

1. Introduction

- 1.1. This Environmental Statement (ES) has been prepared by Waterman Infrastructure & Environment Limited (hereafter referred to as 'Waterman'), supported by a team of technical specialists. It accompanies a detailed planning application submitted to the Planning Inspectorate by Department for Transport (DfT), His Majesty's Revenues & Customs (HMRC) and Department for Environment, Food and Rural Affairs (Defra) (hereafter referred to as 'the Applicant') for the retention of the existing Inland Border Facility and Border Control Post (collectively referred to as the 'IBF') at Sevington near Ashford in Kent, TN25 6GE (hereafter referred to as 'the Application Site').

Site Context

- 1.2. The Application Site covers an area of approximately 48 hectares (ha) and is centred on National Grid Reference TR 03976 40758. 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, Highfield Lane and Church Road to the south and Church Road and A2070 (Bad Munstereifel Road) to the west.
- 1.3. The Application Site is currently in use for the operational IBF under temporary consent. 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, notably internal estate roads and areas for vehicle parking for staff and HGVs (at ground level). Buildings within the Application Site are limited to the northern central (Inland Border Facility) and south-western (Border Control Post) parts of the Application Site.
- 1.4. The Application Site is located within a semi-rural area on the outskirts of Ashford. Land uses in the wider area are varied in character, being primarily open and agricultural land, with scattered farms and dwellings to the north-east through to the south, and a mixture of industrial, commercial and residential development to the south-west and west. North-west and north of the Application Site, uses are primarily residential.
- 1.5. Further information on the Application Site is contained in **Chapter 3: Land Uses & Sensitive Receptors**.

Planning History

Stour Park West

- 1.6. In 2014, an outline planning application (ref. 14/00906/AS) (the '2014 Application'), which was accompanied by an Environmental Statement (ES), was submitted for the redevelopment of the Application Site, a scheme referred to as 'Stour Park':
- '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'.*
- 1.7. Outline Planning Permission (OPP) was granted in 2017. 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:

'Approval of the appearance, landscaping, layout and scale of the 'Phase 1A works' being the works comprising the estate roads, the sustainable drainage system embedded within open space and the landscaping and layout of that open space (including measures specifically designed for ecological/biodiversity enhancement purposes within that open space).'

- 1.8. A Certificate of Lawfulness of Existing Use or Development (Ref: 19/01099/AS) was granted in August 2019, confirming that development has commenced in relation to outline planning permission 14/00906/AS and associated Phase 1A works approved under reserved matters application reference 19/00579/AS.

Sevington Inland Border Facility - Special Development Order (SDO)

- 1.9. The application for the Special Development Order (SDO) for the site was submitted on 20 November 2020, pursuant to Article 4(1)(a) of the overarching SDO (statutory instrument) and granted under temporary consent on 01 December 2020
- 1.10. The planning description for the 'Sevington – Ashford Inland Border Facility' is as follows:
- "The temporary use of land for up to 5 years operating 24 hours a day 7 days a week, for an Inland Border Facility for use in different phases by Department for Transport, HM Revenue & Customs/Border Force, Department for Environment, Food and Rural Affairs, Department for Business, Energy and Industrial Strategy for border readiness, CTC, ATA and CITES checks, and market surveillance activities. The proposed development includes the laying out of up to 1,300 Heavy Goods Vehicle (HGV) parking spaces, capacity for 287 HGVs in 42 entry lanes, 357 staff car parking spaces, two temporary access points, formation of a new permanent access (main access to the M20 junction 10a link road) and an emergency access point to the north, diversions and extinguishments to PRowS, the erection of buildings and structures for border processing purposes within the development plot area of up to 25,890m² to a maximum height of 12m, security fencing to a maximum height of 2.1m, CCTV, noise attenuation bunds and fences to a combined maximum height of 5m, lighting columns to a maximum height of 12m, drainage and all associated engineering, site preparation works and extensive hard and soft landscape works. Approval is also sought for the temporary use of part of the site for a period of up to 12 months for storage of approximately 83,140m³ of stockpile material."*
- 1.11. The 'SDO site' comprised to two parcels of land:
- the western parcel, which comprised 48ha of agricultural land, to accommodate all operational facilities limited to land west of Highfield Lane; and
 - the eastern parcel, comprising approximately 45ha to the east of Highfield Lane which was included for use during the temporary stockpiling of material necessary for the earthworks and associated bunding and landscaping.
- 1.12. The requirement for the SDO was due to the national importance of the timely delivery of border infrastructure after the United Kingdom (UK) exited the European Union (EU). A transition period was required to adjust and negotiate future trading relationships. Introduced to support customs checks at ports, the requirement for inland border infrastructure would provide facilities to check goods moving under a Common Transit Convention and provide customs checks on non-transit imports and exports.
- 1.13. The SDO was accompanied by a series of environmental studies, including 'An Analysis of the Likely Environmental Effects of the Development Report' (November 2020) 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.

