



Indicative Planning Application Boundary

2km Study Area

Cumulative Schemes





Project Details

WIE20982-100: Sevington Inland Border Facility, Ashford

Figure Title

Figure 6: Location of Cumulative Schemes

Figure Ref

File Location

Date

20982100-WAT-XX-XX-GS-N-760006

2024

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Figure 7 Types of Obtrusive Light

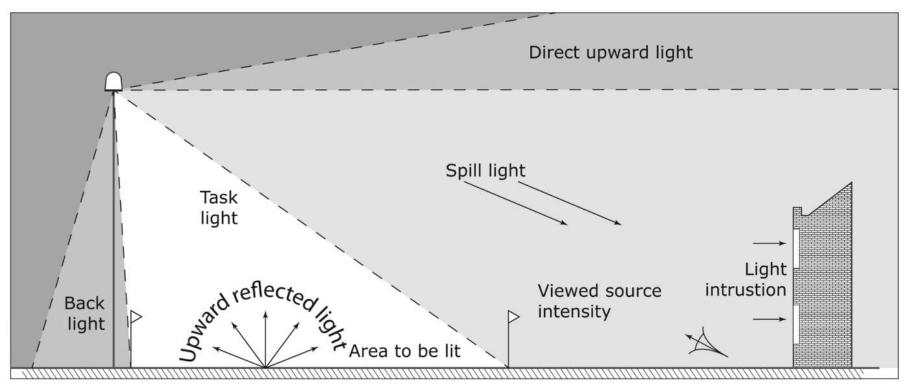


Figure 1: Types of obtrusive light

Source: Extract from The Reduction of Obtrusive Light, Guidance Note 01/21 (Institution of Lighting Professionals)



APPENDICES

APPENDIX A: EIA STRATEGY

Sevington Inland Border Facility- EIA Strategy Note

Date: 04/09/2024

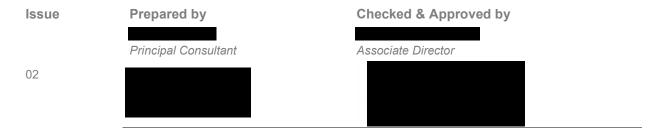
Client Name: Department for Transport (DfT), His Majesty's Revenues &

Customs (HMRC) and Department for Environment, Food

and Rural Affairs (Defra)

Document Reference: WIE20982

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)



Introduction

Department for Transport (DfT), His Majesty's Revenues & Customs (HMRC) and Department for Environment, Food and Rural Affairs (Defra) ('The Applicant') is seeking to submit a full planning application for Sevington Inland Border Facility and Border Control Post (hereafter referred to as the IBF) in January 2025. This site is located to the southeast of Ashford, at Junction 10a of the M20, approximately 50 miles south-east of London. The site is located within Kent County Council (KCC) and Ashford Borough Council (ABC) administrative boundaries.

Waterman Infrastructure and Environment (WIE) have been appointed to undertake the Environmental Impact Assessment (EIA) and prepare an Environmental Statement (ES) to support the Planning Application.

The Sevington IBF is currently operational, having been granted temporary permission under a Special Development Order (SDO) in 2020. The Applicant is seeking to secure full planning consent for the IBF by submitting a full planning application to the local authority (ABC).

Proposed Development

The Proposed Development comprises the current operational IBF including:

- Goods vehicle parking for up to 855 vehicles, including 42 entry lanes with a capacity of up to 260 goods vehicles, 24 refrigerated semi-trailers and 357 staff car parking spaces;
- · Border checking facilities;



- · Security fencing;
- · Noise attenuation bunds and fences;
- CCTV and lighting columns;
- Drainage; and
- All associated engineering and landscaping works.

The estate roads, sustainable drainage system and landscaping already benefit from planning permission, pursuant to extant planning permission (reference 19/00579/AS).

Application Site



Aerial view of the Sevington IBF site and red-line boundary (DfT, HMRC and Defra)

For the 2020 SDO application, the planning application boundary comprised:

- the Sevington IBF (western parcel) comprises approximately 48 hectares (ha); and
- the eastern parcel which covers an area of approximately 45 ha.

