

PROPOSED RESPONSE TO THE ENGAGEMENT EXERCISE BEING UNDERTAKEN BY THE DEPARTMENT FOR TRANSPORT ON PROPOSALS TO ESTABLISH AN INLAND BORDER CONTROL FACILITY AT THE WHITE CLIFFS BUSINESS PARK

1. Since the Planning Report (**Appendix 3** to this agenda) on this matter was published a number of issues have arisen that Officers need to update Members on.
2. Firstly, in respect of recommendation c, officers have liaised regarding the details of the Dover Fastrack scheme, and it is understood that the agreed bus gate details to be installed for that scheme comprise Automatic Number Plate Recognition (ANPR) enforcement. Accordingly, the recommendation in this respect should be amended to propose this as follows:-
 - 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”.
3. In addition, views have been received from Environmental Health on the draft Noise and Air Quality reports submitted. These comprise a detailed technical assessment of those reports which can be supplied to the DfT, but in summary they conclude that further work is required on both reports, particularly in light of the amended plan shown last night which has not been incorporated in to our comments (although they recognise that the amendments result in an improvement in terms of noise). A report on Contaminated Land is still awaited. Additional recommendations suggested are as follows:-
 - z. Noisy works of construction should only take place during the following hours
 - 8am-6pm Monday-Friday
 - 8am-1pm Saturday
 - No time at all on Sundays or Public Holidays.
 - 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.

In addition a number of changes to existing recommendations are proposed to deal with Air Quality issues (additional text is in red).

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).

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.

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.

3. At a meeting arranged by the DfT on Monday afternoon of this week, at which a number of Members, Officers and other interested parties were present, the DfT tabled an amended layout plan and section through the site. By way of introduction it was indicated that these plans were a response to issues raised by local residents in relation to the visibility of the site from their properties and noise issues. It was unclear whether the plans were being proposed as a substitute for the plan at **Appendix 2** of this agenda or one possible solution to those issues. The plans have not been sent to the Council as part of the engagement exercise.
4. These plans show a number of significant amendments to the scheme, some of which are as follows.
 - a) The extent of the area to be developed has increased in an easterly direction towards the Dover Road.
 - b) The areas proposed for DEFRA/HMRC buildings and for lorry parking to the east of Roman Road have been swapped so that to some extent the lorry parking areas are now screened from views from the east by buildings.

- c) The proposed bund referred to in the report has been moved westwards adjacent to the buildings and increased in height to 4m – the north/south extent of the bund is unknown.
 - d) In response to questions it was stated that the security fence has been moved to the west of the bund so that it is screened by it.
 - e) Additional areas of landscape have been introduced. Areas for SUDS have been streamlined.
 - f) Of most significance are the amendments to the proposed access arrangements. Only one access to the site is now shown for all traffic (HGV's/cars) both entering and leaving. This would still involve a 4th arm being created to the B&Q roundabout together with a short section of road which would enter the site slightly further north west than originally proposed. The remainder of the road proposed originally, which followed the alignment and details shown in the Dover Fastrack application, has been deleted.
5. As indicated above, the plans have not been sent to the Council as part of the engagement exercise, and their status is unclear. In terms of dealing with some of the issues identified in officers original recommendations they may have some potential to resolve visibility of the operations and noise as EH recognise (recommendations i, l and m) but a more detailed examination by Officers is necessary to confirm that.
6. Of potential concern however are the revised access arrangements. The earlier report to Council at **Appendix 3** proposed that car and HGV access were separated in their entirety to reduce potential conflict and delay between the different types of vehicle; the revisions result in increased likelihood of traffic backing up onto the Dover Fastrack Road and Honeywood Parkway. In addition putting all movements onto one access reduces flexibility in the event of such conflict or an emergency. Access for emergency vehicles was previously proposed to be from the eastern (Dover Road) end of the Fastrack Road using bus gate control.
7. Furthermore, the new access road details appear at first glance to be incompatible with the proposed alignment of the Dover Fastrack road. If that is the case, it is unclear how such conflict would be resolved should both sets of proposals be agreed. The implementation timescales for both projects are some months apart and it is assumed it would be necessary to demonstrate that IBF operations would not be affected by such differing timescales.
8. Officers therefore additionally recommend as follows:-
- 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.

ff. that the proposed Operational Management Plan is sent to DDC as soon as possible so that emergency access arrangements and other factors affecting the Dover Fastrack road can be agreed.