- 1.14. The scheme required Heavy Goods Vehicle (HGV) parking and border checking facilities for His Majesty's Government (HMG), under temporary consent, commencing on the 01 January 2021 up until 31 December 2025.
- 1.15. Following consent of the SDO application on 01 December 2020 ('the 2020 Scheme'), three subsequent applications were approved on 23 December 2020, 24 November 2021, and 28 April 2022.

Scheme Overview

- 1.16. The IBF is currently in operation on a temporary basis, and it falls within the administrative boundary of Ashford Borough Council (ABC) (hereafter referred to as ABC).
- 1.17. The description of development as it appears on the planning application forms is as follows:

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

- 1.18. The scheme (hereafter referred to as the 'Development') comprises buildings and structures for border processing purposes comprising 17,277sqm Gross External Area (GEA), 984 goods vehicle parking spaces, capacity for 240 goods vehicles in 42 entry lanes, 24 refrigerated semi-trailer spaces (including 19 permanent and 5 reserved) with 24 electric charging points for refrigerated vehicles in total, and 357 staff car parking spaces.
- 1.19. Further information on the Development is contained in **Chapter 4: The Development**.

Environmental Impact Assessment (EIA)

The Purpose of EIA

- 1.20. EIA is a formal process of identifying, predicting, evaluating and mitigating the likely significant environmental effects arising from a project. It is an iterative process, allowing for the evolution of the most practicable environmentally sustainable design. EIA ensures that, where necessary and feasible, measures are considered and implemented at the design stage to prevent, reduce and / or offset potentially adverse significant environmental effects. It also aims to ensure that any beneficial effects of a development are maximised.
- 1.21. The purpose of EIA, as defined by the UK Government, is to:
"[...] protect the environment by ensuring that a local planning authority, when deciding whether to grant planning permission for a project which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision-making process..."¹.
- 1.22. The findings of the EIA process are reported in the ES.

The Applicable EIA Regulations

- 1.23. This ES is submitted in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017² (as amended^{3,4,5}) (hereafter referred to as 'the EIA Regulations').
- 1.24. A detailed planning application will be submitted to the Planning Inspectorate (PINS) for Crown Development in accordance with section 70 of the EIA Regulations.

- 1.25. The Development is not listed under Schedule 1 of the EIA Regulations (for which EIA is mandatory) but is listed under Schedule 2, Category 10b urban development projects, where EIA is required where a development “...is likely to have significant effects on the environment by virtue of factors such as its nature, size or location...”

