

**East Midlands Gateway
Phase 2 (EMG2)**

DCO 7.16 / MCO 7.16

Applicants' Response to Examining Panel's Second Written Questions

JUNE 2026

The East Midlands Gateway Phase 2
and Highway Order 202X and The East Midlands Gateway
Rail Freight and Highway (Amendment) Order 202X

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**The East Midlands Gateway Phase 2 and
Highway Order 202X and The East Midlands
Gateway Rail Freight and Highway (Amendment)
Order 202X**

**APPLICANTS' RESPONSE TO EXAMINING PANEL'S
SECOND WRITTEN QUESTIONS**

(DOCUMENT DCO 7.16 / MCO 7.16)

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1 Introduction

- 1.1 This document relates to the applications for a second phase at East Midlands Gateway Logistics Park (EMG1), being an application for a Development Consent Order (DCO) made by SEGRO Properties Limited (DCO Applicant) and an application for a Material Change Order (MC) made by SEGRO (EMG) Limited (MCO Applicant). The DCO Applicant and the MCO Applicant are together the "Applicants".
- 1.2 This document has been prepared by the Applicants to set out their responses to the Examining Panel's (ExP) Second Written Questions issued on 2 June 2026 [\[PD-022\]](#). This document is submitted at Deadline 4 of the Examination.

2 Applicants' Response

- 2.1 The Applicants' response to the ExP's Second Written Questions is set out in the tables in Appendix 1 to 23 of this document.
- 2.2 The same abbreviations as set out in the ExP's Second Written Questions has been adopted. For ease of reference, these are included in Appendix 24 to this document.
- 2.3 Where a response refers to an annexure, this can be found at the end of this document. Annexures are numbered using the relevant Appendix number followed by a letter (A, B, C, etc.).

APPENDIX 1

GENERAL AND CROSS-TOPIC QUESTIONS

ExQ2	Question to:	Question:	Applicant's Response
1. General and cross-topic questions			
1.0 Consideration of application – general matters			
Q1.0.1	The applicants	<p>Change log for application documents</p> <p>Please can the applicants provide a change log for each application document at each deadline hereafter. The change log should comprise three columns. The first column should list the documents, with hyperlinked examination library reference numbers, that have been changed since the previous deadline. The second column should provide a summary that is proportionate but still of sufficient substance to fully understand what was changed and why it was changed. The third column should identify the catalyst for the change and use hyperlinked examination library reference numbers accordingly.</p> <p>For example, if the LEMP was changed to include new requirements in relation to ecology surveys in response to interested party comments, the first column would list the LEMP, the second column would summarise the new requirements and why they were necessary in light of the interested party comments, and the third column would identify the document within which the interested party comments were made.</p> <p>The change log should be proportionate and focus on substantive changes that affect how likely significant effects are assessed and that might be important and relevant to the</p>	<p>The Applicants have incorporated the change log into the application documents tracker for the DCO Application [REP3-004D] and MCO Application [REP3-002M].</p>

ExQ2	Question to:	Question:	Applicant's Response
		<p>Secretary of State's decision. It does not need to include every minor change made to every document. The ExP is content for the change log information to be incorporated into the application documents tracker for the DCO application [REP3-004D] and MCO application [REP3-004D], if this is a workable solution.</p>	
Q1.0.2	The applicants	<p>Areas of individual Works</p> <p>Could the applicants' please set out a table showing the areas in square metres of each of the individual works as set out in schedule 1 of the draft DCO.</p>	Please see the table found at Annex 1A . Note that this is reflective of the minor amendment made to Works No. 14.
Q1.0.3	The applicants	<p>Examination Issues Tracker</p> <p>Appendix 7 and 8 of the applicants' response to relevant representations [REP1-051D] sets out responses to "other interested parties" and the "local community" respectively. It is not clear to the ExP whether these are fully addressed in the Examination Issues Tracker [REP2-028]. Please can the applicants review and update if necessary.</p> <p>Furthermore, to make the Examination Issues Tracker a more efficient and effective tool, please could the applicants hyperlink the examination library reference numbers, and also expand the summaries so that they provide more useful detail.</p> <p>For example, under issue 3 it would be useful to see more of what Kegworth Parish Council said about the nature and extent of natural environment losses. Furthermore, it would be useful to see more of the applicants' rebuttal position – instead of a vague signpost to the ecology and biodiversity assessment in the Environmental Statement.</p>	The Applicants will provide an updated Examination Issues Tracker [REP2-028] addressing these points at Deadline 5.

ExQ2	Question to:	Question:	Applicant's Response
Q1.0.4	The applicants	<p>20% advanced manufacturing floorspace</p> <p>The applicants responded to Q1.2.8 of ExQ1 [REP1-054] and subsequently responded to NWLDC's response to the same question [REP2-032], stating that a 20% limitation was not necessary because B2 trip rates have been assessed as a worst case scenario in the Environmental Statement. For clarity, what percentage of trips were assigned to B2 in the Environmental Statement, and should this percentage be secured as a limitation in the dDCO?</p> <p>For example, if the Environmental Statement assessed trip rates based on 20% B2, without limitation could the proposed development come forward with 40% B2 and thereby have greater significant effects than those assessed in the Environmental Statement? Consequently, does it follow that B2 should be limited to 20% in the dDCO?</p>	<p>20% of the trips have been assigned to B2 use within the Transport Assessment and this data is used within the Environmental Statement.</p> <p>The Applicants are considering the need for such a restriction in light of the above and whether that should be included with the dDCO or included on the Parameters Plan.</p>
Q1.0.5	<p>The applicants</p> <p>Prologis</p> <p>EMIA</p>	<p>Section 35 direction</p> <p>The ExP appreciates that this matter was discussed during CAH2 and that associated action points will be addressed accordingly. Supplemental to those, please can the parties explain whether the SoS has discretion to allow the development secured by the DCO to deviate from the wording of the s35 direction provided that it would be sufficiently similar in nature and scale to remain nationally significant? As such, would it be open to the SoS to consider the matter in terms of "fact and degree" during their decision or would they be bound by the exact wording of the s35 direction?</p>	<p>The Applicants have provided a written response to the Prologis Deadline 2 submission addressing this point. That response is at Appendix 6 paragraphs 2.1 to 2.16 in DCO 7.13 / MCO 7.13 Applicants' Response to Deadline 2 and 3 Submissions.</p>

ExQ2	Question to:	Question:	Applicant's Response
Q1.0.6	The applicants	<p>Operational and Environmental Management Plan</p> <p>Please can the applicants provide an update on the progress toward defining "operational environmental management plan" in consultation with the Environment Agency, and potentially North West Leicestershire District Council (NWLDC), for which there is a placeholder in the dDCO [REP2-008D] under requirement 33(2).</p>	<p>The Applicant has proposed a definition of "operational environmental management plan" (OEMP) which is now with the EA (and NWLDC) for their consideration.</p> <p>The Applicants confirm that the proposed scope and content of the "operation environmental management plan" remains under discussion.</p> <p>The Environment Agency has indicated that an <i>"Operational Environmental Management Plan (OEMP) will be a document that outlines controls and procedures to manage and mitigate environmental impacts during the operational phase, and can be used as a document in the DCO against which to secure commitments.....there may be elements of other technical specialism, i.e. Groundwater/Flood Risk/Biodiversity that can also be secured using this document. One of the main purposes of the OEMP will be to contain a Surface Water Management Plan for the operational phase, and ensure that any activities (although lessened when compared to construction) like having vehicles onsite and welfare facilities are managed appropriately....The structure would largely be similar to the CEMP, i.e. introduce the project, explain the role and responsibilities for those onsite during operation, list relevant legalisation and permits, environmental incident response and reporting, name specific environmental plans (like the Surface Water Management Plan), suggest how monitoring will be conducted, and consequently how monitoring results, incidents and near-misses will be reported and reviewed"</i>.</p> <p>It is anticipated therefore that the operation environmental management plan will identify how commitments made in the environmental impact assessment will be translated into actions during operation, and identify any additional licences, permits or approvals that are required, including any</p>

ExQ2	Question to:	Question:	Applicant's Response
			<p>environmental information submitted in respect of them. The plan will be a live document updated throughout the operation of the DCO Scheme as required, for example to reflect changes in legislation.</p> <p>A definition for the plan will be proposed in the dDCO [REP2-008D] to be submitted at Deadline 5.</p>
1.1 Other applications in vicinity			
Q1.1.1	Prologis	<p>Section 35 direction</p> <p>In the 'Applicants' Response to Deadline 1 Submissions' [REP2-032] in responding to the written representation from Prologis, in reference 5.7, there is a reference to "Prologis's current s35 Direction which they applied for". Could Prologis confirm whether or not it has made such an application for land on or in the vicinity of the application site, and if so, provide both a copy of the application, including any accompanying plan(s), and any subsequent direction issued by the Secretary of State.</p>	<p>The Applicants confirm that their reference to the application made for a Section 35 Direction by Prologis relates to the Daventry International Rail Freight Terminal IV Project, not the land subject to the DCO Application. See:</p> <p>https://www.gov.uk/government/publications/daventry-international-rail-freight-terminal-iv-project-section-35-direction-planning-act-2008</p>
1.2 Community matters			
Q1.2.1	The applicants	<p>Community park</p> <p>In light of annexure 1G in the responses to the ExP's written questions [REP1-054] the applicants have provided a plan showing the areas across the site where gradients are greater than 1 in 8. Given the extent of this across the northern part of the open space area, could the applicants explain how this would be made accessible for all, and particularly how those requiring lesser gradients travelling</p>	<p>The Applicants note that the original question (Q1.4.2) requested a plan showing "the areas of the site where gradients would be greater than 8% (1 in 12)" rather than 1 in 8.</p> <p>On an updated plan found at Annex 1B, the Applicants have shown the footpath (public and other) and bridleway routes through the community park onto the same plan that showed the gradients and have annotated the gradients along each path. This shows that the majority of the routes have</p>

ExQ2	Question to:	Question:	Applicant's Response
		<p>across the open space to the north and the A453 so that they would be able to access this.</p>	<p>gradients substantially flatter than 8%, including all of the routes that will be public rights of way. There is a small area around the northern drainage basins where there are paths that are slightly steeper, up to around 11% maximum. The Applicants have therefore added a further path into the community park to enable users who may struggle on these steeper paths to have maximum use of the northern part of the community park.</p> <p>With the confirmation of the gradients on the paths and addition of this further path, no barriers to access are anticipated, including for those who are more vulnerable and may have existing mobility issues.</p> <p>An updated Community Park Plan (DCO 2.16) is also provided at Deadline 4 to show the additional path.</p>
Q1.2.2	The applicants	<p>Community Park Plan</p> <p>The issue of competing usage across the community park has been raised in relation to several issues. In this context, please can the applicants provide a community park plan that shows all the relevant components and the associated space requirements of each, including any buffer zones or design standards required by policy or guidance. The role of the plan is to demonstrate to the ExP whether all the proposed components therein can be accommodated without any unacceptable spatial conflicts or tensions.</p>	<p>The Applicant has updated the Community Park Plan (DCO2.16), together with a supplemental Community Park Typologies Plan (attached at Annex 1C) to clearly identify the various proposed components within the Community Park and their spatial requirements. The revised plans together distinguish the key elements of the Community Park by highlighting the differing landscape typologies and a corresponding schedule including areas of landscape planting, drainage infrastructure, informal car parking and public access, and intrinsic areas for biodiversity. It is important to recognise that the Community Park has been conceived as a multifunctional space, where the various elements are intended to operate as part of a comprehensive and intrinsically integrated approach, rather than as discrete or necessarily competing land uses. Public access, landscape design, ecological enhancement and drainage</p>

ExQ2	Question to:	Question:	Applicant's Response
			<p>functions are therefore designed to work alongside one another in a complementary manner.</p> <p>The Applicant considers that the revised plan demonstrates that the proposed uses can co-exist appropriately within the available area without giving rise to unacceptable spatial conflicts. In respect of buffer zones, design standards or prescribed spatial requirements, North West Leicestershire District Council has no specific policy or guidance-based standards that apply to the Community Park in this context. However, the detailed composition and arrangement of the Community Park has been developed through engagement with North West Leicestershire District Council, other relevant consultees and the local community, with the approach and extent of the proposed uses agreed in principle with the Council. Accordingly, the Applicant does not consider there to be any unacceptable spatial conflicts between the proposed functions of the Community Park.</p>

APPENDIX 2

DESIGN, PARAMETERS AND OTHER DETAILS OF THE PROPOSED DEVELOPMENT

ExQ2	Question to:	Question:	Applicant's Response
2. Design, parameters and other details of the proposed development			
Q2.0.1	The applicants NWLDC NH	<p>Design review</p> <p>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.</p> <p>The applicants are asked to respond to the original question in respect of highway structures.</p> <p>NWLDC and NH are asked for their views as to whether Design Review should be a mandatory requirement within the design process.</p>	<p>The Applicant has provided a detailed response to Action Point 60 (DCO 7.15) submitted at Deadline 4 which includes express consideration of highway structures.</p>
Q2.0.2	The applicants	<p>Work no. 19</p> <p>In the 'Applicants' Post Hearing Submissions (PM, CAH1, ISH1 and ISH2) [REP1-052] item 6, when discussing Work No. 19 it is stated the works "relate to an upgrade of the existing footpath L57 running westwards from EMG1 to Castle Donington to deliver commuter cycle connectivity. The most direct route from Castle Donington to EMG2 is via footpath L57".</p> <p>Could the applicants' please explain how it is intended to facilitate access across the bund for cyclists to the west of</p>	<p>The active travel route between L57, EMG1 and EMG2 would not use the stepped footpath over the bund near Plot 16.</p> <p>The route would go along the EMG1 estate road and use the shared use footway cycleway over the bund that was built to connect EMG1 to Diseworth Lane. This route is a permissive cycle track as defined in the EMG1 DCO and shown between points 34-35-36-21-37 on the EMG1 Access and Rights of Way Plans Sheets 4 and 5 (EMG1 Documents 2.3D and 2.3E). Copies of these plans are provided at Annex 2A.</p>

ExQ2	Question to:	Question:	Applicant's Response
		Plot 16 given the current steps over the bund and the existing gradients, particularly as it is said that the "route from L57 ties in with the wider cycle improvements on the A453 between EMG1 and EMG2".	

APPENDIX 3

AGRICULTURE AND SOILS

ExQ2	Question to:	Question:	Applicant's Response
3. Agriculture and soils			
Q3.0.1	The applicants	<p>Topsoil reuse and control (BMV land)</p> <p>With reference to the applicants' response to ExQ1 Q3.0.2 [REP1-054] and Protect Diseworth's comments on the ExQ1 responses [REP2-057], please provide a concise statement of the expected proportion (%) of stripped topsoil from Grades 1, 2 and Subgrade 3a that will be reused on site and that exported off site. Please also identify where this outcome will be secured and/ or recorded.</p>	<p>The earthworks cut and fill assessment (Document DCO 6.14M Figure 5 [APP-173]) is based on a comparison of the existing ground levels against the proposed finished levels across the site, inclusive of Topsoil within the earthwork calculations.</p> <p>The volumes of Topsoil anticipated to be excavated from Grades 1, 2 and 3A across the EMG2 Works, based on exploratory hole records presented within Document DCO 6.14B [APP-155], equates to 6,000 m³, 27,520m³ and 85,760m³, respectively. As topsoil is included within the cut and fill allowance, no separate allowance has been made for surplus Topsoil / off-site export. It is therefore assumed at this stage that all Topsoil will be retained on site and reused in accordance with good practice, subject to confirmation of its suitability for reuse in landscaping by an arboriculturalist, and provided it is free from contamination.</p> <p>The management of soils and materials on site will be secured through the Construction Environment Management Plan (CEMP), including a Soil Management Plan.</p>
Q3.0.2	The applicants	<p>BMV cumulative effects technical note</p> <p>In response to ExQ1 Q3.0.5 [REP1-054] (cumulative effects on BMV land), the applicants stated that a technical note would be prepared and submitted at deadline 2. Please confirm whether this technical note has been submitted into</p>	<p>The Applicants technical note is enclosed at Annex 3A.</p>

ExQ2	Question to:	Question:	Applicant's Response
		the Examination and, if so, provide the relevant Examination Library reference; and if it has not been submitted, explain why and confirm when it will be submitted.	

APPENDIX 4
AIR QUALITY AND EMISSIONS

ExQ2	Question to:	Question:	Applicant's Response
4. Air quality and emissions			
The ExP has no further questions on this topic at this time.			N/A

APPENDIX 5

BIODIVERSITY, ECOLOGY AND NATURAL ENVIRONMENT (INCLUDING HABITATS REGULATIONS ASSESSMENT)

ExQ2	Question to:	Question:	Applicant's Response
5. Biodiversity, ecology and natural environment (including Habitats Regulations Assessment)			
5.0 Non-Habitats Regulations matters			
Q5.0.1	The applicants	<p>Final Landscape and Ecological Management Plan</p> <p>Requirement 10 was updated in the latest dDCO [REP2-008D] and is said to secure a final LEMP. However, does the wording make sense as written, and does it actually require a final LEMP to be submitted and approved?</p> <p>Moreover, it is not clear why the trigger point for the final LEMP is tied to the occupation of the final warehouse within the authorised development. The final LEMP would manage the implementation of the landscaping scheme, including ecological mitigation, secured by requirement 9. Therefore, logically, should the final LEMP be submitted and approved before components of the authorised development involving landscaping and ecological mitigation are commenced? Otherwise, the authorised development involving landscaping and ecological mitigation could be commenced and implemented in accordance with the existing LEMP, which may not reflect the details subsequently approved under requirement 9.</p> <p>The ExP notes the applicants' contention in its submission [REP2-032] in response to question 5.0.26 of ExQ1 that the LEMP is not in outline. However, further detailed design information would arise through the discharge of</p>	<p>The Applicants previous response to Q5.0.26 in REP2-032 clarified that the submitted LEMP [REP3-043] is sufficiently detailed such that Requirement 10 can secure adherence to it and does not require a further LEMP to be submitted prior to the commencement of development for example. The Applicants have however noted the ExP's comments and have updated Requirement 10 to improve clarity. The updated wording for Requirement 10 will be included within the dDCO to be submitted at Deadline 5.</p>

ExQ2	Question to:	Question:	Applicant's Response
		<p>requirements, including requirement 9. It would require updating so that it remained consistent with whatever further detailed design information came forward. Consequently, the LEMP as provided is not final, and whilst it may not strictly be outline in detail, it is interim in function.</p> <p>Please can the applicants review and amend the wording and structure of requirement 10 in light of the above.</p>	
Q5.0.2	NWLDC	<p>Replanting regimes</p> <p>Is NWLDC satisfied with the applicants' updated LEMP [REP3-043] and that the replanting regimes would ensure the long-term success of the proposed habitat creation together with enhancement?</p>	N/A
Q5.0.3	The applicants	<p>Standing advice</p> <p>Natural England has responded with standing advice on a number of issues and the ExP is not clear if the Environmental Statement accords with this standing advice. For example, standing advice on veteran trees includes specific buffer distances to veteran trees and ancient woodland because they are more vulnerable to disturbance and damage. However, we have been unable to determine what buffer distances have been applied and whether they accord with the relevant standing advice. Please can the applicants review all of the standing advice identified by Natural England and demonstrate accordance with it or justify departure from it.</p>	<p>The Applicants have reviewed where Natural England has directed the Examining Authority to standing advice. The following confirms accordance with the relevant advice in each case.</p> <p>Ancient woodland</p> <p>There is no ancient woodland within the Order Limits. The standing advice minimum 15m buffer is not engaged by any direct works. No loss or deterioration of ancient woodland is proposed.</p> <p>Ancient and veteran trees</p> <p>The standing advice requires a buffer of at least 15 times the diameter of a veteran tree, or 5m from the edge of the canopy where larger. Tree protection during construction is secured through the CEMP ([REP2-026D], paragraph 16.6), which requires protective fencing at distances based on BS</p>

ExQ2	Question to:	Question:	Applicant's Response
			<p>5837:2012 root protection zones. Six veteran trees are retained and buffered in accordance with the LEMP Veteran Tree Strategy ([REP3-043], Appendix B). Where loss of veteran trees is unavoidable, a bespoke compensation strategy is provided, including deadwood monolith creation, soil translocation and c.19ha of new habitat creation. Natural England has confirmed at SoCG row 4.9 ([REP2-039]) that it has no specific comments on veteran trees outside designated sites. Further to this, the Forestry Commission has confirmed in their SoCG ([REP1-080]) that they agree with the assessments of the trees and that a proportionate compensation strategy has been proposed.</p> <p>The supplementary Figure Veteran Tree Buffer Plan (enclosed at Annex 5A) has been produced to show the retained veteran trees and their buffer zones in relation to the proposed development.</p> <p>Air Quality</p> <p>The Applicants' assessment follows Natural England's sequential approach as recommended through engagement with Natural England, with detailed dispersion modelling across all four pollutant pathways. The full methodology and conclusions are set out in ES Chapter 9, Appendix 8H, and the Applicants' response to ExQ1 Question 1.5.1.</p> <p>Protected species</p> <p>Natural England's standing advice notes that surveys needed to support post-consent licence applications are already required as part of the licence application process and need not be separately secured in the DCO. The Applicants' approach is consistent with this. Pre-commencement survey requirements are embedded in the CEMP, secured by</p>

ExQ2	Question to:	Question:	Applicant's Response
			<p>Requirement 11. Letters of No Impediment have been issued for bats and badgers, and the District Level Licensing scheme is in place for great crested newts.</p> <p>Badgers</p> <p>Natural England confirmed that licences will be required for works impacting badgers. A Letter of No Impediment has been issued confirming no impediment to licensing post-consent. The Badger licence application is being modified to reflect comments received from Natural England on 08.06.26. These comments are minor and are not anticipated to affect the issuing of an updated LONI.</p> <p>Updated pre-commencement surveys will be undertaken within six months prior to formal licence application, as recorded in SoCG row 4.27 [REP2-039].</p>
Q5.0.4	<p>Natural England</p> <p>The applicants</p>	<p>Yellow items</p> <p>The Statement of Common Ground [REP2-039] and the Risk and Issues Log [REP1-234] include a number of yellow items requiring further information. For example, NE25 requires details and justification of the SuDS in relation to any badger setts. However, it is not clear whether this information must be submitted during the examination and then incorporated into the subsequent license application, or, whether this information is a matter for the license application alone. The ExP presumes the former, on the basis that the effect of the SuDS on the badgers etc. would need to be assessed pursuant to the EIA Regulations as a likely significant effect and any other relevant legislation and policy requirements engaged as part of a DCO application decision making process under the PA2008.</p>	<p>The Applicants' position is that the EIA assessment in ES Chapter 9 adequately assesses the principle of impacts on all relevant receptors, and that the yellow items identified in the Risk and Issues Log (REP1-234) relate primarily to details required for post-consent licence applications rather than matters that affect the conclusions of the EIA or the decision-making process.</p> <p>An updated SoCG has been prepared and submitted at Deadline 4. It records the latest position between the Applicant and Natural England. A number of matters remain 'under discussions', but these relate to ongoing discussions on the post consent licence applications or the detailed wording of dDCO Requirements, and will not necessitate any updates to the Environmental Statement or other relevant application documents.</p>

ExQ2	Question to:	Question:	Applicant's Response
		<p>Consequently, unless Natural England provide targeted reasons to the contrary, please can the applicants review the issues where further information has been identified as being necessary and update the Environmental Statement, and any other relevant application documents, accordingly.</p> <p>Additionally, can both parties review the Statement of Common Ground [REP2-039] to ensure it accurately reflects the Risk and Issues Log [REP1-234] and that there are no gaps in coverage.</p>	<p>With specific regard to NE25-27, the Applicant can confirm that the required details, including maps with buffer zones, construction methods and method statement content, will be addressed in the updated licence application requested by NE on 8 June 2026.</p>

APPENDIX 6
CLIMATE CHANGE AND ENERGY

ExQ2	Question to:	Question:	Applicant's Response
6. Climate change and energy			
The ExP has no further questions on this topic at this time.			N/A

APPENDIX 7

COMPULSORY ACQUISITION, TEMPORARY POSSESSION AND OTHER LAND RIGHTS CONSIDERATIONS

ExQ2	Question to:	Question:	Applicant's Response
7. Compulsory acquisition, temporary possession and other land rights considerations			
Q7.0.1	Prologis	<p>'Ransom' value</p> <p>In the report in Annex A of [REP3-061], in footnote 13 to paragraph 4.13 the author provides a list of cases. Could these please be fully referenced and provided as a single document.</p>	N/A
Q7.0.2	<p>The applicants</p> <p>Prologis</p> <p>EMIA</p>	<p>Alternatives</p> <p>Can the applicants provide further information about the negotiations they have had with affected persons (principally East Midlands Airport and Prologis) about entering into a joint venture to develop both northern and southern parcels of land subject to the EMG2 main site?</p> <p>For example, whilst the ExP acknowledges the applicants have provided some high level chronology of engagement, is there any further information about the details of the joint venture that was discussed, options for how the land might be jointly developed and any other alternatives to compulsory acquisition duly explored?</p> <p>For clarity, does East Midlands Airport or Prologis dispute as a matter of fact whether the negotiations took place as set out in the applicants' response to relevant representations</p>	<p>Prologis UK Limited, Prologis UK 121 Limited, East Midlands International Airport Limited and East Midlands Airport Property Investments Limited ("NDA"). Certain correspondence between the parties has also been made on a without prejudice basis. The DCO Applicant is content to disclose all information and correspondence covered by the NDA and without prejudice; however, Prologis and EMIA have not agreed to such disclosure or to waive the without prejudice. Accordingly, the level of detail provided at Annex 7A reflects these constraints.</p>

ExQ2	Question to:	Question:	Applicant's Response
		[REP1-051D], or do their objections principally relate to the substance of negotiations that took place?	
Q7.0.3	The applicants	<p>Timing of when alternatives were explored</p> <p>In light of the Prologis submissions [REP2-050D] relating to the timing of when alternatives should have been explored, please can the applicants explain the importance of timing and evidence how this was taken into account during their exploration of alternatives?</p>	The Applicants have included this information in the detailed response provided at Annex 7A .
Q7.0.4	The applicants Prologis EMIA	<p>Exercise of compulsory acquisition powers</p> <p>Paragraph 1.19 of Prologis's submission in response to action point 2 [REP1-258D] sets out that if compulsory acquisition powers were exercised and the scheme then became undeliverable, there would be no mechanism to restore Prologis' position as there was in Morpeth. Please can the parties explain whether there are any remedies that could be secured in the dDCO, or that already exist in legislation, to restore the position of affected persons in the event compulsory acquisition powers were exercised but the scheme was not then delivered? For example, whilst the Crichel Down Rules apply to public sector bodies, could a version of those rules be tailored to the private developer context and secured by provisions in the dDCO?</p> <p>If a potential remedy could be secured or otherwise exists, how might this affect the assessment of private loss when determining whether compulsory acquisition is justified? For example, would the existence of a remedy mean private loss would be temporary and would this limit the resulting harm compared to permanent private loss?</p>	<p>The Applicants are not aware of any statutory provision which would provide for restoration of the land to the former landowner. It is generally accepted within the compulsory acquisition regime that, once powers are exercised, they cannot be undone. The Crichel Down Rules are policy and apply in only very limited circumstances where land becomes surplus to a public body's requirements.</p> <p>Compulsory acquisition powers are not pursued lightly and a high bar is set for securing them (i.e. complying with the statutory requirements set out in the PA 2008 and demonstrating that there is a compelling case in the public interest). This ensures that powers are not sought or granted speculatively. They are only sought and authorised where they are justified. In addition, where powers are granted then they are always time limited. Not only does this reduce the risk of land being acquired before it is needed, but it also ensures that if the powers are not exercised then the risk of acquisition falls away.</p> <p>Similarly, even when authorised, compulsory acquisition powers are not exercised lightly. They will likely only be exercised where the proposed development is viable and deliverable. This is because, once land has vested, the</p>

ExQ2	Question to:	Question:	Applicant's Response
			<p>affected person is entitled to seek compensation pursuant to the compensation code. The right to compensation is the primary statutory protection available to landowners affected by compulsory acquisition and presents a significant liability to the developer which they would not want to incur without a degree of certainty that the development is proceeding.</p> <p>Where land has been acquired and compensation has been paid, and potentially works have been undertaken on the land, then it is not suitable or appropriate for land to automatically be restored to the former landowner. Time will have passed and the landowner may no longer want the land to be returned to them. Or works may have been undertaken on the land which means that it is not suitable for it to be transferred back to the former landowner.</p> <p>For the reasons above and the fact that the DCO Scheme is both viable and deliverable with the Applicants having a proven track record for delivering similar schemes, the Applicants do not consider that any changes need to be made to the draft DCO to address this point. The Applicants are certainly not aware of any precedent for what the ExP proposes. Nor is there scope within PA 2008 for some form of Crichel Down Rules to be imposed (the Applicants do not consider that such a provision would be within the scope of section 120 or schedule 5 of PA 2008).</p> <p>Without prejudice to the above, if the ExP considered that such a mechanism was within the scope of the PA 2008 and were minded to recommend it, then it would need to be carefully drafted so that it remains within the proper scope of the PA 2008, is workable in practical terms, and does not undermine the deliverability or funding of the DCO Scheme. It would also need to recognise that a complete restoration of the affected person's pre-acquisition position may not be</p>

ExQ2	Question to:	Question:	Applicant's Response
			<p>possible where compensation has been paid, interests have been extinguished, third-party rights have been created, works have been carried out, or the character of the land has changed.</p> <p>The Applicants consider that, whilst the existence of a potential remedy is likely to be relevant to the assessment of private loss, it would not remove the need to justify compulsory acquisition at the point at which powers are sought. The statutory test remains whether the land is required for the authorised development, or to facilitate or be incidental to it, and whether there is a compelling case in the public interest for the compulsory acquisition. That assessment must still weigh the public benefits of the scheme against the interference with private property rights. A potential remedy, such as an offer back mechanism, could be relevant to that balance because it may reduce the loss to a temporary one and this could be treated as a mitigating factor when considering the severity of private loss. However, it would not make the loss merely temporary in all cases. It could even be argued in some cases that it might increase the private loss because it creates a position of greater uncertainty for the landowner for a longer period of time. A landowner may prefer the certainty of the land being acquired and compensation being paid without the uncertainty created by the knowledge that the land may ultimately be offered back.</p>
Q7.0.5	The applicants	<p>Private loss</p> <p>Paragraphs 17 to 21 of EMIA's submission [REP1-220] sets out that private loss has not been sufficiently assessed. Please can the applicants direct the ExP to where they have</p>	<p>In their submission [REP1-220], EMIA appear to be suggesting that the Applicants should have undertaken a standalone assessment of the nature and extent of private loss that would be suffered by them and other landowners. But that is not what the CA Guidance requires. The guidance states that "compelling evidence that the public benefits that would be derived from the compulsory acquisition will</p>

ExQ2	Question to:	Question:	Applicant's Response
		<p>explicitly assessed the nature and extent of private loss that would be felt by affected persons.</p>	<p>outweigh the private loss that would be suffered by those whose land is to be acquired". It accepts therefore that any compulsory acquisition will result in private loss and the test is instead whether the public benefits of the scheme as a whole — including the compulsory acquisition sought — outweigh that private loss. In other words, it is not a dissection exercise in which individual benefits must be assessed against individual private loss. Private loss will be different in each case and to assess it on an individual basis would be to apply an inconsistent test and result in different landowners being treated differently.</p> <p>In deciding to seek compulsory acquisition powers, the Applicants gave consideration to the private loss that would be suffered by landowners but they did not explicitly set out what that private loss would be for each landowner. It is not within the Applicants' knowledge to do. Rather, they considered private loss as part of the balancing exercising, weighing it against the public benefits which will derive from the DCO Scheme. The outcome of that assessment is set out in the Statement of Reasons [REP1-025D]. In particular, section 5 sets out the compelling case in the public interest and sets out the need for the land. Appendices 1, 2 and 3 of that document then set out why each parcel of land is required. Section 7 then considers the human rights of the landowners affected by the compulsory acquisition and the available remedies including the right to compensation.</p>

APPENDIX 8

THE DRAFT DEVELOPMENT CONSENT ORDER (DDCO) [REP2-008D]

ExQ2	Question to:	Question:	Applicant's Response
8. The draft Development Consent Order (dDCO) [REP2-008D]			
Q8.0.1	Leicestershire County Council (LCC) The applicants	<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>The Applicants have not provided a provision-by-provision response to the matters in REP1-087 at Deadline 4 because some matters are still under discussion, such as the protective provisions where the Applicants have provided a revised set to LCC for review and approval by Deadline 5. The Applicants are also due to submit an updated dDCO and dMCO at Deadline 5 which will pick up matters which have been under consideration, such as the comments raised by LCC in respect of public rights of way. It will also allow the resolved position to be identified in respect of matters such as revised drafting for Requirement 27 in respect of mezzanines, which was discussed during the hearings in held in May and has been the subject of further drafting and consideration by the relevant local authorities.</p>
Q8.0.2	The applicants	<p>Detailed design and ecological mitigation</p> <p>The applicants responded to Q5.0.27 [REP1-054] confirming that "the dDCO [PDA-004D] will be updated to ensure that ecological mitigation outside the main site is secured as appropriate. As regards the Community Park, [requirements] 7(2) and 9[1] of the dDCO will be updated to include reference to it".</p> <p>However, it is not clear that all the necessary changes were made in the subsequent dDCO update [REP2-008D]. For example, whilst additional text for the community park has been included in requirement 7(2) it is still not clear that the</p>	<p>The Applicants have noted the ExP's comments and are reviewing and updating, as necessary, Requirements 3, 9 and Schedule 13 as directed. The Applicants are also conducting a review of its ExQ1 responses to enable it to incorporate any further changes to the dDCO to be submitted at Deadline 5. The Applicants have, however, also responded to the points raised in the table at ExP's Annex 1 at Appendix 23 of this response document.</p>

ExQ2	Question to:	Question:	Applicant's Response
		<p>detailed design and delivery of ecological mitigation outside the main site is robustly secured.</p> <p>For example, ecological mitigation does not seem to have been imported into the definition of "detailed design information" in schedule 13 to secure it as part of National Highways' and Leicestershire County Council's prior approval protective provisions.</p> <p>Additionally, requirement 3 states that no component of the authorised development on the main site is to commence until details of the phasing of that component have been submitted and approved. Should the community park and substation sites be included in the wording of requirement 3 to ensure they are suitably phased alongside the main site?</p> <p>Furthermore, requirement 9 states no component of the authorised development on the main site is to commence until a landscaping scheme for that component has been submitted to and approved by the local planning authority. Should the community park and substation sites be included in the wording of requirement 9 to ensure they are subject to the landscaping scheme?</p> <p>Please can the applicants undertake a thorough review of the dDCO to ensure that the detailed design and ecological mitigation is adequately secured for each discrete area as defined within the dDCO. That is, land associated with the main site, the community park, the substation site, the strategic road network and the local road network. Please can the applicants update the dDCO accordingly.</p> <p>More broadly, please can the applicants also review their other responses to ExQ1, and responses to action points from hearings to date, to ensure that where they have</p>	

ExQ2	Question to:	Question:	Applicant's Response
		<p>committed to update the application, whether the provisions within the dDCO, sections within the Environmental Statement, or otherwise, that these updates have been actioned in full.</p> <p>To aid this review, the ExP has created a table (Annex 1) identifying some of the instances where updates are still pending. Please note, the applicants should still carry out a comprehensive review of their own, and it should not be limited to the instances identified in the ExP's table, which serves to illustrate the problem in outline.</p> <p>Any outstanding updates should be actioned and submitted by deadline 4.</p>	
8.1 Articles			
Q8.1.1	The applicants	<p>Article 38</p> <p>In discussing whether any distance outside the application site the applicants should be permitted to fell or lop trees and remove hedgerows the revised explanatory memorandum submitted at D2 [REP2-012D], the applicants indicate that the 15m distance has been "carefully considered".</p> <p>The ExP requests that the applicants set out the full justification for this distance setting out why it has been chosen.</p> <p>The applicants are also requested to explain how any distance outside the application site would comply with the Human Rights Act 1998, particularly with article 1 of the first protocol as set out in schedule 1 of the act, given that there is a strong possibility, if not a likelihood, that there will be</p>	<p>The 15m distance has been considered based on the likely worst case distance in the event that, for example, a Stage 3 Road Safety Audit identifies issues with visibility due to vegetation.</p> <p>The power is only exercisable where the tree, shrub or hedgerow are obstructing or interfering with the construction, maintenance or operation of the authorised development. The power is further restricted by the need to obtain approvals from relevant bodies where trees, shrubs or hedgerows are included within the landscaping scheme, a highway or are protected by tree preservation order. Article 38 also includes a compensation provision for any loss or damage incurred by the exercise of the power.</p> <p>The ExP will be aware that Article 1 of the first protocol in Schedule 1 of the Human Rights Act 1998 is a qualified right to peaceful enjoyment of property. The right is qualified</p>

ExQ2	Question to:	Question:	Applicant's Response
		some persons with interests in that land have not been notified under sections 42 and 44 of the PA2008.	because the right is not able to impair lawful control of property in the public interest. The Applicants consider the restricted power to prevent trees, shrubs and hedgerows obstructing or interfering with the authorised development, including highways works, represents a proportionate and appropriate interference which is in the public interest.
8.2 Schedule 1 – Authorised development			
Q8.2.1	The applicants	<p>Schedule 1</p> <p>At D2, in Works No 1 the applicants deleted the document number from part (b), however, it remains in part (c) of Works No. 3. Is there a reason for this, or should the latter be deleted?</p>	The Applicants confirm that the document number will be deleted from the dDCO submitted at Deadline 5.
Q8.2.2	The applicants	<p>Prior notification and approval of further works</p> <p>Pursuant to the ExP's previous question Q8.2.1 during ExQ1, please can the applicants provide a without prejudice draft requirement securing prior notification and approval of further works?</p>	<p>Without prejudice to the Applicants previous submissions to Q8.2.1 at Deadline 1 [REP1-054], the Applicant is not aware that the requested draft requirement has a precedent. Notwithstanding that in the absence of a precedent in any made DCOs, additional justification may be required to support the inclusion of such new wording, the Applicants have provided the following wording on a without prejudice basis which:</p> <p>(1) <i>No further works as identified in Schedule 1 which have not been approved pursuant to requirement 7 are to commence without providing 20 working days prior notification of such proposed further works to the local planning authority or in the case of the highway works, the relevant highway authority.</i></p> <p>(2) <i>If the local planning authority or relevant highway authority does not request further information within 20 working days of receipt it is deemed to have granted consent.</i></p>

ExQ2	Question to:	Question:	Applicant's Response
			(3) <i>Any notification must include a statement that the provisions of paragraph [2] apply to that notification.</i>
8.3 Schedule 2 – Requirements			
Q8.3.1	The applicants	<p>Requirement 11 – Construction environmental management plan</p> <p>In sub-paragraphs (1), (3) and (5) there are references to consultation with the Environment Agency. As set out it is ambiguous as to whether this consultation applies only to highways works or for all the authorised development. Could this be clarified.</p>	The Applicants confirm that the wording will be amended in the dDCO submitted at Deadline 5 to clarify that consultation with the Environment Agency applies to all of the authorised development.
Q8.3.2	The applicants	<p>Requirement 19 – Construction hours</p> <p>In sub-paragraph (1) it is not clear whether the three permitted 'out-of-hours' exemptions fall as part of the "unless otherwise agreed by the local planning authority" or separately. Could this be clarified.</p> <p>In exception (c), the ExP considers that the word "significant" lacks precision and asks the applicants to consider alternative terminology.</p>	<p>The Applicants confirm that "unless otherwise agreed by the local planning authority" applies in all instances.</p> <p>The Applicants confirm that the wording will be amended in the dDCO submitted at Deadline 5.</p>
Q8.3.3	The applicants NWLDC LCC	<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>	The Applicants confirm that the wording will be amended in the dDCO submitted at Deadline 5 to provide for this.

ExQ2	Question to:	Question:	Applicant's Response
Q8.3.4	The applicants	<p>Requirement 30 – Electric hook up facilities</p> <p>The ExP wonders whether this requirement would be better drafted as a negative, rather than a positive. That is preventing servicing by HGVs with chiller units unless electric hook up facilities are available (see guidance on drafting planning conditions in the PPG).</p>	The Applicants confirm that the wording will be amended in the dDCO submitted at Deadline 5 to provide for this.
Q8.3.5	The applicants	<p>Requirement 31 – Safeguarded land</p> <p>In requirement 31(3)(b) there would appear to be a typographic issue with "umber". If this should be a drawing number it may be easier to draft this by giving the drawing title, defining it in article 2, and including the drawing in schedule 16.</p>	The Applicants confirm that the wording will be amended in the dDCO submitted at Deadline 5 to provide a definition in article 2 and schedule 16.
8.4 Schedule 13 – Protective provisions			
Q8.4.1	<p>The applicants</p> <p>All those who would benefit from protective provisions</p>	<p>Protective provisions</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.</p> <p>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>	The Applicants confirm that they are in continuing negotiations to conclude the protective provisions so far as possible and that the amended dDCO to be submitted at Deadline 5 will include the latest protective provisions so far as they have been agreed.

APPENDIX 9

THE DRAFT MATERIAL CHANGE ORDER (DMCO) [REP2-010M]

ExQ2	Question to:	Question:	Applicant's Response
9. The draft Material Change Order (dMCO) [REP2-010M]			
Q9.0.1	The applicants EMIA	<p>Protective provisions in favour of East Midlands Airport</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.</p> <p>Where disagreements remain could EMA ensure that it submits an alternative version explaining why, by each specific provision, it holds that different drafting should be provided.</p>	<p>The Applicants confirm that discussions regarding aerodrome safeguarding remain ongoing, including in respect of draft protective provisions. EMA proposed draft Protective Provisions at Deadline 1; however, these are not acceptable to the Applicants. In particular, they represent a significant departure from what was agreed at EMG1 and from the approach adopted by EMA, as aerodrome operator and statutory consultee, in respect of both the Joint Application and the planning application for the Isley Woodhouse Development. EMA has provided no justification as to why the DCO Scheme should be subject to more stringent and onerous requirements than those imposed in connection with either of those two developments. The amended dDCO to be submitted at Deadline 5 will include the latest protective provisions so far as they have been agreed.</p>

APPENDIX 10
GROUND CONDITIONS

ExQ2	Question to:	Question:	Applicant's Response
10. Ground Conditions			
The ExP has no further questions on this topic at this time.			N/A

APPENDIX 11

HISTORIC ENVIRONMENT

ExQ2	Question to:	Question:	Applicant's Response
11. Historic environment			
Q11.0.1	The applicants	<p>Preservation by record</p> <p>In their response to ExQ1 Q11.0.4 [REP1-054] the applicants have referred to the effects being "offset" by record. Of the various definitions of "offset" in the Concise Oxford English Dictionary, the relevant one is "a consideration or amount that diminishes or balance the effect of an opposite one". Could the applicants please explain the difference between "mitigation" and "offset", and reconsider the proposed changed paragraphs for chapter 12 of the ES.</p>	<p>In this instance, the term 'offset' is being applied in terms of the mitigation hierarchy as set out in the IMEA guideline <i>Implementing the Mitigation Hierarchy from Concept to Construction 2024</i>, as the last resort of the mitigation hierarchy where avoidance, prevention or minimisation of the impact cannot be achieved. Alternatively, the term 'compensation' could be applied instead of offset. It is understood that the archaeological investigations will not reduce the overall impacts or effects but will serve to offset such impacts and effects by allowing the archaeological potential to be released through recording and publication. Paragraph 3.23 of LA 104 of the Design Manual for Roads and Bridges 2020 clarifies that offsetting can be applied <i>'where it is not possible to avoid or reduce a significant adverse effect, these are measures to offset the effect'</i>.</p>
Q11.0.2	The applicants	<p>Hyams Lane sequential assessment</p> <p>Action Point 54 of ISH3 [EV08-016] requires the applicants to explain how appendix 12A assesses setting where intervisibility is absent, including consideration of approach (kinetic) experience and group value, and, if necessary, to provide a targeted addendum or update to appendix 12A.</p> <p>Historic England's response to the Examining Panel's rule 17 request [AS-081] identifies a sequential, route-based assessment along Hyam's Lane, supported by a narrative</p>	<p>The Applicants have updated Appendix 12A at Deadline 4 with a sequential assessment as requested.</p>

ExQ2	Question to:	Question:	Applicant's Response
		<p>and a sequence of images or visualisations, as a proportionate and appropriate approach.</p> <p>In light of this, can the applicants please confirm whether they will provide such a sequential Hyam's Lane route-based assessment as part of their response to action point 54 by deadline 4. Please also confirm the proposed format of this material (for example, a targeted addendum or revision to appendix 12A, or a standalone note clearly signposted to it), and whether its inclusion would result in any change to the conclusions in ES chapter 12 or appendix 12A.</p>	

APPENDIX 12

LANDSCAPE AND VISUAL

ExQ2	Question to:	Question:	Applicant's Response
12. Landscape and visual			
Q12.0.1	The applicants	<p>Vehicle lights in operational lighting assessment</p> <p>Protect Diseworth queries [REP2-057] whether the on-site lighting (lux/ vertical illuminance) calculations include vehicle lighting.</p> <p>Please confirm whether the operational lighting assessment in ES chapter 11 includes vehicle-generated lighting (for example headlights and reversing lights) in addition to fixed external lighting. If such lighting has been excluded, please explain why this is considered appropriate for the purposes of the assessment and its conclusions, and whether any clarification or supplementary explanation to ES chapter 11 or the supporting calculation outputs is proposed.</p>	<p>The lighting calculations (horizontal and vertical illuminance) does not include vehicle lighting. It is not possible to include vehicle lighting within these calculations for several reasons:</p> <ol style="list-style-type: none"> 1. Vehicle light sources are transient and move around a site, making illuminance predictions of vehicle-generated lighting in any one area of a site impractical and inaccurate. 2. There are no defined luminous intensity (cd) requirements on headlights imposed by UK legislation or regulation. 3. These light sources do not form part of any lighting design. 4. Vehicle light sources are required by law to be used during the night for highways safety purposes. 5. GN01:2021, GN08:2023 and PLG04:2013 the main guidance documents the lighting assessment is based on do not include vehicle light sources for the above reasons. <p>However, mitigation is included within the design of the Proposed Development that will reduce/mitigate the effects of vehicle headlights on the area surrounding the Main Site (specifically those effects on Diseworth). Namely the proposed screen bunding and landscape planting.</p>

ExQ2	Question to:	Question:	Applicant's Response
			<p>Of this mitigation, the most effective and quickest to take effect will be the proposed screen bunding. As per the Construction Phasing Plan provided at Appendix 2 of the CEMP (Document DCO 6.3A) this bunding will be constructed so that it is in place during the construction phase.</p> <p>It should also be noted that:</p> <ol style="list-style-type: none"> 1. The use of high beam headlight is only allowed on unlit roads within the UK 2. It is an offence to use high beam headlights in the UK in built up areas, when there are oncoming vehicles, when following vehicles, or when you are approaching a junction. <p>Therefore, the use of high beam headlight in not permitted within the Proposed Development, and the mitigation that is secured as part of the DCO and within the Construction Phasing Plan provided at Appendix 2 of the CEMP (Document DCO 6.3A) will only be required to mitigate the effects of dipped headlights.</p> <p>Based on the proposed bunding, which is secured as part of the DCO, vehicle headlights will not result in any additional significant effects on any receptors above what is currently assessed within ES Chapter 11 [REP3-016].</p> <p>As such, no clarification or supplementary explanation to ES Chapter 11 or the supporting calculation outputs are required.</p>

APPENDIX 13

MAJOR ACCIDENTS AND DISASTERS AND OTHER SAFETY RISKS

ExQ2	Question to:	Question:	Applicant's Response
13. Major accidents and disasters and other safety risks			
Q13.0.1	EMIA	<p>Aerodrome safeguarding protective provisions</p> <p>The ExP acknowledges EMIA's preference in their submission [REP2-049D] that the applicants should review and revise the community park design pursuant to aerodrome safeguarding. However, for the avoidance of doubt, can EMIA clarify whether securing its preferred set of protective provisions in the dDCO and dMCO would fully address its aerodrome safeguarding concerns, in the event no further review or revision of the community park design was forthcoming from the applicants?</p>	N/A

APPENDIX 14
MATERIALS AND WASTE

ExQ2	Question to:	Question:	Applicant's Response
14. Materials and waste			
The ExP has no further questions on this topic at this time.			N/A

APPENDIX 15

NEED AND ALTERNATIVES

ExQ2	Question to:	Question:	Applicant's Response
15. Need and alternatives			
Q15.0.1	East Midlands Freeport	<p>Extent of designation</p> <p>In its response to the rule 17 letter [REP1-231D], the Ministry of Housing, Communities and Local Government referred to two different boundaries, one of which was rejected as the proposed extent for the Freeport. Could East Midlands Freeport provide us with plans showing the two different boundaries, making clear which relates to which.</p>	N/A
Q15.0.2	The applicants	<p>Associated development</p> <p>The post hearing submission from Prologis [REP1-249D] states it must be demonstrated that each highway intervention qualifies as associated development under section 115 of the PA2008, applying the tests in the relevant guidance. Please can the applicants direct the ExP to where in the application this assessment has been carried out. If it has not been carried out, please update the application accordingly.</p>	<p>Response REP1-249D raises the issue of associated development in the context of the determination of the DCO Application under s104 or section 105 of the Planning Act 2008. That representation also precedes the ExP's Rule 17 letter dated 2 June 2026 [PD-021].</p> <p>The Applicants have provided a detailed written response in its post hearing submissions to ISH3 agenda item 3.1 (DCO 7.14) submitted at Dedline 4. The Applicants responded to the ExP's Rule 17 letter on 10 June confirming that notwithstanding the Applicant's position that a disaggregated approach is not necessary, it is undertaking the exercise requested and will submit the details at Deadline 5.</p>

APPENDIX 16

NOISE AND VIBRATION

ExQ2	Question to:	Question:	Applicant's Response
16. Noise and vibration			
Q16.0.1	The applicants	<p>Construction noise thresholds</p> <p>With reference to the applicants' response to ExQ1 Q16.0.8 [REP1-054], ES chapter 7 paragraph 7.2.12 and table 7.5, and Protect Diseworth's comments [REP2-057], there remains a difference of view regarding how the BS 5228-1 Annex E criteria have been applied in defining LOAEL and SOAEL and in determining significant effects.</p> <p>For the avoidance of doubt, can the applicants please explain:</p> <p>(a) how the threshold values in table 7.5 have been derived from BS 5228-1 Annex E, including whether they correspond to the Annex E example "significant effect" criteria or another interpretation;</p> <p>(b) whether those values have been treated as LOAEL, SOAEL, or another benchmark, and the justification;</p> <p>(c) how the relationship between LOAEL and SOAEL has been established in the assessment, and whether this reflects the Annex E example criteria or a modified approach;</p>	<p>Annex E of BS 5228-1 is informative, as stated within the Annex, it is intended to provide examples only and not an exhaustive set of provisions.</p> <p>The Annex presents different methods of assessing significance of construction noise either through fixed noise limits (Annex E Section E.2 'Potential significance based on fixed noise limits') or based on noise change (Annex E Section E.3 'Potential Significance Based on Noise Change')</p> <p>The threshold values presented in Table 7.5 of ES Chapter 7 [REP3-010], were identified based on the approach outlined in Annex E Section E.2 'Potential significance based on fixed noise limits' not those in Section E.3 'Potential Significance Based on Noise Change' or Table E.1 of the Annex as suggested by Protect Diseworth.</p> <p>The example of fixed noise limits given in Annex E Section E.2 is based on Advisory Leaflet 72 (1976). The thresholds derived for this project in ES Chapter 7, have been based on this approach and thresholds adopted more recently, particularly in relation to large NSIPs such as High Speed 2¹ (HS2) and Northampton Gateway, both of which have noise sensitive receptors in both rural and urban locations.</p>

¹ HS2 Information Paper E23: Control of Construction Noise and Vibration Version 1.7 Last Updated 23rd Feb 2017.

