7. Transport & Access

Introduction

7.1. This chapter, which was prepared by Waterman, presents an assessment of the likely transport effects of the Development. CVs for the competent experts responsible for preparing this chapter are provided in **Appendix 1.2, ES Volume 2**.

7.2. This chapter provides a description of the methods used in the assessment. This is followed by a description of the relevant baseline conditions of the Application Site and surrounding area, together with an assessment of the likely significant effects of the Development during operation. Mitigation measures are identified where appropriate to avoid, reduce or offset any adverse effects identified and / or enhance likely beneficial effects. Taking account of the mitigation measures, the nature and significance of the likely residual effects are described.

7.3. Assessment of the construction phase of the Development has been scoped out as this phase is complete and further construction operations associated with operation of the IBF are not anticipated.

7.4. This chapter is supported by the following figure, **Figure 7.1:** Study Area & Link Location Plan.

7.5. A standalone **Transport Assessment** and appended supporting **Staff Travel Plan** accompany the planning application.

Planning Policy and Guidance

7.6. The following comprises a summary of the key policy and guidance of relevance to this assessment. The chapter considers relevant national and local planning policies and guidance:

- National Planning Policy Framework 2024, Paragraphs 105 and 109-118[1];
- Ashford Local Plan 2030, policies TRA4 (Promoting the Local Bus Network), TRA5 (Planning for Pedestrians), TRA6 (Provision for Cycling), TRA7 (The Road Network and Development), TR8 (Travel Plan, Assessments and Statements) and TRA9 (Planning for HGV Movement)[2];
- Kent County Council Local Transport Plan 5 (2016-2031)[3];
- Freight Action Plan for Kent 2017, Actions 1-4[4]; and
- Kent County Council Rights of Way Improvement Plan 2018-2028)[5].

Assessment Methodology and Significance Criteria

Assessment Methodology

Establishing Baseline Conditions

7.7. The baseline conditions are established through an extensive data collection exercise including:

- Accessibility audits of the existing transport network surrounding the Application Site;
- Procurement of observed Manual Classified Count (MCC) and Automatic Traffic Count (ATC) data at key junctions and highway links;

- Analysis of traffic flows extracted from the South East Regional Traffic Model (SERTM) (available within the Transport Assessment report submitted in March 2022 (Document Ref: 419419-MMD-XX-SV-RP-TP-003) for the extant approved temporary planning permission under The Town and Country Planning (Border Facilities and Infrastructure) (EU Exit) (England) Special Development Order (SDO) 2020;
- A review of collision data from the online Crashmap Pro website for the most recently available 3-year period (2021-2023); and
- A review of the Trip End Model Presentation Program (TEMPro): This is a software tool used for viewing and analysing the National Trip End Model (NTEM) dataset. It provides forecasts of trip ends by geographical area, transport mode, travel time, and purpose of journey.

Evolution of the Baseline

7.8. In accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)[6] (EIA Regulations), the assessment has consideration of the likely evolution of the baseline in the absence of the Development (i.e. were the application for the continued use and operation not to be successful). This is to determine the likely effect if the cumulative schemes and any relevant policy designations were to come forward in the absence of the Development.

7.9. This chapter considers a scenario in the absence of the Development being implemented (i.e. if full planning permission for the Development is not granted) to determine the likely evolved baseline conditions, based on professional judgement.

Assessment Methodology

7.10. The identification and assessment of the likely significant transport effects of the Development used the following well-established models and standard procedures, alongside professional judgement:

- Identification of a study area for the assessment;
- Establishing the baseline transport conditions at and around the Application Site following a review of the traffic data contained within the Transport Assessment prepared in support of the temporary SDO;
- Review of the local area to identify potentially sensitive receptor locations that could be affected by changes in traffic flows due to the Development;
- Assessing likely traffic flows from the completed and operational Development using observed traffic data (recorded in October 2024) and forecast data contained within the Transport Assessment prepared in support of the temporary SDO;
- Determination of the effects of the operational phase of the Development;
- Identification of mitigation measures, where appropriate; and
- Assessing the likely significance of any residual transport effects.

Demolition and Construction

7.11. As the IBF is already built and operational, construction impacts were scoped out of the ES. However, in response to the EIA Scoping Request, ABC requested a summary of construction

effects within each relevant ES chapter, which is addressed under the 'Summary of Construction-related effects' section of this chapter.

7.12. Given the above, as there is no demolition or construction associated with the Development, these elements are therefore not considered further within this chapter.

Operational Development

7.13. For the purposes of this assessment, the year 2022 has been used to assess the pre-development baseline (i.e. without the Sevington IBF), consistent with the SDO temporary planning approval. The 'opening' year 2026 is used for the 'without Development' and 'with Development' scenarios – representing the expected first year of operation of the Development with full planning approval.

Significance Criteria

7.14. Significant effects are likely to occur when a sensitive receptor is subject to an impact of a considerable magnitude. The significance of the effect on the receptor or receptors in question is a product of considering the magnitude of the impact having regard to the sensitivity of the receptor.

7.15. The following sections define the methodology for determining both the sensitivity of the receptor and the magnitude of impacts in relation to transport and access, followed by a matrix which can then be used to determine the significance of the resultant effects.

Sensitivity of Receptor

7.16. The IEMA 'Guidelines for the Environmental Assessment of Road Traffic' (the 'IEMA guidelines') identify groups and special interests which should be considered:

- people at home;
- people in workplaces;
- sensitive groups including children, the elderly and disabled;
- sensitive locations e.g. hospitals, churches, schools, historical buildings;
- people walking;
- people cycling;
- open spaces, recreational sites, shopping areas;
- sites of ecological / nature conservation value; and
- sites of tourist / visitor attraction.

7.17. Categories of receptor sensitivity have been defined from the principles set out in the IEMA guidelines. They include the following.

- the need to identify particularly groups or locations which may be sensitive to changes in traffic conditions;
- the list of affected groups and special interests set out in the guidance;
- the identification of links or locations where it is felt that specific environmental problems may occur; and

- such locations "…would include accident blackspots, conservation areas, hospitals, links with high pedestrian flows etc."

7.18. These categories have been used to outline in broad terms the sensitivity of receptors to traffic for the categories of impact assessed in this chapter, although in detail, each receptor assessed would have a different sensitivity to each specific impact.

7.19. High sensitivity receptors include:

- schools, colleges and other educational institutions;
- retirement / care homes for the elderly or infirm;
- roads used by pedestrians with no footways; and
- road safety blackspots.

7.20. Medium sensitivity receptors include:

- hospitals, surgeries and clinics;
- parks and recreation areas;
- shopping areas; and
- roads used by pedestrians with narrow footways.

7.21. Low sensitivity receptors include:

- open space;
- tourist / visitor attractions;
- historical buildings; and
- churches

7.22. Negligible

- Receptors with no material sensitivity to traffic flows

Geographical Scope

7.23. The IEMA guidelines provide a general rule that can be used as a screening process to establish the extent of the assessment. The proposed study area for the transport and movement assessment would comprise links using these rules:

- 'Rule 1 - Include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%); and
- Rule 2 - Include any other specifically sensitive areas where traffic flows have increased by 10% or more'.

7.24. The 2022 baseline 18-hour average annual weekday traffic (AAWT) and 24-hour average annual daily traffic (AADT) flows for roads surrounding the Application Site have been calculated using the data extracted from the Transport Assessment prepared in support of the temporary SDO.

Assessing Significance

7.25. The IEMA guidelines were reviewed in order to identify the significance criteria applicable to the assessment. For a number of likely significant impacts, there are no ready thresholds of significance. In such cases, interpretation and judgement is applied, based on knowledge of the Application Site, professional judgement and experience.

