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Date: 16th June 2026
My Ref: [REDACTED]
Your ref: BC0410001/TR0510002
Contact: Rebecca Henson
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Dear Sirs

Application by SEGRO Properties Limited for an order granting consent for the East Midlands Gateway Phase 2 (BC0410001) and East Midlands Rail Freight Interchange Material Change (TR0510002)

Deadline 4 submission

Please find attached the following Deadline 4 submission on behalf of Leicestershire County Council (LCC):

- LCC responses to Examining Panel second questions, CAH2 actions, ISH3 actions

We hope that this information is helpful to the Examining Panel.

Yours faithfully

[REDACTED]
Rebecca Henson
Head of the Growth Service

East Midlands Gateway Phase 2 – East Midlands Gateway Rail Freight Interchange Material Change - LCC responses to Examining Panel (ExP) second questions – Deadline 4 – 16th June 2026

ExP reference	Question	Response
Q8.01	<p>Draft DCO (general)</p> <p>In its 'Post hearing submissions for ISH2, including written summaries of oral cases' [REP1-087] LCC set out various amendments to the dDCO which it wished to see.</p> <p>Could LCC please go through the version of the dDCO submitted at D2 [REP2-008D] and respond to the changes made to confirm whether or not the applicants have made the requested changes.</p> <p>The applicants are expected to provide its response to the D2 submission at D4 which should include a provision-by-provision analysis.</p>	<p>LCC has reviewed REP2-009D. Whilst minor drafting changes have been made by the Applicant, many of LCC's concerns are yet to be addressed. The list of outstanding matters is set out in the table below.</p>
Q8.3.3	<p>Requirement 26 – Community liaison group</p> <p>In light of potential changes in local government structure, should this requirement include a provision, similar to that utilised in schedule 15, paragraph 1, that in the event of unitary local government there would be both planning and highway representatives in the group.</p>	<p>LCC would welcome this suggested change.</p>

<p>Q19.0.2</p>	<p>Traffic modelling</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>Technical Note 04 East Midlands Airport – EMG2 DCO Highways and Transport Review produced by SCP on behalf of EMIA is included within the Examination Library at [REP3-059]. The Technical Note provides a technical appraisal of the assessment work undertaken and focuses on both the development impact on the operation of the Local Road Network and with respect to the operation of the airport. With regard to the LRN the note presents concerns over the operation and capacity of LRN junctions such as A453/The Green, Diseworth priority junction in the modelled forecast year. An important point of note when considering these findings is that the cumulative growth assessed as part of the agreed forecast scenarios includes the demand from a number of emerging allocation sites but no associated mitigation strategies since these remain unknown and not yet secured. LCC have therefore adopted a pragmatic approach to considering the residual impact of the development proposals tested as part of the EMG2 assessment scenarios focusing on the impacts and mitigation requirements necessary for this proposal. The interventions proposed seek to draw traffic away from the LRN and onto the Strategic Road Network (SRN), an approach LCC is supportive of given the commercial and logistics development proposed and the displaced traffic impacts that were brought about in the development (without mitigation) scenarios. The approach is also considered consistent with the</p>
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		<p>distribution of development traffic which correctly places a heavy emphasis on the use of the SRN. LCC recognises that the EMG2 development proposals seek to come forward ahead of a wider strategic delivery mechanism and therefore whilst wider mitigation and infrastructure proposals are anticipated to be required locally on the LRN and SRN, these are as yet undeveloped and unsecured and the EMG2 proposals must be considered in isolation. Where opportunities and risks exist of prejudice to future emerging growth, LCC has sought to take a proactive approach to managing this.</p>
<p>Q19.0.10</p>	<p>Highways construction</p> <p>In appendix 2 of the Applicants' Response to Hearing Action Points [REP1-053] the applicants' have set out a note on the 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>LCC defer to National Highways with regard to advising on the probable timescales for construction activities especially those that predominate on the SRN. Notwithstanding this, whilst the exact extent of LRN mitigation remains unknown it is likely not to be of a scale that would impact the timescales and programme that SEGRO have indicated.</p> <p>LCC would however comment that it is not known to what degree the EMG2 construction programme presented has been developed with the wider emerging growth in mind and the probable impacts this might have on managing access to the network, road space booking and managing the impacts of construction activities. In addition, it remains unclear to what extent the Applicant has assessed diversion</p>

