



Adequacy of Consultation Representation Proforma

Under *Section 55(4)(b) of the Planning Act 2008* (PA2008) the Planning Inspectorate, on behalf of the Secretary of State, must take any adequacy of consultation representation (AoCR) received from a local authority consultee into account when deciding whether to accept an application for development consent, and this will be published should the application be accepted for examination.

An AoCR is defined in s55(5) in PA2008 as “a representation about whether the applicant complied, in relation to that proposed application, with the applicant’s duties under sections 42, 47 and 48”.

Project name	East Midlands Gateway Phase 2
Date of request	22 October 2025
Deadline for AOCR	31 October 2025
Return to	Emgateway2@planninginspectorate.gov.uk

Please complete the proforma outlining your AoCR on the above NSIP.

Local Authority	Leicestershire County Council
------------------------	-------------------------------

In the opinion of the local authority, has the applicant complied with the legislative requirements listed below?

Please note that this is specifically about the statutory consultation(s) undertaken.

Assessment of Compliance - Required	
S42 Duty to consult	Yes / No
S47 Duty to consult local authority	Yes / No
S48 Duty to publicise	Yes / No

If you would like to give more detail on any of the above, please do so below.

Please keep it as succinct as possible and refer to facts and evidence related to consultation, rather than the merits of the application.



Additional comments - <i>Not compulsory</i>	
S42 Duty to consult	
S47 Duty to consult local authority	
S48 Duty to publicise	
Any other comments	Whilst Leicestershire County Council (LCC) was consulted by the Applicant team in line with the requirements outlined in s42 and s47 of the Planning Act 2008, LCC has raised concerns through statutory and non-statutory consultation responses about the lack of evidence underpinning the consultation materials, and that some consultation materials appear to be misleading to the public. The details of these concerns can be found in the attached letters dated 13 th March 2025, 1 st May 2025, 28 th July 2025.

SEGRO Properties Limited
c/o [REDACTED]
Delta Planning
EMG2
PO Box 11382
Nottingham
NG2 9AU

Date: 13th March 2025
My Ref: EMG2PC
Your ref:
Contact: [REDACTED]
Phone: [REDACTED]
Email: [REDACTED]@leics.gov.uk

By email to: [REDACTED]@deltaplanning.co.uk

Dear [REDACTED]

**East Midlands Gateway Phase 2 (EMG2)
Response to Statutory Consultation**

Thank you for the email notification that public consultation for the above proposed Nationally Significant Infrastructure Project (NSIP) commenced on 3rd February 2025.

We have considered the information available in the public domain at www.segro.com/slpemg2, including the exhibition boards and draft documents and plans.

General comments

LCC entered into a Planning Performance Agreement with SEGRO in December 2024. Some engagement has taken place with LCC in its capacity as Local Highway Authority (LHA), Lead Local Flood Authority (LLFA), County Planning Authority (CPA) and with statutory responsibilities to improve Public Health. To date there has been no engagement with LCC Legal Services on the drafting of the DCO.

It is disappointing that the exhibition materials presented to the public appear to be misleading, especially with reference to highways and transport matters. Exhibition boards suggest that evidence bases are perhaps more developed than they are or will be at the time of the proposed application submission, and that schemes of mitigation are deliverable. This lack of a fully developed evidence base perhaps explains the significant gaps in several chapters of the draft Environmental Statement.

Chief Executive's Department
Leicestershire County Council, County Hall, Glenfield, Leicestershire LE3 8RA
Telephone: 0116 232 3232 Fax: 0116 305 6260 Minicom: 0116 305 6160

John Sinnott, CBE, MA, Dipl. PA, Chief Executive

www.leicestershire.gov.uk

Local Highway Authority

Public consultation materials include statements regarding proposed highway improvements, and indicative mitigation proposals including for M1 J24. The consultation material suggests that these have been modelled and that proposals would accommodate EMG2 traffic and provide significant relief.

However, neither the detailed proposals nor associated modelling have been shared with LCC. Indeed, it is unclear if this work has been carried out. A traffic and highways programme recently shared with LCC by the Applicant suggests that modelling work will not be reported on in full until October 2025. Noting the proposed application submission in Spring 2025, this would be mid-examination should the Planning Inspectorate accept the application.

To date, there remain significant gaps in the highways and transport modelling evidence base including but not limited to:

- Agreement to Pan Regional Transport Model (PRTM) proformas and model version including lack of consistency with land use quantum assessed in scenarios
- PRTM transport modelling
- Local junction modelling
- VISSIM modelling
- Construction traffic and construction traffic management modelling assessments
- Site access design/s and supporting Road Safety Audits with satisfactory Designer's Response
- Mitigation proposal designs and supporting Road Safety Audits with satisfactory Designer's Response
- Mitigation strategy modelling (PRTM, junction/VISSIM)
- PRTM 2023 sensitivity testing

Furthermore, LCC are yet to see any tangible information from the M1 J24 developer consortium headed by the Applicant to demonstrate that there is a comprehensive solution to the highway constraints in and around M1 J23a-J24 that can accommodate all committed and planned growth, including emerging Local Plan allocations. The consequence of this approach is that if this development were consented with proposals to mitigate its own impact it would be unclear if further capacity improvements could be made, and if not, this would stifle further growth in the area. This perhaps explains why the submitted draft Traffic and Transport Chapter of the Environmental Statement is incomplete and silent in respect of impacts and mitigation, despite exhibition boards suggesting otherwise.

Lead Local Flood Authority

As prescribed within Schedule 1 of The Infrastructure Planning Applications: Prescribed Forms & Procedure Regulations 2009, LCC in its capacity as Lead Local Flood Authority (LLFA) is not a statutory consultee for NSIP in respect of surface water flood risk. This responsibility falls to the Environment Agency. However, as the body responsible for surface

water flood risk in relation to planning, the LLFA is best placed to lead in considering the on-site surface water proposals.

