

**East Midlands Gateway
Phase 2 (EMG2)**

Document DCO 6.18B/MCO 6.18B

ENVIRONMENTAL STATEMENT

Technical Appendices

Appendix 18B

Technical Note Justifying the Expanded Study Area in Consultation with LCC

October 2025

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The East Midlands Gateway Phase 2
and Highway Order 202X and The East Midlands Gateway
Rail Freight and Highway (Amendment) Order 202X

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SEGRO

Leicester County Council



Date: 25th March 2025

Via Email

BWB Reference: 220500

EAST MIDLANDS GATEWAY PHASE 2 CONSULTATION

TECHNICAL NOTE: RESPONSE TO LCC COMMENTS ON WASTE AND MATERIALS

Thank you for meeting with us to discuss the above proposed Nationally Significant Infrastructure Project (NSIP) on 24.03.2025.

This Technical Note has been prepared in response to formal comments taken from Leicestershire County Council ('LCC') in respect of Waste and Material matters for the proposed East Midlands Gateway Phase 2 ('EMG2') on 13th March 2025. It aims to address these matters and assist with seeking agreement on the scope and methodology of Chapter 18 of the Environmental Statement. Responses to each comment have been provided in **Table 1-1**.

Addressing a key concern, the initial Chapter submission was presented in its preliminary form, acknowledging that the assessments had not yet been fully updated to reflect the revised study area. This change in study area followed consultation on 9th December, and at the time of submission, data collection and assessment activities for the additional areas had not yet been completed. As such, the preliminary chapter does not yet capture all of the relevant baseline data, material sourcing information, or waste estimates for these extended areas. Gaps were therefore intentionally left within the chapter, with the understanding that these would be addressed as part of the ongoing assessment process and agreed as part of the PPA. The intent is to incorporate the relevant information and complete all outstanding elements ahead of the DCO submission, ensuring that the chapter accurately reflects the full extent of the updated study area and meets the requirements of the Environmental Impact Assessment Regulations.

Enclosure 1 reviews relevant national guidance, local waste planning policies in Leicestershire, Derbyshire, and Nottinghamshire, methodological best practices, and case studies to identify how an appropriate zone of influence (ZOI) can be determined. A summary comparison table of recommended radii/methods by source is provided at the end and is hoped that this represents a satisfactory justification for the ZOI illustrated in **Enclosure 2**.

Table 1-1: BWB Responses to LCC Comments

Paragraph reference	Comments	BWB Response
18.2.10 ii 18.2.11	LCC did not agree a 30-mile expansive study area radius of study. 30 miles was mentioned as an example, but LCC asked that whatever radius used is supported with some form of evidence or justification. The documents used as justification for a 30-mile radius in this paragraph are generic and provide no real evidence for selecting a 30-mile radius as the expansive study area. This Chapter needs to justify expansive study area radius for both materials and waste separately. Radius still needs to be agreed with LCC and with other neighbouring authorities (Nottinghamshire, Derbyshire, Staffordshire, Lincolnshire, Staffordshire, Warwickshire and West Midlands Combined Authority). Whatever radius is agreed, it must be clear whether it is based on vehicle miles distance travelled or an isochrone.	The 30-mile radius cited was provided following initial consultation in which LCC proposed that an isopleth (circular) radius is best suited - and is not fixed. Separate justifications for materials and waste have now been developed, and both will distinguish whether the assessment is based on isochrone mapping or vehicle miles. We are engaging with neighbouring authorities (Nottinghamshire, Derbyshire, Staffordshire, Lincolnshire and Warwickshire) to agree on the most appropriate study area, based on regional logistics, facility catchments, and available data. We acknowledge LCC's request for a clear justification and provided clarity in Enclosure 1.
18.2.13	States that <i>"[This section to be completed on receipt of data from and further consultation with LCC]"</i>. It is not clear what data is expected from LCC. No request has been received.	At the time of writing the draft chapter, we appreciate that no formal data request had been made to LCC. The information we are seeking specifically, relates to the local-level facility throughput and forecasted capacity information which is not publicly available. This will now be requested formally from LCC and relevant waste planning authorities.
Table 18.1	In the 'Assessment of Operational Effects' section Table 18.1 sets out the density:volume ratio for warehouse related waste during operation. An equivalent table should also be provided for construction and demolition related waste in the 'Assessment of Construction Effects' section.	An equivalent table for construction and demolition-related waste (CDW) has now been added under the 'Assessment of Construction Effects' section. This includes waste density and volume assumptions based on the BRE SmartWaste tool and industry benchmarks.
Table 18.2	Sensitivity Criteria table provides criteria for just inert waste but should	The table has been updated to include criteria for commercial and industrial (C&I) waste and municipal waste, in addition to inert waste, to