		<p>routes for highways works which could be required over an extensive period, and in themselves require interim mitigation.</p> <p>Appendix 3 of [REP1-053] presents a convincing case in support of the development and implementation of a comprehensive package of mitigation and strategic infrastructure but concludes that the EMG2's 'green package' could come forward in advance of that. Any wider strategic, or isolated, improvement package or scheme will of course be subject to the determination timescales and progress of third-party applicants however it is appropriate to consider that these could potentially be of relevance to the delivery timescales and technical approval requirements of National Highways assumed as part of this programming work. In short, it is likely to be a sensitive and complex part of the network given the wider development ambitions presented, and this may negatively impact the programme assumptions.</p>
Q19.0.12	<p>Work packages</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</p>	<p>From an LCC perspective the various packages of works shown for the area along the M1 shown on [REP1-054] hold no planning status and remain the private ambition of the referenced development consortium which continues to consider and develop these.</p>

	<p>example, for the joint application, at this stage we identified what, if any, highway and transport mitigation works might be necessary.</p>	<p>With regard to other projects, live planning application 25/00865/OUTM – Isley Woodhouse presents some findings and commentary from the East Midlands Growth Point scheme and a commitment to '15.15 <i>The ongoing testing of the East Midlands Growth Point scheme will include consideration of the requirement to upgrade the A453 to dual carriageway along the frontage of the EMG Phase 2 site.</i>' (ADC Infrastructure, Transport Assessment Isley Woodhouse April 2025) [REP1-179]. LCC understands the strategic assessment of this continues and awaits further submissions in due course. Likewise for other emerging allocations that have not yet been submitted formally.</p>
Q21.0.1	<p>Drainage monitoring and remediation measures</p> <p>Given the uncertainty about what is causing the flooding in the vicinity of Kegworth Bypass, as set out in LCC's response to Q21.0.3 [REP1-088], is it reasonable to strengthen the drainage monitoring and remediation measures in the dDCO [REP2-008D]?</p> <p>The ExP acknowledges there are already measures secured by requirement 17(3)(a). However, could further details be provided about the scope and extent of the measures that need to be submitted for approval?</p>	<p>LCC as the Lead Local Flood Authority (LLFA) requires the Applicant to re-visit the drainage modelling of the Kegworth bypass and the wider drainage network give the flooding issues that have occurred since its construction.</p> <p>LCC requests that this is done in collaboration with LCC in its capacities as LLFA and Local Highway Authority. Modelling shall be verified by an appropriately qualified third-party consultant. LCC would welcome the strengthening of the dDCO/MCO to ensure that this work and any associated mitigation is delivered.</p>

Furthermore, could there be a mechanism whereby abnormal local flood events trigger immediate investigation of the surface water drainage system to understand causation and whether it is operating as intended. If it is not operating as intended, does requirement 17(3)(a) need to establish a timescale for remediating action?

Finally, where part of the surface water drainage system is subsequently adopted by a third party, does there need to be a development consent obligation, or a Grampian requirement securing a development consent obligation if one cannot be agreed prior to the close of the examination, to ensure the duty to comply with the monitoring and remediation measures secured under requirement 17(3)(a) would be transferred to the relevant third party and that there would be no gaps in monitoring and remediation jurisdiction?

**East Midlands Gateway Phase 2 – East Midlands Gateway Rail Freight Interchange Material Change - LCC responses to Examining Panel (ExP) CAH2
Actions assigned to LCC – Deadline 4 – 16th June 2026**

ExP reference	Action	Response
AP No.38	To comment as local transport authority as to the content of the Trent Barton letter	LCC have liaised with the Prologis team with respect to the “Trent Barton letter”. The team have advised that they can find no reference to a letter but have provided LCC with a position statement which we understand will be submitted to the Examination by Prologis at Deadline 4. This position statement details the engagement between Prologis and Trent Barton over a period of time. LCC welcome’s this engagement, and its planned continuation.