The EIA Process

- 1.26. Regulation 4(2) to (4) of the EIA Regulations provides salient information in relation to the EIA process. The key considerations for EIA are described as follows:

“... (2) The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors -

- (a) population and human health;*
- (b) biodiversity, with particular attention to species and habitats protected under any law that implemented Directive 92/43/EEC(1) and Directive 2009/147/EC(2);⁶*
- (c) land, soil, water, air and climate;*
- (d) material assets, cultural heritage and the landscape;*
- (e) the interaction between the factors referred to in sub-paragraphs (a) to (d).*
- (3) The effects referred to in paragraph (2) on the factors set out in that paragraph must include the operational effects of the proposed development, where the proposed development will have operational effects.*
- (4) The significant effects to be identified, described and assessed under paragraph (2) include the expected significant effects arising from the vulnerability of the proposed development to major accidents or disasters that are relevant to that development....”.*

The Environmental Statement (ES)

- 1.27. Regulation 18(3) of the EIA Regulations provides a definition of an ES. **Table 1.1** summarises the minimum information requirements specified in this Regulation and sets out where these requirements are satisfied within this ES.

Table 1.1: Regulation 18(3) Requirements

Specified Information	Where addressed
<i>a) a description of the proposed development comprising information on the site, design, size and other relevant features of the development;</i>	Volume 1, Chapter 4: The Development
<i>b) a description of the likely significant effects of the proposed development on the environment;</i>	Volume 1, Chapters 6-11 and Volume 3: Landscape and Visual Impact Assessment
<i>c) a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible offset likely significant adverse effects on the environment;</i>	Volume 1, Chapters 6-11 and Volume 3: Landscape and Visual Impact Assessment
<i>d) a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment;</i>	Volume 1, Chapter 5: Alternatives

Specified Information	Where addressed
e) <i>a non-technical summary of the information referred to in sub-paragraphs (a) to (d)</i>	Non-Technical Summary
f) <i>any additional information specified in Schedule 4 relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected.</i>	Volume 1, Chapters 6-11

- 1.28. More detailed information requirements for inclusion within an ES are set out in Schedule 4 of the EIA Regulations. A complete table showing where the additional information in Schedule 4 has been addressed in the ES is provided in **Volume 2, Appendix 1.1**.
- 1.29. The content of the ES is set out in **Table 1.2** below.

Table 1.2: Content of the ES

ES Volume	ES Component(s)
N/A	Non-Technical Summary
Volume 1	Main Text
Volume 1	Chapter 1: Introduction
Volume 1	Chapter 2: EIA Methodology
Volume 1	Chapter 3: Land Uses & Sensitive Receptors
Volume 1	Chapter 4: The Development
Volume 1	Chapter 5: Alternatives
Volume 1	Chapter 6: Socio Economics
Volume 1	Chapter 7: Transport and Access
Volume 1	Chapter 8: Air Quality
Volume 1	Chapter 9: Noise and Vibration
Volume 1	Chapter 10: Cultural Heritage
Volume 1	Chapter 11: Ecology and Biodiversity
Volume 1	Chapter 12: Residual Effects & Effect Interactions
Volume 1	Chapter 13: Next Steps
Volume 2	Appendices
Volume 3	Landscape & Visual Impact Assessment

- 1.30. Information on how the scope of this ES was agreed with ABC is contained in **Chapter 2: EIA Methodology**, along with details of the consultation with other statutory and non-statutory stakeholders, including Natural England, the Environment Agency and Historic England.

The Project Team

- 1.31. This ES has been prepared by Waterman, supported by a team of technical specialists, on the basis of information provided by the Applicant, and the planning consultant.
- 1.32. The key members of the Applicant's professional team are listed in **Table 1.3**. The technical specialists and ES authors are listed in **Table 1.4**.




