SEVINGTON
INLAND BORDER FACILITY

Department for Environment, Food & Rural Affairs

HM Revenue & Customs

Department for Transport

Environmental Statement

Non-Technical Summary

Client Name:	Department for Transport (DfT), His Majesty's Revenues & Customs (HMRC) and Department for Environment, Food and Rural Affairs (DEFRA)
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Quality Assurance – Approval Status

This document has been prepared and checked in accordance with
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS EN ISO 45001:2018)

Issue	Date	Prepared by	Checked by	Approved by
Final Issue	April 2025	[redacted] EIA Consultant	[redacted] Associate Director	[redacted] Associate Director

[redacted]

Comments

Disclaimer

Contents

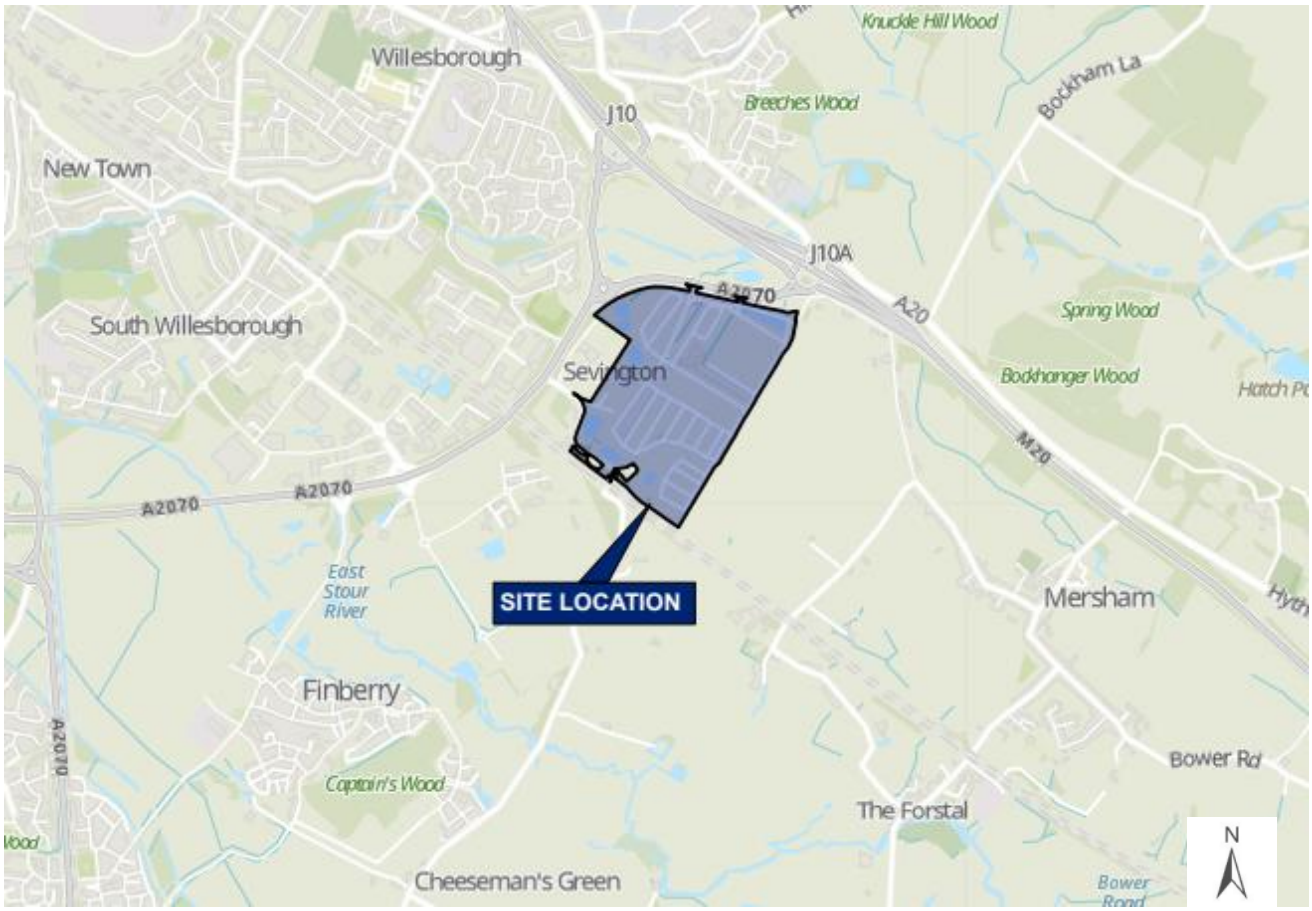
1. INTRODUCTION

This Non-Technical Summary of the Environmental Statement has been prepared by Waterman Infrastructure & Environment Limited ('Waterman') on behalf of the Department for Transport (DfT), His Majesty's Revenue & Customs (HMRC) and Department for Environment, Food and Rural Affairs (Defra), ('the Applicant'). The Applicant is seeking to obtain detailed planning permission for the retention of the existing Inland Border Facility and Border Control Post (the 'IBF') at Sevington near Ashford in Kent, TN25 6GE ('the Application Site'). The Application Site is currently in use for the temporary and operational IBF.

The Application Site is located within a semi-rural area on the outskirts of Ashford. The scheme (hereafter referred to as 'the Development') therefore falls within the administrative boundary of Ashford Borough Council (hereafter referred to as 'ABC').

The location of the Application Site is shown in **Figure 1**.

Figure 1: Location of the Application Site



Planning History

In 2017 Outline Planning Permission (OPP) was granted in 2017 for Stour Park (ref. 14/00906/AS), a mixed-use employment led scheme including alterations of highways, car parking and landscaping. This was followed, in April 2019, by an application (ref. 19/00579/AS) for the first reserved matters (Phase 1A), providing details relating to the access, internal estate roads, open space including landscaping and sustainable urban drainage. Permission for the Reserved Matters was granted in July 2019. A Certificate of Lawfulness of Existing Use or Development (Ref: 19/01099/AS) was granted in August 2019, confirming that development had commenced in relation to outline planning permission 14/00906/AS and associated Phase 1A works approved under reserved matters application reference 19/00579/AS. The Stour Park Scheme (ref. 14/00906/AS) was not brought forward.

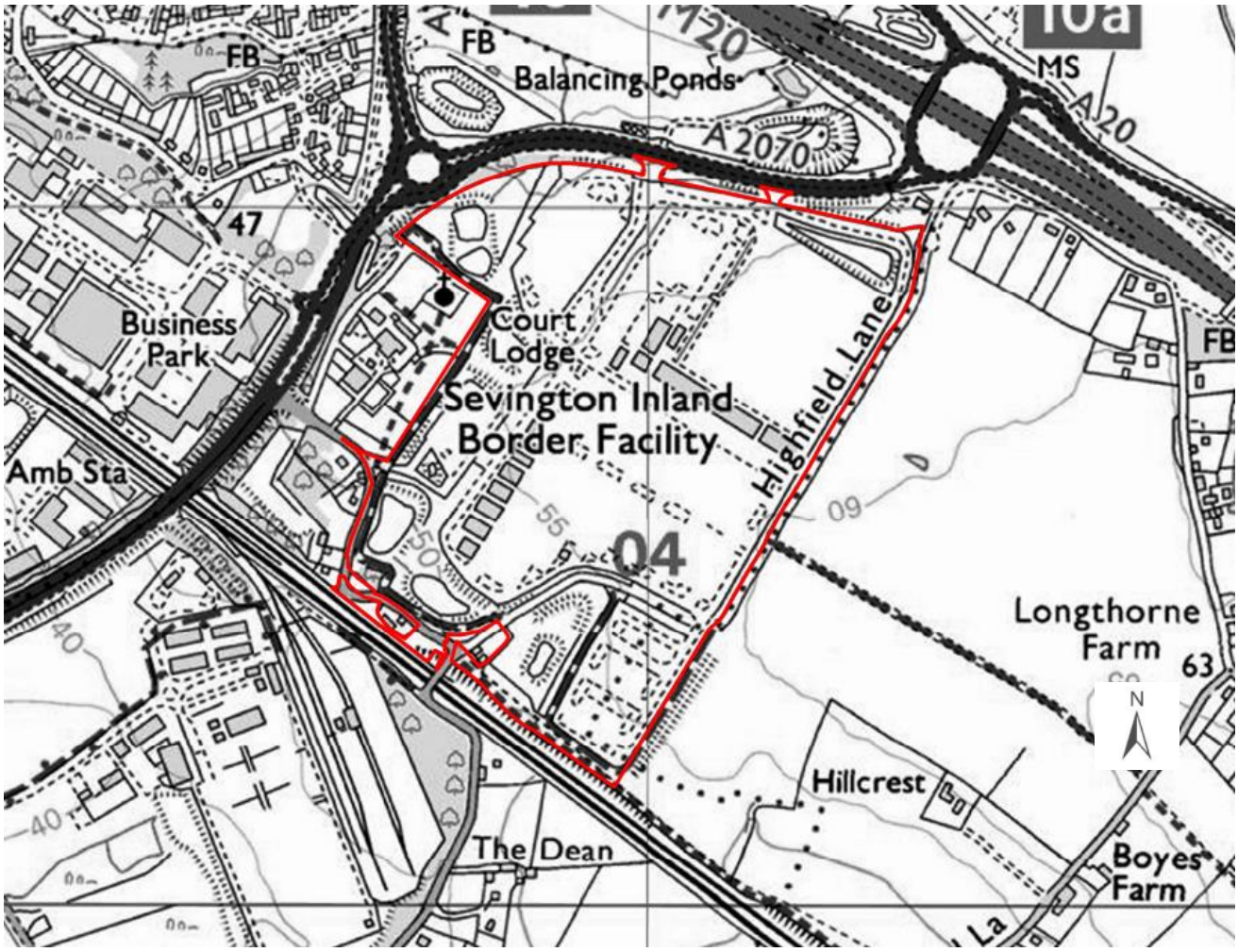
Following the exit of the United Kingdom (UK) from the European Union (EU), a Special Development Order (SDO) was required due to the national importance of the timely delivery of border infrastructure to support customs checks at ports and provide facilities to check goods moving under a Common Transit Convention. An application for the SDO for the site was submitted on 20th November 2020, pursuant to Article 4(1)(a) of the overarching SDO (statutory instrument) and granted under temporary consent on 1st December 2020 for the 'Sevington – Inland Border Facility'.