7.26. All assessments state whether each effect is either significant or not significant. As a guide, effects that are assessed as Moderate or greater are regarded as significant in (Environmental Impact Assessment (EIA) terms. The significance criteria used for the purpose of this assessment are set out below:

- adverse: meaning that changes produce dis-benefits in terms of transportation and access (such as increase of traffic, travel time, patronage or loss of service or facility); or
- beneficial: meaning that the changes produce benefits in terms of transportation and access (such as reduction of traffic, travel time or patronage, or provision of a new service, access or facility); or
- negligible: meaning there is no significant change in terms of transportation and access.

7.27. All effects identified can either be classified as beneficial or adverse. The significance of either a beneficial or adverse impact is assessed as being:

- impact of low significance: slight, very short or highly localised impact of no material consequence (e.g. traffic flow change of 10% to 30%); or
- impact of medium significance: limited impact (by extent, duration or magnitude) which may be considered significant, (e.g. a traffic flow change of 30% to 60%); or
- impact of high significance: considerable impact (by extent, duration or magnitude) of more than local significance or in breach of recognised acceptability, legislation, policy or standards, (e.g. a traffic flow change of greater than 60%).

Magnitude of Impact

7.28. Magnitude of impact, based on the change that the Development would have upon the resource/receptor, is considered within the range of high, medium, low, negligible. Consideration is given to scale, duration of impact/effect and extent of Development with reference to the definitions in **Table 7.1**.

Table 7.1: Magnitude of Impact – Transport

Description	Impact	Low	Medium	High
Highway Network	Change in flow on highway network	Increase or decrease in flow of 10-30%	Increase or decrease in flow of 30-60%	Increase or decrease in flow of more than 60%
Pedestrian Severance	Increase in Average Annual Daily Traffic Flows	As set out in **Table 7.2**.		

Description	Impact	Low	Medium	High
Driver Delay	Increase in traffic flows can impact upon the operation of junctions on the highway network with queueing and congestion experienced	No prescribed quantitative significance criteria. Driver delays are only likely to be significant where the traffic on the network is at, or close to, capacity. Professional judgement has therefore been used, based upon Ratio of Flow to Capacity (RFC) and total delay (PCUHr) values from the peak hour junction assessments, where significance has been quantified as 'negligible' where changes in delay are less than double the base situation, 'low-medium' where delays are double to treble, and 'high' where delays more than treble.		
Pedestrian Delay	Increases in traffic flows can lead to increases in delay for pedestrians seeking to cross the road	No prescribed quantitative significance criteria for pedestrian delay within IEMA guidelines. Professional judgement has therefore been used		
Pedestrian Amenity	Relative pleasantness of a route in respect of increases in vehicular traffic associated with the Development	Indicative threshold applied in judging significance of changes in pedestrian amenity where traffic flow (or lorry composition) is halved or doubled		
Pedestrian Fear & Intimidation	Increases in hourly traffic flow, goods vehicle (OGV) composition and narrow footways	As set out in **Table 7.2**.		
Accidents & Safety	Where a Development is expected to change the character of the traffic on the road network, for example increased OGV movements, consideration of the potential accident / safety risks should be considered	No prescribed quantitative significance criteria for accidents and safety within the Guidelines. Professional judgement is therefore to be used		

7.29. Fear and intimidation criteria are considered in the IEMA guidelines to be dependent on the volume of traffic, composition of traffic, proximity to people and design measures such as width of pavements. For the purposes of this assessment, the level of fear and intimidation associated with traffic is set out in **Table 7.2**.

Table 7.2: Pedestrian Severance & Fear / Intimidation

Level	Pedestrian Severance (AADT)	Fear and Intimidation		
		Average Flow over 18hr day AV Flow (veh/hr – two-way)	Total 18hr OGV Flow (veh/hr – two-way)	Ave 18hr Veh Speed
High	>16,000	+ 1,800	+3,000	+ 20mph
Medium	8,000 – 16,000	1,200 – 1,800	2,000 – 3,000	+15–20 mph
Low	<8,000	600 – 1,200	1,000 – 2,000	+10–15 mph
Negligible		< 600	<1,000	<10mph

7.30. The criteria in **Table 7.1** and the level of fear and intimidation associated with traffic as set out in **Table 7.2** have been combined using professional judgement to indicate the likely significance of the impacts from the Development in terms of fear and intimidation.

Significance of the Effect

7.31. The predicted level of effect is based upon the consideration of magnitude of impact and sensitivity of the resource/receptor to come to a professional judgement of how important this effect is. **Table 7.3** sets out the significance that will be ascribed to effects upon transport and access sensitive receptors.

Table 7.3: Significance of Effect Matrix

Sensitivity of Receptor	Magnitude of Impact				
	Very Large	Large	Medium	Low	Very Low
Very High	Major	Major	Moderate	Moderate	Negligible
High	Major	Moderate	Moderate	Minor	Negligible
Medium	Moderate	Moderate	Minor	Minor	Negligible
Low	Moderate	Minor	Minor	Negligible	Negligible

7.32. For the purposes of the transport and access assessment, effects of moderate significance and above are deemed to be significant in EIA terms.

7.33. As set out in **Chapter 2: EIA Methodology** (refer to **Table 2.1**) effects are also assigned descriptors to confirm the nature (direct or indirect), temporal scale (short-term, medium-term or long-term), permanence (temporary or permanence), type (beneficial or adverse) and spatial scale (site, neighbourhood, local, regional or national).

Assumptions, Exclusions and Limitations

7.34. The following assumptions and limitations are relevant to the transport and access assessment:

- The construction phase effects were considered and assessed as part of the temporary SDO. As no additional construction effects are anticipated as a result of the Development, the assessment of construction impacts has been scoped out.
- The IEMA methodology has a limitation when measuring traffic impact based on percentage increases from a low baseline. On roads with few baseline traffic movements, any increase can lead to a large percentage rise, despite the number of additional vehicles being low. This is true for Church Road (Sevington South), which has low existing traffic flows without development activity. Church Road mainly serves as access to the staff car park and a few private residences. Staff exiting the Application Site must turn right onto Church Road and then left onto A2070 Bad Munstereifel Road. The access strategy included widening and improving Church Road between A2070 and the staff car park entrance. This section of Church Road is designed to serve the Application Site and is excluded from the assessment as it primarily serves the Application Site with only a small number of daily movements to the existing private residences.

- The Street and Kingsford Street in Mersham have been scoped out of the assessment as no goods vehicle trips are expected to route via these roads, and only a negligible number of staff trips might potentially route via these roads, where location of residence required it.
- Further, it should be noted that the Development does not generate 'new' OGV trips to the Strategic Road Network (SRN). These goods vehicles are, in practice, already on the SRN (using the M20 and/or A2070) and simply divert to the Application Site for processing. This chapter considers all trips to / from the Application Site as new trips within the study network, which provides a further level of robustness to the assessment.

7.35. General assumptions and limitations which apply to all technical chapters are set out in **Chapter 2: EIA Methodology**.

Consultation

7.36. Consultation regarding the methodology for the transport and access assessment was undertaken via the EIA scoping consultation process. The key points raised in these consultation responses, together with a commentary regarding how they have been addressed, are summarised in **Table 7.4**.