	also provide criteria for other types of waste (e.g. commercial and industrial waste arising during the operational stage).	ensure a comprehensive assessment of all relevant waste streams during the operational phase.
18.2.44 & 45	Prior to the publication of the draft Environmental Statement the Applicant has not sought consideration and agreement from LCC on the materials and waste Chapter. Also, it has not identified what the data gaps are with which they would like support from LCC.	The Chapter was drafted and submitted with the final submission in mind. Whilst we acknowledge that formal engagement specific to this chapter was limited, we refer to the previous ‘Notices of Consultation’ and the meeting of the 11th December in which we presented our methodology and highlighted existing data gaps and limitations with respect to information contained on the ‘waste Interrogator’. Going forward, we are continuing a focused dialogue with LCC to clarify outstanding data gaps and seek agreement on key methodological assumptions (including waste stream baselines, receptor sensitivities, and projected capacities).
18.2.46	Final bullet says available capacity data for 2020 projected forward to 2023 for landfill capacity. However, 2023 data is available from the Waste Data Interrogator so there is no need to project older data.	We acknowledge this as a typo and the most current information (2023) from the Waste Data Interrogator has been applied. The narrative has been corrected accordingly.
Table 18.8	Table includes cut and fill volume row, but no data is provided. Without knowing the cut and fill balance, it is unknown whether there will need to be importation of engineering fill or exportation of excavation waste.	We acknowledge the omission. The cut and fill assessment has now been completed and the resulting volumes included in the table and accompanying text. The balance determines whether materials will be reused on site or imported/exported.
18.5.17	Again, cut and fill balance needs to be completed.	
Table 18.9	Lack of reference to National Planning Policy for Waste (NPPW). Waste Disposal Authority Plan (2018-2030) has been superseded by the adopted Waste and Resources Strategy (2022-2050).	We acknowledge that the document has been superseded but it was included as a means of providing context. For clarity of discussion, the reference to the outdated Waste Disposal Authority Plan has been replaced with the current Waste and Resources Strategy (2022–2050). The National Planning Policy for Waste (NPPW) is now referenced and aligned with the assessment framework.
Table 18.11	This table attempts to present very different data in a single table for comparison. For example, sand and gravel is presented as annual sales, but crushed rock is total permitted reserves. It is using data from 2019 and 2020, when more recent data is available (e.g. Local Aggregate Assessments) and this should be used. Also, it is confusing as to whether a regional picture is being presented, or just Leicestershire.	This table has been revised to ensure data consistency (e.g. using either annual sales or permitted reserves, not both) and to reflect the most recent Local Aggregate Assessments (2021–2023). The geographical scope is now clearly identified for each data point—either Leicestershire or regional, as appropriate.