ExQ2	Question to:	Question:	Applicant's Response
		<p>(d) how the assessment has taken account of Annex E Section E.5 for long-duration construction works; and</p> <p>(e) whether this approach affects the identification of likely significant effects reported in ES chapter 7.</p>	<p>The thresholds were based on 75 dB being the SOAEL threshold at which a significant adverse effect is expected during core working hours (07:00 - 19:00 Monday to Friday and Saturdays 07:00 - 16:00 hours). If this level was exceeded for significant periods this could result in widespread disturbance and interference. For works outside of the core hours i.e. weekday evenings a reduction of 10 dB has been applied in line with the guidance in Section E.2 and E.3 of Annex E and a further reduction of 10 dB is applied for the nighttime period (23:00 - 07:00). These SOAEL thresholds also broadly align with the trigger levels for noise insulation (set out in Table E.2 of Annex E). Part of the criteria also includes the period of time that the SOAEL would be exceeded for.</p> <p>The LOAEL thresholds are set at 10 dB below the identified SOAEL values; this is consistent with the approach taken for HS2 and Northampton Gateway and is considered appropriate. In line with government policy on noise, where the LOAEL threshold is exceeded, there is a requirement for reasonable steps to be taken to mitigate and minimise the noise. Therefore, there is an onus for mitigation to be applied when the LOAEL is exceeded.</p> <p>The construction noise assessment has not taken into account the advice in Annex E Section E.5 for 'construction works involving-long term substantial earth moving' because the Applicant disagrees that the works are of such a scale and duration that they fall under the scope of being "more akin to surface mineral extraction than conventional construction activities", the reasons for this are explained below.</p> <p>Regarding the advice in Annex E, Section E.5 suggests (as opposed to mandates) a limit of 55 dB $L_{Aeq,1hr}$ for these types</p>

ExQ2	Question to:	Question:	Applicant's Response
			<p>of activities, where works occur for a period in excess of 6 months. Reference is made to precedent being set in landmark appeal decisions; however, these are not referenced and therefore the context of these cases cannot be understood. Given that the same text was included in the 2009 version of the standard (BS 5228-1:2009), these decisions are likely to have been made prior to the establishment of current noise policy i.e. the Noise Policy Statement for England (2010), the aims of which are reflected in the National Planning Policy Framework and the National Policy Statement for National Networks and is now fundamental to decision making regarding noise.</p> <p>Section E.5 also states that '<i>Other recommendations with regard to noise emissions given in paragraphs 28 to 31 of the Technical Guidance to the National Policy Planning Framework should also be taken into account, where appropriate</i>'. That technical guidance² has since been superseded³ by the Planning Practice Guidance³, and in particular paragraph 022 of the Minerals Guidance⁴ which states that certain operations (such as soil stripping, the construction and removal of mounds and creation of permanent landforms) may give rise to particularly noisy short term activities and increased day time noise limits (of up to 70 dB L_{Aeq,1hr}) should be considered for periods of up to 8 weeks a year to facilitate essential site preparation and construction of mounds, where it is clear this will bring longer term benefits to the site or its environs. Thus, recognising that the types of earthworks activities being undertaken at EMG 2</p>

² Technical Guidance to the National Planning Policy Framework 2012, Department for Communities and Local Government

³ [Planning practice guidance - GOV.UK](#)

⁴ [Minerals - GOV.UK](#)

ExQ2	Question to:	Question:	Applicant's Response
			<p>to create the bund should not be subject to a limit of 55 dB $L_{Aeq,1hr}$.</p> <p>In general, surface mineral extraction tends to occur over long time periods (spanning years or decades), in reasonably fixed locations, exposing receptors to a fairly constant level of noise over a prolonged period, and can therefore be considered to be more of permanent impact than from typical construction activities and therefore lower noise limits are more appropriate. By comparison, as indicated in Appendix 1 and Appendix 2 of the CEMP [REP2-026D] the earthworks associated with the EMG2 application would last for a total of 18 months, which is split into three phases of 6 months which occur in different locations across the site;</p> <ul style="list-style-type: none"> • Phase A - country park and east/north east plateaus. • Phase B - southeast and southwest plateaus and bunding • Phase C - northwest and western plateaus and bunding. <p>The earthworks being undertaken in closest proximity to Diseworth, are the landscaping works associated with the creation of the proposed country park. The ground levels within the country park are proposed to be largely unchanged and the only excavation works would be associated with the ponds, which are at a distance of at least 130m from the nearest receptor, and in most cases 200m or more from the nearest receptors. The excavation associated with the ponds would be comparatively minor compared with the main earthworks activities for EMG2 which involve the creation of the bunds around the western and southern extents of the proposed warehousing (which would occur at a minimum distance of around 130 m from the nearest receptors in Diseworth) and the creation of the development plateaus</p>

ExQ2	Question to:	Question:	Applicant's Response
			<p>(200 m from the closest receptors in Diseworth). Therefore, there would be no large-scale earth moving works within 120 m of the western extent of the red line boundary of the DCO site closest to Diseworth.</p> <p>As indicated in paragraph 7.2.9 and 7.5.24 of ES Chapter 7 [REP3-010], the predicted construction noise levels presented in Table 7.17 are a worst-case relative to each receptor; assuming all the plant listed for that activity is operating in close proximity to the receptor. In practice the construction activity will move around the EMG2 site and the (worst case) predicted noise levels will occur for shorter durations than the length of each phase (6 months). Taking the example of receptor R07;</p> <ul style="list-style-type: none"> • during Phase A, the main earthworks (excluding country park landscaping and pond excavation) would be at least 600 m from R07. At this distance the noise level from the earthworks would reduce by 13 dBA compared to the worst-case location assumed in the calculations. • during Phase B, the works could occur between 130 m to over 1000 m from R07. At 1000 m the noise level from the earthworks would reduce by 18 dBA compared to the worst-case location assumed in the calculations. • during Phase C, the majority of the works would occur between 400 m to over 800 m from R07. At 400 m distance, the noise level would reduce by 10 dBA compared to the worst-case location assumed in the calculations.

ExQ2	Question to:	Question:	Applicant's Response
			<p>As demonstrated above the activities, noise sources, and levels will vary as the works move around the site, limiting the impact on individual receptors during each phase of works.</p> <p>Furthermore, as stated in paragraph 7.5.46 of ES Chapter 7 [REP3-010], the earthworks will be phased to provide screening of the subsequent works where practicable, which would further reduce the noise levels at the receptors in Diseworth. This was not taken into account in any of the predictions of construction noise.</p>
Q16.0.2	The applicants	<p>Construction noise response measures</p> <p>With reference to the applicants' response to ExQ1 Q16.0.9 [REP1-054], which states that specific response measures for exceedances of the thresholds in table 7.5 will be defined within the relevant P-CEMP (secured via requirement 11), further clarification is sought.</p> <p>Please can the applicants explain:</p> <p>(f) what response measures are envisaged where exceedances of the construction noise thresholds are predicted or identified (beyond monitoring and the application of BPM), including how such measures would be triggered, how affected properties would be identified, and how impacts would be managed;</p> <p>(g) whether any Annex E-type consequence measures (for example temporary noise insulation or alternative arrangements for affected receptors) are proposed, and if not, the reason for this; and</p>	<p>f) The P-CEMPs would typically include a Construction Noise Management appendix, which would contain</p> <ul style="list-style-type: none"> • Detailed construction noise assessment for that phase of works, based on information provided by the contractor undertaking; • monitoring arrangements and reporting requirements; • complaint and threshold exceedance investigation procedures; • responsibilities for reviewing monitoring results and determining appropriate responses; • criteria for escalation and implementation of additional mitigation; • stakeholder and community communication procedures; and • arrangements for recording actions taken and demonstrating compliance. <p>If onsite mitigation and BPM have been exhausted but significant adverse effects are either predicted to remain, or identified through complaints or monitoring, the Construction</p>

ExQ2	Question to:	Question:	Applicant's Response
		(h) where these response measures, including the decision-making and trigger mechanisms, would be secured.	<p>Noise Management appendix of the P-CEMP would, set out the trigger thresholds, escalation and review processes.</p> <p>Where appropriate and or necessary (depending on the nature, duration and magnitude of the effects) offsite mitigation measures would be considered. This could include establishing specific respite periods, restricted hours of work or providing access to alternative community facility/quiet spaces during particularly noisy periods and bespoke assistance for certain receptors depending on their sensitivities, and enhanced community engagement).</p> <p>The affected properties would be identified from the construction noise predictions (and the associated noise modelling), as well as any complaints. They would primarily comprise the receptor locations considered in the ES (recognising that these discrete locations are representative of a number of different properties in that vicinity).</p> <p>The management response would be proportionate to the scale, duration and frequency of the exceedance and would seek to reduce noise exposure at source in the first instance.</p> <p>g) The Applicant is not currently proposing a prescriptive Annex E-style compensation or consequence scheme to be secured through the DCO.</p> <p>This is because:</p> <ul style="list-style-type: none"> the assessment concludes that significant effects would be controlled through the application of BPM and the mitigation measures identified in the Environmental Statement and the CEMP;

ExQ2	Question to:	Question:	Applicant's Response
			<ul style="list-style-type: none"> • a flexible management framework secured through the P-CEMP provides a more proportionate mechanism for addressing any unforeseen circumstances. • the nature, duration, location and cause of any exceedance can vary considerably and therefore the appropriateness of receptor-specific measures can only be determined on a case-by-case basis; and <p>Nevertheless, the Applicant confirms that, where predictions, monitoring, and/or investigation demonstrate that a receptor is experiencing unusually high or prolonged construction noise impacts that cannot be adequately reduced through source-control measures alone, consideration will be given to additional offsite site mitigation measures, the nature of which would depend on the circumstances at the time and the .</p> <p>h) Securing of response measures, decision-making and trigger mechanisms</p> <p>The detailed response measures, together with the associated monitoring requirements, investigation procedures, escalation process, decision-making framework and trigger mechanisms, would be secured through the relevant Construction Noise Management appendix to the P-CEMP which is required under Requirement 11 of the draft DCO.</p> <p>This would set out:</p> <ul style="list-style-type: none"> • threshold levels and DCO requirements

ExQ2	Question to:	Question:	Applicant's Response
			<ul style="list-style-type: none"> • detailed construction noise predictions and assessment for that phase of works • monitoring arrangements and reporting requirements; • threshold exceedance investigation procedures; • responsibilities for reviewing monitoring results and determining appropriate responses; • criteria for escalation and implementation of additional mitigation; • stakeholder and community communication procedures; and • arrangements for recording actions taken and demonstrating compliance. <p>The Applicant therefore considers that Requirement 11 provides an appropriate mechanism to secure a proportionate and responsive framework for managing any predicted or identified exceedances of the construction noise thresholds.</p>
Q16.0.3	The applicants	<p>Reversing alarms</p> <p>With reference to the applicants' response to ExQ1 Q16.0.13 [REP1-054], which confirms that tonal reversing alarms were included in the assessment and that any departure from broadband/ white-noise alarms would occur only in "very limited circumstances" for health and safety reasons, and to</p>	<p>(i) The primary function of a reversing alarm is to provide an audible warning to those in the vicinity of the vehicle that it is reversing and caution should be taken. The specific circumstances in which it would be anticipated that a tonal revering alarm may be used is when a third party vehicle (which is outside of the occupiers control in terms of its reversing alarm specification) visits site, and there is an absence of a banksman or an alternative safe system of</p>

ExQ2	Question to:	Question:	Applicant's Response
		<p>Protect Diseworth's comments [REP2-057], further clarification is sought.</p> <p>Please explain:</p> <p>(i) what specific circumstances the applicants consider would necessitate the use of tonal reversing alarms on health and safety grounds, including how such circumstances would be defined, documented and evidenced;</p> <p>(j) how it would be ensured in practice that the use of broadband/ white-noise reversing alarms remains the default across the development, including how any exceptions would be identified, assessed and controlled; and</p> <p>(k) whether the applicants will amend the relevant requirement(s) and/ or management documentation to ensure that:</p> <p style="padding-left: 40px;">broadband/ white-noise alarms are secured as the default position; and</p> <p style="padding-left: 40px;">any exceptions are limited to clearly defined circumstances and subject to a transparent evidential and/or approval mechanism, so that the control is enforceable and consistent with the assumptions underpinning the operational noise assessment.</p>	<p>work, thus preventing the vehicles narrowband reversing alarm from being switched off.</p> <p>(j) Regarding consistency with the assumptions underpinning the operational noise assessment, as confirmed in the response to ExQ1 Q16.0.13 [REP1-054] the source term used for HGV reversing included narrowband (tonal) reversing alarms as a worst case.</p> <p>(k) The Applicants are considering the wording of the requirement and will address this point in the dDCO at Deadline 5.</p>

APPENDIX 17

POPULATION AND HUMAN HEALTH

ExQ2	Question to:	Question:	Applicant's Response
17. Population and Human Health			
The ExP has no further questions on this topic at this time.			N/A

APPENDIX 18

SOCIO-ECONOMIC EFFECTS

ExQ2	Question to:	Question:	Applicant's Response
18. Socio-economic effects			
Q18.0.1	The applicants	<p>Community Development Fund</p> <p>In their response to ExQ1 Q1.2.11 [REP1-054] the applicants indicate that it is proposed to provide a community development fund in the sum of £200,000. The applicants have stated that "it is offered beyond and in addition to any required mitigation or other obligations and is voluntary on the part of the DCO Applicant". Could the applicants explain whether this should have any weight in the planning balance bearing in mind paragraph 4.11 of the NNNPS? Using the same criteria, could the applicants explain what would be necessary to make it "required", in the last sentence of the response.</p>	<p>The DCO Applicant does not expect, or seek, the Community Fund to be given any weight or consideration in the planning balance. Similar funds have been established by Segro at both EMG1 and Northampton Gateway, with both similarly playing no part in the 'planning balance' during the determination of those schemes.</p> <p>As confirmed in the answer given in response to ExQ1 1.2.11, the proposed community fund is beyond and in addition to any required mitigation or other obligations. It is a voluntary act on the part of the DCO Applicant which they wish to implement. The fund is not necessary to render the application 'acceptable' in planning terms and so should play no part in the decision-making process.</p> <p>Our previous response included (as the last sentence): "<i>If required, then the DCO Applicant is agreeable to securing the fund in the dDCO (in accordance with paragraph 35 of Schedule 5 of the Planning Act 2008.</i>" This reference was a pre-emptive offer to secure the Community Fund in the dDCO should the ExP feel this is necessary, or should the LPA require further reassurance of the Applicant's intention to honour this voluntary commitment. The Applicant remains of the view no such formal Requirement or obligation is necessary.</p>
Q18.0.2	East Midlands Freeport	Freeport effects	N/A

ExQ2	Question to:	Question:	Applicant's Response
		<p>In the letter in Annex 3 of the response to the Prologis RR [REP1-051D], Appendix 6] various figures are given as to a comparative 'loss' if only the northern part of the site were to be development in the application made by EMIA and Prologis. In their written representations [REP1-257D] queried these figures. In the 'Applicants' Response to Deadline 1 Submissions' [REP2-032] (see pdf page 238) the applicants indicate these figures were provided by East Midlands Freeport.</p> <p>Could East Midlands Freeport please provide the ExP with confirmation of the figures and how they were derived.</p>	
Q18.0.3	<p>The applicants</p> <p>East Midlands Freeport</p>	<p>20% advanced manufacturing floorspace</p> <p>Paragraphs 7.191 and 7.192 of NWLDC's LIR [REP1-103] recognises the benefit of including a component of advanced manufacturing as part of the proposed development in the interests of socio-economic resilience. Furthermore, East Midlands Freeport in their response to ExQ1 [REP1-227] also recognise the benefits of securing a component of advanced manufacturing floorspace pursuant to the Freeport's objectives and that they would seek to explore the detail with the applicants accordingly.</p> <p>Can the applicants and East Midlands Freeport please clarify whether any discussions have taken place and whether any agreement on the provision of advanced manufacturing floorspace has been reached and clarify how this might be secured in the dDCO?</p> <p>It would also be helpful if the applicants could provide the ExP with two draft requirements on a without prejudice basis:</p>	<p>Discussions have taken place between the Applicants and East Midlands Freeport and the benefits of targeting advanced manufacturing as part of the proposed authorised development are acknowledged and agreed. In order to accommodate this aspiration, the traffic modelling work has assigned 20% of the trips to Class B2 use within the Transport Assessment and the Environmental Statement accompanying the DCO Application.</p> <p>It is the Applicants experience that the best way to maximise take-up by advanced manufacturers is to comprehensively develop and deliver a market leading low-carbon development in a single place, which benefits from excellent road, rail, air and public transport connectivity, has a generous power supply, which presents serviced plots in a fully landscaped environment from the outset; which also benefits from a ready supply of skilled labour and is demonstrably deliverable.</p> <p>The Applicants and the Freeport have therefore discussed and agreed that the correct approach is a requirement to secure a targeted, collaboratively managed and flexible marketing campaign, with consideration from Freeport on</p>

ExQ2	Question to:	Question:	Applicant's Response
		<p>(a) a requirement securing 20% advanced manufacturing floorspace in perpetuity.</p> <p>(b) a requirement securing a targeted marketing strategy, promoting 20% of the DCO scheme's floorspace to prospective advanced manufacturing occupiers, to be submitted and approved by NWLDC, in consultation with East Midlands Freeport. The requirement should also reserve 20% of the DCO scheme's floorspace for advanced manufacturing during the relevant marketing period, only releasing it for storage or distribution uses where it can be clearly evidenced to the satisfaction of NWLDC, in consultation with East Midlands Freeport, that there is insufficient demand from prospective advanced manufacturing occupiers and that this would likely endure over the medium term.</p>	<p>greater targeting of the Tax Site incentives packages to ensure the greatest likelihood of success in securing advanced manufacturing customers to this important Freeport site.</p> <p>On a without prejudice basis, the Applicants propose the following draft requirements:</p> <p>Advanced manufacturing</p> <p><i>20% of the total gross floorspace provided as part of the authorised development shall be for advanced manufacturing use.</i></p> <p>The Applicants note that there is no need for a requirement for any advanced manufacturing use to be in perpetuity. It is not a requirement of the Freeport. Any change of use would be controlled by the local planning authority via a planning application in the usual way.</p> <p>Marketing of the advanced manufacturing floorspace</p> <p><i>(1) 20% of the total gross floorspace provided as part of the authorised development shall be reserved for advanced manufacturing uses for the marketing period.</i></p> <p><i>(2) Save for ancillary buildings, no authorised building on the main site is to be occupied until a strategy has been submitted to and approved by the local planning authority in consultation with East Midlands Freeport for the marketing of the authorised development to advanced manufacturing occupiers. The initial sectors to be targeted will include but will not be limited to</i></p>

ExQ2	Question to:	Question:	Applicant's Response
			<p><i>automotive, aerospace in addition to life science, clean energy, food and drink sector. The strategy will include provision for collaborative working on marketing activity, the review and active management of all enquiries. The approved strategy shall be implemented to the reasonable satisfaction of the local planning authority for the duration of the marketing period.</i></p> <p><i>(3) If on expiration of the marketing period it has not been possible to secure advanced manufacturing uses on 20% of the total gross floorspace provided as part of the authorised development then subject to the local planning authority, in consultation with East Midlands Freeport, confirming that it is satisfied that reasonable efforts have been made to secure advanced manufacturing uses within the authorised development then the restrictions in this requirement shall cease to apply.</i></p> <p><i>(4) In this requirement, the "marketing period" shall mean to the Freeport incentive end date December 2031 as may be varied by agreement.</i></p>
Q18.0.4	The applicants	<p>Modal split</p> <p>Following on from their response to action point 14 [REP1-053] can the applicants please expand on and quantify the extent to which operations at EMG2 would use the SRFI at EMG1 and also expand and quantify the extent to which operations at EMG2 would use the airport. For example, what would be the modal split (road/ rail/ air) for the movement of goods associated with EMG2?</p>	<p>As a result of the close proximity of the airport and rail freight terminal to EMG2, EMG2 provides the opportunity for occupiers to use both facilities. SEGRO, as landlord, is not privy to commercially sensitive information from existing EMG occupiers to quantify the freight that would be transported via the airport or the RFI but are aware that occupiers of EMG1 are utilising both facilities.</p>

ExQ2	Question to:	Question:	Applicant's Response
Q18.0.5	The applicants	<p>Litton (Donington) Ltd</p> <p>With reference to Litton (Donington) Ltd.'s submission [REP1-248D] please can the applicants clarify the extent to which the proposed development would have an effect on any of the existing planning permissions that have been cited.</p>	<p>The EMG2 highway works do not require any land from the site on which Litton (Donington) Ltd have obtained planning permissions for and the highway works associated with those permissions are on the northern side and eastern side of the A453 / A42 Finger Farm Roundabout and there is no direct overlap with the EMG2 highway works. The two sets of highway works are overlaid on the drawing found at Annex 18A.</p> <p>The Applicant's traffic modelling included for the Litton (Donington) Ltd traffic generation (based on the worst case of their permissions). There will be a limited interface to consider regarding highway signage as both schemes will require works to a same set of signs around the junction.</p> <p>Based on the above the Applicant does not consider that EMG2 will have any impact on Litton (Donington) Ltd's development and permissions.</p>
Q18.0.6	The applicants	<p>Employment Scheme</p> <p>Please can the applicants submit the employment scheme that was implemented for EMG1? The ExP is particularly interested in understanding how that scheme ensured employment opportunities were fairly distributed across the study area, and whether the benefits of additional employment opportunities were localised.</p>	<p>The employment scheme that was implemented at EMG had three elements:-</p> <ol style="list-style-type: none"> 1. Initial Construction Phase: (Infrastructure and Enabling Works) (Annex 18B). 2. Construction Phase: (Construction of Buildings) (Annex 18C) 3. Occupational Phase (Annex 18D) <p>The extent to which employment opportunities were distributed across the study area is presented on a plan enclosed at Annex 18E which clearly shows the wide spread</p>

ExQ2	Question to:	Question:	Applicant's Response
			<p>of employment opportunities across the study area by way of employee post code data.</p> <p>SEGRO will build on its experience of EMG1 and create a skills and employment task force made up of key public and private sector organisations that represent the study area. The task force will be responsible for maximising opportunities for local people through the enabling works, construction, and occupational phases of the scheme, helping to breakdown barriers and tackle inequality in local communities.</p> <p>This work will complement SEGRO's Community Investment Plan, which supports local education, employment, and environmental initiatives and is already backed by East Midlands Freeport and Leicestershire County Council. SEGRO is also working with East Midlands Freeport to develop an employability programme with Stephenson College, alongside an environmental initiative in Coalville.</p>
Q18.0.7	The applicants	<p>Cumulative skills shortage</p> <p>In response to Q18.0.14 of ExQ1 [REP1-054] the applicants offered to update the Environmental Statement to include Census 2021 data. Please can the applicants update the Environmental Statement accordingly. Furthermore, the applicants should demonstrate how, even in the worst case JSA scenario, the employment scheme would be capable of upskilling employees to the extent required. It may be helpful to refer to EMG1 and the extent to which upskilling was required there, and how it was secured.</p>	<p>Census 2021 data on unemployment by Occupation has been integrated within the Socio-economics Chapter 5 of the Environmental Statement submitted at Deadline 4. This shows that the spread of labour force by occupation would be sufficient to meet the needs of the EMG2 Project and would cause no shortfall. For the assessment of cumulative impacts, while a shortfall is identified for Professional Occupations this would be anticipated to be mitigated by the Employment Scheme at the EMG2 Projects and by other cumulative developments.</p> <p>Drawing on information provided within Section 5.5 of the Environmental Statement on Baseline Conditions, additional commentary has been provided to highlight that the current analysis considered unemployed residents. Additional</p>

ExQ2	Question to:	Question:	Applicant's Response
			consideration has now been paid to economically inactive residents who want a job and who have the right skillset. The creation of new jobs at the EMG2 Project would provide opportunities to facilitate their return to economic activity, with the support of the Employment Scheme as highlighted in Q18.0.6 above.
Q18.0.8	East Midlands Freeport The applicants NWLDC	<p>Loss of business rates</p> <p>The applicants refer to loss of business rates from the failure to deliver the entire EMG2 site [REP2-032]. Please can the East Midlands Freeport confirm whether the applicants' figures are correct and provide more information on the potential losses.</p> <p>Can these potential losses be calibrated in relative terms to help understand the magnitude of impact? For example, how does £288 million compare to the total value of business rates currently collected within the local authority area, would it be a smaller proportion or a larger proportion?</p>	East Midlands Freeport (EMF) have confirmed that the £188m was their estimate of the loss of EMF Retained Business Rates to 2048 for a partial (200,000 m2) reduction in floorspace at EMG2.

APPENDIX 19

TRAFFIC AND TRANSPORT

ExQ2	Question to:	Question:	Applicant's Response
19. Traffic and Transport			
Q19.0.1	The applicants	<p>Traffic modelling</p> <p>In their response to ExQ1 Q19.0.14 [REP1.054] the applicants refer to the IEMA Guidelines relating to the environmental effects. However, the point of the question was to ascertain the difference of AAWT with AADT and thus identify the traffic for the weekends. By then adding the traffic associated with the proposed development would allow an assessment of the effects at the weekend. While using the AADT may be robust in traffic modelling terms as to whether the network can accommodate the additional traffic, it does not identify the effect on local communities in the weekends when the base traffic is lower.</p> <p>The applicants are asked to undertake the sensitivity analysis set out in question ExQ1 Q19.0.4.</p>	<p>PRTM is a weekday peak hour traffic model. To produce AADT traffic flows AECOM use a factor based on ATC data to determine such information. In theory, it is assumed that such an exercise could be undertaken to determine AAWT flows, and the latter deducted from the former to work out the difference, which could resemble background weekend flows. However, a number of assumptions would have been used to arrive at said numbers which would make the base outputs somewhat questionable,</p> <p>In addition, trip rates included in the TRICS database for employment sites are extremely limited (2 of the 123 surveys in the current database, both on a Saturday); The applicant team cannot recall being asked to consider the impacts of such developments on weekends.</p> <p>As a result, it is not possible to be able to undertake a sensitivity test as requested. However, to hopefully help provide some comfort to the ExP, readily available Automatic Traffic Count (ATC) data for EMG1 and the A453 along the site frontage has been reviewed to compare the recorded traffic flows for a weekday versus a weekend (for the avoidance of doubt no information is readily available on more local roads). The findings are summarised as follows:</p>

ExQ2	Question to:	Question:	Applicant's Response		
			Two-way flows	A453 (site frontage)*	EMG1**
			AADT	17,249	9.979
			Weekend	12,340	5,977
			% of weekend v AADT	72%	60%
			<p data-bbox="1406 651 1841 675"><i>*ATC undertaken for a week from 26/11/2022</i></p> <p data-bbox="1406 715 1841 738"><i>**ATC undertaken for a week from 16/9/2025</i></p> <p data-bbox="1406 778 2128 962">As a result of the above, in summary, there is naturally less traffic on the road network, and there would be less traffic generated by the proposed development, on a weekend. Indeed, there would proportionally less traffic generated by the proposed development than on the roads surrounding the site,</p> <p data-bbox="1406 1002 2128 1321">The AADT assessment included within the ES therefore provides a worst-case assessment in terms of total number of vehicle trips considered in the analysis. The reduction seen above is largely proportional hence if a study area could accurately be determined using AWT data then it is unlikely to be that different. Hence even if a detailed weekend assessment could easily be undertaken, less trips would be taken into consideration, and hence it would be less robust when considering impacts on local amenity already assessed to date, or indeed anything else receptor wise for that matter.</p>		

ExQ2	Question to:	Question:	Applicant's Response
Q19.0.2	LCC National Highways (NH)	<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>Whilst the Applicant notes this question is addressed to LCC and NH, for ease of reference the Applicant's response to the EMIA critique is found in our responses to submissions made by EMIA at Deadlines 2 and 3 (Document DCO 7.13).</p>
Q19.0.3	The applicants	<p>Traffic modelling</p> <p>In the 'PRTM 2023 Sensitivity Test Technical Note and Local Road Network Impact Assessment Note' [REP1-058] there are frequent references to 'average'. Could the applicants please clarify the use of this term, and whether it refers to the 'mode', 'median' or 'mean', identifying individually as necessary, and in each case identify over what time period such 'average' has been taken.</p>	<p>The use of the term 'average' equates to the 'mean' in all instances.</p> <p>The time periods covered are as set out in the associated tables; the VISSIM model AM peak hour of (0730 to 0830 hours) and PM peak hour (1700 to 1800 hours) when discussing VISSIM model findings, and a daily period when considering EIA related Annual Average Daily Traffic related matters in the main text of the report.</p> <p>Three key VISSIM outputs have been reported which includes journey times, queues at junctions, and overall network performance of the highway network. The journey time and network performance results represent mean values recorded across the identified peak hour periods.</p> <p>Two queue metrics have been presented in the report which includes Maximum Queue and Mean Maximum Queue. Queue lengths were recorded at 5-minute intervals throughout the peak periods. The Maximum Queue represents the single highest queue length observed at any point during the peak hour, whilst the Mean Maximum Queue represents the mean of the maximum queue lengths recorded within each 5-minute interval during the peak hour.</p>
Q19.0.4	The applicants	<p>Transport assessment</p>	<p>This reference in the TA will be updated to refer to Junction 8 instead. The reference in paragraph 4.40 will be reviewed</p>

ExQ2	Question to:	Question:	Applicant's Response
		<p>Paragraph 12.1 of the TA [REP1-031] refers to three junctions, the last, A453/ The Green being designated as "Junction 7". However, on page 41 this is entitled "Junction 8". Could this be corrected, and the applicants check the document to ensure that there are no other similar errors.</p>	<p>also. The Applicants will submit the updated TA at Deadline 5.</p>
Q19.0.5	The applicants	<p>Potential mitigation</p> <p>In its D3 submission [REP3-058] LCC notes increases in traffic on the former A6 Derby Road, Kegworth and through the centre of the village of Castle Donington. The applicants are asked to explain its response to this comment in light of paragraph 5.283 of the NNNPS.</p>	<p>The Applicant is of the view that these potential impacts are not likely because the assessment within the PRTM 2023 sensitivity test report assumed a conservative worst-case scenario without having any benefit of the Travel Plan measures. This is not realistic based on the observed traffic data and travel patterns at EMG1 (Transport Assessment Document 6.6A [REP1-031]), which confirms that actual surveyed trip rates at EMG1 are considerably lower. It therefore provides a very much robust, worse than worst-case, assessment.</p> <p>Given the above, the Applicant considers that no mitigation is necessary (and para 5.283 is not relevant to these locations); however, LCC consider that the situation should be addressed the DCO Applicant is prepared to do so provided that it can be undertaken in a proportionate way. To this extent the Applicant is in the process of discussing potential measures with LCC,</p>
Q19.0.6	The applicants	<p>Local directional signage</p> <p>In response to ExQ1 Q19.0.5 [REP1-054] the applicant referred the ExP to article 18 of the dDCO [REP2-008D]. However, this only allows for additional signage, it does not mandate it when necessary.</p> <p>Given the changes in traffic identified in the 'PRTM 2023 Sensitivity Test Technical Note and Local Road Network Impact Assessment Note' [REP1-058] on the former A6</p>	<p>As discussed at Q19.0.5 above the Applicants are in discussions with LCC regarding potential measures. If these measures include additional signage then the Applicants will propose a Requirement to secure the works.</p>

ExQ2	Question to:	Question:	Applicant's Response
		<p>Derby Road, Kegworth and through the centre of the village of Castle Donington, and the comments from LCC in its D3 submission [REP3-058], the applicants are asked either to come forward with specific proposals, which should be secured, or to include a mechanism so that the local highway authority can require additional signage if, at its absolute discretion, it considers it necessary.</p>	
Q19.0.7	The applicants	<p>Road Safety Audit</p> <p>It is noted in paragraph 1.8 of the Road Safety Audit [REP1-056] that it is stated that no details of the structure of the bridge providing the link from the M1 to the A50 have been supplied meaning that the bridge has not been the subject of an audit.</p> <p>Could the applicants please ensure that an audit of the structure of the bridge is carried out, and any modifications considered.</p>	<p>The Audit Brief is found at Annex 19A together with copies of correspondence from NH and LCC confirming its approval.</p> <p>The Applicants' responses to Deadline 2 and 3 submissions by EMA (Document DCO 7.13) provides the Applicants' response to this issue and confirms compliance with the relevant DMRB standard - that being GG 119 "Road Safety Audit" (a copy of Appendix B of this standard is provided at Annex I of Document DCO 7.13).</p> <p>Notwithstanding this position the Applicants have asked the Audit Team to review the A453 Bridge Plan (Document DCO 2.11 [APP-053D]) and a copy of their response is found at Annex 19B. This confirms that the Audit findings would not have been different had this plan been provided.</p>
Q19.0.8	The applicants	<p>Road Safety Audit</p> <p>In discussing the proposed crossing at EMA signal controlled crossing, the applicants indicate that this was considered by those undertaking the Road Safety Audit [REP1-056]. However, this is not referred to by that report. To ensure that this has occurred, could the applicants please provide a copy of the brief, and a short statement from the auditors confirming that they considered this junction and outlining their response.</p>	<p>Prior to receipt of this question, the Applicant had requested this statement and a copy is enclosed at Annex 19C.</p> <p>Notwithstanding this, for the reasons set out in the Applicants' responses to Deadline 2 and 3 submissions by LCC (Document DCO 7.13) the Applicants have agreed to provide a controlled crossing.</p>

ExQ2	Question to:	Question:	Applicant's Response
Q19.0.9	The applicants	<p>Construction traffic</p> <p>Given the discussions at ISH3 regarding the nature of operations of the EMA, the applicants are asked to consider enlarging the Construction Traffic Management to ensure that it takes account not only of traffic travelling to and from the airport, but also other large scale events such as those taking place at the Donnington Park track site.</p>	This has been taken into consideration in the revised CTMP submitted at Deadline 4
Q19.0.10	NH LCC	<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>	N/A
Q19.0.11	The applicants NH	<p>Joint Statement on Strategic Highway Works</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?</p>	The Applicants will arrange for the final version of the Joint Statement on Strategic Highways Works to be appended to the SoCG.

ExQ2	Question to:	Question:	Applicant's Response
		Can, in due course, the final version either be signed on behalf of both parties, or appended within the relevant Statement of Common Ground?	
Q19.0.12	NH LCC NWLDC Prologis/ EMIA	<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 example, for the joint application, at this stage we identified what, if any, highway and transport mitigation works might be necessary.</p>	<p>Whilst the Applicants note this question is addressed to others, we would draw the ExP's attention to the Isley Woodhouse Transport Assessment [REP1-179] which includes works at Finger Farm as set out at paragraphs 15.14 and 15.15 of that TA. This is in effect the 'purple package'.</p> <p>The Applicants note that this is not compatible with the mitigation proposed as part of the Joint Application for this junction a copy of which is found at Annex 19D. This is extracted from the most recent (May 2025) Transport Assessment submitted to NWLDC for the Joint Application.</p>
Q19.0.13	The applicants NWLDC	<p>'Fly-parking' of HGVs</p> <p>In discussing the lorry park in the LIR [REP1-103] in paragraph 7.154 NWLDC states it "welcomes the delivery of the lorry park, the impact is considered to be neutral given that it would only meet the needs of the developments and consequently is neither exacerbating nor improving the existing situation". The ExP's understanding is that on-plot HGV parking for the individual unit would be to meet LCC's standards and thus the parking would be in addition to that required by the development. Could the applicants please confirm the proposals in this regard and under what arrangements would drivers be allowed to park on site?</p> <p>Could NWLDC please provide any evidence it has of 'fly-parking' of HGVs in the vicinity, and how and why this information was secured.</p>	<p>On-plot HGV parking will be provided to LCC's standards. However, it is commonplace within the logistics industry for HGVs to arrive earlier than required by the warehouse (due to the long distances travelled likely including use of a ferry or the channel tunnel). When arriving early, drivers require somewhere to park and this is the purpose of the HGV park which would be available for use by HGVs serving any of the occupiers within EMG2. This provision ensures that any existing 'fly-parking' by HGVs would not be increased by EMG2. The HGV parking will be a secure area monitored via CCTV and the onsite 24hr security team.</p>

ExQ2	Question to:	Question:	Applicant's Response
Q19.0.14	The applicants	<p>HGV parking demand</p> <p>NWLDC in its LIR [REP1-103] paragraph 7.152 states that the "applicants [indicate] that the National Highways 'Lorry Parking Demand Assessment' (2024) ('NH LPDA') establishes that [North West Leicestershire] has the most severe lorry parking issues of local authorities in England". Could the applicants please provide this assessment into the examination.</p>	<p>The NH LPDA is provided as requested at Annex 19E. Please note that whilst the cover of the report states September 2023, it was last updated in July 2024 (see revision box on page 2). (The second) Appendix A of this document lists all local authorities with scoring above 12 and, as can be seen, North West Leicestershire has the highest score.</p>
Q19.0.15	The applicants	<p>Transport Assessment – Bus Services</p> <p>Paragraphs 5.21 to 5.23 and tables 15 and 16 in the TA [AS-032] set out the existing bus services in the vicinity. Could an additional column be included setting out the hours of operation (earliest and latest, or 24 hour).</p> <p>As the site would be likely be operating shift pattern changes, could the applicants set out, the frequency for 'off peak' services (those around 0600 hours and 2200 hours).</p>	<p>The Applicant considers that the tables referenced by the ExA should refer to Tables 7 and 8 of the Transport Assessment [REP1-031], (not AS-032) not Table 15 and 16.</p> <p>In this respect, the additional data requested by the ExA to supplement Tables 7 and 8 of the Transport Assessment [REP1-031] is provided as Annex 19F of this response. These tables show additional information in blue for ease.</p>
Q19.0.16	The applicants	<p>Transport Assessment – Rail/ Bus Services</p> <p>It is not clear from Figure 15 in the TA [AS-032] as to whether the Skyline Express includes a stop at East Midlands Parkway station. Could the applicants please clarify the situation and explain what approach it has taken to linking the Parkway station with the application site as a way of promoting sustainable transport choices.</p>	<p>The Applicant would clarify that Figure 15 of the Transport Assessment [REP1-031] does not show a stop at East Midlands Parkway (EMP) for the skylink Express, as there is currently no direct fixed-route bus service linking EMP with the application site. Access to EMP is however provided via the Nottsbus On Demand service. This service offers a flexible, pre-booked connection between EMP, EMG1, East Midlands Airport (EMA) and the proposed EMG2 site.</p> <p>The Applicant has taken an evidence-led approach to considering the provision of a dedicated EMP connection. Employee travel survey data at EMG1 (2019 to 2024) indicates very limited use of rail, despite the availability of flexible bus services. While a direct bus service could</p>

ExQ2	Question to:	Question:	Applicant's Response
			<p>potentially support a limited increase in rail use, the Sustainable Transport Strategy (STS) (APP-084) identifies that further analysis of demand and commercial viability would be required before prioritising investment.</p> <p>The STS notes that a direct fixed-route connection between EMP, EMG1, EMG2 and EMA has been considered by stakeholders as a potential enhancement; however, it also highlights that this should be considered alongside wider redevelopment in the Freeport area (e.g. Ratcliffe-on-Soar redevelopment), which alongside EMG and EMA could make the viability of the a dedicated bus link to the EMP viable.</p> <p>The Applicant would summarise that a direct EMP link is currently not being progressed noting that evidence from EMG1 shows that rail demand is very limited and that demand responsive bus options exist. On balance it is considered a direct EMP link does not currently represent an effective use of funding.</p> <p>Notwithstanding, a future direct EMP link has not been discounted, but would need to be considered in the future by the Sustainable Transport Working Group (STWG). The STWG would be informed by the latest monitoring data as well having greater clarity on the proposals in the Freeport area. Any future investment decisions would be made by the STWG against the agreed investment criteria to determine whether such a service represents the most effective use of funding.</p>
Q19.0.17	The applicants	<p>Transport Assessment – effects in local settlements</p> <p>In paragraph 12.33 the applicants have set out increases in traffic in 5 locations in the a.m. and p.m. peak hours.</p>	<p>This is provided as Annex 19G of this response. The Applicant will also arrange for this to be incorporated into the revised version of the TA to be submitted at Deadline 5.</p>

ExQ2	Question to:	Question:	Applicant's Response
		<p>Could this please be set out as a table, additionally including the base flows, the 'without development' (in 2028 and 2038) and the percentage changes.</p>	
Q19.0.18	NH	<p>Joint Application Mitigation Package</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>	N/A

APPENDIX 20

UTILITIES

ExQ2	Question to:	Question:	Applicant's Response
20. Utilities			
Q20.0.1	The applicants Cadent Gas Networks	<p>Gas supply capacity and reinforcement</p> <p>ExQ1 Q20.0.3 sought a response from Cadent Gas Networks, but no response has been received. The applicants' response [REP1-054] states that available capacity cannot be confirmed until a formal GT1 submission is made and that any reinforcement or diversionary works position therefore remains unconfirmed.</p> <p>Please confirm, based on the information currently available, whether reinforcement is likely to be required to supply EMG2 and, if so, the likely nature and extent of any reinforcement. The applicants are also requested to provide a brief status update on (i) whether and when a GT1 submission would be made and (ii) whether appendix 16A should be updated, as indicated in the ExQ1 response, to reflect the current position.</p>	The Applicants' previous response under REP1-054 remains accurate because until a formal GT1 submission is made, Cadent will not formally confirm if the capacity identified to serve the development will be available in their local network or if reinforcement works will be required.
Q20.0.2	The applicants Joint Radio Company National Grid Electricity Distribution	<p>Microwave/ radio link infrastructure</p> <p>ExQ1 20.0.5 sought responses from Joint Radio Company and National Grid Electricity Distribution on microwave and radio link constraints and mitigation, but no response has been received. The applicants' response [REP1-054] indicates that only a desktop assessment has been undertaken to date and that the detailed mitigation solution remains subject to further line-of-sight survey work and agreement. Please confirm, based on the information</p>	<p>Utility Connections received a response from National Grid Telecoms Ltd on the 01/04/2026 providing costs for an EAD connection between the Pegasus Business Park and Bondwood Radio facility which once connected removes the requirement for the line of site arrangement.</p> <p>These works can be scheduled in advance of any onsite construction works and once works are completed National</p>

ExQ2	Question to:	Question:	Applicant's Response
		<p>currently available, the likely mitigation approach required to protect affected radio links (for example safeguarding clearances or easements, relocation parameters and timing) and whether this is agreed in principle. The applicants are also requested to provide a brief status update on (i) engagement undertaken with the Joint Radio Company and NGED since ExQ1, (ii) whether and when further survey or assessment will be carried out and (iii) how and where the required mitigation will be secured in the application documents, or what further submission will be provided to evidence the agreed mitigation and its securing mechanism.</p>	<p>Grid Telecoms Ltd should then remove any objections that may have been raised.</p>

APPENDIX 21

WATER ENVIRONMENT

ExQ2	Question to:	Question:	Applicant's Response
21. Water Environment			
Q21.0.1	LCC	<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>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?</p> <p>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)</p>	N/A

ExQ2	Question to:	Question:	Applicant's Response
		would be transferred to the relevant third party and that there would be no gaps in monitoring and remediation jurisdiction?	
Q21.0.2	The applicants	<p>Overland exceedance flows and use of weirs</p> <p>In response [REP1-051D] to Protect Diseworth on the routing of overland exceedance flows, the applicants set out that weirs would direct such flows to avoid sensitive receptors. Please can the applicants provide further information about the proposed use of weirs, and how their design and implementation to mitigate overland exceedance flows would be secured in the dDCO?</p>	<p>An illustrative section through the flow control chamber has been prepared as requested and is enclosed at Annex 21A. This shows the flow control device in the base of the chamber managing the rate of surface water discharge up to the 1 in 100-yr+25/40% events. A weir is present above the control structure that allows water to bypass the restriction in larger events, and enter the downstream system for conveyance towards the outfall.</p> <p>Agreement of the final drainage strategy is secured in Requirement 17.</p>
Q21.0.3	The applicants STW	<p>Foul drainage capacity</p> <p>Please can STW clarify that the required upgrades would be deliverable and the flows from EMG2 could be accommodated as a matter of principle, that there are no systemwide constraints that would cast doubt over the likelihood of this being achieved and that no prior feasibility work is required in this respect?</p> <p>Please can the applicants review the dDCO [REP2-008D] to ensure that there are adequate provisions preventing the occupation of the proposed development before the required upgrades are completed.</p> <p>The ExP notes that requirement 18 deals with foul water drainage, and queries whether this could be updated to incorporate the pre-occupation provisions. Furthermore, should STW also be a consultee for the pre-commencement foul water drainage strategy?</p>	<p>Requirement 18 is currently written to require the foul drainage strategy to be agreed with the LPA prior to commencement of the development, the Environment Agency have also been named in the Requirement at their request. It is understood that the LPA can choose who they consult to inform their decision on the agreement – including Severn Trent Water. If necessary, the foul water drainage strategy could include an infrastructure delivery programme linked to occupation dates, to ensure that any necessary upgrades to the downstream foul network are implemented ahead of occupation of a specific phase. If the strategy is not agreed, then the construction of the development, excluding earthworks, archaeological investigation or ecological mitigation works, cannot commence or be occupied.</p>

APPENDIX 22

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN (CEMP) [REP2-026D]

ExQ2	Question to:	Question:	Applicant's Response
22. Construction Environmental Management Plan (CEMP) [REP2-026D]			
Q22.0.1	The applicants	<p>CEMP</p> <p>In its LIR [REP1-103] NWLDC suggest that, apart from Works 7a and 7b, all construction activity should be accessed from the A453. The applicants are asked to consider ensuring this, apart from Work 19, is secured within the CEMP.</p>	<p>The Applicant is unable to locate such a suggestion in the LIR submitted by NWLDC (nor in the LIR from LCC), but assumes this is related to the Main Site and the query raised at paragraph 7.12 of the NWLDC LIR [REP1-103]. If that assumption is incorrect, the Applicant would request further clarification identifying where this specific suggestion was made and the Applicant will respond appropriately.</p> <p>The CEMP (and associated Construction Traffic Management Plan, CTMP) is clear (at paragraph 4.8) that a suitable construction access will be provided from the A453 for the numerous Works located on the EMG2 Main Site. The exception in terms of defined Works are Works 7a and 7b (to Hyams Lane) where it is likely construction access will be provided from within the Main Site (without a specific new construction access from the A453 to those parts of the site).</p> <p>Details of construction access is to be provided in future phase specific CEMPs, as required by paragraph 22.1 of the CEMP, and as referred to in the CTMP which is an Appendix of it and which has been updated and strengthened in this regard (at paragraph 4.1). Naturally where Works packages are remote from the EMG2 Main Site and from the A453, such as Works 10 and 11 on the A50, and Works 16 on the M1, as well as Works 19 (Castle Donington PROW link) alternative construction accesses will be required.</p>

ExQ2	Question to:	Question:	Applicant's Response
Q22.0.2	The applicants	<p>Construction Traffic Management Plan</p> <p>In response to ExQ1 19.0.28 [REP1-054] in dealing with breaches of the traffic volume thresholds it is stated "Where there are more than three breaches within a two-week period, the monitoring data will be provided to National Highways and a meeting convened within one week to agree mitigation actions and next steps." However, this does not deal with the situation should mitigations not be agreed expeditiously or set a timetable for any agreed mitigations to take place or should further breaches occur. The applicants' are asked to amend the Construction Traffic Management Plan to deal with all these eventualities.</p>	<p>The CTMP has been amended in response to this question and re-submitted at Deadline 4. The CTMP is included as Appendix 2 to the CEMP DCO 6.3A.</p>

APPENDIX 23

EXP IDENTIFIED OUTSTANDING APPLICANTS' COMMITMENTS

ExQ1 question number	Topic area	Applicants' response	Outstanding matter(s)	Applicants' Response
Q1.2.5	Parameters Plan	<p>A copy of the Parameters Plan Key Layout relating to the EMG1 DCO is at Annexure 1B of this document.</p> <p>Plot 16 (comprising MCO Works Nos. 3A and 6A as described in dMCO [APP-015M]) was shown on the parameters plans for the EMG1 DCO as "landscape open space including landscape screen bunding". However, the land was only seeded, no bunding was provided. The works relating to Plot 16 will affect those parts of the EMG1 DCO works comprising the lower part of the southeast facing screen bunding but will not affect the overall height of the bunding or its function as mitigation to the village of Lockington and surrounding area.</p> <p>The proposed sub-station extension (comprising DCO Works No. 20 as described in dDCO [APP-012D]) is partly within the area shown on the original EMG1 DCO parameters plan as "landscape open space including landscape screen bunding" and partly within "Zone A development areas",</p>	<p>Parameters Plan, as provided, does not identify the locations of Site 16 or the sub-station. The "landscape open space including landscape screen bunding" description covers a wide area to the north (and to a lesser extent, the south) of the Zones, but there is no indication of the location of Plot 16 or the sub-station within this area.</p>	<p>The Parameters Plan at Annexure 1B of REP1-054 is the parameters plan for the original EMG1 DCO. It does not delineate the location of plot 16 nor the substation. The Applicants have therefore provided a textual description in its response to ExQ1.2.5.</p> <p>The location of Plot 16 is shown on the MCO Parameters Plan REP1-013M.</p> <p>The location of the substation is shown on the DCO Parameters Plan AS-006D.</p>

		<p>specifically Zone 6. However, the land was only seeded, no bunding was provided. The EMG1 DCO, at Part 4 of Schedule 1 under “Further works” paragraph (2)(d) included for “primary ... substations” within any of Works Nos. 1 to 6 and 9. The landscaping open space and Zone A development area are Work Nos. 3 and 6 respectively.</p> <p>In the event, however, no landscaping works were undertaken to the land and consequently no replacement mitigation is required.</p>		
Q3.0.5	Cumulative effects on BMV land	The Applicants are preparing a technical note that will be submitted at Deadline 2.	No technical note has been submitted to date	The Applicants technical note is enclosed at Annex 3A .
Q4.0.4	Consistently describing modelling stages/ scenarios and using plain English	<p>The Applicants note that definitions are not provided in Chapter 8 of the ES [AS-037] for ‘demand flow’, ‘actual flow’ and ‘green package’. The terms mean:</p> <ul style="list-style-type: none"> • Demand flow refers to the traffic that wishes to travel through a highway network. • Actual flow refers to traffic which is realized on the highway network. This may differ from ‘demand flow’ for reasons such as capacity constraints. • Green package refers to the EMG2 Project Mitigation proposals (and new link from the M1 south to A50 	<p>Para 8.2.60 of the ES Chapter 8 submitted at Deadline 3 [REP3-012]. Confirms that the ES has not yet been updated.</p>	<p>The Applicants have reviewed the wording within Chapter 8 and identified that the confusion on this point is related to the re-numbering of the Paragraph numbers between the January 2026 submission of the ES Chapter 8 [AS-037] and the ES Chapter 8 submitted at Deadline 3 [REP3-012]. Due to amendments made previously in Section 8.2:</p> <ul style="list-style-type: none"> • Para 8.2.58 [AS-037] became Para 8.2.60 in [REP3-012]; • Para 8.2.60 [AS-037] became Para 8.2.62 in [REP3-012].

		<p>in particular) when considered with the wider Growth Point mitigation aspirations.</p> <p>It should be noted that the reason for using ‘demand flow’ rather than ‘actual flow’ when considering construction traffic is since the construction traffic contribution to the highway network is relatively low, and hence model ‘noise’ can mask the construction traffic impacts.</p> <p>Chapter 8 of the ES can be updated to include these definitions if required.</p> <p>With regards to inconsistencies in references to stages / scenarios:</p> <ul style="list-style-type: none"> • Paragraph 8.2.58 states which scenarios were modelled for the EMG2 Project Operational Phase; no further clarification has been requested of this, and, on review, it is considered that the Chapter is clear in what is set out. • Paragraph 8.2.60 states which scenarios were modelled for the Construction Phase. However, it should be noted that, on review, there is a typographical error which may be misleading the reader. <p>The bullet points in Paragraph 8.2.60 should read:</p>		<p>To note, Para 8.2.60 in [REP3-012] relates to Operational traffic scenarios, while Para 8.2.62 in [REP3-012] relates to construction traffic scenarios. Both were amended between [AS-037] and [REP3-012] to provide additional clarity and be consistent, as requested. However, the applicant’s response to the ExP’s first round of written questions referred to the Paragraph numbers incorrectly, or, more specifically, in the order they were in in [AS-037].</p> <p>In order to avoid further confusion on this point, the following can be confirmed.</p> <p>Scenarios modelled for the EMG2 Project Operational Phase are set out in Paragraph 8.2.60 of [REP3-012] and are:</p> <ul style="list-style-type: none"> • “<i>Stage 1a 2028 forecast year without the EMG2 Project (with all Freeport and Local Plan sites)</i>” v “<i>Stage 2 2028 forecast year with the EMG2 Project, with mitigation (green package) (with Local Plan sites)</i>” • “<i>Stage 1b 2028 forecast year without the EMG2 Project (without Local Plan sites)</i>” v “<i>Stage 2 2028 forecast year with the EMG2 Project, with mitigation (green package) (without Local Plan sites)</i>”
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		<ul style="list-style-type: none"> • 2028 Stage 1a v 2028 Stage 1a + Construction Traffic (i.e. with all Freeport and Local Plan sites) – Demand Flow • 2028 Stage 1b v 2028 Stage 1b + Construction Traffic (i.e. without Local Plan Sites) – Demand Flow <p>This may be causing the majority of confusion when reviewing the naming conventions.</p> <p>Notwithstanding the above, it is noted that the above does not match exactly with the naming conventions used in Paragraph 8.2.55. Therefore, for additional clarity, the following scenarios were compared:</p> <ul style="list-style-type: none"> • Stage 1a Modelling 2028 forecast year (demand flow) (with all Freeport and Local Plan sites) • 2028 forecast year (demand flow) with construction traffic (with all Freeport and Local Plan sites) • Stage 1b Modelling: 2028 forecast year (demand flow) (without Local Plan sites) • 2028 forecast year (demand flow) with construction traffic <p>Chapter 8 of the ES and relevant appendices are being reviewed and will</p>		<p>Scenarios modelled for the EMG2 Project Construction Phase are set out in Paragraph 8.2.62 of [REP3-012] and are:</p> <ul style="list-style-type: none"> • “<i>Stage 1a 2028 forecast year (demand flow) (with all Freeport and Local Plan sites)</i>” v “<i>Stage 1a 2028 forecast year (demand flow) with construction traffic (with all Freeport and Local Plan sites)</i>” • “<i>Stage 1b 2028 forecast year (demand flow) (without Local Plan sites)</i>” v “<i>Stage 1b 2028 forecast year (demand flow) with construction traffic (without Local Plan sites)</i>” <p>The Applicants consider that with the additional clarity provided above, no further updates to the Chapter are necessary.</p>
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		be updated where necessary and will then be resubmitted.		
Q4.0.5	Baseline pollutant concentrations	Chapter 8 of the ES [AS-037] is being updated and will be resubmitted at Deadline 3.	Para 8.2.60 of the ES update at Deadline 3 (see above comment). It is different to the January 2026 text, but is not the same as that noted in the applicant's response to Q4.0.4 (bold text)	Q4.0.5 of the Exp's first round of written questions is not related to Q4.0.4, nor relevant to Para 8.2.60 of the ES Update at Deadline 3 (which relates to the operational phase scenarios discussed above in relation to Q4.0.4). The changes requested in Q4.0.5 related to the baseline pollutant concentrations (Table 8.8 to Table 8.12) which have already been actioned.
Q4.0.8	Non-Road mobile machinery	The Applicants confirm that the CEMP, in respect of the DCO Scheme, the CEMP [APP-206D] will be updated to secure this. The CEMP relating to EMG1 DCO already includes appropriate controls and measures, and has been operating successfully during construction of EMG1.	Does not answer the question of whether the dDCO will secure NRMM limits as it refers to the CEMP. The CEMP [REP2-026D] includes section 8 Control of Emissions from Non-Road Mobile Machinery (NRMM). The dDCO [REP2-008D] includes a Part 1 requirement for a phase specific CEMP to be approved in writing based on the CEMP.	Section 8 of the CEMP does secure controls over NRMM with direct reference to the ' <i>Cleaner Construction for London (CCfL) and Mayor of London (2024) Non-Road Mobile Machinery (NRMM) Practical Guide v.669</i> ' and to the potential retrofitted solutions to mitigate emissions from NRMM set out by the Energy Saving Trust, both of which are also cited in ES Chapter 8. Future phase-CEMPs will be required to comply with the CEMP in this regard, including in terms of the location and use of such equipment.
Q4.0.16	Model verification preamble	The Applicants confirm that four of the five local authorities where monitoring data was used for the verification processes have now released a 2025 Air Quality Annual Status Report, containing 2024 data. Erewash Borough Council	It is not clear that the preamble/introduction to Appendix 8A has been updated to provide the clarity requested at Deadline 3 [REP3-033].	Additional preamble text was added beneath Table 8a.1 to provide more detail regarding model verification methodology. No text was added to confirm whether the 2023 data was the latest as this position is constantly changing. For example, the Applicants

		<p>have yet to release a report containing 2024 data.</p> <p>Appendix 8A [APP-098] will be updated to provide clarification and will be submitted at Deadline 3.</p>		<p>note that Erewash have now released a 2025 Air Quality ASR containing 2024 data.</p> <p>Despite the release of new monitoring data for all local authorities considered as part of the verification process, the modelling assessments undertaken are still deemed appropriate and robust to assess the impacts and in determining significance.</p>
Q5.0.11	Pre-construction species surveys	<p>The Applicants confirm that pre-construction surveys are necessary in relation to specific species rather than as a general blanket measure. The pre-construction survey requirements are set out in the CEMP for the DCO Scheme and will be detailed further within each P-CEMP. For the MCO Scheme, the construction management framework plan will inform the CEMP which will provide for preconstruction surveys.</p>	<p>This does not answer the question of whether surveys will be secured in the dDCO and dMCO. The CEMP is secured in the dDCO as a Part 1 requirement, but not the dMCO (as at Deadline 2).</p> <p>To date a Construction Management Framework Plan has not been submitted.</p>	<p>The Applicants note that the ExP's comments are directed to the MCO Application.</p> <p>The Construction Management Framework was submitted as part of the approved EMG1 DCO. Requirement 11 of the EMG1 DCO (shown in REP2-018M) requires a CEMP (equivalent to a P-CEMP in the DCO) to be submitted to and approved in writing by the local planning authority before work can commence.</p>
Q5.0.25	Securing compliance with protected species reports	<p>The Applicants confirm that the dDCO [PDA-004D] (since updated to [REP2-008D]) and dMCO [PDA-006M] (since updated to [REP2-010M]) will be updated to secure compliance with the reports.</p>	<p>The applicants' response does not set a timeframe for updating the dDCO and dMCO.</p> <p>Protected Species Licences and letters of no impediment [APP-119] reference badgers and bats. Bats require mitigation from artificial lighting [APP-110], and the badger report [APP-109] is confidential.</p>	<p>The Applicants are reviewing the comments to ensure they are addressed and, where necessary, are incorporating into the update to the dDCO and dMCO which will be submitted at Deadline 5.</p>

			<p>Authorised development must be carried out in accordance with the LEMP.</p> <p>The draft LEMP [REP3-043] provided at Deadline 3 references faunal enhancements for bats and badgers.</p> <p>There is no reference to species reports in the dDCO provided at Deadline 2 [REP2-008D] or the dMCO [REP2-010M], only references to ecological reports in the dDCO.</p>	
Q5.0.27	Detailed design and delivery of ecological mitigation outside of the EMG2 main site	<p>The Applicants confirm that the dDCO [PDA-004D] (since updated to [REP2-008D]) will be updated to ensure that ecological mitigation outside the main site is secured as appropriate.</p> <p>As regards the Community Park, article 7(2) and 9(2) of the dDCO will be updated to include reference to it.</p>	<p>There is no time commitment from the applicant on when the dDCO will be updated so the dDCO update submitted at Deadline 2 [REP2-008D] was reviewed.</p> <p>Requirement 7(2) references "authorised development on the main site or community park", but requirement 9(1) does not.</p> <p>Requirement 9(2) referenced by the applicant in its response to ExQ1 does not contain reference to either the main site or community park.</p> <p>The track changed version of the dDCO at Deadline 2 [REP2-009D] shows only non-substantive changes have made to Schedule 13.</p>	The Applicants are reviewing the comments to ensure they are addressed and, where necessary, are incorporating into the update to the dDCO and dMCO which will be submitted at Deadline 5.