Table 7.4: Issues raised in the EIA Scoping Opinion – Transport & Access

Summary of Key Issue	How has this been addressed	Where is this addressed in the ES
Baseline traffic data	A baseline year of 2022 and future baseline year of 2026 has been applied. This has been agreed by ABC, on the proviso that the baseline data concerned excludes the traffic flows associated with the IBF, which it does. All IBF traffic flows have therefore been removed.	Under Baseline Traffic Flows (paragraph 7.62 to 7.65)
Development Traffic	National Highways have requested that the maximum past and likely future combined use(s) of the Application Site be set out.	It is not considered that full occupancy use of the Application Site will occur within the scope of the future year assessment for the ES. This scenario is considered as a sensitivity test for the 2036 horizon year assessment presented in the Transport Assessment.
Assessment scenarios	While the 2036 horizon years may be required for the Transport Assessment, there is no requirement to include these within the EIA and it is advised that these are scoped out in order to keep the Chapter concise.	The 2036 horizon year assessment is scoped out of the ES Chapter.
Study area	The study area has been determined in line with the criteria included in the IEMA	The study area is illustrated by **Figure 7.1**: Study Area & Link Location Plan.

Summary of Key Issue	How has this been addressed	Where is this addressed in the ES
	guidelines and following scoping discussions with ABC. KCC Highways (as statutory consultees) have specified the importance of assessing the impact on both the local road network (A20 and A292) as well as major roads (A2070 and M20 Junctions 10 and 10A). ABC Transport have requested that Church Road (Sevington South) and The Street/Kingsford Street in Mersham be included in the study network to be assessed.	Church Road (Sevington South) and The Street/Kingsford Street in Mersham are excluded from the study area as Development traffic will not use these routes.
PRoW	KCC PRoW & Access Service have requested appropriate consideration of Public Rights of Way by obtaining the Definitive Map and Statement from the PRoW & Access Team at KCC	The PRoW network surrounding the Application Site is described at paragraph 7.53. Further information relating to the PRoW network in the vicinity of the Application Site is provided in the Transport Assessment.

Summary of Construction-related Effects

7.37. As the IBF is already built and operational, construction impacts were scoped out of the ES. However, in response to the EIA Scoping Request, ABC requested a summary of construction effects within each relevant ES chapter.

7.38. The Analysis of Likely Environmental Effects of the Development (2022 SDO) did not assess the construction effects on traffic and transport. Instead, the impacts of changes to traffic flow were evaluated in the air quality and noise sections. A summary of these construction effects is provided in **Chapter 8: Air Quality** and **Chapter 9: Noise & Vibration** of this ES.

Baseline Conditions

Pre-Development Baseline

7.39. The Application Site is located to the south-east of Ashford in Kent, which is approximately 82km south-east of London, 18.5km west of Folkestone, and 28km west of Dover.

7.40. The M20 motorway runs to the north of the Application Site from Folkestone towards London. The M20 Junction 10 (also known as the Lacton Interchange) is located approximately 0.6km to the north-west, and the M20 Junction 10a, completed in August 2020, is located approximately 0.5km to the north-east of the Application Site. A new dual carriageway, the A2070 Link Road, is located immediately north of the Application Site, from which direct access is taken, and connects the existing section of the A2070 Bad Munstereifel Road to M20 Junction 10a.

7.41. The Application Site is bound to the south by Church Road and the rail link for the Channel Tunnel, To the east, the Application Site is bound by Highfield Lane, which is closed to through traffic. Immediately to the west of the Application Site is St Mary's Church which is a Grade I Listed building and the Milbourn Equine Centre. A Public Right of Way (PRoW) Footpath AE639 previously ran west to east across the Application Site between St Mary's Church and Highfield Lane, along with two Footpaths (AE337 and AE338) which ran northwards from St Mary's Church towards the M20. Within the immediate surrounding area there are residential properties along Church Road and further east along Kingsford Street.

7.42. The Application Site benefits from direct and easy access to the SRN via the M20 and the A2070 Bad Munstereifel Road, which prevents traffic from reaching high levels within the nearby villages.

Highway Network

7.43. The key routes on the highway network providing access to the Application Site via the SRN are the M20 and A2070 Link Road / Bad Munstereifel Road.

7.44. The M20 is a National Speed Limit (70mph) three-lane dual carriageway in each direction. Junction 10 of the M20, the Lacton Interchange, comprises a five-arm grade-separated signal-controlled roundabout with three-lane circulatory, serving the M20, A20, A292, and A2070 (north and south). The junction currently has a direct Southbound off-slip from the M20, with the northbound on-slip accessed via the A292. The Lacton Interchange does not have direct slip roads to the southern side of Junction 10, with the southbound on-slip and northbound off-slip for Junction 10a being accessed at Junction 10 (to the east) via the A20 (north of the M20) or A2070 routes (south of the M20).

7.45. The newly constructed M20 Junction 10a comprises a five-arm grade-separated part-signalised roundabout with a two-lane circulatory, serving the M20 (east and west), A20 (east and west), and A2070. Currently, only the M20 north and southbound approaches to the junction are signal-controlled.

7.46. The A2070 Link Road / Bad Munstereifel Road is a 40mph dual carriageway which provides connectivity to the south towards the Kent and East Sussex coast and to the M20 via Junction 10 and Junction 10a, which provides wider connectivity in the region from Dover, Folkestone and the Eurotunnel terminal, towards London and the rest of the United Kingdom. The key junctions on the A2070 include:

- The new A2070 Bad Munstereifel Road / A2070 Link Road roundabout (A2070 Bad Munstereifel Roundabout) close to the M20 has multiple lane approaches and a two-lane circulatory carriageway.
- The A2070 Bad Munstereifel Road / Barrey Road signalised junction which has a dedicated right turn to Barrey Road but no right turn from Barrey Road to the A2070 Bad Munstereifel Road.
- The A2070 Bad Munstereifel Road / Church Road priority junction which permits left turns into and out of Church Road but no right turn out of Church Road onto the A2070 Bad Munstereifel Road.
- The A2070 / Waterbrook Avenue / The Boulevard traffic signal-controlled junction which has multiple lane approaches from each direction.

Existing Pedestrian & Cycle Facilities

7.47. The A2070 Link Road includes segregated footways / cycleways with street lighting.

7.48. To the east, the Kingsford Street shared footbridge (built during the Junction 10a construction works to replace the Highfield Lane bridge) provides a traffic free route to the A20 to the north of the M20 for both pedestrians and cyclists. The A20 includes a shared footway/cycleway facility.

7.49. To the west, there is a newly constructed dedicated footbridge crossing the A2070 to the south of the A2070 Bad Munstereifel Roundabout (replaced and improved on the previous footbridge in the same location during the Junction 10a construction works) providing connections to the Ashford Business Park, Willesborough residential area and Ashford beyond. Cyclists are permitted on the newly built footbridge.

7.50. Footways are also provided on the western side of the A2070 dual carriageway for connections towards the south-west and Orbital Park Roundabout.

7.51. The A292 includes a street lit shared footway/cycleway facility, located to the west of the carriageway, between the M20 junction 10 Roundabout and Hythe Road.

7.52. National Cycle Network (NCN) Route 18 passes through Ashford linking Canterbury to Royal Tunbridge Wells. The nearest section of Route 18 to the Application Site is located approximately 1.8km north at Willesborough Lees, an approximately 7-minute cycle journey. Route 17 joins Route 18 to the north of Ashford and connects with Rochester.

7.53. There are a number of existing PRoW in the vicinity of the Application Site. Footpaths AE340 and AE639 route to the west of the Application Site connecting Church Road to the A2070, via St Mary's Church. Footpath AE639 previously routed through the Application Site connecting with Highfields Lane to the east. This PRoW has since been diverted around the southern boundary of the Application Site, as Bridleway AE672 between the A2070 / Church Road and Highfield Lane, which in turn provides access to Footpath AE344 which runs adjacent to the railway line to the south, Restricted Byway AE350 to the south of the railway line, and Bridleway AE673 to the east.