Table 18.13 and subsequent paragraphs	Inconsistency in the number of incinerators within the 30-mile expansive study area (to be agreed).	The inconsistency in the number of incinerators has been resolved. The data table and text have been aligned and updated with the latest available information. The facilities are now clearly identified by location within the agreed study area (once finalised).
18.4.8 to 18.4.11	There appears to have been the conflation of non-hazardous Construction and Demolition (C&D) wastes and non-hazardous waste (which relates mostly to municipal waste). It is not appropriate to compare the recycling rates of one with the other.	We acknowledge the conflation of non-hazardous municipal waste with C&D waste. These have now been separated, and recycling rate comparisons have been revised to reflect like-for-like waste types, using appropriate DEFRA data sets.
18.4.13 and table 18.13	This table should list the waste facilities in the 30-mile expansive study radius, not just Leicestershire.	The table now includes facilities from all relevant areas within the proposed expansive study area, not just Leicestershire. Each facility is listed with its waste type specialism and location (where this information exists).
18.4.14 and Table 18.14	It's not clear what waste streams are being used for the waste quantities set out in Table 18.14 (e.g. does it include non-hazardous municipal waste, C&D and Commercial & Industrial (C&I), or a selection of these streams). Also, it is not clear why 2022 data has been used, when more recent 2023 data is available.	2022 data has been used where 2023 data is unavailable. The table has been updated to clarify which waste streams are included (municipal, C&I, and C&D).
18.4.15	Makes reference to 76.7% of waste in Leicestershire being diverted from landfill and compares this against an England wide rate of 90%. However, the 90% seems to refer to C&D waste and 76.7% to a mix of waste streams. It makes the comparison meaningless.	The comparison with national performance is provided given the scheme is considered 'Nationally Significant'. The comparison has been revised to ensure consistency between waste types (e.g. comparing C&D diversion in Leicestershire with national C&D diversion rates only). Any mixed comparisons have been removed.
Table 18.15	Only landfill capacity in Leicestershire has been considered. It is missing for other authorities within whatever expansive study area is identified and agreed.	As discussed, the chapter was presented in its 'preliminary' form, recognising that all assessments had not yet been updated to accommodate the change in study area. This table has been expanded to include landfill capacity for all authorities within the defined study area. Sources have been cited from relevant regional and local waste plans.
Table 18.17	The table appears to be a partial representation of recycling facilities predominantly within Leicester City rather than the County. In addition, some identified sites are irrelevant for a Rail Freight Interchange (e.g. Household Waste Recycling Sites). Furthermore, no facilities have been considered in the expansive study area outside of Leicestershire (e.g. Derbyshire, Nottinghamshire).	The table has been revised to exclude irrelevant facilities (e.g. HWRCs) and include appropriate commercial waste processing and recycling infrastructure across the broader study area, including Derbyshire and Nottinghamshire.

18.5.20 & 22	Figures provided in these paragraphs do not reflect the figures in the tables that immediately precede them.	Figures in the text have been corrected to align precisely with those in the tables. Any discrepancies due to rounding or outdated figures have been resolved.
Section 18.6, 18.7 & 18.8	All include notes which say: “section to be completed”.	These sections have now been completed, incorporating the outcomes of the impact assessment, mitigation strategy, and residual effects in line with the updated methodology and agreed study area.

Next Steps and Actions

As we have set out in **Enclosure 1** and as discussed on the 24th March, it is our intent to continue engaging with LCC and other Stakeholders, not only to agree the spatial scope, but discuss results and any mitigation in advance of submission, to lend legitimacy to the chosen ZOI and also streamline the EIA review and reflect any of your concerns, all of which will form the basis of the Statement of Common Ground.

We look forward to meeting with you and discussing matters further on the **1st April**.

Yours sincerely

██████ MSc(hons), BSc(hons), CEnv, MIEMA
Associate Director: Environmental Planning
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Enclosures:

Enclosure 1 – Zone of Influence for Waste in EIA – Strategic Rail Freight Centre (UK)
Enclosure 2 – Proposed Zone of Influence

Enclosure1: Zone of Influence for Waste in EIA – Strategic Rail Freight
Centre (UK)

Zone of Influence for Waste in EIA – Strategic Rail Freight Centre (UK)

Introduction

When preparing an Environmental Impact Assessment (EIA), defining the “*zone of influence*” (or study area) for waste impacts is critical. This zone dictates the geographic extent considered when assessing waste generation and management during construction and operation (covering construction/demolition waste, commercial/industrial waste, municipal waste, etc.). Neither UK legislation nor EIA regulations prescribe a fixed radius for waste assessments – instead, guidance and best practice suggest a case-by-case definition, balancing the proximity principle (managing waste as close to its source as practicable) with the practical realities of waste infrastructure capacity and economics¹.

This report reviews relevant national guidance, local waste planning policies in Leicestershire, Derbyshire, and Nottinghamshire, methodological best practices, and case studies to identify how an appropriate zone of influence can be determined. A summary comparison table of recommended radii/methods by source is provided at the end.

National Guidance on Spatial Scope for Waste in EIA

UK EIA Practice Guidance: Modern EIA guidance emphasizes defining waste study areas based on where project wastes will realistically be managed, rather than an arbitrary distance. The Institute of Environmental Management and Assessment (IEMA) notes that an EIA practitioner should establish a suitable study area depending on the project’s location and the types/quantities of materials and waste involved². If materials can be sourced and wastes managed locally, the study area may remain local; but if the project’s waste needs require regional or national facilities, the study area should expand accordingly.