Q6.0.4	Mitigating greenhouse gas emissions	Whilst the measures are secured in the Commitments Register relating to the DCO and MCO [APP-226D and APP-227M], the Applicants are content to update the dDCO [PDA-004D] (since updated to [REP2-008D]) and the dMCO [PDA-006M] (since updated to [REP2-010M]) to secure these items and to be resubmitted at Deadline 2.	The EXP has been unable to locate any reference to carbon management (other than the site being carbon neutral), greenhouse gas, or energy using a word search on the Deadline 2 dDCO [REP2-008D].	The Applicants are reviewing the comments to ensure they are addressed and, where necessary, are incorporating into the update to the dDCO and dMCO which will be submitted at Deadline 5.
Q15.0.4	Calculation errors	The calculation in the footnote should be amended to: $(2.21-1)*(1-0.18)+1$	The footnote has not been updated.	The footnote has been updated in the revision to Chapter 5 submitted at Deadline 4.
Q17.0.2	Complaints monitoring	The Applicants confirm that the dDCO [PDA-004D] (since updated to [REP2-008D]) will be updated to provide a mechanism to deal with complaints which is consistent with the EMG1 DCO.	Relevant text included under requirements for construction noise and noise during the operational phase. However, it does not state that any recommended remedial measures shall be implemented, who whom, in what timescales.	The Applicants are reviewing the comments to ensure they are addressed and, where necessary, are incorporating into the update to the dDCO and dMCO which will be submitted at Deadline 5.

APPENDIX 24

ABBREVIATIONS

Abbreviations used

AADT	Annual Average Daily Traffic
AAWT	Annual Average Weekday Traffic
ALARP	As Low As Reasonably Practicable
ALC	Agricultural Land Classification
Applicant/ Applicants	SEGRO Properties Limited and/ or SEGRO (EMG) Limited
BMV	Best and Most Versatile
BS	British Standard
BSP	Bulk Supply Point
CEMP	Construction Environment Management Plan
CTMP	Construction Traffic Management Plan
D	Deadline
DAS	Detailed Analysis Study
DCO	Development Consent Order
dDCO	Draft Development Consent Order
dMCO	Draft Material Change Order
EA	Environment Agency
EIA	Environmental Impact Assessment
EMA	East Midlands Airport

EMG1 DCO	East Midlands Gateway Rail Freight Interchange and Highway Order 2016
EMG1 site	The area covered by the EMG1 DCO
EMG2	The application for the DCO
EMG2 site	The area described in section 2.2 of chapter 2 of the ES [APP 072]
EMIA	East Midlands International Airport Limited and/ or East Midlands Airport Property Investments (Industrial) Limited as appropriate
ES	Environmental Statement
ExP	Examining Panel
HE	Historic England
HGV	Heavy Goods Vehicle
HIA	Health Impact Assessment
IP	Interested Party
JRC	Joint Radio Company
JSA	Jobseeker's Allowance
LCC	Leicestershire County Council
LEMP	Landscape and Ecological Management Plan
LOAEL	Lowest Observed Adverse Effect Level

LSE	Likely Significant Effects
LVIA	Landscape and Visual Impact Assessment
MCO	Material Change Order
NE	Natural England
NGED	National Grid Electricity Distribution
NH	National Highways
NNNPS	National Networks National Policy Statement
NRMM	Non-road mobile machinery
NSIP	Nationally Significant Infrastructure Project
NWLDC	North West Leicestershire District Council
OEMP	Operational Environmental Management Plan
P-CEMP	Phase Construction Environment Management Plan
PA2008	Planning Act 2008
PINS	Planning Inspectorate
Prologis	Prologis UK Limited and/ or Prologis UK 121 Limited as appropriate
PRoW	Public Rights of Way

PRTM	Pan Regional Traffic Model
RR	Relevant Representation
SEGRO	SEGRO Properties Limited and/ or SEGRO (EMG) Limited as appropriate
SOAEL	Significant Observed Adverse Effect Level
SoS	Secretary of State
SRFI	Strategic Rail Freight Interchange
SRN	Strategic Road Network
STW	Severn Trent Water
SWMMP	Site Waste and Materials Management Plan
TA	Transport Assessment
TCPA	Town and Country Planning Act 1990
The Changes Regulations	The Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011
WSI	Written Scheme of Investigation
2017 EIA Regulations	The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

ANNEX 1A

QUESTION 1.0.2

Table of areas of each individual Works in the Draft DCO Schedule 1

Works No.	Area (m2)	Total Area by Works No. (m2)
1: ADVANCED MANUFACTURING AND LOGISTICS	616,546	616,546
2: ROAD INFRASTRUCTURE	27,244	27,244
3: BUS INTERCHANGE	11,571	11,571
4: HGV PARKING	19,292	19,292
5: HARD AND SOFT LANDSCAPING	244,134	244,134
6: EMG2 ACCESS WORKS	17,210	17,210
7a: HYAM'S LANE WORKS (WEST)	502	11,969
7b: HYAM'S LANE/GRIMES GATE	3,242	
7c: HYAM'S LANE WORKS (EAST)	8,225	
8: M1 NORTHBOUND WORKS	118,911	118,911
9: LINK ROAD FROM M1 NORTHBOUND TO A50 WESTBOUND	76,031	76,031
10: A50 WESTBOUND	21,078	21,078
11: LINK ROAD FROM M1 SOUTHBOUND AND A50 EASTBOUND TO M1 JUNCTION 24	26,736	26,736
12a: A453 / M1 J24 ROUNDABOUT WEST	61,957	92,782
12b: A453 / M1 J24 ROUNDABOUT EAST	30,825	
13 - A6 KEGWORTH BYPASS / A453 JUNCTION IMPROVEMENTS	29,016	29,016
14a: ACTIVE TRAVEL LINK BETWEEN EMG1 AND A453 WEST OF FINGER FARM ROUNDABOUT (NORTHERN SECTION)	12,886	25,049

Works No.	Area (m2)	Total Area by Works No. (m2)
14b&c: - ACTIVE TRAVEL LINK BETWEEN EMG1 AND A453 WEST OF FINGER FARM ROUNDABOUT (SOUTHERN SECTION)	12,163	
15: A453 EAST MIDLANDS AIRPORT JUNCTION CONTROLLED CROSSING	1,529	1,529
16: M1 NORTHBOUND SIGNAGE	6,821	6,821
17: LONG HOLDEN	9,978	9,978
18a: FINGER FARM ROUNDABOUT IMPROVEMENTS	28,718	32,809
18b: FINGER FARM ROUNDABOUT IMPROVEMENTS	4,091	
19: L57 FOOTPATH UPGRADE BETWEEN DISEWORTH LANE AND MOIRA DALE	5,275	5,275
20: EMG1 SUBSTATION	1,576	1,576
21: COMMUNITY PARK	142,774	142,774
Area excluded from Works No. 14 based on revised Active Travel Link (this is not included within the above areas)	2,251	2,251

Notes:

- The areas given for each Works No. includes for overlapping works as shown on the Works Plans. For example, where Works No. 9 overlaps with Works No. 12a on Works Plan Sheet 3 [REF] the area is included within the figures above for both Works Nos. 9 and 12a.
- Limits of Deviation are not taken into account within the above table.

ANNEX 1B



Notes
 1. All dimensions in metres unless noted otherwise. All levels in metres unless noted otherwise.

Legend	
	Community Park Boundary
	1m Contour - Ground Level
	5m Contour - Ground Level
	Contour Interval
	Ground slope 8%+
	Public footpath (Right of way)
	Public bridleway (Right of way)
	Other pedestrian route

ISSUES & REVISIONS					
Rev	Date	Details of issue / revision	Drw	Rev	
P01	24.03.26	Issued for information	DF	SRH	
P02	03.06.26	Public footways added	DF	SRH	
P03	04.06.26	Middle ponds relocated and footway updated	DF	SRH	

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Client

SEGRO

Drawn: D.Fraser Reviewed: S.Hilditch
 BWB Ref: 220500 Date: 24.03.26 Scale@A1: 1:1250

Project Title

EAST MIDLANDS GATEWAY 2 (EMG2)

Drawing Status

FOR INFORMATION

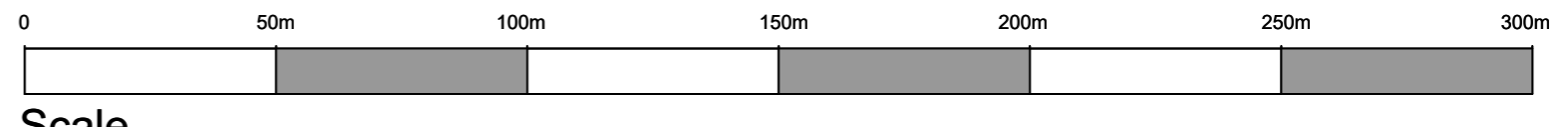
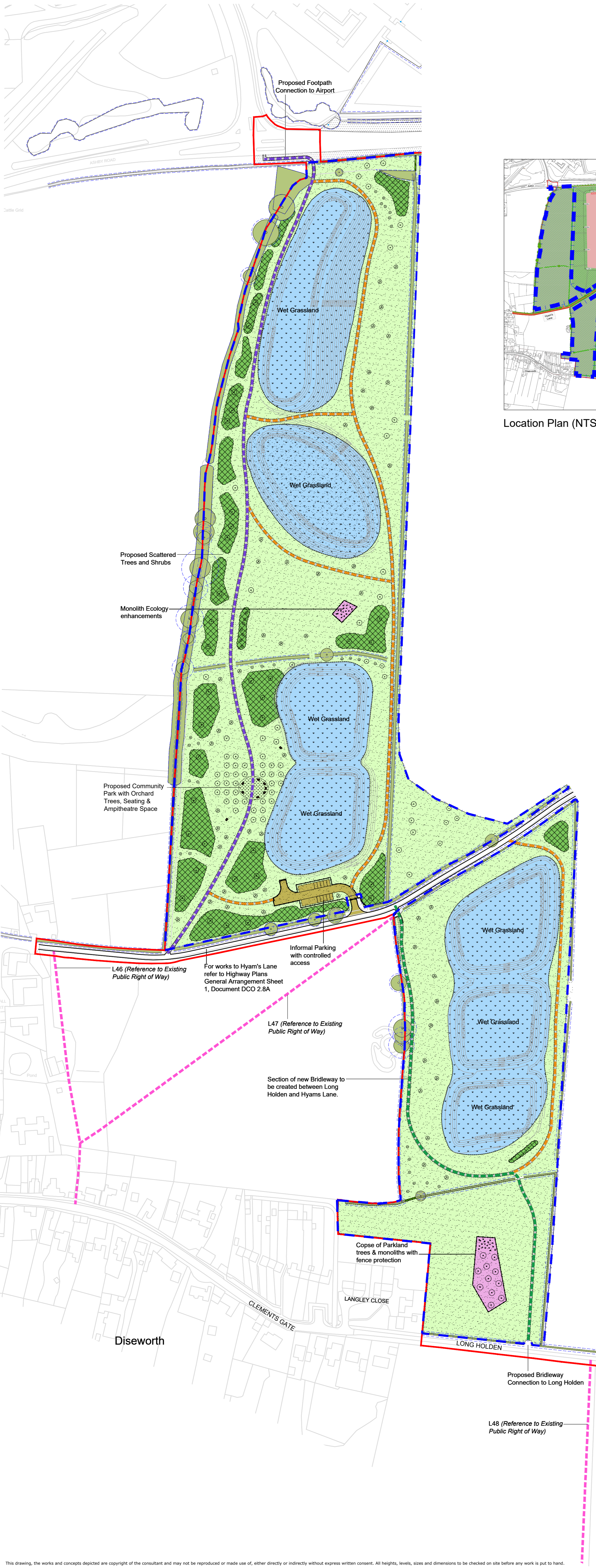
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COMMUNITY PARK GROUND PROFILE

Project - Originator - Zone - Level - Type - Role - Number Status Rev

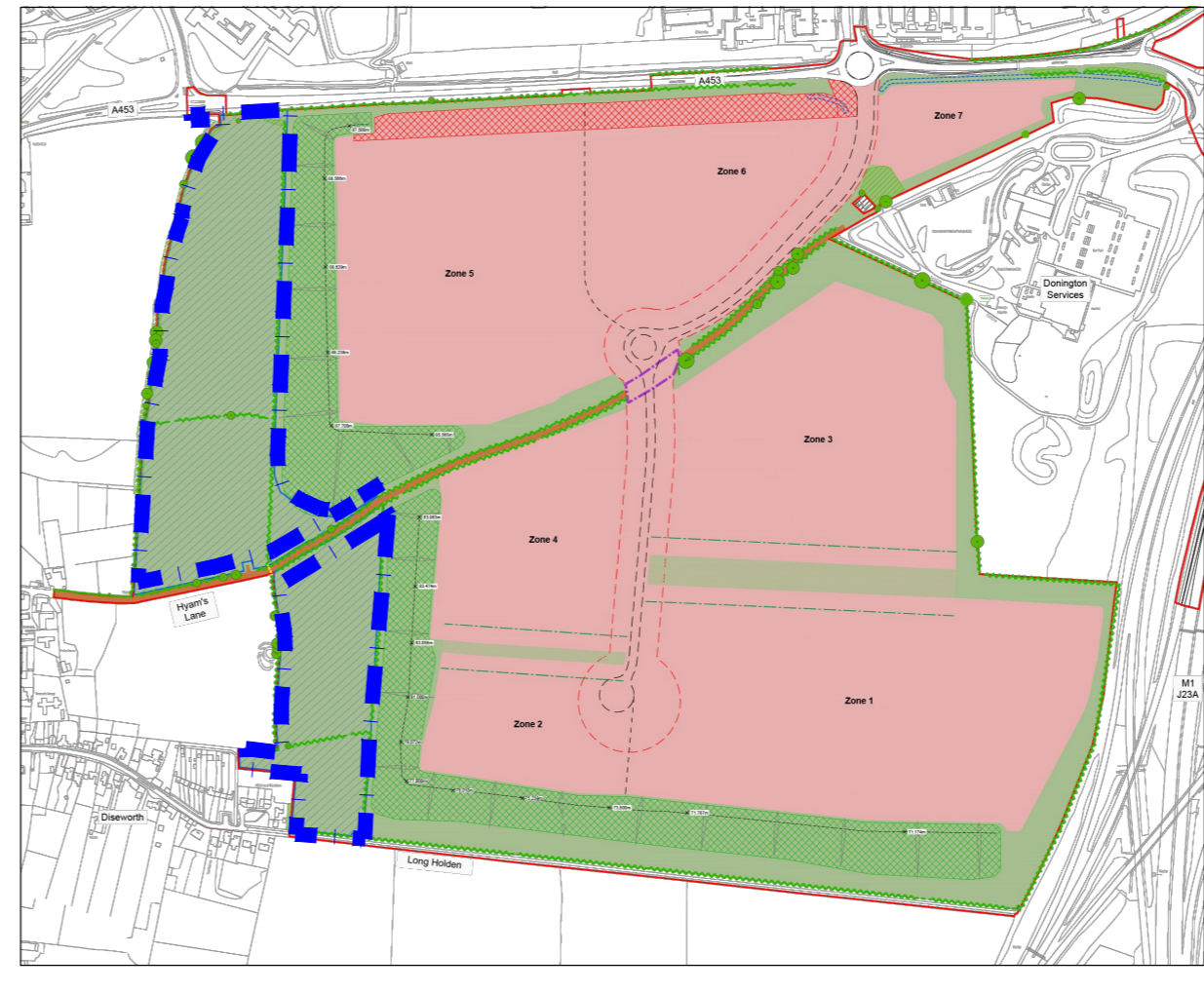
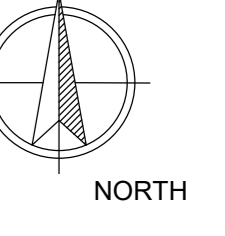
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ANNEX 1C























Scale

Notes:
Layout based upon UMC drawings: EMG2-UMC-SI-DR-A-0089-P5
'Illustrative Masterplan' (received 17/04/2025)



Location Plan (NTS)

Landscape Key

-  Existing Trees/ Hedgerows to be retained
(Refer to FPCR tree removal, retention & protection drawings)
RPA (Root Protection Area)
-  Semi-Mature Trees
20-25cm stem girth
-  Extra Heavy Standard Trees
14-20cm stem girth
-  Multi-Stem Trees
3.5-4m height
-  Feathered Trees
1.2-1.8m height
-  Proposed Thicket / Scrub Mix Planting
Transplants 600-800mm OG planted at 1m centres
-  Proposed Native Hedgerow
Transplants 600-800mm OG planted 2 rows 500mm apart at 450mm staggered centres
-  Proposed Drainage Basins/ Wetland Habitat
-  Proposed Drainage Basins/ Pond Edge Mix
-  Proposed Wildflower Grassland Habitat
-  Proposed Amenity Grass Areas
-  Gravel path with timber edge and associated land drain
(To Engineers Specification)
-  Proposed Pedestrian Routes
Gravel path with timber edge and associated land drain
(To Engineers Specification)
-  Proposed Public Footpath (Right of Way)
Gravel path with timber edge and associated land drain
(To Engineers Specification)
-  Proposed Public Bridleway
Gravel path with timber edge and associated land drain
(To Engineers Specification)
-  Existing Public Right of Way
-  CONTOUR LEVELS
(To Engineers Specification)
-  Indicative Landscape Sections
Refer to 'Landscape Concept Sections' drawing number
EMG2-BCA-ELS-XX-DR-L-2313-23-02 and 03.
-  Community Park Boundary
-  Site Boundary

LANDSCAPE TYPOLOGIES WITHIN COMMUNITY PARK	m ²	Hectare
General Wildflower Including: Main areas of Public Amenity Space Orchard and Surrounding Amenity Area Proposed PROW (Gravel Path With Timber Edge) Excluding: Fenced off Monolith Areas	79,497 m ²	7.9497 ha
Drainage Basin / Wet Wildflower	45,576 m ²	4.5576 ha
Thicket Planting	10,981 m ²	1.0981 ha
Proposed Informal Parking	832 m ²	0.0832 ha
Fenced off Monolith Areas	1,216 m ²	0.1216 ha

P2. Issued for information. MGO MG 10/06/26
P1. Issued for information. MGO MG 08/06/26
Revisions

East Midlands Gateway Phase 2



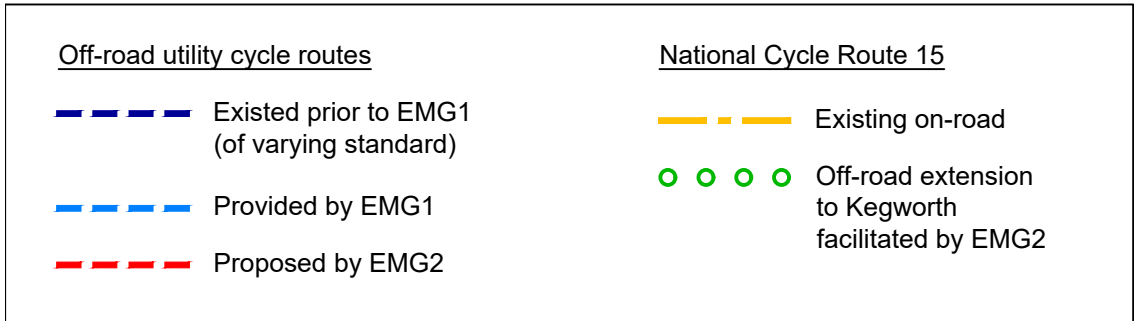
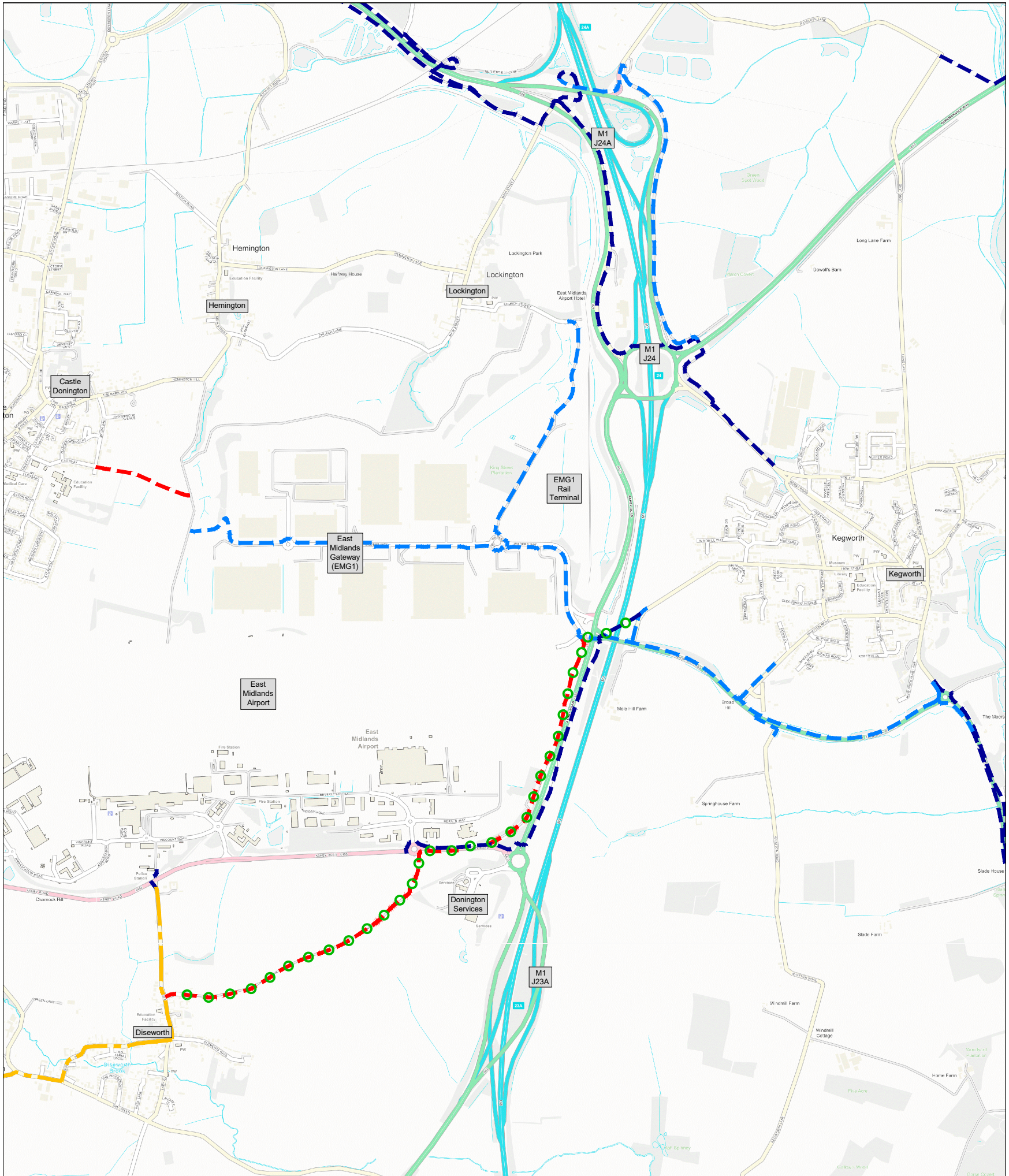
BCA Design Ltd.
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Typology Within Community Park

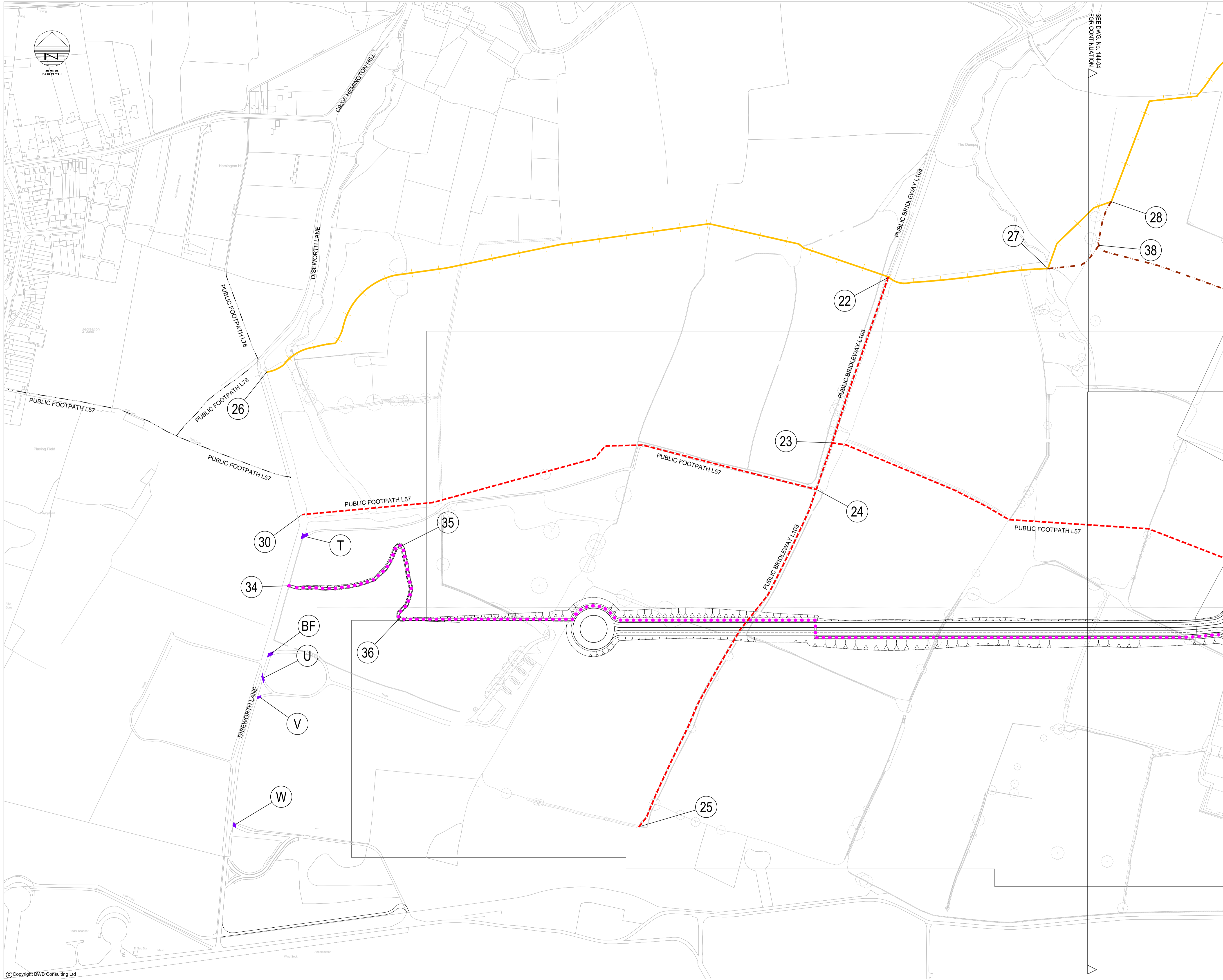
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ANNEX 2A

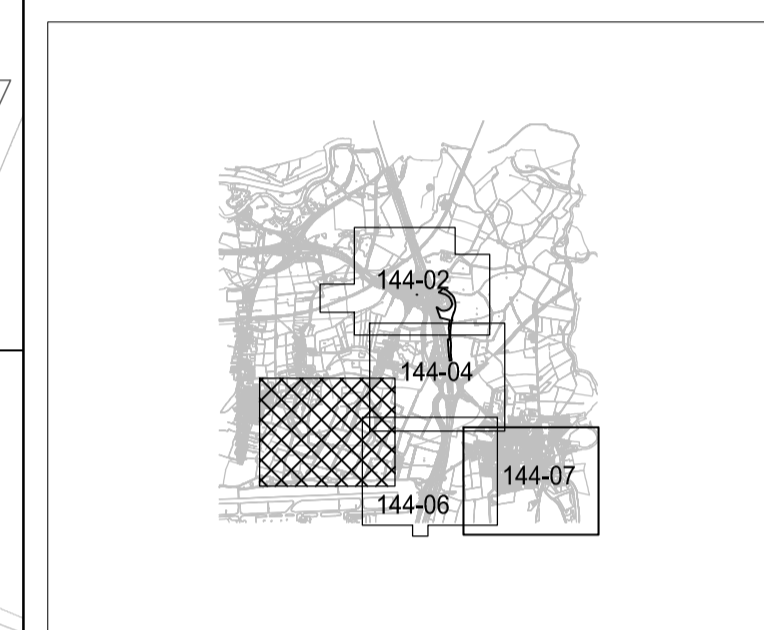




KEY

- HIGHWAY BOUNDARY DIVERTED MOTORWAY SPECIAL ROAD
- HIGHWAY BOUNDARY DIVERTED ALL PURPOSE TRUNK ROAD
- HIGHWAY BOUNDARY DIVERTED PURPOSE LOCAL HIGHWAY
- HIGHWAY BOUNDARY NEW MOTORWAY SPECIAL ROAD CREATED
- HIGHWAY BOUNDARY NEW ALL PURPOSE TRUNK ROAD CREATED
- HIGHWAY BOUNDARY NEW ALL PURPOSE LOCAL HIGHWAY CREATED
- EXISTING PRIVATE MEANS OF ACCESS STOPPED UP
- NEW PRIVATE MEANS OF ACCESS
- EXISTING ALL PURPOSE HIGHWAY TO BE STOPPED UP
- EXISTING PUBLIC FOOTPATH RETAINED
- EXISTING PUBLIC RIGHT OF WAY STOPPED UP
- NEW PUBLIC FOOTPATH CREATED
- NEW PUBLIC BRIDLEWAY CREATED
- NEW CYCLE TRACK CREATED (ALL PURPOSE HIGHWAY FOR USE BY PEDESTRIANS AND CYCLISTS ONLY)
- NEW PERMISSIVE CYCLE TRACK CREATED (PERMISSIVE ROUTE FOR PEDESTRIANS AND CYCLISTS)
- REFERENCE LABELS

0 50 100 150 200
SCALE: METRES



KEY PLAN
(SCALE 1:100,000)

Rev	Date	Details of issue / revision	LM	SRH
P3	23.07.14	ISSUED FOR SUBMISSION	LM	SRH
P2	13.05.14	GENERAL SCHEME UPDATES	SRH	SRH
P1	23.04.14	DRAFT ISSUE	LM	SRH

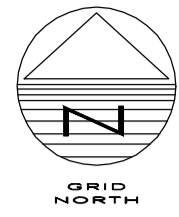
ISSUES & REVISIONS



THE EAST MIDLANDS GATEWAY RAIL FREIGHT INTERCHANGE AND HIGHWAY ORDER 201X

Drawing Title
ACCESS AND RIGHTS OF WAY PLAN SHEET 4 OF 6

Scale	1:2,500	Drawn	S. Hilditch
Size	A1	Reviewed	S. Hilditch
Regulation	5(2) (k)	Document	2.3D
Drawing Status	SUBMISSION		
Drawing No.	BWB/NTH/209/144-05	Revision	P3



SEE DWG. No. 144-04 FOR CONTINUATION

SEE DWG. No. 144-05 FOR CONTINUATION

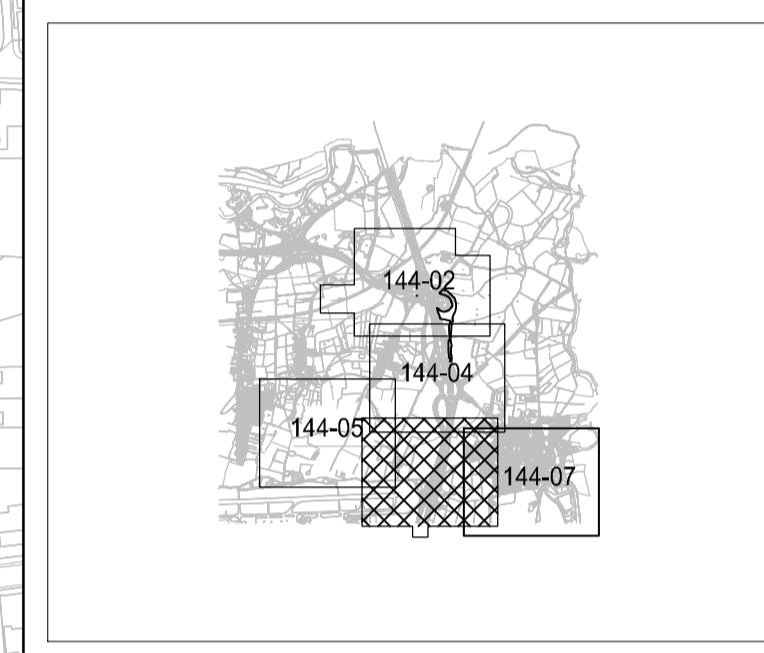
SEE INSET 5-3 FOR CONTINUATION

SEE DWG. No. 144-07 FOR CONTINUATION

KEY

- Highway Boundary: DIVERTED MOTORWAY SPECIAL ROAD
- Highway Boundary: DIVERTED ALL PURPOSE TRUNK ROAD
- Highway Boundary: DIVERTED PURPOSE LOCAL HIGHWAY
- Highway Boundary: NEW MOTORWAY SPECIAL ROAD CREATED
- Highway Boundary: NEW ALL PURPOSE TRUNK ROAD CREATED
- Highway Boundary: NEW ALL PURPOSE LOCAL HIGHWAY CREATED
- EXISTING PRIVATE MEANS OF ACCESS STOPPED UP
- NEW PRIVATE MEANS OF ACCESS
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- REFERENCE LABELS

0 50 100 150 200
SCALE: METRES



KEY PLAN
(SCALE 1:100,000)

P4	08.08.14	MINOR ALTERATIONS	LDH	SRH
P3	23.07.14	ISSUED FOR SUBMISSION	LM	SRH
P2	13.05.14	GENERAL SCHEME UPDATES	LM	SRH
P1	23.04.14	DRAFT ISSUE	LM	SRH
Rev	Date	Details of issue / revision	Drw	Rev



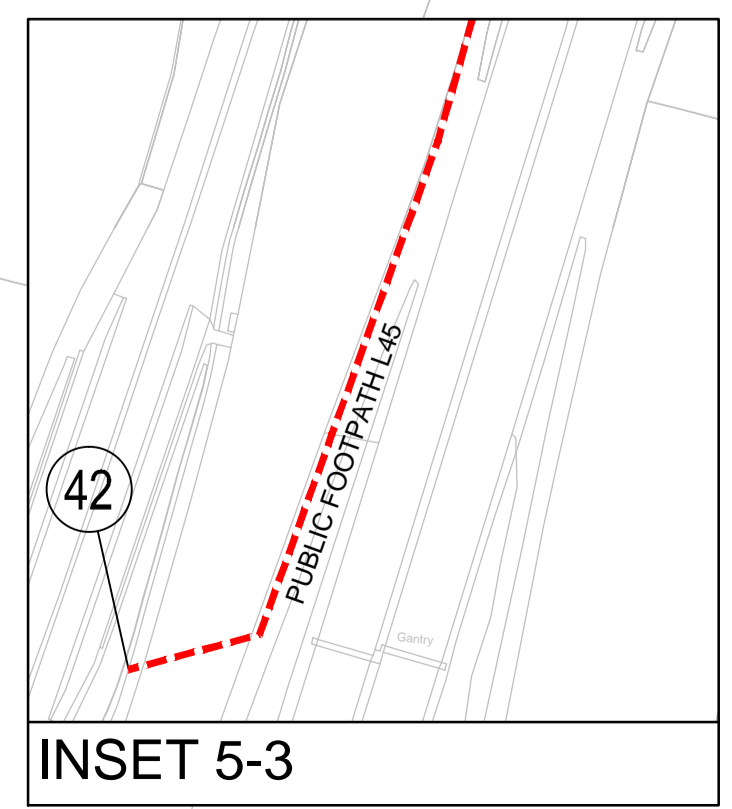
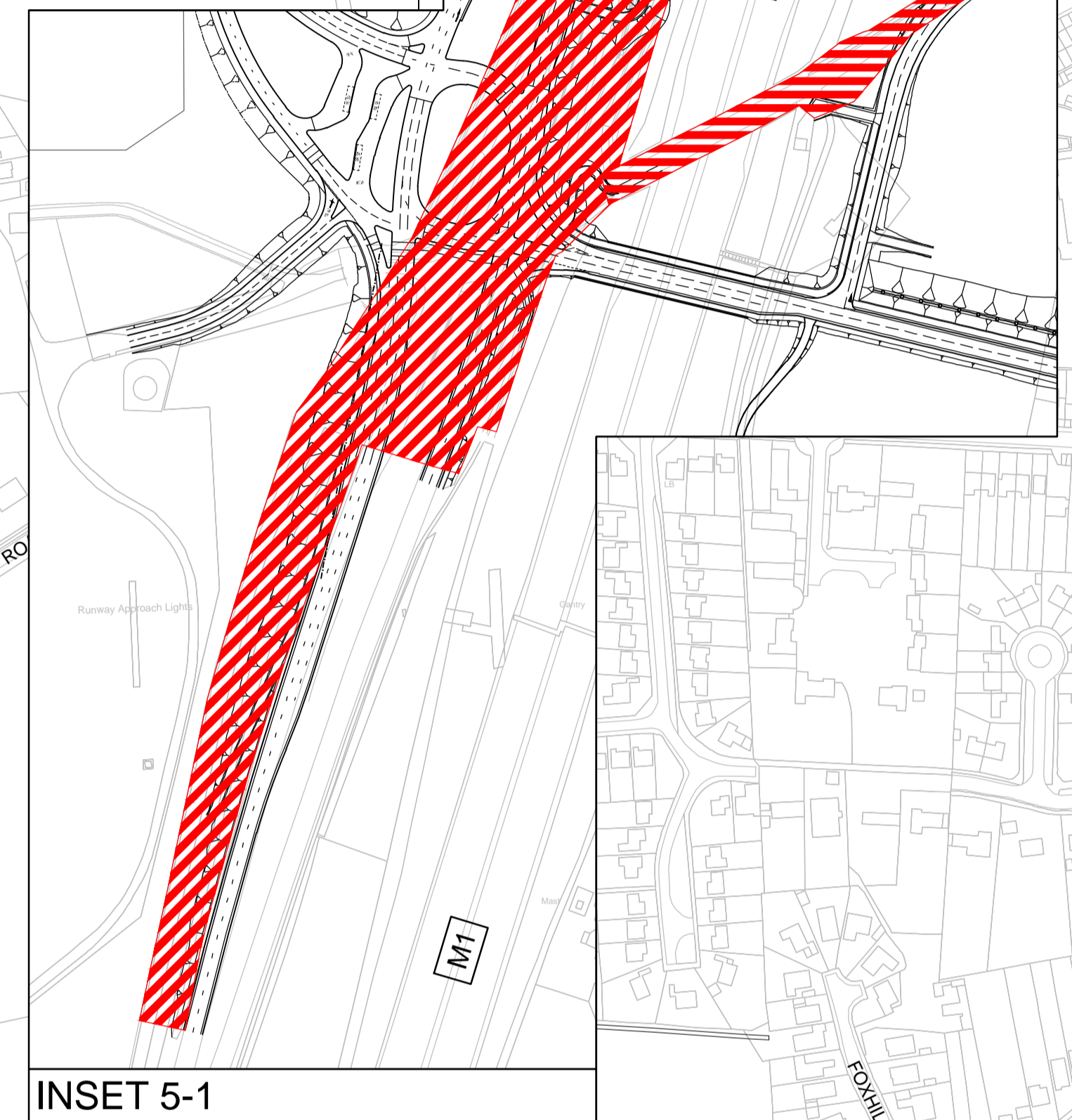
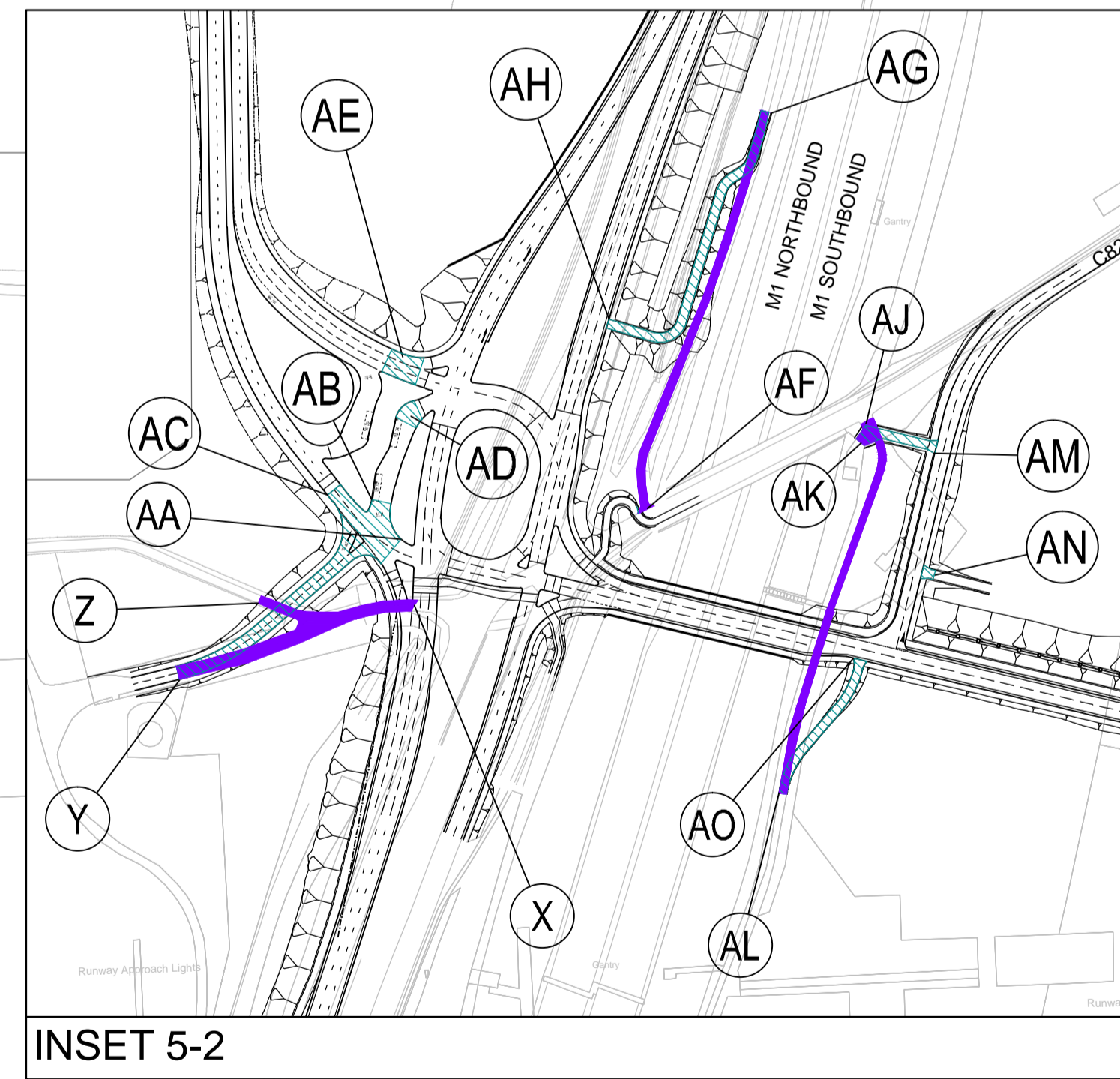
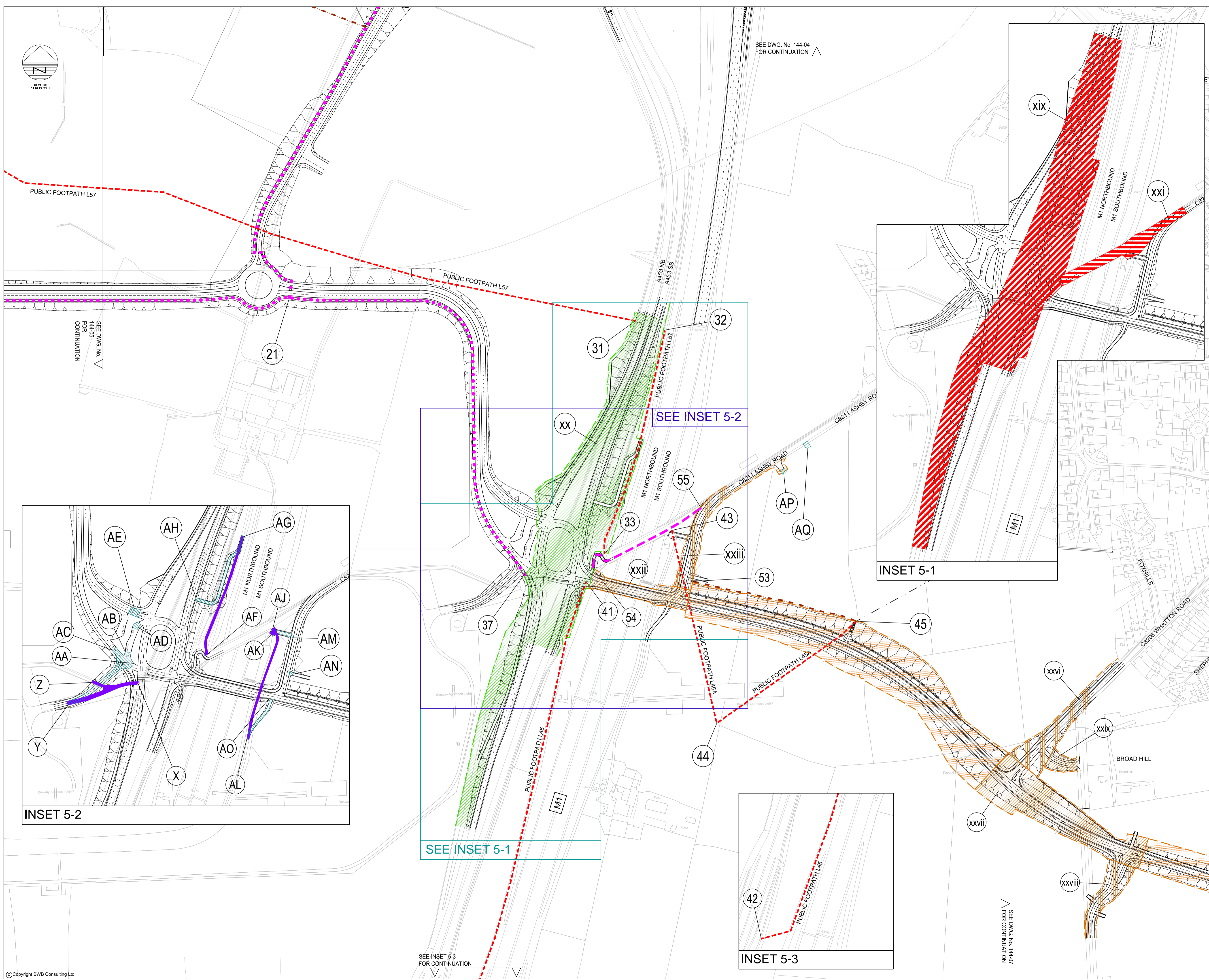
THE EAST MIDLANDS GATEWAY RAIL FREIGHT INTERCHANGE AND HIGHWAY ORDER 201X

ACCESS AND RIGHTS OF WAY PLAN SHEET 5 OF 6

Scale	1:2,500	Drawn	S. Hilditch
Size	A1	Reviewed	S. Hilditch
Regulation	5(2) (k)	Document	2.3E

Drawing Status
SUBMISSION

Drawing No.	BWB/NTH/209/144-06	Revision	P4
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ANNEX 3A

EAST MIDLANDS GATEWAY
TECHNICAL NOTE: CUMULATIVE EFFECTS ON AGRICULTURAL LAND

M W Palmer, PhD, MISoilSci

Report 2098/3
Land Research Associates Ltd
Tapton Innovation Centre
Brimington Road
Chesterfield
S41 0TZ
www.lra.co.uk

13th June 2026

INTRODUCTION

- 1.1 This Technical Note has been prepared in response to a request for further detail regarding the assessment of cumulative effects on agricultural land.
- 1.2 The assessment made in the technical note uses a slightly revised methodology from that originally used in the EIA submission in 2025. This revision is explained in paragraph 1.8.

BACKGROUND

- 1.3 When considering cumulative effects on agricultural land some idiosyncrasies need to be considered in comparison to cumulative assessment of other topics:
 - 1) The effects of land loss to built development are **permanent**. There is therefore no clear logic to limiting relevant sites to only those which are under development, recently consented or under planning consideration, as is the case with other topic areas.
 - 2) The land loss effect of multiple developments is a simple the sum of their areas. This differs for example from an assessment of pollution or habitat loss effects, where there is a wider potential receptor area, including areas outside the sites. One particular problem this presents is that an earlier developments may be responsible for the majority of cumulative land loss but only later developments be regarded as having a significant effect, when a designated threshold is reached.
- 1.4 For these reasons in particular Land Research Associates (LRA) have long taken a position that true cumulative effects do not apply to agricultural land and the topic should not be included in these assessments. However, Natural England, the statutory consultees on matters relating to agricultural land, now recommend that some form assessment of cumulative effects on agricultural land should be made, although they do not currently take a position on what form this assessment should take.
- 1.5 In 2022 IEMA (now ISEP) produced guidance on how EIA of agricultural land should be undertaken¹. Natural England later adopted this guidance as their accepted significance criteria. The guidance includes a draft methodology for assessing cumulative effects, although this has not been formalised and Natural England do not currently advise that this approach must be taken. In the absence of a standardised approach this draft methodology has been adopted by LRA and has been applied to the EMG site.

¹ Stapleton *et al.*, 2022. *A New Perspective on Land and Soil in Environmental Impact Assessment*. Available online at: [2022-iema land and soils guidance.pdf](#). Accessed 13/06/2026

1.6 The principle concepts of the IEMA cumulative approach of note are that:

- It does not limit itself to an approved list of cumulative sites as per other topics (for the reasons outlined in paragraph 1.3)
- It considers cumulative significance of a Site against changes to *rates* of land loss rather than to *total* area
- It considers the national land resource as well as the local resource
- Only losses of Best and Most Versatile² (BMV) agricultural land are considered

METHODOLOGY

1.7 The IEMA/ISEP methodology suggests assessing land loss against a five year rolling average, to account for inter-annual variations. However, as acknowledged in the IEMA/ISEP document, such a five year dataset is not currently available. The data used in this assessment is regarded as the best available and is a **3 year** dataset, most recently from 2019 to 2022, taken from UK Government Land Use Change statistics³. National and local authority area estimates for annual loss of BMV agricultural land are compared against the loss involved in the Proposed Development. In accordance with the suggestion in the IEMA/ISEP guidance, a development accounting for over 1% of BMV land loss locally or nationally is regarded as a significant. The limitations of the approach are discussed in paragraph 1.12.

1.8 The original cumulative assessment of the EMG site undertaken by LRA in 2025 assessed site losses as a proportion of *total* three year land loss (2019-2022). However, while not made explicit in the draft IEMA methodology, the figures in their quoted example appear to suggest average *annual* loss is the figure against which site losses should be compared⁴. Accordingly, the cumulative assessment in this Technical Note is revised to an updated understanding of the guidance, by dividing three year losses by three to give an average annual land loss figure. Use of this adjustment means that the use of a 3 year rather than 5 year dataset does not affect the significance threshold, other than by increasing the likelihood of figures being skewed by inter-annual variations. Estimated annual land loss at the national and local authority level used in the assessment is shown in Table 1 below.

² Grades 1, 2 and Subgrade 3a of the Agricultural Land Classification for England and Wales.

³<https://app.powerbi.com/view?r=eyJrIjoiaMDk0YjkwZjltZDU2Ni00ODQyLThiN2YtNDcyMzBhNjUxZTEwLWVhOCJ9>

⁴ The figure quoted in the IEMA/ISEP example is 6791 hectares per annum for the period 2013-2018. The example suggests this is the figure against which losses should be considered for significance, rather than a total figure for the five year period, which isn't quoted.