The draft Requirements proposed in relation to surface water drainage are deemed to be minimal in wording. LCC request that these be amended to more prescriptive Requirements as detailed below:

1. No phase shall commence until a surface water drainage scheme for that phase based on sustainable drainage principles and the assessment of the hydrological and hydrogeological context of the development in accordance with the flood risk assessment has been submitted to and approved in writing by the relevant planning authority. The scheme must include:
 - a) the limitation of surface water run-off generated by all rainfall events up to the critical 1 in 100-year return period rainfall event (plus climate change) to the equivalent greenfield Qbar rate;
 - b) detailed design (plans, cross sections and calculations) in support of any surface water drainage scheme, including details of any attenuation system and the outfall arrangements;
 - c) details in relation to the management of surface water on site during construction of the development in order to mitigate flood risk, and for the removal of suspended solids from surface water discharging from the site. Details shall demonstrate how surface water will be managed on site to prevent an increase in flood risk during the various construction stages of development from initial site works through to completion. This shall include temporary attenuation, additional treatment, controls, maintenance and protection; and
 - d) infiltration testing to BRE Digest 365 (or equivalent) or suitable evidence that infiltration methods of disposal on-site is not technically viable. Where infiltration results indicate that infiltration is a viable method of surface water disposal, the surface water strategy should be amended to incorporate infiltration disposal methods.

Reason: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site.

2. No phase shall be occupied until details of the long-term maintenance of the surface water drainage system within that phase have been submitted to and approved in writing by the relevant planning authority. The maintenance details must include:
 - a) details of routine maintenance, access, remedial actions and monitoring of the separate elements of the surface water drainage system that will not be adopted by a third party; and
 - b) where relevant, procedures that must be implemented in the event of pollution incidents.

Reason: To establish a suitable maintenance regime that may be monitored over time; that will ensure the long-term performance, both in terms of flood risk and water quality, of the surface water drainage system (including sustainable drainage systems) within the proposed development.

Typically, any works which alter the flow of any existing ordinary watercourse (including ditches) either permanently or during construction, require consent from the LLFA under Section 23 of the Land Drainage Act 1991. It is understood that approval of this development would grant the developer the right to forego this requirement. However, it is requested that this process be observed to demonstrate flood risk mitigation and to ensure the LLFA is fully informed of associated works being undertaken.

It should be noted that LCC is not supportive of the culverting of watercourses (refer to Policy 1: Culverting of Ordinary Watercourses in Appendix 3 of the [Local Flood Risk Management Strategy for Leicestershire](#)). However, we recognise that there are situations where culverting may be necessary. In these cases, open span bridges should be considered in the first instance.

County Planning Authority – Materials and Waste matters

The following information has been identified as inaccurate/inconsistent/missing from the Draft Environmental Statement Chapter 18 – Materials and Waste. It remains unclear what level of engagement is anticipated with the County Planning Authority prior to the DCO application being submitted in May 2025, and if this outstanding work can/will be completed by the Applicant team pre-submission.

Paragraph reference	Comments
18.2.10 ii	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.
18.2.11	<p>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.</p> <p>This Chapter needs to justify expansive study area radius for both materials and waste separately.</p> <p>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.</p>
18.2.13	<p>States that “[<i>This section to be completed on receipt of data from and further consultation with LCC</i>]”.</p> <p>It is not clear what data is expected from LCC. No request has been received.</p>
Table 18.1	In the ‘Assessment of Operational Effects’ section Table 18.1 sets out the

	<p>density:volume ratio for warehouse related waste during operation.</p> <p>An equivalent table should also be provided for construction and demolition related waste in the 'Assessment of Construction Effects' section.</p>
Table 18.2	Sensitivity Criteria table provides criteria for just inert waste but should also provide criteria for other types of waste (e.g. commercial and industrial waste arising during the operational stage).
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.
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.
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.
18.5.17	Again, cut and fill balance needs to be completed.
Table 18.9	<p>Lack of reference to National Planning Policy for Waste (NPPW).</p> <p>Waste Disposal Authority Plan (2018-2030) has been superseded by the adopted Waste and Resources Strategy (2022-2050).</p>
Table 18.11	<p>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.</p> <p>It is using data from 2019 and 2020, when more recent data is available (e.g. Local Aggregate Assessments) and this should be used.</p> <p>Also, it is confusing as to whether a regional picture is being presented, or just Leicestershire.</p>
Table 18.13 and subsequent paragraphs	Inconsistency in the number of incinerators within the 30-mile expansive study area (to be agreed).
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.
18.4.13 and table 18.13	This table should list the waste facilities in the 30-mile expansive study radius, not just Leicestershire.
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.
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.
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.
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).
18.5.20 & 22	Figures provided in these paragraphs do not reflect the figures in the tables that immediately precede them.
Section 18.6, 18.7 & 18.8	All include notes which say: " <i>section to be completed</i> ".

Public Health

LCC welcomes the inclusion of draft Environmental Statement Chapter 17 – Public and Human Health. The Applicant has scoped this Chapter with LCC, and much of the advice provided has been taken on board. However, LCC advised at a meeting in January 2025 that potential impacts on diet and nutrition, and on community safety should be assessed for both the construction and operational phases of development. This approach was agreed by the Applicant team. However, this assessment appears to be missing from section 17.5. It is difficult to make further constructive comments as the Preliminary Environmental Information contains very little detail on the potential effects and proposed mitigation. In addition, there would also appear to be some mislabelling of tables and appendices within the document.

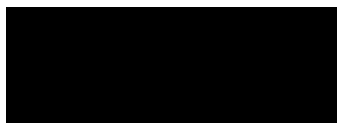
Summary

LCC is concerned that the public consultation materials are misleading by suggesting that evidence bases, assessment, and mitigation strategies on a number of matters are far more advanced than is the case.

Based on work to date, programme information shared with LCC, and significant gaps in the draft Environmental Statement, an application submission to the Planning Inspectorate in Spring 2025 would appear to be premature. It is unlikely that LCC will be able to support the application through examination if submitted with an incomplete evidence base, assessment and mitigation strategy.

LCC would welcome continued and consistent engagement with the Applicant team.

Yours sincerely



Head of the Growth Service

SEGRO Properties Limited
c/o [REDACTED]
Delta Planning
EMG2
PO Box 11382
Nottingham
NG2 9AU

Date: 1 May 2025
My Ref: EMG2PC2
Your ref: EMG2LCCL1
Contact: [REDACTED]
Phone: [REDACTED]
Email: [REDACTED] [leics.gov.uk](mailto:[REDACTED]@leics.gov.uk)

By email to: [REDACTED] [@deltaplanning.co.uk](mailto:[REDACTED]@deltaplanning.co.uk)

Dear [REDACTED]

**East Midlands Gateway Phase 2 (EMG2)
Response to Statutory Consultation Response**

Thank you for your letter dated 14th April 2025 in response to the consultation response of Leicestershire County Council (LCC) on the above dated 13th March 2025.

The below response uses headings consistent with those in previous correspondence and seeks to clarify the position of LCC.

