in which the baseline may evolve, as a result of natural changes, in the absence of the Development, as required by Schedule 4(3) of the EIA Regulations. Consideration is also given to the likely future baseline, having regard to proposed changes within the vicinity of the Application Site as a result of other consented schemes and any other proposed interventions.
- 2.43. The description of baseline and future baseline conditions will include a review of the existing and future sensitive receptors, which have the potential to be affected by the Development and their sensitivity.

Likely Significant Effects

- 2.44. This section of each chapter presents the assessment of the likely significant effects of the Development during its continued operation.
- 2.45. Likely significant environmental effects have been assessed based on environmental knowledge of the pre-development Application Site and the existing surrounding area (the baseline conditions). The EIA has considered both the beneficial and adverse effects of the Development as a result of its continued operation. As there is no time horizon associated with the Development, no consideration has been given to decommissioning within the assessment.
- 2.46. In line with Schedule 4(5) of the EIA Regulations “... *the description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term, and long-term, permanent and temporary, positive and negative effects of the development...*”. As such, in line with regulatory and best practice requirements, effects are assigned the following descriptors to determine the nature, temporal scale, permanence, type and spatial scale of the effect. A summary of the approach to defining these descriptors is set out in **Table 2.2**.

Table 2.2: Effect Typologies and Descriptors

Effect Typology	Effect Descriptor	Definition
Nature of Effect	Direct (Primary)	An effect without intervening factors (e.g. noise associated with the movement of HGVs around the Application Site).
	Indirect (Secondary)	An effect not directly caused by the Development.
Temporal Scale of Effect	Short-Term	An effect lasting up to ~3 years from the commencement of the Development.
	Medium-Term	An effect lasting between ~3 and ~15 years from the commencement of the Development.
	Long-Term	An effect lasting from ~15 years onwards from the commencement of the Development.
Permanence of Effect	Temporary	An effect lasting only for a limited period of time (e.g. the lighting effects upon visual amenity).
	Permanent	An effect lasting or remaining unchanged for the operational lifetime (e.g. the creation of operational jobs as a result of the Development, or the generation of noise or air quality emissions from operational traffic flows).

Effect Typology	Effect Descriptor	Definition
Type of Effect	Adverse (i.e. Negative)	A harmful or unfavourable effect (e.g. lighting on the Development causing disturbance for roosting bats adjacent to the scheme).
	Beneficial (i.e. Positive)	A favourable or advantageous effect (e.g. the creation of new habitat by planting trees on the site).
Spatial Scale of Effect	Site	Effects experienced within and immediately adjacent to the Application Site.
	Neighbourhood	Effects experienced in the wider vicinity of the Application Site (e.g. within 500m of Application Site).
	Local	Effects experienced within the ABC area.
	Regional	Effects experienced within the broad geographic area of Ashford e.g. Kent, South-East.
	National	Effects experienced in England or wider UK
Cumulation of Effects	Cumulative	Effects increasing by one addition after another (e.g. traffic generated by a number of different developments occurring in close proximity to one another).

- 2.47. Part 10 of the EIA Regulations requires consideration of transboundary effects. These may arise where development proposed to be carried out in England which is the subject of an EIA application is likely to have significant effects on the environment in a European Economic Area (EEA) State. No transboundary effects are envisaged as a result of the Development and this issue is not considered relevant to this EIA.

Mitigation Measures and Likely Residual Effects

- 2.48. This section outlines any mitigation measures that are required during the operational phase, beyond those that are already 'built in' to the Development (inherent mitigation) and which are therefore included in the pre-mitigation assessment of the likely significant effects.
- 2.49. Following completion of the technical assessments within the EIA, which have regard to the inherent mitigation measures defined above, methods of avoiding, reducing or off-setting any resultant likely significant adverse effects (or ways of enhancing beneficial effects) have been identified. These 'additional' mitigation or enhancement measures are described in each technical chapter of the ES.
- 2.50. Following identification of the additional mitigation and / or enhancement measures, each technical chapter identifies any residual significant effects likely to remain following mitigation. Likewise, if it is not possible to mitigate or enhance an effect, then its unmitigated / unenhanced effect is re-stated as a residual effect. **Chapter 12: Residual Effects & Effect Interactions** provides a combined summary from each of the technical chapters.