The SDO was accompanied by a series of environmental studies, including 'An Analysis of the Likely Environmental Effects of the Development Report' (November 2020, and updated in March 2022) as required as per article 4(2)(h) of the Town and Country Planning (Border Facilities and Infrastructure) (EU Exit) (England) Special Development Order 2020. The scheme required Heavy Goods Vehicle (HGV) parking and border checking facilities for His Majesty's Government (HMG), and commenced on the 1 January 2021 up until 31 December 2025.

The Development

The IBF covers an area of approximately 48 hectares (ha). The planning application boundary is shown in **Figure 2**.

Figure 2: Planning Application Boundary



The scheme (hereafter referred to as the 'Development') comprises buildings and structures for border processing purposes comprising 17,277 sqm Gross External Area (GEA), 984 goods vehicle parking spaces (which includes capacity for 240 goods vehicles in 42 entry lanes), 24 refrigerated semi-trailers (19 permanent and 5 reserved) with 24 electric hook-up points, and 357 staff car parking spaces.

To assess the likely significant environmental effects of the Development, an Environmental Impact Assessment (EIA) has been coordinated by Waterman Infrastructure & Environment Ltd ('Waterman'). Waterman, the EIA project managers, are registrants on the Institute of Environmental Management and Assessment (IEMA)'s EIA Quality Mark scheme and have been since its inception in 2009.

The findings of the EIA are reported in an Environmental Statement (ES) which has been prepared to accompany the planning application. The ES describes the likely significant environmental effects of the continued operation of the Development.

This Non-Technical Summary (NTS) provides a summary of the findings of the EIA in non-technical language.

2. ENVIRONMENTAL IMPACT ASSESSMENT METHODOLOGY

EIA is a process which aims to ensure that the likely significant environmental effects of a proposed development (which can be beneficial or adverse) are considered when a planning application is determined. In accordance with the relevant legislative requirements (specifically the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), the 'EIA Regulations')) and best practice guidelines, the EIA was undertaken using established methods and assessment criteria. This involved visits to the Application Site, along with surveys, data reviews, consultation with all relevant statutory authorities, computer modelling, and specialist assessment undertaken by a team of qualified and experienced consultants.

EIA Screening

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

EIA Scoping

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.

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. Following consultation with statutory consultees, a Scoping Opinion was received from ABC on 19 December 2024 (ABC Ref. OTH/2024/2051). 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.
- Transport and Access.
- Air Quality.
- Noise and Vibration.
- Cultural Heritage.
- Ecology and Biodiversity.
- Landscape and Visual Impact Assessment (LVIA).

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.

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.

- Ground Conditions and Contamination – considered within the **Preliminary Risk Assessment**, which accompanies the planning application.
- Light Pollution – assessed within the **External Lighting Assessment**, which accompanies the planning application. The impact from lighting upon amenity and views is considered within the LVIA.
- Waste – considered within the **Operational Waste Management Strategy**, which accompanies the planning application.
- Flood Risk and Drainage – assessed within the **Flood Risk Assessment**, which accompanies the planning application .

Consultation

A number of statutory and non-statutory organisations have been consulted 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).
- Kent County Council (KCC).
- Environment Agency (EA).
- Natural England.
- Historic England.
- National Highways.

Public Consultation

A community engagement exercise was undertaken between 10th October 2024 and 2nd 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 nearby 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

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.

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.

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

The Applicant is seeking full planning permission for the continued operation of the existing IBF by way of a detailed planning application 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. 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.

Approach to Assessment & Reporting Structure of Technical Chapters

Each technical chapter will comprise an introduction, explain the assessment methodology used, and describe the baseline conditions of the Application Site and its surroundings. It will report on the likely significant effects of the Development, any mitigation measures to be implemented as part of the Development, and any likely residual effects and cumulative effects along with any post-mitigation monitoring of environmental conditions required.

Assessment Methodology and Significance Criteria

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.

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.

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.

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) guidelines[1] for ecological impact assessment), this will be explained in the relevant chapter.

[1] Chartered Institute of Ecology and Environmental Management (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine, Version 1.1, September 2018 (Updated September 2019, CIEEM

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**.

Each technical chapter also sets out which effects are considered as 'significant' for the purposes of the EIA, with reference to the technical guidelines.

Baseline Conditions

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.

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 and Land Uses Within the Application Site (Pre-Development Baseline) section of this NTS. Where appropriate to do so, the basis for the baseline conditions for the pre-development Application Site has utilised information and data from the 2020 SDO.

The baseline conditions relevant to each environmental issue are summarised in this section of each chapter, drawing upon the analysis of Phase 1A of the Reserved Matters Application and SDO data along with evaluating outcomes of desktop studies, evidence reviews and the results of site surveys.

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.

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

Each chapter presents the assessment of the likely significant effects of the Development during demolition and construction and once the Development is complete and operational. It is presented in tabular form, providing a summary of each environmental effect and identifying the type, duration, spatial extent, scale and significance of each effect. These are further defined in **Table 1**.

Table 1: Effect Typologies and Descriptions

Effect Typology	Effect Descriptor	Definition
Nature of Effect	Direct (Primary)	An effect without intervening factors (e.g. the removal of trees and vegetation to allow construction of the Development).
	Indirect (Secondary)	An effect not directly caused by the Development (e.g. changes to the pattern of traffic movements across the road network as a result of a new road being constructed).

Effect Typology	Effect Descriptor	Definition
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 generation of construction jobs, or noise and dust emissions from construction activities).
	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).
Type of Effect	Adverse (i.e. Negative)	A harmful or unfavourable effect (e.g. the loss of trees to allow the construction of new buildings).
	Beneficial (i.e. Positive)	A favourable or advantageous effect (e.g. the creation of jobs as a result of proposed construction works).
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 Site).
	Local	Effects experienced within the ABC area.
	Regional	Effects experienced within the broad geographic area of Ashford
	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).

Mitigation Measures and Likely Residual Effects

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 are therefore included in the pre-mitigation assessment of the likely significant effects.

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.

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. **Section 12: Summary of Residual Effects** provides a combined summary from each of the technical chapters.

Monitoring

Post mitigation monitoring of environmental conditions is proposed where relevant within the technical chapters and is summarised in the **Next Steps** section.

Cumulative Effects

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.

Intra-development effects

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 by 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 **Section 13: Cumulative Effects**.

Inter-development effects

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.

The schemes listed in **Table 2** (hereafter referred to as 'the Cumulative Schemes') were identified for consideration within the inter-development effects assessment.

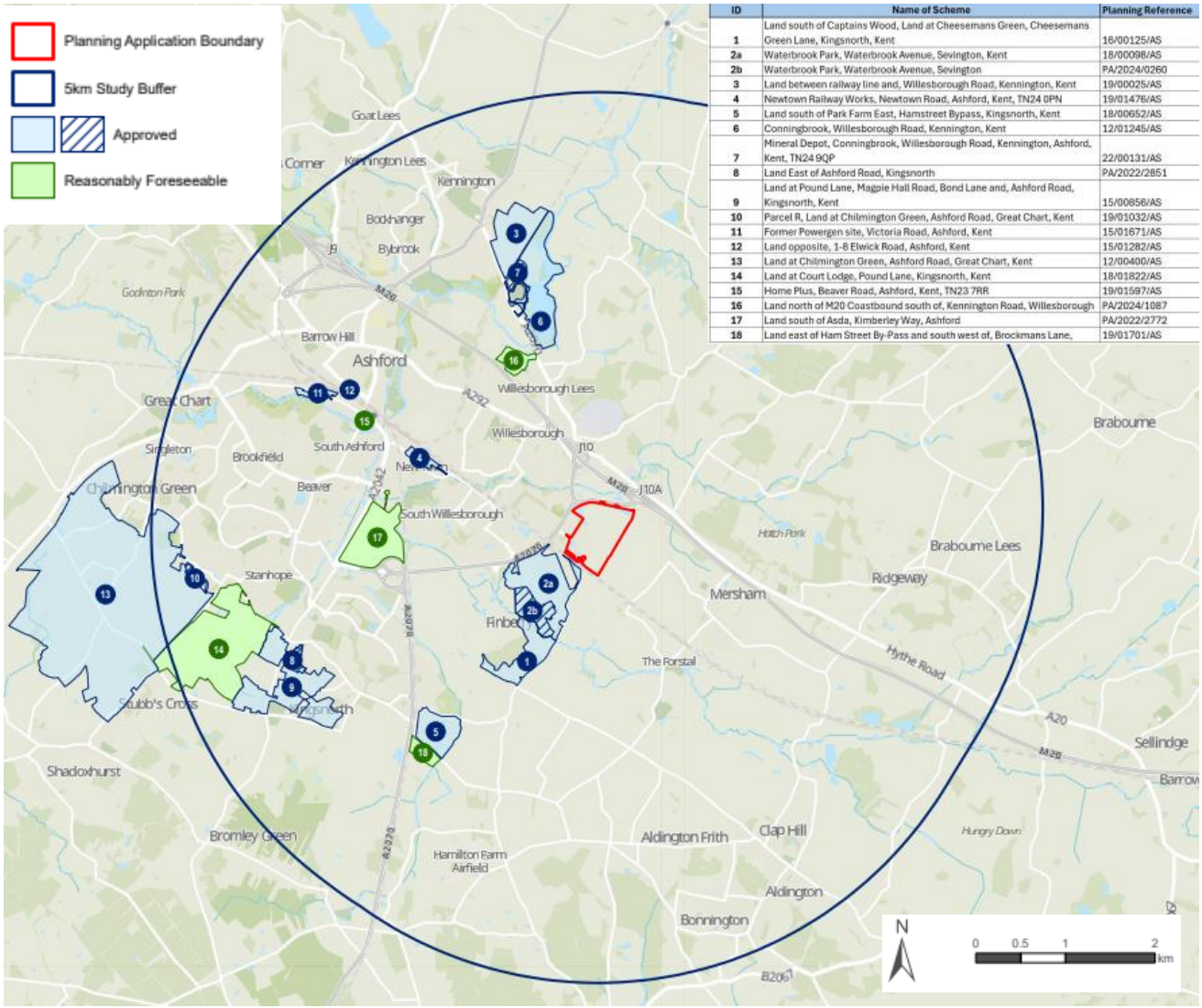
Table 2: Schemes Proposed for Consideration within the inter-Development Effects Assessment