General comments

We have now received copies of the draft Development Consent Orders directly from Gowlings and we welcome this engagement. Given the significant unknowns with the proposals, particularly in respect of highway and transport matters as set out below, it is difficult for us to comment on the detail of the drafts at present, but we will review the high-level principles and have offered meeting availability to Gowlings.

In respect of our concerns with the exhibition boards, this relates to board 6 as copied below:

Chief Executive's Department
Leicestershire County Council, County Hall, Glenfield, Leicestershire LE3 8RA
Telephone: 0116 232 3232 Fax: 0116 305 6260 Minicom: 0116 305 6160

John Sinnott, CBE, MA, Dipl. PA, Chief Executive

www.leicestershire.gov.uk

Traffic and Transport

Building a better transport network

We are addressing the increase in traffic arising from the development while preparing for future needs with significant highway improvements. These upgrades will enhance safety, reduce congestion, and support sustainable transport options.

- Provision of a new free-flow link road from the M1 northbound at Junction 24 to provide a direct link to the A50 westbound, which will bridge the A453
- Lane Widening of the A50 eastbound/ M1 southbound link to Junction 24 from two lanes to three lanes
- Changes to signage and lane marking amendments on the Junction 24 roundabout itself, in particular to provide two lanes from the A453 northbound to the M1 northbound
- Gantry and signage amendments on the M1 northbound
- Lane Widening at the new EMG1 roundabout, to provide two lanes from the A453 southbound into EMG1
- Provision of a dedicated cycle track alongside the A453 between EMG1 and EMG2 Main Site south of the East Midlands Airport
- Provision of minor junction widening at the A453/The Green junction
- Upgrade of footpath L57 to Castle Donington to cycleway

M1 Junction 24 improvements

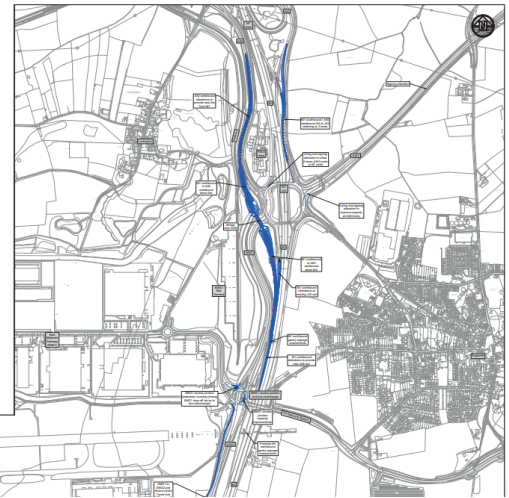
It is widely recognised that Junction 24 is often very heavily congested, particularly at peak times.

The proposals would deliver a significant enhancement to Junction 24, to remove the A50 (Derby/Stoke) traffic from the M1 junction entirely through a new northbound link off the M1 directly to the A50 west bound. Furthermore the A50 eastbound/ M1 southbound link to Junction 24 would be widened to provide an additional lane, with other related works undertaken around Junction 24 and on the M1.

Modelling demonstrates that the above works would significantly relieve the section of the A453 from Junction 23A to the A50, and the Junction 24 roundabout itself, providing capacity on the network to accommodate the increase in traffic arising from the proposed EMG2 traffic.



Highway Works Plans



Of particular concern is the final paragraph which states that modelling demonstrates that the works shown within the drawing would provide significant relief to junctions on the network and accommodate traffic from EMG2. As below, this modelling work remains outstanding, and therefore the board is misleading in this regard.

Local Highway Authority

LCC comment 15.03.2025	Segro current position	LCC response
Agreement to PRTM proformas and model version including lack of consistency with land use quantum assessed in scenarios	The current PRTM proforma (v14) covers the core traffic flow scenarios, inclusive of all committed development and local plan allocations up to an opening year of 2028 and future year of 2038. This was agreed with all authorities, including LCC (HDM), at the TWG meeting on 10 October 2024. Since then PRTM modelling is being undertaken and the outputs received to date from AECOM have been shared with the TWG.	LCC have not signed off the PRTM proforma v14. Modelling work was commissioned at risk by the Applicant at a time when discussions were ongoing around model use (PRTM 2019 or PRTM 2023), trip generation, land use quantum, and site access strategy. Indeed, these discussions remain ongoing.
PRTM transport	PRTM modelling covering the core scenarios agreed within	As above, PRTM proforma v14 is not agreed, and there remains uncertainty in

modelling	<p>Proforma v14 is being undertaken by AECOM. BWB has received Stage1 outputs from the PRTM model which will enable them to assess the impacts of the EMG2 development in more detail.</p> <p>The appropriate mitigation has so far been determined through VISSIM modelling. Whilst we are confident that the proposed mitigation is suitable to accommodate traffic from the development, it is acknowledged that the mitigation still needs testing in PRTM. However, AECOM has been commissioned to complete this second stage of modelling, with outputs expected towards the end of April 2025.</p>	<p>respect of model use and inputs.</p> <p>LCC will continue to work with BWB to agree the contents of the proforma for a PRTM 2023 commission. Following agreement, model runs will need to be commissioned to support. As above, modelling to date has been commissioned at risk.</p>
Local junction modelling	<p>The proposed mitigation package is currently focused on the A453 corridor between M1 J23A and M1 J24 which is included for in VISSIM.</p> <p>Whilst traffic impacts elsewhere on the network are expected to be less significant, particularly with the inclusion of the proposed mitigation, we will review the outputs from the Stage 2 PRTM modelling to understand whether any further junctions need assessing. Where further junctions need assessing, this will be undertaken using Junctions 10 and LinSig software. If further mitigation is required at other junctions, then this will form part of the overall package of mitigation proposed by EMG2</p>	<p>LCC will review local junction models following agreement of the Area of Influence and study area informed by the strategic modelling as described above.</p> <p>LCC advice has been to focus on the strategic impact and mitigation strategy for the development in the first instance, prior to then understanding any impacts on the local road network and developing a package of mitigation if required.</p>

