

**Appendix 16 - Air Quality Technical Note**

**Applicant Statement of Case - Appendices  
CROWN/2025/000002 Sevington Inland Border Facility**

# Sevington Inland Border Facility, Mersham, Ashford, TN25 6GE

## Application Reference No: CROWN/2025/0000002

### Technical Note – Air Quality Statement of Matters

**Date:** 24 November 2025  
Department for Transport (DfT), His Majesty's Revenues & Customs (HMRC) & Department for Environment, Food & Rural Affairs (Defra)

**Client Name:**

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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)

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## 1. Introduction

- 1.1. This Technical Note provides additional information with respect to comments raised about air quality in Item 79 of the Statement of Matters (SoM). Consideration is also given to comments raised by Ashford Borough Council (ABC) post submission.

### Assessor Experience

This note was prepared by Sarah Slater (C.Env, MIAQM), Associate Director of Air Quality at Waterman. Sarah has been responsible for the technical delivery of a wide range of air quality projects for a variety of clients in both the public and private sector. These projects include consideration of emissions from both transportation and industrial sources. Sarah has undertaken both monitoring and modelling assessments requiring an in depth understanding of the regulatory requirements for a variety of projects and the published technical guidance for their assessment.

## 2. Statement of Matters

### Inspectors Comment

- 2.1. *“What impacts and/or effects will there be in air quality terms from HGVs using, accessing, being stationary and exiting the site?*

*What surveys and/or monitoring have been undertaken in terms of particulate pollutants?*

*Does this assessment consider the site operating at full capacity?"*

*Applicant Response:*

- 2.2. The impacts were assessed in accordance with the EPUK/IAQM Planning guidance. A worst-case operational scenario was assessed, and the impacts were deemed negligible for NO<sub>2</sub> as well as PM (PM<sub>10</sub>, PM<sub>2.5</sub>) (Table 8.12, Table 8.13 in the Environmental Statement Chapter 8: Air Quality). The assessment included additional traffic on the road network from the proposals, cumulative developments within the area, as well as the transport refrigeration area emissions.
- 2.3. There have not been any Site-specific monitoring surveys undertaken. In line with industry best practice the data presented in the ES was taken from the Defra Background Maps which are modelled concentrations based on a 2018 base year. Baseline conditions included in the assessment considered local authority monitoring in the area both historical concentrations and the most recent available data at the time of assessment (2019-2023). There were no exceeding concentrations recorded and an overall declining trend in annual mean NO<sub>2</sub> concentrations in the area was noted. With respect to particulate, there were no particulate monitors in operation at the time of the assessment; therefore, in accordance with LAQM.TG(22), the Defra Background Maps were used in lieu. This approach is considered robust and was agreed with ABC during the scoping consultation process, details are provided in Volume 2, Appendix 8.2 of the ES.
- 2.4. The assessment considered the worst-case operating scenario (ie. the first opening year of the development operating at full capacity). The assessment considered the following:
  - Goods vehicle parking for up to 984 vehicles, including 42 entry lanes with a capacity of up to 240 goods vehicles;
  - 24 refrigerated semi-trailers (including 19 permanent and 5 reserved); and
  - 357 staff car parking spaces.

In addition, cumulative impacts of committed developments within the study area were included in the assessment. This is considered to be a robust approach.

### **3. Ashford Borough Council Comments**

*Consultee Comment*

- 3.1. *"The Council requests that a Site Management Plan is secured by appropriate planning condition. The Council considers that the Site Management Plan should include but not be limited to measures to mitigate impacts on air quality, including a requirement that vehicles do not idle for excessive periods of time and that an appropriate number of electric hook-up points are provided for refrigerated vehicles when parked in the different areas of the site. The Council request that site management actively direct vehicles to those hook up points. That approach will assist with both air quality as well as reduce noise impacts – refer to paragraphs 138-152 of the Report.*

*The Council also requests that a minimum 20% supply of Electric Vehicle Chargers should be provided in staff parking areas (utilising active 7.5KW chargers) and HGV parking areas (ultrafast chargers and/or other best infrastructure for HGVs) in order to facilitate a transition to use of that technology with attendant environmental benefits including air quality.*

*The Council considers that on-going Air Quality reporting should be secured by condition requiring liaison with the Council's Environmental Protection Team to ensure that monitoring equipment utilises best practices and technology in order to ensure accurate air quality results."*

*Applicant Response:*

- 3.2. The Applicant is in discussion with ABC to determine appropriate planning conditions. An Air Quality Management Plan and an updated Travel Plan could all be addressed in the planning conditions. The Applicant is also in discussion with ABC on an appropriately worded condition requiring submission, and implementation and monitoring of an updated Travel Plan. There are currently EVC hook ups for 24 refrigerated semi-trailers. This includes 19 permanent and 5 for use by additional vehicles. It is considered additional EVC could be addressed through the Travel Plan condition.