Existing Public Transport Facilities

7.54. The closest bus stops to the Application Site are located on Monument Way in the Orbital Business Park (to the south-west of the Application Site) and on the A20 Hythe Road (adjacent to Tesco).

7.55. Orbital Business Park is served by a single bus route (Stagecoach G Bus Service) serving Ashford International rail station, Ashford town centre and residential centres north-west of Ashford. The bus service operates hourly Monday to Saturday, except public holidays. The bus stop on Monument Way lies 1.1km or approximately 15 minutes' walk from the Application Site.

7.56. Three bus services are available at a bus stop on the A20 Hythe Road next to the Tesco Crooksfoot Superstore north of the M20. This is 1.5 km or 21 minutes' walk away. Bus services from this stop include the Stagecoach No 10/10A, 18A and 125. The Stagecoach 10/10A bus service operates hourly Monday to Saturday whereas the 18A operates one return bus service and the 125 operates every 120 minutes.

7.57. The nearest railway station to the Application Site is Ashford International Station, located approximately 2.9km from the Application Site. The Station connects several railway lines, including

High Speed 1 and the Southeastern Main Line. Services are operated by Southeastern and Southern. Services operate to numerous locations including London St Pancras, London Charing Cross, London Victoria, Dover Priory, Ramsgate, Margate, Eastbourne etc.

Collision Data

7.58. Analysis of the collision data between January 2021 and December 2023 is detailed in the Transport Assessment. The Transport Assessment provides a summary of the collisions recorded on links and junctions within the study area and **Table 7.5** details the number of collisions per link.

Table 7.5: Collision Data (2021-2023) – All Collisions

Link No.	Link Name	Collision Severity			Total
		Slight	Serious	Fatal	
1	A292 Hythe Road	1	-	-	1
2	A2070 Kennington Road	1	-	1	2
3	A20 approach to M20 J10 RBT	1	-	-	1
4	A2070 Bad Munstereifel Rd	4	1	-	5
5	A20	4	-	-	4
6	A2070	-	1	-	1
7	A2070	2	-	-	2
8	A2070 Bad Munstereifel Rd	4	2	1	7
9	A2070 Bad Munstereifel Rd	13	6	-	19
All	Total	30	10	2	42

7.59. Collisions involving vulnerable road users (pedestrians, cyclists, motorcyclists and goods vehicles) are detailed in **Tables 7.6-7.9**.

Table 7.6: Collisions Involving Pedestrians

Link No.	Link Name	Pedestrian Collisions			Total
		Slight	Serious	Fatal	
1	A292 Hythe Road	-	-	-	0
2	A2070 Kennington Road	-	-	1	1
3	A20 approach to M20 J10 RBT	-	-	-	0
4	A2070 Bad Munstereifel Rd	-	-	-	0
5	A20	-	-	-	0
6	A2070	-	-	-	0
7	A2070	-	-	-	0
8	A2070 Bad Munstereifel Rd	-	-	-	0
9	A2070 Bad Munstereifel Rd	-	-	-	0
All	Total	0	0	1	1

Table 7.7: Collisions Involving Cyclists

Link No.	Link Name	Cyclist Collisions			Total
		Slight	Serious	Fatal	
1	A292 Hythe Road	-	-	-	0
2	A2070 Kennington Road	-	-	-	0
3	A20 approach to M20 J10 RBT	-	-	-	0
4	A2070 Bad Munstereifel Rd	-	-	-	0
5	A20	1	-	-	1
6	A2070	-	-	-	0
7	A2070	-	-	-	0
8	A2070 Bad Munstereifel Rd	-	-	-	0
9	A2070 Bad Munstereifel Rd	-	1	-	1
All	Total	1	1	0	2

Table 7.8: Collisions Involving Motorcyclists

Link No.	Link Name	Motorcyclist Collisions			Total
		Slight	Serious	Fatal	
1	A292 Hythe Road	-	-	-	0
2	A2070 Kennington Road	-	-	-	0
3	A20 approach to M20 J10 RBT	-	-	-	0
4	A2070 Bad Munstereifel Rd	1	-	-	1
5	A20	-	-	-	0
6	A2070	-	1	-	1
7	A2070	-	-	-	0
8	A2070 Bad Munstereifel Rd	-	-	-	0
9	A2070 Bad Munstereifel Rd	-	-	-	0
All	Total	1	1	0	2

Table 7.9: Collisions Involving Goods Vehicles

Link No.	Link Name	Goods Vehicle Collisions			Total
		Slight	Serious	Fatal	
1	A292 Hythe Road	1	-	-	1
2	A2070 Kennington Road	-	-	-	0
3	A20 approach to M20 J10 RBT	-	-	-	0
4	A2070 Bad Munstereifel Rd	3	-	-	3
5	A20	1	-	-	1
6	A2070	-	-	-	0
7	A2070	2	-	-	2
8	A2070 Bad Munstereifel Rd	-	1	-	1
9	A2070 Bad Munstereifel Rd	3	3	-	6
All	Total	10	4	0	14

7.60. The historic accident record has been reviewed and no specific patterns or clusters of accidents identified that would have been materially impacted by the Development. Overall, there are no apparent road safety issues on the local highway network, despite a total of 42 collisions occurring within the study area during the three-year assessment period, 14 of which involved a goods vehicle.

7.61. The baseline collision and safety assessment is considered, on balance, to be Moderate or less.

Baseline Traffic Flows

7.62. A baseline year of 2022 and future baseline year of 2026 has been considered as part of this assessment. This has been agreed on the assumption that the baseline data concerned excludes the traffic flows associated with the Development, which it does.

7.63. Baseline traffic flows for 2022 (without Development generated traffic) are provided in **Table 7.10**. These traffic flows have been extracted from the area wide strategic traffic model, SERTM, and cover the nine links which form the agreed study area. A plan is provided in **Figure 7.1** which illustrates the locations of each of the junctions within the study area.

Table 7.10: Baseline 2022 Average Two Way Daily/Weekday Traffic Flows

Link No.	Link Name	AAWT (18 Hour)		AADT (24 Hour)	
		Flow	OGV %	Flow	OGV %
1	A292 Hythe Road	19,766	5.9%	21,858	5.74%
2	A2070 Kennington Road	15,034	3.5%	15,587	3.31%
3	A20 approach to M20 J10 RBT	22,698	5.6%	24,394	5.48%
4	A2070 Bad Munstereifel Rd	32,016	6.3%	34,183	6.21%
5	A20	6,333	3.4%	6,706	3.4%
6	A2070	4,983	10.7%	5,134	11.43%
7	A2070	11,436	6.4%	11,699	6.40%
8	A2070 Bad Munstereifel Rd	40,143	7.4%	42,031	7.46%
9	A2070 Bad Munstereifel Rd	19,699	7.6%	20,646	7.77%

7.64. The estimated future baseline traffic flows for 2026 (without Development generated traffic) are provided in **Table 7.11**. Future baseline flows have been forecasted by applying TEMPRO Growth Factors, as agreed with the Highway Authority during the pre-application stage. These TEMPRO Growth Factors are set out within the Transport Assessment.

7.65. The requirement to incorporate committed development traffic flows was confirmed with the Highway Authority at the scoping stage and are accounted for within the future baseline traffic flows in 2026, extracted from SERTM.