	Reference and Status	Site Name/Address	Distance (m) and Direction	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
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, services and facilities.
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; 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.
4	19/01476/AS Approved 01/09/2020 - Development underway	Newtown Railway Works, Newtown Road, Ashford, Kent, TN24 0PN	**1.7 (W)**	Detailed application for a mixed-use development comprising;- film/ TV Studios with associated post-production offices and workshop and media village (18,845 sqm) (Use Class B1); a hotel (Use Class C1) and circa 62 serviced apartments (Use Class C3); a multi-storey carpark.
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, 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, infrastructure and landscaping.
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.

	Reference and Status	Site Name/Address	Distance (m) and Direction	Summary Planning Description
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 and transport infrastructure.
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
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: Full and detailed application for plots 1 and 2 comprising: erection of 400 dwellings, a retail kiosk/cafe unit (Use class A1/A3) and; Outline application for plots 3, 4 and 5 comprising: demolition of existing buildings/structures and erection of up to 260 dwellings
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, up to 10,000 m² (GIA) of Class Bl use; up to 9,000 m² (GEA) of Class Al 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 Dl) up to 7,000 m² (gross external floorspace); Leisure Uses (class D2) up to 6,000 m² (gross external floorspace);
14	18/01822/AS Reasonably Foreseeable	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 (upto 650 sqm D1).
15	19/01597/AS Reasonably Foreseeable	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, B1, D1 and D2) and roof top restaurant, with associated access and landscaping.
16	PA/2024/1087 Reasonably Foreseeable	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	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	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.

The locations of the cumulative schemes are shown on **Figure 3.** Likely inter-development effects between the Development and the Cumulative Schemes during both demolition and construction and once the Development is complete and operational have been assessed within the technical topics contained in the ES (Chapters 7 to 11 and ES Volume 4: LVIA) and are summarised in Sections 7 to 11 of this NTS.

Figure 3: Inter-development Cumulative schemes within 1km



ID	Name of Scheme	Planning Reference
1	Land south of Captains Wood, Land at Cheesemans Green, Cheesemans Green Lane, Kingsnorth, Kent	16/00125/AS
2a	Waterbrook Park, Waterbrook Avenue, Sevington, Kent	18/00098/AS
2b	Waterbrook Park, Waterbrook Avenue, Sevington	PA/2024/0260
3	Land between railway line and, Willesborough Road, Kennington, Kent	19/00025/AS
4	Newtown Railway Works, Newtown Road, Ashford, Kent, TN24 0PN	19/01476/AS
5	Land south of Park Farm East, Hamstreet Bypass, Kingsnorth, Kent	18/00652/AS
6	Conningbrook, Willesborough Road, Kennington, Kent	12/01245/AS
7	Mineral Depot, Conningbrook, Willesborough Road, Kennington, Ashford, Kent, TN24 9QP	22/00131/AS
8	Land East of Ashford Road, Kingsnorth	PA/2022/2851
9	Land at Pound Lane, Magpie Hall Road, Bond Lane and, Ashford Road, Kingsnorth, Kent	15/00856/AS
10	Parcel R, Land at Chilmington Green, Ashford Road, Great Chart, Kent	19/01032/AS
11	Former Powergen site, Victoria Road, Ashford, Kent	15/01671/AS
12	Land opposite, 1-8 Elwick Road, Ashford, Kent	15/01282/AS
13	Land at Chilmington Green, Ashford Road, Great Chart, Kent	12/00400/AS
14	Land at Court Lodge, Pound Lane, Kingsnorth, Kent	18/01822/AS
15	Home Plus, Beaver Road, Ashford, Kent, TN23 7RR	19/01597/AS
16	Land north of M20 Coastbound south of, Kennington Road, Willesborough	PA/2024/1087
17	Land south of Asda, Kimberley Way, Ashford	PA/2022/2772
18	Land east of Ham Street By-Pass and south west of, Brockmans Lane,	19/01701/AS

3. Land Uses and Sensitive Receptors

The Application Site is centred on National Grid Reference TR 03976 40758 and is located within a semi-rural area on the outskirts of Ashford, with a mixture of residential and commercial land uses located to the north and west of the Application Site but with agricultural land use to the south and east. It lies within the National Character Area of Wealden Greensand.

The Application Site is bound by:

- The A2070 Link Road and M20 motorway (M20 Junction 10a), to the north.
- Highfield Lane and Kingsford Street to the east and north-east respectively.
- Highfield Lane and Church Road, to the south.
- Church Road, St Marys Church and A2070 (Bad Munstereifel Road), to the west.

Ashford Green Corridors Local Nature Reserve (LNR) lies 50m to the West, Hatch Park Site of Special Scientific Interest (SSSI) lies approximately 500m to the east and Hatch Park Grade II Listed Registered Park and Garden is situated approximately 500m north-east of the Application Site. Two non-statutory sites, Willesborough Lees and Flowergarden Wood Local Wildlife Sites (LWS) and South Willesborough Dyke LWS, are located 900m to the north and 1km to the south-west of the Application Site respectively.

Topography

A topographic survey by Plowman Craven (November 2024) shows that the levels within the Application Site range 47.43m AOD in the south-west to 61.31m AOD in the south.

Historical Land Uses

An examination of historical data pertaining to the Application Site reveals that the historic land use has remained largely as undeveloped agricultural land (arable farmland). Church Road and Highfield Lane are historic routes, which are partially within the Application Site.

Land Uses

As the application is seeking permission for the continued use of the current IBF, the description of both the existing uses within the Application Site and the Development is the same.

Land Uses Within the Application Site (Present Day, 2024-2025)

The Application Site is currently in use for the operational IBF under temporary consent (Plates 1-4 of **Figure 4**). The Application Site is a secure facility bound by fencing around the perimeter along with landscape bunds which are present at select locations to provide visual and acoustic screening of the IBF and its operations. The Application Site comprises a mix of landscaped areas and bunds, featuring tree planting, drainage ponds and ditches, together with hardstanding (Plate 4 of **Figure 4**), notably internal estate roads and areas for vehicle parking for staff and HGVs (at ground level). The staff car park is located to the west of the Application Site and is accessed off Church Road (Plate 3 of **Figure 4**). HGV and Goods vehicle access is located to the north via the A2070 Link Road. Buildings within the Application Site (Plates 1 and 2 of **Figure 4**) are predominantly located in the south-western central (HMRC sheds) and the central north-eastern (Defra Border Control Post) parts of the Application Site. Ancillary buildings utilised for security, storage and utilities can be found throughout the wider Application Site.

Figure 4. Existing photographs of the Application Site

Plate 1

Plate 2

Plate 3

Plate 4

Land Uses Within the Application Site (Pre-Development Baseline)

A 'pre-development' baseline has been identified as comprising the Application Site with the implementation of Phase 1A of the Reserved Matters Application (Ref. 19/00579/AS), i.e. those site conditions in the absence of the IBF. This is considered to present a reasonable worst-case baseline for the purpose of the assessment. Each technical chapter sets out the relevant baseline conditions. On the basis of the Phase 1A works being implemented, the Application Site (pre-development) would comprise:

- a mostly vegetated boundary, comprising trees and tree belts, hedgerows and shrubs, together with areas of grassland;
- areas of hardstanding, limited to the access road, internal estate / circulation roads and pathways;
- areas of open space and landscaping, comprising grassland and wildflower meadow, areas of ornamental planting;
- drainage features, in the form of ponds, wetland margins and drainage ditches, interspersed within the areas of open space and landscaping;
- provision for seven development plots, which are clear of any vegetation;
- additional ecological features are present in the form of bird and bat boxes, together with reptile and invertebrate hibernacula and logpiles;

A section of the Old Mill Stream is conveyed through the north-east part of the Application Site via ditches and culverts. A high-pressure gas main runs north to south through the centre of the Application Site; this includes a 9m easement on either side of the pipeline. There are several access points along the boundary of the Application Site, which connect to the surrounding highway network.

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

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

Existing Land Uses Surrounding the Application Site

As can be seen in **Figure 5**, the area surrounding the Application Site to the north consists of the A2070, a patch of arable land containing Old Mill Stream, the M20 motorway (and Junction 10a), which runs south-east to north-west leading to areas of open space, agricultural land and residential properties beyond, including the William Harvey Hospital.