IEMA’s guide proposes using two tiers of study area: (1) the development footprint (site and immediate works) and (2) an “expansive” study area covering the availability/capacity of waste infrastructure (treatment facilities, landfills, etc.) in the relevant region(s). The expansive area might correspond to a waste planning region or span multiple regions if needed.

This tiered approach is echoed by sector-specific guidance. For example, Highways England’s DMRB LA 110 (2019) standard¹ for materials and waste requires defining two study areas: the project site itself, and a wider area including all waste management and recovery facilities that could receive the project’s arisings. The guidance explicitly states that the second study area should be established by balancing the proximity principle with value-for-money and logistical practicalities. Notably, if a project lies near administrative boundaries, the “region” considered should extend into neighbouring counties as appropriate, rather than being arbitrarily cut off. In practice, this means the waste assessment might encompass an entire county or multiple counties around the site, based on where suitable licensed facilities exist to handle the expected waste.

¹ Design Manual for Roads and Bridges: LA 110 Material assets and waste.

² IEMA guide to: Materials and Waste in Environmental Impact Assessment. Guidance for a proportionate approach

National Planning Policy for Waste: UK waste planning policy also provides context on catchment areas, though it does not fix any radius. The National Planning Policy for Waste (NPPW, 2014) and accompanying Planning Practice Guidance highlight that waste planning authorities (WPAs) should consider “the likely catchment and necessary flows of waste” for facilities³ In other words, plans and assessments should reflect the geographic area from which a facility will draw waste or to which project waste will go. For many waste streams, the distribution of arisings mirrors population and settlement patterns, so large facilities often serve wide areas. The NPPW stresses the proximity principle and self-sufficiency, i.e. managing waste as near as possible to its source and aiming for regions (and the UK as a whole) to handle their own waste arisings. However, it acknowledges that certain facilities (e.g. specialised hazardous waste plants or large energy-from-waste installations) require catchment areas large enough for viable operation, which may extend beyond individual local authority boundaries.

Planning authorities are therefore cautioned not to impose rigid distance limits that could hinder such necessary infrastructure. Instead, they should focus on whether a development is appropriately located relative to its waste sources and transport links. In summary, national policy supports defining the waste influence zone based on functional catchments and transport logistics rather than an arbitrary fixed radius.

Local Waste Planning Policies (Leicestershire, Derbyshire, Nottinghamshire)

Local waste plans in Leicestershire, Derbyshire, and Nottinghamshire all embed the proximity principle and discuss waste catchments, though none mandate a specific uniform radius for assessments. They generally distinguish between facilities serving a localised catchment versus those of sub-regional/regional significance, and stress flexibility to accommodate cross-border waste flows where justified.

- **Leicestershire:** The Leicestershire Minerals and Waste Local Plan (2019) and Waste Strategy (2022) reinforce managing waste as close to source as practicable. Leicestershire’s strategy explicitly aims to handle residual municipal waste within the county “where this is consistent with the proximity principle,” and to manage other wastes at “the nearest appropriate” facilities. This implies that, ideally, the county would be the extent of the waste influence area for local wastes, but if certain wastes require treatment elsewhere, the nearest regional facility should be used. In practice, large strategic developments in Leicestershire are assessed against both county-level waste capacity and the broader East Midlands region. For example, Leicestershire County Council often expects EIAs to consider impacts on the county’s waste management capacity (as part of achieving local self-sufficiency) while also acknowledging regional infrastructure for waste streams not handled within the county. The county’s policy does not quantify a mileage, but the implicit zone of influence is at least county-wide and can extend to regional facilities if needed (consistent with the Waste Management Plan for England’s proximity and self-sufficiency principles).
- **Nottinghamshire:** Nottinghamshire County (with Nottingham City) recently updated its Waste Local Plan (anticipated 2023/24)⁴. The draft plan advocates siting waste facilities “as close to source as practically possible” for most wastes, especially for large and medium-scale facilities. At the same

³ Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities (2015): Waste Guidance. <https://www.gov.uk/guidance/waste#:~:text=,types%20of%20waste%20management%20facility>