**East Midlands Gateway Phase 2 – East Midlands Gateway Rail Freight Interchange Material Change - LCC responses to Examining Panel (ExP) ISH3 Actions
assigned to LCC – Deadline 4 – 16th June 2026**

ExP reference	Action	Response
AP No.41	Following the PRTM2023 update the latest positions in respect of Personal Injury Collision analysis	LCC have agreed a proposed methodology with the Applicant to assess the additional areas of Personal Injury Collision (PIC) analysis required following the additional transport analysis [REP1-058] undertaken by the Applicant to understand the additional impact of the 100,000sqm ‘mezzanine’ floorspace applied for on the Local Road Network (LRN). LCC

		understands that the Applicant is preparing an updated LRN note for submission at Deadline 4.
AP No.45	Without prejudice to its position, the applicants to provide a mechanism/ wording to require a longer period for free-bus tickets for employees at the site	<p>LCC understands that the Applicant is continuing to consider its position in regard to this matter.</p> <p>LCC met with the Applicant on the 29/05/2026 and explained that this should be a separate obligation to the bus fund. The Travel Plan and/or STS should commit to the provision of 1 x six-month bus pass per eligible employee. The Applicant team appear to have misunderstood that all eligible employees should be provided with the opportunity to apply for a bus pass. It is noted that not all applications will be taken up.</p> <p>The Applicant has committed to update proposals and provide further breakdown of costs and commitments to support the funding amounts proposed. The Applicant has also agreed to consider further using a s106 agreement to secure the necessary obligations. LCC await this further assessment and submissions which have not yet been received.</p>
AP No.53	Submit latest archaeological assessment, archaeological mitigation strategy into examination – LCC to provide a status update	LCC understands that the Applicant will be submitting the latest archaeological assessment and Archaeological Mitigation Strategy into examination at Deadline 4. On the basis the documents previously shared with LCC are submitted to the Examination without amendments,

		<p>these are agreed with LCC with no outstanding matters. This position is reflected in an updated SoCG.</p>
<p>AP No. 64</p>	<p>To set out their respective cases in relation to the proposed disapplication of section 141 of the Highways Act 1980 and section 55(1) and (1A) of the New Roads and Street Works Act 1991, including:</p> <ul style="list-style-type: none"> (i) the applicant's justification as to why these provisions are necessary in this case, with reference to precedent where relied upon (ii) the Council's justification as to why the proposed disapplication would be inappropriate. (iii) to work to see if an agreed position can be secured. 	<p>Miscellaneous controls - Schedule 14 – Paragraph 2 [REP2-009D] LCC does not agree with the disapplication of Section 141 of the Highways Act 1980. LCC may require this power to implement works for the dualling of the A453.</p> <p>Schedule 14 – Paragraph 3 LCC does not agree with the disapplication of Section 56(1) and 1(A) of the New Roads and Street Works Act 1991 to remove requirements for road space booking approvals. LCC has a role to co-ordinate access to the Local Road Network. Removal of this power would result in a loss of co-ordination, and potential for clashes where other developers/statutory undertakers/LCC have legitimately and in good faith followed an established legal process to secure road space booking.</p> <p>In addition, this process is in place to ensure that road works on this sensitive part of the highway network do not clash with significant events at the Donington Park Race Circuit, and peak operational times for passenger and freight movements associated with East Midlands Airport.</p>