Table 1: Loss of land to development: local and national estimates of annual loss in hectares, three years from 2019-2022

Category	England	North West Leicestershire
	Estimated annual losses	
All undeveloped land	16,163 ha / yr	313 ha / yr
All agricultural land	8,768 ha / yr	75 ha / yr
BMV agricultural land ⁵	3,682 ha / yr	31.5 ha / yr

RESULTS

- 1.9 The effect of the Proposed Development in comparison to national land loss is shown in Table 2 below. The data above demonstrate that at a national level the Proposed Development represents 1.1% of annual agricultural land loss and 0.95% of annual BMV land loss. This is not regarded as significant.

Table 2: Proposed Development as a % of estimated annual loss at a national level, three years from 2019-2022

Category	England	Proposed Development	
	Estimated annual losses	Proposed Development	% of national annual loss
All undeveloped land	16,163 ha / yr	100.3	0.6
All agricultural land	8,768 ha / yr	99.4	1.1
BMV agricultural land ⁴	3,682 ha / yr	35.2	0.95

- 1.10 The effect of the Proposed Development in comparison to local land loss is shown in Table 3 below. The data demonstrates that at a local level the Proposed Development represents 132% of local annual agricultural land loss and 112% of annual BMV land loss. This is regarded as significant.

⁵ Based on Natural England/Defra estimate of 42% of agricultural land being BMV nationally. This derives from previous surveyed land and is likely to be skewed towards land intended for development, disproportionately located in lowland areas.

Table 3: Loss of land to development: Proposed Development as a % of estimated annual loss at a local level, three years from 2019-2022

Category	North West Leicestershire	Proposed Development	
	Estimated annual losses	Proposed Development	% of local annual loss
All undeveloped land	313 ha / yr	100.3	32
All agricultural land	75 ha / yr	99.4	132
BMV agricultural land	31.5 ha / yr	35.2	112

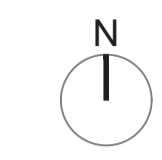
LIMITATIONS

- 1.11 The use of a 1% threshold for significance is arbitrary. While it is a logical argument that a less than 1% reduction in a resource means most of the resource is retained, this logic only applies to the *total* resource, rather than the *rate of its loss*. In the current study, the total resource of BMV agricultural land in North West Leicestershire is large (estimated at between 8000 and 9000 ha) relative to the scale of average annual development loss (estimated as 31.5 ha per annum). However, applying a 1% threshold to the *rate of loss* is always likely to result in significance, simply because such large development sites are rare. This suggests that the use of a 1% threshold is inappropriate to the methodology. However, no other threshold is suggested in the guidance and even using a much higher threshold gives a high likelihood of significance on a local level.

SUMMARY AND CONCLUSIONS

- 1.12 The development of the site represents a relatively large loss of BMV land at a local scale, representing a significant increase in estimated rates of BMV land loss. This is regarded as significant. At the national scale the development represents a relatively small proportion of BMV land loss and is not judged as significant.
- 1.13 The proposed Development site is a very large greenfield site, a scale of development which occurs very rarely within the local authority area. The proportion of Best and Most Versatile agricultural within the Site (35%) is below the estimated national average of 42%. Using the methodology proposed by IEMA/ISEP it is very likely that any similar-sized development would be considered as having a significant effect on cumulative land loss. In fact any loss of BMV land in excess of 3 ha would be regarded as significant on this basis.

ANNEX 5A



Notes:

All dimensions to be verified on site. Do not scale this drawing, use figure dimensions only. Drawing to be read in conjunction with Arboricultural Assessment and Appendix A - Tree Schedule.
The exact position of individual trees or species included as part of a tree group, woodland or hedgerow should be checked and verified site prior to and decisions for foundation design, tree operations or construction activity being undertaken. Further survey work would be required for calculation foundation depths.

- Tree considered to be Veteran under BNG definition
- Tree considered to be Veteran under NPPF definition
- T1(A)
G1(A) Individual/Group number and BS5837:2012 Category
- Root Protection Area
- Veteran/Ancient Tree and Ancient Woodland Buffer Zone
(in accordance with Ancient and Other Veteran Trees: Further Guidance on Management)



-	20.04.2026	First Issue.	TCB / TCB
A	05.06.2026	Amended	TCB / TCB
B	08.06.2026	Amended	TCB / TCB
rev	date	description	drwn/chkd

client
SEGRO PLC

project
East Midlands Gateway 2 (EMG2)

title
VETERAN TREE BUFFER PLAN

number
10666-FPCR-T-37

scale
NOT TO SCALE

status
-

rev
B

ANNEX 7A

ExQ2: 2 June 2026

Responses due by deadline 4: 16 June 2026

2	Question to:	Question:
Q7.0.2	The applicants Prologis EMIA	Alternatives Can the applicants provide further information about the negotiations they have had with affected persons (principally East Midlands Airport and Prologis) about <u>entering into</u> a joint venture to develop both northern and southern parcels of land subject to the EMG2 main site? For example, whilst the <u>ExP</u> acknowledges the applicants have provided some <u>high level</u> chronology of engagement, is there any further information about the details of the joint venture that was discussed, options for how the land might be jointly developed and any other alternatives to compulsory acquisition duly explored? For clarity, does East Midlands Airport or Prologis dispute as a matter of fact whether the negotiations took place as set out in the applicants' response to relevant representations [REP1-051D] , or do their objections principally relate to the substance of negotiations that took place?
Q7.0.3	The applicants	Timing of when alternatives were explored <u>In light of</u> the Prologis submissions [REP2-050D] relating to the timing of when alternatives should have been explored, please can the applicants explain the importance of timing and evidence how this was <u>taken into account</u> during their exploration of alternatives?

NOTE: There is a Non-Disclosure Agreement in place, dated 30 October 2025, between the DCO Applicant, Prologis UK Limited, Prologis UK 121 Limited, East Midlands International Airport Limited and East Midlands Airport Property Investments Limited ("NDA"). Certain correspondence between the parties has also been made on a without prejudice basis. The DCO Applicant is content to disclose all information and correspondence covered by the NDA and without prejudice; however, Prologis and EMIA have not agreed to such disclosure or to waive the without prejudice. Accordingly, the level of detail provided below reflects these constraints. This particularly affects the information that can be supplied in section 4 below.

1.	<p>Summary of Engagement and Approach</p> <p>SEGRO has undertaken extensive and sustained efforts over several years to acquire the interests of EMIA and, more latterly, Prologis by agreement, consistently prioritising voluntary transactions over the use of compulsory powers. These efforts have included multiple offers, progressively improved over time, and consideration of a wide range of alternative structures, including option agreements, joint ventures, outright acquisition and access arrangements.</p> <p>Constructive engagement on the part of the DCO Applicant has taken place, initially with EMIA from 2019 until 2024 / 2020 and then with Prologis from late in 2024 when it became known to the DCO Applicant that they had acquired an interest in the EMG2 Main Site. That engagement is ongoing at the time of writing. However, agreement has not been reached, primarily due to a lack of alignment on commercial terms rather than any absence of meaningful negotiation or reasonable endeavours on the part of the DCO Applicant.</p>
2.	<p>Overview</p> <p>As is standard industry practice for large and complex sites, SEGRO has been progressing land assembly for EMG2 since 2018/19, with a preference for securing control by way of option agreements. This approach has been successfully employed by the DCO Applicant at its DCO-consented SRFIs at EMG1 and Northampton Gateway.</p> <p>The DCO Applicant previously acquired land for EMG1 from EMIA by way of an option agreement in 2016. Engagement between the DCO Applicant and EMIA continued during the delivery of EMG1. In late 2019 / early 2020, SEGRO commenced discussions with EMIA in relation to land south of the airport (EMG2).</p> <p>These discussions included joint promotion of the land through the emerging Local Plan process, alongside parallel negotiations in respect of land assembly. The parties also explored opportunities to maximise the benefits of the emerging Freeport designation, including the potential for a joint venture covering land within the Freeport boundary.</p> <p>The DCO Applicant subsequently made a number of offers to acquire an interest in the EMIA land, both by way of option agreement and outright purchase. The DCO Applicant's final offer was rejected by EMIA in October 2024.</p> <p>Prologis' involvement in the EMIA land, including its freehold acquisition of the former Jarrom land, became known to SEGRO in late 2024. The DCO Applicant then contacted Prologis to commence discussions which first took place in February 2025 with a view to agreeing terms by private treaty. These discussions remain ongoing. Prologis has confirmed to the DCO Applicant that it is authorised to undertake those discussions on behalf of EMIA also. The latest position is that SEGRO is awaiting a response to an offer made to Prologis on 22 April 2024. SEGRO has continually chased but has been advised that it is currently under discussion between Prologis and EMA.</p>

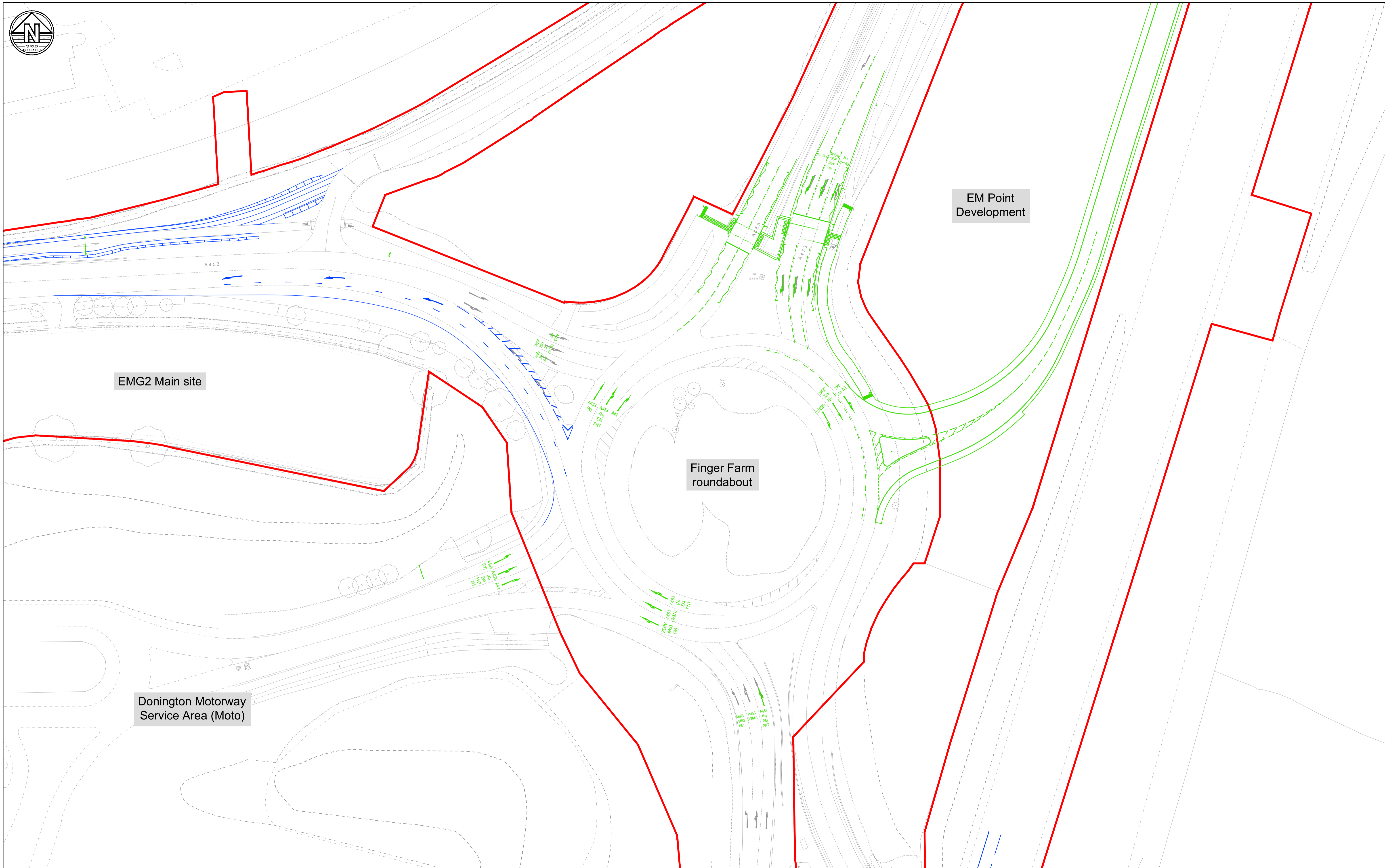
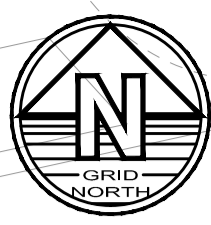
	Further detail on the negotiations and alternative structures explored with both EMIA and Prologis is set out below.	
3.	Negotiation of Alternatives with EMIA prior to Prologis' involvement	
a.	Joint Venture (from March 2021 to October 2021)	<p>Following announcement of the successful Freeport bid, EMIA/SEGRO held meetings to discuss a potential joint venture (JV) to include those areas identified as Freeport on the operational airport (including the Western Maintenance Area and the Western Car Parks) as well as to include the EMG2 Main Site. Discussion included the potential to use SEGRO's airside development expertise (from its landholdings around Heathrow) with EMIA's existing and potential customer base, in order to maximise opportunities for airside users. The discussions included potential speculative development of units in order to maximise the Freeport benefits based on EMIA contributing land and SEGRO contributing buildings. Plans were produced and initial financial appraisals shared.</p>
b.	On other alternatives	<p>Discussions began with EMIA in late 2019/early 2020 to consider alternative options to a JV. Discussions, and attempts by SEGRO to have discussions with EMIA, continued with various differing personnel on behalf of EMIA from time to time up until September 2024.</p> <p>SEGRO made offers to EMIA to acquire an option over the EMIA land in February 2020 and again in June 2021.</p> <p>In June 2021, SEGRO and EMIA again discussed a potential JV, outright acquisition of EMIA's freehold interests (subject to performance based overage if when development was consented) and option agreements.</p> <p>By July 2022, Heads of Terms for an exclusivity agreement and conditional contract to purchase the EMIA land were in circulation. The terms were agreed with, and recommend by, EMIA's own independent agent, subject to EMIA board approval. To SEGRO's surprise, the EMIA board rejected these terms. SEGRO and EMIA had by then entered into the Exclusivity Agreement (with SEGRO paying a substantial sum to EMIA in the form of an exclusivity fee) and had worked with EMIA to enter on to their land by agreement to undertake intrusive surveys.</p> <p>Discussions continued after July 2022 and SEGRO made a further offer in August 2023 (price to be calculated based on market value) without any positive response from EMIA. Having exhausted all efforts to acquire by agreement and work with EMIA to bring forward the EMG2 Main Site, SEGRO applied for the s.35 Direction which was subsequently obtained in February 2024.</p> <p>SEGRO continued to try and engage with EMIA after securing the s.35 Direction but discussions were very strained.</p>

		<p>SEGRO made it known to EMIA that it remained keen to acquire the land by agreement and avoid resorting to compulsory acquisition. That being the case, SEGRO made further offers in June 2024, July 2024 and August 2024, each time improving on the previous offer with limited feedback.</p> <p>EMIA has characterised SEGRO's efforts to engage with them and acquire their land by agreement as not being a "proper or coherent attempt at negotiations". This could not be further from the truth. Consistent and repeated efforts have been made over many years. Indeed, SEGRO considers that it made every reasonable effort to acquire EMIA's land interests on credible, market-facing terms, consistent with its established track record in engaging constructively with landowners.</p>
4.	Negotiation of Alternatives with Prologis	
	<p>Upon learning of Prologis acquiring an interest in late 2024 Segro immediately sought to engage with them. After some delay the first engagement took place in February 2025 and extensive engagement has continued since that time. The engagement has explored a range of potential alternatives to compulsory acquisition, including outright acquisition, joint venture structures and access-based solutions. A timeline / summary of those discussions is set out below but is subject to the constraints referred to above.</p>	
	October 2025	Prologis /EMIA sign option agreement.
	12 February 2025	Initial meeting with Prologis. SEGRO confirmed that it wished to enter into discussions to avoid compulsory acquisition. Potential options proposed by SEGRO.
	7 March 2025	Prologis respond including proposing further alternatives.
	25 April 2025	SEGRO responds.
	27 May 2025	Agree to meet to discuss all potential alternatives to CPO.
	14 July 2025	Meeting between Prologis and SEGRO including SEGRO's UK Managing Director and Prologis' Senior Vice President, Regional Head, UK, in an attempt to facilitate decision making and accelerate progress in negotiations of alternatives.
	6 August 2025	Meeting between Prologis and SEGRO.
	5 September 2025	SEGRO wrote to Prologis to further explore alternatives
	29 September 2025	Prologis offers to set out Heads of Terms for Option 3, the proposed Access Solution. Prologis confirms it is open to exploring both a sale and joint venture route but does not state how much it would sell for.
	October/November 2025	NDA signed on 30 October 2025 to enable to exchange of more detailed financial information on a confidential basis between the parties. NDA to include EMIA to ensure full transparency between all three parties.

		.
	November 2025	Freeport chair arranges a meeting between them, SEGRO and Prologis with a view to expediting/facilitating a commercial agreement to enable the entire Freeport site to come forward within the Freeport window.
	12 November 2025	Memorandum of Understanding signed between Prologis SVP Regional Head UK and SEGRO Managing Director UK to record agreed actions and to collaborate in trying to find a way forward.
	17 November 2025	Further discussion of alternatives - full information pack provided to Prologis by SEGRO
	21 November 2025	SEGRO/Prologis call to discuss information provided by SEGRO. EMIA invited but unable to attend.
	26 November 2025	Prologis reciprocates by issuing information.
	December 2025	Exchange of comments and discussion between the parties Comments back and forth on various issues
	December 2025/January 2026	Infrastructure specialists from SEGRO/Prologis meet
	6 January 2026	Meeting to update Freeport.
	13 February 2026	SEGRO letter to Prologis setting out updated position on options explored.
23	25 February 2026	Meeting between SEGRO and Prologis to discuss various routes to agreement.
	26/27 February 2026	Correspondence from SEGRO to Prologis, and Prologis to SEGRO clarifying agreed actions from meeting.
	9 March 2026	SEGRO suggests a meeting to progress discussions during a suitable break in the oral hearings, updates Prologis on progress in getting landowner consent to release terms of its Option Agreement and requests reciprocal visibility on terms of Prologis agreement with EMIA.
	13 March 2026	Correspondence confirming availability/willingness for each party's independent valuers /CPO experts to meet.
	20 March 2026	Email from SEGRO to Prologis confirming meeting arranged between CPO Valuers.
	9 April/16 April 2026	Further correspondence
	13 April 2026	Meeting to progress negotiations.

	22 April 2026	Meeting to progress negotiations. Prologis expect to respond having discussed proposals with EMIA, within a week.
	23 April 2026	Further contact SEGRO to Prologis chasing response to meeting of 22April
	11 May 2026	Prologis provides outline summary of its Option Agreement with EMIA.
	2 & 3 June 2026	Further contact SEGRO to Prologis chasing response to meeting of 22 April
	12 June 2026	Further contact SEGRO to Prologis chasing response to meeting of 22 April. Still awaiting response which is dependent upon Prologis discussions with EMIA.

ANNEX 18A



Notes

- Do not scale this drawing. All dimensions must be checked/ verified on site. If in doubt ask.
- This drawing is to be read in conjunction with all relevant architects, engineers and specialists drawings and specifications.
- All dimensions in millimetres unless noted otherwise. All levels in metres unless noted otherwise.
- Any discrepancies noted on site are to be reported to the engineer immediately.

Legend	
	EMG2 Proposed design
	EM Point Proposed design taken from S278 General Arrangement Layout drawing revision C03
	EMG2 Order Limits

ISSUES & REVISIONS					
Rev	Date	Details of issue / revision	Drw	Rev	
P01	10.02.26	Issued for information	DF	SRH	

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Client

SEGRO

Drawn: D.Fraser Reviewed: S.Hilditch
 BWB Ref: 220500 Date: 10.02.26 Scale@A1: 1:1000

Project Title

EAST MIDLANDS GATEWAY 2 (EMG2)

Drawing Status

FOR INFORMATION

Drawing Title

EM POINT & EMG2 HIGHWAY WORKS INTERFACE

Project - Originator - Zone - Level - Type - Role - Number Status Rev

EMG2-BWB-GEN-XX-SK-CH-SK071 S2 P01

ANNEX 18B

EAST MIDLANDS GATEWAY **INTERIM EMPLOYMENT SCHEME FOR THE ENABLING WORKS OF** **THE INITIAL CONSTRUCTION PHASE.**

Due to the scale of this speculative development, Roxhill suggest that the Employment Scheme is broken down in three distinct phases reflecting the chronology of how the scheme will be developed:

1. Initial Construction Phase (Enabling Works, Site Access, Services and Plot Plateaus etc.).
2. Construction Phase (Buildings dependant on securing tenants).
3. Occupation Phase.

Roxhill propose that this is a live document and will be subject to regular 6 monthly reviews as a minimum with all key stakeholders to ensure we promote employment in the areas identified by North West Leicestershire district Council (NWLDC) and Leicestershire County Council (LCC).

Phase 1 – Initial Construction Phase

Winvic have been selected as the Main Contractor by Roxhill and have prepared the below Employment Scheme for the Initial Construction Phase:

This document has been produced in response to the NWLDC & LCC requirement for an Employment Scheme and Skills Strategy.

Winvic Construction will be acting as Principal Contractor for the development of a new construction project, East Midlands Gateway. As a policy, Winvic Construction will endeavour to engage with local schools and colleges and employment agencies. Our senior management team have and will actively promote Winvic and the construction industry by educational visits to the local community.

Winvic will carry out our undertakings with reference to the Work Programme Initiative and the Work Programme Provider Guidance. Winvic will endeavour where practicable to source operatives with the correct skill sets and experience locally to the project.

Phase 1 itself will be split into several key sections, the first being the earthworks. It is planned for up to 30 operatives to be involved with this element of the works. The employment scheme will be regularly reviewed by the relevant stakeholders at the start of the various stages of the project.

This strategy document deals with:

1, Work experience placements

Due to the short duration of the project stages and the specialist nature of the works, in the past it has been difficult to facilitate lasting work placements. This is due to the changing work streams on site and the availability of suitable placements.

2, Construction curriculum support activities

Winvic are keen to support local schools/colleges and we will be making contact as part of support of the Considerate Constructors Scheme and Go construct. School/college visits will be facilitated during the construction phase of the project as Winvic are keen to show case the construction industry and develop sustainable career prospects

Winvic will consult with and liaise with local schools and in particular Stephenson's College and any other local educational services

3, Apprenticeship supported

Due to the short duration of the project the establishment of apprenticeship schemes are not practical for the project. Winvic Construction will be looking into matter in the near future. The main subcontract package for the earthworks will Collins Earthworks. Collins Earthworks are based in Nottinghamshire. Collins Earthworks actively supports apprenticeships and has currently 4 young person's working under apprenticeship schemes. Winvic will ascertain from the other subcontractors that are due to be engaged on the project, what apprenticeship schemes are planned and are running. This information will be shared with the relevant stakeholders when it becomes available.

4, Local Employment

Where possible Winvic Construction will source local labour and this will be evidence via our Biometric access control system, which can be evidenced at any point during the construction phase of the development. Due to the specialist works on site, alternative local labour will be required for secondary roles on the project such as catering, cleaning, security and IT. Winvic will also encourage our subcontractors to source local resources.

5, Supply Chain

With regard to labour, sub-contract labour appointments and commissions, these will be dealt with through the pre-contract and estimating process, whereby we go out to tender on all labour and supply elements to ensure best value and with full regard to the Employment Scheme document.

6, Assistance required

Where Winvic Construction encounter challenges with meeting the strategy document, we will engage with the relevant parties to aid the issues raised i.e. Local Agencies, Leicester and Leicestershire Economic Partnership, Job Centre, Local Colleges, Schools etc.

7, Biometrics

Winvic has implemented a biometric recording system on site. This system will be able to provide information on work force movement patterns, training information and travel distance. Winvic are happy to supply this information as long the information is protected under the Data Protection act

8, Local Impact Report

Following the Local Impact Report prepared as part of the Examination of the development, it is noted that the ten most deprived Leicestershire Super Output Area's (LOSA's) includes LOSA's from Greenhill, Coalville and parts of Loughborough and therefore these three areas, within Leicestershire will be given consideration during the resourcing of labour and resources for the project.

At the present Winvic Construction are proud to have the following young persons in further education.

Year out students:

Adam McKenna - BSc Hons Construction Management, completed 2 years

Mark Jamieson - BSc Hons Civil Engineering, completed 2 years

Hamza Asif - BEng Hons Civil Engineering, completed 2 years

Supporting through College/University:

Jordan Penny- BTEC HND Diploma Construction and the Built Environment, year 3

Dylan Askew - HNC Construction Management, year 2

Paige Tarry - HND Construction Management, year 1

Ricky Green - HND Construction Management, year 1

Jake Davis - BSc Hons Construction Management and Civil Engineering top up degree, year 1

Macaulay Dibbo (starts 17th October) - BSc Hons Quantity Surveying, year 2

The lead person within Winvic Construction dealing with recruitment of trainees and management of work placements is the company's HR co-ordinator supported by the Operation/Project Manager.

The HR Manager at Winvic is Rebecca Schwarz - rebeccaschwarz@winvic.co.uk – Tel 01604 678960.

ANNEX 18C



EAST MIDLANDS GATEWAY

Construction Phase Employment Scheme

Due to the scale of this speculative development, Roxhill suggest that the Employment Scheme is broken down in three distinct phases reflecting the chronology and sequencing of the scheme, as it will be developed:

Infrastructure Phase (Enabling Works, Site Access, Services and Plot Levelling, etc.).

Construction Phase (Construction of Buildings which is dependent on securing Tenants).

Occupation Phase. (Building occupation by Tenants)

Roxhill propose that this is a live document and will be subject to regular six-monthly reviews, as a minimum, with all key stakeholders to ensure we promote employment in the areas identified by North West Leicestershire District Council (NWLDC) and Leicestershire County Council (LCC).

Phase 2 – Construction Phase

Winvic have been selected as the Main Contractor by Roxhill and have prepared the below Employment Scheme for the Construction Phase; however, if other Main Contractors are introduced, they will adopt the below agreed strategy.

This document has been produced in response to the NWLDC & LCC requirement for an Employment Scheme and Skills Strategy.

Winvic Construction Ltd. will be acting as Principal Contractor for the Development of East Midlands Gateway.

As a policy, Winvic Construction will endeavour to engage with local schools and colleges and employment agencies.

Our senior management team have and will actively promote Winvic and the construction industry by educational visits to the local community.

Winvic will carry out our undertakings with reference to the Work Programme Initiative and the Work Programme Provider Guidance.

Winvic will endeavour, where practicable and as it makes good economic sense, to source operatives with the correct skill sets and experience locally to this project.



This strategy document deals with:

1. Work Experience Placements

Due to the short duration of some of the project stages and their specialist nature, in the past it has proven difficult to facilitate lasting work placements.

This is due to the changing work streams on site and the availability of suitable placements. But we are constantly working with senior management, our primary contractors and local colleges to increase the numbers of these placements.

2. Construction Curriculum Support Activities

Winvic are very eager to support local schools/colleges and we will contact them once a contract has been initiated and ask if they would like to participate and/or visit site. We do this also as part of promoting the Considerate Constructors Scheme and Go Construct.

School/college visits will be facilitated during the construction phase of the project as Winvic are keen to showcase our part in the construction industry and develop sustainable career prospects and attract young people into the industry.

Winvic will consult and liaise with local schools and Stephenson's College and any other local educational services in the area, Roxhill and Winvic will commit to producing a quarterly report to evidence this.

3. Apprenticeship Supported

Because of the short-term nature of such projects, the establishment of apprenticeship schemes spread over years, are not practical.

However, Winvic Construction are currently considering this matter to see how we can overcome this in the future.

The main subcontract package for our earthworks will be contracted to Collins Earthworks. Collins Earthworks are based locally in Nottinghamshire.

Collins actively support apprenticeships and currently has 4 young person's working under apprenticeship schemes.

Winvic will ascertain from the other subcontractors, once engaged on the project, what apprenticeship schemes are planned and are running.

This information will be shared with the relevant stakeholders when it becomes available. Roxhill and Winvic will commit to producing a quarterly report to evidence this

4. Local Employment

Winvic Construction Ltd has been based in Northampton since its conception.

The business has developed from one carrying out local projects with a local supply chain of companies, to one which has grown to cover a broad geographical area which covers the length and breadth of the UK.

These same companies, have grown with us to become national contractors.

Our business success is partly due to limiting the supply chain of suppliers and contractors we work with and providing them with repeat business on the understanding that they continually deliver a quality product on time and always strive to improve and raise standards.

We choose our suppliers for each project based on their experience within the sector and their ability to deliver, which would include their ability to resource the project and their geographical location.

The vast majority of our projects do provide opportunities for the employment of some local labour directly to ourselves and we do encourage our suppliers to offer any vacancies locally.

We actively encourage the use of local companies in each location we work in to supplement our strong links with our long-established supply chain.

By working closely with our supply chain partners over a long period and providing them with continuity of work, we have been able to obtain a commitment from them to employ apprentices for our projects.

This is assisted by utilising the local markets to bring together second and third tier suppliers to work with our main supply chain.

The advantages that have been secured are;

Reduced costs from local knowledge

Less travelling/haulage and better continuity of labour resources.

By working repeatedly with small to medium sized enterprises we have enabled many of our supply chain to grow and become national contractors.

Our Commitment

As part of our continuing commitment to supporting the communities in which we work and local resourcing we will:

Commit to meet with NWLDC to define an Action Plan and agree specific realistic targets in respect of employment, training and investment.

Identify key members of staff to implement, monitor and report on the Action Plan.

Endeavour to provide local employment and training where possible for the duration of the project.

Commit to utilise local suppliers and services directly or via our supply chain contractors.

Engage with local schools and colleges where appropriate to provide educational site visits

Local Supply Chain

As described above we have an established supply chain of national contractors and suppliers who serve our business nationwide, some of which are based in the Leicester/Nottingham/Derby/Staffs area, as follows:

Collins Earthworks - Kirkby in Ashfield, Notts.
WK Construction - Hinckley, Leics.
Coalville Cleaning Services – Coalville Leics.
RJ Property & Construction Services – Chilwell, Notts.
ID Surveys Limited – Burbage, Leics.
Construction Testing Services – Wolvey, Leics.
WME Electrical – Glenfield, Leics.
Concast – Burton -Upon- Trent, Staffs.
Hormann Doors – Coalville Leics.
G & A Fire Protection - Market Harborough, Leics.
WMBS Mechanical Services – Thurmaston, Leics.

Where possible Winvic Construction will source local labour, and this will be evident via our Biometric access control system, which can print a list of employees addresses. Due to some of the specialist works on site, alternative local labour will be required for secondary roles on the project such as catering, cleaning, security and IT. Winvic also encourage our subcontractors to source local resources, Roxhill and Winvic will commit to producing a quarterly report to evidence this

5. Supply Chain

With regards to labour, sub-contract labour appointments and commissions, these will be dealt with through the pre-contract and estimating process, whereby we go out to tender on all labour and supply elements to ensure best value and with full regard to the Employment Scheme document.

Recording the value of supply chain contracts will not be possible as this is commercially sensitive

6. Assistance required

Where Winvic Construction encounter challenges with meeting the strategy document, we will engage with the relevant parties to aid the issues raised i.e. Local Agencies, Leicester and Leicestershire Economic Partnership, Job Centre, Local Colleges, Schools etc.

7. Biometrics

Winvic has implemented a biometric recording system on site. This system will be able to provide information on work force movement patterns, training information and travel distance. Winvic are happy to supply this information as long the information is protected under the Data Protection act.

8. Local Impact Report

Following the Local Impact Report prepared as part of the Examination of the development, it is noted that the ten most deprived Leicestershire Super Output Area's (LOSA's) includes Roxhill and Winvic will commit to producing a quarterly report to evidence this

LOSA's from Greenhill, Coalville and parts of Loughborough and therefore these three areas, within Leicestershire will be given consideration during the resourcing of labour and resources for the project.

At present Winvic Construction are proud to have the following young persons in further education.

Year out students:

Adam McKenna - BSc Hons Construction Management, completed 2 years

Mark Jamieson - BSc Hons Civil Engineering, completed 2 years

Hamza Asif - BEng Hons Civil Engineering, completed 2 years

Matt Tillen - BSc Hons Construction Management, starting Summer 2018

Glenn Walton - BSc Hons Civil Engineering, starting Summer 2018

Nirav Lad - BSc Hons Construction Management, starting Summer 2018

Peter Shipman - BSc Hons Quantity Surveying, starting Summer 2018

George Johnson - BSc Hons Quantity Surveying, starting Summer 2018

All of the above students will be at some point working on the project.

Supporting through College/University:

Jake Davis - BSc Hons Construction Management and Civil Engineering top up degree, year 2

Jack Langton – HNC Building, year 1

Paige Lambert – MSc Quantity Surveying, year 1

Dylan Askew – BSc Hons Quantity Surveying and Commercial Management, year 1

Ricky Green - HND Construction Management, year 1

Scott Robinson - BSc Hons Quantity Surveying and Commercial Management, year 1

Mason Houston - BSc Hons Quantity Surveying, year 1

Sam Harrington - BSc Hons Quantity Surveying and Commercial Management, year 1

Paige Tarry - HND Construction Management, year 2

Macaulay Dibbo - BSc Hons Quantity Surveying, year 3

The lead person within Winvic Construction dealing with recruitment of trainees and management of work placements is the company's HR co-ordinator supported by the Operation/Project Manager.

The HR Manager at Winvic is Rebecca Schwarz - rebeccaschwarz@winvic.co.uk

– Tel 01604 678960.

ANNEX 18D



EAST MIDLANDS GATEWAY

Occupation Phase Employment Scheme

Due to the scale of this speculative development, Roxhill suggest that the Employment Scheme is broken down in three distinct phases reflecting the chronology and sequencing of the scheme, as it will be developed:

Infrastructure Phase (Enabling Works, Site Access, Services and Plot Levelling, etc.).

Construction Phase (Construction of Buildings which is dependent on securing Tenants).

Occupation Phase. (Building occupation by Tenants)

Occupation Phase

Roxhill propose that this is a live document and will be subject to regular six-monthly reviews, as a minimum, with all key stakeholders to ensure we promote employment in the areas identified by North West Leicestershire District Council (NWLDC) and Leicestershire County Council (LCC).

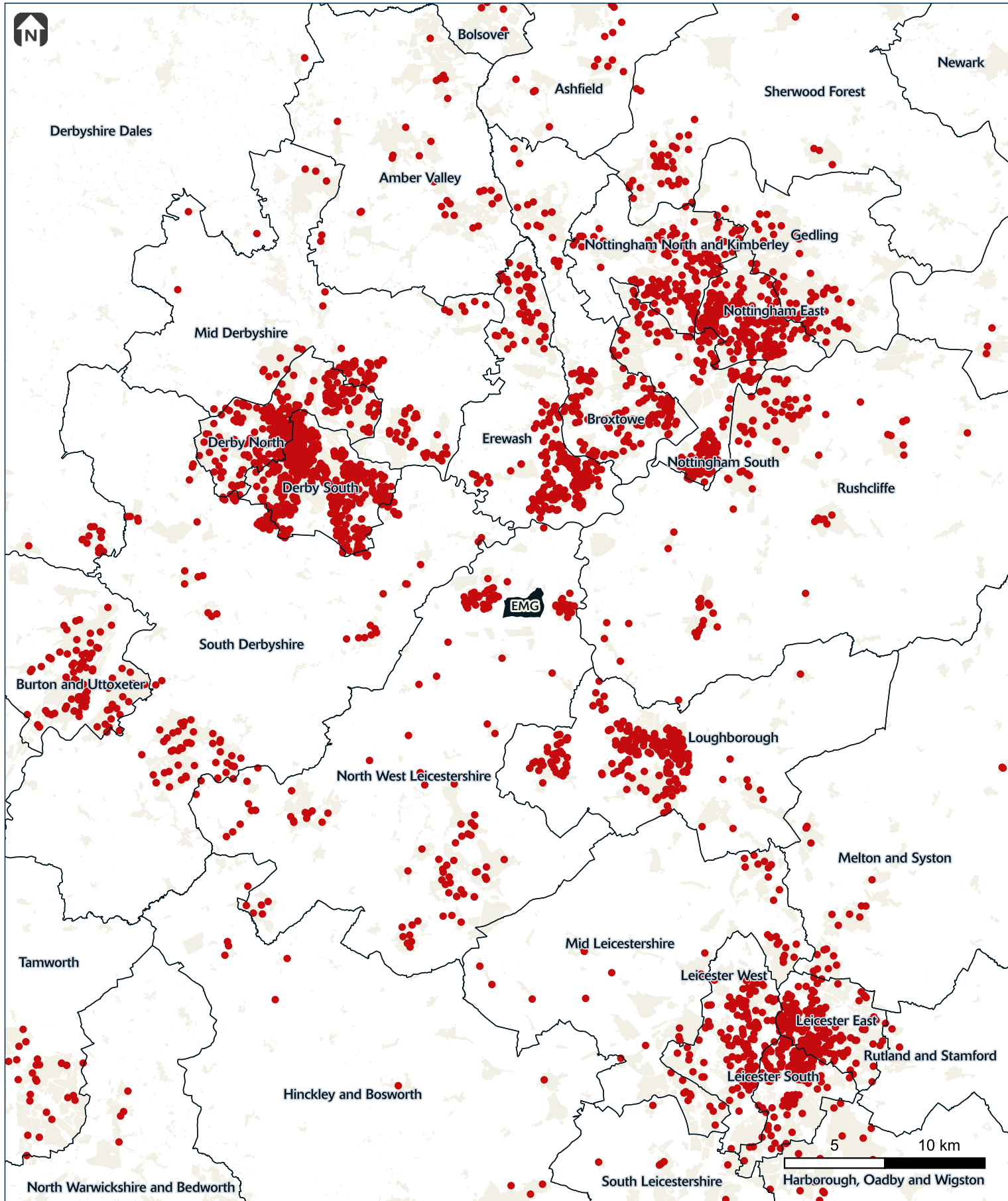
Roxhill will use all reasonable endeavours to introduce the occupiers to the established Steering group consisting of representatives from NWLDC, LCC, the LLEP, DCC & NCC as early as possible, and to promote and to maximise access for the local workforce and in particular, unemployed persons to information about employment opportunities, focusing on Job Centre locations where employment deprivation has been identified.

Roxhill will also assist with the promotion to the occupiers of NWLDC's 'Soft Landing Package' which is hoped will further assist the occupiers with sourcing labour and training etc.

Roxhill/Segro to encourage occupiers to work with the Steering Group to develop an annual recruitment strategy to support the company and their ongoing recruitment needs. Strategies could include:

- Commitment to participate in jobs fairs
- Commitment to engage with recruitment initiatives, such as Sector Based Work Academies and Disability Confident that support those further from the workplace back into employment.
- Commitment to collaborate with local schools, colleges and educational bodies to showcase careers opportunities within the organisation and across the sector.

ANNEX 18E



Prepared PC Reviewed SM Date Sep 2025

Key
 □ Westminister Parliamentary Constituencies
 ● Employee Home Postcodes

Project EMG2
 Figure Title
 EMG1 Employee Home Postcodes by Westminister Parliamentary Constituencies



ITP | Haskoning

Revision A Project Number PC6158
 Date Sep 2025 Figure Number 1

ANNEX 19A

STAGE 1 ROAD SAFETY AUDIT BRIEF

EMG2 HIGHWAY WORKS

EMG2-BWB-GEN-XX-RP-CH-0016



1 PROJECT SUMMARY

Project	EMG2 Highway Works		
Document Number	EMG2-BWB-GEN-XX-RP-CH-0016	BWB Ref	220500
Prepared By	BWB Consulting Ltd	Status	S4
Overseeing Organisation	National Highways (NH) and Leicestershire County Council (See further details below)	Revision	P03
Report Title	Stage 1 RSA Audit Brief	Date	13.11.2025

Prepared By:	Simon Hilditch
Signed & Dated:	
Position:	Director
Organisation:	BWB Consulting Ltd

I approve the RSA brief and instruct the RSA to take place on behalf of the overseeing organisation:	
Name:	Kate Stephen
Signed & Dated:	
Organisation:	National Highways (NH)

I approve the RSA brief and instruct the RSA to take place on behalf of the overseeing organisation:	
Name:	Harry Horsley / Adrian Whiteman
Signed & Dated:	
Organisation:	Leicestershire County Council (LCC)

STAGE 1 ROAD SAFETY AUDIT BRIEF

EMG2 HIGHWAY WORKS

EMG2-BWB-GEN-XX-RP-CH-0016



2 GENERAL DETAILS

General

Highway Scheme Name:	EMG2 Highway Works
Road Numbers:	M1 A42 A50 A453 Hunter Road Hyam's Lane Long Holden
Type of Scheme:	Major highway works, see descriptions below
Road Safety Audit Stage:	1

Contact Details

Role	Organisation	Contact name	Email	Phone
NH sponsor and RSA contact	National Highways	Kate Stephen	kate.stephen@nationalhighways.co.uk	
LCC sponsor and RSA contact	Leicestershire County Council	Harry Horsley / Adrian Whiteman	harry.horsley@leics.gov.uk adrian.whiteman@leics.gov.uk	0116 305 4562
Design Team Leader	BWB Consulting Ltd	Simon Hilditch	simon.hilditch@bwbconsulting.com	07917 578 775
Police	Leicestershire Constabulary		rsu@leics.police.uk	0116 222 1236

Audit Team

- 2.1 The following Audit Team is proposed and current CVs and records of ongoing professional development are provided.

Position	Contact name	Qualifications
Audit Team Leader	Andrew Oakes	MSoRSA National Highways approved Certificate of Competency
Audit Team Member	Naomi Cook	MSc FCIHT National Highways approved Certificate of Competency

- 2.2 National Highways staff are to be involved in the audit, they should be contacted by the Audit Team at the outset by emailing area7safetyteam@nationalhighways.co.uk.
- 2.3 The Audit Team should liaise with the LCC road safety audit team regarding any findings that affect the local road network.

STAGE 1 ROAD SAFETY AUDIT BRIEF

EMG2 HIGHWAY WORKS

EMG2-BWB-GEN-XX-RP-CH-0016



Terms of reference

- 2.4 This Audit Brief is prepared in accordance with GG 119 "Road Safety Audit" revision 2 and the Audit shall be undertaken in accordance with this brief and GG 119.
- 2.5 The Audit is to be a Stage 1 Audit to inform the ongoing preliminary design and it is recognised that a further formal Stage 1 Audit will be required at the end of the preliminary design stage.
- 2.6 Separate chapters shall be provided for each area of highway works.

3 SCHEME DETAILS

- 3.1 The overall scheme details are as follows:

Scheme Overview and Purpose	The scheme is to provide access to phase 2 of the East Midlands Gateway scheme, known as EMG2. It comprises several elements of works as set out further below.
Extent / Scope of Audit	Entire highway works
Construction Programme	Preliminary design (to DCO submission): 2025 DCO examination and determination: 2025/6 Construction: 2027 onwards
Design standards	Design Manual for Roads and Bridges; Specification for Highway Works Leicestershire County Council standards for local highway works
Location of Audit Information	J:\2022\220500-East Midlands Gateway Phase 2\ProjectDelivery\01-WIP\Reports\RSA\RSA1 Entire Scheme\Design Information

- 3.2 The scheme location is shown on **Figure 1** below. This is show in more detail on drawing EMG2-BWB-GEN-XX-SK-CH-SK042 provided with the Audit Information.

STAGE 1 ROAD SAFETY AUDIT BRIEF

EMG2 HIGHWAY WORKS

EMG2-BWB-GEN-XX-RP-CH-0016

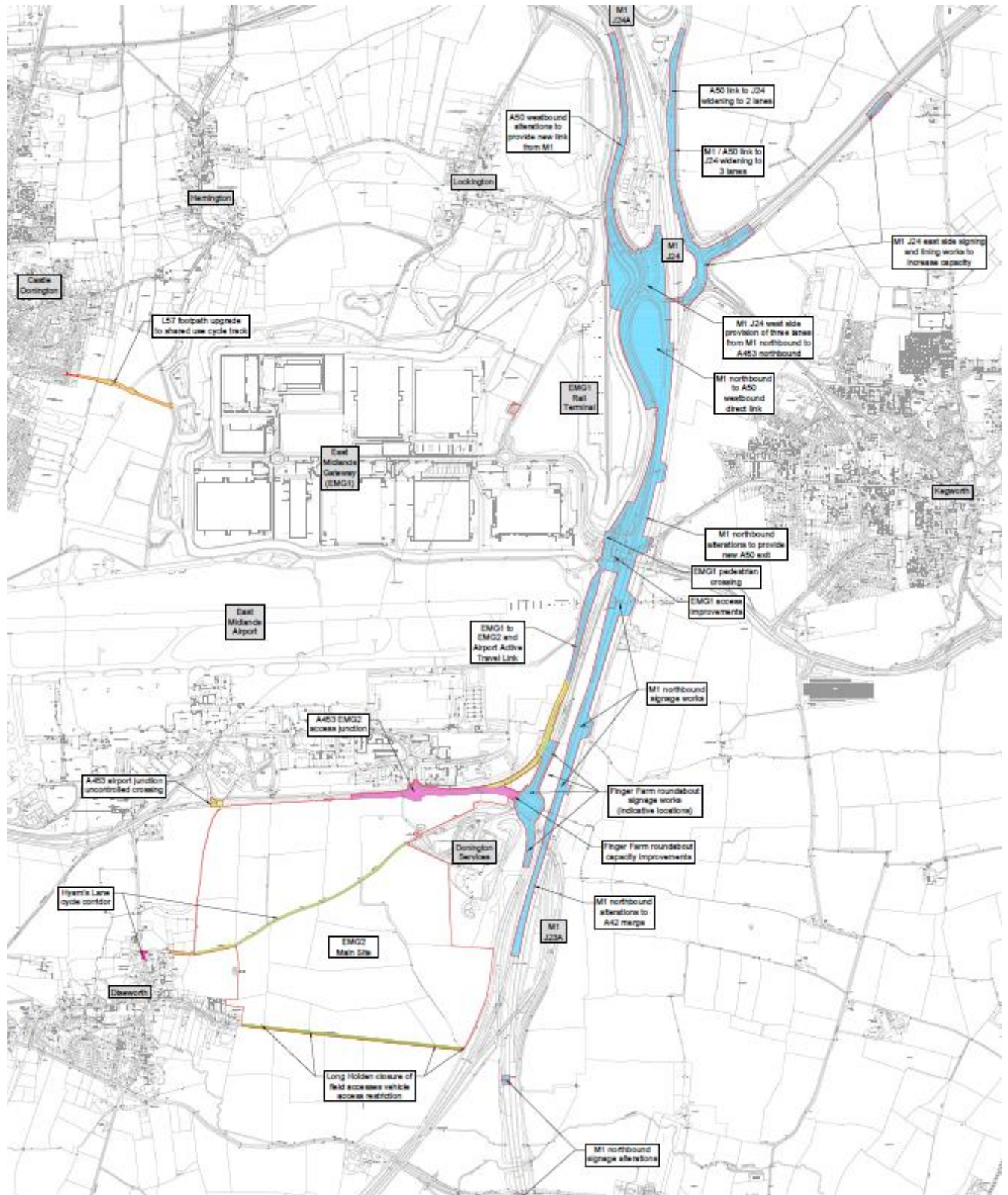


Figure 1: Scheme location

STAGE 1 ROAD SAFETY AUDIT BRIEF

EMG2 HIGHWAY WORKS

EMG2-BWB-GEN-XX-RP-CH-0016



Schedule of highway works

3.3 The following highway works are included within the overall scheme and the details of the relevant Overseeing Organisation are set out for each.

Location	EMG2 works reference	Description of Works	Overseeing Organisation
A453 EMG2 access junction	6	Capacity improvement and provision of access into EMG2	LCC
Hyam's Lane	7	Active travel improvements, closure of field accesses, provision of a turning head	LCC
M1 northbound corridor	8	Provision of new diverge to A50 Signage and signalling alterations	NH
M1 Junction 24	9, 10, 11, 12	Capacity improvements including provision of a new free-flow link from the M1 Northbound to A50 westbound	NH
A453 EMG1 access junction	13	Junction capacity improvement and pedestrian crossing facilities	NH
EMG2-EMG1 active travel link	14	New active travel link alongside the A453	NH and LCC (see plans for split of responsibility)
A453 EMA access junction	15	Provision of an uncontrolled pedestrian crossing over the A453	LCC
Long Holden	17	Closure of field accesses, control of vehicle access	LCC
Finger Farm works	18	Capacity improvement on A453 WB exit Signage works	NH and LCC (see plans for split of responsibility)
L57 upgrade	19	Upgrade of footpath to a cycle track	LCC

Location specific information

- 3.4 For each component of highway works, location specific information is provided in the tables below. Refer to drawing EMG2-BWB-GEN-XX-SK-CH-SK042 provided with the Audit Information for location references.
- 3.5 Traffic data is derived from Leicestershire County Council's Pan Regional Transport Model (PRTM), a strategic transport model for the area. The traffic flows are derived from the PRTM modelling that was undertaken in February 2025. This traffic data provides a suitable forecast of likely future traffic flows for the purposes of the Stage 1 RSA. The PRTM modelling is being currently being updated to include for all the proposed mitigation schemes and as result the data provided it subject to change.
- 3.6 All traffic flow data is taken from the 2038 without Development scenario with the proposed development manually assigned as this provided a robust assessment for the VISSIM modelling.
- 3.7 The peak hour traffic flow given is the flow into the junction. The Annual Average Daily Traffic (AADT) flow is the AADT flow on the link (i.e. a two-way flow). The traffic speed is on the approach to the junction.
- 3.8 The WCHAR assessment report, document EMG2-BWB-GEN-XX-RP-TR-0005, contains details of surveys of pedestrians, cyclists and equestrians.

STAGE 1 ROAD SAFETY AUDIT BRIEF

EMG2 HIGHWAY WORKS

EMG2-BWB-GEN-XX-RP-CH-0016



Component	M1 NB and Junction 24			
Scheme section	M1 NB J23A-24 mainline location A	M1 NB J24 diverge location B	A50 westbound location C	A50 EB to J24 prior to M1 SB merge location D
Design speed (kph)	120	70	85	85
Speed limit (mph)	National Speed Limit (Variable Mandatory)	National Speed Limit (Variable Mandatory)	50 then National Speed Limit	50
Lighting provision	Yes	Yes	Yes	Yes
Peak hour flows (Vehicles)	NB = 6,855 AM / 7,690 PM	NB = 1,233 AM / 873 PM	WB = 3,263 AM / 2,693 PM	Not available
AADT (two-way vehicles)				52,731 vehs
85 th %ile Traffic speed	106 kph	40 kph	89 kph	64 kph
Queue lengths	n/a as mainline	Not available	n/a as mainline	n/a as mainline
WCHAR flows & considerations	n/a as Motorway	n/a as Motorway	Adjacent local access road (past the hotel) has facilities for walking and cycling	Adjacent segregated route provided for walking and cycling
Environmental constraints			Mature woodland at western boundary	Floodplain to east of link road
Other constraints	Existing highway boundary, existing M1 bridges		Railway corridor (serving EMG1) is to the immediate west	Existing highway boundary

STAGE 1 ROAD SAFETY AUDIT BRIEF

EMG2 HIGHWAY WORKS

EMG2-BWB-GEN-XX-RP-CH-0016



Component	M1 NB and Junction 24		EMG1 site access junction	
Scheme section	M1 SB / A50 EB to J24 location E	A453 Northbound approach location F	A453 Southbound approach location G	EMG1 Access (private) location H
Design speed (kph)	85	120	120	60
Speed limit (mph)	50	50	50	30
Lighting provision	Yes	Yes	Yes	Yes
Peak hour flows (Vehicles)	SB = 2,469 AM / 2,301 PM	NB = 1,792 AM / 1,909 PM	SB = 1,089 AM / 615 PM	1,250 vehs AM 1,256 vehs PM
AADT (two-way vehicles)	25,669 vehs	20,356 vehs	9,369 vehs	13,783 vehs
85 th %ile Traffic speed	55 kph	63 kph	47 kph	46 kph
Queue lengths	n/a as mainline	Not available	Not available	Not available
WCHAR flows & considerations	Adjacent segregated route provided for walking and cycling	No existing facilities and none are proposed	Shared use footway/cycleway crossings present within junction to cross the A453	Pedestrian crossing proposed at the exit
Environmental constraints	Floodplain to east of link road			
Other constraints	Existing highway boundary		EMG1 site and rail terminal, presence of M1 and end of airport runway	EMG1 site and rail terminal

STAGE 1 ROAD SAFETY AUDIT BRIEF

EMG2 HIGHWAY WORKS

EMG2-BWB-GEN-XX-RP-CH-0016



Component	EMG2 site access junction			Hyam's Lane	Long Holden
Scheme section	A453 west arm location I	A453 east arm location J	Hunter Road arm location K	Hyam's Lane location L	Long Holden location M
Design speed (kph)	100	100	60	n/a	n/a
Speed limit (mph)	50	50	30	National speed limit (no signing or lighting)	National speed limit (no signing or lighting)
Lighting provision	Yes, on immediate approaches to junctions	Yes	Yes	No	No
Peak hour flows (Vehicles)	1,605 AM / 1,530 PM	2,470 AM / 2,445 PM	525 AM / 446 PM	n/a	n/a
AADT (two-way vehicles)	17,243vehs	27,030 vehs	5,338 vehs	Very low	Very low
85 th %ile Traffic speed	42 kph	48 kph	34 kph	n/a	n/a
Queue lengths	Not available	Not available	Not available	n/a	n/a
WCHAR flows & considerations	Footway facility is present on north side of A453	Toucan crossing proposed between EMG2 access junction and Finger Farm roundabout; shared use facility present on north side of A453	Existing shared use facilities	Currently used as a public footpath, reputedly has some occasional equestrian use	In part used as a public footpath, reputedly has some occasional equestrian use
Environmental constraints				Historical route with mature hedgerows	Mature hedgerows
Other constraints	North side of A453 is developed (Pegasus Business Park)	North side of A453 is developed (Pegasus Business Park)	Road is within Pegasus Business Park (road is private beyond A453 boundary)		

STAGE 1 ROAD SAFETY AUDIT BRIEF

EMG2 HIGHWAY WORKS

EMG2-BWB-GEN-XX-RP-CH-0016



4 LOCALITY

General description

4.1 M1 Junctions 24 and 24A, together with 23A, form a major hub in the East Midlands motorway network as they link the M1 to the A42, A50 and A453 trunk roads as well as the A6 and serve East Midlands Airport (EMA) and the East Midlands Gateway strategic rail freight interchange (EMG1).

4.2 The following paragraphs describe the locality for each component of the highway works.

M1 northbound J23A-24

4.3 The M1 Northbound between junctions 23A and 24 is a busy weaving section of the M1 between where the A42 joins and the A50 and A453 (to Nottingham) leaves. It is a four-lane 'smart' motorway with variable mandatory speed limits, having been so upgraded in the late 2010s. The northbound exit to J24 experiences regular queuing back onto the mainline M1.