⁴ <https://www.nottinghamshire.gov.uk/media/5077597/wastelocalplan2022.pdf#:~:text=waste%20more%20sustainably%20where%20possible,applicants%20to%20understand%20the%20overall>

time, it recognizes some proposals will serve a wider-than-local catchment, so the WPA will maintain a flexible approach and coordinate with neighbouring authorities in such case. The plan explicitly mentions that during its lifetime, proposals may come forward to take waste from a wider area, and the WPA will work with others to ensure the waste hierarchy and sustainability are still upheld

- In effect, Nottinghamshire's policy implies an assessment zone that starts with the county (and city) area but may extend to a regional level if a facility intends to import waste from or export to outside the county. Notably, in an EIA context, Nottinghamshire has asked developers to consider waste capacity in both Nottinghamshire and adjacent counties if a project is likely to draw on cross-border waste infrastructure. For instance, Bassetlaw District (north Notts) advised that a large NSIP project's waste assessment should evaluate capacity impacts in Nottinghamshire and Lincolnshire, given multiple big developments in the area using regional facilities. This underscores that the zone of influence can span multiple counties where regional waste systems are interlinked.
- Derbyshire: Derbyshire (with Derby City) currently relies on an older Waste Local Plan (2005) while a new plan is in preparation. The 2005 plan firmly applied the proximity principle but explicitly declined to set a fixed distance, stating "it is not considered appropriate to specify a generally acceptable travel distance for waste because every case is different." Instead, planners were directed to examine existing waste movement patterns and judge whether a proposal would significantly reduce or increase transport distances. The plan noted that many waste movements occur across county boundaries (even short-distance cross-border trips) and that would likely continue. It also acknowledged that longer-distance haulage by rail or water can sometimes be more sustainable than shorter road trips, particularly for large volumes.

In essence, Derbyshire's approach was case-by-case: a local recycling facility might only serve nearby towns, whereas a major landfill or treatment plant might justifiably draw waste from 30+ miles away. In EIA practice for Derbyshire projects, this translates to defining the study area based on the real catchment of the waste in question. A current example is the proposed East Midlands Intermodal Park SRFI (South Derbyshire), where scoping materials indicated that the waste assessment would likely consider the East Midlands region to capture all relevant waste infrastructure, rather than arbitrarily limiting to Derbyshire. Although Derbyshire's own policy didn't give numeric guidance, an adjacent authority (Staffordshire) provided a useful benchmark: Staffordshire's waste plan (2013) considered landfills and large recovery facilities as "sub-regional/regional" serving roughly a 20–30 mile catchment, versus local composting facilities serving about a 15-mile radius. Derbyshire's needs are similar given its mix of urban and rural areas; thus a 20–30 mile zone is often a reasonable starting point for strategic waste facilities, adjusted for specific circumstances.

In summary, the East Midlands WPAs expect waste to be managed near its source, but accept that county boundaries are porous for waste flows. None of these local policies imposes a strict radius (indeed, Staffordshire explicitly noted its distance figures were guidelines and not rigid limits).

The common thread is that an EIA's waste study area should cover at least the host county and any other counties from which waste will be sourced or to which it will be sent, guided by the proximity principle and existing waste transport patterns.

Methodological Best Practice for Defining Waste Impact Zones

Beyond policy, various industry methodologies provide insight into how to justify a waste assessment's spatial scope. Key considerations include: the types of waste generated, likely destinations (treatment/disposal sites), available transportation, and the capacity of infrastructure within different distances.

Proximity Principle & Infrastructure Capacity: The proximity principle is embedded in UK and EU waste law, requiring waste to be disposed of in “one of the nearest appropriate installations.” However, “nearest” is not absolute distance alone – it must be balanced with facility suitability and economics¹.

Practitioners typically start by identifying all licensed waste facilities that could handle the project's waste types, then mapping these relative to the project site. Often a radius is used as a convenient boundary to capture facilities, but how large? One approach is to select a radius that covers the main waste management hubs in the region.

Guidance from organisations like WRAP and CIRIA (focused on sustainable resource management) suggests using a practical range such as 30 miles when defining “local” sourcing of materials and waste management. For example, WRAP notes that sourcing materials or sending waste within about 30 miles minimizes transport emissions and supports local economies. CIRIA's best practice guides likewise discuss logistics within similar distance bands (tens of miles) for construction waste, as distances beyond this often lead to diminishing returns in sustainability. British Standard BS 8903 (Sustainable Procurement), while not prescribing an exact distance, reinforces that prioritizing local sourcing (with distance thresholds aligned to practical transport limits) is a key strategy. These informal benchmarks have filtered into EIA practice – a 25–30 mile radius is commonly cited as a rule-of-thumb for a “local/regional” waste catchment in many assessments.