Table 7.11: 2026 Future Baseline Average Two Way Daily/Weekday Traffic Flows

Link No.	Link Name	AAWT (18 Hour)		AADT (24 Hour)	
		Flow	OGV %	Flow	OGV %
1	A292 Hythe Road	20,099	6.90%	22,245	5.23%
2	A2070 Kennington Road	15,469	3.87%	16,038	3.09%
3	A20 approach to M20 J10 RBT	23,394	5.97%	25,143	4.85%
4	A2070 Bad Munstereifel Rd	27,319	6.00%	28,485	6.56%
5	A20	9,946	4.35%	10,184	4.53%
6	A2070	19,171	2.21%	20,161	4.07%
7	A2070	11,535	6.37%	11,892	6.40%
8	A2070 Bad Munstereifel Rd	41,485	7.66%	43,786	6.75%
9	A2070 Bad Munstereifel Rd	41,950	8.29%	43,684	9.43%

Receptors

7.66. A review of the road links in the study area has been undertaken to identify their level of sensitivity. **Table 7.12** provides a summary of the links where sensitive receptors are located, with reference to the criteria set out in the approach section of this chapter. The table also includes the recorded speeds for each link.

Table 7.12: Link Receptor Sensitivity

Link No.	Link Name	Receptor Sensitivity	Speed Kph (mph)
1	A292 Hythe Road	Low/Negligible	53 (33)
2	A2070 Kennington Road	Low/Negligible	48 (30)
3	A20 approach to M20 J10 RBT	Low/Negligible	49 (30)
4	A2070 Bad Munstereifel Rd	Low/Negligible	54 (34)
5	A20	High	82 (51)
6	A2070	Low/Negligible	52 (32)
7	A2070	Low/Negligible	60 (37)
8	A2070 Bad Munstereifel Rd	Low/Negligible	55 (34)
9	A2070 Bad Munstereifel Rd	Low/Negligible	56 (35)

7.67. One sensitive receptor has been identified as High within the study area following the baseline review, as set out in **Table 7.13**.

Table 7.13: Sensitive Receptors

Receptor Name / Location	Description	OS grid reference / distance and direction from Application Site boundary	Sensitivity (Low / Medium / High / Very High)
Link 5: A20	Pilgrims Hospice Ashford	TR 04337 41439 / 400m north of the Application Site	High

7.68. Link No.5 is considered a high sensitivity receptor due to the close proximity of the Pilgrims Hospice Ashford to this link.

7.69. With the exception of Link No.5 (A20) all other links which form part of the study area are considered to be Low/Negligible sensitivity receptors. These links do not provide direct frontage access to any land use, are not considered collision blackspots, include pedestrian footways (including overbridges) and are considered to not be materially sensitive to traffic flows.

Baseline Severance

7.70. Based on the criteria set out in **Table 7.2** the existing levels of severance and fear / intimidation on the road network surrounding the Application Site are considered within **Table 7.14**. All the link flows considered are as two-way flows on a particular link.

Table 7.14: Baseline 2022 Levels of Severance and Fear / Intimidation

Link No.	Pedestrian Severance (24hr Flows)		Fear and Intimidation						
			a) Av hourly flows over 18hr day		b) Total 18hr OGV flows		c) Traffic speed (mph)		d) Weighted Assessment of a– c
	Flow	Severance	Flow	Severance	Flow	Severance	Speed	Severance	
1	21,858	High	1,098	Low	1,164	Low	33	High	Medium
2	15,587	Medium	835	Low	521	Negligible	30	High	Low
3	24,394	High	1,261	Medium	1,275	Low	30	High	Medium
4	34,183	High	1,779	Medium	2,032	Medium	34	High	Medium
5	6,706	Low	352	Negligible	218	Negligible	51	High	Low
6	5,134	Low	277	Negligible	534	Negligible	32	High	Low
7	11,699	Medium	635	Low	728	Negligible	37	High	Low
8	42,031	High	2,230	High	2,981	Medium	35	High	Medium
9	20,646	High	1,094	Low	1,496	Low	35	High	Medium

7.71. The following links experience high levels of pedestrian and cycle severance due to the volume of traffic exceeding 16,000 AADT:

- Link 1: A292 Hythe Road;
- Link 3: A20 approach to M20 J10 Roundabout
- Link 4: A2070 Bad Munstereifel Road;
- Link 8: A2070 Bad Munstereifel Road; and
- Link 9: A2070 Bad Munstereifel.

7.72. It is concluded that locally, the existing level of severance experienced is in most cases high. This is however not to the detriment of pedestrian/cyclist safety as overbridges are provided on the A2070 and Kingsford Street which provide safe and convenient links for pedestrians and cyclists with the wider footway/cycleway network.

Baseline Driver Delay

7.73. There is no prescribed quantitative significance criteria for driver delay within IEMA guidelines. Professional judgement has therefore been used to determine the effect, with consideration given to the 2024 (in lieu of 2022 baseline) peak hour pre-development baseline junction capacity assessment result outputs contained within the Transport Assessment and the theoretical link capacity of the local highway network.

7.74. As evidenced in the Transport Assessment all modelled junctions which form part of the study area are demonstrated to operate within their practical capacity in the 2024 (TA peak hour assessment) baseline scenario with only moderate delays experienced by drivers. This is despite high traffic flows being recorded on several of the links.

7.75. Overall, it is concluded that the existing level of driver delay experienced is in most cases Minor or less (negligible) with the exception of localised delay on the A2070 Bad Munstereifel Road / Waterbrook Avenue junction, and M20 J10a, in the PM Peak, which are considered to experience moderate delay.

Baseline Pedestrian & Cycle Delay

7.76. Only a small number of published qualitative methods exist for assessing pedestrian delay. The IEMA guidance suggests a range of pedestrian crossing times of ten seconds (lower threshold) to 40 seconds (higher threshold), which equate to a link with no crossing facilities and a two-way flow of approximately 1,400 vehicles in the peak periods. However, the guidance also recommends that assessments should be based on judgement rather than specific thresholds to determine whether or not there is a significant pedestrian delay. Notwithstanding this, the thresholds described in the guidance have been used as a starting point for this assessment. No specific guidance exists for the assessment of cyclist delay.

7.77. For the purpose of this assessment, and in combination with professional judgement, pedestrian and cyclist delay was classed as:

- Low, where traffic flows are less than 1,400 two-way vehicles per hour;
- Medium, where flows are between 1,400 and 2,800 two-way vehicles per hour; and
- High, where traffic flows exceed 2,800 two-way vehicles per hour.

7.78. Traffic flows exceed 1,400 vehicles on Link No.4 and Link No.8, two sections of the A2070 Bad Munstereifel Road. Hourly two-way vehicle flows of 1,779 and 2,230 are recorded on these links which would normally equate to a Moderate delay. However, to the south of the A2070 Bad Munstereifel Road a footbridge is provided over the A2070 Bad Munstereifel Road, offering a traffic free link for pedestrians and cyclists. The existing level of pedestrian/cycle delay experienced on these links is considered negligible. At all other links within the study area, the existing level of pedestrian/cycle delay experienced within the study area is in most cases Minor or less (Negligible).

Baseline Pedestrian Amenity

7.79. Pedestrian amenity is broadly defined as the relative pleasantness of a journey and is affected by traffic flows, traffic composition, footway width and the degree of segregation from traffic.

7.80. The existing level of pedestrian amenity along the A2070 (to the north of the Application Site) is generally good, the speed limit is 40mph and there is a street lit shared footway/cycleway provided adjacent to the Application Site (south of the carriageway).

7.81. Other links within the study area include the Kingsford Street shared footbridge which provides a traffic free route to the A20 for both pedestrians and cyclists. The A20 includes a shared footway/cycleway facility. To the west of the Application Site, there is a newly constructed dedicated footbridge crossing the A2070 to the south of the Bad Munstereifel roundabout providing connections to the Ashford Business Park, Willesborough residential area and Ashford beyond. Cyclists are permitted on the newly built shared use footbridge. Footways are also provided on the western side of the A2070 dual carriageway for connections towards the south-west and Orbital Park Roundabout. The A292 includes a street lit shared footway/cycleway facility, located to the west of the carriageway, between the M20 junction 10 Roundabout and Hythe Road.