The Planning Application will only consider the western parcel where the Sevington IBF is currently located, this is referred to as the 'Application Site'.

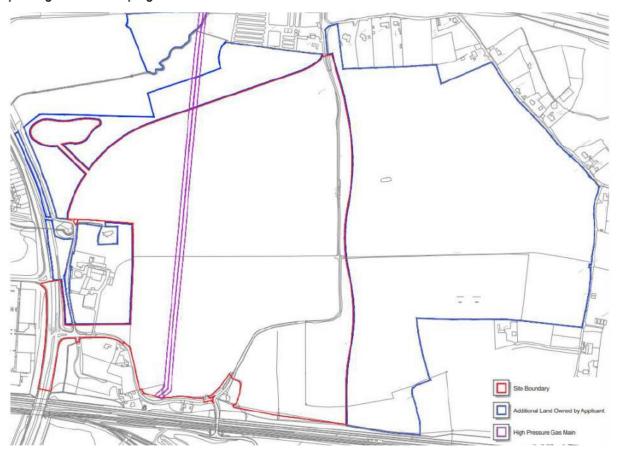


Planning History

Extant Application

Much of the land, covered by the Application Site, was subject to an outline planning application (reference 14/00906/AS), which was accompanied by an ES. Outline planning consent was granted in September 2017:

'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 comprising: up to 140,000 sq m Class B8 (storage and distribution) use; up to 23,500 sq m of B1a/B1c Business (of which a maximum of 20,000 sq m of B1a); up to 15,000 sq m of B2 (general industry); up to 250 sq m of A1 (retail shops) and 5,500 sq m of sui generis to accommodate Kent Wool Growers together with ancillary and associated development including utilities and transport infrastructure, car parking and landscaping.'



To discharge Condition 1A of the outline permission, a Reserved Matters Application for Phase 1A (reference 19/00579/AS) was submitted and works implemented in 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)'

A copy of the approved masterplan of the Phase 1A works is provided as Annex A.

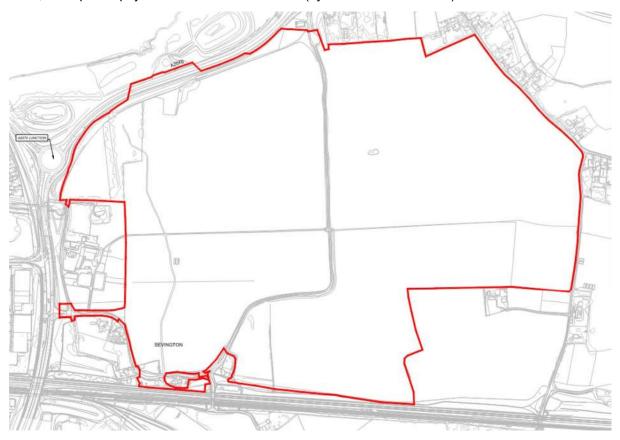


A Certificate of Lawfulness of Existing Use or Development (reference 19/01099/AS) was granted on 15th August 2019, confirming that development has commenced in relation to the outline planning permission 14/00906/AS and associated Phase 1A works, approved under reserved matters application reference 19/00579/AS.

Special Development Order (SDO)

Following the exit of the UK from the EU (31st December 2020), new trade and travel rules (effective as of 1st January 2021) resulted in a requirement for increased inland border infrastructure, which included providing facilities to enable checks on the movement of goods and customs checks on imports and exports. Given the national importance of the timely delivery of border infrastructure, a Special Development Order (SDO) was made under the provisions of Schedule 59 of the Town and Country Planning Act 1990.

Temporary permission was granted by the Ministry of Housing, Communities and Local Government (and then the Department for Levelling Up, Housing and Communities) on 1st December 2020 (and then again on 23rd December 2020, 24th November 2021 and 28th April 2022, to account for evolving operational requirements) pursuant to a SDO, under Article 4(1)(a) of The Town and Country Planning (Border Facilities and Infrastructure) (EU Exit) (England) Special Development Order 2020, covering a land area of 67.5 ha and including the currently-operative IBF. The SDO expires on 31st December 2025, and upon expiry the land is to be reinstated (by 31st December 2026).