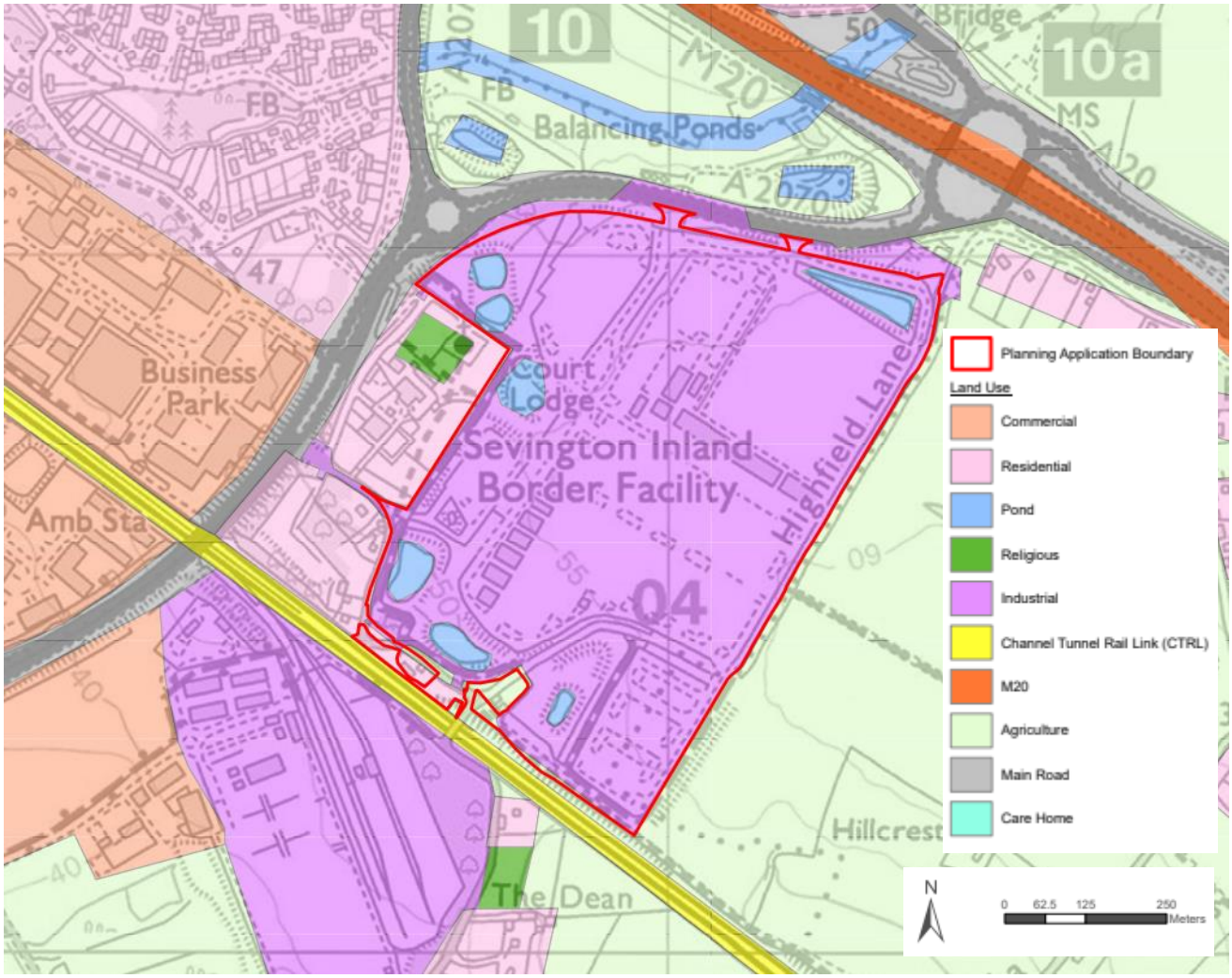
The existing land use to the east is semi-rural dominated by arable farmland. Highfield Lane, which connects to Kingsford Street and Blind Lane (Mersham) leads to residential dwellings (some of which are Listed) and includes several agricultural holdings (the nearest of which is Hillcrest Farm).

To the south, Church Road and the Channel Tunnel Rail Link (CTRL) form the southern extent of the Application Site. There are isolated residential properties along Church Road (some of which are Listed). Beyond the railway lines, the existing land use is predominantly agricultural land. Public Rights of Way (PRoW) connect the land surrounding the Application Site with Bridleway AE673 connecting Highfield Lane to Blind Lane to the southeast of the Application Site, while footpath AE344 connects Blind Lane to Church Road on the north side of the railway lines to the southwest. Restricted Byway AE350 connects Church Lane and Waterbrook Avenue, to the south, via a railway bridge (Cheeseman's Green Lane). To the southwest of the Application Site, a Network Rail (works Delivery) site and the Ashford International Truck Stop is located. Further southwest are residential properties (Finberry), and isolated properties along Cheeseman's Green Lane (some of which are Listed).

The existing land use and character of the area to the west is a mixture of commercial and light industrial leading to areas of residential and commercial land uses further north and west. The west of the Application Site contains the Church of St Mary, a Grade I Listed Building, and an agricultural holding (Court Lodge, a Grade II Listed Building), together with a small number of residential properties along Church Lane. Beyond the A2070 (Bad

Munstereifel Road) is Willesborough, which includes a mix of residential, commercial and light industrial uses (Ashford Retail / Business Park and Orbital Park). A Scheduled Monument (Boys Hall) is located to the south of Ashford Business Park, on the south side of the railway.

Figure 5. Existing Land Uses of the Application Site and Surrounds



Future Land Uses

The Applicant proposes the continued use of the existing IBF operations within the Application Site.

The likely changes in the surrounding area irrespective of the Development are referred to in this ES as the 'Future Baseline'. The area surrounding the Application Site has the potential to change as a result of the implementation of other schemes unconnected with the Development. This includes the consented schemes identified for the purposes of the **Residual Effects and Effect Interactions** section. Future land uses surrounding the Application Site would predominantly comprise residential schemes and mixed residential and commercial schemes which are illustrated by the cumulative schemes in **Figure 3**.

Sensitive Receptors

A sensitive receptor is an existing (or under some circumstances, future) feature which has the potential to be impacted by a proposed development. Such impacts could be either adverse or beneficial, and sensitive receptors have the potential to be affected by more than one impact. Receptors can be human (e.g. local residents, or users of schools and hospitals), economic (e.g. the local labour market or local economy) or environmental (such as protected habitats / species, nearby watercourses, or designated sites).

The impact(s) of the Development on sensitive receptors within the surrounding area forms the primary basis of the EIA reported within this ES, and as such, the definition of sensitive receptors is an important aspect of the assessment process.

An appraisal has been undertaken to identify those receptors that should be considered as being sensitive to the operation of the Development. These were identified through desk studies and site visits conducted by technical specialists, and consultations with statutory and non-statutory bodies. Potential effects on these receptors have been considered as part of the EIA.

4. THE DEVELOPMENT

Development Overview

The Applicant is seeking planning permission for the Development by way of a detailed planning application. The description of the Development, as defined by the planning application form, is provided as follows:

> *"Retention of the existing buildings, Goods Vehicle parking spaces, entry lanes, refrigerated semi-trailers, staff car parking spaces, access, site infrastructure, utilities, hardstanding, landscaping and ancillary facilities and associated works; and ongoing use of the site for an Inland Border Facility and Border Control Post, operating 24 hours per day, seven days per week"*

Permission is being sought for the retention of 17,277 sqm GEA (gross external area) (16,348 sqm GIA – gross internal area) Sui Generis land use classification across 23 buildings, ancillary cabins and security huts, associated landscaping, and hardstanding comprised of 24 refrigerated semi-trailers (including 19 permanent and 5 reserved) with 24 electric hook-up points, 42 entry lanes, 2 electric vehicle (EV) charging points, 357 staff car parking spaces, 984 HGV parking spaces (plus 240 in the 42 entry lanes) and 60 staff cycle parking spaces.

The Development primarily consists of industrial units used for border processing and inspection of goods, with additional office, welfare, plant, and storage facilities. It serves both the Defra Border Control Post (BCP) and the HMRC Inland Border Facility (IBF).

The Defra BCP, located along the eastern side of the Application Site, is designated for inspecting goods arriving from third countries. The Defra BCP facilities include offices, inspection sheds (A to E), and refrigerated storage trucks/semi-trailers. External to the east, there is HGV parking, overflow spaces, and swim lanes which service both the BCP and the IBF.

The HMRC IBF, located on the western side of the site, handles import/export goods processing, with office facilities for paperwork inspection, HMRC IBF inspection sheds, and welfare units. The southern section of the Application Site includes an HGV car park and waiting area, managing traffic flow for arriving vehicles.

Additional HGV parking areas, referred to as 'Tango' and 'Romeo', are located at the northern and southern ends of the Application Site and are used to hold goods vehicles (including HGVs) as part of the wider Kent Resilience Strategy to relieve pressure on the strategic road network in the event that there is disruption at the Port of Dover or Eurotunnel .

The Application Site perimeter is bordered by low-maintenance amenity grassland, and the Public Right of Way (PRoW) AE639, which has been diverted and upgraded to a bridleway to accommodate equestrians and cyclists. The Application Site also features seven Sustainable Urban Drainage System (SuDS) ponds, located along the east, north, south and west of the site. A viewing corridor runs from northwest to southeast, maintaining visibility between two Grade I listed churches, St Mary's in Sevington and St John the Baptist in Mersham.

Building Heights, Massing and Materials

The Development includes buildings ranging from 57.79m to 68.6m above ordnance datum (AOD), with the tallest being a two-storey structure (9.1m in height) located at the eastern end of the Application Site. The buildings are constructed using corrugated iron sheeting and cladding, featuring a combination of horizontal and vertical profiled metal panels in light grey, dark grey, and white. The use of lighter greys helps reduce visual

bulk, while horizontal grey bands and window openings on office walls further break up the long exterior, minimizing the visual impact of the building elevations.

Figure 6. Sevington Inland Boarder Facility Site Layout

Pedestrian, Cycle and Vehicular Access and Circulation

All goods vehicles and HGVs arriving at the Application Site must enter via a left turn from the M20 onto A2070 Link Road, using a one-way circular road system that exits at a separate lane in the north. Staff access is via A2070 Bad Munstereifel Road, turning onto Church Road, with 357 car parking spaces, 60 cycle spaces, 2 spaces for EV charging and 10 for blue badge / accessible parking provided for employees. The Application Site offers up to 1,224 HGV parking spaces, split between the east (Defra BCP HGV parking, overflow, and swim lanes) and west (HMRC IBF HGV parking, overflow, and waiting area). Additionally, 19 refrigerated semi-trailers are available near the Defra BCP sheds with 5 reserved (24 total), with 24 electric charging points for refrigerated vehicles in total, therefore 5 hook-up points are available for further vehicles. Maintenance and delivery vehicles enter through the main entrance off A2070 Link Road.

