

**Deadline 4 Submission by National Highways Limited**

**NH Response to Written Questions (ExQ2)**

**Application by Segro Properties Ltd for an Order granting Development Consent for the Extension of Freeport, the second phase of East Midlands Gateway and East Midlands Gateway Rail Freight Interchange Material Change Order**

**Planning Inspectorate Reference Number: BC0410001 /TR0510002**

## 1. INTRODUCTION

- 1.1 This document is submitted by National Highways ("NH") for Deadline 4 in respect of application by **Segro Properties Ltd ("Applicant")** for an order granting development consent for **the East Midlands Gateway 2** project ("DCO") and **East Midlands Gateway Rail Freight Interchange ("MCO")**. The Applicant seeks development consent for proposed authorised developments described in Schedule 1 of the draft DCO ("**Authorised Development**").
- 1.2 This document sets out a written response to the Examining Panel's written questions and requests for information (ExQ2) issued on 2<sup>nd</sup> June 2026.

## 2. RESPONSE TO WRITTEN QUESTIONS ARISING FROM ISSUE SPECIFIC HEARING 3

Question Number	Question to:	Question:	NH Response
Q2.0.1	The applicants NWLDC  NH	<b>Design review</b>  In its response to ExQ1 2.0.5 [REP1-054] the applicants have resisted the inclusion of Design Review within the detail of the design, considering that the Design Code provides sufficient protections. The response only refers to buildings and does not address the question of highway structures, which were referenced in the question. The applicants are asked to respond to the original question in respect of highway structures. NWLDC and NH are asked for their views as to whether Design Review should be a mandatory requirement within the design process.	<p>The SRN works have been designed in accordance with the Design Manual for Roads and Bridges (DMRB), which mandates in standard GG 103 that "The principles of good road design shall inform the design of motorway and all-purpose trunk roads." Further, NH has confirmed it is satisfied that the design is compliant with the DMRB.</p> <p>The detailed design will also need to be compliant with the DMRB as set out in NH's Protective Provisions. In relation to the design of the bridge specifically, DMRB standard CD 351 "The design and appearance of highway structures" ensures that good design is considered within the detailed bridge design.</p> <p>NH's assurance process at the detailed design stage includes a comprehensive review of the design and will be mindful of NH's Good Design Guide. In this, "National Highways emphasises that <b>good road design should be safe, inclusive, environmentally sustainable, and context-sensitive</b>, while also enhancing the user experience and local communities."</p> <p>Therefore, NH is satisfied that a further Design Review is not required.</p>

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Q8.4.1	The applicants All those who would benefit from protective provisions Protective provisions	<p><b>Protective provisions</b></p> <p>Would the applicants please ensure that the next version of the dDCO to be submitted at D4 includes updated protective provisions as far as will have been agreed. Where disagreements remain could those who would benefit from protective provisions ensure that they submit alternative versions explaining why, by each specific provision, they hold that different drafting should be provided.</p>	<p>The key points currently in dispute between NH and the Applicant as are follows:</p> <ul style="list-style-type: none"> <li>– Commuted sum: NH policy requires a commuted sum where it takes over responsibility for new highway assets. The Applicant is negotiating the principle of a commuted sum and the parties are engaged in discussion on this matter.</li> <li>– Bond sum: NH requires a sum of 200% the value of the specified works. This is in line with the figure agreed on several other schemes. The Applicant is seeking a 120% bond sum.</li> <li>– Insurance: NH requires public liability insurance of £50 million for works, whereas the Applicant is seeking a £10 million sum.</li> </ul> <p>These remaining issues relate to financial matters. NH considers its position reasonable, given the significant highways NSIP within the scheme. If the Applicant’s terms were to prevail, the costs would be passed on to NH and ultimately, the taxpayer, which would be an unreasonable burden arising as a result of a third party scheme.</p> <p>NH’s preferred form of protective provisions is as enclosed in its relevant representation [RR-022]. If an agreement is not reached with the Applicant, NH will submit its preferred protective provisions at the penultimate deadline.</p>
Q19.0.2	LCC NH	<p><b>Traffic modelling</b></p> <p>Can both NH and LCC comment on the critique of the TA as provided by EMIA in [REP3-058]? If there are proposals for any of the specific junctions commented upon then could these be identified along with information as to whether they have been secured.</p>	<p>NH’s overall view is that the matters raised by EMIA in REP3-058 do not alter NH’s position, as these issues have already been considered as part of our assessment. NH remains satisfied that the traffic impacts of the development have been appropriately established and mitigated. In particular, there are two key topics which we would like to expand upon:</p> <ul style="list-style-type: none"> <li>• The use and interpretation of PRTM 2019 and PRTM 2023 models</li> <li>• Impact assessment and mitigation</li> </ul>