7.82. The majority of the links within the study area carry medium-high volumes of traffic. Locally there are railings, overbridges and controlled/uncontrolled crossing points provided for pedestrians/cyclists at key locations.

7.83. Overall pedestrian Amenity in the vicinity of the Application Site is considered to be good. A rating of Low is therefore considered appropriate.

Baseline Fear and Intimidation

7.84. Fear and intimidation criteria are considered in the IEMA guidelines to be dependent on the volume of traffic, composition of traffic, proximity to people and design measures such as width of pavements. These indicators are then combined using professional judgment to indicate the likely significance of the impacts from the Development in terms of fear and intimidation.

7.85. There is one link within the study area which experiences high levels of pedestrian fear and intimidation, the A2070 Bad Munstereifel Road (Link No.8). This link experiences high hourly flows, high vehicle speeds (35mph) and a medium percentage of OGV's. All other links do not experience high levels of fear and intimidation. This is primarily due to the low to medium average 18 hourly flows and the low/negligible amount of OGV's on the highway network. Whilst average vehicle speeds do exceed 20mph (which results in a rating of high) this is not considered to be to the detriment of pedestrian/cyclist fear and intimidation levels due to the good pedestrian/cycle facilities that are currently available locally, which include footbridges crossing the A2070 and Kingsford Street, both of which permit cyclists to use them as well.

7.86. Within the study area the existing level of pedestrian severance experienced is in most cases Minor or less.

Baseline Collisions / Safety

7.87. Analysis of the collision data between 2021 and 2023 is detailed in the Transport Assessment. The Transport Assessment provides a summary of the collisions recorded on links / junctions within the immediate area surrounding the Application Site and identified that:

- A total of 42 Personal Injury Accidents (PIAs) were recorded across the study network during the three-year study period January 2021 to December 2023 inclusive.
- Of the 42 PIAs, 30 were classified as 'Slight' in severity, 10 as 'Serious', and two as 'Fatal'.
- A total of 14 PIAs (approximately one third) involved goods vehicles.
- A total of two PIAs involved motorcyclists, two PIAs involved pedal cyclists, and just one PIA involved a pedestrian, albeit resulting in a fatality.

7.88. Overall, no specific patterns or clusters of accidents were identified that would have been materially impacted by the Development and there are no apparent road safety issues within the study area. The existing collision and safety assessment is therefore considered to be Minor to Moderate.

Embedded Mitigation and Design Features (Inherent Mitigation)

7.89. Embedded mitigation measures already included within the design of the existing complete and operational Sevington IBF include:

- A traffic signal controlled junction on the A2070 (including right turn lane).
- A priority junction onto Church Road
- Provision of 60 staff cycle spaces;
- Provision of 3 electric vehicle (EV) parking spaces served by 2 EV charging points;
- Pedestrian/cycle access to the Development, includes a segregated 3m wide shared use footway/cycleway which links to the existing path network running adjacent to the A2070
- Guardrail installed adjacent to the path at the main site access to provide definition and direct all users to the designated (signal controlled) crossing points. The pedestrian / cycle access into the Application Site itself is located on Church Road, meaning all users travelling to / from Ashford (i.e. from the west) do not need to cross the path of goods vehicles which are entering and exiting the Application Site at the main access.
- The pedestrian access into the Sevington IBF site is provided for staff only. Therefore, no signage is provided for pedestrians outside the Application Site as there will be no public access. Staff will be informed of access points prior to beginning work on the Application Site.

7.90. Other embedded mitigation measures include:

- Operational Management Plan - In order to support the operation of the Application Site, an Operational Management Plan (OMP) was prepared at the SDO application stage. The aim of the OMP is to provide a comprehensive operational plan for the Application Site and to deliver policies and procedures allowing for its safe operation. The document contains a Traffic Management Plan (TMP), Signage Strategy and Staff Travel Plan (STP) as detailed in the following sections.
- Traffic Management Plan - A Traffic Management Plan (TMP) was prepared for the Application Site at the SDO application stage to minimise the impact on the local transport network. The

TMP includes measures to ensure the 24-hour a day management of goods vehicles travelling on the SRN between the M20 and the Application Site, as well as a suitable response to any incidents. The TMP establishes how traffic issues should be identified, which measures should be implemented, by whom and the governance process for traffic management of the Application Site. The TMP includes an escalation process for the site marshals should there be an on-site incident that could cause goods vehicles to block back onto the SRN, such as a goods vehicle breaking down and blocking the main access on the A2070.

- Signage Strategy - The Site Signage Strategy, directing goods vehicle drivers to and from the Application Site based on using M20 Junction 10a and the A2070, was developed at the SDO application stage and forms part of the OMP. This strategy has been completed and implemented, with Advanced Direction Signs (ADS) directing goods vehicle drivers to the Application Site. Whilst within the Application Site itself, directional information provided to drivers will be augmented by the use of road markings and directions from site marshals when necessary.
- Staff Travel Plan - A Staff Travel Plan (STP) has been prepared to encourage greater use of sustainable transport, although it is acknowledged that alternatives to car use are constrained. Car sharing and sustainable modes of travel are promoted through the STP which has the following aims:
  - Raise awareness of all alternative opportunities to single occupancy private car use.
  - Encourage the use of public transport to the Application Site.
  - Encourage the use of car sharing to the Application Site.
  - Investigate barriers to travelling sustainably.
- The STP includes the provision of a shuttle bus, run by Zeelo, available for staff travel to site. The shuttle service transports staff from two offsite locations, Ashford International Station; and Ashford Park and Ride, to Sevington IBF for no fee. The shuttle bus can be booked in advance via an App and the service timetable aligns with shift patterns. The Zeelo shuttle bus offers a good alternative to driving onsite for staff and offers the opportunity for staff to use rail to get to work.

7.91. Overall, the Development represents extensive infrastructure improvements in terms of a bespoke bus service, pedestrian and cycle facilities and providing new accesses into the Application Site, relative to the pre-development baseline. As such this assessment considers the effects to result in a 'neutral / negligible' (not significant) impact within the study area. The Development will implement a STP, which will ensure that no significant effects related to staff travel will arise and therefore no further mitigation is deemed necessary.

Assessment of Likely Significant Operational Effects

7.92. The Development comprises of the retention and continued operation of the existing Inland Border Facility and Border Control Post (IBF) which comprises: goods vehicle parking for 984 vehicles, including 42 entry lanes with a capacity of up to 240 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.

7.93. The IBF will continue to be used as a border check facility for a variety of governing bodies including His Majesty's Government (HMG); the Department for Transport (DfT); HMRC including Border Force as its operational agent; and Defra, including the Port Health Authority (PHA) and Animal and Plant Health Agency (APHA).

7.94. Vehicle access is provided with staff vehicles entering and exiting via Church Road in the southwestern corner of the Application Site. Staff will be informed that vehicular access to the Application Site shall be via Church Road (via its junction with A2070 Bad Munstereifel Road) only. For staff leaving the Application Site, the junction design is for a right turn only onto Church Road, then a left turn only onto the A2070 Bad Munstereifel Road.

7.95. Goods vehicle access is provided to the north of the Application Site, connecting to the A2070 link road which feeds directly onto the M20.