Landscape Proposals and Ecological Enhancement

The landscape proposals at the Application Site will be enhanced to align with the approved Landscape and Ecological Management Plan (LEMP) for the Inland Border Facility (IBF). The goal is to integrate the Application Site with its surroundings, establish effective landscape buffers, and improve habitat value and biodiversity. Native planting, including trees, thickets, and species-rich grasslands, will extend the surrounding

landscape's character into the site. To improve screening, mixed species thicket planting will be added to the north near the A2070, enhancing privacy for nearby residential properties and offering aesthetic value to pedestrians. Additional tree planting is proposed around the pond in the southwest corner for further screening of residential properties on Church Road. Low shrub and thicket planting will also be introduced along a diverted public right of way. These enhancements aim to promote ecological value while providing visual and functional benefits.

Lighting Strategy

There is an existing lighting strategy for the Development, which has been reviewed as part of this planning application. An external lighting survey has been undertaken which has established that the lighting levels at the Application Site boundaries are acceptable, however improvements would be required to address direct glare and some upward light spill. Lighting changes, proposed to avoid nuisance and any ongoing negative effects, comprise fitting all existing external lighting with baffels (to remove the impact from direct glare), replace existing lights to lower wattage (to reduce indirect light spill), and to consider lighting controls, such as web/remote switching to reduce the lumen output (dimming) and whether the lights are switched on or off.

The proposed lighting will be designed with reference to the relevant British Standards and Chartered Institute of Building Services Engineers (CIBSE) Guidance.

With the application of the recommendations, the design will minimise visible light, light spill and upwards light, particularly in or adjacent to areas of ecological importance, whilst ensuring a safe and secure environment for all users.

Flood Risk, Drainage and Potable Water

A Flood Risk Assessment (FRA) and Drainage strategy were submitted with the SDO application, confirming no significant flooding risks but potential surface water run-off and groundwater risks. The Application Site is in a surface water Nitrate Vulnerable Zone (NVZ) but not in a Drinking Water Protected Area or Source Protection Zone. Drainage at the Sevington Inland Border Facility (IBF) and Border Control Post (BCP) includes both foul and surface water systems, managed privately by the landowner. The surface water system uses Sustainable Urban Drainage Systems (SuDS) to control discharge into two culverts and Old Mill Stream. No changes are proposed to the current drainage strategy. Foul waste from welfare facilities and the BCP is managed by Southern Water, which operates public sewers and an off-site pumping station. The BCP uses a separate drainage system for wastewater from animal inspections, which is tested and removed off-site. Potable water is supplied by Southern East Water, with efforts to minimize water usage by utilising rainwater collection tanks with aerated taps to assist in firefighting at the Application Site.

Energy and Sustainability Strategy

The energy strategy for the Development includes a Variable Refrigerant Flow (VRF) system for heating and cooling, along with natural ventilation for the offices. Mechanical ventilation with heat recovery is used in two of the ten bays of the HMRC offices. Heating in corridors is provided via fixed full-electric oil heaters. The Defra inspection bays in the sheds are equipped with extract fans only, while other shed areas are served by an Air Handling Unit (AHU) attached to a Direct Expansion (DX) system for both cooling and heating. Some areas have only an AHU with Mechanical Ventilation with Heat Recovery (MVHR). The Defra sheds have direct electric hot water with storage, and the undressing areas are provided with small storage water heaters. The Defra sheds also feature highly efficient lighting efficacy. Hot water for other areas is provided through direct electric instantaneous under-sink heaters. All areas are equipped with low-energy LED lighting, with occupancy sensing in most occupied spaces.

The Development incorporates sustainable features like modular construction, sustainable drainage systems, and responsible material sourcing. It promotes sustainable travel with EV charging points, cycle parking, and a staff travel plan. Waste management emphasizes recycling and energy recovery, while taking measures to mitigate noise, air quality, and lighting impacts. The project is designed to enhance energy efficiency, reduce environmental impact, and contribute to long-term ecological benefits, supporting a low-carbon future. Minimal

on-site work will still incorporate energy-efficient and sustainable practices to improve the Development's overall environmental performance.

Further details are available in the **Energy Statement** and the **Sustainability Strategy**, which accompany the planning application.

Waste

The Application Site does not treat or process any waste on-site. Waste generated includes non-hazardous types such as mixed recyclables (paper, cans, plastics), glass, food waste, sanitary/hygiene waste, and residual waste. Hazardous waste, such as used spill kits and batteries, is also produced. Waste management targets aim for less than 5% landfill and at least 70% recycling. During inspections, if loads are held and cannot be resolved, they are disposed of. Waste from animal products, by-products, plants, and clinical sharps is incinerated, while liquid waste from animal holding areas is treated off-site. Waste collections are organised by a contractor, with specialist and hazardous waste collected on an ad hoc basis. On-site operatives notify the contractor, and the waste is destroyed within five days of notice.

5. ALTERNATIVES

Development Context

The land, covered by the current Application Site, had been previously identified as a key strategic development site within the ABC Core Strategy (2008)[2] and Urban Sites and Infrastructure Development Plan Document (DPD) (2012)[3], and was allocated as employment land for B1 light industrial, B2 and B8 uses.

The Application Site previously benefitted from outline planning permission (ref. 14/00906/AS), obtained by the previous owner in relation to the land covered by the current Application Site, which permitted the following:

'*Development to provide an employment led mixed use scheme, to include site clearance, the alteration of highways, engineering works and construction of new buildings and structures of up to 157,616 sq. m ... together with ancillary and associated development including utilities and transport infrastructure, car parking and landscaping*'.

Following the outline approval of the previous scheme, the Core Strategy and DPD were both superseded upon the adoption of the current Ashford Local Plan (2019)[4]. The employment development allocation was not carried forward pursuant to the new Local Plan (2019), on the basis that outline permission had been granted for employment development over the Application Site.

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

Alternatives

Schedule 4 of the EIA Regulations identifies the following types of alternatives:

- Do nothing / No development scenario;
- Alternative sites; and
- Alternatives uses.

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2 Ashford Borough Council (2008) Core Strategy, Adopted July 2008. Available online: cd7-14-adopted-core-strategy.pdf [Accessed: 27 January 2025]

3 Ashford Borough Council (2012) Urban Sites and Infrastructure Development Plan Document (DPD), Adopted October 2012. Available online: https://www.ashford.gov.uk/media/zf2llmck/urban-sites-and-infrastructure-dpd.pdf [Accessed: 27 January 2025]

4 Ashford Borough Council (2019) Ashford Local Plan, Adopted February 2019. Available online: https://www.ashford.gov.uk/media/jw3nbvq1/adopted-ashford-local-plan-2030.pdf [Accessed 27 January 2025]

Do Nothing / No Development Scenario

Do Nothing / No Development Scenario (Reinstatement Works)

Under the SDO, temporary planning permission for the Application Site's use as an inland border facility (IBF) is granted until 31 December 2025, with reinstatement required by 31 December 2026. A "Do Nothing / No Development" scenario is considered if the IBF ceases to operate. By 30 June 2025, a reinstatement plan must be submitted. The plan will include the removal of all infrastructure such as buildings, fencing, and lighting, with certain elements like hardstanding areas, estate roads, sustainable drainage systems, and landscaping retained. An indicative Long-term Enhancement Plan, submitted with the SDO, details the framework for landscape planting, additional environmental improvements, and increased public access, including heritage trails and information boards highlighting the site's heritage and biodiversity.

Do Nothing / No Development (Extant Stour Park)

Consideration has been given to a 'Do Nothing / No Development' scenario in which the previously consented Stour Park scheme is built out. Whilst this permission has since lapsed, with no prospect of being built out, it may be possible that in the future a similar scheme could be submitted.

As requested within the EIA Scoping Opinion, a comparison of the likely residual effects from the previously consented Stour Park scheme and IBF Development was undertaken and demonstrates that the likely residual effects associated with both schemes are broadly comparable.

Alternative Sites

Due to confidentiality, specific site selection details cannot be provided, but the Application Site is strategically located next to the M20, ensuring easy vehicle access and reducing journey times, emissions, and noise. While other temporary sites were established across the UK, no permanent IBF has been pursued in the South East, as the Application Site's location is considered the most strategic and efficient.

Alternative Uses

The Applicant has not considered alternative uses of the Application Site or alternative layouts for the Development. The IBF has been specifically designed and adapted to best meet the needs of the current operations and operators.

Previous iterations of the Development are not available and are subject to confidentiality.

6. SOCIO ECONOMICS

The Socio-Economic assessment considers the impact of the Development to Ashford's economy, namely the impact on jobs, employment, economic output (measured using Gross Value Added (GVA)) and workforce expenditure.

The Development will support 819 full-time equivalent (FTE) direct jobs, providing a permanent, long-term, moderate beneficial effect on jobs in Ashford, which is considered **significant**. No mitigation is necessary as the effect is **beneficial**.

It is anticipated that 483 of the 819 FTE direct jobs will be net direct jobs to Ashford, with a further 121 net indirect jobs supported through supply chain linkages. In total, the Development's net additional employment effect to Ashford is 604 FTE jobs providing a **permanent, long-term, minor beneficial effec**t on employment in Ashford, which is considered **not significant**. No mitigation is necessary as the effect is **beneficial, significant**.

The net additional jobs 604 FTE jobs to Ashford is estimated to generate £23.6 million in GVA per annum, representing 0.7% of total GVA generation in Ashford. On this basis, the Development will provide a **permanent, long-term, minor beneficial effect** on economic output in Ashford, which is considered **not significant**. No mitigation is necessary as the effect is **beneficial**.