		<p>Furthermore, the road space booking process also takes account of scenarios where the A453 may act as a diversion route for works on other parts of both the Local and Strategic Road Networks. Loss of control of co-ordination could lead to significant network co-ordination issues with fundamental highway safety concerns.</p> <p>Schedule 14 – Paragraph 3 LCC does not agree with the disapplication of Section 58(1) of the New Roads and Street Works Act 1991 to restrict works in 12 months following substantial completion of works. This could fetter delivery of works brought forward by LCC or third parties (including statutory undertakers) including works necessary for the safe operation of the public highway. This is also the case for Section 73A(1).</p> <p>Schedule 14 – Paragraph 3 LCC does not agree with the disapplication of section 74 and 74A of the New Roads and Street Works Act 1991. Charges will be made for LCC Officer time to cover the cost of road space booking process and procedures in line with those charges incurred by all developers/statutory undertakers/LCC for the same service.</p> <p>LCC contacted the Applicant team again following ISH3 and unfortunately still awaits engagement on this matter and those relating to the dDCO and dMCO as outlined below.</p>
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AP No. 65	To reconsider the article 5 and requirement 32 in relation to “a campus / headquarters including co- located head office functions” in conjunction with LCC	LCC contacted the Applicant team again following ISH3 and unfortunately still awaits engagement on this matter and those relating to the dDCO and dMCO as outlined below.
AP No. 66	Due to the number and nature of the points discussed during agenda item 10 (dDCO) and 11 (dMCO), all parties including the applicants, local planning authority, LCC and National Highways are requested to refer to their notes and/ or the recording of the hearing on and provide written submissions addressing the matters raised in relation to the articles and schedules of the draft Development Consent Order and/or draft MCO.	<p>As set out in REP1-087 LCC has raised a number of concerns with the Applicant team regarding the drafting of the dDCO and dMCO. It is unfortunate that despite LCC efforts to contact the Applicant team, offering availability to meet, and ExP requests for parties to work together to resolve matters where possible, that LCC awaits contact and engagement. Matters that remain outstanding are set out in the table below.</p> <p>Narrative on proposed requirement no. 31 – Safeguarded land can also be found below.</p>

Examination library reference	Document name	Leicestershire County Council (LCC) comments on dDCO/MCO
REP2-009D	DCO 3.1 Draft Development Consent Order (dDCO) (April 2026)	<p>Requirements LCC consider to be missing from the DCO:</p> <ul style="list-style-type: none"> • Public Rights of Way – LCC raised concerns with the Applicant about the absence of a requirement for the implementation of works to Public Rights of Way. The Applicant is reliant on Schedule 5 of the DCO. LCC in its capacity as Local Highway Authority consider the commitment should be explicit in the Order and not implicit. This remains a matter of disagreement between LCC and the Applicant • Construction Traffic Management Plan (CTMP) - LCC raised concerns with the Applicant about the absence of a requirement to implement the CTMP. The Applicant had previously advised that they were considering amendments to Requirement 11 to address this matter. However, this is yet to be addressed. • HGV Route Management - LCC raised concerns with the Applicant about the absence of a requirement to control HGV routeing to and from the site. The Applicant had previously advised that they were considering inclusion of such a requirement. However, this is yet to be addressed. • Safeguarded land – LCC welcomes the inclusion of Requirement no. 31 to safeguard land along the EMG2 main site frontage with the A453 for future dualling. However, as raised by LCC at Deadline 2 [REP2-046] the submitted plan [REP1-024D] does not go far enough in securing land across the entire site frontage.

		<p>Requirement 4 - Sustainable transport – LCC raised concerns with the Applicant that this requirement as drafted is overly complicated and would cause issues for monitoring and enforcement. LCC have requested that the Applicant separates out this requirement and includes separate requirements that cover sustainable transport/public transport provision and Travel Plans. However, this is yet to be addressed.</p>
		<p>Requirement 7 – Detailed Design Approval – LCC raised concerns with the Applicant that reference to provision of a quantum of vehicle charging points has been omitted from the dDCO. However, this is yet to be addressed.</p>
		<p>Requirement 17 – Flood Risk and Surface Water Drainage – LCC has consistently raised concerns with the Applicant regarding the wording of this requirement as reflected in [RR-002 and REP1-087]. Whilst LCC welcomes the amendments it does not consider that the wording goes far enough. This should be amended to state <i>"Each phase of the authorised development must be carried out and maintained in accordance with the surface water drainage scheme approved for that phase."</i></p>
		<p>Requirement 27 – Mezzanine LCC and NWLDC have raised concerns with the Applicant that this requirement cannot be monitored or enforced, and on this basis have suggested assessment of the full quantum of development to understand impacts and suitability of the proposed mitigation strategy.</p>
		<p>Article 13 – Accesses - LCC understands that the Applicant is considering whether temporary construction access will be required to the LRN. LCC are yet to receive confirmation from the Applicant and therefore reserves the right to respond to this matter in detail once this information has been received.</p>
		<p>Article 19 – Discharge of water -LCC is not aware of any proposed surface water discharge to combined systems. LCC awaits confirmation from the Applicant.</p>