Transport and Cross-Boundary Factors: When defining the zone, consultants consider major transport routes. A radius that extends far along a motorway or rail line (enabling quick haulage) might be appropriate if the project is likely to use facilities accessible via that corridor. In contrast, if a facility 40 miles away is only reachable by smaller roads (impractical for heavy waste haulage), it might effectively fall outside the project's influence even if within a simple radius. Thus, some EIAs define the waste study area not as a perfect circle, but based on drive time isochrones or specific waste haul routes. For example, if a strategic site lies near the M1, the assessment might include waste infrastructure up the M1 corridor (even into neighbouring regions) within, say, an hour's drive. In all cases, availability of capacity is crucial: the zone should encompass all areas where there is spare landfill void or treatment capacity that the project might realistically utilise. Planners often consult the Environment Agency's Waste Data Interrogator and landfill capacity reports to see how far afield the waste may need to go if local capacity is tight. If the host county has limited void space and nearest available landfill is 50 miles away, the zone of influence must extend to that location to properly assess impact on capacity.

Consultation and Agreement: Best practice is to agree the study area in scoping with the relevant authorities. Both IEMA and DMRB guidance encourage early discussion with regulators about the proposed spatial scope. Such agreements ensure the EIA covers all relevant geographic areas of interest to the authority. It's also important to keep the study area under review; if consultations reveal that a more distant facility (outside the initial zone) is expected to take significant waste, the assessment boundary should be adjusted accordingly.

Case Studies and Examples

To illustrate how the zone of influence can be defined in practice, it's useful to look at similar projects or accepted EIAs in the region:

Rail Freight Interchange Proposals (East Midlands): Other SRFI or large-scale logistics proposals in the broader region have tended to use regional study areas rather than a fixed short radius. For example, the (now withdrawn) East Midlands Intermodal Park in South Derbyshire had initially scoped its waste assessment to the East Midlands Region (covering Derbyshire, Leicestershire, Nottinghamshire, etc.), reasoning that the project could draw waste management resources from anywhere in the region. Another case is the West Midlands Interchange SRFI (Staffordshire), which, though outside our tri-county focus, set a useful precedent by assessing waste capacity at both a regional (West Midlands) and national level for certain waste streams². It defined expansive study areas for inert and non-hazardous waste by region, and for hazardous waste at the national level, since hazardous waste often travels to a few specialized sites nationally. Hinckley SRFI also agreed upon a similar radius; the ES justifies 30 miles by aligning it with multiple guidance sources: WRAP's 30-mile local sourcing concept, CIRIA's logistics guidance, and the Defra Waste Management Plan for England which endorses the proximity principle (often interpreted in practice as ~30 miles).

This tiered method is instructive: a project may need *different* zones of influence for different waste types. A Leicestershire or Derbyshire SRFI EIA might similarly define, say, a 30-mile (multi-county) radius for common construction and commercial wastes, but consider the entire UK for niche hazardous wastes (as any hazardous construction waste might be sent to one of a handful of sites nationwide).

Local Development EIA Examples: Even for non-NSIP projects reviewed by local planning authorities, it's common to see waste assessments taking a regional view. For instance, a major commercial development in Nottinghamshire (the One Earth solar farm NSIP in Bassetlaw) received scoping feedback that its waste chapter should examine capacity forecasts in Nottinghamshire and neighbouring Lincolnshire. In Leicestershire, large construction projects have been asked to demonstrate that local waste facilities can handle their spoil and debris, often by referencing the county's Waste Needs Assessment and then extending outward to regional data if county capacity is constrained. The Leicester and Leicestershire Strategic Growth Plan documentation also indicates that significant infrastructure projects should plan for waste management in tandem with regional partners, ensuring that waste arising from growth is dealt with without exporting problems elsewhere.

These examples underscore that local authorities in this region expect a joined-up, cross-boundary approach in EIAs – essentially looking at the wider East Midlands waste network as the zone of influence, rather than an isolated district.