Whilst there is the potential for the Development's workforce to support the local economy through spending on daily subsistence, the Development is on a secure site, restricting the ability for workers to easily leave and re-enter the Application Site, thereby limiting the potential for workers to spend in local shops. On this basis, the

Development will provide a **permanent, long-term, negligible effect** on workforce expenditure in Ashford, which is considered not significant. No mitigation is necessary as the effect is **beneficial**.

7. TRANSPORT AND ACCESS

The assessment of environmental effects from a transport planning perspective is based on a review of existing highway and transport networks, observed traffic flows, accident data, public transport services, and junction modelling. The assessment follows the Guidelines for the Assessment of Road Traffic (GEART), published by the Institute of Environmental Management and Assessment (IEMA), and considers the Transport Assessment and existing Staff Travel Plan submitted separately with the planning application.

The Application Site is in a highly accessible location, close to the Strategic Road Network (SRN) comprising the M20 and A2070, southeast of Ashford, Kent. It operates under a strict access strategy, requiring HGVs to use M20 Junction 10a and follow left-turn in / right-turn out arrangements at the A2070 main site access. Under its temporary SDO approval, the Application Site has significantly improved active travel connections with Ashford, including enhanced pedestrian and cycling infrastructure and improved crossing facilities on key surrounding roads.

Since the IBF is already built and operational, construction impacts were scoped out of the ES. With no demolition or construction involved, these elements were not considered further. The operational phase is expected to have limited significant effects, with only minor increases in traffic flows on most local and wider roads. However, the A2070 link serving the Application Site will see a significant increase in HGV traffic compared to the pre-development baseline, though receptor sensitivity on this link is low.

The Development is supported by an Operational Management Plan (OMP), which includes a Traffic Management Plan, Signage Strategy, and Staff Travel Plan to guide site operations. The Development has already delivered highway improvements for vehicle access and enhanced active travel infrastructure, benefitting both site users and the local community by improving connectivity with Ashford and the surrounding area.

The assessment indicates that by 2026, M20 Junction 10a will be near capacity on the A20 Eastbound approach during the AM and PM peak hours. Development-related traffic will exacerbate queuing and delays on both the A20 Eastbound and Westbound approaches. Potential mitigation measures, subject to agreement with Kent County Council and National Highways, may be required to alleviate congestion at this junction.

8. AIR QUALITY

The assessment of the potential impacts to air quality from the operational Development has been established in accordance with published guidelines and best practice. To inform the assessment, baseline conditions were established at and around the Application Site from the review of the ABC's Air Quality Annual Status Reports and monitoring data.

A detailed modelling exercise has been undertaken to assess likely effects on local air quality associated with changes to road traffic from the Development. The modelling indicates levels of nitrogen dioxide and particulates would not exceed nationally accepted limits at any of the nearby residential properties in 2026. It is concluded that the effect of the Development on levels of nitrogen dioxide and particulates would both be **negligible (not significant)**.

9. NOISE AND VIBRATION

The assessment of the operational noise effects from the Development has been established in accordance with published guidelines and best practice.

Noise from key operational sources were quantified through noise survey and input into a 3D CadnaA noise model to allow prediction of operational noise at the nearest sensitive receptors. During the survey the dominant operational noise was noted to be movement of HGVs around the Application Site. Noise from fixed plant and break-out from buildings was noted to be **not significant** compared to that arising from HGV movements around the Application Site.

Operational noise assessments were based on the highest hourly HGV movements and also the maximum hourly HGV movements during both the day and night-time periods. This data was established from data

recorded at the IBF between January to November 2024. The assessment took account of screening provided by the existing acoustic fences on the IBF site.

During the daytime period operational noise emissions were assessed to be **negligible** based on highest hourly and maximum hourly HGV movements. This in part is due to prevailing 2022 ambient noise levels without IBF contribution and distance attenuation and screening to IBF operational noise.

During the night-time period, when ambient noise levels are lower, operational noise emissions were assessed to be predominantly **negligible** but with potential for some **minor adverse effects**.

Changes in road traffic noise, as a result of the Development, are less than 1dB on all road links except for the A2070 north of the Application Site (east of the site access) where the predicted change in road traffic noise is less than 2dB. Noise from the M20 is the dominant source at the nearest receptors to this section of the A2070. From analysis using 3D CadnaA noise modelling software, it is considered the change in road traffic noise along this road link is unlikely to be realised at these receptors due to the dominance of M20 road traffic noise and therefore the change is considered to be **not significant**.

10. Cultural Heritage

A Cultural Heritage assessment has been undertaken in accordance with published guidelines and best practice, to examine the potential impact and likely effects of the Development on built heritage (above ground) remains within the Application Site. These are parts of the historic environment which are considered to be of high sensitivity/value because of their historic, archaeological, architectural or artistic interest. The assessment considers the magnitude of change (impact) of the Development upon the significance of heritage assets within and surrounding the Application Site.

The Development results in a permanent urbanising effect that changes the rural character of the area. While it is acknowledged that this character was changed to a degree under the Reserved Matters Application, Phase 1A (ref. 19/00579/AS) (for estate roads, landscaping and drainage), the landscaping and attenuation ponds built as part of this work did not entirely remove this rural character. Due to the potential impacts to built heritage assets as a result of the continued use and operation of the Sevington IBF, it is considered that there is one potential heritage receptor affected by the Development, the Church of St Mary. Therefore, the effect on built heritage receptor, the Church of St Mary, would be **moderate adverse** and therefore **significant.**

11. Ecology and Biodiversity

Habitats present on the Application Site are those typical of the urban environment, with landscaped areas, including seven ponds, present within the Application Site boundary.

In order to avoid, minimise or offset potential adverse effects, embedded mitigation has been incorporated into the design of the Development as part of the existing Landscape Ecological Management Plan (LEMP). Additional mitigation measures have also been proposed, within a Landscape Management and Maintenance Plan (LMMP), for an additional 5 years. Landscape Maintenance and Management Plan (LMMP), with LEMP appended.

There would be **no significant adverse residual effects** arising from the continued operation of the Development as a result of the continued implementation of the LEMP alongside the additional mitigation measures within the LMMP.

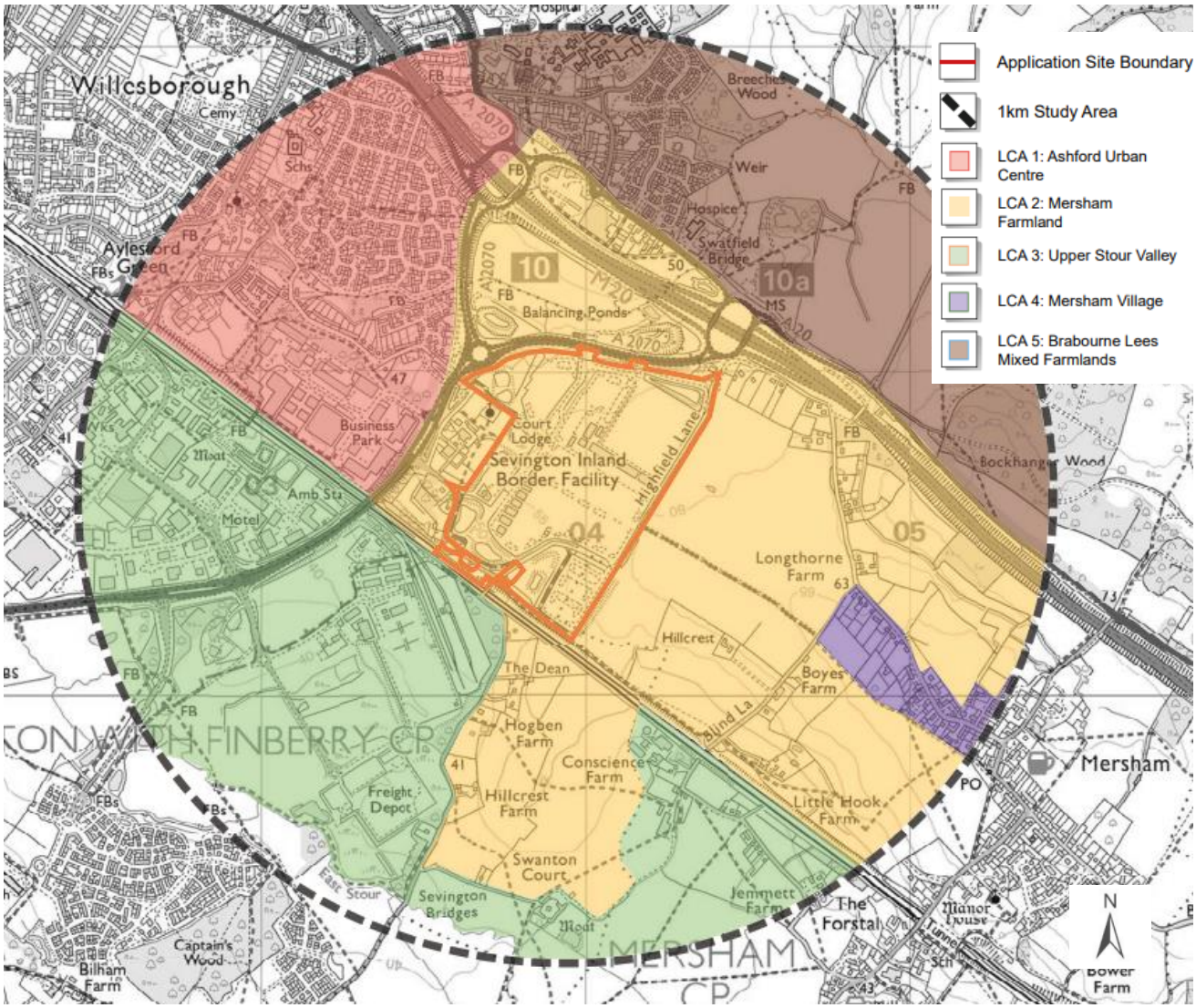
The biodiversity enhancements, management and monitoring commitments proposed by the additional mitigation measures within the LMMP would result in **beneficial effects** to bats, GCN, breeding birds, reptiles and water voles which will be **significant at site level**.