M1 Junction 24 signalised roundabout

4.4 The M1 Junction 24 roundabout is fully signalised with up to 5 circulating lanes. It was improved as part of the EMG1 scheme which removed traffic between the A50 westbound and M1 southbound from the junction by means of a new free-flow link (at J24A). The A453 northbound to A50 westbound movement was taken out of the junction by means of a segregated left-turn lane. There is limited scope for further widening of the junction notably at the two M1 bridges, both of which have 3 lanes.

4.5 At the northeast quadrant there is an exit from the adjacent quarry, and on the western side of the M1 there is a large abnormal load bay within the roundabout that has regular use by abnormal loads, support vehicles and NH traffic officers.

A50 westbound exit from J24

4.6 The A50 westbound, after the merge with the segregated left-turn lane from the A453, forms an interchange link joining with the mainline A50 as part of M1 J24A. A significant portion of this length of road is a historical dual carriageway (it was part of the A6 prior to the A50) and does not have hard strips.

A50 eastbound / M1 southbound link to J24

4.7 This link was provided as part of the EMG1 scheme but now suffers from blocking back from the J24 signals.

A453 / A6 / EMG1 site access junction

4.8 The signalised junction serves the EMG1 site and also connects to the A6 Kegworth Bypass. There is a bus interchange for EMG1 immediately adjacent and the junction is in close proximity to the end of the EMA runway.

EMG2-EMG1 active travel link

4.9 The link is proposed to run on the western side of the A453. The northern section is within the SRN boundary and follows a former alignment of the A453, it runs close to the end of the EMA runway.

4.10 The southern section is outside of but adjacent to the A453, and the very southern end again runs on part of a former alignment of the A453.

A453 Finger Farm roundabout

STAGE 1 ROAD SAFETY AUDIT BRIEF

EMG2 HIGHWAY WORKS

EMG2-BWB-GEN-XX-RP-CH-0016



- 4.11 The Finger Farm roundabout connects the A453 to the M1 at J23A and the A42 and also provides access to Donington Services. There is extant permission for a small development on land east of this junction, west of the M1.

A453 / EMG2 site access junction

- 4.12 This is an existing roundabout that will be improved to provide access to EMG2. It presently serves the Pegasus Business Park to the north and Hunter Road also links into EMA.

A453 / East Midlands Airport junction

- 4.13 The existing junction is signalised but does not have any facilities for pedestrians and cyclists.

Hyam's Lane and Long Holden

- 4.14 These are both single track rural lanes which have an unbound surface. Both are 'dead ends' and serve adjacent land with connections into the wider public rights of way network.

Footpath L57

- 4.15 Footpath L57 connects Castle Donington and the EMG1 site and is currently a typical public footpath in a field. It is proposed to upgrade this to a cycle track for use by pedestrians and cyclists.

Factors that may affect road safety

- 4.16 The following table sets out any other factors that could affect road safety and also identifies if there are nearby schools, care homes or hospitals.

Component	Any factors that could affect road safety	Presence of schools, hospitals or care homes in the immediate vicinity
M1 Northbound	'Smart' motorway with variable mandatory speed limits, hard shoulder only present in part Queuing back onto the M1 mainline reported from the J24 exit	None
M1 Junction 24	Nothing of significant note	None
A50 westbound exit from J24	The 2-1 merge on the exit appears to result in some collisions	None
A50 eastbound / M1 southbound link to J24	Queuing back onto this link is reported from the J24 exit	None
A453 / A6 / EMG1 site access junction	Potential issue with existing signals, see PIC report	None
EMG2-EMG1 active travel link	Close to the end of the Airport runway	None
A453 Finger Farm roundabout	Close to the Airport Access junction to Donington Services	None
A453 / EMG2 site access junction	Close to the Airport Close to Donington Services	None
A453 / East Midlands Airport junction	Junction serves the Airport and will therefore be used by visitors to the East Midlands and UK	None

STAGE 1 ROAD SAFETY AUDIT BRIEF

EMG2 HIGHWAY WORKS

EMG2-BWB-GEN-XX-RP-CH-0016



Component	Any factors that could affect road safety	Presence of schools, hospitals or care homes in the immediate vicinity
Hyam's Lane	Nothing of significant note	Diseworth Primary School at western end of Hyam's Lane
Long Holden	Nothing of significant note	None
Footpath L57	Runs alongside playing fields	Near Castle Donington College

5 ANALYSIS

Personal Injury Collision (PIC) Data

- 5.1 Refer to the Highway Safety Position Statement which includes detailed analysis of PICs throughout the scheme.

Departures and Relaxations from Standards

- 5.2 To date the following departures from geometry standards have been identified for the scheme. These are yet to be submitted and approved:

Component	Departures from geometry standards identified at this design stage
M1 Northbound	Departures from standard have been identified with respect to the northbound weaving length (from J23A), the number of lanes in the weaving section, spacing of successive diverges, layout of new A50 diverge, the visibility into the new A50 diverge and positions of signs and signals.
M1NB-A50WB interchange link	Departures from standard have been identified with respect to the cross-section being a single lane, a reduction in crest K below desirable minimum, reducing the bridge clearance over the A453 by 2 feet (as it is an 18' high load route not a 20' route; note clearance will be in excess of the minimum for a standard route)
M1 J24-A50WB interchange link	Departures from standard have been identified with the A50 westbound merge with the visibility on the A50 exit from the J24 roundabout being below desirable minimum and the provision of a lane drop
M1 Junction 24	Departures from standard have been identified with the M1 J24 NB exit slip and entry path curvature onto the roundabout
A453 / A6 / EMG1 site access junction	None envisaged
EMG1-EMG2 active travel link	Set back from carriageway less than 1.5m in specific locations
A453 / EMG2 site access junction	Lane width in excess of 4.5m on EMG2 exit due to swept path
A453 / East Midlands Airport junction	Lane width in excess of 4.5m on EMG2 exit due to swept path
Hyam's Lane	None envisaged
Long Holden	None envisaged
L57 footpath upgrade	Gradients in excess of 7% for approximately 50m

- 5.3 Further details on the geometric design for the SRN is provided in the design strategy record document EMG2-BWB-GEN-XX-RP-CH-0013, and for the LRN is provided in EMG2-BWB-GEN-XX-RP-CH-0017.

STAGE 1 ROAD SAFETY AUDIT BRIEF

EMG2 HIGHWAY WORKS

EMG2-BWB-GEN-XX-RP-CH-0016



Previous Road Safety Audits

5.4 No previous RSAs undertaken to date.

Strategic decisions

5.5 The operating regime for the M1 northbound will remain as a smart motorway (with amendments to hard shoulder provision as set out on the design drawings).

List of documents and drawings provided with this Brief

5.6 The following information is provided in addition to this Audit Brief and can be found with the Audit Information in the location listed above:

Document / Drawing / Model	Title	Revision
EMG2-BWB-GEN-XX-SK-CH-SK042	Highway Works overview for RSA1 brief	P02
EMG2-BWB-GEN-XX-RP-CH-0013	Design strategy record SRN	P04
EMG2-BWB-GEN-XX-RP-CH-0017	Design strategy record LRN	P02
EMG2-BWB-GEN-XX-RP-TR-0015	Highway Safety Position Statement	P01
EMG2-BWB-GEN-XX-RP-TR-0005	WCHAR Assessment	P06
EMG2-BWB-LSI-01-DR-C-0190	Speed limit plan	P03
EMG2-BWB-HGN-A453-DR-H-0101	A453 Geometry Plans Sheet 1 of 4	P02
EMG2-BWB-HGN-A453-DR-H-0102	A453 Geometry Plans Sheet 2 of 4	P02
EMG2-BWB-HGN-A453-DR-H-0103	A453 Geometry Plans Sheet 3 of 4	P02
EMG2-BWB-HGN-A453-DR-H-0104	A453 Geometry Plans Sheet 4 of 4	P02
EMG2-BWB-HGN-A453-DR-H-0110	A453 Vehicle Swept Paths & Visibility Sheet 1 of 4	P03
EMG2-BWB-HGN-A453-DR-H-0111	A453 Vehicle Swept Paths & Visibility Sheet 2 of 4	P02
EMG2-BWB-HGN-A453-DR-H-0112	A453 Vehicle Swept Paths & Visibility Sheet 3 of 4	P01
EMG2-BWB-HGN-A453-DR-H-0113	A453 Vehicle Swept Paths & Visibility Sheet 4 of 4	P01
EMG2-BWB-HGT-A453-DR-H-0651	EMG2 Highway Plans Long Sections Sheet 3	P03
EMG2-BWB-HGN-HYAM-DR-H-0101	Hyam Geometry Plans Sheet 1 of 2	P01
EMG2-BWB-HGN-HYAM-DR-H-0102	Hyam Geometry Plans Sheet 2 of 2	P02
EMG2-BWB-HGN-HYAM-DR-H-0110	Hyam Vehicle Swept Paths & Visibility Sheet 1 of 2	P01
EMG2-BWB-HGN-HYAM-DR-H-0111	Hyam Vehicle Swept Paths & Visibility Sheet 2 of 2	P01
EMG2-BWB-HGT-HYAM-DR-H-0651	EMG2 Highway Plans Long Sections Sheet 4	P04
EMG2-BWB-HGN-M1NBS-DR-H-0101	M1 Northbound Slip Road Geometry Plans Sheet 1 of 4	P01
EMG2-BWB-HGN-M1NBS-DR-H-0102	M1 Northbound Slip Road Geometry Plans Sheet 2 of 4	P01
EMG2-BWB-HGN-M1NBS-DR-H-0103	M1 Northbound Slip Road Geometry Plans Sheet 3 of 4	P01
EMG2-BWB-HGN-M1NBS-DR-H-0104	M1 Northbound Slip Road Geometry Plans Sheet 4 of 4	P01
EMG2-BWB-HGN-M1NBS-DR-H-0110	M1 Northbound Offslip Vehicle Swept Paths & Visibility Sheet 1 of 4	P01
EMG2-BWB-HGN-M1NBS-DR-H-0111	M1 Northbound Offslip Vehicle Swept Paths & Visibility Sheet 2 of 4	P01
EMG2-BWB-HGN-M1NBS-DR-H-0112	M1 Northbound Offslip Vehicle Swept Paths & Visibility Sheet 3 of 4	P01

STAGE 1 ROAD SAFETY AUDIT BRIEF

EMG2 HIGHWAY WORKS

EMG2-BWB-GEN-XX-RP-CH-0016



Document / Drawing / Model	Title	Revision
EMG2-BWB-HGN-M1NBS-DR-H-0113	M1 Northbound Offslip Vehicle Swept Paths & Visibility Sheet 4 of 4	P01
EMG2-BWB-HGN-A50WB-DR-H-0101	A50 Westbound Geometry Plans Sheet 1 of 2	P01
EMG2-BWB-HGN-A50WB-DR-H-0102	A50 Westbound Geometry Plans Sheet 2 of 2	P01
EMG2-BWB-HGT-M1NBS-DR-H-0651	EMG2 Highway Plans Long Sections Sheet 1	P03
EMG2-BWB-HGN-A50EB-DR-H-0101	A50 Eastbound Geometry Plans Sheet 1 of 2	P01
EMG2-BWB-HGN-A50EB-DR-H-0102	A50 Eastbound Geometry Plans Sheet 2 of 2	P01
EMG2-BWB-HGT-A50EB-DR-H-0651	EMG2 Highway Plans Long Sections Sheet 2	P04
EMG2-BWB-HGN-EMG1-DR-H-0101	Existing EMG1 Junction Geometry Plan	P01
EMG2-BWB-GEN-XX-SK-CH-SK038	Existing EMG1 Junction Vehicle Tracking	P01
EMG2-BWB-GEN-XX-SK-CH-SK012	L57 Upgrade to Cycle Track GA & Profile	P03
EMG2-BWB-HSN-ZZ-DR-CH-1200	Directional Sign Strategy Sheet 1 of 2	P02
EMG2-BWB-HSN-ZZ-DR-CH-1201	Directional Sign Strategy Sheet 2 of 2	P02
EMG2-BWB-HLG-ZZ-DR-CH-1300	EMG2 Lighting Strategy SRN	P02
EMG2-BWB-HLG-ZZ-DR-CH-1301	EMG2 Lighting Strategy LCC Network	P02

6 CHECKLIST

Item	Location	Item	Location
Site location plan	Within brief	Scale layout plans	See Audit information
Departures and relaxations from standards	Within brief	Construction/ typical details	N/A
Previous RSA reports	None	Previous RSA response reports and evidence of agreed actions	None
Collision data and collision data analysis	See Audit information	Road traffic collision plot	See Audit information
Traffic signal staging	See Audit information	Traffic counts	See Audit information
Speed surveys	See Audit information	Pedestrian, cyclist and horse riding desire lines and volumes	Within brief and Audit information
Walking, cycling and horse riding assessment and reviews	Within brief and Audit information	Items outside the scope of the RSA/ strategic decisions	Within brief
Other factors that may impact on road safety	Within brief	Design speeds/ speed limits	Within brief
Design standards used	Within brief	Adjacent land uses	Within brief

Simon Hilditch

From: Adrian Whiteman <Adrian.Whiteman@leics.gov.uk>
Sent: 17 November 2025 15:43
To: Simon Hilditch
Cc: Harry Horsley
Subject: RE: EMG2: Stage 1 RSA audit brief

This email originated from outside of our organisation. Please exercise caution with content, links and attachments.

Thanks Simon; much appreciated.

From: Simon Hilditch <Simon.Hilditch@bwbconsulting.com>
Sent: 17 November 2025 15:39
To: Adrian Whiteman <Adrian.Whiteman@leics.gov.uk>
Cc: Ian Rigby <ian.rigby@segro.com>; Paul Wilson <Paul.Wilson@bwbconsulting.com>; Matt Corner <Matt.Corner@bwbconsulting.com>; Kate Stephen <Kate.Stephen@nationalhighways.co.uk>; Jeremy Bloom <consulting@jeremybloom.co.uk>; Ahmed, Fiona <Fiona.Ahmed@jacobs.com>; Nock, George <George.Nock@jacobs.com>; Harry Horsley <Harry.Horsley@leics.gov.uk>
Subject: RE: EMG2: Stage 1 RSA audit brief

Many thanks Adrian

I can confirm that in relation to the first point, neither of the proposed Audit Team members have been involved in the EMG2 scheme. For information AJ was an Audit Team member for the EMG1 scheme which gives him a good long term knowledge of this area.

I can also confirm your second point is understood and accepted.

Best regards

Simon

Simon Hilditch

Director (Infrastructure Design) | BWB Consulting Limited
5th Floor, Waterfront House, Station Street, Nottingham, NG2 3DQ
M 07917 578775 **T** 0115 9241100 **W** www.bwbconsulting.com

From: Adrian Whiteman <Adrian.Whiteman@leics.gov.uk>
Sent: 17 November 2025 15:18
To: Simon Hilditch <Simon.Hilditch@bwbconsulting.com>
Cc: Ian Rigby <ian.rigby@segro.com>; Paul Wilson <Paul.Wilson@bwbconsulting.com>; Matt Corner <Matt.Corner@bwbconsulting.com>; Kate Stephen <Kate.Stephen@nationalhighways.co.uk>; Jeremy Bloom <consulting@jeremybloom.co.uk>; Ahmed, Fiona <Fiona.Ahmed@jacobs.com>; Nock, George <George.Nock@jacobs.com>; Harry Horsley <Harry.Horsley@leics.gov.uk>
Subject: RE: EMG2: Stage 1 RSA audit brief

This email originated from outside of our organisation. Please exercise caution with content, links and attachments.

Hi Simon,

Thank you for your email dated 13 November 2025. I can confirm on behalf of LCC Highway Development Management (HDM) that the RSA1 brief and CVs are acceptable, subject to:

- Confirmation that the BWB colleagues performing the audit are not part of the design team (I would be grateful if you could confirm this by email); and

- That a revised or addendum audit would be required if material changes are made to the schemes are made to, for example, accommodate the result of traffic modelling.

I trust that the above points are helpful and I look forward to hearing from you in due course.

Regards,

Adrian

Adrian Whiteman

Principal Transport Planner (Strategic Sites) - Highway Development Management
Leicestershire County Council

****Please note that the contents of this email including any attachments are offered as my officer opinion and will not prejudice any future decision the Highway Authority may make in relation to this matter****

From: Simon Hilditch <Simon.Hilditch@bwbconsulting.com>

Sent: 13 November 2025 18:10

To: Harry Horsley <Harry.Horsley@leics.gov.uk>; Ahmed, Fiona <Fiona.Ahmed@jacobs.com>; Jeremy Bloom <consulting@jeremybloom.co.uk>; Kate Stephen <Kate.Stephen@nationalhighways.co.uk>

Cc: Ian Rigby <ian.rigby@segro.com>; Paul Wilson <Paul.Wilson@bwbconsulting.com>; Matt Corner <Matt.Corner@bwbconsulting.com>; Nock, George <George.Nock@jacobs.com>; Adrian Whiteman <Adrian.Whiteman@leics.gov.uk>

Subject: EMG2: Stage 1 RSA audit brief

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Harry and Jeremy / Kate

Further to the discussion at the TWG today please find attached the Stage 1 RSA brief and Audit Team CVs for your approval.

As previously stated we accept that the Stage 1 RSA done now is based on the highway design as it stands, and if the design does change as a result of the finalisation of the modelling then an addendum Stage 1 RSA may be necessary.

I should therefore be grateful if you would confirm agreement to the Stage 1 RSA Audit Brief (which I fully accept can be caveated on the above basis) and Audit Team.

I look forward to hearing from you

Best regards

Simon

Simon Hilditch

Director (Infrastructure Design) | BWB Consulting Limited
5th Floor, Waterfront House, Station Street, Nottingham, NG2 3DQ
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Simon Hilditch

From: Jeremy Bloom <consulting@jeremybloom.co.uk>
Sent: 19 November 2025 10:00
To: Simon Hilditch; Harry Horsley; Ahmed, Fiona; Kate Stephen
Cc: Ian Rigby; Paul Wilson; Matt Corner; Nock, George; Adrian Whiteman
Subject: Re: EMG2: Stage 1 RSA audit brief

This email originated from outside of our organisation. Please exercise caution with content, links and attachments.

Hi Simon

National Highways have reviewed the RSA 1 brief and we are content for you to proceed with the RSA, noting that the modelling is still to be signed off by Jacobs and the departures need to be approved, so there is a risk that there may need to be some rework. Notwithstanding this point, we are content with the brief and are happy for you to proceed.

Kind regards

Jeremy

Jeremy Bloom
Interim Spatial Planner
Operations Midlands
National Highways

From: Simon Hilditch <Simon.Hilditch@bwbconsulting.com>
Sent: 13 November 2025 18:09
To: Harry Horsley <Harry.Horsley@leics.gov.uk>; Ahmed, Fiona <Fiona.Ahmed@jacobs.com>; Jeremy Bloom <consulting@jeremybloom.co.uk>; Kate Stephen <Kate.Stephen@nationalhighways.co.uk>
Cc: Ian Rigby <ian.rigby@segro.com>; Paul Wilson <Paul.Wilson@bwbconsulting.com>; Matt Corner <Matt.Corner@bwbconsulting.com>; Nock, George <George.Nock@jacobs.com>; Adrian Whiteman <Adrian.Whiteman@leics.gov.uk>
Subject: EMG2: Stage 1 RSA audit brief

Hi Harry and Jeremy / Kate

Further to the discussion at the TWG today please find attached the Stage 1 RSA brief and Audit Team CVs for your approval.

As previously stated we accept that the Stage 1 RSA done now is based on the highway design as it stands, and if the design does change as a result of the finalisation of the modelling then an addendum Stage 1 RSA may be necessary.

I should therefore be grateful if you would confirm agreement to the Stage 1 RSA Audit Brief (which I fully accept can be caveated on the above basis) and Audit Team.

I look forward to hearing from you

Best regards

Simon

ANNEX 19B

Simon Hilditch

From: AJ Oakes
Sent: 09 June 2026 15:22
To: Simon Hilditch; Naomi Cook
Cc: Paul Wilson
Subject: RE: EMG2 Stage 1 RSA: A453 Bridge

Simon,

Thank you for sending over the A453 Bridge Plan providing further details of the bridge itself.

As we stated in the introduction of the Audit Report:

“It should be noted that no details have been provided to the Audit Team in terms of the structure of the bridge provided on the new A50 link over the A453. As a result, the bridge itself has not been considered as part of this Stage 1 Road Safety Audit.”

Had we received the drawing EMG2-CH-SBR-BR-DR-CB-00024 in the initial Audit pack, we would not have included for the above paragraph in the report, as the drawing provides us with the detail required for a Stage 1 RSA.

For clarity, the actual physical structure of the bridge itself would not be audited at this stage (RSA1). Instead an overview of the general arrangement/layout, and visibility splays would be undertaken. As you suggested, the visibility splays were shown on the M1 Northbound off-slip drawings included in the original drawing pack and were not raised as an issue over the bridge.

The drawing does provide information about the parapets and barriers which was not included in the original audit, but do not raise any concerns for the audit team at this stage, subject to the detailed design and how they connect/interface with the VRS on the embankment (if provided), would be reviewed at Stage 2 RSA.

As a result, apart from omitting paragraph 1.8 from the Stage 1 Road Safety Audit, there would be no changes to the report as a result of reviewing the A453 bridge plan.

We trust the above is of use, however if you have any questions please do not hesitate to ask.

Kind regards,

AJ Oakes MSoRSA MCIHT
Associate Director
5th Floor, Waterfront House, Station Street, Nottingham, NG2 3DQ
T: 07760 508862 | **W:** bwbconsulting.com



From: Simon Hilditch <Simon.Hilditch@bwbconsulting.com>
Sent: 03 June 2026 14:08

To: AJ Oakes <Andrew.Oakes@bwbconsulting.com>; Naomi Cook <naomi@merakialliance.co.uk>

Cc: Paul Wilson <Paul.Wilson@bwbconsulting.com>

Subject: EMG2 Stage 1 RSA: A453 Bridge

AJ, Naomi

For EMG2 the attached drawing shows the general arrangement of the bridge over the A453. This drawing wasn't included with the design information for the Stage 1 RSA. However, the highway design provided for Stage 1 RSA included the outline design of the bridge as shown on the Highway Plan GA and Longsection, and the larger scale highway drawings showed the visibility splays.

As the Audit Team for the Stage 1 RSA please can you review the attached drawing and advise, had it been included in the original Audit Information, if:

- You would have raised any additional problems
- Any of the problems previously raised would have been differently worded

I look forward to hearing from you

Best regards

Simon

Simon Hilditch

Director (Infrastructure Design) | BWB Consulting Limited
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ANNEX 19C

Simon Hilditch

From: AJ Oakes
Sent: 20 May 2026 10:52
To: Simon Hilditch
Cc: Naomi Cook; Paul Wilson; Daniel Fraser
Subject: RE: EMG2 Work 15: EMA access junction

Simon,

We did consider the principle of the uncontrolled crossing that is to be provided within the EMA signalised access junction within the Stage 1 Audit yes.

The drawing submitted to the Audit Team indicated the location of the crossing and the footpath link to the south but no details of kerbing or tactile etc were provided. We did stop at the junction and have a look at the location and the potential for an uncontrolled crossing in this location.

There appears to be plenty of visibility to and from the proposed crossing location and the principle of an uncontrolled crossing point within the signal junction at this stage seems reasonable, given that there are similar facilities provided elsewhere along the A453. It is also assumed that the demand at crossing is likely to be relatively low.

The details at this crossing (tactile provision, kerbing arrangement, staggers and visibility splays etc) would all be reviewed as part of the Stage 2 Road Safety Audit.

Hopefully the above clarifies the position at Stage 1, but if you need anything else please let us know.

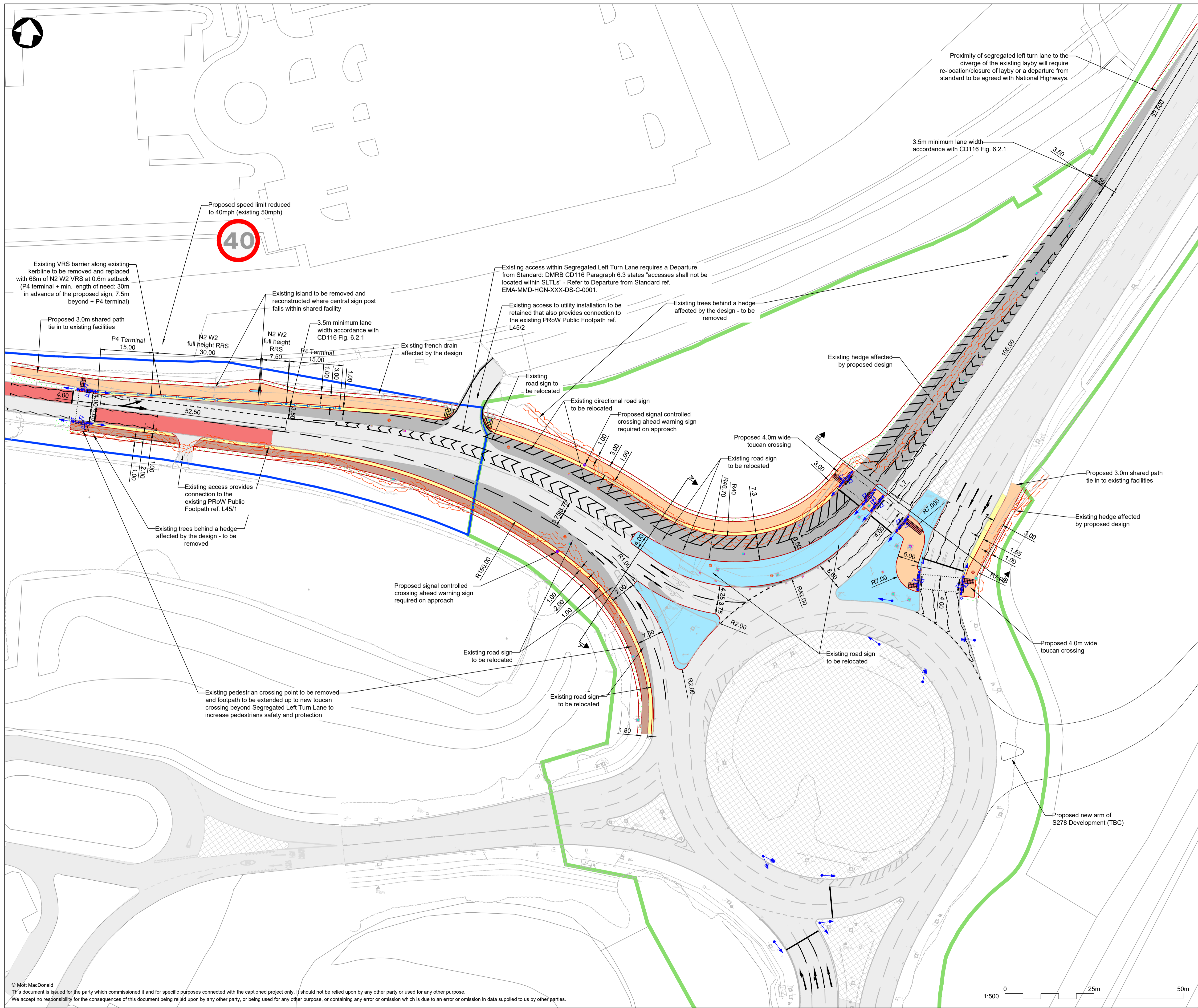
Kind regards,

AJ Oakes MSoRSA MCIHT
Associate Director
5th Floor, Waterfront House, Station Street, Nottingham, NG2 3DQ
T: 07760 508862 | **W:** bwbconsulting.com



ANNEX 19D

E. Highway Mitigation Design – Finger Farm Roundabout



Notes

- All dimensions are in metres unless stated otherwise.
- Do not scale from this drawing.
- Proposed signing strategy to be agreed with the Local Highway Authority.
- Proposed lighting strategy to be agreed with the Local Highway Authority.
- Design is based on Ordnance Survey, with commensurate degree of accuracy.

Key to symbols

Proposed Shared Use Facilities	Existing Island
Proposed Footway	Proposed Carriageway
Proposed Buffer between carriageway & footway/cycleway	Existing Carriageway
Proposed Island	Proposed Grass Verge
Proposed red coloured high friction surfacing with PSV 68+ in accordance with DMRB CD236 Table 3.7	

Proposed Road Markings

- Existing Road Markings
- Proposed Kerbline
- Buff Tactile Paving (Uncontrolled Crossing)
- Red Tactile Paving (Controlled Crossing)
- Existing Hedge Affected
- Proposed VRS Barrier
- Existing Gully to relocate
- Existing Manhole to relocate
- Existing Lamp Post to relocate
- Proposed Warning Sign
- Primary Signal Head
- Secondary Signal Head
- Toucan crossing signal

Boundaries

- National Highways Boundary
- Local Highway Authority Boundary

- Reference drawings**
- EMA-MMD-GEN-XXX-DR-C-0001 - Planning Application Location Plan
 - EMA-MMD-GEN-XXX-DR-C-0002 - Planning Application Overview
 - EMA-MMD-GEN-XXX-DR-C-0003 - Means of Access Plan
 - EMA-MMD-HGN-XXX-DR-C-0015 - Finger Farm Roundabout GA
 - EMA-MMD-HGN-XXX-DR-C-0017 - Beverley Road Crossing GA
 - EMA-MMD-HGN-XXX-DR-C-0018 - New Western Roundabout GA
 - EMA-MMD-HML-XXX-DR-C-0002 - Finger Farm Roundabout Swept Path Analysis Sheet 1 of 2
 - EMA-MMD-HML-XXX-DR-C-0003 - Beverley Road Crossing Swept Path Analysis Sheet 1 of 2
 - EMA-MMD-HML-XXX-DR-C-0004 - Finger Farm Roundabout Swept Path Analysis Sheet 2 of 2
 - EMA-MMD-HML-XXX-DR-C-0005 - Beverley Road Crossing Swept Path Analysis Sheet 2 of 2
 - EMA-MMD-HML-XXX-DR-C-0006 - New Western Roundabout Swept Path Analysis Sheet 1 of 2
 - EMA-MMD-HML-XXX-DR-C-0007 - Finger Farm Roundabout Swept Path Analysis Sheet 2 of 2
 - EMA-MMD-HML-XXX-DR-C-1001 - Finger Farm Roundabout Geometric Layout
 - EMA-MMD-HML-XXX-DR-C-1002 - Beverley Road Crossing Geometric Layout
 - EMA-MMD-HML-XXX-DR-C-1003 - New Western Roundabout Geometric Layout
 - EMA-MMD-HXS-XXX-DR-C-1001 - Indicative Cross Section Drawing Sheet 1 of 2
 - EMA-MMD-HXS-XXX-DR-C-1002 - Indicative Cross Section Drawing Sheet 2 of 2
 - EMA-MMD-HSN-XXX-DR-C-0001 - Signing Strategy

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Rev	Date	Drawn	Description	Ch'kd	App'd
P03	12/05/2026	DM	Revision following LHA comment	MW	MS
P02	21/04/2026	DM	Revision following LHA comment	MW	MS
P01	24/10/2025	PS	First Issue	MW	MS

MOTT MACDONALD

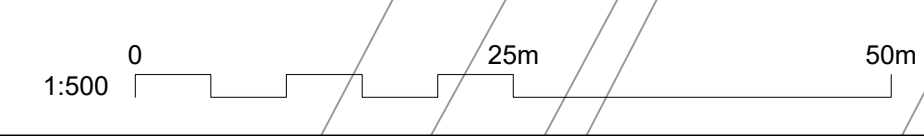
Mott MacDonald House
8-10 Sydenham Road
Croydon, CR0 2EE
United Kingdom

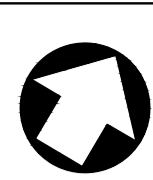
T +44 (0)20 8774 2000
F +44 (0)20 8681 5706
W mottmac.com

Client
Manchester Airport Group Limited
Prologis

Title
Land South of A453
East Midlands Airport
Proposed Layout of
Finger Farm Roundabout

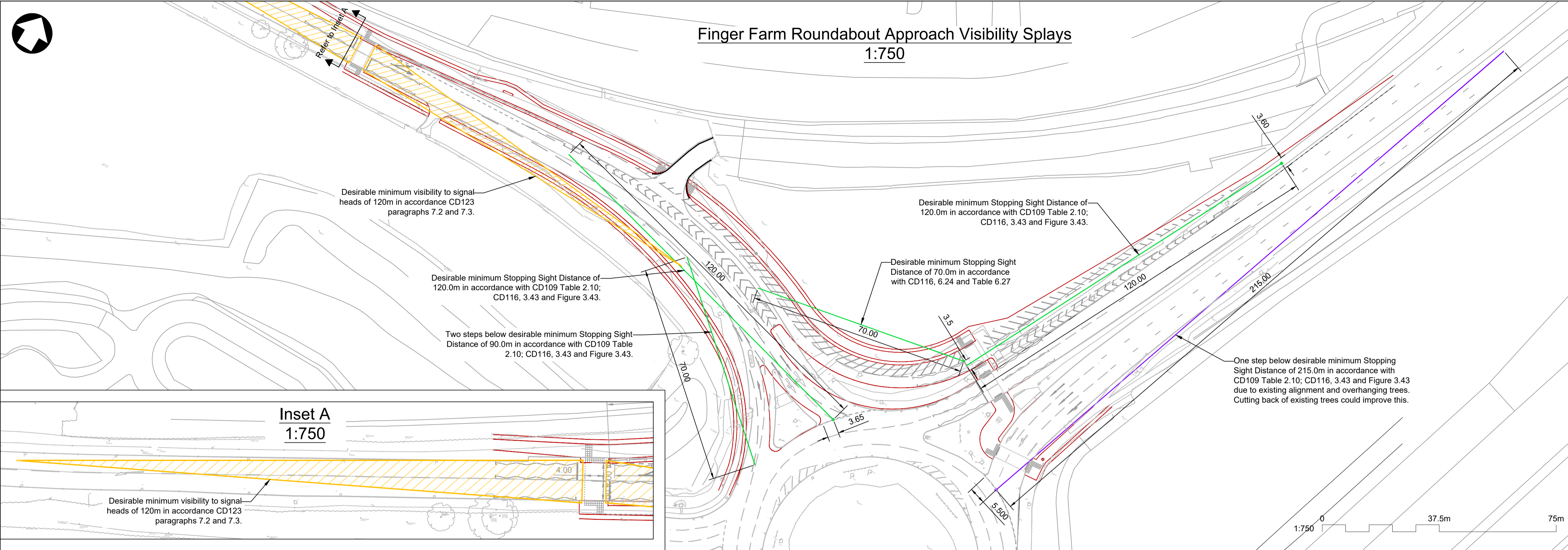
Designed	P Saja	PS	Eng check	M Williamson	MW
Drawn	P Saja	PS	Coordination	M J Taylor	MJT
Dwg check	M Williamson	MW	Approved	M Staniland	MS
Scale at A1	Status	Rev	Security		
1:500	PRE	P03	STD		
Drawing Number EMA-MMD-HGN-XXX-DR-C-0015					





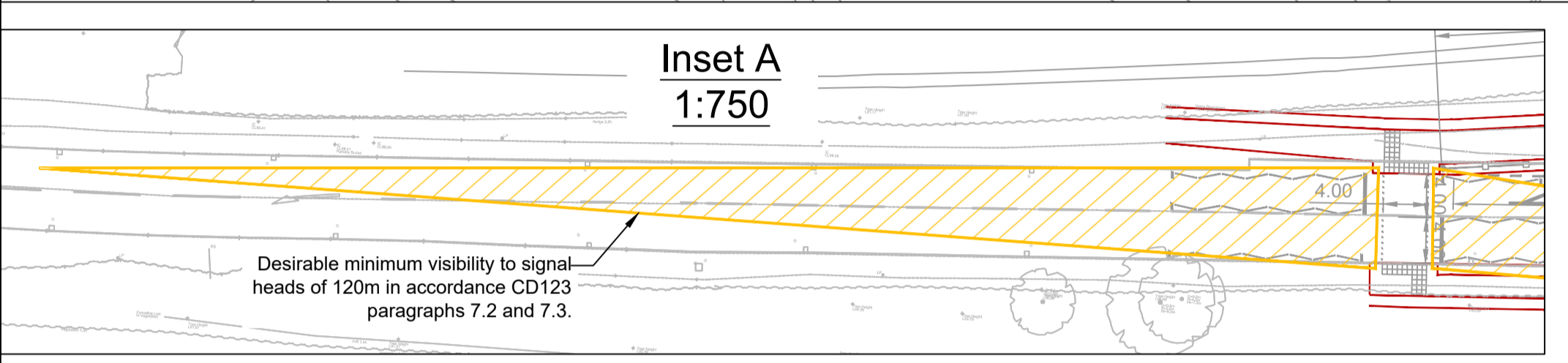
Finger Farm Roundabout Approach Visibility Splays

1:750



Inset A

1:750



- Notes
- All dimensions are in metres unless stated otherwise.
 - Do not scale from this drawing.
 - Print in colour.
 - Proposed geometry designed to Design Manual for Roads and Bridges (DMRB) CD109, CD116, CD 127, CD 143 and LTN 1/20.

Key to symbols

- Proposed Kerbline
- Stopping Sight Distance for 40mph (64kmph)
- Stopping Sight Distance for 70mph (113kmph)

Reference drawings

- EMA-MMD-GEN-XXX-DR-C-0001 - Planning Application Location Plan
- EMA-MMD-GEN-XXX-DR-C-0002 - Planning Application Overview
- EMA-MMD-GEN-XXX-DR-C-0003 - Means of Access Plan
- EMA-MMD-HGN-XXX-DR-C-0015 - Finger Farm Roundabout GA
- EMA-MMD-HGN-XXX-DR-C-0017 - Beverley Road Crossing GA
- EMA-MMD-HGN-XXX-DR-C-0018 - New Western Roundabout GA
- EMA-MMD-HML-XXX-DR-C-0002 - Finger Farm Roundabout Swept Path Analysis Sheet 1 of 2
- EMA-MMD-HML-XXX-DR-C-0007 - Finger Farm Roundabout Swept Path Analysis Sheet 2 of 2
- EMA-MMD-HML-XXX-DR-C-0003 - Beverley Road Crossing Swept Path Analysis Sheet 1 of 2
- EMA-MMD-HML-XXX-DR-C-0008 - Beverley Road Crossing Swept Path Analysis Sheet 2 of 2
- EMA-MMD-HML-XXX-DR-C-0004 - New Western Roundabout Swept Path Analysis Sheet 1 of 2
- EMA-MMD-HML-XXX-DR-C-0009 - New Western Roundabout Swept Path Analysis Sheet 2 of 2
- EMA-MMD-HML-XXX-DR-C-1001 - Finger Farm Roundabout Geometric Layout
- EMA-MMD-HML-XXX-DR-C-1002 - Beverley Road Crossing Geometric Layout
- EMA-MMD-HML-XXX-DR-C-1003 - New Western Roundabout Geometric Layout
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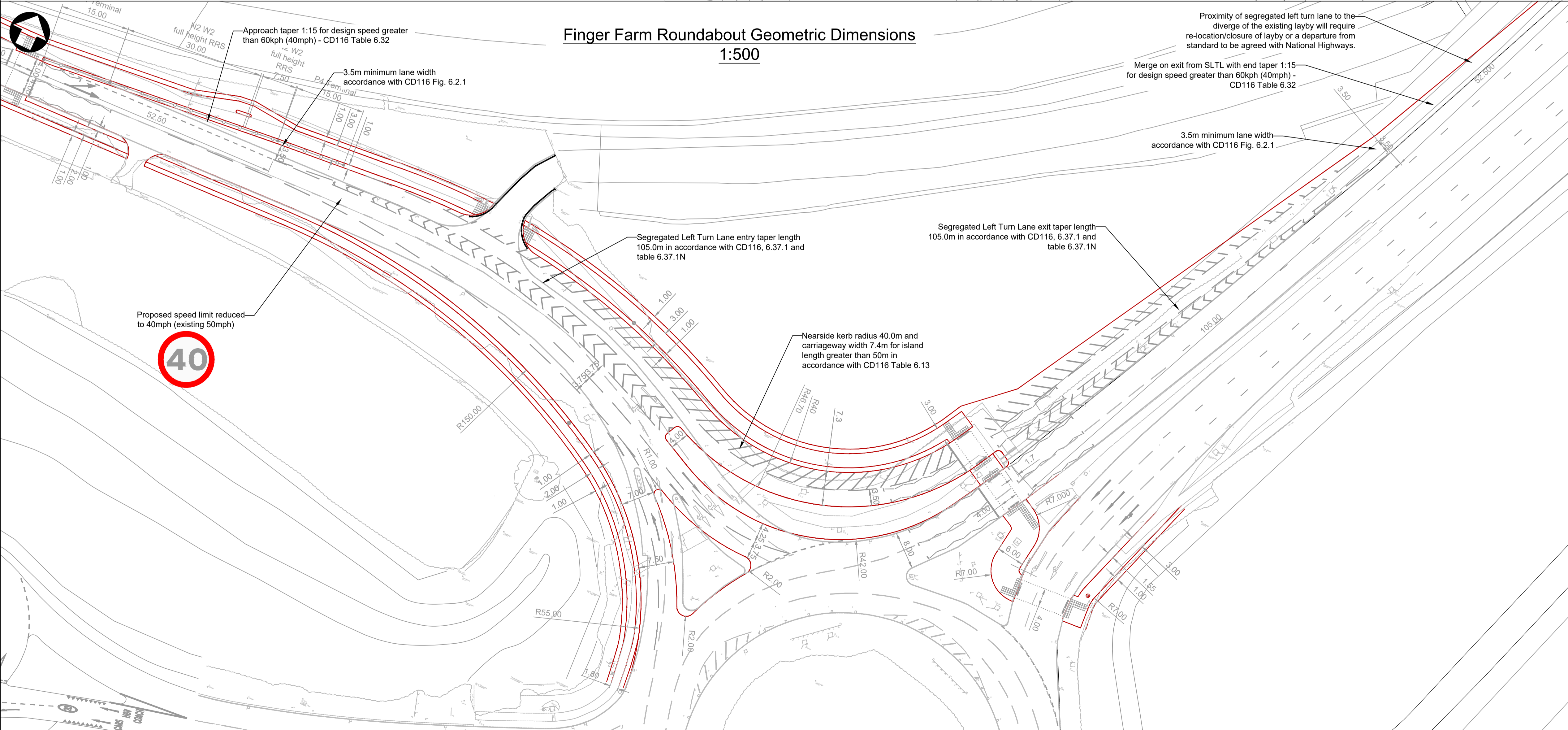
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Finger Farm Roundabout Geometric Dimensions

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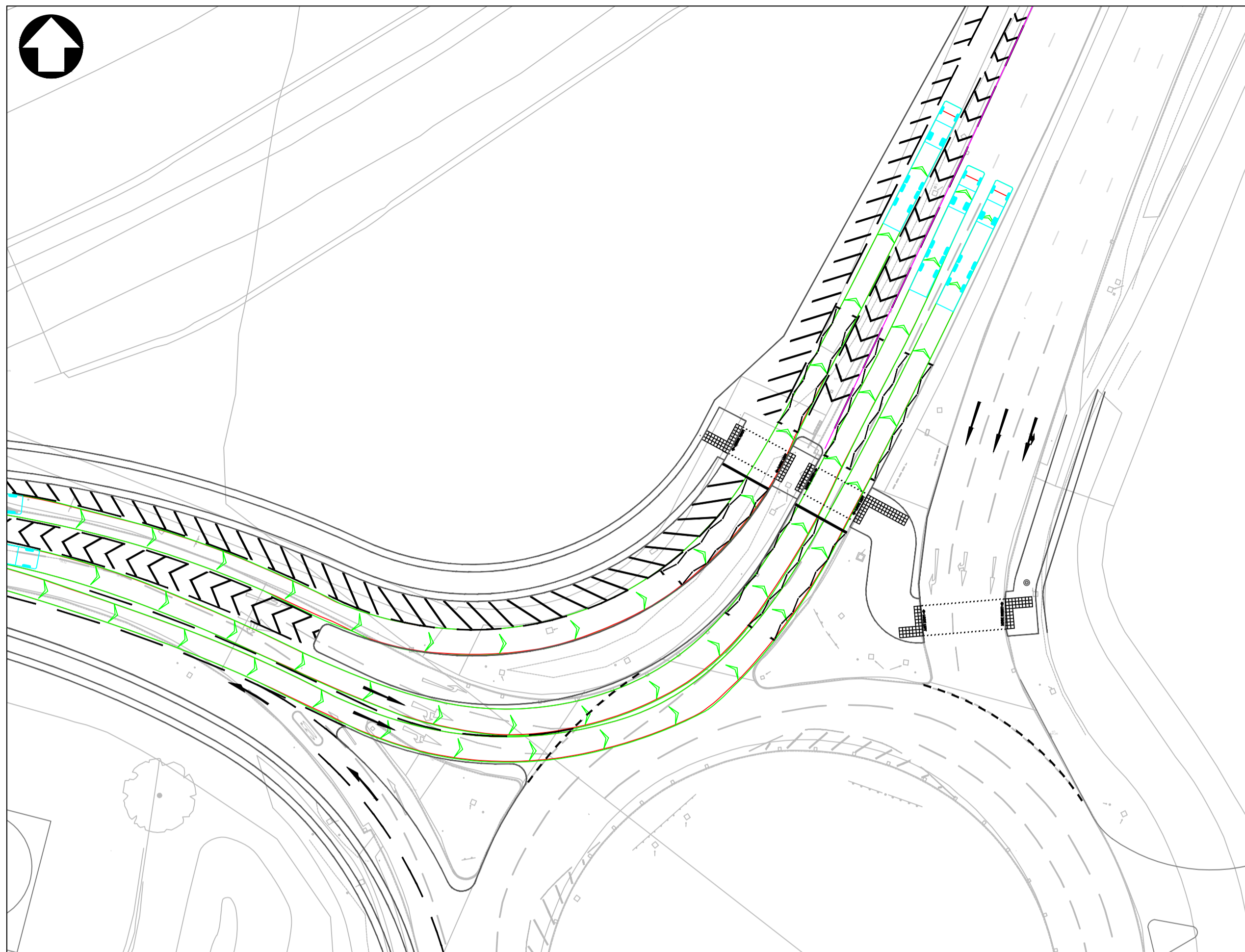
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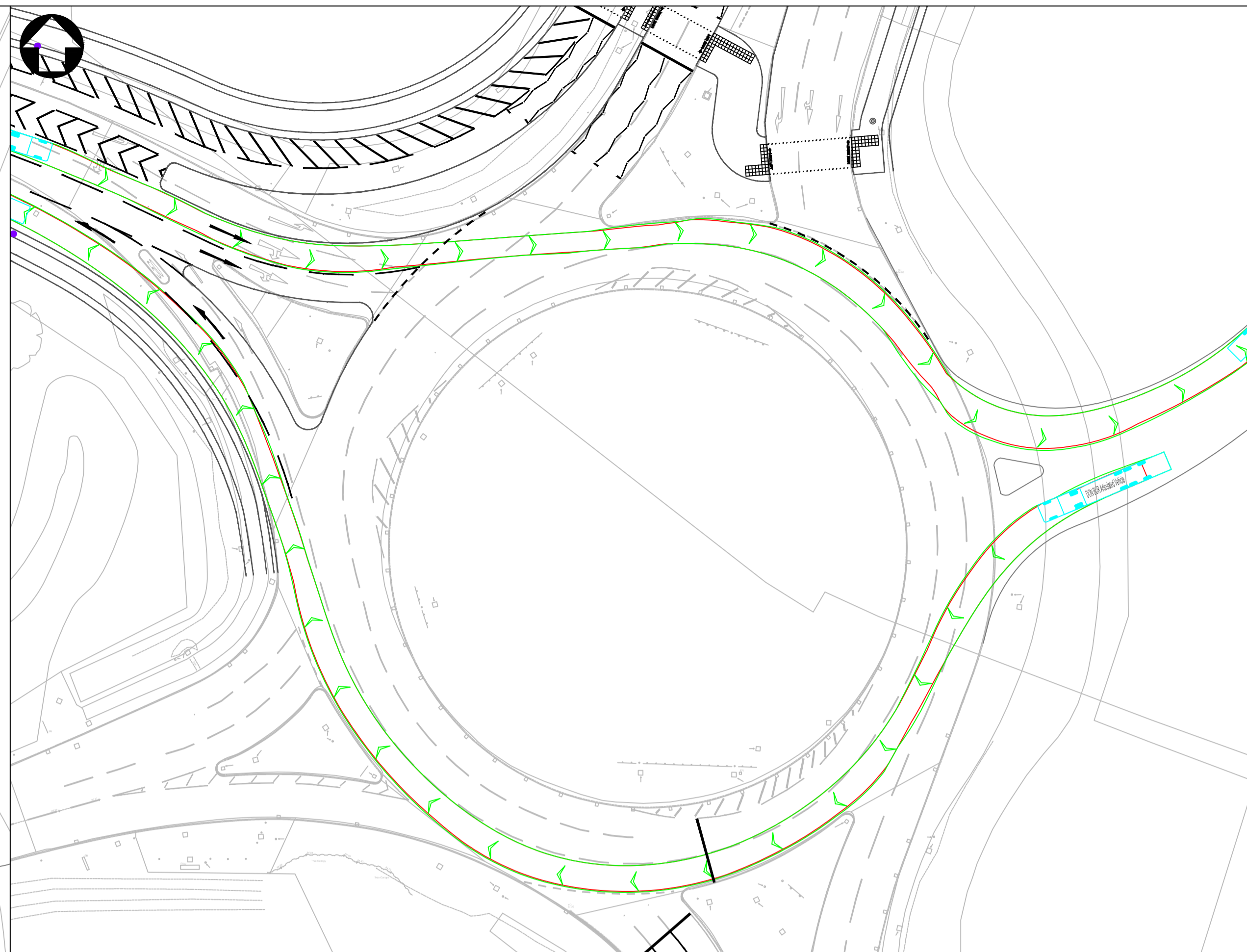
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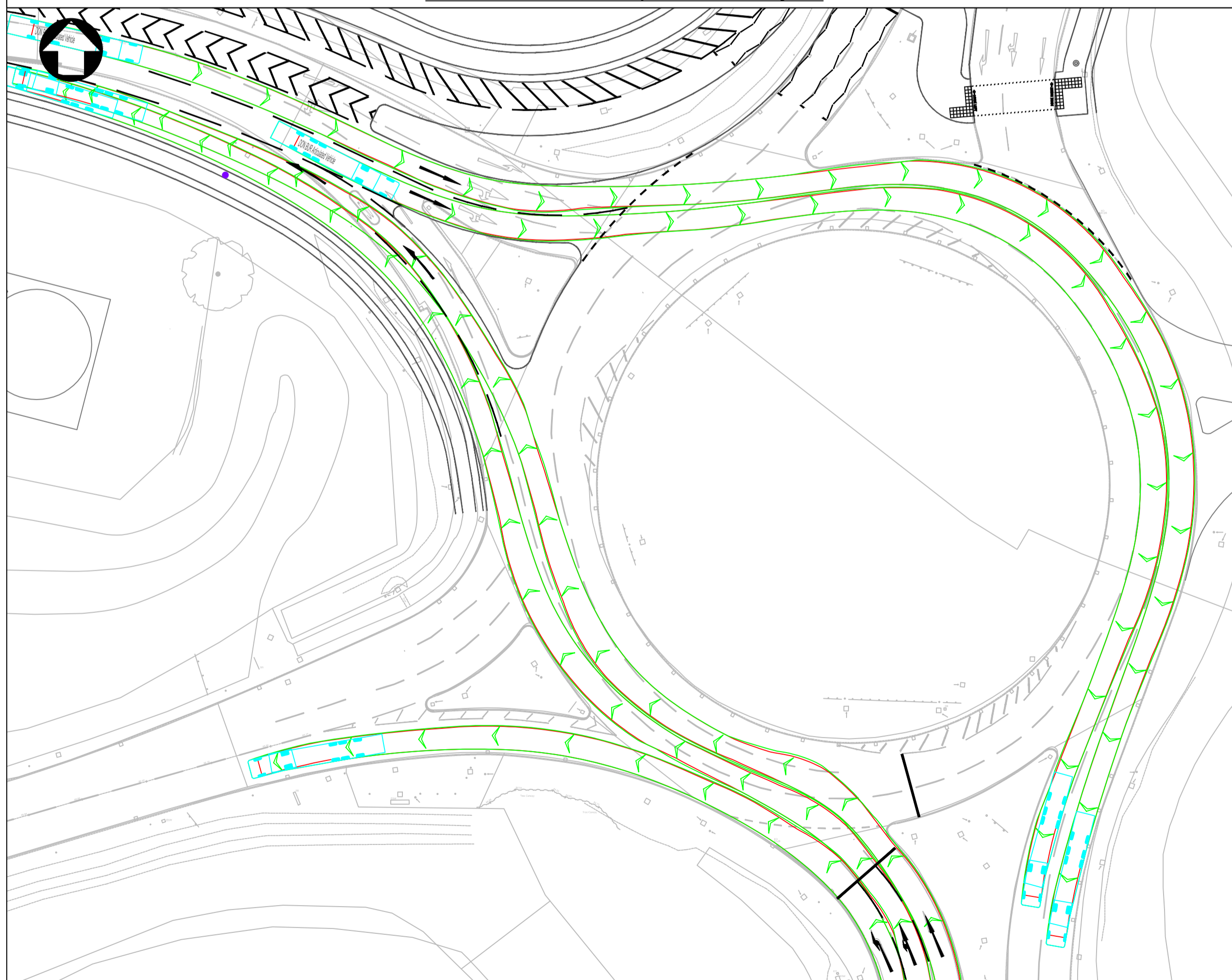
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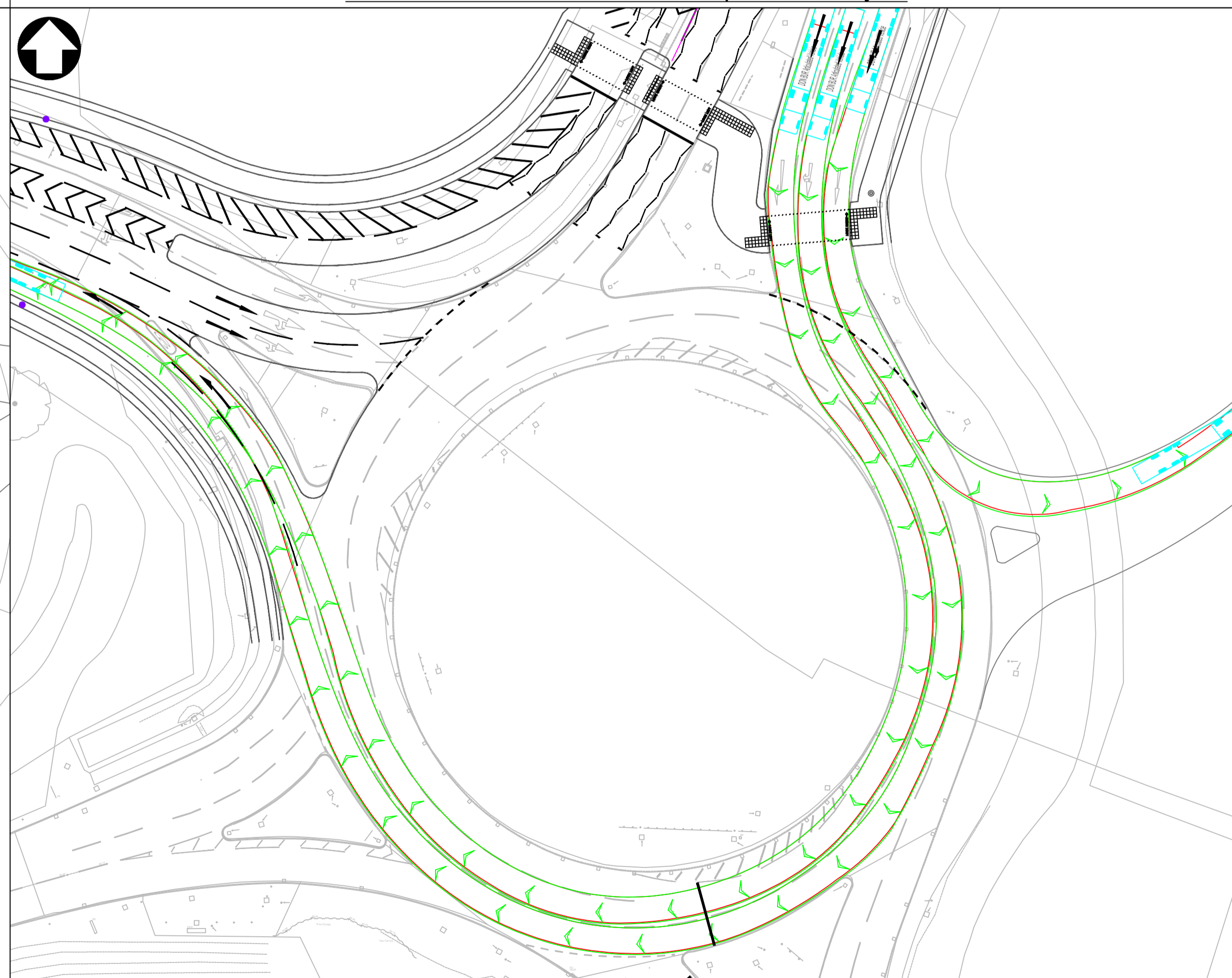
West to North Swept Path Analysis



West to East & East to West Swept Path Analysis



West to South & South to West Swept Path Analysis



North to West & North to East Swept Path Analysis

Notes

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- Print in colour.
- Vehicle used in tracking is a 18.55m Articulated Vehicle using a design speed of 15 km/h.