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			<p><b><u>The use of PRTM 23 and PRTM 19</u></b></p> <p>REP3-058 raises concerns regarding differences between PRTM 2019 and PRTM 2023 outputs and queries the reliance on earlier modelling. Paragraph 3.6 of the note also seeks confirmation as to why the PRTM 2023 model is not being used, given that it has been validated by Leicestershire County Council (LCC) and NH.</p> <p>NH confirms:</p> <ul style="list-style-type: none"> <li>• The Applicant has undertaken assessments using both PRTM 2019 and PRTM 2023 demand inputs</li> <li>• Both PRTM 2019 and 2023 models have been validated by NH and accepted for use in assessing impacts on the SRN</li> <li>• The PRTM 2019 and 2023-based VISSIM modelling has been independently audited by NH and found to be acceptable, with model outputs considered reliable</li> </ul> <p>It is expected that two models will lead to some variation, particularly in a highly sensitive location such as M1 Junction 24. Consideration of these differences has been undertaken by NH as part of our appraisal of the submitted traffic models and both models lead to the same overarching conclusions:</p> <ul style="list-style-type: none"> <li>• There is significant congestion at M1 Junction 24, which would act as a constraint</li> <li>• The overall need for mitigation and its effectiveness is consistent. Both models confirm that the proposed mitigation resolves this key safety issue, containing queues within the slip road. This is</li> </ul>

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			<p>particularly evident in the mainline queue on the M1 northbound off-slip</p> <ul style="list-style-type: none"> <li>• There is also consistent evidence of queueing at key approaches and movements at other locations including the EMG1 Gyratory, Finger Farm roundabout and the A453</li> <li>• The journey time results indicate consistent improvements in network conditions across most routes, particularly those originating from the southern part of the modelled network using the northbound off-slips at M1 J23a and M1 J24, or those benefiting from the reduced A42/M1 to A453 movement at Finger Farm Roundabout</li> </ul> <p>This provides NH increased confidence in the robustness of the mitigation, as it performs satisfactorily under both model assessments.</p> <p><b><u>Impact assessment and mitigation</u></b></p> <p>Paragraph 2.3 of the note explains that the assessment identifies where junctions are expected to exceed capacity due to development traffic and indicates where mitigation measures have been proposed.</p> <p>NH's modelling assessment considers the implications on both links and junctions of the SRN, rather than whether a junction exceeds its theoretical capacity. The key consideration for NH is the scale and consequence of the impact, specifically how it affects operation and safety and how this informs the need, timing, and scale of mitigation measures.</p> <p>REP3-058 raises concerns regarding increased queueing on the southbound off-slip/ A50 approach to M1J24. NH acknowledges that some redistribution of delay occurs as a result of the proposed mitigation. This</p>

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			<p>redistribution is largely driven by cumulative background growth. This is less pronounced in the PRTM 23 assessment than PRTM 19.</p> <p>The logic behind the increased queuing on the A50/M1 approach as a result of the mitigation, observed in Scenario A but not in Scenario B is questioned. While the proposed mitigation strategy significantly reduces queuing on the M1 northbound by allowing more traffic to enter the circulatory section of Junction 24, it may inadvertently create new operational challenges. NH's assessment indicates that the increased queue on the southbound off-slip is likely caused by higher opposing flows and signal rebalancing (with MOVA prioritising circulatory flow). This aligns with the redistribution of traffic away from the A453 and Finger Farm, which encourages more vehicles to remain on the M1 and use J24.</p> <p>There is therefore potential for increased opposing traffic movements on the M1 southbound/A50 arm at J24, particularly where lanes have been reconfigured to include three ahead lanes on the A453. While the operation is clearly sensitive to variation, the evidence satisfactorily explains the observed impacts and effects.</p> <p>It is acknowledged that there are residual impacts associated with forecast growth. These arise in the context of forecast traffic growth. However, the distribution of development traffic has been appropriately modelled, with trips assigned predominantly towards routes on the SRN. Reasonably our primary consideration is to seek satisfactory resolution to addressing safety and operational performance on the SRN but not to eliminate all delay.</p>
Q19.0.10	NH LCC	<p><b>Highways construction</b></p> <p>In appendix 2 of the Applicants' Response to Hearing Action Points [REP1-053] the applicants' have set out a note on the</p>	<p>The Applicant's estimated duration for the construction of the SRN works is estimated to be approximately 1 year and 9 months.</p>