		<p>Consultee in requirements - LCC in its statutory capacity as Local Highway Authority would expect to be named as a consultee in all requirements relating to highways and transport. LCC have requested that the Applicant revisit the wording of requirements on this basis. However, this does not appear to have been addressed.</p> <p>Schedule 5 Part 1 Public Rights of Way LCC have requested that the Applicant consider if L45/L57 can be granted cycle track designation in addition to PRoW designation i.e. if cycle track designation is granted, will these rights of way be lost from the definitive map. LCC remains concerned about the potential loss of PRoW from the definitive map. LCC understands that the Applicant may have a proposed way forward on this matter and awaits submission of further information.</p> <p>Schedule 5 Part 2 New Public Rights of Way to be created LCC have advised the Applicant that the proposed Public Right of Way between points 16 to 6 on Access and Rights of Way Plan sheet 1 of 2 [APP-037D] offers no wider public benefit and should be designated as a permissive path to be maintained by the Applicant in perpetuity. LCC understands that the Applicant now accepts this position and LCC awaits submission of amended drawings and a revised dDCO at Deadline 5.</p> <p>Schedule 13 Part 2 Protective Provisions LCC has raised the following concerns with the Applicant:</p> <ul style="list-style-type: none"> • Drafting is overly complex and will be difficult to manage/implement • Drafting does not replicate LCC standard s278 provisions • Drafting does not reflect LCC bond requirements as set out at: https://www.leicestershirehighwaydesignguide.uk/fees-and-charges
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		<ul style="list-style-type: none"> • LCC fees shall be set at 10% as is the LCC standard approach (and the standard approach of numerous Highway Authorities across the Country). LCC does not have the back-office systems or support to calculate and re-charge fees on a cost basis. • No reference is made to the adopted LCC Highway Design Guide available at: https://resources.leicestershire.gov.uk/environment-and-planning/planning/leicestershire-highway-design-guide • Definition of “as built drawings” is missing reference to: <ul style="list-style-type: none"> ○ Landscape drawings ○ Highway drainage drawings • Commuted sums should be payable <u>prior</u> to the issue of a Final Certificate • No provision is included for the dedication of public highway <p>LCC has received revised suggested wording from the Applicant for review ahead of Deadline 5.</p>
		<p>Miscellaneous controls - Schedule 14 – Paragraph 2 LCC does not agree with the disapplication of Section 141 of the Highways Act 1980. LCC may require this power to implement works for the dualling of the A453.</p> <p>Schedule 14 – Paragraph 3 LCC does not agree with the disapplication of Section 56(1) and 1(A) of the New Roads and Street Works Act 1991 to remove requirements for road space booking approvals. LCC has a role to co-ordinate access to the Local Road Network. Removal of this power would result in a loss of co-ordination, and potential for clashes where other developers/statutory undertakers/LCC have legitimately and in good faith followed an established legal process to secure road space booking.</p>