12. Landscape and Visual Impact Assessment

As a result of the topography and the urban setting adjacent to the Development, the surrounding receptors are experiencing views mostly to the immediate locations around the Application Site. Most medium to long distance views are restricted by intervening features. The localised significant effects are limited to residents in proximity to the Development, and the users of adjacent PRoWs.

The local landscape would be mostly unaffected with the exception of Landscape Character Area (LCA) 2, Mersham Farmlands, that is hosting the Development and has experienced a minor loss of arable fields and, LCA 5, Brabourne Lees Mixed Farmlands, which is sharing visual connectivity with the Development. The locations of LCA's for the Application Site and surrounding context are shown in **Figure 6**.

Figure 6 Landscape Character Areas



Additional mitigation measures are proposed within the Landscape Masterplan and the External Lighting Assessment, summarised as follows:

- Thicket planting mix along the Application Site boundary to include more evergreen species to provide an all-year-round screening.
- Additional planting to be introduced by the ponds at the south-west boundary to screen views from receptors on Church Road.
- Additional planting to be introduced along the north boundary to mitigate views for the north.
- Additional planting to be introduced along the PRoW adjacent to St. Mary's Church to screen views of the footpath users.
- Lighting strategy to be adjusted in terms of turning lighting off in certain vehicle parking areas and inspections sheds.
- Luminaire shields (baffles) to be introduced to certain luminaires in proximity to the residential areas.

It is expected that with mitigation measures in place, the Development will be visible to the residents of Church Road looking east and towards the Application Site for both day and night, by PRoW users looking south-east

towards the Application Site at night time, by residents of the farm off Blind Lane looking west and towards the Application Site, Residents on Hythe Road looking south towards the Application Site and Recreational users of North Downs Way at night time, who will experience **long-term, local, moderate (significant) adverse effects.**

The only local landscape character that is expected to experience **long-term moderate adverse (significant)** effects is LCA 5, due to its high sensitivity to change.

13. RESIDUAL EFFECTS AND EFFECT INTERACTIONS

Residual effects comprise those effects likely to occur as a result of the continued operation of the Development, taking into account all proposed mitigation measures.

The identified residual effects are then used to undertake an assessment of the potential for effect interactions. Effect interactions arise when two or more individual effects arising from the Development have the potential to affect a single receptor or group of receptors, resulting in the potential for a cumulative effect to arise.

Residual Effects

A summary of those residual effects identified as being minor adverse / beneficial or above within the preceding technical chapters is provided below. No further consideration is given to those residual effects identified as negligible, as negligible effects are not considered likely to affect identified receptors, either in isolation or in combination with other residual effects.

Continued Operational Development Residual Effects

No residual effects associated with the continued operation of the Development were identified in relation to air quality. **Table 3** shows a summary of the adverse residual effects for the continued operation of the Development.

Table 3: Continued Operation of the Development - Adverse Residual Effects

Topic	Nature of Effect	Receptor(s)	Residual Effect	Significance
Traffic and Transport	Increased HGV movements	Local highway network comprising the A2070 (Link 6)	Long-term moderate adverse effect.	**Significant**
	Increased traffic flows	Local highway network (Driver Delay) at M20 J10a	Long-term minor adverse effect	Not Significant
Noise and Vibration	Standby Generators	Sunnybank - residential property opposite staff car park entrance Church Road	Night-time: local, permanent, intermittent, direct, minor adverse effect	Not significant
	HGV movements, electric hook ups and Shed 5 operations.	Bridge Cottage – residential property off Church Road to the southwest of the Application Site.	local, permanent, intermittent, direct minor adverse effect	Not significant
	Road Traffic Noise	Lagonda Lodge residential property to the northeast of the Application Site where Highfield Lane becomes Kingsford Street.	Negligible to local, permanent, direct minor adverse effect.	Not significant
Cultural Heritage	Urbanising effect due to hard standing, buildings and lighting	Church of St Mary	**Local, permanent, long-term, indirect, moderate adverse effect.**	**Significant**
Landscape	Change to Landscape Character Area	Brabourne Lees Mixed Farmlands	**Long-term, local, moderate adverse effect**	**Significant**
Visual	View looking southeast towards the Application	Users of PRoW and Visitors of St. Mary's Church (Day)	Long-term, local, minor adverse effect	Not significant

Topic	Nature of Effect	Receptor(s)	Residual Effect	Significance
Traffic and Transport	Increased HGV movements	Local highway network comprising the A2070 (Link 6)	Long-term moderate adverse effect.	**Significant**
	Increased traffic flows	Local highway network (Driver Delay) at M20 J10a	Long-term minor adverse effect	Not Significant
	Site from PRoW users and Visitors of St. Mary's Church (Grade I Listed).	Users of PRoW and Visitors of St. Mary's Church (Night)	**Long-term, local, moderate adverse effect**	**Significant**
	View from the front of residential properties along Church Road. View looking east and towards the Application Site	Residents on Church Road (Day)	**Long-term, local, moderate adverse effect**	**Significant**
		Residents on Church Road (Night)	**Long-term, local, moderate adverse effect**	**Significant**
	View from PRoW and residents of Blind Lane, looking west and towards the Application Site	Residents of the farm of Blind Lane	**Long-term, local, moderate adverse effect**	**Significant**
	View looking south towards the Application Site from PRoW along the rear of properties and off Hythe Road.	Users of PRoW	Long-term, local, minor adverse effect	Not significant
		Residents on Hythe Road	**Long-term, local, moderate adverse effect**	**Significant**
	View from North Downs Way within Kent Downs National Landscape, looking southwest and towards the Application Site.	Recreational users of North Downs Way	**Long-term, local, moderate adverse effect**	**Significant**

Table 4 outlines the beneficial residual effects that were identified in **ES Volume 1: Chapters 6** to **Chapter 11** and **Volume 3** for the continued operation of the Development.

Table 4: Continued Operation of the Development - Beneficial Residual Effects

Topic	Nature of Effect	Receptor(s)	Residual Effect	Significance
Socio-Economics	Job Creation (Direct)	Ashford Borough	**Permanent, long-term, direct, moderate beneficial effect.**	**Significant**
	Employment	Ashford Borough	Permanent, long-term, direct, minor beneficial effect.	Not Significant
	Economic Output	Ashford Borough	Permanent, long-term, direct, minor beneficial effect.	Not Significant
	Workforce Expenditure	Ashford Borough	Permanent, long-term, direct, minor beneficial effect.	Not Significant
Ecology and Biodiversity	GCN population monitoring from update LEMP	Amphibians	**Beneficial at Site level**	**Significant**
	Monitoring and re-siting of failed bat boxes (update LEMP)	Bats (roosting bats)	**Beneficial at Site level**	**Significant**
	Monitoring and re-siting of failed bird boxes (update LEMP)	Breeding birds	**Beneficial at Site level**	**Significant**
	On-site habitat monitoring and management practices	Reptiles	**Beneficial at Site level**	**Significant**

Topic	Nature of Effect	Receptor(s)	Residual Effect	Significance
	(within the LEMP) suitable for Reptiles			
	Management and maintenance (within the LEMP) of SuDs and Ponds provide habitat connectivity for Water Vole local populations.	Water Vole	**Beneficial at Site level**	**Significant**

Effect Interactions

In assessing the effects of a particular development proposal, consideration is also given to the cumulative effects that may arise from the proposal. Two types of cumulative effects which would result from the Development being brought forward have been assessed:

- **Intra-development effects**: combined effects of individual effects resultant from the Development upon a set of defined sensitive receptors, for example noise, dust and visual effects.
- **Inter-development effects**: combined effects of the Development with other schemes, which individually might be insignificant, but when considered together could cause a significant cumulative effect; and

Other schemes which have been assessed for inter-development effects are shown in **Figure 3** and are detailed in **Table 2** of the NTS**.**

Intra-Development Effects

Likely significant residual Intra-Development cumulative effects (in other words, mitigation for the Development as set out in all technical chapters of the ES is assumed to be implemented) have been identified and qualitatively assessed using the findings of all technical assessments reported within the ES, together with professional judgement.

The likely residual beneficial or adverse intra-development effects (both significant and non-significant) identified for sensitive receptors for the continued operation of the Development are listed in **Table 5.**

Table 5 Likely Operational Intra-Development Effects

Sensitive Receptor / Land Use	Operation	Effect Interaction and Significance
Ashford Borough (direct job creation)	**Soc+**	No n/a
Ashford Borough (employment, economic output, and workforce expenditure)	Soc +	No n/a
Church of St Mary	**CH-, Vis-**	Yes **Significant**
Resident of Church Road (Sunnybank Cottage).	N-, **Vis-**	Yes **Significant**
Protected species and habitat creation	**E+**	No n/a
Road users of the A2070 (Link 6)	**T+**	No n/a
Road Users of the M20 (Junction 10a)	T	No n/a
Key:	T = Transport and Access CH = Cultural Heritage N = Noise V = Vibration	+ = Beneficial effects anticipated - = Adverse effects anticipated +/- = Beneficial or adverse effects anticipated

Sensitive Receptor / Land Use	Operation	Effect Interaction and Significance
	D = Dust Vis = Visual L = = Landscape	Any significant residual effects are identified in **bold**.

Table 5 indicates that there is the potential for intra-development effects to take place for the continued operation of the Development. Given the nature of the residual effects (comprising a combination of noise, and visual effects), effect interactions are likely to be limited to the Church of St Mary and resident of Church Road, Sunnybank Cottage.

Although other residual environmental effects occur, it is not anticipated that there would be an interaction with other different topics, as such these are considered to be 'not significant'.