	<p>and set out in the Transport Assessment.</p> <p>We have already agreed base Junctions 10 and LinSig models for a number of individual junctions on the local and Strategic Road Network with National Highways and Nottinghamshire County Council. NH has undertaken a thorough review of all models even though many do not form part of the SRN, confirming they validate well and are acceptable.</p> <p>LCC first received the base models and accompanying Technical Note in January 2024 but stated they would only review the base models following PRTM Stage 2 modelling being complete, which is due to be finalised towards the end of April 2025.</p>	
VISSIM modelling	<p>BWB has completed a significant amount of work to build a microsimulation VISSIM model covering the A453 corridor between the M1 J23A and M1 J24. The base VISSIM model has been approved by National Highways on 14 March 2025 and LCC on 2 April 2025 and is therefore suitable to test the forecast year flows.</p> <p>The Transport Assessment will contain full details of the VISSIM modelling once complete.</p>	Agreed.
Construction traffic and construction traffic management	<p>A Technical Note (EMG2-BWB-GEN-XX-RP-TR-0013) was first issued to the TWG on 24 January 2025 covering construction traffic</p>	<p>LCC provided detailed comments to BWB on this matter on 7th April 2025. BWB have accepted the comments. However, at a subsequent meeting on 1st May 2025 BWB have advised that</p>

modelling assessments	<p>forecasts. Since then, on-going discussions have been held with National Highways seeking to agree the construction traffic numbers before they are tested in PRTM. The latest discussions were held at a meeting on 3 April 2025 (also attended by LCC HDM) following which National Highways has confirmed the numbers are acceptable subject to a commitment to cap the number of construction trips within the Construction Traffic Management Plan.</p> <p>Therefore, once this minor update has been addressed and LCC has provided any final comments, PRTM modelling of the construction traffic can commence.</p>	they are likely to continue with a model commission that fails to address these comments due to programme pressures. This is at the Applicant's risk.
Site access designs and supporting Road safety Audits with satisfactory Designer's response	The site access layout was issued with the consultation materials on 3 February 2025. The design will be reviewed following the Stage 2 modelling, following which we will be undertaking the Stage 1 Road Safety Audit.	We understand from TWG meetings that the access designs are yet to be finalised. We look forward to receiving access design submissions for comment and agreeing the contents of any RSA brief before it is undertaken. To be clear, no access arrangement drawings have been shared directly with LCC for comment to date.
Mitigation proposal designs and supporting Road Safety Audits with satisfactory Designer's	The mitigation proposals were issued with the consultation materials on 3 February 2025. The design will be reviewed following the Stage 2 modelling and following which we will be undertaking the Stage 1 Road Safety Audit.	As above, modelling has not been completed, and mitigation proposals are yet to be tested. We look forward to receiving mitigation design submissions for comment following an agreed modelling process. The contents of any RSA brief must be agreed before it is undertaken. To be clear, no mitigation drawings have been shared directly with LCC to date.
Mitigation strategy modelling (PRTM, junction, VISSIM)	The package of mitigation is currently being modelled in PRTM with outputs due towards the end of April 2025. This will confirm whether the mitigation satisfactorily addresses the	This confirms our comments above in the main body of the letter that public exhibition materials were misleading.

	traffic impacts of the development.	
PRTM 2023 sensitivity testing	BWB has committed to modelling the proposed mitigation in PRTM 2023 as a sensitivity test to the PRTM modelling. However, the review of PRTM 2023 by National Highways has yet to be completed and we await confirmation from National Highways that the 2023 PRTM model is considered suitable for use. That is important given the focus being placed on the impacts of the proposals on the Strategic Road Network. The 2023 PRTM sensitivity test is will therefore take place once the model is approved for use by National Highways. In the meantime BWB will continue testing the mitigation in PRTM 2019 to inform the DCO.	LCC held a workshop with National Highways on PRTM 2023 on 24 th April 2025 and the model has been positively received. This position was confirmed by National Highways at a meeting with BWB on 1 st May 2025. We look forward to this work progressing and reaching agreement on the contents of a proforma.
	The Sustainable Transport Strategy and Framework Travel Plan have been issued and reviewed by the TWG and comments, including those received from yourselves on 3 December 2024, have been addressed by ITP within the latest version issued to the TWG.	LCC will continue to work with ITP to develop this work.
	The statutory consultation materials issued on 3 rd February 2025 included access and rights of way plans which show the proposed changes to private means of access and rights of way. We look forward to receiving any comments on these proposals from LCC.	We would be grateful if BWB would share directly with us the package of drawings that they would like our comments on.
	The statutory consultation materials issued on 3 rd February	As above.

	2025 included traffic regulation order plans which affect the local road network, again any response to those would be welcome.	
--	---	--

Lead Local Flood Authority

We look forward to receiving revised submissions that address the comments in our letter of 13th March 2025.

County Planning Authority – Materials and Waste matters

Since our letter of 13th March 2025, BWB have contacted us and issued a revised draft Materials and Waste Chapter for our review. We provided further comments on 30th April 2025. It is unfortunate that several of our previous comments had not been taken on board, and gaps remain in the assessment. We look forward to receiving a further full response in due course.

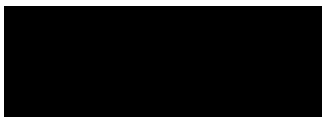
Public Health

We look forward to receiving revised submissions that address the comments in our letter of 13th March 2025 and continued engagement from Savills.

Summary

LCC will continue to engage with SEGRO and their consultancy team throughout the preparation of this application, and we welcome continued dialogue. Given the identified and acknowledged gaps in information, we would be grateful if a revised programme to DCO submission would be shared with us as soon as possible. This will allow for resource planning in line with the Planning Performance Agreement.

Yours sincerely



Head of the Growth Service

SEGRO Properties Limited
c/o [REDACTED]
Delta Planning
Cornwall Buildings
45 Newhall Street
Birmingham
B3 3QR

Date: 28 July 2025
My Ref: EMG2PC3
Your ref: EMG2LCCL
Contact: [REDACTED]
Phone: [REDACTED]
Email: [REDACTED] [@leics.gov.uk](mailto:[REDACTED]@leics.gov.uk)

By email to: [REDACTED] [@deltaplanning.co.uk](mailto:[REDACTED]@deltaplanning.co.uk)

Dear [REDACTED]

**East Midlands Gateway Phase 2 (EMG2)
Response to second round Non-Statutory Consultation**

Thank you for your letter dated 1st July 2025 advising of a further round of non-statutory consultation and in response to the previous consultation submission of Leicestershire County Council (LCC) on the above dated 1st May 2025.

The below seeks to clarify the position of LCC.

General comments

In the s51 advice issued to SEGRO by the Planning Inspectorate on 1st April 2025, the Inspectorate requested clarity on how SEGRO propose to submit the Development Consent Order application for EMG2 and the Material Change Order application relating to EMG1. Following our meeting on 24th July we now understand that SEGRO intend to submit two separate applications, with the Planning Inspectorate yet to determine how the separate applications will be examined.