7.96. Most goods vehicles visiting the Application Site are expected to approach the Ashford area via the M20 exiting at Junction 10a and using the A2070 Link Road to enter the Application Site via the main access junction. Goods vehicles will be directed to use Junction 10a rather than Junction 10 by the Site Signage Strategy. However, it is acknowledged that a small number of goods vehicle drivers might not follow the signed route or will have a legitimate reason for alternative routing to access / egress the Application Site via the A2070 to the south for origins/destinations in South-East Kent or East Sussex.

7.97. Goods vehicles leaving the Application Site are directed to turn right out of the main access junction onto the A2070 Link Road and then use M20 Junction 10a. However, it is acknowledged that a small number of goods vehicle drivers might not follow the signed route or will have a legitimate reason for undertaking a left-turn out of the Site to access the A2070 southbound.

7.98. Goods vehicle parking areas with clearly marked bays are provided including designated areas for hazardous loads and electric hook up points for refrigerated vehicles. Access to the parking areas for goods vehicles is managed through the use of 'entry lanes'.

7.99. Once goods vehicles arrive at the Application Site, they will wait for a short period of time in one of the 42 'entry' lanes where they will be assessed by a security marshal until they are directed to an goods vehicle parking bay. The 'entry' lanes make use of an internal queuing system for each checking area with goods vehicles moving forward as the vehicles ahead of them are processed. Traffic and security marshals will manage this area, and drivers will not be allowed to leave their vehicles whilst being checked.

7.100. Once at the front of the queue, the vehicle will be directed by a security marshal to pull forward into the checking area. On average, a two-minute period (including vehicle pulling forward, stopping, check undertaken, vehicle moving again) will be required to undertake each vehicle check upon entry to the IBF. To facilitate this, two security marshals will carry out each check, one will undertake a walk round the vehicle for the vehicle inspection, whilst the other will deal with the driver from an elevated booth to allow them to see the inside of the vehicle cab. Traffic management marshals will be required to direct goods vehicles to their intended destination within the Application Site using a one-way system so that they can safely park and be guided to the required office.

7.101. The Application Site will be in operation and staffed 24-hours per day.

7.102. The operations previously detailed will require approximately 406 staff per shift. There will be three eight and a half hour shifts per day with half hour overlap periods as follows:

- 07:00-15:30
- 15:00-23:30
- 23:00-07:30

7.103. For short periods of time, there will be more than 406 staff on-site due to shift changeover times. The shifts and changeover periods have been determined to avoid the local transport networks AM peak hour (08:00-09:00) and PM peak hours (17:00-18:00) thus reducing the impact of site operations on the surrounding area.

Operational Phase

7.104. Link-based development vehicle traffic flow figures are detailed in **Table 7.15**. Operational Sevington IBF trips have been calculated from the observed traffic data obtained by traffic survey in October 2024, with OGV and staff trips identified and assigned across the study network as detailed in the Transport Assessment.

Table 7.15: Development Two Way Daily/Weekday Traffic Flows

Link No.	Link Name	AAWT (18 Hour)		AADT (24 Hour)	
		Flow	OGV	Flow	OGV
1	A292 Hythe Road	282	258	294	268
2	A2070 Kennington Road	33	0	34	0
3	A20 approach to M20 J10 RBT	11	0	11	0
4	A2070 Bad Munstereifel Rd	363	258	378	268
5	A20	11	0	11	0
6	A2070	4,287	4,195	4,464	4,368
7	A2070	350	258	365	268
8	A2070 Bad Munstereifel Rd	180	0	187	0
9	A2070 Bad Munstereifel Rd	318	0	331	0

7.105. The 2026 Baseline and Development vehicle trip generation figures are detailed in **Table 7.16**.

Table 7.16: 2026 Baseline + Development Two Way Daily/Weekday Traffic Flows

Link No.	Link Name	AAWT (18 Hour)		AADT (24 Hour)	
		Flow	OGV %	Flow	OGV %
1	A292 Hythe Road	20,381	6.88%	22,539	5.17%
2	A2070 Kennington Road	15,502	4.31%	16,072	3.44%
3	A20 approach to M20 J10 RBT	23,405	6.01%	25,154	4.26%
4	A2070 Bad Munstereifel Rd	27,682	7.17%	28,862	7.58%
5	A20	9,957	4.45%	10,195	4.53%
6	A2070	23,458	20.61%	24,625	22.24%
7	A2070	11,870	6.37%	12,240	6.40%
8	A2070 Bad Munstereifel Rd	41,665	7.51%	43,974	6.81%
9	A2070 Bad Munstereifel Rd	42,268	8.63%	44,014	9.43%

7.106. The percentage change in traffic volumes as a result of Development, compared with the 2026 Baseline traffic flows are detailed in **Table 7.17.**

Table 7.17: Percentage Change in Vehicle Movements

Link No.	Link Name	AAWT (18 Hour)	AADT (24 Hour)
1	A292 Hythe Road	1.4%	1.3%
2	A2070 Kennington Road	0.2%	0.2%
3	A20 approach to M20 J10 RBT	0.0%	0.0%
4	A2070 Bad Munstereifel Rd	1.3%	1.3%
5	A20	0.1%	0.1%
6	A2070	22.4%	22.1%
7	A2070	2.9%	2.9%
8	A2070 Bad Munstereifel Rd	0.4%	0.4%
9	A2070 Bad Munstereifel Rd	0.8%	0.8%

7.107. The results in **Table 7.16** confirm that the increase on each link will be negligible, with the exception of Link No.6 where the impact would be low. Link No.6 (A2070) experiences an increase in vehicle flows of between 10%-30% indicating that the Development would have a minor adverse impact upon this road.

7.108. The percentage change in OGV volumes as a result of Development, compared with the 2026 Baseline OGV traffic flows are detailed in **Table 7.18**

Table 7.18: Percentage Change in OGV's

Link No.	Link Name	AAWT (18 Hour)			AADT (24 Hour)		
		Baseline	Baseline + Dev	% Change	Baseline	Baseline + Dev	% Change
1	A292 Hythe Road	1,386	1,403	1.2%	1,162	1,165	0.2%
2	A2070 Kennington Road	598	668	11.7%	496	552	11.3%
3	A20 approach to M20 J10 RBT	1,397	1,407	0.7%	1,220	1,071	-12.2%
4	A2070 Bad Munstereifel Rd	1,639	1,984	21.0%	1,867	2,189	17.2%
5	A20	432	443	2.4%	462	462	0.1%
6	A2070	423	4,835	1,042.3%	820	5,476	568.1%
7	A2070	735	756	2.9%	761	784	2.9%
8	A2070 Bad Munstereifel Rd	3,179	3,129	-1.6%	2,957	2,993	1.2%
9	A2070 Bad Munstereifel Rd	3,479	3,647	4.8%	4,121	4,152	0.8%

7.109. The results in **Table 7.18** confirm that the increase in OGV flows on each link will be low to negligible, with the exception of Link No.6 where the impact would be high. Link No.6 (A2070) experiences an increase in OGV flows of 1,042.3% and 568.1% indicating that the Development would have a significant adverse impact upon this road, however the sensitivity of receptor at this location is low-medium, resulting in an overall moderate effect. Goods vehicle access into the Application Site is directly provided off this road.

Future Driver Delay

7.110. The Transport Assessment confirms that the highway network will continue to operate broadly within capacity during 2026 AM and PM peak hours, with localised constraints on individual arms resulting in moderate delays being experienced by drivers.

7.111. The Development traffic is not expected to significantly increase driver delay on the majority of junctions within the study network. However, moderate increases in delay occur (i.e. greater than double the baseline delay) at M20 J10a, largely due to increased queuing on the A20 east and westbound approaches to the junction.