Key to symbols

Vehicle used in the swept path analysis

18.55m Articulated Vehicle	18.530m
Overall Length	18.530m
Overall Width	2.550m
Overall Body Height	3.870m
Min Body Ground Clearance	0.515m
Track Width	2.350m
Lock to lock time	3.00s
Kerb to Kerb Turning Radius	6.600m

— Wheel Tracks
— Body Overhang
 Body Outline

Reference drawings

EMA-MMD-GEN-XXX-DR-C-0001 - Planning Application Location Plan
 EMA-MMD-GEN-XXX-DR-C-0002 - Planning Application Overview
 EMA-MMD-GEN-XXX-DR-C-0003 - Means of Access Plan
 EMA-MMD-HGN-XXX-DR-C-0015 - Finger Farm Roundabout GA
 EMA-MMD-HGN-XXX-DR-C-0017 - Beverley Road Crossing GA
 EMA-MMD-HGN-XXX-DR-C-0018 - New Western Roundabout GA
 EMA-MMD-HML-XXX-DR-C-0002 - Finger Farm Roundabout Swept Path Analysis Sheet 1 of 2
 EMA-MMD-HML-XXX-DR-C-0007 - Finger Farm Roundabout Swept Path Analysis Sheet 2 of 2
 EMA-MMD-HML-XXX-DR-C-0003 - Beverley Road Crossing Swept Path Analysis Sheet 1 of 2
 EMA-MMD-HML-XXX-DR-C-0008 - Beverley Road Crossing Swept Path Analysis Sheet 2 of 2
 EMA-MMD-HML-XXX-DR-C-0004 - New Western Roundabout Swept Path Analysis Sheet 1 of 2
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Client
Manchester Airport Group Limited
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Title
Land South of A453
East Midlands Airport
Finger Farm Roundabout
Swept Path Analysis
Sheet 1 of 2

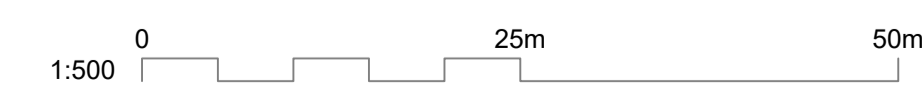
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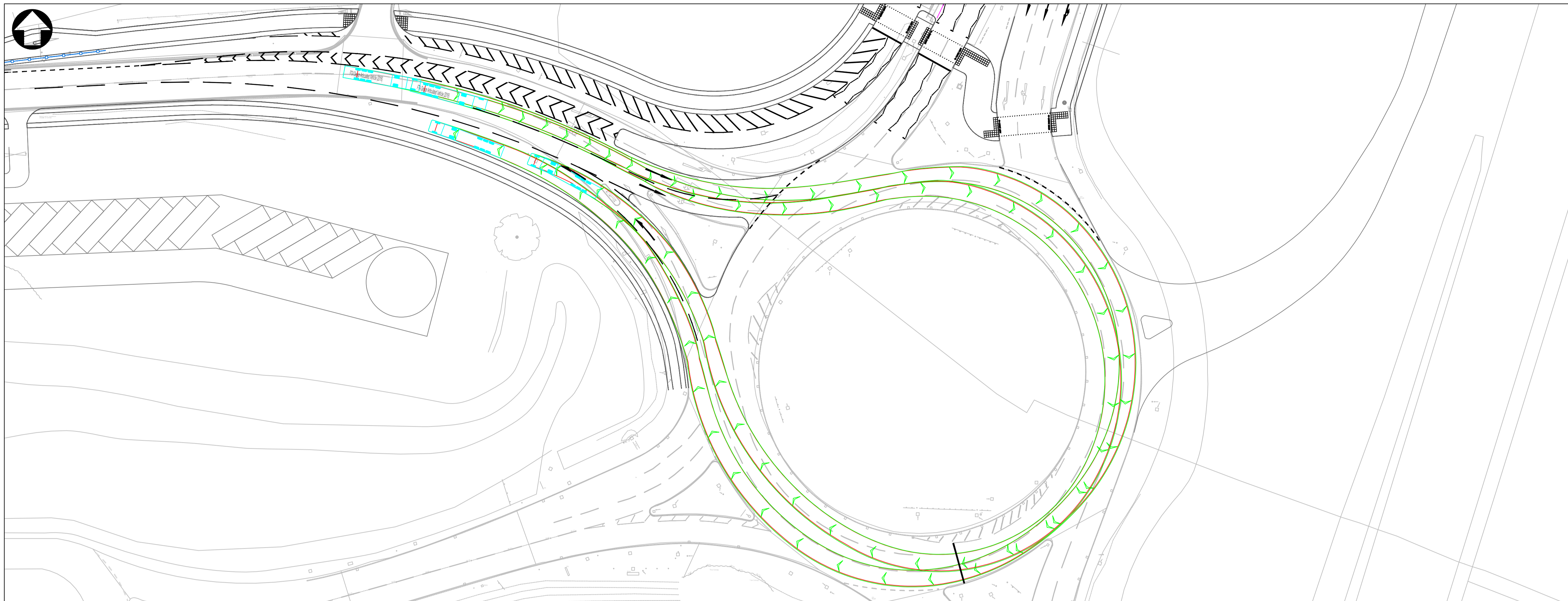
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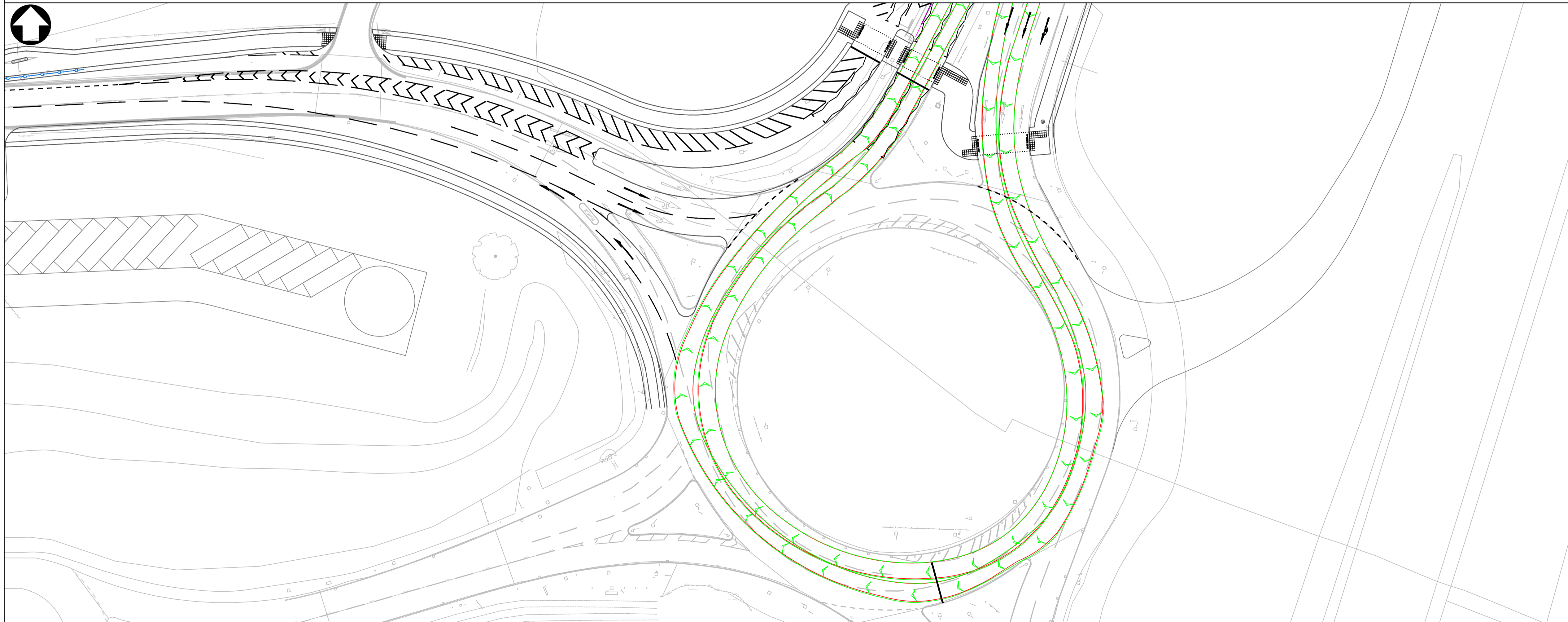
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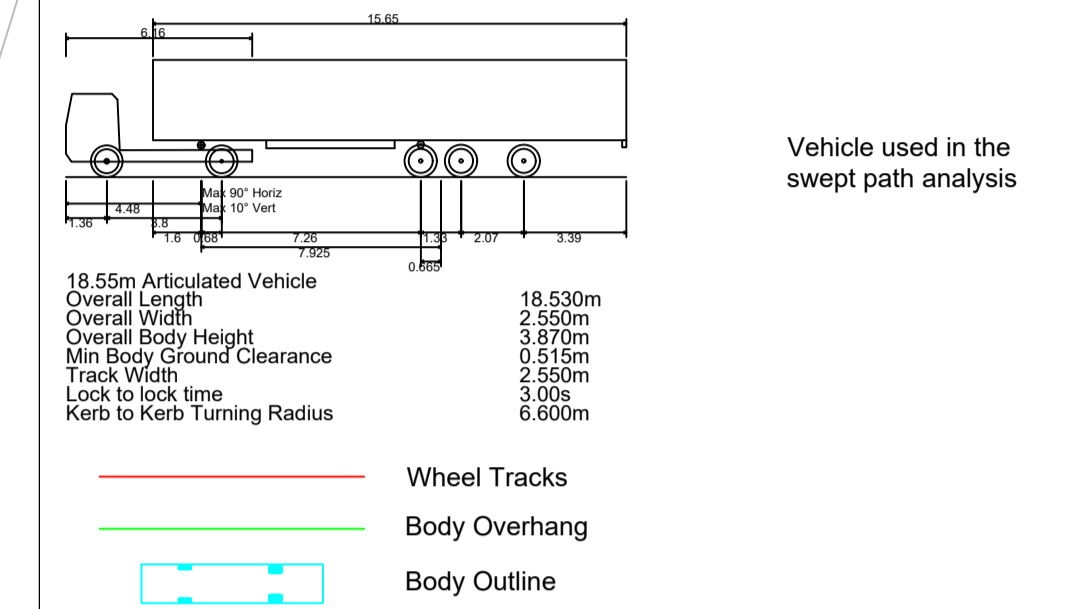
West to West Swept Path Analysis



North to North Swept Path Analysis

- Notes
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 3. Vehicle used in tracking is a 18.55m Articulated Vehicle using a design speed of 15 km/h.

Key to symbols



- Reference drawings
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Client
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Title
**Land South of A453
East Midlands Airport
Finger Farm Roundabout
Swept Path Analysis
Sheet 2 of 2**

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Drawn	D Mishra	PS	Coordination	M J Taylor	MJT
Dwg check	C Ma	MW	Approved	M Staniland	MS

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ANNEX 19E



Lorry Parking Demand Assessment

National Highways

September 2023

Quality information

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Revision History

Revision	Revision date	Details	Authorized	Name	Position
V2	01/05/2024	Amendments	PD	Jack Chawner	Consultant
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Executive Summary

This report has been developed to provide National Highways with an assessment of lorry parking demand on or close to the Strategic Road Network (SRN). The Department for Transport (DfT) tasked National Highways with the evaluation of lorry parking facilities and identification of areas experiencing high demand and insufficient provision. Having enough lorry parking and rest areas near the SRN (within approximately 5 kilometres) is important for National Highways to meet three main goals: Safety, Customer Service, and Delivery.

The 2022 lorry parking research study provides an accurate assessment of lorry parking provision and demand near the SRN in England. Through physical audits and a comparison with the previous study in 2017, the findings inform public bodies and help support the industry in meeting the parking and welfare needs of drivers while supporting the country's economic requirements.

Quality of Data Assurance

AECOM and DfT established a reporting and assurance mechanism that ensured that data was checked not just by the on-site teams but also by those overseeing the surveys and those responsible for data analysis. Capacity and utilisation of lorry parks, lay-bys and industrial estates were assessed against previous years and for several key routes monthly (to assess seasonal changes and corroborate findings). DfT and partners are therefore confident that this is a dataset that can be trusted, reported on and used for a variety of applications.

Lorry Parking Demand in England

Figure 0-1: Lorry Park utilisation in England demonstrates that there are significant areas of unmet demand across England, consistent with previous surveys undertaken in 2010 and 2017. In the left hand diagram, lorry parks marked with a red or black dot were nearly or completely full at the time of the audit and this has been translated into a heat map on the right.

The analysis showed that there were 4 key areas of demand:

- East and West Midlands
- South East/ East of England
- Port of Liverpool/Wider North West
- Solent to Midlands Corridor

Success factors for lorry parks include being competitively priced, whilst offering facilities that enable HGV drivers to properly rest in a safe and secure environment. Where lorry parks do not meet these requirements, they are often underutilised, even in areas of otherwise high and unmet demand.

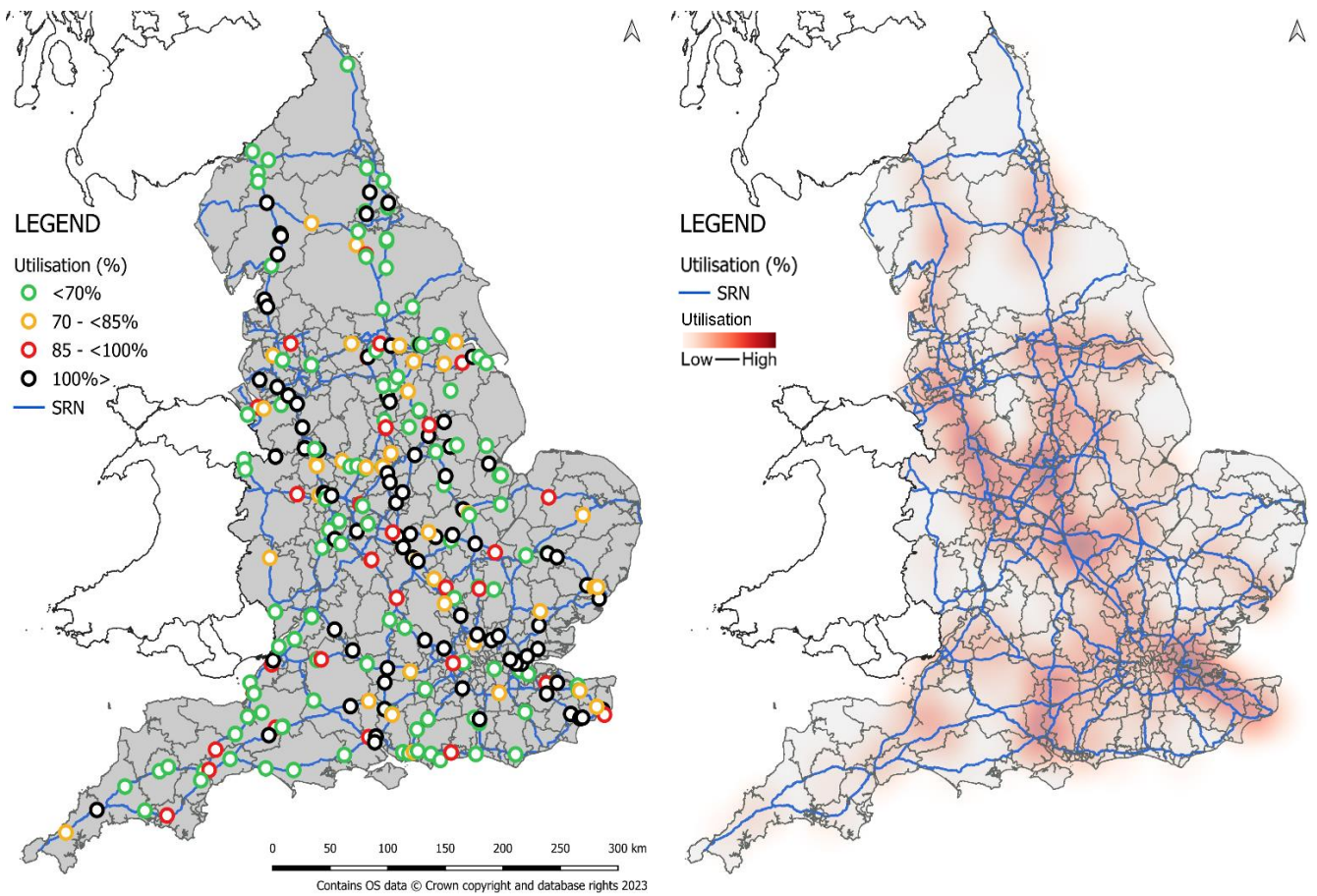


Figure 0-1: Lorry Park utilisation in England

Spatial Context

Local authorities need support to help ensure that lorry parking demand is met by safe, secure and comfortable facilities. Local Planning Authorities (LPAs) are tasked with the responsibility of aligning land-use planning with economic needs and are directly responsible for approving applications for new lorry parks. Therefore, it is essential for them to have a straightforward means of evaluating lorry parking demand in their respective areas.

National Highways can help by providing this information in a format that allows easy interrogation and clearly shows demand by LPA, comparison to other areas and where demand is present across several local authorities. Fundamentally, the LPDA can be used to influence local plans. Therefore, it is most suitable to develop the LPDA at the LPA level. The data derived from DfT Lorry Parking Survey, supplemented by the analysis conducted in this report, facilitates this process. This is therefore our recommended way of applying the data spatially.

Demand by LPA area

In conducting a comprehensive assessment, a ranking system was developed that evaluated local authorities by comparing the severity of their lorry parking issues in relation to each other. This system allows for a better understanding of which areas warrant closer inspection and attention, as demonstrated below in Figure 0-2.

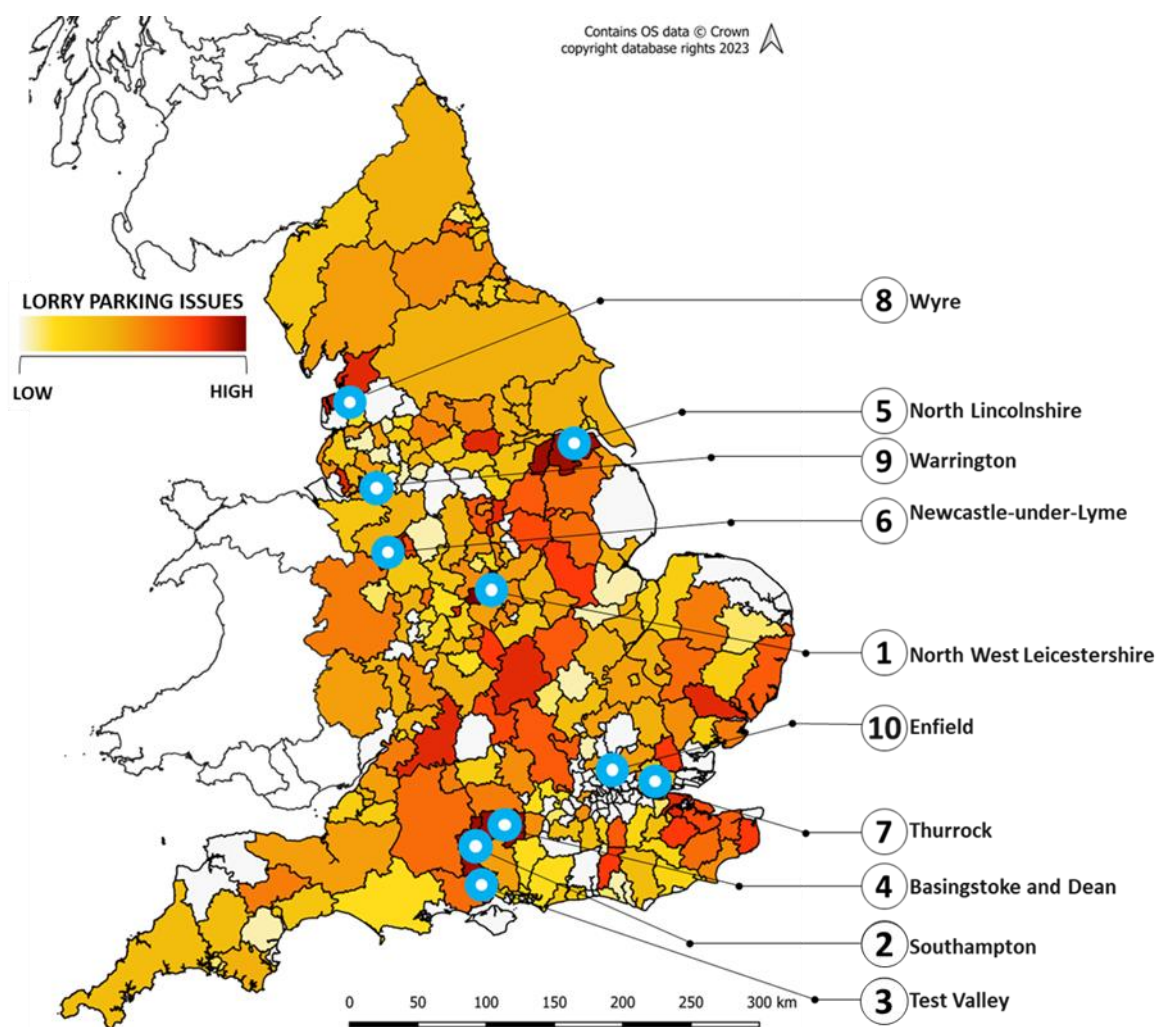


Figure 0-2: Lorry parking issues by local authority

The assessment shows that there is a requirement for National Highways to support LPAs in accommodating new or improved lorry parks. The tool that has been developed can help partners assess the extent to which the need for new lorry parking provision is prevalent in their area. This can be an important resource in the goal of delivering new and better lorry parking, that will benefit the freight sector and all those who live and work in areas affected by informal lorry parking.

1. Introduction

Background

This report has been developed to provide National Highways with an assessment of lorry parking demand on or close to the SRN.

The DfT tasked National Highways with the evaluation of lorry parking facilities and identification of areas experiencing high demand and insufficient provision. Having enough lorry parking and rest areas near the Strategic Road Network (within approximately 5 kilometres) is important for National Highways to meet three main goals: Safety, Customer Service, and Delivery.

This Lorry Park Demand Assessment is being produced in direct response to consultation responses on DfT Circular 01/2022 which replaced the previous guidance Circular 02/2013.

Paragraph 81 of Circular 01/2022¹ establishes that in areas where there is an identified need for greater HGV parking, National Highways will work with relevant local planning authorities to ensure that local plan allocations and planning application decisions address the shortage. Table 2 of the Circular also establishes that twice as many HGV spaces shall be provided at motorway service areas in these locations than the current minimum provision (0.5% of the average daily HGV traffic flow). Following the publication of Part 2 of the National Survey for Lorry Parking, National Highways will update its 2019 Lorry LPDA study to formally identify those areas of high demand. Where these findings are agreed by the Department for Transport, the higher threshold for HGV parking at motorway service areas will apply for applications submitted after the date of the LPDA's publication. Timeframes for subsequent updates to the LPDA will be agreed with the Department for Transport.

In March 2022, the DfT asked AECOM's Freight Team to conduct a detailed audit of over 4,000 parking areas, including official lorry parks, Motorway Service Areas, industrial estates, and laybys. This research followed on from the same audit conducted in 2017. Both the 2017 and 2022 audits revealed that there is a growing need for overnight lorry parking, identifying a shortage of facilities in six regions across England. Supply of new parking spaces is continuing to fall behind the demand for additional spaces and hence worsening the shortfall.

Outputs from the recently completed DfT Lorry Parking Audit (March 2022 survey data) provide an opportunity to review the 2019 LPDA (2017 audit data) and other studies/information that have since emerged.

It is recognised that there is a need for National Highways to work with LPAs to ensure that local plan allocations and planning application decisions address the shortage of lorry parking spaces. This work will help local authorities plan for and support Lorry Parks in their Land Use Planning Policy and Local Transport Plans (LTPs), as well as any other relevant policy and strategy positions. Therefore, there is a need to update this data and collaborate with local authorities to implement measures that address lorry parking challenges.

¹ <https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development/strategic-road-network-and-the-delivery-of-sustainable-development>

Purpose of this study

The main objective of this study is to analyse driver behaviour patterns on key freight routes, both qualitatively and quantitatively in terms of parking. The aim is to identify the areas with the highest demand for lorry parking and the least available supply. By focusing on the strategic spatial geography, we can pinpoint locations that are most likely to need new or expanded lorry parks. This information will be valuable for National Highways to provide input to the Local Authority Development Plan process and meet its obligation to provide suitable facilities for freight users.

This report also explores how data relating to the 2023 LPDA should be applied in a spatial context. The aim is to ensure that it is in a format that is useful for National Highways and partners and that the approach and associated methodology is robust and provides an accurate interpretation of lorry parking demand in an affected area.

Moreover, this study not only provides insights into the areas of highest demand for lorry parking based on all available data, but also considers factors that contribute to successful lorry park locations. The approach used in this work is structured into two stages, which will be discussed in detail in the following chapters.

- **Existing supply and demand** – this draws directly from the 2022 DfT National Survey
- **Local authority-led demand analysis** – Conducting an analysis by local authority is essential to gain a comprehensive understanding of the specific needs and requirements within different regions. This approach enables targeted and tailored solutions to be developed whereby resources and efforts are effectively allocated.

Document Structure

This document is split into 8 sections to highlight the key findings of the 2022 National Lorry Parking Audits.

Section 2 of the document details the data collection approach for the 2022 survey. This method involves national audits, comparisons with prior surveys, and underscores the crucial role of reliable data in shaping DfT policies. Additionally, it clarifies the routing and scheduling of audits, providing reasons for collecting data in specific locations, such as laybys, industrial estates, and lorry parks. Assurance is also given to imply the methodology is tried and tested.

Section 3 of the report summarises the results of the 2022 survey. It covers off-site and on-site trends, explores how lorry parking spaces are used, and identifies regions in the country where there is a high level of unmet demand.

In Section 4, the document details broader regions with significant unmet demand. This includes the East Midlands and West Midlands Logistics Hub, South East and East of England, Port of Liverpool and North West England, and the Solent to Midlands Corridor. The purpose of this section is to give a broad overview of areas facing notable challenges.

Section 5 reviews the different spatial analysis options for the study. An approach at the local authority level is justified with a list of pros and cons. Analysis at the local authority level is best suited to

precisely identify regions with a significant unmet demand for lorry parking, further informing National Highways for future work.

Section 6 is a longer section that goes deeper into the data analysis performed at the local authority level, building upon the approach outlined in section 5. It provides a more detailed explanation of the spatial methodology, which includes the use of a scoring system to comparatively assess local authorities and determine which are dealing with the most pressing unmet demand challenges.

The ten local authorities with the highest unmet demand are interrogated to understand localised unmet demand. This considers factors like the role of wider logistics hubs or proximity to the SRN and ports. The section subsequently acknowledges the responsibilities and actions required by these ten local authorities to address lorry parking issues by incorporating solutions into their Local Transport and Implementation Plans.

Limitations to the approach are also addressed in this section. These limitations involve the possibility of overarching factors like route choice or local freight geographies. As a result, alternative demand indicators are discussed to support any conclusions drawn from the spatial analysis.

Section 6 further explores an alternative spatial approach, which examines unmet demand in relation to the SRN and National Highways' 20 Route Strategies. The objective is to identify any "cross-border" issues where unmet demand remains consistent along an entire route or corridor, spanning multiple local authorities.

Section 7 addresses lorry park success factors. This section identifies two examples where there is inconsistent trends in demand and seeks to understand why. The M6 in Cumbria is used as an example where utilisation rates vary due to the availability of specific facilities and pricing.

Section 8 provides a summary and draws conclusions from the analysis.

2. Data Collection Methodology

This section details the methodology used to collect the data that informed this study, aiming to establish its credibility and suitability for assessing Lorry Parking Demand in England.

The national audits took place in March 2022 (with subsequent monthly surveys in some areas of North West England, the East of England, South East England, and the West Midlands). Outputs from the 2022 survey provided an opportunity to review the 2019 LPDA within the framework of newly emerged studies and information. Further to this there is an opportunity to provide a direct comparison of overnight on-site and off-site utilisation with the previous 2010 and 2017 surveys (this shows both trends in lorry parking demand and acts as quality assurance, meaning any unexpected data can be cross checked), and to assess utilisation of any newly identified sites. The 2022 night audits were undertaken on Mondays, Tuesdays, Wednesdays, and Thursdays between the hours of 6.00pm and 2.00am.

DfT recognise the importance of robust data collection to inform policy development regarding lorry parking and the well-being requirements of drivers. The 2022 lorry parking research study was aligned with the DfT's objective of creating an evaluation of lorry parking availability and demand. These surveys, as with those undertaken in 2010 and 2017, provide invaluable evidence to support the DfT in their efforts to address these issues effectively.

Teams of two auditors travelling in one car on pre-arranged routes conducted each nightly audit. Over 4,000 sites were visited, as illustrated in Figure 2-1, including 326 on-site parking facilities, 827 industrial estates and 3,241 laybys within five kilometres of the SRN. For this study, 'off-site' locations refer to industrial estates and laybys and 'on-site' parking facilities refer to independent truckstops, local authority truckstops, Motorway Service Areas (MSAs) and Trunk Road Service Areas (TRSAs).

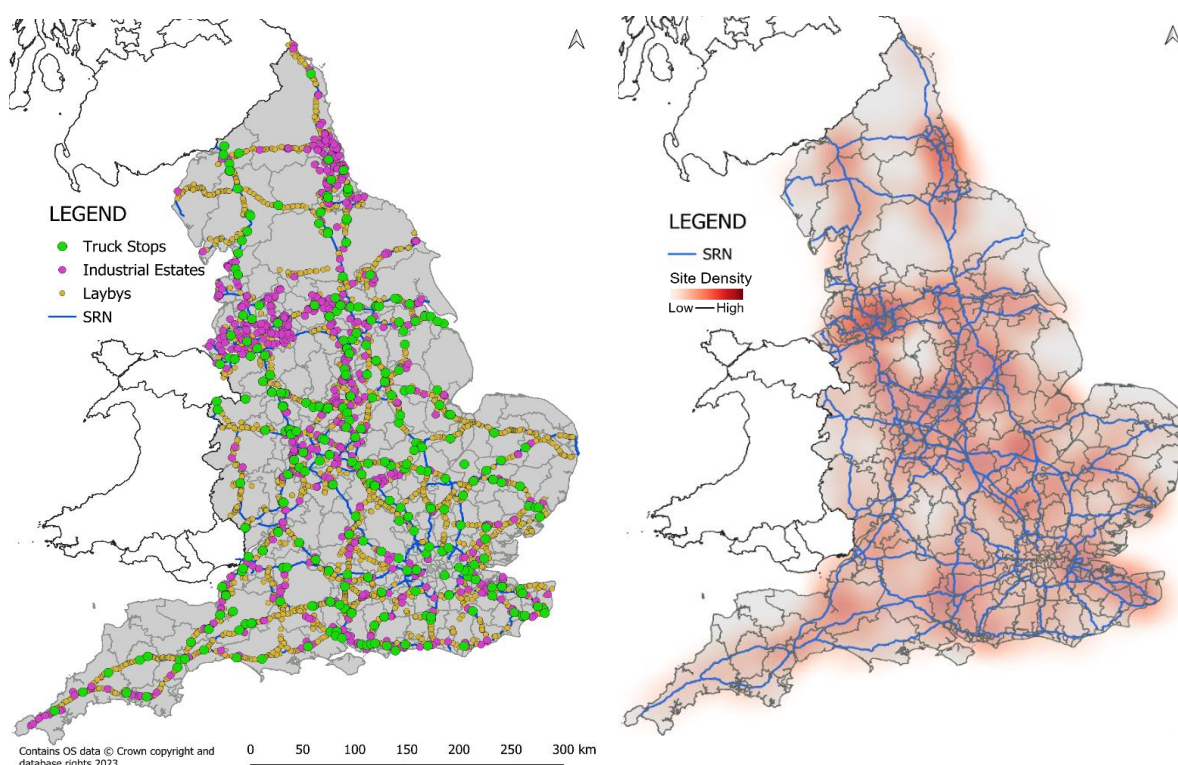


Figure 2-1 All locations visited

Routing and scheduling of audits

As in 2010 and 2017, the country was split into nine separate regions. The regions were originally based on the nine administrative regions from The Government Offices for the English Region, and the same regions and boundaries have been used for the 2022 study, as listed below, and shown in Figure 2-2.

1. East Midlands
2. East of England
3. London
4. North East
5. North West
6. South East
7. South West
8. West Midlands
9. Yorkshire and the Humber



Figure 2-2 Map from the Government Offices for the English Regions showing the nine regions

responsible for data analysis. Capacity and utilisation of lorry parks, lay-bys and industrial estates were assessed against previous years and for several key routes monthly (to assess seasonal changes and corroborate findings).

DfT and partners are therefore confident that this is a dataset that can be trusted, reported on and used for a variety of applications.

Summary

The 2022 lorry parking research study provides an accurate assessment of lorry parking provision and demand on or around the SRN in England.

Through physical audits and a comparison with the previous study in 2017, the findings inform public bodies and help support the industry in meeting the parking and welfare needs of drivers while supporting the country's economic requirements.

The study reveals a shortfall in on-site parking facilities, with 21,234 vehicles observed within five kilometres of the SRN against an on-site capacity of 16,761. This results in an excess of 4,473 vehicles compared to capacity. Several factors have contributed to the demand for lorry parking, including economic activity, population growth, trading patterns, journey distances, driver shortages, cost differentials, security and welfare needs, and safety concerns. While the precise impact of each factor remains uncertain, the study highlights that the demand for lorry parking spaces has outpaced the supply of additional spaces over the past five years.

Furthermore, the study identifies 127 on-site facilities that are at a critical level, with 85 percent capacity or more. For instance, Ashford International Truckstop is highlighted as an example, which regularly turns away over 100 vehicles on average.

The assurance statement acknowledges the importance of the 2022 lorry parking research study in providing valuable insights to address the growing demand for lorry parking spaces, prioritise improvements in infrastructure and services, and ensure the well-being of drivers while supporting the economic interests of the country. The DfT and relevant public bodies are committed to taking necessary actions to address the challenges and bridge the gap between demand and supply in lorry parking provision.

3. Lorry Parking Demand - National/Regional Overview

This section outlines the headline findings from the 2022 Lorry Parking Survey on a national and regional basis, which helps identify the overall picture and any immediate 'hotspots' where there is an undersupply of formal lorry parking facilities. Further analysis on these hotspots has been undertaken to explore these areas further.

On-site parking

The assessment of on-site truck parking facilities involves comparing the number of parked vehicles to the existing capacity, providing valuable insights into areas where additional truck parking provision is needed. In the previous demand study conducted by the DfT, a categorisation system was established (Table 3-1) to determine when high utilisation becomes problematic.

It is acknowledged that when utilisation reaches 85 percent or higher, drivers face challenges in finding parking spaces due to the size and positioning of the vehicles. Consequently, at this threshold, the Lorry Park is deemed practically full. A further utilisation rate of over 100% was added to the categorisation system. This differentiated the lorry parks which were nearly at capacity and those which were completely full.

Description	Utilisation (%)
Severe	≥100.00
Critical	≥85.00 – <100.00
Serious	≥70.00 - <85.00
Acceptable	<70.00

Table 3-1 Lorry Park Categorisation

This section aims to identify areas with highly utilised lorry parks (i.e. lorry parks with above 85% utilisation falling under the 'severe' or 'critical' categories). As show in Table 3-2, 127 out of 326 lorry parks (on-site) are identified as critically or severely utilised, with utilisation above 85 percent. This is significantly higher than the 112 lorry parks recorded under the same categories in 2017.

Major freight arteries, such as the M1, M3, M4, M5, M6, M11, M18, M20, M25, M27, M40, M56, M62, and M180, are typically home to critically or severely full services. Moreover, several A-roads, including A1, A3, A5, A12, A14, A20, A23, A27, A30, A34, A38, A46, A50, and A417, also feature lorry parks that experience significant utilisation. It is important to note that an acceptable level of utilisation (indicated by a green dot in Figure 3-1) does not always imply an underutilised or unsuccessful lorry park. Rather, it can suggest that, at the time of the survey, the lorry park was relatively quiet.

As shown in Table 3-2, the South East and East Midlands have the highest number of critical and severe lorry parks (25 each), with the East Midlands having 20 lorry parks over 100% utilised. The average utilisation in these two regions is roughly the same, with the East Midlands at 82% and the South East 83%. Later in the report, further analysis on lorry park utilisation is carried out to identify local authorities have high demand for existing lorry parks.

Table 3-2 also identifies local authorities where there are several critically and severely utilised parks. Only areas with at least three existing critical/severe lorry parking facilities have been included. Generally, regions that have the greatest number of critically/severely utilised lorry parks also include the most local authorities where all lorry parks are critically/severely utilised. It is worth noting that the data presented in the table below does not necessarily indicate the areas in which demand for lorry parking is the greatest, but rather where there is the greatest potential for unmet demand.

There are several similarly located lorry parks which incur varying levels of utilisation, which demonstrate drivers' preferences for security, showering facilities and areas for socialising. These factors are discussed in the next section.

Region Local Authority	Total lorry parks	No. Critical utilisation (≥85.00 – <100.00)	No. Severe Utilisation ≥100.00	Total ≥85.00	Average Utilisation
South East	64	11	14	25	83%
East Midlands	49	5	20	25	82%
North Northamptonshire	6	1	2	3	70%
West Northamptonshire	7	0	5	5	101%
East of England	44	4	16	20	92%
Thurrock	4	0	4	4	121%
South West	44	11	4	15	62%
Somerset	11	3	1	4	65%
Wiltshire	6	2	1	3	71%
North West	36	5	9	14	77%
Cheshire East	5	0	3	3	80%
Westmorland and Furness	9	0	4	4	81%
West Midlands	36	9	5	14	76%
Yorkshire and Humber	37	6	4	10	66%
Wakefield	5	2	2	4	95%
North East	11	0	3	3	56%
London	5	0	1	1	49%
Total	326	51	76	127	71%

Table 3-2 Critically and severely utilised lorry parks

In the left hand diagram in Figure 3.1, lorry parks marked with a red or black dot were nearly or completely full at the time of the audit and this has been translated into a heat map on the right.

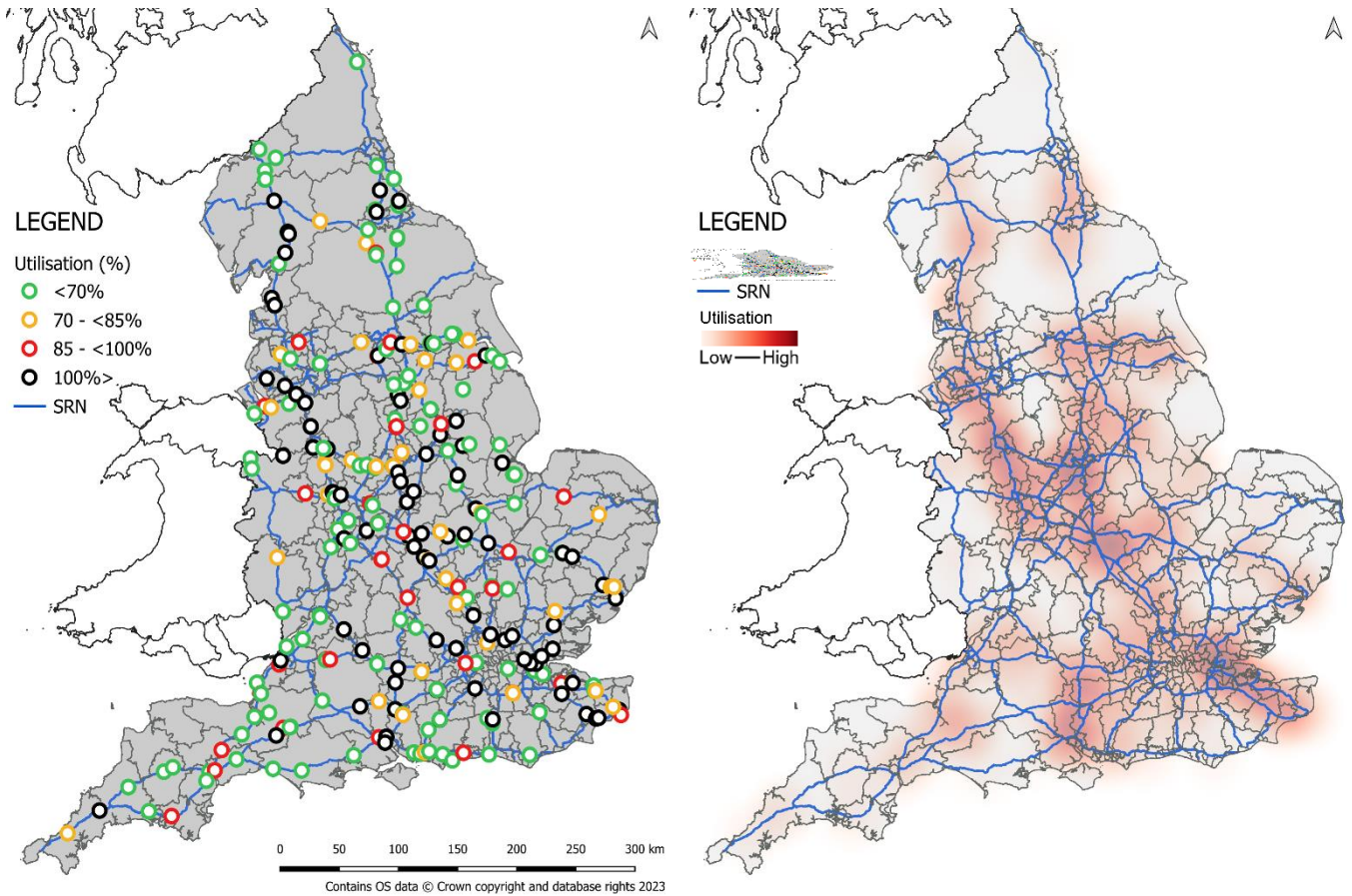


Figure 3-1. Lorry Park utilisation in England

Off-site parking

In total, 21,234 lorries were parked overnight across England, with 35 percent of them observed to be parked off-site. A total of 16,761 on-site spaces were recorded, which means that even if all of these spaces were filled, a theoretical excess of 4,473 lorries remain which cannot park in designated lorry parking areas. In practice, some of the available parking capacity is left unused on a daily basis and a significant number of HGVs park in laybys, industrial estates and other inappropriate places overnight.

Lay-bys

A layby has been considered as being used for overnight lorry parking if one or more lorries were recorded. Table 3-3 and Figure 3-2 below show layby-usage across the nine English regions. Around 50% of all laybys (1,605) have been used by at least one lorry during the survey. 1,636 laybys were recorded with no parked lorries. Outside London, the South East had the most used laybys (308) as well as the highest percentage of used laybys (60%). Although London has the highest percentage of used laybys, it may not accurately indicate the demand, due to the small sample size (only eleven laybys in total). However, it is known from consultation that lorry parking problems do exist in London.

The use of laybys has marginally changed between the 2017 and 2022 survey. Some of the biggest changes can be seen in the West Midlands, where utilisation fell from 65% to 52%, and in North West England, where utilisation fell from 51% to 39%.

Region	Total Laybys	Used Laybys	Percentage
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London	11	8	73%
South East	515	308	60%
East of England	480	261	54%
East Midlands	518	269	52%
West Midlands	287	148	52%
Yorkshire and Humber	305	134	44%
South West	548	217	40%
North West	327	129	39%
North East	250	86	34%
Total	3,241	1,605	50%

Table 3-3 Regional Layby Utilisation

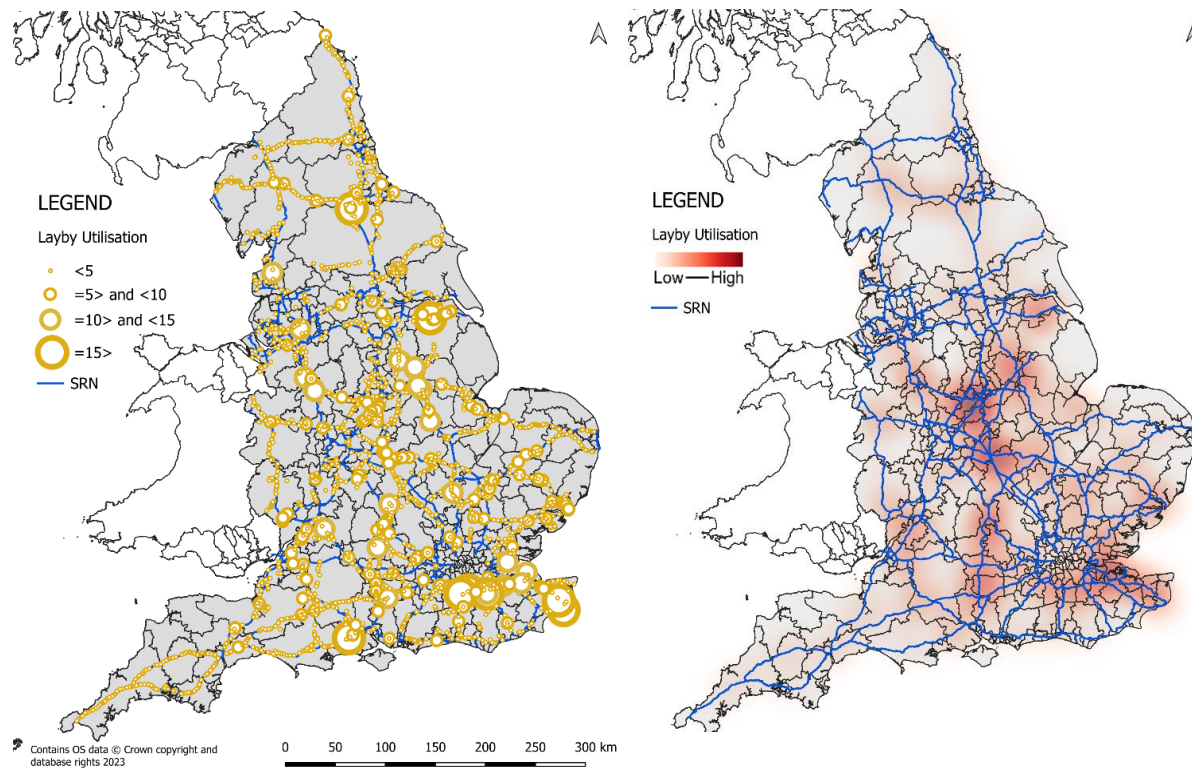


Figure 3-2 Layby usage

Industrial areas

Industrial areas with off-site lorries are categorised into three groups (i.e., low usage, medium usage and high usage) as shown in Table 3-4 below. This helps to differentiate areas with high demand for lorry parks.

Categorisation	Number of Lorries Parked
Low usage	5 or less
Medium Usage	5 to 10
High Usage	More than 10

Table 3-4 Industrial Usage Categorisation

Error! Reference source not found. and Figure 3-3 show industrial estate usage across the nine English regions. The North West had the most industrial estates surveyed (183), with London (expectedly) having the lowest (19). The East Midlands and North West had the most highly utilised industrial estates (at 21 and 16 sites respectively). The East Midlands also had the highest percentage of highly used sites; 21% of all industrial estates had more than 10 lorries parked in them. Despite having fewer highly utilised sites, the East of England had 18% of sites with over 10 lorries.

The heat map in Figure 3-3 demonstrates areas with high industrial estate utilisation include the A34 near Southampton, the SRN near the Port of Liverpool (M6, M57, M58 and M62), large swathes of the Midlands (M1, M6, M69 and A5), the region around London Gateway (M20, A2, and A13) and some activity in North East England (A1, A69, A194[M]). The 2022 audit revealed marginal changes from the 2017 audit. For instance, London had no highly utilised sites in 2019, but had 2 in 2022, and the East of England and East Midlands both reported an increase of 6%. The North East was the only region that saw utilisation of industrial estates decrease between the surveys, with high usage sites falling from 8% to 4%.

Region	Total Estates	High Usage	High Usage % in the region
East Midlands	102	21	21%
East of England	33	6	18%
West Midlands	68	10	15%
London	19	2	11%
North West	183	16	9%
Yorkshire and Humber	107	10	9%
South West	78	6	8%
South East	124	7	6%
North East	113	5	4%
Total	827	83	8%

Table 3-5: Regional Industrial Estates Usage

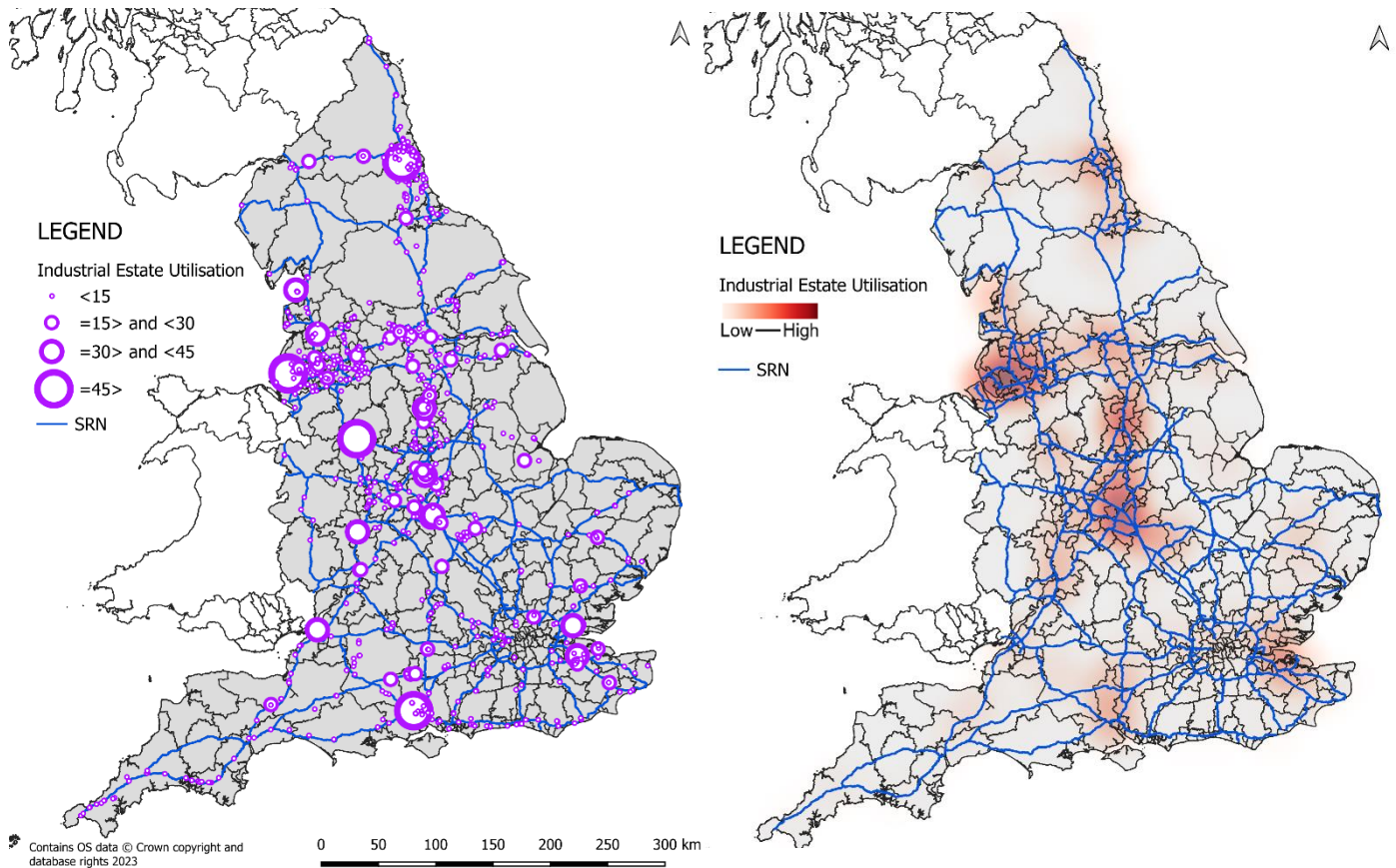


Figure 3-3 Industrial Estates Utilisation

Combined off-site parking

The off-site parking recorded for laybys and industrial estates has been combined into a utilisation density 'heat map' shown in **Error! Reference source not found.** This map illustrates the areas of England with the greatest off-site parking issues and will be used to represent off-site parking in the subsequent sections.