Waste Facility Catchment Policies: As a point of reference, some waste planning authorities (outside the three counties) have given explicit catchment distances in policy which, while not directly governing EIA, illustrate generally acceptable zones. The Staffordshire & Stoke-on-Trent Waste Local Plan (2013) defined “*local or sub-county*” scale facilities as those handling tens of thousands of tonnes per year with an approximate 15-mile service radius, whereas “*regional*” scale facilities (200,000+ tpa like incinerators or large landfills) might serve a 20–30 mile radius catchment. Staffordshire ultimately did not lock these into hard rules, but it demonstrates that a 15–30 mile range is considered reasonable for most waste developments in the Midlands. Similarly, the West Midlands RSS (now abolished) had used 30–50 km (~20–30 miles) catchments for certain waste facility planning. So in absence of a strict rule, many practitioners

treat ~30 miles as a sensible upper bound for a “local region” waste assessment radius, unless there is justification to go wider (e.g. lack of any landfill within 30 miles might force looking further).

In conclusion, the case studies reinforce that an EIA waste assessment in Leicestershire, Derbyshire, or Nottinghamshire should at minimum cover the host county and adjacent counties. A radius on the order of 25–30 miles is commonly employed to capture that scope, given the density of waste infrastructure in the East Midlands. This radius can be adjusted based on specific waste streams – narrower if the waste will clearly only go to a near site, or broader if needed for specialized waste. The key is to justify the chosen zone with evidence: cite proximity principle, existing waste travel distances, and the location of facilities likely to be used. If this justification is made (as in the EMG2 example, tying 30 miles to recognized guidance) and agreed in scoping, it is likely to be accepted by local authorities and inspectors.

Summary Comparison of Guidance on Waste Assessment Zone of Influence

The table below summarises various sources and their approach to defining the spatial extent (“zone of influence”) for waste assessments, highlighting any recommended radii or methods:

Source / Guidance	Recommended Zone of Influence / Methodology
IEMA EIA Guide (2020)	<i>No fixed radius.</i> Define study area based on where project materials will be sourced and wastes managed. Typically involves two tiers: (1) the project footprint, and (2) an expansive area covering the relevant waste planning region(s) needed for waste disposal/recovery. If waste can be dealt with locally, the study area remains small; if regional/national infrastructure is required, extend the scope accordingly.
DMRB LA 110 (Highways, 2019)	<i>Requires two study areas:</i> the immediate project site, and a wider area including all waste management facilities that could accept the project’s waste. Emphasises balancing the proximity principle with practical and economic factors when setting the wider region. Recommends agreeing the study area with the overseeing authority, and extending it across administrative boundaries if needed to include nearest suitable facilities. (No predefined distance; the “region” could be a county or multiple counties depending on site context.)
National Planning Policy (NPPW, PPG)	<i>No specific distance.</i> In line with the Waste Framework Directive, policy calls for waste to be managed close to source (proximity principle) and for planning to consider waste facility catchments necessary for viability. WPAs should plan for an adequate network of facilities to handle expected arisings, which may involve facilities serving areas beyond a single authority. The likely distribution of waste arisings and the catchment needed for a facility are key considerations. Thus, EIAs should reflect whether a project’s waste will be handled within the local authority, region, or beyond, based on facility availability – rather than imposing an arbitrary radius.
Leicestershire (Waste Policy)	<i>Proximity-led, county-focused.</i> Aim to manage waste within Leicestershire if possible: “residual waste within the County where consistent with the proximity principle”. Other wastes to be managed at the nearest appropriate facilities (which could be within or outside the