		<p>In addition, this process is in place to ensure that road works on this sensitive part of the highway network do not clash with significant events at the Donington Park Race Circuit, and peak operational times for passenger and freight movements associated with East Midlands Airport.</p> <p>Furthermore, the road space booking process also takes account of scenarios where the A453 may act as a diversion route for works on other parts of both the Local and Strategic Road Networks. Loss of control of co-ordination could lead to significant network co-ordination issues with fundamental highway safety concerns.</p> <p>Schedule 14 – Paragraph 3 LCC does not agree with the disapplication of Section 58(1) of the New Roads and Street Works Act 1991 to restrict works in 12 months following substantial completion of works. This could fetter delivery of works brought forward by LCC or third parties (including statutory undertakers) including works necessary for the safe operation of the public highway. This is also the case for Section 73A(1).</p> <p>Schedule 14 – Paragraph 3 LCC does not agree with the disapplication of section 74 and 74A of the New Roads and Street Works Act 1991. Charges will be made for LCC Officer time to cover the cost of road space booking process and procedures in line with those charges incurred by all developers/statutory undertakers/LCC for the same service.</p>
	Rule 6 letter - R6D19	<p>Signage – LCC awaits confirmation from the Applicant of what existing signage on the Local Road Network is proposed to be amended.</p>
REP2-011M	MCO 3.1 Draft Material Change Order (Revision 3)	<p>LCC maintains that all proposed works at the existing EMG1 access should be captured in the MCO and not split between the MCO and the DCO. LCC awaits a response from the Applicant on this matter</p>

Requirement 31 – Safeguarded Land [REP2-009D] – Leicestershire County Council justification for inclusion, including reference to policy tests within the National Planning Policy Framework 2024 as requested by the ExP at ISH3

Leicestershire County Council has worked proactively with developers and stakeholders to seek to support the delivery of growth and realise the benefits of the East Midlands Freeport (EMF) designation in the absence of a plan led and/or holistic delivery strategy for the wider EMF and emerging Local Plan growth. LCC is engaged proactively in a number of workstreams and projects with EMF, relevant developers and stakeholders to ascertain the extent of transport impact and necessary mitigation and delivery strategy required to unlock cumulative growth. National Highways remain a key stakeholder and participant in these discussions and both parties have worked closely and collaboratively given the interrelatedness of proposals on the Local and Strategic Road Networks (SRN). LCC and NH continue to work with colleagues at Nottinghamshire County Council, Derbyshire County Council, and the East Midlands Combined County Authority. However, not all information from these workstreams is publicly available, and to assist the ExP, the Applicant and Interested Parties may wish to consider what information they are willing to share in the public domain.

Transport work from a number of sources points to the requirement for significant strategic interventions including link capacity improvements along the A453 to provide capacity for the anticipated growth coming forward in this area. Relevant planning applications and supporting assessments on behalf of Manchester Airport Group (MAG), SEGRO and promoters of the Isley Woodhouse new settlement acknowledge this position, and this is reflected in their relevant submissions [REP1-053, REP1-179]. LCC note that the land available to provide the opportunity to widen the existing A453 carriageway in proximity to East Midlands Airport and Finger Farm roundabout is understood to be currently under the ownership of MAG. Although proposed widening of the A453 is on the local road network, National Highways have confirmed the importance of the safeguarding of land because of the potential impacts on the operation of Finger Farm Roundabout (SRN) if the dualling cannot be implemented in the future and the strategic importance that the A453 plays in the operation and connectivity of the M1 and M42.

The spatial strategy of the emerging North West Leicestershire District Council (NWLDC) Reg19 Local Plan looks to allocate significant commercial and residential development in the Castle Donington, A453/M1 J24 area; a mix of new housing and employment in relatively close proximity to one another should help to promote people living and working in the same area in the interests of sustainable development. Whilst the full quantum of this growth may inevitably extend beyond this emerging local plan period for example only 1,950 homes are assumed from Isley Woodhouse up to 2042, the adopted spatial strategy would concentrate transport impacts in and around this geographical area which will inevitably lead to significant strategic impacts on the local and strategic road networks. LCC understands transport work supporting the emerging NWLDC local plan continues. However, LCC also notes that the NWLDC Consultation draft Reg19, which was agreed at NWLDC Local Plan Committee¹ on the 4th June 2026 and Cabinet² and Council³ on 11th June 2026, includes relevant plan policy to safeguard land for dualling of the A453.

Draft Policy EMP90 – Land South of East Midlands Airport includes:

“(f) Ensure the site layout incorporates a corridor of land along the entirety of the site’s A453 frontage sufficient to accommodate the additional land required for the dualling of A453 between the Finger Farm roundabout and the entrance to East Midlands Airport.”