A series of environmental studies and reports were prepared to accompany the SDO application (and subsequent applications). It was determined that the temporary development proposals would not result in any significant environmental impacts and would not constitute EIA development.



The Planning Application

The existing IBF currently benefits from a temporary planning permission under an SDO, which will expire on 31st December 2025. The proposed planning application will seek full planning permission for the continued operation of the existing IBF.

Planning Strategy

Pre-application advice has been sought from the ABC, to confirm both the Planning and resulting EIA Strategies.

The proposed planning strategy is to voluntarily submit an ES alongside the new planning application. The planning application seeks to secure permanent permission for the Sevington IBF, which must be in place before 31st December 2025, being the date on which the current temporary SDO expires. As such, the intention is to submit a planning application in January 2025.

EIA Strategy

Due to the complexity of the planning application, whereby the Proposed Development is already in place via the temporary planning permission (due to expire in December 2025). For the purpose of the EIA, the ES will consider:

- a 'pre-development' baseline which will comprise the Application Site prior to the construction of the IBF, with only the Phase 1A works (reference 19/00579/AS) in place. The surveys and studies that were prepared in relation to the SDO application (2020) will be referred to; and
- The Proposed Development has already been constructed on the site. Therefore, it is the
 intention to 'scope out' the construction phase from the EIA, as the effects of these stages have
 already occurred and were considered in the environmental studies submitted with the SDO.

EIA Baseline

The current baseline conditions within the Application Site comprise the operational IBF. If the current baseline (2024) was used as the basis for the EIA for the permanent operation of the IBF, it would not indicate any demonstrable difference from the current (temporary) operation. Therefore, to ensure a robust assessment, a pre-development baseline (prior to the construction of the IBF) is appropriate.

For the purpose of the EIA, the baseline for the Application Site comprises a largely cleared site, with Phase 1A works (reference 19/00579/AS) of the extant permission already in place – this comprises 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).

The environmental conditions for the Application Site and surrounding area, are presented within the SDO reports (2020). These reports will be referred to and will form the basis for the baseline information for the EIA.

Environmental topics to be considered with the ES have been listed below, and the sources of baseline information to be included in the ES are presented for agreement.



Topic	Baseline to be utilised for the application (refer to documents to be referenced)	Next Steps (consultation required)
Transport and Access	A Transport Assessment was prepared by Mott MacDonald in 2020; in principle, it would be possible to utilise the baseline data contained within these reports. It would be reasonable to adopt the previously accepted Do-minimum (DM) baseline and factor to a selected base year (if required) It should be noted that the highway network has evolved	Consultation with Ashford Borough Council, Kent County Council, and National Highways officers, to determine the scope and methodology for assessment.
	during the lifecycle of the existing IBF, with M20 J10a opening (circa Q4 2019), site access and operations (circa Q1 2021), and Orbital Park signal controlled crossroads (circa Q1 2023).	
	Accident data is no longer representative and new data would be obtained for most recent five-year period.	
Air Quality	The baseline in the Air Quality Impact Assessment (Mott MacDonald, 2020) would not be considered representative due to Covid-19.	Consult with the Ashford Borough Council EHO regarding the proposed methodology
	However, some of the baseline information could be used as the basis for an ADMS model with the traffic data produced by the transport team. Model parameters e.g. met station used in the 2020 assessment, would remain unchanged.	
Noise and ∀ibration	The baseline in the Noise Impact Assessment (Mott MacDonald, 2020) would not be considered representative due to Covid-19. The desk-based assessment did not include any measured baseline noise data predevelopment and did not take account of railway noise.	Consult with the Ashford Borough Council EHO regarding the proposed methodology
	The traffic data, produced by the transport team, will be used to determine baseline noise levels for day and night. This would be supplemented by noise data from near to the railway line.	
Ecology	The baseline within the Biodiversity Assessment (Mott MacDonald, 2020) was informed by a compilation of data from previous surveys (2021 - 2019), and a walkover in May 2020.	Consult with Ecological Officer at Ashford Borough Council / Kent County Council
	Since this time, the IBF has been implemented and monitoring surveys have been undertaken, as a condition of that planning permission, the last of the surveys were in 2023. This monitoring data would be used in the assessment, rather than being relied upon as part of the baseline.	
Ground Conditions and Contamination	The Geotechnical & Geo-environmental Desk Study (Mott MacDonald, 2020) was informed by previous studies and ground investigation data (2010 – 2016) and Phase 1 Assessment & Preliminary Geotechnical Assessment in	Consult with the Ashford Borough Council EHO regarding the proposed methodology