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		<p>EMG2 construction programme. Could both NH and LCC give their opinions based on their experiences as to whether the construction programme for highways works is realistic. The ExP is not concerned as to whether the start date is accurate, rather the time to undertake the works once commenced, noting in particular the propensity for construction works to extend.</p>	<p>Similar, though slightly more complex, construction projects delivered by NH in recent years, suggest that this is in the range of what would be expected. For example, the A19 Testos Interchange Improvement, which involved a new flyover across a complex roundabout, completed in 2021 and took 2 years and 4 months to construct. The M6 Junction 19 Improvement, which involved the construction of two new structures within the junction gyratory, above the motorway, was built in 2 years and 1 month.</p> <p>The EMG2 works are less complex than these projects and the comparison with the construction of the EMG1 highway works provided by the Applicant is considered reasonable. Further, Segro's experience and successful track record of delivering similar infrastructure on the SRN, and good relationships with the NH team in the Midlands, suggest that an efficient programme is achievable.</p> <p>Whilst a programme of 1 year and 9 months is considered by NH to be the minimum time in which the project can be constructed, the window provided by the Applicant in REP1-05 of Q4 2027 to Q2 2029 is expected to be comfortable and contain sufficient contingency to allow for programme delays.</p>

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Q19.0.11	The applicants NH	<p><b>NH Joint Statement on Strategic Highway Works</b></p> <p>In paragraph 4.2 of the Joint Statement on Strategic Highway Works [REP1-060D] in discussing the proposed highway works as part of the proposed development it is stated: “They also eliminate forecast mainline congestion on the M1 northbound mainline on the approach to Junction 24 (without the planned growth / development) ...”. Could the applicants and NH please explain further precisely what “without the planned growth / development” is referring to? Can, in due course, the final version either be signed on behalf of both parties, or appended within the relevant Statement of Common Ground?</p>	<p>In the 2028 assessment scenarios, the modelling demonstrates that mainline congestion is forecast on the M1 northbound approach to Junction 24. This occurs without the inclusion of the proposed development traffic.</p> <p>The phrase “without the planned growth / development” refers to the scenario without the wider growth in the area as explained in paragraph 2.2 of the joint statement. The terms “planned growth” and “development” are, in effect, synonymous and, on reflection, this is not as clear as it could be. We have therefore amended the Joint Statement on Strategic Highways works to remove any ambiguity. This will be appended to the Statement of Common Ground and submitted by the Applicant at Deadline 4.</p>
Q19.0.12	NH  LCC  NWLDC Prologis/EMIA	<p><b>EMIA Work packages</b></p> <p>Other than the current proposals for the ‘green’ package of works, have the various packages of works shown for the area along the M1 shown on [REP1-054] been identified for other projects. If not, is there any information as to when and how that might occur. The ExP appreciates that this may be difficult to identify, since, for example, for the joint application, at this stage we identified what, if any, highway and transport mitigation works might be necessary.</p>	<p>In recognition of the need for a series of significant interventions at Junction 24 to mitigate the impact of the growth in the area, and to avoid a suboptimal piecemeal approach, a consortium of developers, including the Applicant, has been working on a strategic solution to address the forecast congestion at the junction] to enable further growth to come forwards. The proposal consists of 4 packages of works which NH understands have been assigned to act as mitigation for each member of the Consortium’s developments; EMG2, Isley Woodhouse, the Coaker Lands and Ratcliffe Power Station.</p> <p>Each development will need to demonstrate its impact on the SRN and that appropriate and effective mitigation has been identified. Only in the case of EMG2, has this be achieved so far.</p> <p>Timescales for agreement to, and consent of, the other work packages are currently unknown:</p> <ul style="list-style-type: none"> <li>• A planning application has been submitted for Isley Woodhouse, but further modelling is required before the impact can be understood fully and the required mitigation agreed with NH</li> </ul>