Monitoring

- 2.51. In compliance with Schedule 4(7) of the EIA Regulations, post mitigation monitoring of environmental conditions has been proposed, where relevant, within the technical chapters and is summarised in **Chapter 13: Next Steps**.

Cumulative Effects

- 2.52. The EIA Regulations require 'cumulative' effects to be considered within an ES. There is no prescribed guidance relating to the assessment of cumulative effects; however, reference has been made to the 'Guidelines for the Assessment of Indirect and Cumulative Effects as well as Impact Interactions' published in 1999 by the European Commission (EC)²⁵. The EC Guidelines give advice on how to approach cumulative assessments during the EIA process and how to adapt the approach to different circumstances. They also suggest tools for identifying and assessing indirect and cumulative effects as well as impact interactions.
- 2.53. There are no agreed and accepted definitions, although the EC Guidelines mentioned above define cumulative effects as:
- "... those that result from incremental changes to an environment caused by past, present or reasonably foreseeable actions together with the project..."*
- 2.54. Impact interactions are defined as:
- "... the reactions between impacts whether between the impacts of just one project or between the impacts of other projects in the area..."*
- 2.55. In line with the requirements of the EIA Regulations, the ES has considered the cumulative effects and effect interactions of the Development. For the purposes of the ES, these are categorised into two types: Intra Development Effects and Inter Development Effects. These are discussed in more detail below.

Intra Development Effects

- 2.56. Intra Development Effects comprise the combined effects (or effect interactions) of individual effects resulting from the Development in isolation (for example noise, dust and visual effects) upon a particular receptor or receptors. Intra Development effects have been assessed drawing upon the findings of all the technical assessments included within this ES and applying professional judgement. The outcome of the Intra Development effects assessment is presented in **Chapter 12: Residual Effects & Effect Interactions**.

Inter Development Effects

- 2.57. Inter Development Effects comprise the combined effects of the Development with those of other consented or reasonably foreseeable schemes. These effects might individually be insignificant, but when considered together, could create a significant cumulative effect. Consideration of Inter Development Effects is in line with Schedule 4(5(e)) of the EIA Regulations, which requires a description of the likely significant effects resulting from *"... the cumulation of effects with other existing and / or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources..."*
- 2.58. Enquiries were made with ABC to identify schemes that were of a sufficient scale or sufficiently close to the Application Site that Inter Development Effects may occur. The following criteria were applied based on established good practice to identify the schemes for consideration with the Inter Development Effects assessment:
- Projects within 5km of the Application Site with:
 - a) valid planning permission (or that are considered, by ABC, to be 'reasonably foreseeable', i.e. anticipated to have planning consent by the time the application for the Development is determined); and
 - b) EIA Development; or

- c) non-residential floorspace uplift of greater than 10,000m² Gross External Area (GEA); or
- d) a residential yield of greater than 150 units; or
- e) a total site area of greater than 5ha; and
- f) New sensitive receptors near to the Application Site.

2.59. By applying the above criteria, and in consultation with ABC, the following schemes (hereafter referred to as 'the Cumulative Schemes') were identified for consideration within the Inter Development Effects Assessment. More detailed planning descriptions of the cumulative schemes are provided in **Appendix 2.4**. The locations of the cumulative schemes are shown on **Figure 2.1**.

Table 2.3: Schemes Proposed for Consideration within the Inter Development Effects Assessment