As discussed, the evidence base supporting both applications must be clear. We understand that chapters of future revisions of the Environmental Statement (ES) will clearly define impacts as follows:

1. EMG1
2. EMG2
3. EMG1 + EMG2
4. EMG1 + EMG2 + impacts of wider planned and emerging growth

Chief Executive's Department
Leicestershire County Council, County Hall, Glenfield, Leicestershire LE3 8RA
Telephone: 0116 232 3232 Fax: 0116 305 6260 Minicom: 0116 305 6160

John Sinnott, CBE, MA, Dipl. PA, Chief Executive

www.leicestershire.gov.uk

This approach is welcomed. On the basis that this approach has not been consistently taken across all chapters of the ES as currently drafted, the document is difficult to follow, and the supporting evidence base remains unclear.

Local Highway Authority (LHA)

Since issuing the LHA's formal response to the statutory consultation in March 2025 further correspondence was received which helpfully set out respective understanding of positions and progress made on transport work. The most recent contact, by way of letter from Delta Planning dated 1st July 2025, principally confirms commencement of non-statutory consultation throughout July 2025. Within this letter it is suggested that "the traffic modelling is now complete." This is not correct with significant workstreams ongoing and remaining without agreement. The letter goes on to helpfully identify the materials that comprise the non-statutory consultation and identifies three "areas of ongoing work" which are hoped to be progressed through July and form part of the subsequent formal submission:

*"i) stage 1 Road Safety Audit,
ii) Stage 2B PRTM forecast modelling report
iii) Peak hour construction traffic modelling findings."*

If this were an accurate reflection of the current status of transport work on the project then the LHA would note absence of some key matters from the non-statutory public consultation. However, unfortunately the LHA would comment that this high-level summary provided within the Delta Planning letter dated 1st July 2025 does not present an accurate record of current transport progress on the project. With regard to the consultation materials shared, the LHA would make the following high-level observations:

- The development proposals differ in quantum and land use from that which has been tested within the supplementary PRTM forecasting reports. In short, the development proposals anticipated to be submitted pursue a greater quantum of land use than the vehicular impact of which has actually been assessed. The applicant's intention has been to retrofit trip rates to support the greater quantum of land use now pursued. The TWG has been consistent in its advice that the desired quantum of land use should be assessed on the basis of the trip rates that were agreed by the TWG. The LHA also note that the requirement to assess all land uses and floor area pursued was a specific requirement detailed in the PINS scoping response to the project.
- Strategic and junction assessment of the EMG1 and EMG2 proposals has only been assessed cumulatively and on the basis of which the highway package of access and mitigation works have been developed. The LHA is aware of ongoing consideration of the determination mechanism of these proposals in light of further advice provided by the Planning Inspectorate and therefore would welcome confirmation of how this aspect will be approached.
- The LHA is concerned with how the access and development proposals have evolved between forecast scenarios. For example, the EMG2 access proposals have been amended and a Toucan crossing of the A453 introduced. Inconsistent application of access infrastructure across scenarios undermines the validity of the outputs and comparisons drawn.

- Agreement to PRTM proformas and model version remains outstanding. In short LCC require assessment of the EMG2 proposals undertaken in PRTM 2023 (post covid model) following an approach agreed in advance. The applicant team have committed to doing this however remains outstanding. Para 12.5 of the TA consultation suggests this is still to be undertaken but it is unclear when.
- Strategic mitigation proposals have been developed by the applicant team in VISSIM. Testing of this mitigation in PRTM is ongoing in an iterative manner as expected and agreed with the TWG. The conclusions therefore are not agreed from a modelling perspective. Following agreement of the principles of mitigation an iterative design process is anticipated.
- Whilst the VISSIM base model has been signed off by the TWG, the forecast models and associated furnishing methodologies has not yet been. The LHA note NH sign off of furnishing approach for the stage 1a only.
- Once agreement is reached on strategic impacts and mitigation strategy any residual impacts on the local road network would need to be investigated and mitigated as appropriate. The LHA cannot agree to any local impact or strategy until that which is developed for the SRN is rightfully prioritised.
- Site access proposals continue to operate over capacity in the with development and with mitigation scenarios. The LHA would welcome the strategic assessment of a dualled A453 to understand if this help accommodate the development access proposals.
- The above does not provide an exhaustive list of workstreams that remain outstanding, Table 1 of the draft TA identifies a number of these items where agreement and sign off is not yet reached by all named parties.

Furthermore, LCC are yet to see any tangible information from the M1 J24 developer consortium headed by the Applicant to demonstrate that there is a comprehensive solution to the highway constraints in and around M1 J23a-J24 that can accommodate all committed and planned growth, including emerging Local Plan allocations. The consequence of this approach is that if this development were consented with proposals to mitigate its own impact it would be unclear if further capacity improvements could be made, and if not, this would stifle further growth in the area.

Lead Local Flood Authority (LLFA)

Our comments dated 13th March 2025 and remain. For clarity, these are repeated below:

As prescribed within the list of Statutory Consultees in Schedule 1 of The Infrastructure Planning Applications: Prescribed Forms & Procedure Regulations 2009, LCC in its capacity as LLFA is not a statutory consultee for Nationally Significant Infrastructure Projects in respect of surface water flood risk. This responsibility falls to the Environment Agency. However, as the body responsible for surface water flood risk in relation to planning, the LLFA is best placed to lead in considering the on-site surface water proposals.

The LLFA was consulted by the applicant at an early stage allow for input into the development of the surface water strategy, as a result the proposals as presented in the Sustainable Drainage Statement (EMG2 Works) and the associated surface water drainage strategy drawing reference EMG2-BWB-WAT-ZZ-DR-CD-0501-S2-P4 (Main Site Concept Drainage Strategy) are in-line with the requirements that the LLFA would typically apply to major developments. Associated EMG1 and off-site highways works do raise cause for concern and details are required to demonstrate that the suggested surface water requirement(s) have been met.

