

## Protect Diseworth response to planning inspectorate queries on EMG2 DCO

Q3.0.2 BMV agricultural land permanent loss and temporary effects

Q3.0.3 BMV significance thresholds

The SEGRO EMG2 application is primarily a development on agricultural land, made up of the following grades (Environmental Statement Chapter 15 Agriculture and Soils)

**Table 15.5: Areas occupied by the different land grades**

Grade/Subgrade	Area (ha)	% of the land
Grade 1	2.0	2
Grade 2	6.4	6
Subgrade 3a	26.8	27
Subgrade 3b	64.2	64
Non agricultural	0.9	1
Total	100.3	100

The grade 1, grade 2 and subgrade 3 parts (considered to be best and most versatile land, i.e. land regarded as high sensitivity) make up 35.2ha (35.1%) of the total area. This land will be removed from agricultural use permanently should this scheme proceed.

Natural England comments in Table 15.4 Further consultation commentary.

*“There remain multiple instances in the chapter where proposed methodology doesn’t follow the guidance.....including the scale of magnitude thresholds and the downgrading of the grade 3a land sensitivity”*

Applicant claims in 15.2.18 *“sufficient topsoil should be protected to complete all on-site landscaping/greenspace requirements”* however this fails to acknowledge that the agricultural land the topsoil is removed from is permanently removed from agricultural use.

Table 15.5 Magnitude of Impacts acknowledges that Irreversible loss of >20ha of agricultural land is deemed “High” and Table 15.6 Significance Matrix that 35.2ha (35.1%) of the site is therefore considered to be of Major significance.

## 15.5 Assessment of DCO application

Soil resources 15.5.9 acknowledges “*that significant loss of topsoil resources and compaction of 40% of subsoil is major magnitude and an adverse impact of EMG2 works*”, and 15.5.19 reaffirms this where “*permanent loss of bmv land remains a significant major adverse effect.*” This is further reinforced in 15.5.14 and 15.5.19 where it acknowledges that “*there will be a medium magnitude loss of 8.4ha of very high sensitivity grades 1 and 2 land and high magnitude loss of 26.8ha of high sensitivity subgrade 3a land*”

Table 15.9 regional cumulative losses, and table 15.10 national cumulative losses appear flawed, and an attempt to downplay the cumulative impact.

The regional loss of 37% of BMV land in NWL from this proposal in isolation is extremely high. This does not consider the other potential development proposed for NWL and is therefore **not cumulative**.

In the same way, the suggestion is made that nationally this one development is 0.32% of bmv loss nationally, however this contributes along with multiple other schemes to create the cumulative impact.

Whichever way this is presented, it reinforces Protect Diseworth statistics that the East Midlands region is taking more development than the national average, and NWL is taking a greater proportion of development than Leicestershire as a whole.

### **Conclusion**

- Warehousing is a low land-use efficiency, land-hungry use that should be directed to least sensitive land, not productive farmland.
- Warehousing is not land-dependent, and this application is trying to bypass brownfield alternatives, and there is no need to be using this site as loss of BMV land is irreversible.
- The local area is already under pressure from housing development, energy infrastructure and transport schemes, allocating agricultural land to warehousing is misuse of scarce resources
- If development is needed, this application represents one of the worst possible locations according to national land prioritisation.
- UK Governments Land Use Framework clearly states, “*strategic safeguarding of the best farmland from permanent land use change*” and “*Right Use, right place*” This application is in direct contradiction to these aims