Table 1.3: The Applicant's Consultant Team

Role	Company
Applicant	Department for Transport (DfT), His Majesty's Revenues & Customs (HMRC) and Department for Environment, Food and Rural Affairs (DEFRA)
Planning Consultant	Jones Lang LaSalle (JLL)
EIA Project Manager, Flood Risk Consultant, Land Quality Consultant, and Arboriculture Consultant	Waterman
Sustainability Consultant, and Lighting and Utilities Consultant	Waterman Building Services
Landscape Architect	BCA Architects
Architect	Chetwoods Architects
Building Surveyors	Plowman Craven
Public Consultation	Kanda

Competent Experts

- 1.33. Regulation 18(5) of the EIA Regulations states that:
- “... In order to ensure the completeness and quality of the environmental statement –*
- a) The developer must ensure that the environmental statement is prepared by competent experts; and*
 - b) The environmental statement must be accompanied by a statement from the developer outlining the relevant expertise and qualifications of such experts....”.*
- 1.34. 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 scheme is voluntary and allows organisations that lead the co-ordination of statutory EIAs in the UK to make a commitment to excellence in their EIA activities and have this commitment independently reviewed. Further information on the scheme can be found here: [\[Redacted\]](#)
- 1.35. **Table 1.4** sets out the specialists that have prepared the various technical assessments and other relevant inputs across all volumes of this ES. Profiles for specific individuals within these organisations are provided in **Volume 2, Appendix 1.2**.

Table 1.4: The ES Authors

Author	ES Components
	Chapter 1: Introduction
	Chapter 2: EIA Methodology
	Chapter 3: Land Uses & Sensitive Receptors
	Chapter 4: The Development
	Chapter 5: Alternatives
	Chapter 7: Transport and Access
	Chapter 8: Air Quality
	Chapter 9: Noise and Vibration
	Chapter 11: Ecology and Biodiversity
	Chapter 12: Residual Effects & Effect Interactions
	Chapter 13: Next Steps
	Chapter 6: Socio Economics
	Chapter 10: Built Heritage

ES Availability & Comments

- 1.36. The ES is available for viewing by the public on the Planning Inspectorate website:
<https://find-crown-development.planninginspectorate.gov.uk/applications>
- 1.37. Hard copies and electronic copies of the ES can be obtained by contacting:
Waterman Infrastructure & Environment Limited
 Pickford's Wharf
 Clink Street
 London
 SE1 9DG
 Tel: 020 7928 7888
 Email: ie@watermangroup.com
- 1.38. Charges for paper copies will be made in accordance with Regulation 24 of the EIA Regulations (i.e. to reflect printing and / or distribution costs). Electronic copies of all documents can be downloaded from the Planning Inspectorate website.
- 1.39. Further information on the determination of the planning application is contained in **Chapter 13: Next Steps**.

Other Planning Documentation

- 1.40. This ES is one of a suite of documents submitted alongside the planning application for the Development. Other planning documentation is as follows:
- Application Forms,
 - Ownership Certificates and Notices (prepared by **JLL**);
 - Detailed planning application drawings and schedule (prepared by **Chetwoods**);
 - Planning Statement (prepared by **JLL**);

- Design & Access Statement (prepared by **Chetwoods**);
- Statement of Community Involvement (prepared by **Kanda**);
- Transport Assessment (prepared by **Waterman**);
- Biodiversity Net Gain Assessment (prepared by **Waterman**);
- Operational Waste Management Strategy (prepared by **Waterman Building Services**);
- Arboriculture Impact Assessment (prepared by **Waterman**);
- Preliminary Environmental Risk Assessment (prepared by **Waterman**);
- Flood Risk Assessment (prepared by **Waterman**);
- External Lighting Assessment (prepared by **Waterman Building Services**);
- Utilities Statement (prepared by **Waterman Building Services**);
- Sustainability Statement (prepared by **Waterman Building Services**); and
- Energy Statement (prepared by **Waterman Building Services**).

References

- ¹ MHCLG, 2019. <https://www.gov.uk/guidance/environmental-impact-assessment>.
- ² HMSO, 2017. Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- ³ HMSO, 2018. The Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2018 (SI 2018/695).
- ⁴ HMSO, 2018. The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232).
- ⁵ HMSO, 2020. The Town and Country Planning (Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England) (Coronavirus) (Amendment) Regulations 2020 (SI 2020/515).
- ⁶ MHCLG, 2018 The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018