The draft Requirements proposed in relation to surface water drainage are still deemed to be minimal in wording, as outlined in our comments dated 13th March 2025 and re-iterated in our response dated 1st May 2025. We would again request these be amended to more prescriptive Requirements as detailed below:

Advised Surface Water and SuDS Requirements

1. No phase shall commence until a surface water drainage scheme for that phase based on sustainable drainage principles and the assessment of the hydrological and hydrogeological context of the development in accordance with the flood risk assessment has been submitted to and approved in writing by the relevant planning authority. The scheme must include:
 - a) the limitation of surface water run-off generated by all rainfall events up to the critical 1 in 100 year return period rainfall event (plus climate change) to the equivalent greenfield Qbar rate;
 - b) detailed design (plans, cross sections and calculations) in support if any surface water drainage scheme, including details of any attenuation system and the outfall arrangements;
 - c) details in relation to the management of surface water on site during construction of the development in order to mitigate flood risk, and for the removal of suspended solids from surface water discharging from the site. Details shall demonstrate how surface water will be managed on site to prevent an increase in flood risk during the various construction stages of development from initial site works through to completion. This shall include temporary attenuation, additional treatment, controls, maintenance and protection; and
 - d) infiltration testing to BRE Digest 365 (or equivalent) or suitable evidence that infiltration methods of disposal on-site is not technically viable. Where infiltration results indicate that infiltration is a viable method of surface water disposal, the surface water strategy should be amended to incorporate infiltration disposal methods.

Reason: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site.

2. No phase shall be occupied until details of the long-term maintenance of the surface water drainage system within that phase have been submitted to and approved in writing by the relevant planning authority. The maintenance details must include:
 - a) details of routine maintenance, access, remedial actions and monitoring of the separate elements of the surface water drainage system that will not be adopted by a third party; and
 - b) where relevant, procedures that must be implemented in the event of pollution incidents.

Reason: To establish a suitable maintenance regime that may be monitored over time; that will ensure the long-term performance, both in terms of flood risk and water quality, of the surface water drainage system (including sustainable drainage systems) within the proposed development.

It should be noted that LCC is not supportive of the culverting of watercourses (refer to Policy 1: Culverting of Ordinary Watercourses in Appendix 3 of the [Local Flood Risk Management Strategy for Leicestershire](#)). However, we recognise that there are situations where culverting may be necessary. In these cases, open span bridges should be considered in the first instance.

County Planning Authority – Materials and Waste matters

Based on our previous comments the following information has been identified as remaining inaccurate/inconsistent/missing from the Draft Environmental Statement Chapter 18 – Materials and Waste:

Comments 13th March 2025	Latest Comments 24th July 2025
<p>Paragraph 18.2.10 ii</p> <p>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.</p> <p>Paragraph 18.2.11</p> <p>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.</p> <p>This Chapter needs to justify expansive study area radius for both materials and waste separately.</p> <p>Radius still needs to be agreed with LCC and with other neighbouring authorities (Nottinghamshire, Derbyshire, Staffordshire, Lincolnshire, Staffordshire, Warwickshire and West Midlands Combined Authority).</p> <p>Whatever radius is agreed, it must be</p>	<p>LCC welcome the further information provided which justifies the expansive study area for both materials and waste.</p> <p>We acknowledge Appendix 18A: Technical Note Justifying the Expanded Study Area in Consultation with LCC (Document DCO 6.18A/MCO 6.18A) and Appendix 18C: Expanded Study Area Plan (Document DCO 6.18A/MCO 6.18A).</p> <p>Appendix A deals specifically with the ZOI (expansive study area) for waste. We agree that waste has been covered separately.</p> <p>Appendix B covers the ZOI (expansive study area for waste and materials). This seems to be almost entirely the same evidence as Appendix A and seems to be considering materials with waste.</p> <p>It is unclear whether the radius has been agreed with other authorities although there is mention of further discussion with them.</p>

clear whether it is based on vehicle miles distance travelled or an isochrone.	
<p>Paragraph 18.2.13 states that “[This section to be completed on receipt of data from and further consultation with LCC]”.</p> <p>It is not clear what data is expected from LCC. No request has been received.</p>	<p>Since our original comments, LCC have received a request for site-level waste data and have provided available data to BWB on behalf of the Applicant. We note that BWB commented <i>‘This will now be requested formally from LCC and relevant waste planning authorities’</i>. We note that LCC capacities were requested and incorporated into the chapter.</p>
<p>Table 18.1</p> <p>In the ‘Assessment of Operational Effects’ section Table 18.1 sets out the density:volume ratio for warehouse related waste during operation.</p> <p>An equivalent table should also be provided for construction and demolition related waste in the ‘Assessment of Construction Effects’</p>	<p><i>Table 18.4: Typical Estimates for the Density of Construction Waste</i> sets out density (kg/l) for waste produced during construction. Paragraph 18.5.20 addresses construction waste and this is also covered in tables 18.29, 18.30 and 18.31.</p>
<p>Table 18.2</p> <p>Sensitivity Criteria table provides criteria for just inert waste but should also provide criteria for other types of waste (e.g. commercial and industrial waste arising during the operational stage).</p>	<p>We note that Table 18.6 has been updated to include non-hazardous waste void capacity as well as inert and welcome this.</p>
<p>Paragraphs 18.2.44 & 45</p> <p>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.</p>	<p>We welcome the further engagement which has taken place with LCC since our original comments. We note the contact log included which is also helpful. We note the response which states that further focused consultation with LCC has taken place <i>‘to clarify outstanding data gaps and seek agreement on key methodological assumptions (including waste stream baselines, receptor sensitivities, and projected capacities)’</i>. Whilst it may have been one of the discussion points, it is perhaps less true to say that much projected capacity information has been able to be given, as projected capacity is often driven by the market and unless planned for in the Local Plan, any additions could be commercially confidential whilst still in the planning process.</p>

Paragraph 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.

It is noted that the most current information (2023) from the Waste Data Interrogator has since been applied, and the narrative has been updated accordingly. This includes in the '**Limitations and Assumptions**' in paragraph 18.2.50 but is also further mentioned throughout including at paragraph 18.4.12 of '**General Waste Management Practices**' and 18.4.16 and Table 18.17 on waste management routes with subsequent commentary in paragraph 18.4.17. Landfill capacity from 18.4.20 onwards is also updated to 2023, as is recycling facility data for C&D waste in paragraph 18.4.26 and Table 18.21 and the **Energy from Waste** section and **Hazardous Waste** section.

Table 18.21 shows different data to the latest AMR however which shows a total of 792,655 tonnes of C&D waste received in 2023. It's not clear what the data is made up of, and more clarity is needed (e.g. removing landfills gives 406,147 tonnes).

Further, we welcome the acknowledgement that there is a dearth of data, as previously discussed.