ID	Reference and Status	Site Name/Address	Distance (km)	Summary Planning Description
1	16/00125/AS Approved: 28/04/2016 - Development underway	Land south of Captains Wood, Land at Cheesemans Green Lane, Kingsnorth, Kent	0.98 (SW)	Construction of 326 new dwellings with associated access, parking, landscaped areas including a neighbourhood play area, internal roads for the development, details of distributor roads E and F, Waterbrook Link Road, a district play area north of Captain's Wood and surface water drainage measures.
2a	18/00098/AS Approved 17/04/2018 - Development underway	Waterbrook Park, Waterbrook Avenue, Sevington, Kent	0.1 (SW)	Hybrid planning application for mixed-use development comprising (1) application for full planning permission for the construction and operation of a 600-space truck stop; a 2,162 sqm GIA service building providing 1,734 sqm GIA of ancillary truck stop service facilities and 878 sqm GIA of B1 offices; buildings providing 6,308 sqm GIA B1 (b and c only), B2 and B8 floorspace for small and medium enterprises; associated access, parking and landscaping, including highway infrastructure works to Waterbrook Avenue and (2) Application for outline planning permission (with all matters reserved) for 8.9ha of employment uses comprising uses falling within use classes B1, B2 and B8, a class A1 superstore of up to 2,323 sqm, drive-through restaurants (use classes A3/A5), a petrol filling station and ancillary convenience store, and car showrooms (sui generis); and up to 400 residential dwellings, with class A1, A3 and A5 neighbourhood retail uses, associated drainage, parking, landscaping and infrastructure
2b	PA/2024/0260 Approved 09/10/2024 – Not Started	Waterbrook Park, Waterbrook Avenue, Sevington	0.75 (SW)	Mixed-use application comprising 144 dwellings, a convenience/farm shop/cafe building, wetland area, landscaping, open space, drainage, parking, and other associated infrastructure with access from Waterbrook Avenue
3	19/00025/AS Approved 21/05/2020 - Development underway	Land between railway line and, Willesborough Road, Kennington, Kent	2.9 (NW)	(i) Outline planning permission (all matters reserved except for points of access) for up to 437 dwellings; formal and informal open space incorporating SuDS; and associated services, infrastructure and groundworks; and (ii) full planning permission for the erection of 288 dwellings; the creation of serviced plot of land to facilitate the delivery by Kent County Council of a two-form entry primary school with associated outdoor space and vehicle parking; a new Bowls Centre including a clubhouse of 292 sq m, ancillary buildings and a bowling green; a local centre to provide 280 sq m of A1 (retail), 180 sq m of A1 (retail foodstore), 100 sqm A3 (café), 75 sq m A5 (takeaway), 190 sq m D2 (gym/fitness studio space), open space incorporating SuDS; vehicle parking; and associated services, structural landscaping, infrastructure and groundworks.
4	19/01476/AS	Newtown Railway Works, Newtown	1.7 (W)	Detailed application for a mixed-use development comprising:- film/ TV Studios with associated post-

ID	Reference and Status	Site Name/Address	Distance (km)	Summary Planning Description
	Approved 01/09/2020 - Development underway	Road, Ashford, Kent, TN24 0PN		production offices and workshop and media village (18,845 sqm) (Use Class B1); a hotel (Use Class C1) including ancillary space and circa 62 serviced apartments (Use Class C3) (max. 112m AOD); a multi-storey carpark (max. 62m AOD); change of use, internal and external alterations to the listed Locomotive Shed buildings, including increasing the height by an additional two-storeys (max. 62m AOD), to provide flexible commercial floorspace (7,185 sqm) for use in connection with the film/TV studios (Use Class B1/ D1) including 265 sqm café (Use Class A3) and circa 302 residential units (Use Class C3) and internal parking spaces; change of use, internal and external alterations to listed Engine Shed building, including increasing the height by an additional two storeys (max.53m AOD) , to provide (2,605 sqm) flexible commercial space (Use Class B1/ D2/A3) and; change of use, internal and external alterations of the Paint Shop building, Acetylene Store and Clock Tower listed buildings to provide ancillary uses to the film/TV studios (Use Class B1); plus associated infrastructure including open space, landscape and public realm provision, external parking, servicing, pedestrian and vehicular access and associated engineering, utilities and infrastructure works.
5	18/00652/AS Approved 26/09/2019 - Development underway	Land south of Park Farm East, Hamstreet Bypass, Kingsnorth, Kent	2.45 (SW)	Full planning application for 353 dwellings, new accesses from Finn Farm Road, Cheeseman's Green Lane and Brockman's Lane and creation of a T junction between Finn Farm Road and Rutledge Avenue. Creation of a new access serving 1, 3, 5, 7 and 9 Finn Farm Road. On site highway works together with associated parking, infrastructure, drainage, open space, landscaping and earthworks.
6	12/01245/AS Approved 24/10/2014 - Development underway	Conningbrook, Willesborough Road, Kennington, Kent	1.7 (N)	Creation of a country park for recreational and water-sports purposes with a range of associated facilities including an activity centre, a public house/restaurant, change of use of Manor to offices, car parks and other ancillary works and structures including works to the Julie Rose Stadium; construction of 300 dwelling residential development with associated infrastructure and landscaping; and provision of an aggregates storage and distribution facility ** SUBJECT TO AN ENVIRONMENTAL IMPACT ASSESSMENT**
7	22/00131/AS Approved 09/10/2024 – Not Started	Mineral Depot, Conningbrook, Willesborough Road, Kennington, Ashford, Kent, TN24 9QP	2.4 (N)	Outline application for residential development of up to 170no. dwellings including details of access (all other matters reserved for future consideration). AMENDED PLANS RECEIVED.
8	PA/2022/2851 Approved 26/10/2023 – Not Started	Land East of Ashford Road, Kingsnorth	4.1 (SW)	Outline application for up to 15 dwellings, a replacement Medical Centre and Pharmacy, together with all necessary infrastructure to consider access.
9	15/00856/AS Approved 06/11/2023 – Not Started	Land at Pound Lane, Magpie Hall Road, Bond Lane and, Ashford Road, Kingsnorth, Kent	4.1 (SW)	Outline application for a development comprising of up to 550 dwellings in a mix of size, type and tenure. Provision of local recycling facilities. Provision of areas of formal and informal open space. Installation of utilities, infrastructure to serve the development including flood attenuation, surface water attenuation, water supply, wastewater facilities, gas supply, electricity supply (including sub-station, telecommunications infrastructure and renewable energy). Transport infrastructure including highway improvements in the vicinity of Ashford Road/Magpie Hall Road/Steeds Lane, Pound Lane and Bond Lane, plus an internal network of roads and junctions, footpaths and cycle routes. New planting and landscaping both within the proposed development