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			<ul style="list-style-type: none"> <li>• NH has not yet seen any modelling for the Coaker Lands development and a planning application has not been submitted</li> <li>• The Ratcliffe Power Station development has a consented LDO but is constrained to previous employment levels until a planning condition for SRN mitigation is discharged. At the present time, no modelling work has been undertaken to determine the impact of the development on the SRN and the mitigation required</li> </ul> <p>National Highways is actively engaged in discussions with the Consortium. which is close to completing a modelling exercise to demonstrate that the proposed packages operate together effectively to accommodate the forecast traffic arising from all planned developments.</p> <p>Other than the proposed EMG2 highway works, there is currently no programme for the delivery of the work packages, nor has the funding and a delivery mechanism been agreed.</p>
Q19.0.18	NH	<p><b>Joint Application Mitigation Package</b></p> <p>Prologis submits [REP3-061] the mitigation package for the joint application focuses on improvements at the Finger Farm roundabout and provision for dualling on the A453, which is consistent with the wider strategic programme (the “purple” package) and represents an alternative, equally valid, contribution. Please can National Highways clarify how the joint application mitigation package compares to the EMG2 mitigation package in terms of facilitating enhancements to the SRN. For example, is any one package more important than any other and which would facilitate more significant enhancements to the SRN?</p>	<p>NH has provided the below response to assist the Examining Authority insofar as is reasonably possible. The Examining Authority will appreciate that NH has a statutory role in commenting on the Prologis scheme outside the DCO process. No decision has been made by NH on the Prologis planning application. Nothing in this response is to be taken to imply what the eventual decision might be, or what final decision NH may reach on any particular issue. NH remains an impartial party and will objectively provide comments on the Prologis planning application outside the DCO process in accordance with its statutory duties.</p> <p>NH continues to work collaboratively with the Applicant team for the Joint Application site to agree the traffic modelling, which will determine the impact of the proposed development on the SRN and identify whether the proposed mitigation adequately accommodates the additional traffic without any residual safety issues. Whilst good progress has been made, the</p>

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			<p>modelling work is not yet complete and some outstanding issues remain. In accordance with its usual process NH will then review the design of the proposed mitigation for compliance with standards. As noted above, NH is participating as a statutory consultee in the planning process for this scheme and has commented on the most recent submission by the Applicant (Prologis/MAG), setting out the further work that is required to resolve the outstanding matters.</p> <p>The most recent Transport Assessment for the Joint Application includes proposed capacity enhancements at Finger Farm Roundabout. As explained above, NH will review the proposed mitigation for the Joint Application site as soon as the traffic modelling is agreed, in accordance with its standard procedure. NH can confirm that the proposed mitigation scheme is compatible with proposals to dual the A453 in the future, in line with the "Purple Package", and likely to be required to accommodate the increased traffic arising from the proposed Isley Woodhouse development, amongst others. Finger Farm Roundabout would also be likely to need enlargement to create additional capacity in such circumstances. NH observes that the proposed mitigation for Isley Woodhouse in its planning application submission includes 4 lanes on the western approach to the roundabout from the A453, compared to the 3 lanes (one of which is segregated) in the Joint Application proposal, as well as other enhancements. Whilst the Joint Application scheme at Finger Farm Roundabout could be adapted to provide additional lane capacity on the western approach, it would likely require removal of the segregated left turn lane and separating infrastructure.</p> <p>In comparison, the EMG2 mitigation is focussed on drawing traffic away from Finger Farm Roundabout and involves minimal work at this location, leaving its enhancement as part of the "Purple Package".</p>

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			<p>NH's statutory role requires us to assess each proposed development on its merits and not to compare them with one another. However, it is clear that the 2 developments differ significantly in both scale and footprint. Therefore, it is to be expected that their impacts and the mitigation required for each development will be substantially different. The DCO scheme encompasses the entirety of the designated EMAGIC area, including the area covered by the Joint Application, and the scale of its mitigation reflects this larger scale of development and consequential traffic impact. Hence, it would be expected that the EMG2 mitigation (should the scheme be implemented) would be a more significant enhancement to the SRN than the mitigation for the Joint Application, which only covers approximately 40% of the site. As noted previously, NH expects that something similar in scale to the "Green Package" would need to be implemented at M1 J24 to accommodate the maximum development on the western side of the junction, including the remainder of the EMAGIC site.</p>

**National Highways Limited**  
**12 June 2026**