On a related note, we would suggest that paragraph 18.4.39 be amended. It appears that this is taken from Table 20 of the latest Leicestershire County Council Authority Monitoring Report (AMR). These sites are not recently permitted. It would be more suitable to state that there was further capacity permitted in the 2022-23 AMR period (in table 5 of 2022-2023 AMR), which amounted to 70,800 tonnes per annum of inert recycling capacity and non-hazardous transfer and bulking capacity respectively. Whilst other developments were permitted in the period, these did not lead to further capacity. Husbands Bosworth Quarry (2021/CM/0041/LCC), whilst primarily a minerals development, also created significant inert landfill capacity of some 1.3 million tonnes for imported inert, construction, demolition and excavation (CD&E) waste during the 2022-23 monitoring period.

Paragraph 18.4.32 states '*The calculation within Table 18.23 shows the void capacity for Hazardous waste sites for 2020 and forecasted*

	<p>for 2025 both at a Regional (i.e. East Midlands) and National level. In all cases the sensitivity is very high'. Should this also be 2023 rather than 2020?</p>
<p>Table 18.8 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.</p> <p>Paragraph 18.5.17</p> <p>Again, cut and fill balance needs to be completed.</p>	<p>We note that this has now been provided in new Table 18.11 and full details contained in Chapter 14: Ground Conditions and the accompanying appendices.</p> <p>Paragraph 18.5.4 seems to contradict later where it says balance will not be achieved. This seems to be in relation to EMG2 Works however so may just need clarification that this is the case. It says at 18.5.36 that '<i>An earthworks cut and fill assessment for EMG1 Works has been undertaken (Document MCO 6.14M). This assessment determined that there will be an approximate deficit of 37,382m3, which is not considered to provide a balanced cut and fill exercise. However, there is flexibility to reduce this deficit</i>'. </p> <p>Appendix 18D: Site Waste and Materials Management Plan (SWMMP) (Document DCO 6.18D/MCO 6.18D) – There is no Development Sequencing Plan as paragraph 3.8 says '(Document XX)'. Also, paragraph 3.52 is titled Hazardous Waste but goes on to talk about C&D waste. Is the title correct, therefore?</p>
<p>Table 18.9</p> <p>Lack of reference to National Planning Policy for Waste (NPPW).</p> <p>Waste Disposal Authority Plan (2018-2030) has been superseded by the adopted Waste and Resources Strategy (2022-2050).</p>	<p>We note that this has now been corrected in new Table 18.12 and NPPW referenced, together with replacing the outdated Waste Disposal Authority Plan.</p> <p>There is reference in the table to the 'UK's Resources and Waste Strategy (2022-2050)' – this seems to be a conflation of the Leicestershire County Council Resources and Waste Strategy and the national strategy. These dates do not seem right. There is the Resources and waste strategy for England, published in 2018. There is the 'The waste prevention programme for England: Maximising Resources, Minimising Waste' published 2023. There is also the 2024 'Resources and Waste Strategy: Monitoring Progress' document.</p>
Table 18.11	<p>We welcome that new Table 18.14 is now less confused. It should be noted however that this</p>

<p>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.</p> <p>It is using data from 2019 and 2020, when more recent data is available (e.g. Local Aggregate Assessments) and this should be used.</p> <p>Also, it is confusing as to whether a regional picture is being presented, or just Leicestershire.</p>	<p>table shows sales for S&G and whilst it still says 'Permitted Crushed Rock' for Crushed Rock this data actually consists of sales as well (as referenced in the latest Local Aggregate Assessment data). We note the footnote and suggest that the word 'Permitted' is removed.</p>
<p>Table 18.13 and subsequent paragraphs</p> <p>Inconsistency in the number of incinerators within the 30-mile expansive study area (to be agreed).</p>	<p>We welcome the new Table 18.15 and accompanying text which clarifies both the study area and the number of facilities. There does however still seem to be inconsistency, as Table 18.15 states 9 facilities are 'incineration' and paragraphs 18.4.27 to 18.4.29 state that there are Newhurst, Widmerpool and Drakelow.</p>
<p>Paragraph 18.4.8 to 18.4.11</p> <p>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.</p>	<p>We note that '<i>The non-hazardous municipal waste and C&D waste have been separated, and recycling rate comparisons have been revised to reflect like-for-like waste types, using appropriate DEFRA data sets</i>'. It is true to say that the commentary on waste streams including at paragraphs 18.4.13 to 18.4.19 on Construction Waste and subsequent sections such as Landfill Capacity and Recycling Facilities is now clearer in its reference to different waste streams. Associated tables are also clear on streams. The exception to this is Table 18.17 which although clarified in the text at paragraph 18.4.16 that it refers to C&D waste, still refers to Inert and Non- Hazardous Waste (Tonnes) in the column title.</p>
<p>Paragraph 18.4.13 and table 18.13</p> <p>This table should list the waste facilities in the 30-mile expansive study radius, not just Leicestershire.</p>	<p>We welcome new Table 18.17, which is now simply a capacity by the three counties in the study area by waste management route and waste type, rather than by individual sites and their location. This seems sensible. It is still unclear why inert and non-hazardous waste have been grouped together, however.</p>

<p>Paragraph 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.</p> <p>Paragraph 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.</p>	<p>We note this has been updated. We note new Table 18.15 sets out the number of Waste Management Facilities within the Study Area and the following tables 18.16 and 18.17 which provide recycling percentages.</p> <p>We note the response '<i>The comparison with national performance is provided given the EMG2 Project 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 potential mixed comparisons have been removed.</i>' It is still unclear however as to why the table shows both Inert and Non- Hazardous Waste as one column as they are two very different streams.</p>
<p>Table 18.15</p> <p>Only landfill capacity in Leicestershire has been considered. It is missing for other authorities within whatever expansive study area is identified and agreed.</p>	<p>We note new Table 18.19 has been expanded to include landfill capacity for all authorities within the defined study area (LCC, Notts and Derbyshire). Sources have been cited from relevant regional and local waste plans. We would however question the figures for non-hazardous landfill remaining in Leicestershire. The LCC area has one non-hazardous landfill (Shawell) which is indicated (under the name Cotesbach) as having 10,603,925 cubic metres remaining at the end of 2023 in the latest AMR (EA figures).</p>
<p>Table 18.17</p> <p>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).</p> <p>Furthermore, no facilities have been considered in the expansive study area outside of Leicestershire (e.g. Derbyshire, Nottinghamshire).</p>	<p>We note new Table 18.21 which is now purely waste received in 2023 at C&D Recycling Facilities. This seems reasonable, although there is now no indication of which facilities are included.</p> <p>We note the comment that '<i>Since publication of the draft chapter, 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.</i>'</p> <p>Table 18.24 needs checking against the latest AMR. This appears to be a reproduction of the capacity in the 2023 LCC AMR. Some of these sites within the AMR would not take waste from EMG2 (e.g. Kings Hill Cremations)! Therefore the figure of 182.5 tonnes for 'disposal (not</p>