Table 7.19: Change in Total Delay (2026 Baseline – 2026 Development)

Junction	Period	Total Delay 2026 Baseline	Total Delay 2026 Development	Change in Total Delay	X Diff	Level of Change Effect
A2070 Bad Munstereifel Road / The Boulevard / Waterbrook Ave	AM	75.43	76.34	0.91	1.01	Negligible
	PM	66.04	67.08	1.04	1.02	Negligible
A2070 Bad Munstereifel Road / Church Road	AM	0.09	0.14	0.05	1.56	Negligible
	PM	0.12	0.19	0.07	1.58	Negligible
A2070 Bad Munstereifel Rd / Barrey Road	AM	12.82	12.86	0.04	1.00	Negligible
	PM	15.80	15.82	0.02	1.00	Negligible
A2070 3-arm Roundabout	AM	4.17	4.22	0.05	1.01	Negligible
	PM	4.46	4.55	0.09	1.02	Negligible
A2070 / Sevington HGV Access	AM	5.38	7.76	2.38	1.44	Negligible
	PM	4.97	8.49	3.52	1.71	Negligible
M20 J10	AM	51.29	48.09	-3.20	0.94	Negligible
	PM	56.96	59.38	2.42	1.04	Negligible
M20 J10a	AM	20.91	47.94	27.03	2.29	Low
	PM	17.78	47.85	30.07	2.69	Medium
A292 Hythe Road / M20 WB On-Slip	AM	10.49	10.63	0.14	1.01	Negligible
	PM	7.56	7.91	0.35	1.05	Negligible
A20 Hythe Road / Tesco Roundabout	AM	3.70	3.70	0.00	1.00	Negligible
	PM	4.09	4.09	0.00	1.00	Negligible
A20 Hythe Road / Honeysuckle Avenue	AM	9.23	9.26	0.03	1.00	Negligible
	PM	8.11	8.13	0.02	1.00	Negligible

7.112. Overall, it is concluded that the future level of driver delay experienced in most cases remains Minor or less (negligible) with the exception of localised delay on the A2070 Bad Munstereifel Road / Waterbrook Avenue junction, and M20 J10a, in the PM Peak, which continue to experience moderate levels of delay.

Future Pedestrian & Cycle Delay

7.113. The level of existing pedestrian delay is assumed to broadly reflect the severance as previously detailed above in the baseline review. There is no expected increase in pedestrian delay during the continued operation of the Development. The proposals are therefore considered to have a 'neutral / negligible' impact.

Future Pedestrian Amenity

7.114. The Development has a 'neutral / negligible' impact on pedestrian and cyclist amenity relative to the baseline. Whilst the level of traffic on roads within the study area is increased, existing footway and cycleway facilities provide employees with accessible routes to the Application Site, separated from motorised traffic. The proposals are therefore considered to have a 'neutral / negligible' impact.

Future Fear and Intimidation

7.115. The Development generates additional OGV trips on a daily basis (as detailed in **Table 7.17**) relative to the baseline, forecast to comprise a combined total of 5,476 OGV movements (i.e. two-way) per day on the A2070 east of the Site access. No significant effects are expected in terms of fear and intimidation.

Future Collisions / Safety

7.116. It is considered that traffic flows associated with the Development are not likely to be significant to the extent that there would be a material effect on collisions and safety relative to the baseline. The proposals are therefore considered to have a 'neutral / negligible' impact.

Summary

7.117. Whilst the Development results in some disruption to users of the highway network relative to the baseline, it is considered that the Development would likely result in a local, adverse impact of minor significance with regard to the disruption to pedestrians, cyclists and road vehicle users (driver delay) on and immediately surrounding the Application Site.

Mitigation and Enhancement Measures and Likely Residual Operational Effects

Other Mitigation and Enhancement Measures

7.118. A range of mitigation, design and enhancement measures are embedded within the Development, as described within this Chapter and set out in the **Transport Assessment** and appended **Staff Travel Plan**, which accompany the planning application.

7.119. The assessment of driver delay, as described within this Chapter and set out in the **Transport Assessment**, identifies that M20 J10a will be approaching capacity in the 2026 baseline on the A20 Eastbound approach to the junction in both AM and PM Peak hours. It is noted that this existing constraint is exacerbated by traffic associated with the Development, with increased queuing and delay experienced on the A20 Eastbound and A20 Westbound approaches to the junction. Potential mitigation measures, subject to agreement with Kent County Council and National Highways, may be required to alleviate congestion at this junction.

7.120. No additional mitigation, beyond the embedded mitigation set out above, or in the **Transport Assessment** and **Staff Travel Plan,** is proposed and the likely residual effect will remain as previously described for each environmental effect.

Summary of Likely Significant Operational Effects

7.121. **Table 7.20** summarises the likely significant effects, identified mitigation measures and the likely residual operational effects identified within this chapter.

Table 7.20: Summary of Likely Significant Operational Effects

Issue	Likely Significant Effect	Mitigation Measures	Likely Residual Effect
Effects of increases in OGV movements upon the local highway network comprising the A2070 (Link 6)	Long-term moderate adverse effect, **Significant**	Embedded implementation of OMP	Long-term moderate adverse effect, **Significant**
Effects of the Development upon the local highway network (Driver Delay) at M20 J10a	Long-term moderate adverse effect, **Significant**	Potential improvements to A20 EB and A20 WB approaches to improve local access to M20 J10a	Long-term minor adverse effect, **Not Significant**

Monitoring

7.122. The impact of operational development traffic is monitored and managed. On arrival at site all goods vehicles will be booked into the onsite vehicle movement recording system (PINC), this records the vehicle registration number (VRN) and time stamps various stages of the paperwork clearance process. The PINC system records the specific location of the HGV, giving the ability to manage the site capacity in real time. Sevington IBF has a number of 'overflow' HGV parking areas which will be opened and used in sequence, these areas are opened in discussion with HMRC at approx. 60% then 70% capacity usage, at these levels available site capacity is monitored frequently in order to ensure all relevant agencies are aware, and to ensure enable decision making on the live situation with drivers encouraged to attend other sites to stop sites reaching full capacity and avoiding the potential for HGVs blocking back onto the local highway network. The PINC system reporting allows information around peaks and troughs on each site to be gathered.

7.123. Should any adverse operational development traffic activity issues be identified through the monitoring regime, further investigations for consideration of appropriate remedial measures and/or enforcement actions will be undertaken.

Assessment of Future Effects

Evolution of the Baseline

7.124. Should the Development not be granted full planning consent by 31 December 2025, all infrastructure except drainage and road infrastructure would be removed from within the Application Site, and the Site reinstated (as required under the SDO), leaving only areas of hardstanding in the once operational plots, together with the internal estate roads, drainage infrastructure and sustainable urban drainage (SuDS), landscaping and areas of open space.

7.125. If full planning permission for the Development is not granted, it is anticipated that the Site would remain vacant, unless a new planning application for an alternative scheme were to be approved and implemented at the Application Site. It is therefore considered that there would be no material change to the future baseline scenario in a 'No Development' scenario, with the cumulative schemes.

Cumulative Effects Assessment

7.126. No cumulative effects beyond those encompassed within the assessment through the inclusion of committed schemes and background growth factors, are anticipated with respect to transport and access.

References

1 Department for Levelling Up, Housing and Communities, National Planning Policy Framework, December 2024

2 Ashford Local Plan 2030, Ashford Borough Council, February 2019

3 Local Transport Plan 5 – Striking the Balance, Kent County Council, December 2024

4 Freight Action Plan for Kent, Kent County Council, June 2017

5 Local Transport Plan 5 – Striking the Balance, Kent County Council, December 2024

6 HMSO (2017). Town and Country Planning (Environmental Impact Assessment) Regulations 2017.