Inter-Development Effects (Combined Effects)

There is nothing in law which establishes the parameters for an Inter-Development cumulative assessment. However, using professional experience and expert judgement, and in consultation with ABC, consideration has been given to the following:

- Criterion 1: Projects within 1km of the Application Site and with a valid planning permission (or have submitted a planning application and are anticipated to have planning consent by the time the planning application goes before the planning committee);
- Criterion 2: Projects meeting criterion 1 which have a non-residential floorspace uplift of greater than 10,000m^2 Gross External Area (GEA);
- Criterion 3: Projects meeting criterion 1 which have more than 150 residential units;
- Criterion 4: Projects meeting criterion 1 which have a total site area of greater than 5ha; and
- Criterion 5: Projects meeting criterion 1, but not necessarily criterion 2-4, which introduce sensitive receptors near to the Application Site.

Combined effects have been identified and assessed in relation to the worst-case effects for each technical topic in a cumulative scenario. This scenario takes the wider Cumulative Schemes into consideration and assesses the combined likely cumulative effects of the Development in combination with the various developments outlined in **Section 2: EIA Methodology**.

The following technical topics did not identify any significant cumulative effects and are therefore omitted from **Table 6**:

- Transport and Access;
- Air Quality;
- Noise and Vibration;
- Cultural Heritage;
- Ecology and Biodiversity.

Table 6 Summary of Likely Significant Inter-Development Operational Cumulative Effects

Topic	Combined Effect	Significance
Socio-Economics	Impact on total job creation (all sectors) in Ashford	**moderate beneficial (Significant)**
Socio-Economics	Net employment in Ashford	**moderate beneficial (Significant)**
Socio-Economics	Creation of Economic Output in Ashford	**moderate beneficial (Significant)**
Socio-Economics	Workforce Expenditure in Ashford	**moderate beneficial (Significant)**

14. NEXT STEPS

Following the submission of this detailed planning application, there is an opportunity for any interested parties to comment on the proposal. The ES and a set of documents supporting the planning application can be viewed on the Planning Inspectorate (PINS) website:

https://find-crown-development.planninginspectorate.gov.uk/applications

Additional copies of this Non-Technical Summary can be obtained free of charge. Electronic copies of the ES can be purchased from Waterman on request (contact details below).

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Glossary of Terms

Above Ordnance Datum (AOD)	Land levels in the UK are measured relative to the average sea level at Newlyn in Cornwall. This average level is referred to as 'Ordnance Datum'. Benchmarks, spot heights and contours on UK Ordnance Survey maps show heights above Ordnance Datum in metres.
Adverse	Having a negative/harmful effect on a receptor.
Amenity	An element of a location or neighbourhood that helps to make it attractive or enjoyable for residents and visitors.
Aquifer	A below ground, water-bearing layer of soil or rock.
Archaeological Priority Area	Areas of archaeological priority, significance, potential or other title, often designated by the local authority.
Baseline	Existing environmental conditions present on, or near a site, against which future changes may be measured or predicted.
Beneficial	i.e. 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).
Conservation Area	An area designated under Planning (Listed Buildings and Conservation Areas) Act 1990 as being of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance.
Contaminated Land	"*any land which appears to the local authority in whose area it is situated to be in such a condition, by reason of substances in, on or under the land, that -* *a. significant harm is being caused or there is a significant possibility of such harm being caused; or b. pollution of controlled waters is being, or is likely to be caused;…"* as defined by section 78A(2) Part IIA of the Environmental Protection Act 1990.
Contamination	Contamination is the addition, or the result of addition, or presence of a material or materials to, or in, another substance to such a degree as to render it unfit for its intended purpose.
Cumulative Effects	The total effects on a receptor when effects from all sources are considered, including in-combination effects and from other surrounding schemes.
Operation	Assesses the of the Proposed Development during the operational phase (i.e. completed development) on the sensitive receptors surrounding the site;
Dust	Fine particles of solid materials ranging in size from 1 to 75µm (micrometres or microns - millionths of a metre) diameter (see British Standard 3405) capable of being re-suspended in air and settling only slowly under the influence of gravity where it may cause nuisance.
Environmental Impact Assessment (EIA)	A technique for ensuring that the likely effects of new development on the environment are fully understood and taken into account before the development is allowed to go ahead. It provides a focus for public scrutiny of the project and enables the importance of the predicted effects, and the scope for modifying or mitigating them, to be properly evaluated by the decision-making authority.

EIA Development	Development that falls under the Schedule 1 or 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended 2015) as requiring an EIA.
Emission	A material that is expelled or released to the environment. Usually applied to gaseous or odorous discharges to the atmosphere.
Environmental Statement	Document that reports the findings of an Environmental Impact Assessment.
Fear and Intimidation	The impact of this is dependent on the volume of traffic, its HGV composition, its proximity to people or the lack of protection caused by such factors as narrow pavement widths
Grade II listed building	Buildings of special architectural or historic interest.
Greenhouse Gas	A greenhouse gas is a gas which is present in the Earth's atmosphere and released through anthropogenic activities, within the atmosphere they absorb and emit infrared radiation, contributing to global warming.
Groundwater	Water associated with soil or rocks below the ground surface but is usually taken to mean water in the saturated zone.
Heritage asset	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.
Historic environment	All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.
Listed Building	A building included in a statutory list produced by the Secretary of State for Culture, Media and Sport. It comprises buildings and other structures that are of special architectural or historic interest and are protected under the terms of the Planning (Listed Buildings and Conservation Areas) Act 1990.
Made Ground	Artificial deposit. An archaeologist would differentiate between modern made ground, containing identifiably modern inclusion such as concrete (but not brick or tile), and undated made ground, which may potentially contain deposits of archaeological interest.
Medieval	AD 410–1540
Mitigation (measure)	The measures put forward to prevent, reduce and where possible, offset any adverse effects on the environment.
Noise	An unwanted sound that is loud, unpleasant or that causes disturbance.
Non-Technical Summary (NTS)	A summary of the Environmental Statement in non-technical language providing a concise, yet comprehensive summary of the likely effects of the project on the environment.
Pedestrian and Cycle Delay	Delay caused to pedestrians and cyclists as a result of the Proposed Development.
Permanent	Long-lasting or non-fading.

PM_{10}	Particulate matter with an aerodynamic diameter of less than 10 micrometres.
$PM_{2.5}$	Particulate matter with an aerodynamic diameter of less than 2.5 micrometres.
Sensitive Receptor	Sensitive Receptors comprise anything that may be affected by an environmental effect, be this human beings, socio-economic activity, habitats, species, controlled waters, landscape or cultural heritage.
Residual (archaeology)	When used to describe archaeological artefacts, this means not in situ, i.e., found outside the context in which it was originally deposited.
Residual effects	Environmental effects remaining after mitigation measures have been implemented.
Risk assessment	An assessment of the likelihood and severity of an occurrence.
Schedule 2 (development)	Development project types under the EIA Regulations where EIA is not mandatory in all cases but may be required, depending on the size, nature and scale of the development and the potential for significant environmental effects to arise.
Scoping	An initial stage in determining the nature and potential scale of environmental effects arising as a result of a development, and an assessment of what further studies are required to establish their significance.
Special Development Order	Planning permissions granted by means of a Special Development Order. Only applies to England. A Special Development Order usually details the development permitted and the land to which the permission applies, together with any conditions and limitations that apply to the planning permission.
Sensitivity	The capacity of an organ or organism to respond to stimulation.
Setting	The context in which a building or area can be appreciated.
Severance	The perceived division that can occur within a community when it becomes separated by a major traffic artery. The term is used to describe a complex series of factors that separate people from places and other people. Severance may result from the difficulty of crossing a heavily trafficked road or a physical barrier created by the road itself. It can also relate to quite minor traffic flows if they impede pedestrian access to essential facilities
Significance (for heritage policy)	The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.
Significant	Important; of consequence
Sound	Vibrations that travel through the air or another medium and can be heard when they reach a person's ear.
Source	Location from which contamination is, or was, derived.
Standards	A nationally defined set of concentrations for nine pollutants below which health effects do not occur or are minimal
Temporary	Lasting existing, serving, or effective for a time only; not permanent.
Threshold	The minimum value that will produce a response or specified effect.

Abbreviations

ABC	Ashford Borough Council
AQMA	Air Quality Management Area
APA	Archaeological Priority Area
CEMP	Construction Environment Management Plan
CIEEM	Chartered Institute of Ecology and Environmental Management
COMAH	Control of Major Accident Hazard
Defra	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
EA	Environment Agency
EIA	Environmental Impact Assessment
ES	Environmental Statement
EU	European Union
FTE	Full Time Equivalent
FRA	Flood Risk Assessment
FWRA	Foundation Works Risk Assessment
GEA	Gross External Area
GHG	Greenhouse gas
GIA	Gross Internal Area
GLA	Greater London Authority
GLAAS	Greater London Archaeological Advisory Service
ha	Hectare
HGV	Heavy Goods Vehicle
HIA	Health Impact Assessment
HMRC	His Majesty's Revenues & Customs
IAQM	Institute of Air Quality Management
IBF	Inland Boarder Facility
IEF	Important Ecological Features
IEMA	Institute of Environmental Management and Assessment
KCC	Kent County Council
LBL	London Borough of Lewisham

LEMP	Landscape Environmental Management Plan
LLFA	Local Lead Flood Authority
LNR	Local Nature Reserve
LPA	Local Planning Authority
LSIS	Locally Significant Industrial Site
LWS	Local Wildlife Sites
OPP	Outline Planning Permission
PRoW	Public Right of Way
RBG	Royal Borough of Greenwich
SBI	Site of Borough Importance
SINC	Site of Importance for Nature Conservation
SMI	Site of Metropolitan Importance
SSSI	Site of Special Scientific Interest
SWMP	Site Waste Management Plan
TfL	Transport for London
TVIA	Townscape and Visual Impact Assessment
NTS	Non-Technical Summary
SDO	Special Development Order
SPZ	Source Protection Zone
SuDS	Sustainable Drainage Systems
UK	United Kingdom
UKPN	UK Power Networks
UXO	Unexploded Ordnance

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