



Leader's Office
White Cliffs Business Park
Dover
Kent CT16 3PJ

Telephone: (01304) 821199
Fax: (01304) 872452
e-mail: cllr-trevor.bartlett@dover.gov.uk
Website: www.dover.gov.uk

Rt Hon Grant Shapps MP
Secretary of State for Transport
Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

Councillor Trevor Bartlett
Leader of the Council

Direct Line: (01304) 872090
Our Ref: RG/LJ/TB/DJD
Your Ref:
Date: 10 February 2021

Dear Mr Shapps,

Re: Government preparations for the end of the transition period with the EU - White Cliffs Inland Border Facility

I would like to thank you for the opportunity you have given to Dover District Council as part of the engagement process to respond as the Local Planning Authority with regards to the proposal to establish an Inland Border Facility (IBF) at White Cliffs Business Park, Dover.

I have attached a copy of the detailed report prepared by my planning team in relation to this proposal, which includes the following recommendations:

That DDC as LPA would wish to see amendments to the scheme, or for additional information to be provided to address the following matters:

- a. that a mitigation package of highway improvements to reduce congestion and improve safety at the Whitfield Roundabout and Duke of York Roundabout is included with the submission for Relevant Approval and implemented to a programme to be agreed with the relevant authorities;
- b. that the initial security / check in post for HGVs, before the HMRC and DEFRA inspection areas, is repositioned to the south of the swim lanes, to reduce/eliminate any risk that HGVs queuing at this security / check in post might back up onto the new access roadway and wider road network with the potential to cause severe congestion including to Dover Fastrack buses;
- c. that a bus gate, controlled by Automatic Number Plate Recognition (ANPR) cameras, is installed on the new access roadway to control and limit the Dover Road access to authorised buses and emergency vehicles only.
- d. that the access to the DEFRA staff car park also be available for those using the HMRC car park, to avoid conflict between staff vehicles and HGVs at the main HGV entrance;
- e. that a robust sensitivity analysis is carried out for ferry arrivals at the Port of Dover, where two or more ferries arrive close together, in respect of the resultant HGV movements and highway impacts to inform the off-site highway improvements identified at a;

- f. that details of traffic signage and routing controls are provided with the submission of information for Relevant Approval to include real-time advance electronic directional signage showing any operational issues at the site;
- g. that fast charge electric vehicle charging points are provided for the staff car parks at one for every 10 spaces & that electric hook up points are provided for refrigeration units of trucks.
- h. that a fully detailed proposed LED lighting scheme (including lux plot) is included with the submission for Relevant Approval, so landscape and visual impacts of the proposed IBF can be properly considered, and that no lighting is provided to the east of the lorry parking areas and no columns exceed 8m in height. The scheme should make specific reference to Institute of Lighting Engineers Guidance Document 'Guidance Note 1 for the reduction of obtrusive light 2020' whereby residential areas in Guston are considered E2 Rural Low district brightness (Sparsely inhabited rural areas, village or relatively dark outer suburban locations).
- i. that the height of the landscaped bund to the west of the houses on Dover Road / St Martin's Road is increased to at least 3m; and that the bund incorporates denser evergreen planting at lower and higher levels to ensure the proposed IBF is fully screened from the outlook of those residents;
- j. that a more biodiverse planting scheme, which would further help screen the operational development, is provided across the areas currently identified as 'cut grassland' and 'amenity grassland' to include further areas of woodland edge planting to the east of the bund and west of the swim lanes;
- k. that tree planting is increased along the route of the proposed new roadway/BRT route;
- l. that the 2m security fence is re-positioned to inside the bund so it is not visible to nearby residents and users of the realigned North Downs Way National Trail;
- m. that an acoustic fence is positioned along the eastern edge of the HGV parking area, to help attenuate any noise from that area; the fence and buildings should be designed such that there is minimum 'line of sight' from residential properties in St Martins Road.
- n. that the HGV parking area is managed so vehicles are sequentially parked as far west into the Site as possible;
- o. that the HGV parking area is only lit in areas where vehicles are parked and only where and when it is necessary to do so;
- p. that the appearance of all buildings are agreed with the LPA before being constructed and materials of the buildings are sympathetic to and would blend into the surrounding landscape, and would be least obtrusive in views across the Site and are not higher than 8m;
- q. that a measurable biodiversity net gain of at least 10% is achieved against the DEFRA metric;
- r. that further engagement with DDC on matters of noise, air quality, lighting and contaminated land is required before the submission for relevant approval;

- s. that there is meaningful engagement with DDC on the information and detail that is to be provided as a 'construction management plan', 'operational management plan' and site specific 'dust management plan' as referenced as mitigation in the air quality report (WSP 70077720-AQ). This should include real-time PM10 monitoring to begin as soon as possible before the commencement of works.
- t. tree planting to provide shade and relief from the sun is provided across proposed areas of hardstanding wherever possible;
- u. the proposed buildings on the Site achieve at least a 31% reduction in carbon emissions below the Target Emission Rate (TER) as set out in Building Regulations Part L (2013)
- v. the proposed buildings meet a BREEAM 'Very Good' standard overall, including Very Good for addressing maximum energy efficiencies under the energy credits;
- w. water efficiency measures are included to achieve the relevant BREEAM water credits;
- x. through consultation with KCC as Lead Local Flood Authority, the surface water drainage system includes appropriate allowances for climate change.
- y. That the WWII pill box is preserved.
- z. Noisy works of construction should only take place during the following hours
 - i. 8am-6pm Monday-Friday
 - ii. 8am-1pm Saturday
 - iii. No time at all on Sundays or Public Holidays.
 - iv. Prior consent for works should be applied for under Section 61 of the Control of Pollution Act 1974.
- aa. There should be a requirement to produce a stakeholder communications plan that includes community engagement before work commences
- bb. Mitigation measures should include discussions with DDC to establish appropriate access and haul routes for construction traffic.
- cc. Prior to commencement of the development a desk top study for contamination shall be undertaken and submitted to and approved in writing by the Local Planning Authority. The study shall include the identification of previous site uses, potential contaminants that might reasonably be expected given those uses and any other relevant information. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall also be included.
- dd. That in the event of an alternative layout being proposed for submission for SDO approval that a further period of engagement to ascertain DDC's views is agreed
- ee. That in the event of the proposed access arrangements being amended that any such amendments fully align with the proposed Dover Fastrack scheme or that it is clear how such an alignment will be achieved.

The Council seeks early reassurance on the matters outlined above and I would welcome an early meeting with you to discuss how we can work together to resolve these concerns.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'T. J. Bartlett', with a long horizontal flourish extending to the right.

Cllr Trevor Bartlett
Leader of the Council

cc Natalie Elphicke MP
 Barbara Cooper, Kent County Council
 Haroona Chughtai, DfT