ID	Reference and Status	Site Name/Address	Distance (km)	Summary Planning Description
				and on its boundaries as well as ecological enhancement works. Associated groundworks.
10	19/01032/AS Approved 04/05/2020 - Development underway	Parcel R, Land at Chilmington Green, Ashford Road, Great Chart, Kent	4.9 (W)	Reserved matters for the development of 82 residential dwellings within Parcel R, Main Phase AAP 1 including associated roads, parking, landscaping, open space and infrastructure pursuant to outline permission granted under 12/00400/AS.
11	15/01671/AS Approved 24/11/2016 - Development underway	Former Powergen site, Victoria Road, Ashford, Kent	3.8 (NW)	Hybrid application for five plots comprising: (1) Full and detailed application for plots 1 and 2 comprising: erection of 400 dwellings, a retail kiosk/cafe unit (Use class A1/A3) and associated parking, public surface car park, plant and storage; together with landscaping and access works. (2) Outline application with appearance and landscaping reserved with parameters for plots 3, 4 and 5 comprising: demolition of existing buildings/structures and erection of up to 260 dwellings, associated parking, plant and storage together with landscaping and access works.
12	15/01282/AS Approved 22/02/2019 - Development underway	Land opposite, 1-8 Elwick Road, Ashford, Kent	3.5 (NW)	Outline application for residential development of up to 200 units within Class C2 (residential institution) and Class C3 (dwellinghouses) uses and associated access arrangements (Phase 2).
13	12/00400/AS Approved 06/01/2017 - Development underway	Land at Chilmington Green, Ashford Road, Great Chart, Kent	5 (W)	Outline application for a Comprehensive Mixed-Use Development comprising: Up to 5,750 residential units, in a mix of sizes, types and tenures. Up to 10,000 m ² (gross external floor space) of Class BI use; Up to 9,000 m ² (gross external floorspace) of Class AI to A5 uses; Education (including a secondary school of up to 8 ha and up to four primary schools of up to 2.1 ha each); Community Uses (class DI) up to 7,000 m ² (gross external floorspace); Leisure Uses (class D2) up to 6,000 m ² (gross external floorspace); Provision of local recycling facilities. Provision of areas of formal and informal open space. Installation of appropriate utilities infrastructure as required to serve the development, including flood attenuation works, SUDS, water supply and wastewater infrastructure, gas supply, electricity supply (including substations), telecommunications infrastructure and renewable energy infrastructure (including CHP in the District Centre); Transport infrastructure, including provision of three accesses on to the A28, an access on to Coulter Road I Cuckoo Lane, other connections on to the local road network, and a network of internal roads, footpaths and cycle routes. New planting and landscaping, both within the Proposed Development and on its boundaries, and ecological enhancement works; and Associated groundworks.
14	18/01822/AS Reasonably Foreseeable - Not started	Land at Court Lodge, Pound Lane, Kingsnorth, Kent	3.69 (SW)	Construction of up to 1000 new homes (C3), local centre comprising retail uses (up to 450 sqm A1-A5) flexible office space (up to 350 sqm B1) and community facilities including a primary school (2.4ha), a combined community hall and site management suite (up to 650 sqm D1). New means of vehicular accesses onto Pound Lane, Long Length, Magpie Hall Road, new pedestrian and cycle routes laying out of green infrastructure, including allotment gardens and areas of ecological habitats. Drainage infrastructure, earthworks and ancillary infrastructure. *Note this is an EIA application accompanied by an Environmental Statement.
15	19/01597/AS Reasonably Foreseeable - Not started	Home Plus, Beaver Road, Ashford, Kent, TN23 7RR	2.8 (NW)	The erection of 216 residential units comprising 207 apartments and 9 townhouses (C3) and commercial floorspace comprising 3 commercial units (Units A, B and C) for a flexible range of uses (A1, A3, A4, A5,