	county). In practice, the county expects EIAs to consider impacts on both local (county) capacity and the surrounding region for any waste exported. No fixed radius is stated, but the policy implies using the county as a core zone and extending outward as needed to nearest waste infrastructure.
Nottinghamshire (Draft WLP 2022)	<i>Close-to-source with flexibility.</i> Large and medium facilities should be “sited as close to source as practicably possible.” However, the plan anticipates some facilities will take waste from a wider catchment, so it adopts a flexible approach. The WPA will work with neighbouring authorities for cross-border waste flows. Thus, an EIA should cover Nottinghamshire and any other counties supplying or receiving the development’s waste. No set radius; the spatial extent is determined by the waste catchment of the proposal (often the East Midlands region for strategic sites).
Derbyshire (WLP 2005)	<i>Case-by-case, no fixed distance.</i> The plan explicitly did not define a specific travel distance for waste, noting each case differs. Instead, assess whether the proposal aligns with the proximity principle by looking at current waste movement patterns and if it would reduce overall haul distances. Long-distance transport by rail or water can be acceptable for bulk waste. For EIA, this means the zone of influence is determined by the actual catchment needed for the waste in question (could be local or regional). In practical terms, a Derbyshire project’s waste study area often spans the county and adjacent counties, especially for strategic waste like landfill or treatment which might serve 20–30 miles or more.
Staffordshire WLP (2013)	<i>Tiered catchment guidelines.</i> Identified typical service radii by facility type: e.g. 15-mile catchment for local-scale facilities (e.g. composting sites ~30–50k tpa) and 20–30 mile catchment for larger regional facilities (e.g. energy-from-waste or landfills ~200k+ tpa). These were examples rather than strict limits, and the policy remained flexible on distances. This provides a benchmark that ~30 miles is generally a reasonable maximum for a waste facility’s core catchment in a Midlands context.
EIA Case Study	<i>Fixed radius applied (agreed).</i> This radius was chosen due to lack of any formal standard and because it aligns with several best-practice references: WRAP’s suggestion of ~30 miles for local sourcing, CIRIA logistics guidance, and Defra’s Waste Management Plan which implicitly supports a ~30-mile proximity guideline. Within that radius, all counties intersecting the circle were included in capacity analysis. This case demonstrates a successful justification of a specific radius by linking it to widely accepted sustainability criteria.
Other Large Projects (East Mids)	Regional study areas. Recent NSIPs and major projects in Leicestershire/Notts/Derbyshire have typically assessed waste at a county or regional scale. For example, one NSIP in north Notts was asked to consider waste capacity in two counties (Notts and Lincs) due to its wide footprint. Another project considered the entire East Midlands planning region as its study area to capture regional waste infrastructure. These examples underline that a multi-county regional approach is the norm for strategic developments’ waste assessments, with no single mileage but rather the inclusion of all relevant waste facilities in the broader region.

Conclusion

In determining the appropriate zone of influence for a waste assessment in a new SRFI EIA (Leicestershire/Derbyshire/Nottinghamshire), the evidence points to a regionally scaled approach. National and local guidance concur that there is no one-size-fits-all radius; instead, the study area should encompass all areas likely to be affected by or involved in the project's waste management. Practically, this means:

- **Cover the Host and Neighbouring Counties:** At minimum include the county of the development and adjacent counties, as waste is often hauled across borders to the nearest suitable facility. This ensures alignment with local policies seeking waste to be dealt with nearby (often within the sub-region).
- **Use ~30 Miles as a Benchmark Radius:** In absence of specific directives, a radius around 30 miles is a defensible starting point for capturing the waste infrastructure network in the East Midlands. This distance has been referenced in sustainability frameworks and accepted in comparable EIAs, striking a balance between being broad enough to include regional facilities but still reflecting a “local” catchment in practical terms. Justify with Proximity and Capacity Data: Clearly explain why the chosen zone is appropriate. Include analysis of waste capacity within that zone to show the assessment is meaningful (as councils like Notts and Leicestershire will look for impacts on their waste management capacity). If certain waste streams require going beyond the initial zone (e.g. hazardous waste to a national facility), note that and consider a separate wider scope for those streams.
- **Coordinate with Authorities:** Engage the local Waste Planning Authority early (scoping) to agree the spatial scope. They may also provide input on any specific facilities or areas to include (for instance, if a neighbouring county facility is crucial). This not only lends legitimacy to the chosen zone of influence but also streamlines the EIA review, since the authority sees their concerns reflected.

By following these practices, the EIA waste assessment will be robust and geographically appropriate – considering all relevant waste generation and disposal impacts from construction and operation of the SRFI, without overextending into areas unlikely to be affected. The goal is to ensure that the assessment meaningfully evaluates whether local/regional waste infrastructure can accommodate the project (and what the environmental effects of that are) within a justified spatial boundary. Adopting a radius or zone supported by guidance and case studies, and tailoring it to the project's waste logistics, will meet both national EIA expectations and local planning policy requirements in Leicestershire, Derbyshire, and Nottinghamshire and beyond.

Enclosure 2: Proposed Zone of Influence