Topic	Baseline to be utilised for the application (refer to documents to be referenced)	Next Steps (consultation required)
	It is anticipated that the data, contained within the 2020 reports, will be used and referred to.	
Flood Risk and Drainage	The baseline in the Flood Risk and Drainage Strategy (Mott MacDonald, 2020) will be used and referred to.	Approach to be agreed through EIA Scoping process
Historic Environment	Baseline data, within the Cultural Heritage Assessment (Mott MacDonald, 2020) can be drawn upon for the new application.	Consult with the Kent County Council Heritage officer to confirm no further archaeological mitigation fieldwork is required and what stage the post-excavation is at.
	The baseline would be supplemented with up-to-date Historic Environment Record (HER) search and updated National Heritage List for England (NHLE) data, and historic mapping.	Preparation of separate archaeological desk-based assessment (if required), and Heritage Statement to support the application. Consultation with KCC Heritage Team and Historic Environment on scope.
Landscape and Visual	It is anticipated that the baseline views, which accompany the Landscape and Visual Impact Assessment (Mott MacDonald, 2020) would be used for the new application.	Approach to be agreed through EIA Scoping process
Socio-economics	No socio-economic assessment was submitted with the SDO application. Data relating to social infrastructure, such as schools and healthcare would not be relevant to this application. As such, relevant census and employment data will be collected and used in the baseline.	Approach to be agreed through EIA Scoping process

Assessment Scenario

As noted above, the Sevington IBF is built and currently operational, as such, the effects from the construction phase have already occurred and would no longer apply to this new application. It is proposed that the assessment of construction impacts is 'scoped out' of the EIA. The environmental studies which accompanied the SDO application in 2020 assessed the effects associated with the construction and operation of the IBF (the operational effects being temporary and reversible). As the current application proposes to make this a permanent facility, the EIA will consider only the continued operation (permanent and non-reversible).

To ensure a robust assessment, each of the technical disciplines will undertake their respective environmental assessments in accordance with the latest methodology and guidance within their technical field. This will be clearly set out within the EIA Scoping Request.

Further Environmental Studies

Beyond the ES, other reports would be prepared to accompany the application, these are subject to discussion and agreement with ABC, and may include:



- Travel Assessment and Travel Plan
- Habitats Regulations Assessment
- Biodiversity Net Gain Assessment
- Operational Waste Management Strategy
- Arboricultural Impact Assessment
- Preliminary Environmental Risk Assessment (PERA)
- Flood Risk Assessment
- Sustainable Drainage Strategy
- Spatial Coordination (below ground structures)
- Lighting and Utilities

Any consultation required for agreeing assessment methodology and scope will be undertaken directly with statutory consultees for the above studies.