ID	Reference and Status	Site Name/Address	Distance (km)	Summary Planning Description
				B1, D1 and D2) and roof top restaurant, with associated access and landscaping.
16	PA/2024/1087 Reasonably Foreseeable - Not started	Land north of M20 Coastbound south of, Kennington Road, Willesborough	1.8 (NW)	Outline application for up to 180 dwellings with associated infrastructure, engineering works, and open space with all matters reserved except for access from Kennington Road
17	PA/2022/2772 Reasonably Foreseeable - Not started	Land south of Asda, Kimberley Way, Ashford	2.1 (W)	Application for outline planning permission for up to 46,000 sqm of employment floorspace (Use Class E and B2) with all matters reserved except access (excluding internal circulation routes and links to pedestrian and cycle network) and change of use of land to parkland including flood storage area.
18	19/01701/AS Reasonably Foreseeable - Not started	Land east of Ham Street By-Pass and south west of, Brockmans Lane, Kingsnorth	3.4 (SW)	Outline planning application for residential development of up to 100 dwellings with all matters reserved except for the main access point off Brockmans Lane into the site.

- 2.60. An initial screening exercise was undertaken by each technical discipline to determine which cumulative schemes are relevant to their specific discipline. Further information is provided within the relevant technical chapters (**Chapters 6 to 11**, and **Volume 3**) with a summary provided in **Appendix 2.4**.
- 2.61. Likely Inter Development Effects between the Development and the Cumulative Schemes during its continued operation have been assessed within the technical topics contained in this ES (**Chapters 6 to 11** and **Volume 3**).

General Assumptions and Limitations

- 2.62. Universal assumptions and limitations (common to all technical topics) that have been identified during the undertaking of the EIA are set out below.
- The content and conclusions of this ES were accurate at the date of its publication. Various factors can result in contextual changes to the assessments undertaken and presented in this ES, e.g. changes to policy / legislation, changes to baseline conditions etc. over time.
 - Information received from third parties (e.g. data searches) is assumed to be accurate, complete and up to date.
 - A pre-development baseline, with the RMA Phase 1A in place, has been assumed for the Application Site. This is considered to present a reasonable worst-case baseline for the purpose of the assessment. Each technical chapter will set out the relevant baseline conditions.
 - Environmental information, produced by Mott MacDonald, to accompany the SDO applications is assumed to be accurate and complete. Where relevant, this information has been used to inform the pre-development baseline studies for this EIA and appropriately referenced.
 - Given that the construction related effects have already occurred, and that the IBF has permission to operate until 31 December 2025, the operational effects described in this ES relate to the period from 1 January 2026 onwards.
 - The design, construction and operation of the Development would satisfy environmental standards consistent with contemporary legislation and best practice.
- 2.63. Wherever possible, the assessments undertaken as part of the EIA were quantitative. Where quantitative assessment was not possible, a qualitative assessment was undertaken objectively using professional and expert judgement and experience.

- 2.64. Any uncertainties or assumptions made during the assessment process are clearly outlined in the relevant technical chapters.

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