	<p>landfill) column would not be relevant.</p> <p>On a related note, paragraph 18.2.8 seems to contradict the earlier affirmation that Derbyshire CC is now included as it says: '<i>To date, no response has been received</i>'.</p>
<p>Paragraphs 18.5.20 & 22</p> <p>Figures provided in these paragraphs do not reflect the figures in the tables that immediately precede them.</p>	<p>We note the response that '<i>Since publication of the draft chapter, figures in the text have been updated to align precisely with those in the tables. Any discrepancies due to rounding or outdated figures have been resolved</i>'. This seems to have been resolved.</p>
<p>Section 18.6, 18.7 & 18.8</p> <p>All include notes which say: "section to be completed".</p>	<p>This appears to have been resolved. All have been updated and no longer include 'section to be completed'.</p>
	<p>This is a new comment.</p> <p>We welcome the Updated Technical Note in Consultation with LCC (Appendix 18B). This provides added clarity on matters of agreement and of methodology, especially in relation to data limitations and zone of influence.</p>
	<p>This is a new comment.</p> <p>Table 18.19 shows different data to the latest Leicestershire County Council Authority Monitoring Report (AMR). It is unclear where this data is from. The latest AMR shows (sourced from EA WDI) that in Leicestershire 11,986,390 cubic metres of capacity were remaining at the end of 2023. The latest AMR shows 10,624,145 cubic metres of non-hazardous landfill capacity remaining.</p>

Public Health

LCC agrees to the reporting preference requested by Savills on behalf of the Applicant which includes the removal of the separate Health Impact Assessment (HIA) appendix. This approach is accepted on the premise that all information that would have been included in a separate HIA appendix is fully integrated into the Population and Human Health chapter of the ES. Savills have confirmed that no analysis will be lost or omitted.

LCC has raised concerns that the health and equalities impact assessment is based on transport modelling that is not currently complete or agreed. Therefore, conclusions reached

in the Population and Human Health chapter of the ES will need to be rechecked once the modelled data is complete and agreed. Otherwise, conclusions reached on likely health and equality outcomes related to numerous matters may be inaccurate.

This review will need to be carried out for the construction and operational phases of the development, and for the cumulative assessment, as well as the equality assessments. All the aspects currently included in the ES chapter and HIA will require review as listed below:

- Health effects from changes in air quality
- Health effects from changes in transport, access and connections
- Health effects from changes in noise and vibration
- Health effects from changes in diet and nutrition
- Community safety
- Health effects from access to open space and PROW for physical activity, leisure/play and recreation
- Health effects from changes in socio-economic factors (employment and income)
- Visual environment

Health effects from changes in air quality

Following completion and agreement to transport modelling work, we will seek updated assessments and clarity regarding how the proposal, and its cumulative impacts, will affect air quality in the area. Consideration should be given to the cumulative impacts on the health and wellbeing of local residents during both construction and operational phases, noting the location of the site bounded by the M1, A453, and within proximity of East Midlands Airport and Donington Park Racetrack.

Updated impacts on the designated Air Quality Management Area (AQMA) should also be provided:

AQMA	Description	Date Declared	Date Amended	Date Revoked	Pollutants
<u>Castle Donington AQMA</u>	An area encompassing the High Street and Bondgate area of Castle Donington. The northern extent of the AQMA has been amended to include the junction of Bondgate with The Spittal and the southern extent shall extend to the Moira Arms.	09/01/2008	22/01/2013		Nitrogen dioxide NO ₂

For more information, please see https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=184

Any increases in air pollution can negatively impact on health outcomes across the life course. Exposure to low levels of air pollution can still be harmful and contribute to and exacerbate a range of health issues, including respiratory and cardiovascular diseases, and reduce life expectancy.

LCC highlight the need for further consideration of population groups that are most vulnerable to the health impacts of poor air quality, as identified in the Chief Medical Officer's Annual Report on Air Quality 2022, in addition to the groups addressed under the Equality Act.

LCC welcome the upcoming quantitative health assessment that will be conducted to determine the potential human health effects at the population level as outlined in section 1.4.22. of the HIA.

Health effects from changes in noise and vibration

Following completion and agreement to transport modelling work we would seek further updated considerations on how the proposal and cumulative impacts will impact on noise and vibration in the area.

Consideration should be given to the cumulative impacts on the health and wellbeing of local residents during both construction and operational phases noting the location of the site bounded by the M1, A453, and within proximity of East Midlands Airport and Donington Park Racetrack.

Environmental noise is associated with increased stress and sleep disturbance, which over the long term can lead to a number of adverse health consequences.

Health effects from changes in transport, access and connections

Following completion and agreement to transport modelling work, we would seek further updated considerations on how the proposal and cumulative impacts will impact on access to and for local communities and services.

Health effects from changes in diet and nutrition

Following completion and agreement to transport modelling work we would seek further updated considerations on how the proposal and cumulative impacts will impact on diet and nutrition.

Community safety

Following completion and agreement to transport modelling work we would seek further updated considerations on how the proposal and cumulative impacts are likely to interact with community safety in the area.

Health effects from access to open space and PROW for physical activity, leisure/play and recreation

Following completion and agreement to transport modelling work we would seek further updated considerations and possible mitigation measures on how the proposal and

cumulative impacts will impact on access in the area. This would include, but not be limited to temporary and permanent closures, diversions or obstructions to Public Rights of Way, footpaths, resting areas, cycle routes and recreation, green and blue spaces.

Ecology

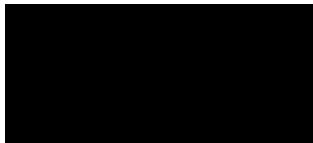
LCC comments have been provided directly to FPCR. We await the BNG report/s for comment.

Summary

LCC will continue to engage with SEGRO and their consultancy team throughout the preparation of this application, and we welcome continued dialogue. We would be grateful if any revised programme to DCO submission could be shared with us following your review of consultation responses, and any updates on the proposed method of examination are shared.

LCC comments on the dDCO will follow separately.

Yours sincerely



Head of the Growth Service