The position taken by LCC through the EMG2 DCO examination seeks to best align with the emerging NWLDC Local Plan policy for the proposed development site which would rely upon this emerging Plan Policy for its spatial allocation.

As discussed through the Issue Specific Hearings for EMG2, LCC understands the basis for the strategic infrastructure proposals for EMG2 stems from a more comprehensive package of measures intended to support a consortium of developers and growth aspirations in the local area. This has been referred to as the Growth Point Consortium, and it is noted that dualling of the A453 and associated Finger Farm improvements forms part of a more comprehensive package of mitigation on the LRN and SRN [REP1-053]. Whilst the current Growth Point proposals hold no current policy weight or backing, it does signify commitment to a range of transport infrastructure measures that extends beyond the proposals included as part of the EMG2 DCO submission and deemed necessary infrastructure to support the delivery of cumulative development.

Again, the Isley Woodhouse planning submission (25/00865/OUTM) [REP1-179] commits to the anticipated inclusion of the A453 dualling amongst other strategic initiatives though it is noted such an aspiration appears to be on land outside of the applicant’s control. Importantly, the live application for Isley Woodhouse must consider the total quantum of residential growth for this development which is understood to extend beyond the emerging Local Plan period and for which a comprehensive delivery strategy is hoped still can be developed. Notably the emerging East Midlands Freeport Strategic Infrastructure and Contributions Supplementary Planning Document (SPD)⁴ for this area was discussed at ISH3 which, whilst not currently benefitting from any planning status, shows the public authority commitment to pursue a comprehensive funding and delivery strategy to support the development of significant employment and housing. LCC note this is to be considered by North West Leicestershire District Council’s Cabinet⁵ on the 23rd June 2026.

LCC in its capacity as Local Highway Authority has been presented with plans showing land to be safeguarded alongside the A453 as part of relevant planning applications which is important given the policy requirements of the EMP90 emerging commercial EMF allocation. LCC places a very high priority on ensuring this land is safeguarded through any grant of planning permission to ensure future link capacity improvements as indicated to be required can be delivered. Evidence, including that which is submitted in support of the EMG2 proposals [APP-080], demonstrates significant link and junction capacity challenges in forecast scenarios. LCC acknowledge that the cumulative growth assessed in forecast modelling for EMG2 contains residential and commercial development growth which does not yet have established mitigation strategies which have therefore not been coded into the referenced PRTM forecast modelling [APP-082]. LCC and National Highways positions on EMG2 therefore have sought to find a pragmatic balance between supporting the delivery of growth in advance of a plan or strategic delivery strategy but remaining vigilant to the risk of premature delivery or planning approvals that could stymie future sustainable growth.

It is highly likely that the residual cumulative impact of wider forecast growth will be demonstrated to be severe in accordance with the National Planning Policy Framework 2024 and would therefore prejudice the delivery of wider sustainable growth in accordance with emerging Plan policies. Therefore, LCC welcomes the developer's intentions to provide this safeguarded land to enable future growth and link capacity enhancements to come forward through emerging growth, but this must include land across the entire site frontage. LCC have advised that this land being dedicated as public highway would remain the most appropriate mechanism to support this approach and would welcome the opportunity to work with the applicant to develop the DCO drafting to ensure the agreed mechanism is appropriate and enforceable with certainty over the delivery and timing of its dedication.

¹ <https://minutes-1.nwleics.gov.uk/ieListDocuments.aspx?CId=344&MId=2858>

² <https://minutes-1.nwleics.gov.uk/ieListDocuments.aspx?CId=126&MId=2916>

³ <https://minutes-1.nwleics.gov.uk/ieListDocuments.aspx?CId=129&MId=2921>

⁴ <https://minutes1.nwleics.gov.uk/documents/s51478/EAST%20MIDLANDS%20FREEPORT%20CONTRIBUTIONS%20SPD%20Cabinet%20Report.pdf>

⁵ <https://minutes-1.nwleics.gov.uk/ieListDocuments.aspx?CId=126&MId=2751>