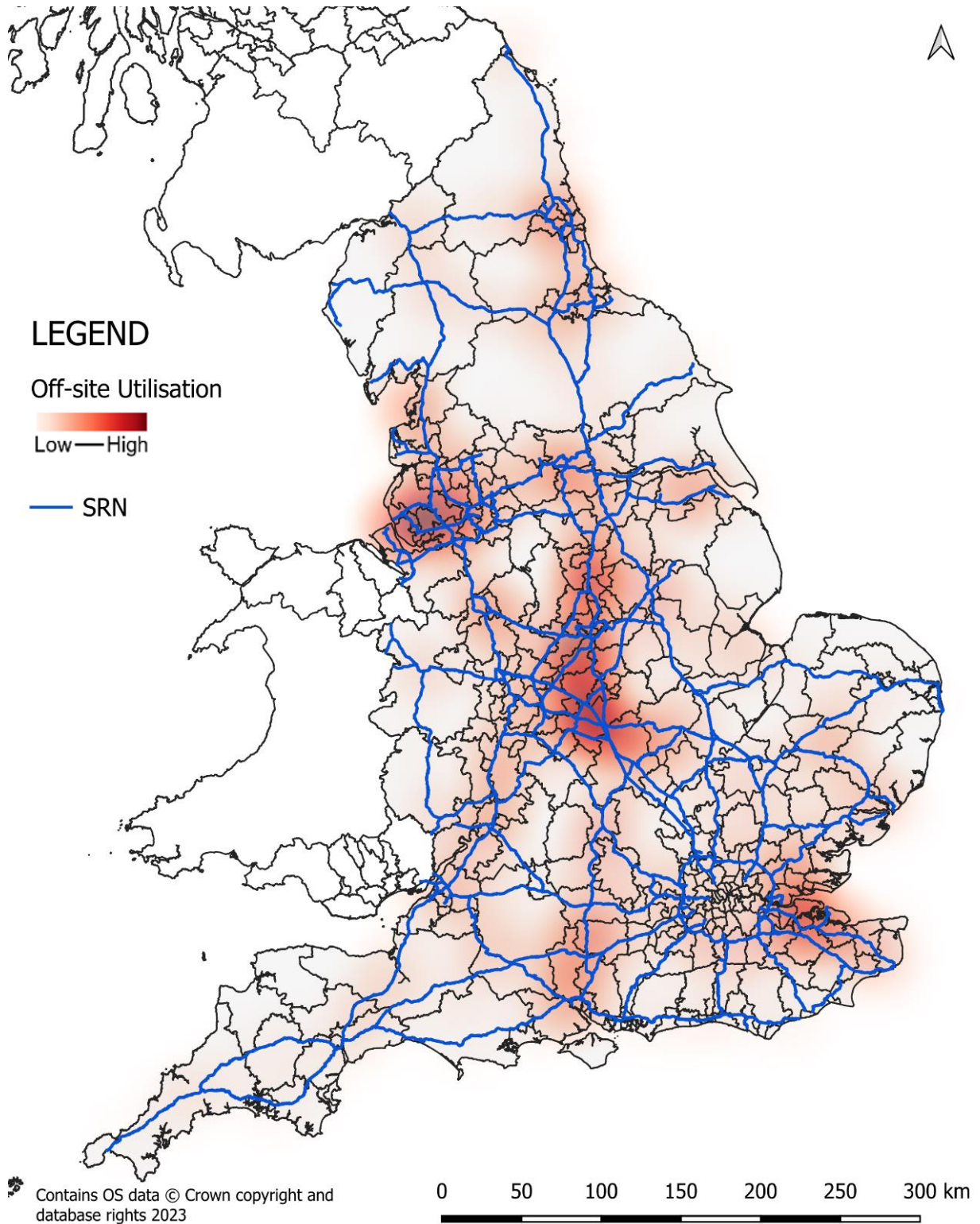


Figure 3-4 Combined off-site parking

4. Identified Areas of High Demand

Overview

Using the off-site parking data as well as lorry park utilisation, this section details an analysis of parking demand 'hot spots' with high unmet demand. In each 'hot spot' discussed, a map is shown which combines the previously shown lorry park utilisation map (Figure 3-1) and the off-site heat map (Figure 3-4). This section provides an overview of these hot spots; detailed spatial analysis of local authorities is discussed in Sections 5 and 6. Geographical areas discussed in this overview include:

- The Midlands logistics hub
- South East England and East of England
- The Port of Liverpool and North West England
- Solent to Midlands

East Midlands and West Midlands – Logistics Hub

The Midlands is a key generator of freight and has several key routes connecting the north to the south. The East Midlands has some of the highest off-site parking figures in England, with over 50 percent of laybys used and the highest proportion of industrial estates with 10 or more parked lorries (21%). The high density of off-site parking and critically utilised lorry parks can be found along the M1 corridor in the East Midlands, where the A5 and M6 meet the M1 near Rugby, and on the M6/A14 between Birmingham and Cambridge.

This is also part of the wider 'golden triangle', which is the part of the UK where logistics activity is most concentrated and is considered a prime location for National Distribution hubs. As a further way of putting this into context we have reviewed the national list of freight vehicle operating centres run by the Traffic Commissioners. All operators of heavy duty vehicles whether HGVs or PCVs (Passenger Carrying Vehicles) have to apply for a licence and specify various details including the number and location of where they propose to base their vehicles. Companies tend to base their vehicles near to centres of transport activity and hence it is useful to see which towns and cities have the most operating centres. Within this golden triangle area, but extending slightly into the East of England to Peterborough, 7 of the top 20 operating centre towns/cities in England can be found, with roughly 4,074 centres located at Birmingham (823), Nottingham (745), Leicester (598), Northampton (546), Peterborough (477), Dudley (462) and Coventry (423).

Traditionally, the golden triangle is bounded by the M1, M6 and M42 and has been a key hub for logistics for the last 40 years. The term 'golden triangle' was coined by property developers keen to attract businesses to the Midlands based on a national hub and 'spoke' distribution pattern. Although numerous warehouses were built there was insufficient attention given to providing space for the HGVs involved in this activity. The high density of unmet demand in the Central Midlands also spills into adjacent areas and SRN, like the A1(M) passing through Peterborough and the A46 heading towards Lincoln. The main reason for this is that HGV drivers can reach most areas of the UK from here within their maximum daily drivers hours rules, thus it is a convenient and timely place to rest.

Unsurprisingly, there is a high density of used laybys, critical lorry parks and industrial estates with more than 10 lorries in this area. This is illustrated in Figure 4-1.

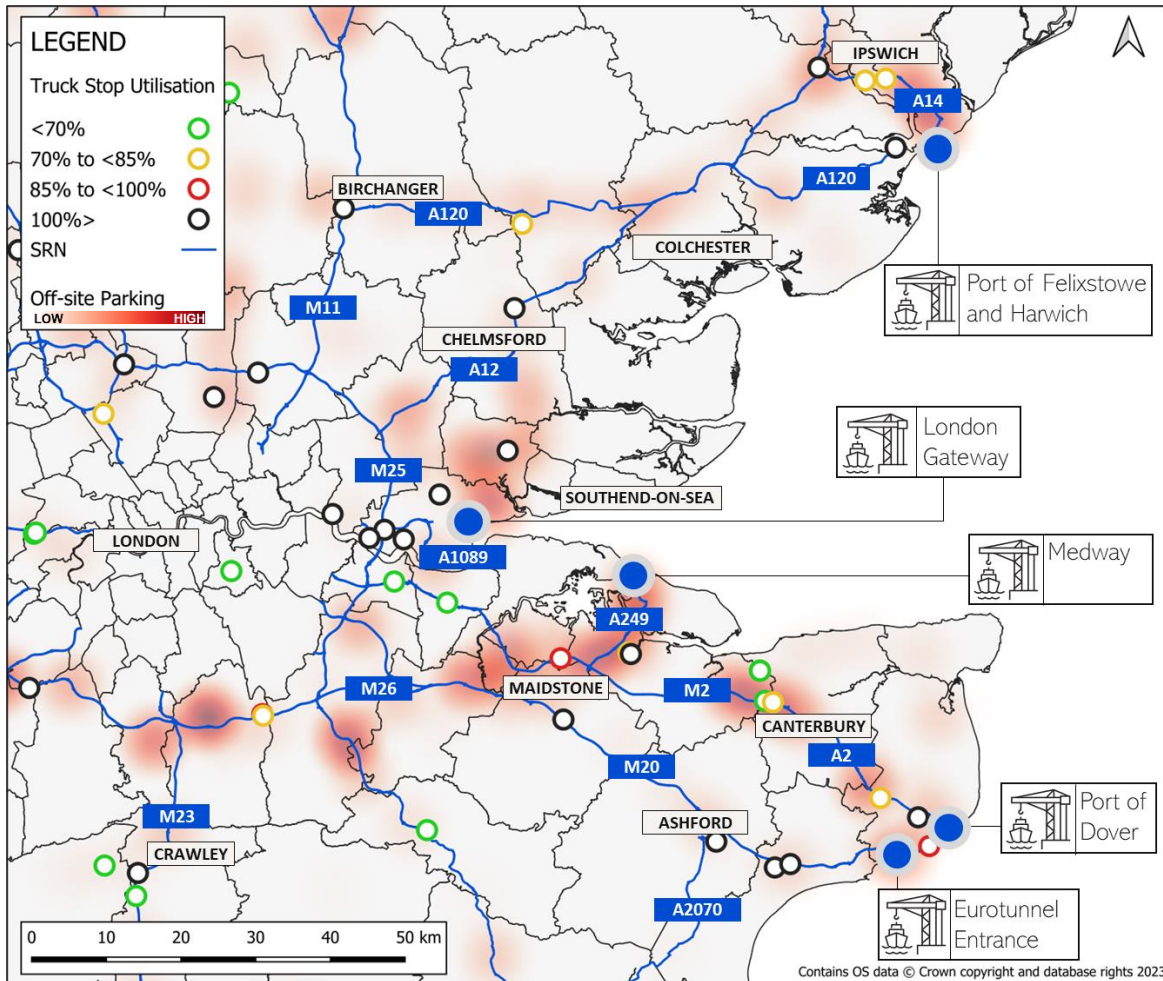


Figure 4-2 Hotspot with Layby Usage and Critical Lorry Parks – South East and East of England

Port of Liverpool and the North West

Figure 4-3 illustrates unmet demand along the M6 and in parts of Cheshire/Merseyside, notably on the M62 and M57. There are areas of high off-site parking demand between Liverpool and Manchester, as well as the M6 (through Lancaster further north and Stoke-on-Trent to the south). Stoke-on-Trent, despite not being regionally part of the North West, is particularly important as it serves a key industrial conurbation on the M6 transit corridor, facilitating freight movement to the region.

Recognising the need to address the challenges evident in Figure 4-3, it would be useful to consider a new lorry park on the M6 or M62 near Warrington. To this end, there are plans to develop a new MSA on the M62 J11 near Warrington, with approval already granted. The Extra MSA group is currently engaged in preparatory work, aiming to begin construction in 2024. The site will be known as Birchwood. Warrington and surrounding areas are operating at critical levels of utilisation, as evident from the issues with HGVs parking in laybys and industrial estates around M62 J11 and the adjacent Birchwood Business Park. Therefore, the construction of the planned MSA on the M62 holds great significance in addressing the pressing need for adequate lorry parking facilities in the region. This is despite Warrington already having the large Lymm Truckstop (MOTO) at the intersection of the M6 and M56.

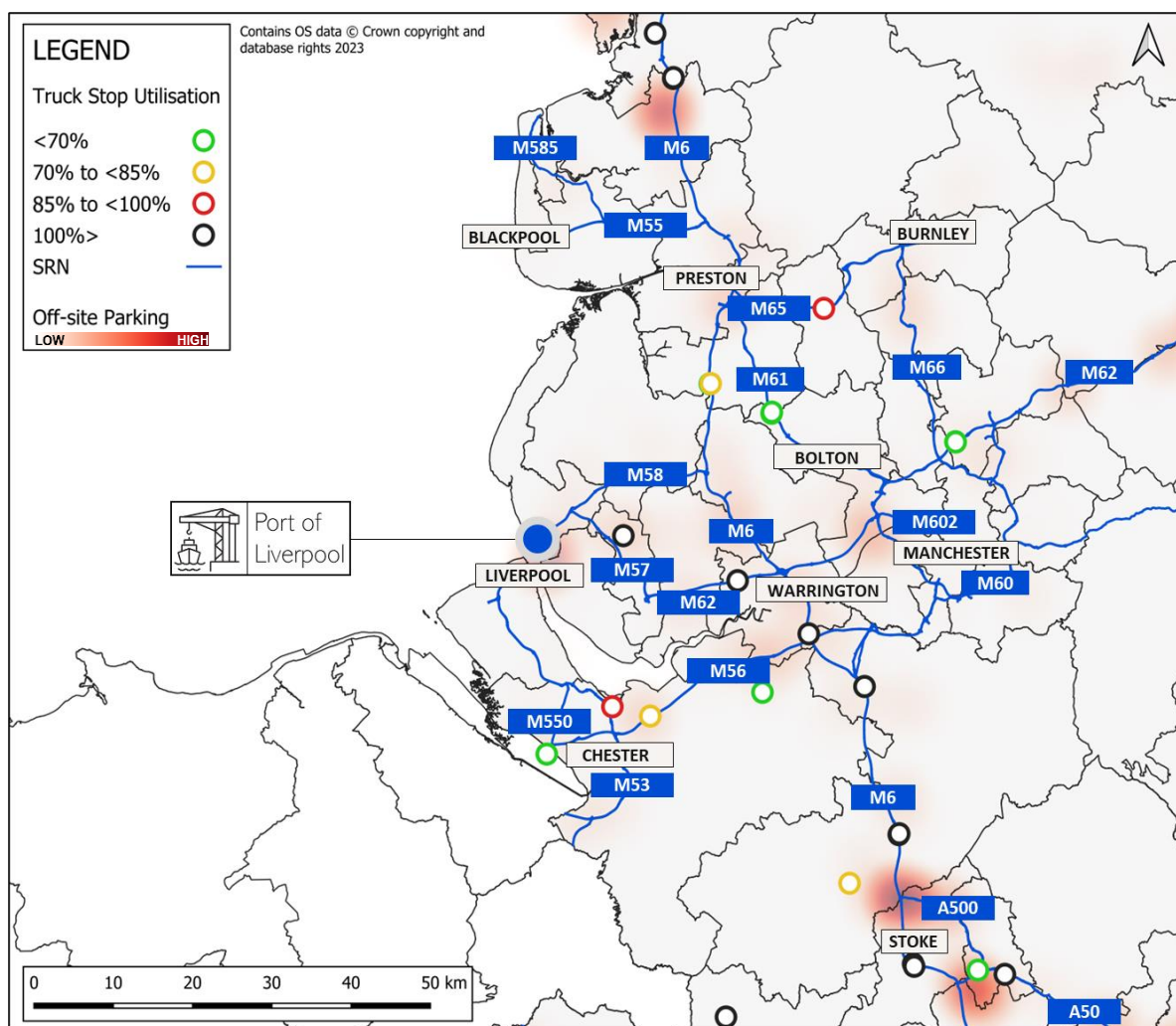


Figure 4-3 Hotspot with Layby Usage and Critical Lorry Parks – Port of Liverpool and North West

Solent to Midlands Corridor

The A34 (from Solent to the Midlands) has high levels of off-site parking. It is worth noting that almost all laybys had HGVs parked in them during the survey and there were several heavily utilised industrial estates with 10 or more parked lorries, as shown in Figure 4-4. A high number of over utilised lorry parks are observed along the A34, which explains a high layby usage rate in Hampshire and Oxfordshire. There is a considerable demand for lorry parking at the intersection of the A303 and A34, where flows heading north to the midlands and east to London converge.

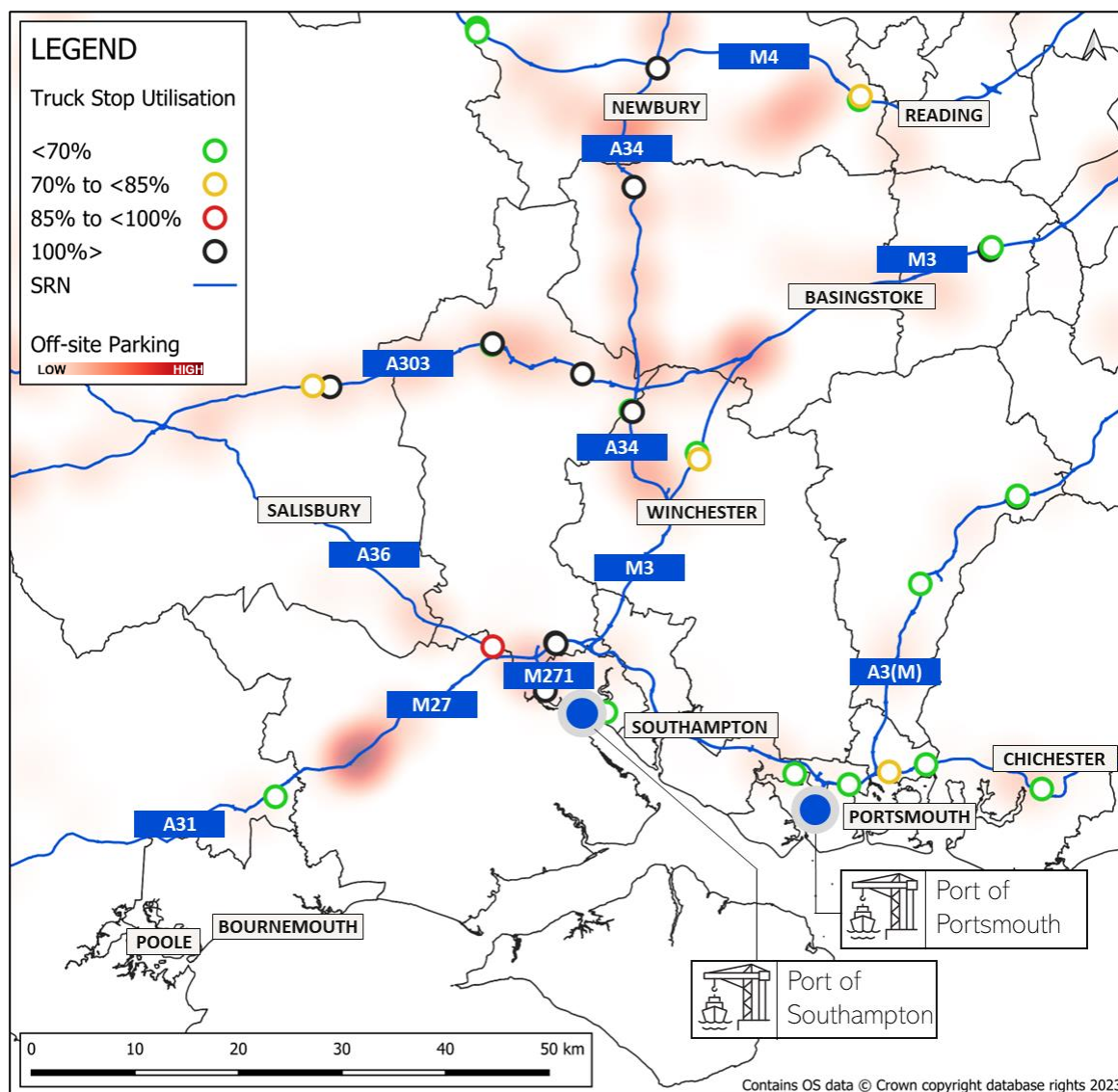


Figure 4-4 Hotspot with Layby Usage and Critical Lorry Parks – Solent to Midlands

Summary

There is widespread unmet demand for lorry parking spaces in England, with specific hotspots in the Midlands, around major ports, and along key SRN routes. Addressing this issue is critical for the efficiency and safety of the freight industry and driver welfare. From the four regions discussed, it is evident that:

- The Midlands, as the country’s key freight hub, lacks sufficient lorry parking. This creates localised issues and a ‘spill-over’ of high unmet demand into regions like the North West and East of England
- Major ports in the East of England and South East need more lorry parking provision
- There is high demand for lorry parking on the A34 between Solent and the Midlands, notably with off-site parking which increases at major road intersections with the M4 and A303
- Unmet demand is high on the M6 in the North West; a new lorry park planned in Warrington ought to relieve some demand

5. Spatial Approach to Assessment

As discussed, the aim of this LPDA is to provide National Highways and partners with clear and easily interrogatable information that can help inform interventions and quickly address any knowledge barriers. How data is displayed spatially will impact on how it can be used. Therefore, consideration was given to the spatial context of the analysis. Several spatial contexts were considered as part of this study. They include:

By Strategic Road Network Corridor (SRN) Approach – Looking at lorry parking demand across the 20 key corridors on the SRN developed as part of previous route study work

By Sub National Transport Bodies – looking at lorry parking demand for the eight sub-national (or regional) transport bodies in England including TfL. Outside of London, their membership is formed from a mix of local highways authorities, Local Enterprise Partnerships (LEPs), airports, National Highways, Network Rail, the DfT, trade associations and private business.

By Local Highway Authority – the organisation responsible for the public roads of a particular area that are not classified as being the SRN. These often align with local authority boundaries but often a County Council will perform this function for its constituent District Councils.

By Local Planning Authority (LPA) - the local government body that is empowered by law to exercise urban planning functions for a particular area. A local planning authority of an area is usually the local authority (or Council) such as a borough or district council.

Options

This section outlines the options for each of the spatial profiles, arranged from a larger macro level to a more focused 'micro' approach. The pros and cons of each approach are explained in this section.

National Highways Route Strategies (SRN)

Pros

Reflects typical end-to-end freight movements: The SRN is the most heavily used part of the national road network, carrying a third of all traffic and two-thirds of all freight. Analysis by key SRN corridors would work directly with National Highways and help maintain balance in the nation's economy. Freight Movements are rarely undertaken within a local authority boundary and often pass through many different areas. Taking a corridor approach to lorry parking means that demand across a whole route can be assessed. Drivers are generally unconcerned as to which local authority they park in and assessing data on a corridor basis means a holistic approach can be taken on key freight routes. Examples of these include connections between cities and ports or National Distribution Centres and depots/stores.

Could facilitate collaborative working; Working on a corridor basis provides an opportunity for collaboration. Often areas of demand intersect local authority boundaries, which can make it challenging to identify a co-ordinated approach. An area of unmet demand in one authority could be addressed by enhanced provision in a neighbouring authority. Taking a whole route approach can help overcome these challenges. Issues that transcend local authorities can also be identified.

Helps address lack of resources at authority level: Physical infrastructure or even officer time to consider the issue of lorry parking can be resource and cost intensive. There are many competing demands for time and funding for local authorities, even within the transportation remit and as such an approach potentially utilising National Highways and a combination of several authorities' resources can mean the issue of addressing demand is adequately met.

Can better align with the aspirations of Road Investment Strategies (RIS2/3): RIS 2 and the forthcoming RIS 3 set out how National Highways will enhance the SRN over a 5-year period. They often outline how routes can be improved from a strategic perspective, rather than a more localised approach. The route strategy work has informed the development of RIS3 and there are potential synergies to explore here.

Cons

May not reflect demand for lorry parking away from the SRN: Assessing demand using SRN corridors may fail to address issues away from the network as there may be high demand on the local highway network that were not in the remit of the DfT survey.

Inappropriate spatial level for influencing Local Plans: Local Plans are generally aligned with local authority boundaries and represent the most powerful way that land use can be influenced, setting out planning policy across the authority and providing clarity to developers as to authorities' aspirations for individual sites. Providing partners with an assessment based on routes may be challenging for them to integrate into their respective Local Plans. As a result, this is not a preferred spatial approach.

Sub-National Transport Bodies (STBs)

Pros

Can provide support to partner local authorities: STBs combine an approach to review the SRN but also group affected councils / local authorities together, closing the gap between national and local issues and perhaps providing good insight into how lorry parking issues could be dealt with. This means that they can sometimes work better with DfT to obtain larger funding amounts for improvements and for other affected statutory bodies facing parking issues. STBs have been asked by DfT to consider how they can support the provision of new and improved lorry parking and as such are currently exploring the issues in their area.

Cons

Lack of resource: Some STBs are unlikely to have the resources to adequately identify priorities with several having only a few dedicated staff and a wide remit covering all areas of transport.

Inappropriate spatial level for influencing Local Plans: STBs are not necessarily aligned with LPA or Local Highway Authority (LHA's) boundaries, and therefore analysis on a regional basis will not provide the granularity needed for Local Plans. As previously mentioned, STBs do not have a remit over land use planning or the wider highway network and therefore are less able to directly influence local plans than their partner LPAs. As a result, this is not a preferred spatial approach.

Local Highway Authorities (LHAs)

Pros

Highway remit: Local Highway Authorities have a remit to ensure the effectiveness and safety of the non-strategic highway network and have responsibility for delivering LTPs. County councils, unitary authorities, passenger transport authorities and London Borough councils typically produce LTPs, which should include reference to new and improved lorry parking provision where appropriate (new guidance awaited). Like LPAs, LHA officers will receive complaints about lorry parking and other issues that off-site parking causes meaning they will have insight into related issues. This remit means they will likely have a greater level of transport expertise, especially in 2-tier authorities.

Cons

Lack of alignment with LPA boundaries: LHAs are not always completely aligned with LPA boundaries in the case of County and District authorities, which may result in disconnect between land use planning and transport. As a result, this is not a preferred spatial approach.

Local Planning Authorities (LPAs)

Pros

Can directly influence Local Plans and Planning Decisions: LPAs lead the development of Local Plans. Taking this spatial approach can help influence Local Plans, which outline land use planning policy for a particular area. The LPDA outputs can and should inform Local Plans. National Highways is a statutory consultee in the planning system and therefore this approach reflects the vital role it needs to play in guiding and supporting partners in relation to land use planning. LPAs also consider applications for new lorry parks (and the removal of existing provision). Data provided at this level can help ensure that demand is fed into these decisions. As a result, this is the preferred spatial approach.

Ensures Ownership at local level: This approach ensures ownership at a relevant spatial level and is not transferred by implication to a neighbour. Similarly, there is an opportunity still to collaborate with neighbouring authorities where there is opportunity and agreement to do so.

Aligns with officer knowledge of issues: Local authority officers often receive complaints about situations relating to issues caused by inappropriate off-site parking of vehicles. Planning Officers can liaise with Highway Officer colleagues and combine LPDA outputs and feedback from those who live and work in an area to develop land use planning solutions.

Can co-ordinate with other interventions and objectives within the remit of Local Authorities: Local authorities often have a remit to facilitate the introduction of charging/alternative fuel options. These could be dovetailed with lorry parking provision, and demand derived from the LPDA may influence the number of charge/refuelling points installed. Local authorities also have targets to facilitate sustainable and efficient delivery of goods, with carbon reduction targets. Reducing unnecessary vehicle miles spent looking for parking (where facilities are full or there is no provision) will help achieve these aims.

Cons

Lack of resource and freight knowledge in some local authorities: A lack of freight knowledge/specialism and capacity at officer level and that of members may mean outputs from the LPDA are not fully utilised. Any outputs from the LPDA should be developed so that data is easily interrogatable and understood.

Summary

Local authorities need support to help ensure that lorry parking demand is met by safe, secure and comfortable facilities. As LPAs have a remit to ensure that land-use planning supports the economy and direct responsibility for approving applications for new lorry parks, there is a need for them to be able to easily assess and understand lorry parking demand in their area.

National Highways can help by providing this information in a format that allows easy interrogation and clearly shows demand by LPA, comparison to other areas and where demand is present across several local authorities.

Fundamentally, the LPDA is for use in influencing Local Plans. Therefore, it seems most appropriate to develop the LPDA at the LPA level and the data derived from the DfT Lorry Parking Survey supplemented by the analysis here allows this to be achieved. This is therefore our recommended way of applying the data spatially.

6. Lorry Parking Demand by Local Planning Authority Area

The overview provides good insight on a regional basis as to where there are lorry parking demand and utilisation issues. However, as outlined in Section 5, Local Planning Authorities need a more focused understanding of their networks to deliver effective LTPs and Local Plans, which support local lorry parking facilities.

A comparative spatial framework has been developed for each LPA in England, utilising survey data from both off-site and on-site lorry parking. The purpose of this framework is to produce an analysis which highlights local authorities with the most severe lorry parking issues, thereby guiding future funding and support allocation.

The analysis ought to identify areas that require focused attention to address their lorry parking challenges effectively, producing a low-level review which details freight attractors, generators, transitory routes, and ports (amongst other factors) in the worst affected local authorities.

This information is now being integrated into National Highways data repositories for use across a number of workstreams.

Approach

To facilitate a thorough assessment, a ranking system was devised, evaluating local authorities based on the severity of their lorry parking issues in relation to one another. This system allows for a better understanding of which areas warrant closer inspection and attention.

Off-site parking issues:

To address off-site parking issues, we employed a quantitative approach by calculating the number of lorries parked in laybys and industrial estates per km of SRN within each local authority. For instance, if a local authority had 10 off-site parked lorries and 10 km of SRN, the average would be one lorry parked per km. The local authority with the highest number of lorries parked per km scored 10, while the one with the least scored 0.1. A minimum score of 0.1 was assigned to local authorities with even very few off-site parked lorries, as this still indicates potential issues with adequate on-site parking provision. Local authorities with no SRN or no lorries parked off-site (likely due to the area not being surveyed) automatically scored 0.

On-site parking issues (lorry parks):

Like the off-site analysis, a comparable quantitative method was used to assess local authorities based on the severity of their parking issues at lorry parks. The average utilisation of all lorry parks within each authority was calculated and scored accordingly. Local authorities where the highest average utilisation rates were found were given a score closer to 10, while those with lower utilisation rates were assigned scores closer to 0. Local authorities without surveyed lorry parks and thus could not be scored were assigned a score of 0.

The final score was on a scale of 0 to 20, with up to 10 points allotted for off-site parking issues and up to 10 points for on-site lorry park utilisation issues. A local authority scoring 20 indicates critical

lorry parking issues, necessitating immediate support and attention. On the other hand, a score nearer 0 implies negligible issues. Figure 6-1 displays a map of England, colour coded and divided by local authority, highlighting hotspots and critical issues. From Figure 6-1, Table 6-1 shows the ten local authorities with the highest scores. Local authorities which scored at least 12 are presented in a longer table in Appendix A. It can be said that the top 10 local authorities have severe issues with both on-site and off-site parking. Local authorities that have not been surveyed mainly because they do not lie within 5kms of the SRN are shown on the map in white. This means that there is insufficient data to assess lorry parking in that area.

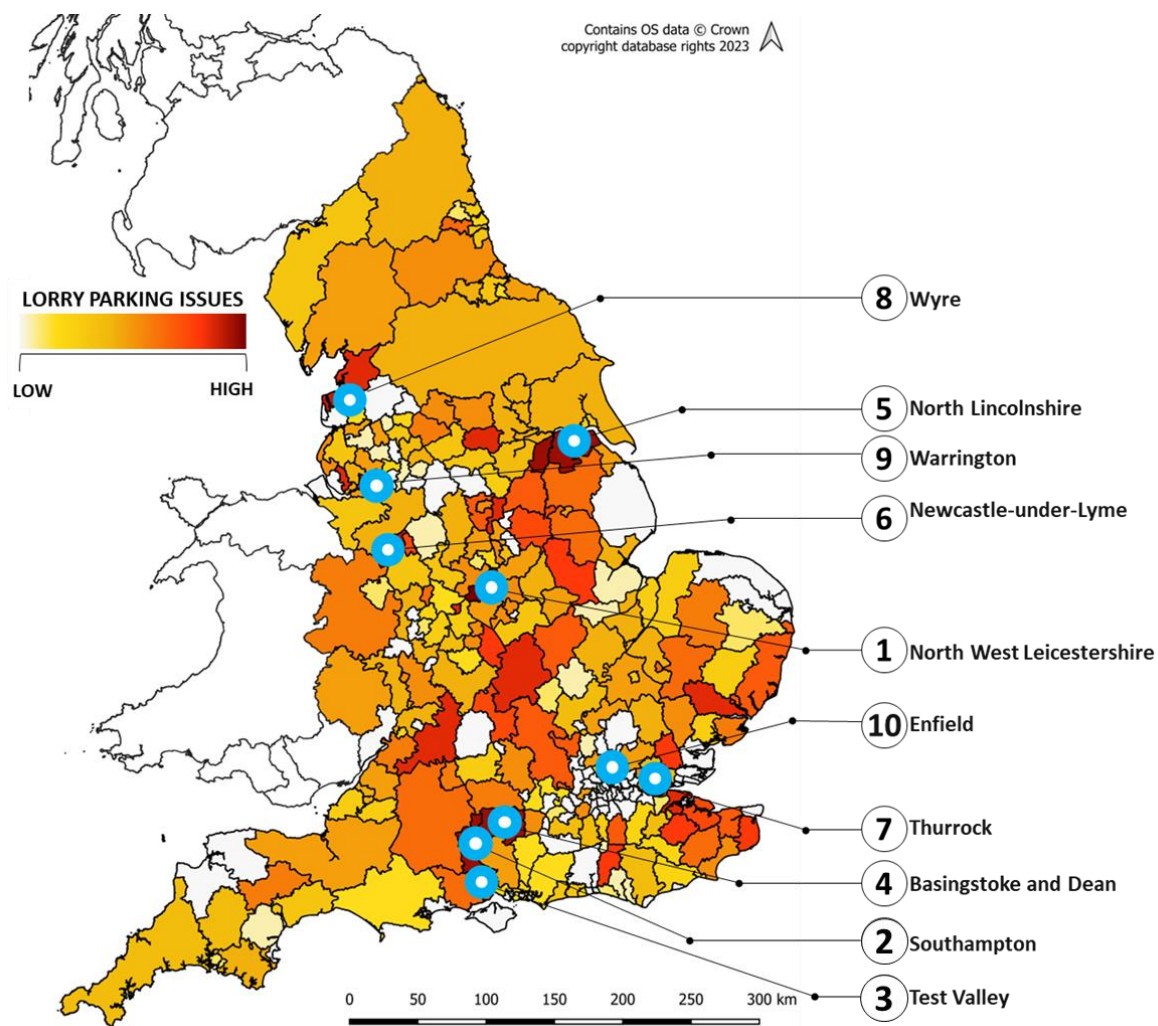


Figure 6-1: Lorry parking issues by local authority

Top 10 Local Planning Authority Areas by unmet demand

The top 10 local authorities with lorry parking issues are affected by various factors contributing to their challenges, although the specific issues vary between them. It is essential to identify the precise factors causing these problems to devise tailored solutions for improved lorry parking. Understanding the specific issues will also help predict how the demand for lorry parking might change in the future, enabling more effective planning and resource allocation.

Local Authority	Off-site Score /10	On-site Score /10	Total Score /20
1) North West Leicestershire	9.4	9.7	19.1
2) Southampton	9.2	8.8	18.0
3) Test Valley	8.5	9.2	17.7
4) Basingstoke and Dean	7.5	9.9	17.4
5) North Lincolnshire	8.7	8.6	17.3
6) Newcastle-under-Lyme	7.1	9.7	16.8
7) Thurrock	7.6	9.2	16.8
8) Wyre	8.3	8.4	16.7
9) Warrington	7.8	8.5	16.3
10) Enfield	8.7	7.3	16.0

Table 6-1: Local authorities with the worst lorry parking issues

- North West Leicestershire:** North West Leicestershire achieved the highest score of 19.1 in the analysis. North West Leicestershire is in the golden triangle and has a well-connected SRN, including the M1, which converges with the A42, A453, and A50, linking Birmingham, Nottingham, and Derby, leading to substantial freight movement and activity. During the survey, Moto Donington Park was 155% utilised, resulting in extensive off-site parking on the A42 and local major road network (MRN), notably along the A511 near Bardon Hill and Coalville.

Summary: reason for lorry parking issues:

- Transitory SRN routes (responsibility of National Highways)
 - Operating Centres (responsibility of the LPA)
- Southampton, Test Valley and Basingstoke and Dean:** The ports of Southampton and Portsmouth are gateways for Britain's deep sea and cross-channel freight. Southampton is the UK's top export port and has the nation's second-largest container terminal. Between Q1 2022 to Q1 2023, Southampton, along with Medway and the Rivers Hull and Humber, experienced the largest increase in freight tonnage. Its strategic location and links via road and rail make it a pivotal hub for international trade.

The Port of Southampton handles between 750,000 and 1,000,000 lorries annually. This places significant pressure on the SRN and lorry parking facilities. The M3, linking the region to London, and the A34, connecting the region to the Midlands, are heavily used by lorries arriving from (or going to) various parts of the UK. Consequently, parking issues also arise in Test Valley and Basingstoke and Dean, as the SRN serves a vital transitory role in this area.

Summary: reason for lorry parking issues:

- Major ports (responsibility of the British Ports Association [BPA])
- Transitory SRN routes (responsibility of National Highways)
- **Thurrock and Enfield:** Thurrock faces severe lorry parking issues partly due to London Gateway expansion. Before the pandemic, London Gateway was one of the fastest-growing ports globally. In 2022, it led the UK's volume growth in overseas movement, experiencing a 14% increase in the same year, demonstrating its resilience and strong recovery post-pandemic.

The growth of London Gateway has led to mounting challenges in lorry parking in Thurrock. All local lorry parks are operating at over 100% capacity, and several lorry parks in adjacent local authorities are also experiencing similar high utilisation rates. Therefore, a significant number of lorries are forced to park in laybys and industrial estates on the A13. The M25 (passing through Thurrock after the Dartford Crossing [A282]) is part of the transit corridor with large volumes of freight traffic heading north. Much of this traffic comes from the M2 and M20, flowing from ports like Dover and the Medway.

Enfield, located along the north section of the M25, has critical lorry parking challenges. The lorry parks in Enfield, as well as Hertsmere to the west and Epping Forest to the east, are all operating at over 100% capacity, indicating severe strain on available parking facilities. This section of the M25 carries large volumes of HGVs due to its connections with the M1, A1(M), M40, and M4. Additionally, lorries traveling from southwest England may travel through Enfield to reach Felixstowe and Ipswich. Enfield also has a very high number of operating centres (196), which is roughly the same as Wakefield (199) and Poole (185). The convergence of traffic from various major routes, ports and operating centres significantly contributes to the high unmet demand in Thurrock and Enfield.

Summary: reason for lorry parking issues:

- Major ports (responsibility of the British Ports Association [BPA])
- Transitory SRN routes (responsibility of National Highways)
- Operating Centres (responsibility of the LPA)
- **North Lincolnshire:** The M180 links the Humber ports (such as Grimsby and Immingham) to the East Midlands and facilitates freight movement between Doncaster and Hull (as an alternative to the M62). Immingham (120), Scunthorpe (198), Grimsby (166), and smaller centres like Brigg (48) have a notable density of operating centres, while Doncaster (561) and Hull (477) exhibit even higher concentrations.

These latter two centres, though not in North Lincolnshire, significantly contribute to the local demand for lorry parking facilities. The existing lorry parking facilities in North Lincolnshire are often near or over capacity, leading to substantial off-site parking, particularly in industrial estates around Scunthorpe and Immingham.

Summary: reason for lorry parking issues:

- Major ports (responsibility of the British Ports Association [BPA])
- Transitory SRN routes (responsibility of National Highways)
- Operating Centres (responsibility of the LPA)

- **Newcastle-under-Lyme, Warrington, and Wyre:** These three areas are on the M6 between the West Midlands and North West England. The M6's strategic location and extensive coverage make it a primary route for the movement of goods and commercial traffic between the West Midlands and Scotland. The road's importance for freight is further amplified by its connections to major ports, such as Liverpool.

Newcastle-under-Lyme and neighbouring Stoke-on-Trent are a critical convergence point where major roads, the A50, A52, and M6, intersect. This area serves as a 'gateway to the north' for freight from significant conurbations like Birmingham, Derby, Leicester, and Nottingham (collectively part of the golden triangle). Stoke-on-Trent is a significant freight generator with 566 operating centres, surpassing cities like Hull (277) and Newcastle upon Tyne (292), and on par with Southampton (574). Goods traffic heading to the North West will often converge on the M6 around Newcastle-under-Lyme, creating a bottleneck of freight movements. The resulting high demand for lorry parking exacerbates off-site parking issues, particularly on the A500.

Warrington has significant lorry parking demand due to its position as a vital transit point along major corridors like the M6, M62, and the M56. Warrington handles substantial freight flows from Manchester, Leeds, and other above-mentioned towns and cities to the south, like Birmingham. A lot of freight in this area is coming from or going to the Port of Liverpool (one of the UK's largest ports), catering for various types of freight (such as general cargo, containers, Ro-Ro, and vehicles). Other freight movements could include those heading north to Lancashire or south west to Wales. Warrington, like other conurbations between Manchester and Liverpool, is an attractive location for distribution centres and hence high demand for off-site and on-site parking.

In Wyre, the M6 forms part of the route connecting the North West England to Scotland. Freight from places with a significant number of operating centres like such as Preston, Liverpool, and Manchester, along with freight traffic from the M65 (including Burnley and Blackburn) and M55 (including Blackpool), converge onto the M6 before going through the Wyre area. This concentration of freight traffic forms a bottleneck, intensifying the pressure on lorry parking facilities and exacerbating the demand for off-site parking solutions.

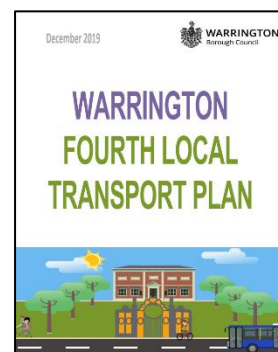
Summary: reason for lorry parking issues:

- Major ports (responsibility of the British Ports Association [BPA])
- Transitory SRN routes (responsibility of National Highways)
- Operating Centres (responsibility of the LPA)

Actions and Responsibilities: Local Transport Plans (LTPs)

In England, LTPs are vital to understand how an area will address transport issues and what actions are needed to improve the movement of people and goods. Such plans come in two types: the LTP and Local Implementation Plans (LIPs). These plans are created by strategic transport authorities, like county councils and local authorities. They look ahead over several years, usually around five, and are submitted to the DfT. Each of the ten LPAs mentioned above have LTPs, albeit their focus on lorry parking improvements varies greatly.

Warrington's LTP is a good example where lorry parking has been considered in policy and planning. In the LTP4 (2019), Warrington outlines an ambition to provide additional lorry parking facilities and ensure existing sites (namely Lymm Truck Stop, Bruntwood Services and Let's Eat Café) are adequate for drivers with an acceptable level of utilisation. In Policy FM15 and FM16, it is explicitly stated (respectively) that *"We will review local lorry parking facilities and, if required, identify potential locations for additional facilities"* and *"We will use an enforcement regime to control inappropriate freight parking."*



Since Warrington's release of LTP4, the issue of insufficient lorry parking remains significant, with a high level of unmet demand. Nevertheless, Extra Services is in the process of establishing a new MSA called Birchwood. The legal decision favoured Extra in May 2022, and adjustments to Birchwood MSA's layout were given the green light in June 2023.

Situated at Junction 11 of the M62, the Birchwood MSA will comprise a facilities building, potentially a 100-bedroom hotel, a service yard, fuel and electric charging stations, parking spaces, lorry parking as well as landscaped and amenity areas. This MSA aims to ease the strain on overcrowded nearby lorry parks and enhance the facilities available to drivers on the M6, M62 and M56. Figure 6-2 visualises plans for the newly approved Birchwood MSA site.

WARRINGTON: TACKLING UNMET DEMAND

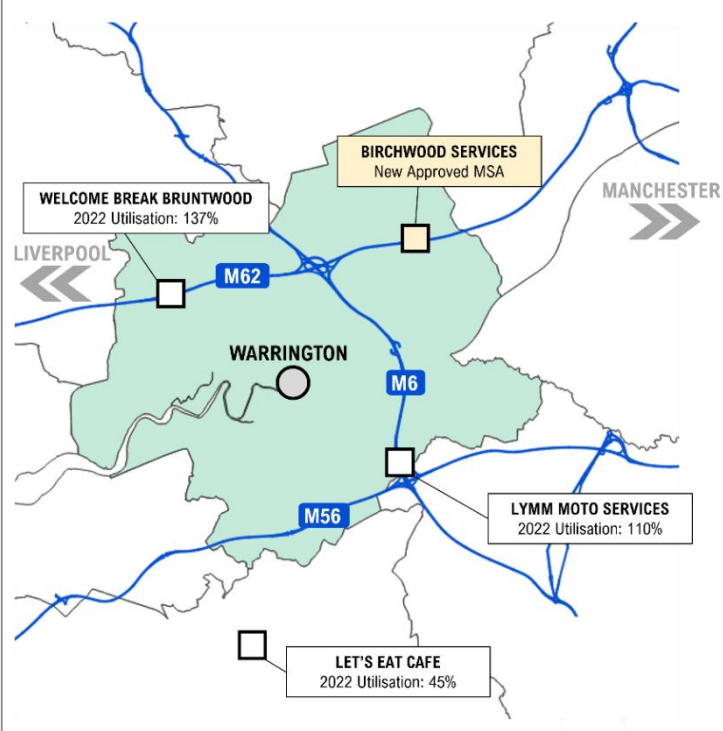


Figure 6-2: Proposed Birchwood Services in Warrington, M62 J11

The remaining nine leading local authorities in England with the most substantial unmet lorry parking demand adopt (or do not adopt) various plans to address the issue of lorry parking. Each local authority is summarised below and in Table 6-2.

Like Warrington, North Lincolnshire and Thurrock adopt LTPs which address lorry parking issues:

- **North Lincolnshire:** The 2011-2026 LTP does identify a need for better lorry parking provision. The earlier LTP3 identifies a short-term option to extend existing laybys or create new ones. In the longer term, establishing a dedicated lorry park is considered. However, this depends on having enough suitable land available. Furthermore, the feasibility of a dedicated lorry park hinges on the participation of an interested operator willing to manage it. In April 2023, a renewed application was made to turn agricultural land in North Killingholme (close to the Port of Immingham) into a 30 space lorry park².
- **Thurrock:** Thurrock's transport plan for 2013-2026 is built upon LTP3 and focuses on shifting towards demand-responsive transport for improved accessibility. The plan emphasises the requirement for 24-hour lorry parking. Thurrock Council is actively collaborating with National Highways and other relevant bodies to minimise the impact of lorry parking on local roads, including residential areas. To achieve this, the Council intends to explore the feasibility and implementation of secure 24-hour lorry parking facilities and suitable amenities for drivers at West Thurrock, Tilbury, and London Gateway. These efforts are likely to be complemented by implementing lorry parking restrictions in other areas³. In March 2021, planning approval was granted for a new truck stop with 207 spaces in the west of Grays⁴.

The other local authorities' LTP's either lack clarity regarding enhancements to lorry parking or do not address the issue:

- **North West Leicestershire:** In the Leicestershire LTP (2011-2026), there is a focus on the lorry route network (LRN), aiming to sustain a network that facilitates efficient freight movement while respecting local communities. However, there is no indication of any policy or strategies aimed at enhancing lorry parking facilities. The plan only suggests enhancing information provision for lorry drivers about available facilities.
- **Southampton:** Southampton City Council currently run the 'Connected Southampton' programme which seeks to improve all areas of local transport by 2040. However, the ongoing LTP4 implementation plan (2022-2025) does not include any provision for improved lorry parking facilities. The Southampton City Vision indicates that forthcoming plans will address freight, heavy goods vehicle (HGV) movements, and an 'access plan', though it is unclear what exactly this will entail for lorry parking.
- **Test Valley:** Test Valley is governed by Hampshire County Council's (HCC's) LTP4 (2022), which sets a vision for the upcoming three decades. However, LTP4 does not lay out any vision or plans for enhancing lorry parking facilities.
- **Basingstoke and Deane:** Like Test Valley, Basingstoke and Deane falls under HCC, thus there is no mention of lorry parking provision in the LTP4. HCC have produced a Basingstoke Transport Strategy (2019), albeit this also lacks any mention of improvements for lorry parking provision.

² <https://www.grimsbytelegraph.co.uk/news/local-news/lorry-park-planned-north-lincolnshire-8351798>

³ https://www.thurrock.gov.uk/sites/default/files/assets/documents/strategy_transport_2013.pdf

⁴ <https://thurrock.nub.news/news/local-news/green-light-for-new-lorry-park>

- **Newcastle-under-Lyme:** The 2011 Newcastle-under-Lyme Local Plan mentions lorry parking, but its adoption from 2003 renders it outdated. The plan highlights that no replacement site was initially suggested for the closed Friars Road lorry park (closed at the end of the 1990s), unless a clear necessity arose in the future, which it subsequently has. The broader Staffordshire County Council LTP (2011-2026) similarly neglects the need for improved lorry parking provisions, despite acknowledging that there is significant aggregate production in the region.
- **Enfield:** Though Enfield falls under the Mayor of London’s Transport Strategy, Enfield Council have also produced an LIP (LIP3 2019-2041)⁵. However, the council’s LIP does not mention the provision of lorry parking or plans/requirements to make improvements over the next two decades.
- **Wyre:** The Wyre Local Plan (2011-2032) was last adopted in 2019 and does not cover the provision of lorry parking facilities or any required improvements. Appendix 17, Highway Implications of the Proposed Wyre Local Plan⁶ (from report - *Statement of Consultation, Highway comment on consultation responses to the Draft Wyre Local Plan*) also fails to document existing lorry parking issues in Wyre.

Local Authority (in order of most severe analysis score)	Covers Lorry Parking Improvements?
1) North West Leicestershire	No
2) Southampton	No
3) Test Valley	No
4) Basingstoke and Dean	No
5) North Lincolnshire	Yes
6) Newcastle-under-Lyme	No
7) Thurrock	Yes
8) Wyre	No
9) Warrington	Yes
10) Enfield	No

Table 6-2: The acknowledgement of lorry parking provision in LTPs and LIPs

All ten local authorities must recognise and outline strategies for addressing lorry parking concerns in their future LTPs and LIPs. This recognition is vital to support proper infrastructure planning, transport integration, driver well-being, and to foster a well-rounded and efficient system that supports the UK's freight industry.

The seven local authorities that are yet to address lorry parking issues could learn from examples like Warrington, Thurrock, and North Lincolnshire. They should incorporate policies and options in future LTPs/LIPs to future-proof driver facilities in their respective regions.

Although the above section has highlighted the 10 areas with the highest score there are several more Local Authorities that should address the need for additional lorry parking facilities.

⁵ https://www.enfield.gov.uk/__data/assets/pdf_file/0019/4825/enfield-transport-plan-2019-2041-roads.pdf

⁶ <https://www.wyre.gov.uk/downloads/file/657/sd007i-appx-17>

Limitations to the Spatial Approach

Studying lorry parking demand by local authority helps grasp regional dynamics of parking problems. Yet, this approach relies solely on the 2022 audit survey data, which focused on the SRN, and the scope did not extend to significant MRN routes with heavy freight traffic and parking demand. There are potentially three major limitations to the spatial analysis used in this study, and include:

- **Not addressed the MRN:** An example of this can be seen in Dorset and Bournemouth, Christchurch, and Poole (BCP) in South West England. BCP sits south east of Dorset and appears to have no lorry parking issues in Figure 6-3. The new BCP Council was formed on April 1 2019, through a local government reorganisation that merged the former borough councils of Bournemouth, Christchurch, and Poole into a single unitary authority.

The A31 running through New Forest and Dorset doesn't pass through BCP. Hence, BCP wasn't surveyed in the 2022 audits. Despite this, the combined population of these conurbations is about 400,000, comparable to Bristol and, due to being a tourist destination, can attract over 1 million visitors and the commensurate freight traffic during peak weeks in the summer. BCP has a higher population than the whole of the rest of Dorset which has a much bigger geographical area.

Therefore, there is likely to be significant freight movement via the MRN, for example down the A338 to Bournemouth and Christchurch and A3049/A350 to Poole. The survey and subsequent analysis fail to recognise this and so areas in white on the map need to be considered carefully and potentially may need future investigation.

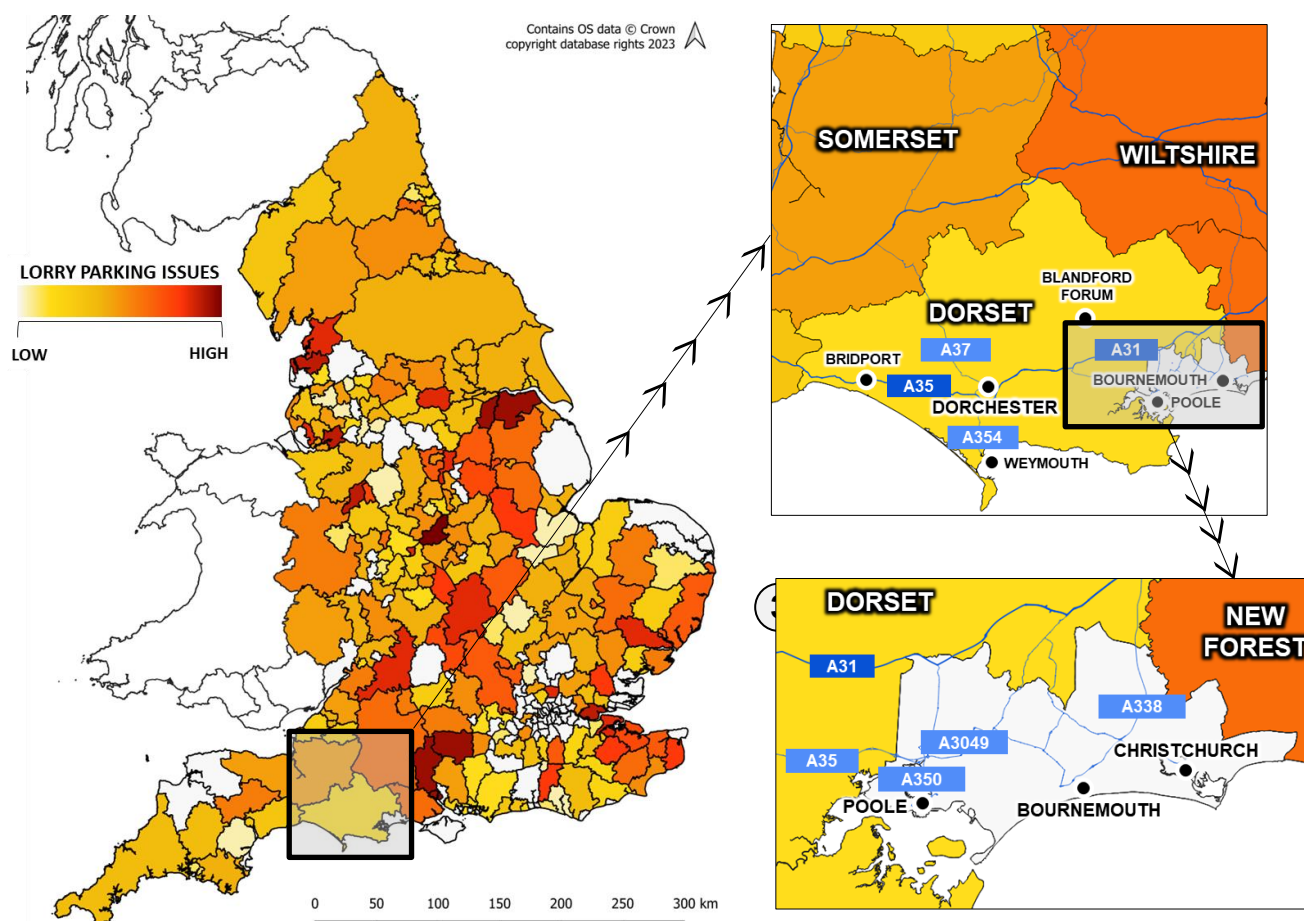


Figure 6-3: Importance of the MRN in BCP

- **Understanding Route Choice:** route choice plays a significant role in affecting freight movement across the country. The selection of a specific route can have various impacts on the efficiency, cost, and overall success of transporting goods. For example, opting for shorter and more direct routes can reduce travel time, leading to faster deliveries and potentially lower costs, or choosing routes with well-maintained roads can reduce the risk of breakdowns and delays. There are multiple other factors that affect route choice, such as regulatory considerations (i.e. weight and height limits) or even the local level of crime.