EIA Scoping Request

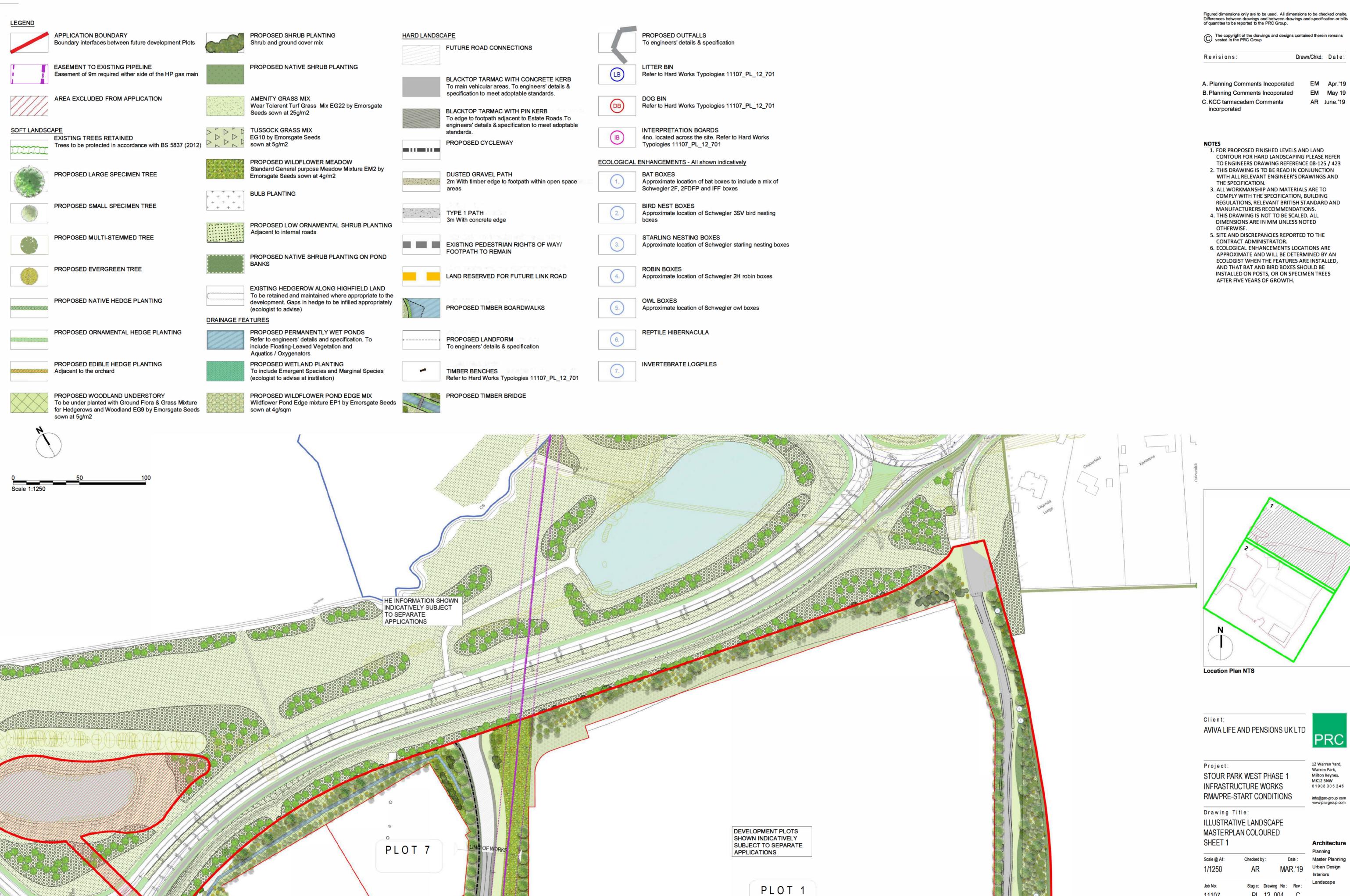
An EIA Scoping Request will be submitted to ABC to confirm the topics to be assessed, as well as the baseline to be considered and assessment methodology for each technical area.

Therefore, the structure and contents of the ES would be agreed with ABC through the EIA Scoping process.

---END---



Annex A: Phase 1A Works of the Extant Outline Scheme



For continuation refer to drawing III07_PL_I2_005 General Arrangement - Sheet 2 of 2

PLOT 6

Figured dimensions only are to be used. All dimensions to be checked onsite.

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Drawn/Chkd: Date:

EM Apr.'19 AR June.'19

1. FOR PROPOSED FINISHED LEVELS AND LAND CONTOUR FOR HARD LANDSCAPING PLEASE REFER

2. THIS DRAWING IS TO BE READ IN CONJUNCTION

3. ALL WORKMANSHIP AND MATERIALS ARE TO COMPLY WITH THE SPECIFICATION, BUILDING REGULATIONS, RELEVANT BRITISH STANDARD AND

APPROXIMATE AND WILL BE DETERMINED BY AN ECOLOGIST WHEN THE FEATURES ARE INSTALLED, AND THAT BAT AND BIRD BOXES SHOULD BE INSTALLED ON POSTS, OR ON SPECIMEN TREES

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PL 12_004

Issue Status:

Construction Preliminary Information Approval