

## SEGRO DCO EXAMINATION – DEADLINE 4 SUBMISSION from Ray Sutton

My input at ISH3, Agenda 4 (Traffic and Transport), raises key overarching issues, not yet addressed, and is reproduced here as a marker for the ultimate outcome of the Examination. The section headers are new:

“Sir I want to pick up what Chris Cain of Strategic Aviation Special Interest Group was going to say yesterday on Traffic and Transport had I not crowded out his time and without wasting time in the light of this morning’s substantial progress in identifying important questions.

### Strategic and operational impact of a incremental and piecemeal proposal

What we seek is a comprehensive Transport Impact Assessment, agreed by all relevant parties and suitable for submission to the Secretary of State, that demonstrates that, either, the local and wider network impacts can be accommodated on the existing road and public transport networks, or, identifies exactly what improvements are needed, what form those would take, and at what cost. Certification of the outcome from National Highways and the County Highway authorities is required, no ifs, no buts.

Our reading of the situation is that the scale of works required to ensure acceptable levels of service and avoid oversaturation, especially the improvements to the wider highway and trunk road network, is substantial and likely to run into many hundreds of millions, if an acceptable solution can be found at all. The point has been well made we do not have a clear, comprehensive and definitive set of proposals and costings to consider.

### Artificial limitation of strategic boundaries

To take one practical point, we have not heard from Nottinghamshire County Highways or the East Midlands Mayor or Derbyshire County Highways, all of whom have a strong strategic interest in the A453, the A50 and the M1....and, for that matter, in the last item at 4.6 sustainable transport.

### Security of Finance

The cost element is important. If the applicant is to pick up the costs of its proposals, then it is important that a financial appraisal is submitted demonstrating that the EMG2 DCO development can absorb these costs and remain commercially viable. If it needs public sector intervention, then that alone must raise serious doubts about

whether a Development Consent Order should be granted for the site. If however, an underpinning assumption is that a public contribution will be made to the cost of the relevant work, two further consequential questions are raised. First is the funding available within national and local road and infrastructure budgets? Second, where is the Transport Economic Assessment that demonstrates that any such spending offers optimum value for money in the view of National Highways, the County Council and the East Midlands Mayor?

Surely these matters should have been dealt with at the application stage and available for detailed scrutiny during this examination? We would argue their absence is sufficient reason to dismiss the DCO application or invite the promoters to resubmit when they are fully able to address all highways and public transport matters.