The reason why more straightforward routes between Southampton and Exeter are underutilised might be due to route choice. For instance, in Figure 6-4, freight movement predominantly follows the red and purple arrows rather than the green ones. This preference for the A303 route across Wiltshire and Somerset, despite a similar travel time, is influenced by factors such as better road infrastructure (e.g. more dual carriageway), better journey time reliability, increased lorry parking options, and practicality, even though the Dorset (green arrow) route may appear 'more logical'.

The purple route may be chosen over the red route as it avoids Salisbury and longer stretches of single carriageway. Though the route to the A303 via the A34 (purple) is a longer distance than the A36 (red), the journey time is roughly the same given less congestion and quicker, wider roads. For example, congestion and uncertainty of traffic in Salisbury can make freight movement less efficient on the A36, for there is more stop-start driving and overtaking, which is difficult or not possible for HGV drivers.

For this reason, it is important that local knowledge from STBs and LPAs is considered to comprehend high and low parking demand across different routes.

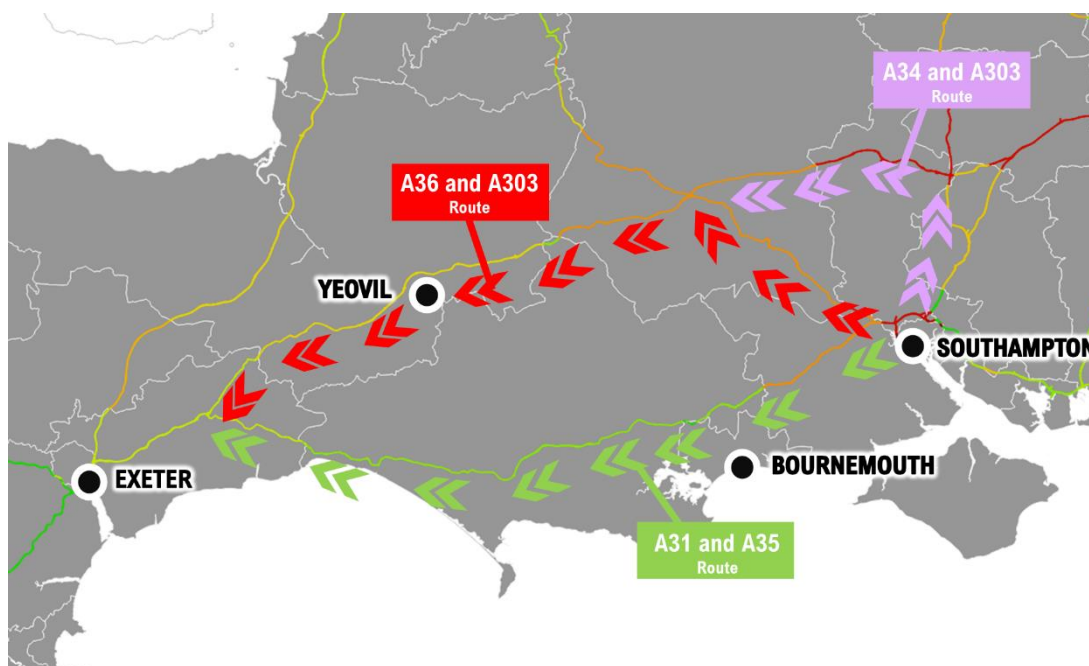


Figure 6-4: The primary route choices between Southampton and Exeter

- Acknowledging Local Geographies:** It's important to consider local geographies when assessing the need for lorry parking facilities. For instance, the A1(M) (to the south of North Yorkshire) does not face as severe lorry parking issues compared to nearby areas like Leeds and Wakefield. However, a closer look reveals that the sections of the A1(M) (west of Selby) experience high lorry parking utilisation and HGV flows, indicating a need for improved lorry parking provisions in this area. The region is shown in Figure 6-5.

This section of the A1(M) in North Yorkshire is at the centre of regional distribution. It connects major areas such as Leeds, Wakefield, Selby, North Lincolnshire, Bradford, Huddersfield, York, and Doncaster, all of which are significant operating centres and freight generators. Despite running through North Yorkshire, sections of the A1(M) are as close to Leeds city centre as they are to Selby. Therefore, it is essential to consider the influence and freight needs of Leeds when planning lorry parking facilities on this part of the SRN; parts of North Yorkshire, Leeds and Wakefield are under the same unofficial freight boundary.

The analysis should also consider local freight routes and National Highways' Route Strategies (discussed later in this report). The evaluation should aim to identify any influences on the A1(M) from neighbouring roads such as the M62, M180, and A64. It's noteworthy that the A1(M) in North Yorkshire is only approximately 2 miles north of the point where the M62 and A1(M) intersect in Wakefield. So it is important to recognise cross-boundary issues. So as an example even though Selby (North Yorkshire) does not have a particularly high lorry parking score, as neighbouring authority Wakefield does experience high lorry parking demand, constructing a lorry park on the A1(M) in North Yorkshire could potentially alleviate some of the issues and consequently reduce Wakefield's unmet demand.

In summary, Leeds, Wakefield, and North Yorkshire received varying scores in the analysis. Nevertheless, it's crucial to recognise that the combined urban areas of Selby, Leeds, and Wakefield fall within the same freight catchment area. This collective perspective should be considered when making decisions about new or improved facilities that extend beyond the local authority level.

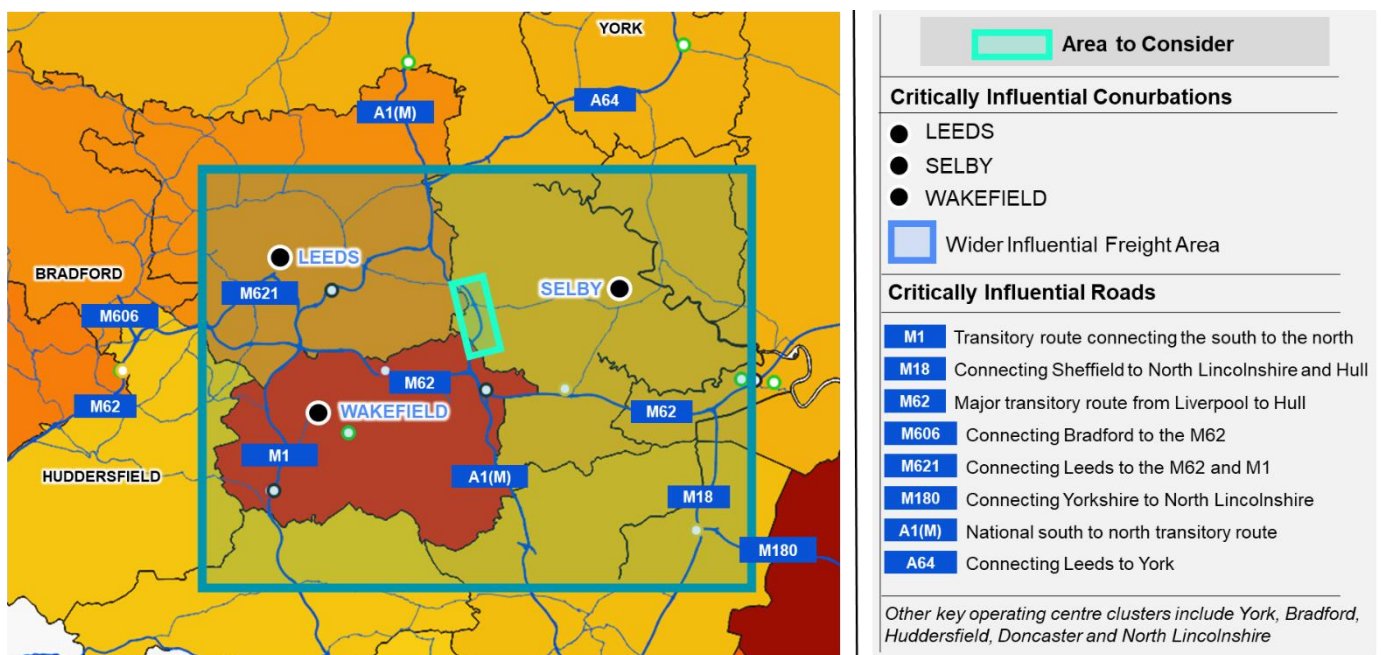


Figure 6-5: The consideration of wider freight geographies across local authority boundaries

Additional demand indicators – number of critically utilised lorry parks

While the evaluation focuses on lorry park utilisation and the proportion of offsite parking within an LPA, it's worth exploring other demand indicators. An additional metric, (not impacting the scores out of 20 discussed earlier), involves the count of LPA truck parks with 'critical' utilisation. The defined threshold for this (in agreement with the DfT) is 85%. This is important as drivers may waste time (and money) travelling to sites which are full, forcing them to seek alternative provision, either formal or informal. Aside from costs, this can be stressful and lead to drivers parking in locations that are not secure or do not provide adequate facilities as they may be going over their legally permitted driving time.

Table 6-3 shows the top 8 local authorities with the most critically utilised lorry parks. West Northamptonshire, in the Golden Triangle, has the most lorry parks critically utilised, followed by Westmorland and Furness in Cumbria, Thurrock, Wakefield and Somerset. North Northamptonshire, Wiltshire and Cheshire East also have 3 lorry parks critically utilised.

Figure 6-6 shows the national context and labels the 8 local authorities mentioned in

Local Authority	No. Lorry Parks at Critical Level	Local SRN	Primary Owner of Issue	Additional Notes
West Northamptonshire	5	M1, A5, A14	National Highways LPA	Part of the golden triangle. Major area for transport storage and warehousing facilities and distribution centres - hot spot for M1 goods movement
Westmorland and Furness	4	M6, A590, A66	National Highways	Primarily an issue with the M6 being the major route between England and Scotland
Thurrock	4	M25, A13, A1089	National Highways LPA BPA	Forms around M25 (major freight route) uses SRN routes linked to London Gateway. Large volumes of traffic also affect the site from Ports such as Dover to the Midlands and North
Wakefield	4	M62, M1	National Highways LPA	West Yorkshire Combined Authority and LTPs recognise a wider issue, given Wakefield is a focus for distribution centres and warehousing for the whole of Yorkshire. The region is also an economic powerhouse for freight given the M1 and M62 intersection
Somerset	4	M5, A303	National Highways	Critical connection to the far south West, Exeter and Plymouth, connecting to Bristol and London
North Northamptonshire	3	A14	National Highways LPA	Part of the golden triangle in Central England. Major area for Transport Storage and Warehousing Facilities and distribution centres. The A14 connects ports such as Felixstowe to central England and associated SRN, namely the M1 and the M6
Wiltshire	3	A303	National Highways	Connecting Plymouth to London
Cheshire East	3	M6	National Highways	Port of Liverpool connected to central England and London. Further, warehousing and distribution in Warrington.

Major route north of Birmingham connecting England to Scotland (Glasgow)

Table 6-3: There is a correlation between the demand indicators used for this study and this additional demand indicator, given it influences the overall lorry park utilisation metric. This is most evident with Thurrock, which scored highly in the local authority analysis and also appears in the additional demand indicator.

Local Authority	No. Lorry Parks at Critical Level	Local SRN	Primary Owner of Issue	Additional Notes
West Northamptonshire	5	M1, A5, A14	National Highways LPA	Part of the golden triangle. Major area for transport storage and warehousing facilities and distribution centres - hot spot for M1 goods movement
Westmorland and Furness	4	M6, A590, A66	National Highways	Primarily an issue with the M6 being the major route between England and Scotland
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Wiltshire	3	A303	National Highways	Connecting Plymouth to London
Cheshire East	3	M6	National Highways	Port of Liverpool connected to central England and London. Further, warehousing and distribution in Warrington. Major route north of Birmingham connecting England to Scotland (Glasgow)

Table 6-3: Additional Demand Indicator: Top 8 LPAs for no. of over utilised lorry parks

*BPA: British Ports Association

The local authorities in Table 6-3 are generally larger and accommodate a higher number of lorry parks, which consequently increases the likelihood of overutilisation across multiple lorry parking sites. Somerset and Westmorland and Furness respectively host the M5 and M6 which connect key parts of the country. High freight flows on these roads creates a high demand and utilisation of lorry parking. Wakefield and West Northamptonshire are similar, with the M62 and M1 running through them respectively. Issues in Wakefield and West Northamptonshire are exacerbated however, given they are key operating/distribution centre locations. Thurrock's parking challenges partly stem from its

port, London Gateway, which experiences substantial freight movement in and out of the country, resulting in heightened demand for lorry parking.

The presence of several lorry parks within each local authority indicates an understanding and acknowledgment of high demand. However, it prompts a question as to whether additional facilities are necessary, and the need to establish if lorry drivers are struggling to find adequate parking. This additional demand indicator can be used in conjunction with the previous analysis to give a deeper understanding of issues at the local authority level.

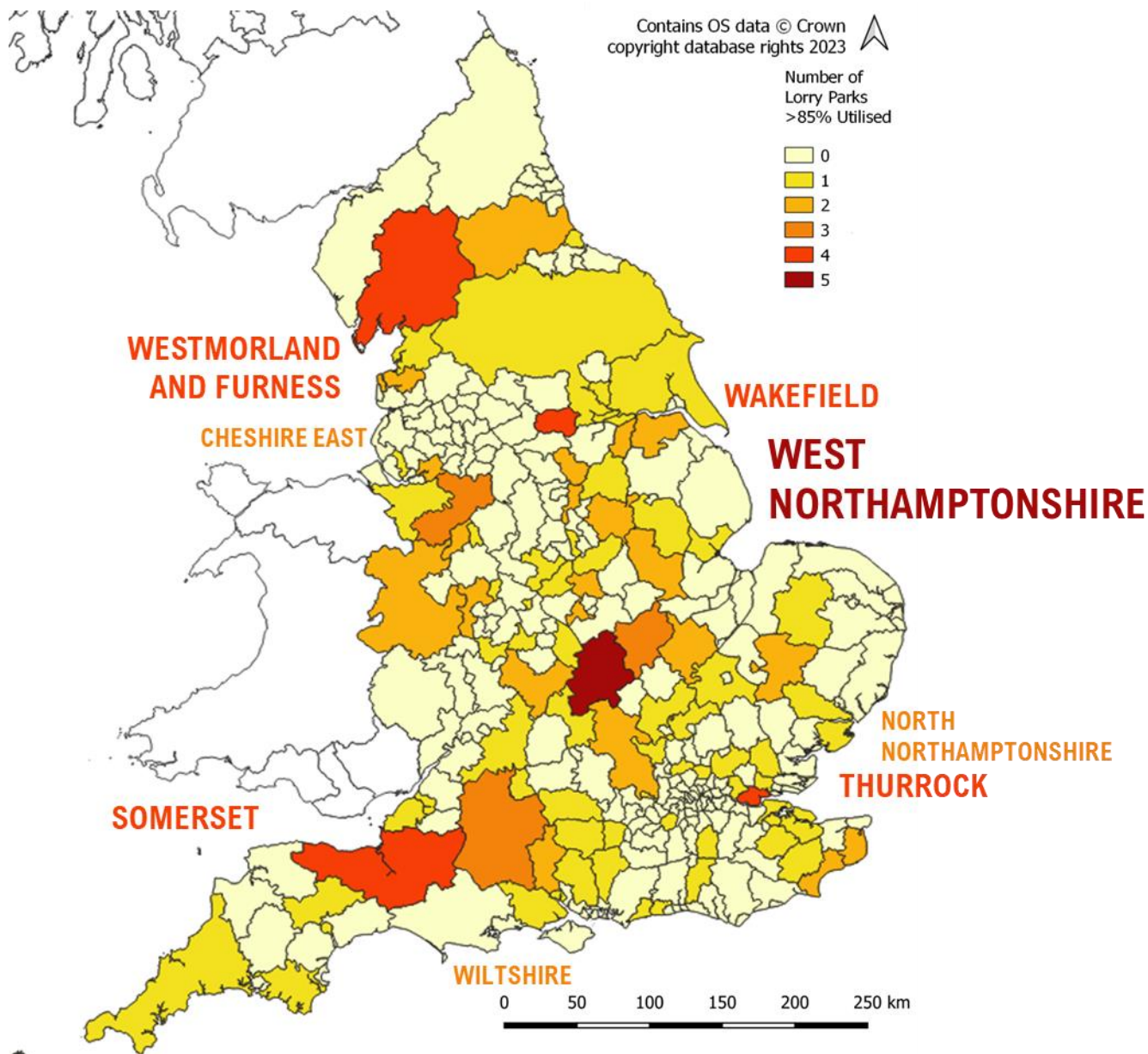


Figure 6-6: LPAs by number of Lorry Parks critically utilised

Lorry Parking Demand against the Strategic Road Network

Though the spatial analysis is local authority focused, it is useful to understand how this translates to the SRN. As a responsibility for National Highways, an understanding at the SRN level captures the dynamics of end-to-end freight movement, bridging local authority boundaries and identifying if a

parking demand issue is more a localised problem or a national corridor issue that one single local authority cannot be held accountable for.

It is essential to know which strategic routes are affected as this can influence the efficiency of freight movement. Lorry parking problems can disrupt the smooth flow of freight on inter-regional corridors, leading to delays, congestion, and inefficiencies in the supply chain. This not only affects the economy but also the comfort of drivers. Additionally, understanding these problems at the SRN level facilitates improved coordination with other policies and plans, such as potentially shifting certain freight from road to rail. Figure 6-7 illustrates the unmet lorry parking demand against the SRN.

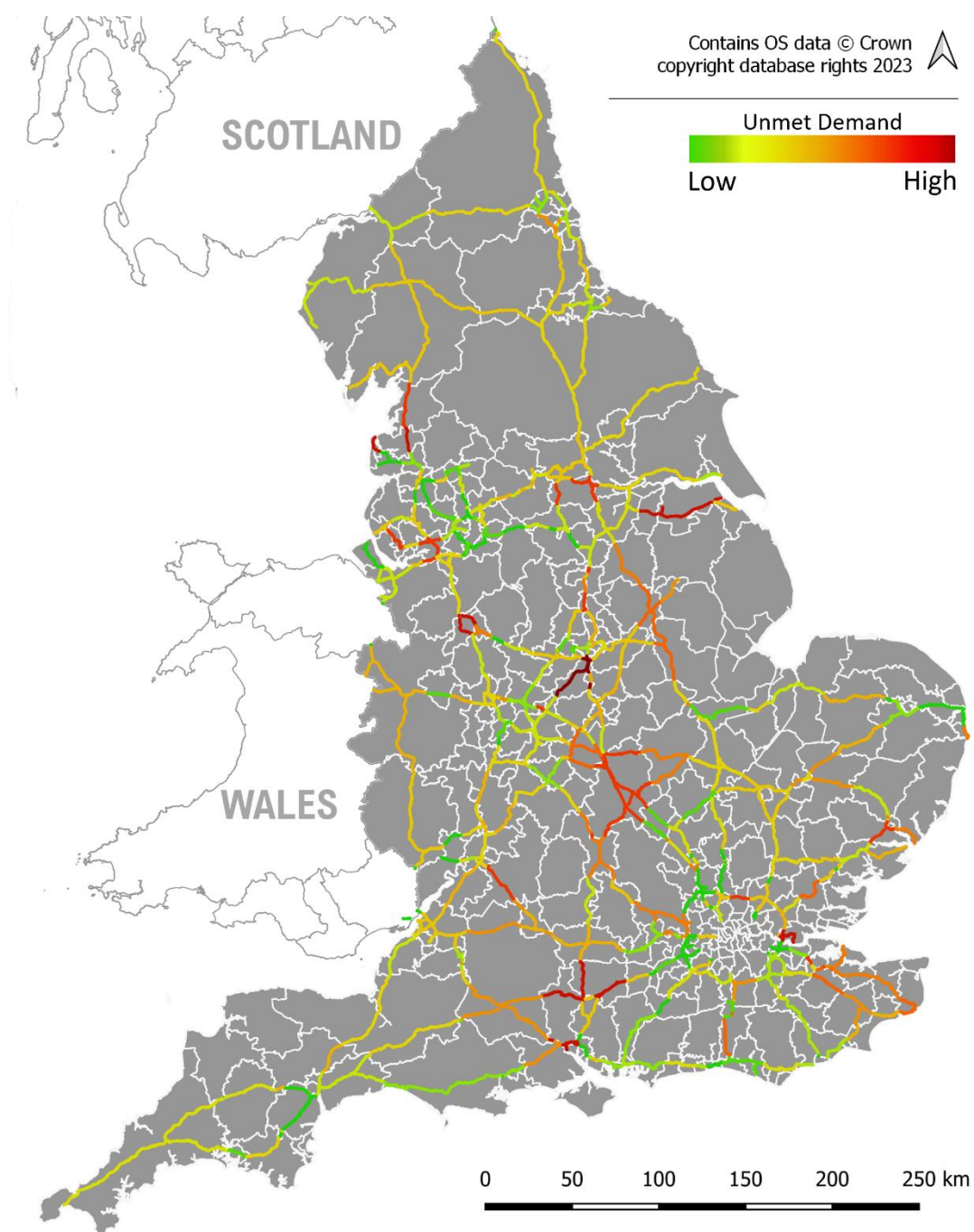


Figure 6-7. Unmet Lorry Parking Demand against SRN

This information will be provided to National Highways in a Power BI format, allowing integration into workstreams, responsibilities and projects which need to consider lorry parking demand.

Relationship between HGV flows and unmet lorry parking demand

Figure 6-8 demonstrates the relationship between unmet lorry parking demand and overall HGV flows on the SRN. It shows that some areas have a clear correlation between HGV flow and unmet lorry parking demand. This is most pronounced across the afore-mentioned 10 local authorities, with Newcastle-under-Lyme, Southampton, Thurrock and North West Leicestershire arguably being the most noticeable in this regard. Though there is some correlation between high flows and unmet demand, there isn't always a direct relationship. This is due to some areas being better served by existing provision or locations being more of a transit route or origin/destination, with HGVs passing through or completing their journeys and not needing to park in formal lorry parking facilities. An example of this can be seen on the M60 and western parts of the M25, where there are high flows but little unmet demand.

Ultimately this demonstrates the need for a nuanced approach to responding to the Local Plan Consultations and planning applications for new or improved provision.

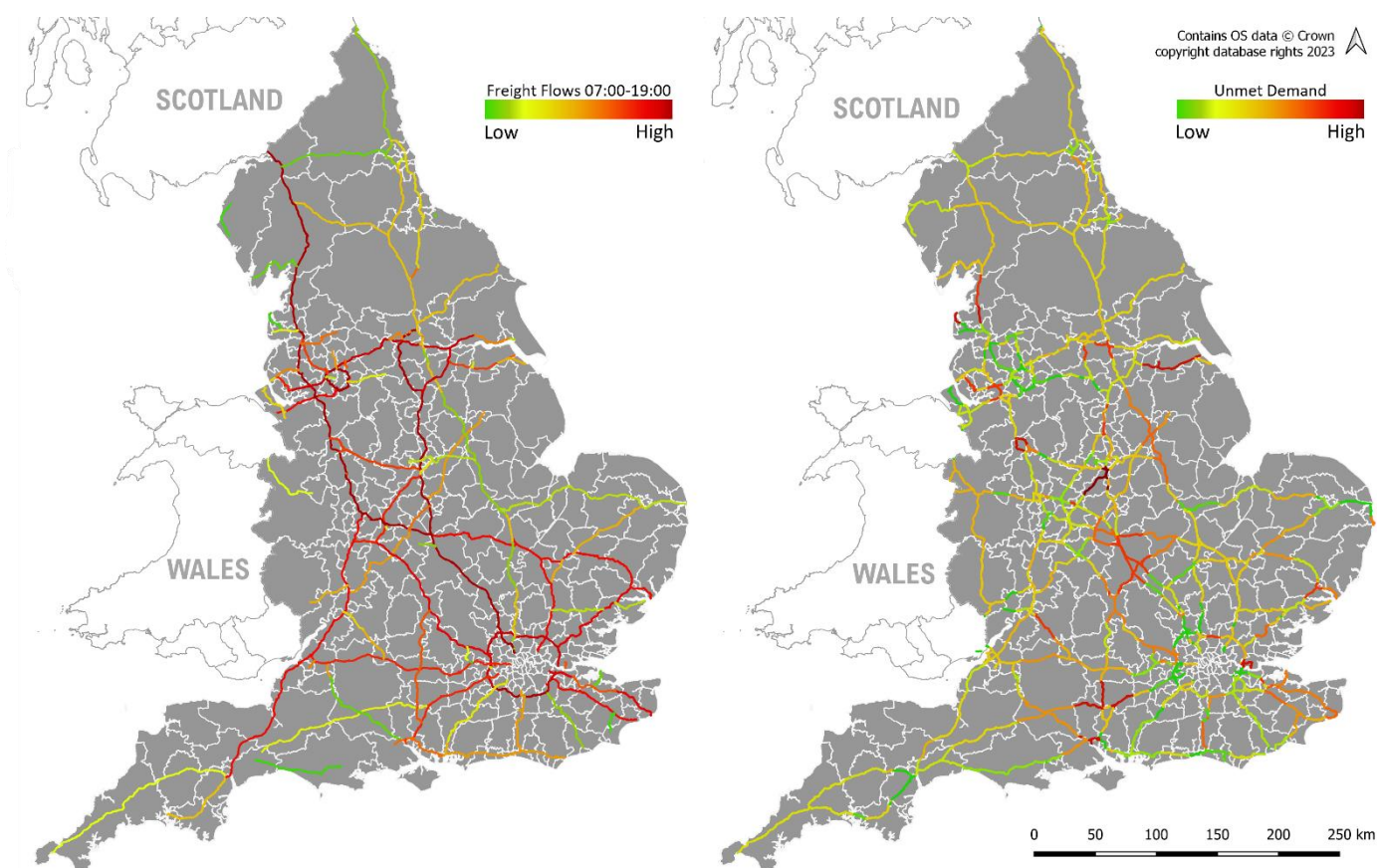


Figure 6-8: Map of HGV flows against unmet lorry parking demand (utilisation and off site parking)

Implications for Route Strategies Work

The National Highways Route Strategies Initial Overview Reports are one of the key steps of initial research in the development of the Road Investment Strategy (RIS). The Initial Overview Reports set out the mid to long term strategies and needs for the network.

It's important to incorporate the findings of the lorry parking demand assessment into actions aligned with the objectives of the 20 route strategies. To do this effectively, it is useful to visually map out where demand for lorry parking is not being met along these routes. This approach can also tackle 'cross-border' issues, where lorry parking solutions in one LPA can ease the burden on neighbouring authorities. Taking this comprehensive approach along the entire route can address demand throughout a corridor.

Figure 6-10 illustrates that unmet demand for lorry parking varies along the northern section of the M6 corridor between Birmingham and the Scottish Borders. Some sections experience high demand, notably around Newcastle-under-Lyme, Warrington and Wyre, while parts of the corridor have lower unmet demand for lorry parking (such as Birmingham and Preston).

The remaining Route Strategies can be found in the Route Strategies Report. It should be noted that, while the primary analytical focus of the route strategies analysis is not centred on local authorities, it utilises the established local authority scoring system used in this report. This scoring system serves as a reference to pinpoint areas of high demand along a strategic corridor or network of roads. The use of the local authority scoring system in conjunction with route strategies is a deliberate choice and aims to inform the next steps for addressing unmet demand.

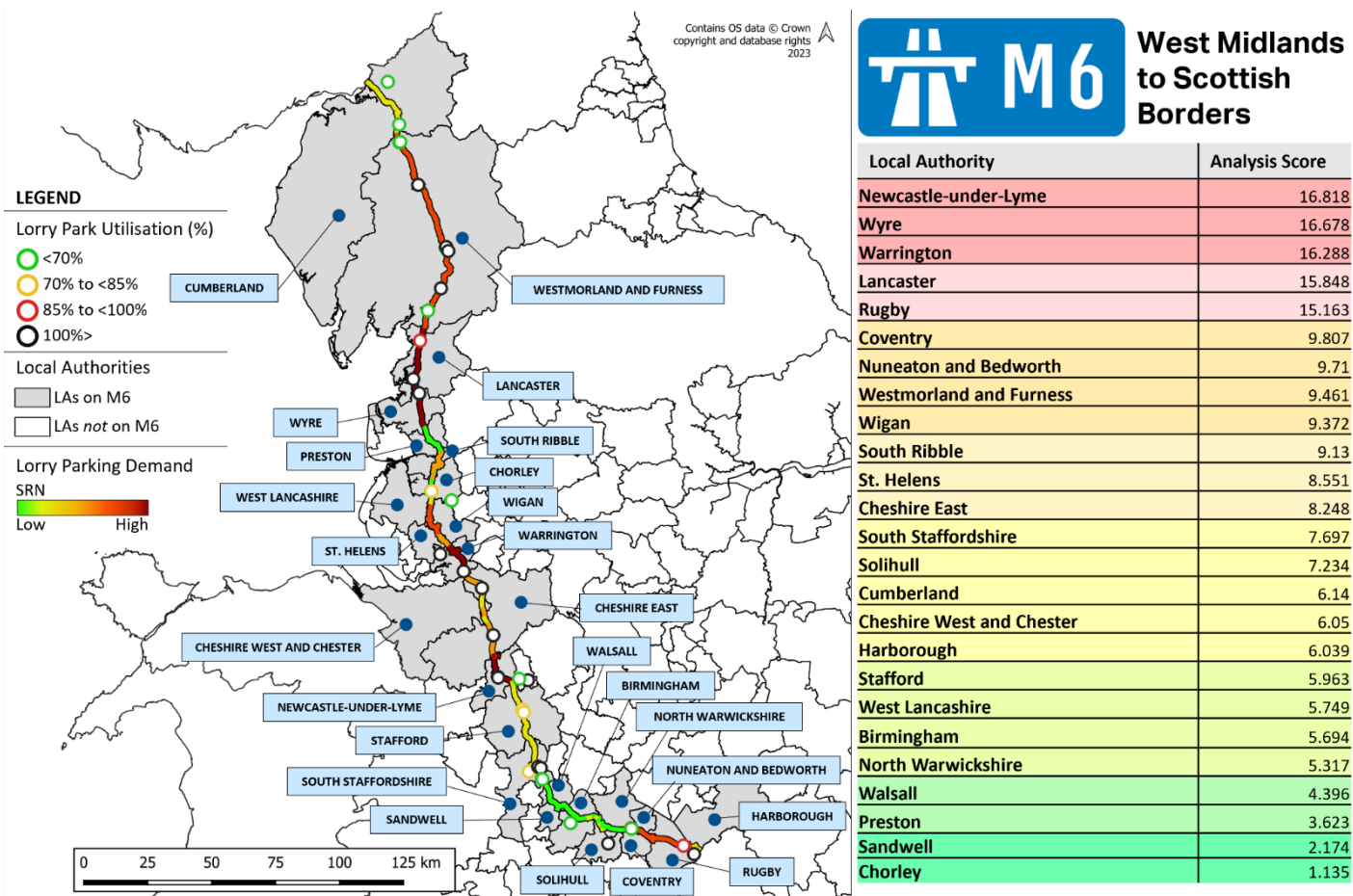


Figure 6-9: M6 West Midlands to Scottish Borders Route Strategy Corridor

7. Lorry Park Success Factors

The data shows that even in areas of high demand, some lorry parks are underutilised, despite a lack of capacity in nearby lorry parking facilities and relatively high levels of off-site lorry parking.

To understand why there are underutilised lorry parking facilities in areas of high demand, it is worth investigating examples where this occurs and identify associated factors. This exercise will help National Highways respond to planning applications and input into Local Plans in a more nuanced way. The survey results were assessed to identify areas where this occurred. Trends in the type of facilities at lorry parks were assessed to understand what makes a successful lorry park. This knowledge can be applied to ensure that future facilities or expansions cater to the specific needs of lorry drivers and the freight industry.

M6 Cumbria

The M6 in Cumbria is a largely rural section of the SRN, providing a north-south route between England and Scotland. Associated HGV movements are likely to be strategic in nature, representing long distance trips. There are also likely to be movements associated with centres of population such as Carlisle, however it is anticipated that the key generators of lorry parking demand would be HGV drivers undertaking north-south movements travelling through Cumbria.

Figure 7-1 highlights a section of the M6 corridor where concerns arise regarding the factors influencing the success of lorry parking. In this context, Figure 7-2 serves as a more detailed representation of Figure 7-1 to explain why certain lorry parks within a short segment of the network face either high or low utilisation.

Figure 7-2 demonstrates that a majority of lorry parking facilities in this area are operating at or beyond their capacity. However, 12 miles north of the heavily utilised AW Jenkinson Truckstop is the Moto Southwaite Services. During the 2022 Lorry Parking Survey, Moto Southwaite was only at (roughly) 50% capacity. Such contrast in utilisation rates prompted further investigation, which demonstrated that Moto Southwaite was significantly more expensive than other lorry parks in the area, costing over 40% more than AW Jenkinson Penrith Truckstop. Similarly, further south near M6 Junction 36, there is a small lorry parking area (Canal Garages) that provides 5 spaces. There are few facilities for drivers other than a 24-hour shop and refuelling facilities.

Even though Canal Garages is offered at no cost, it is clear that drivers are willing to find a middle ground and pay for dedicated lorry parking facilities, provided they include essential amenities like showers, security measures, and options for hot meals. If the pricing is too high, it might discourage drivers, but on the flip side, free parking without any security or facilities may be equally unappealing to them. In essence, a successful lorry park strikes the right balance between its pricing and the range of amenities and safety measures it provides to drivers.

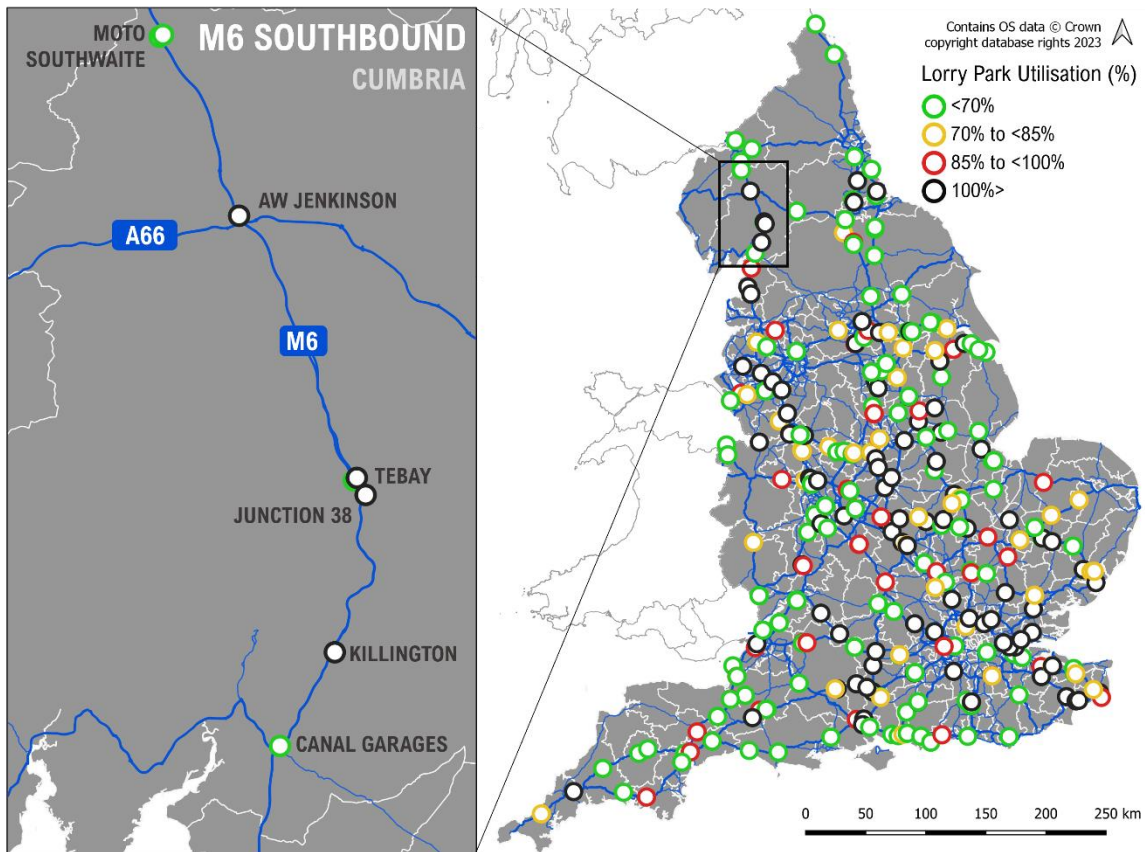


Figure 7-2: HGV parking demand in Cumbria

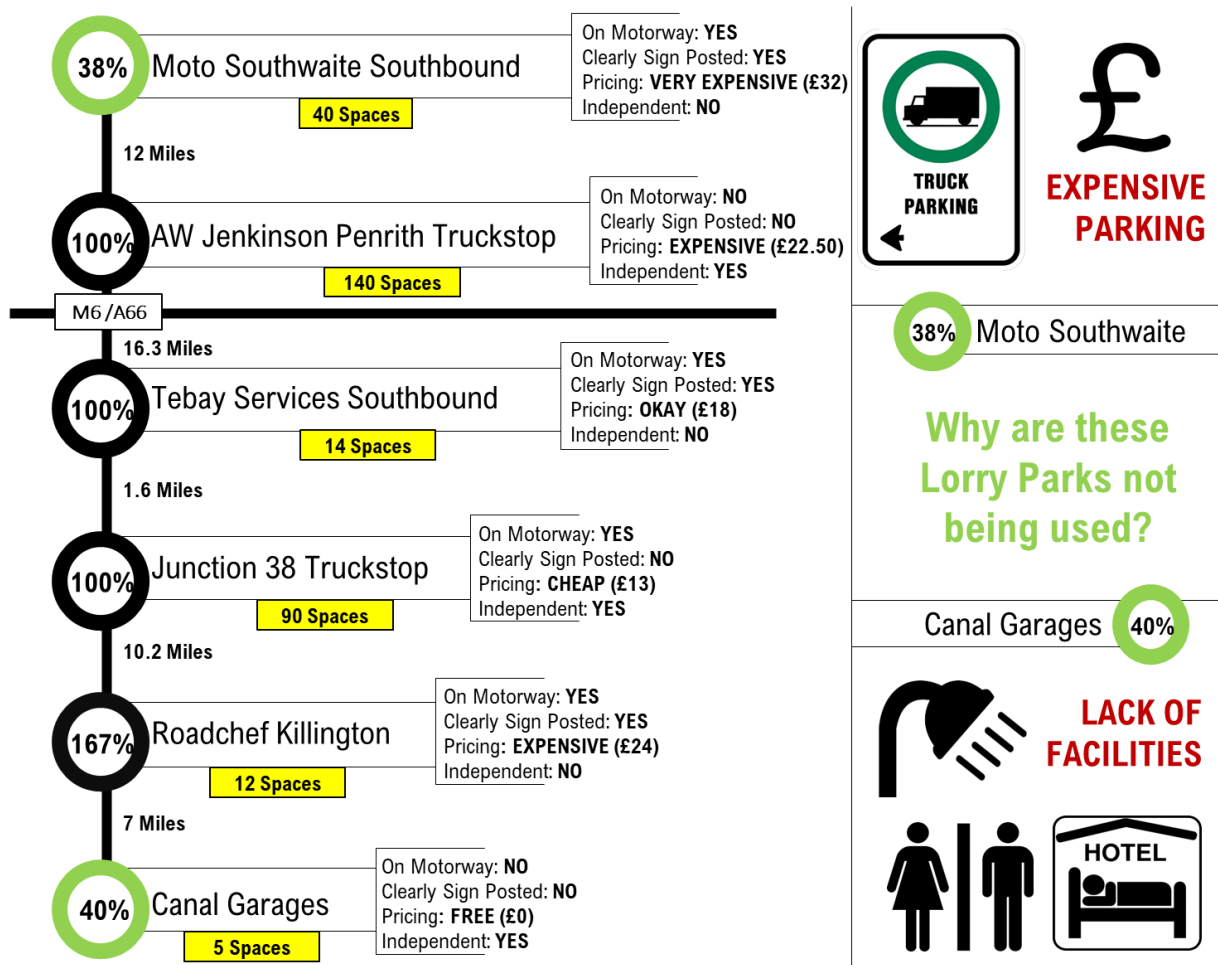


Figure 7-1: Lorry parking success factors in Cumbria

8. Summary and Conclusions

The 2022 DfT Lorry Parking Survey provides the ability to undertake in-depth analysis of the nature of lorry parking across England, showing where HGVs are parking within 5km of the Strategic Road Network.

The robust approach to the survey, first developed in 2010 and repeated in 2017 and 2022, has ensured that there is consistency in how data has been collected and analysed. This has already informed DfT policy in relation to support via additional match funding for better facilities and security measures.

We can therefore be confident that the data used for this assessment is robust and has been subject to the necessary assurance processes. Subsequent analysis has thus been based on a strong evidence base.

This LPDA has shown that many areas of England experience unmet demand for formal lorry parking facilities. This often leads to a prevalence of off-site parking in areas that lack even basic facilities and security measures and existing lorry parks operating above capacity. This in turn puts pressure on those facilities, for example resulting in too few showers for drivers or increasing the extent of wear and tear, thus accelerating the degradation of the lorry park.

The assessment undertaken here enables National Highways' colleagues to easily identify which local authorities are experiencing significant unmet demand. The analysis shows this is influenced by HGV flows, however there is not always a direct link between the extent of road freight traveling along the SRN in a particular area and the need for new facilities.

Creating a high-level (but considered) assessment using robust data means the scoring can be easily understood and applied by those less familiar with lorry parking and/or freight. Focusing on the LPA spatial context means that National Highways regional planning teams can more easily respond to queries such as Local Plan consultations or specific planning applications.

This information has been made available in Power BI, for easy integration into National Highways datasets, enabling quick analysis and easy comparison with other metrics. This has also been provided in table form in this report for quick reference.

This report also helps improve understanding of why some lorry parks are underutilised in areas of demand. This is important as factors such as price and a lack of facilities can lead to drivers not parking in formal facilities.

This assessment shows that there is a requirement for National Highways to support LPAs in accommodating new or improved lorry parks and the tool that has been developed can help partners assess the extent to which the need for new lorry parking provision is prevalent in their area. This can be an important resource in delivering new and better lorry parking, that will benefit the freight sector and all those who live and work in areas affected by informal lorry parking.

Appendix A Regional Assessments

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Appendix A: Local Authorities Scoring Above 12 in the Analysis

Local Authority	Off Site Parking Score /10	Utilisation Score /10	Provided Combined Score/20
North West Leicestershire	9.420289855	9.645390071	19.06567993
Southampton	9.22705314	8.794326241	18.02137938
Test Valley	8.502415459	9.14893617	17.65135163
Basingstoke and Deane	7.487922705	9.929078014	17.41700072
North Lincolnshire	8.695652174	8.581560284	17.27721246
Newcastle-under-Lyme	7.101449275	9.716312057	16.81776133
Thurrock	7.536231884	9.219858156	16.75609004
Wyre	8.309178744	8.368794326	16.67797307
Warrington	7.777777778	8.510638298	16.28841608
Enfield	8.743961353	7.304964539	16.04892589
Babergh	6.52173913	9.361702128	15.88344126
Medway	9.758454106	6.09929078	15.85774489
Lancaster	9.323671498	6.524822695	15.84849419
West Northamptonshire	7.68115942	8.156028369	15.83718779
Bolsover	8.84057971	6.879432624	15.72001233
Cotswold	6.280193237	9.290780142	15.57097338
Knowsley	5.700483092	9.787234043	15.48771713
Wakefield	7.342995169	8.085106383	15.42810155
Tamworth	8.45410628	6.808510638	15.26261692
Rugby	8.212560386	6.95035461	15.162915
Maidstone	5.217391304	9.858156028	15.07554733
Chelmsford	5.893719807	8.936170213	14.82989002
Dover	8.405797101	6.312056738	14.71785384
Mid Sussex	5.603864734	9.078014184	14.68187892
South Kesteven	7.29468599	7.021276596	14.31596259
Newark and Sherwood	8.06763285	6.028368794	14.09600164
Cherwell	6.859903382	7.092198582	13.95210196
Swale	8.937198068	4.680851064	13.61804913
Stoke-on-Trent	9.516908213	3.90070922	13.41761743
Dacorum	4.202898551	9.007092199	13.20999075
North Northamptonshire	7.874396135	5.319148936	13.19354507
North East Derbyshire	9.855072464	3.262411348	13.11748381
Canterbury	8.792270531	4.255319149	13.04758968
Buckinghamshire	3.526570048	9.503546099	13.03011615
Bassetlaw	6.231884058	6.737588652	12.96947271
East Suffolk	8.599033816	4.113475177	12.71250899
Tandridge	7.246376812	5.390070922	12.63644773
Ipswich	8.164251208	4.468085106	12.63233631
Ashford	4.541062802	7.730496454	12.27155926
New Forest	6.425120773	5.815602837	12.24072361
West Suffolk	7.198067633	4.893617021	12.09168465

ANNEX 19F

Appendix A – Response to Q19.0.15

Table 7. Bus Timetable Information (Monday to Saturday) – Updated with off-peak

Service	Route	Peak Frequency	Morning Off-Peak Frequency (~06:00)	Evening Off-Peak Frequency (~22:00)	Earliest Bus		Last Bus	
					Inbound (to EMG)	Outbound (from EMG)	Inbound (to EMG)	Outbound (from EMG)
skylink Derby	Leicester – Loughborough – Kegworth – EMG1 – EMA – Castle Donnington – Derby	15 mins	30 mins	30 mins	24-hour service	24-hour service	24-hour service	24-hour service
skylink Express	Nottingham – Clifton – EMG1 (non-stop)	30 mins	30 mins	60 mins	04:05	04:48 (Mon - Fri) 04:43 (Sat)	22:05	22:48
skylink Nottingham	Nottingham – Long Eaton – Castle Donnington – EMA – EMG1	20 mins	20 mins	60 mins	24-hour service	24-hour service	24-hour service	24-hour service
Airway 9	Horninglow – Burton – Ashby – Melbourne – EMA – EMG1	60 mins	60 mins	60 mins	04:05	05:25	20:15	21:30
my15	Ilkeston – Stapleford – Old Sawley – Castle Donnington – EMA	30 mins	30 mins (Mon -Fri) 60 mins (Sat)	60 mins	03:55	05:07	23:00	00:00

Table 8. Bus Timetable Information (Sunday) – Updated with off-peak

Service	Route	Peak Frequency	Morning Off-Peak Frequency (~06:00)	Evening Off-Peak Frequency (~22:00)	Earliest Bus		Last Bus	
					Inbound (to EMG)	Outbound (from EMG)	Inbound (to EMG)	Outbound (from EMG)
skylink Derby	Leicester – Loughborough – Kegworth – EMG1 – EMA – Castle Donnington – Derby	30 mins	30 mins	60 mins	24-hour service	24-hour service	24-hour service	24-hour service
skylink Express	Nottingham – Clifton – EMG1 (non-stop)	30 mins	30 mins	60 mins	04:05	04:43	22:05	22:48
skylink Nottingham	Nottingham – Long Eaton – Castle Donnington – EMA – EMG1	30 mins	30 mins	60 mins	24-hour service	24-hour service	24-hour service	24-hour service
Airway 9	Horninglow – Burton – Ashby – Melfourne – EMA – EMG1	60 mins	60 mins	60 mins	05:05	06:20	19:15	20:30
my15	Ilkeston – Stapleford – Old Sawley – Castle Donnington – EMA	60 mins	60 mins	60 mins	04:00	05:00	23:00	00:00

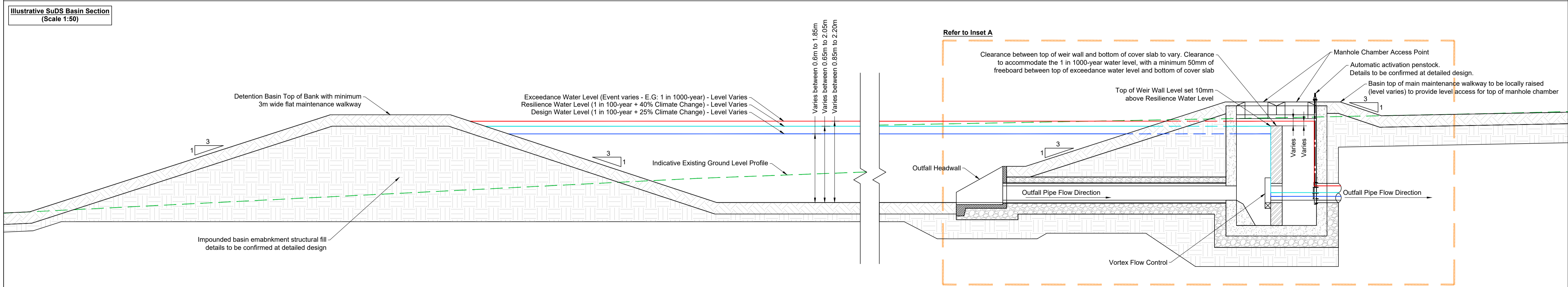
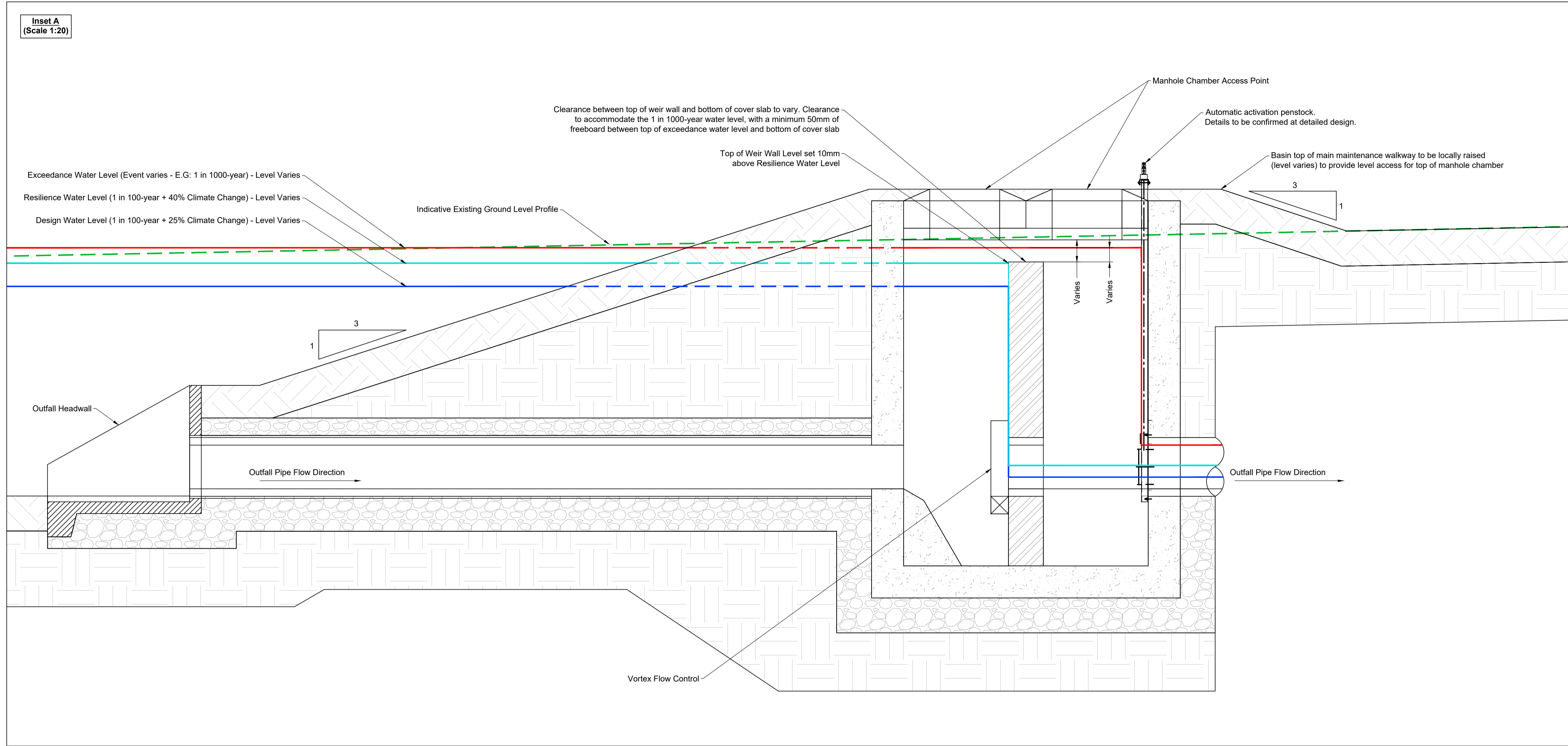
ANNEX 19G

Appendix A – Response to Q19.0.17

Area (Link)	2019 EMFM 2028 Stage 1a LRN Flows (Two-way)		2019 EMFM 2028 Stage 2a LRN Traffic Increases (Two-way)		% Change	
	AM	PM	AM	PM	AM	PM
Diseworth (Grimes Gate)	88	60	35	26	40%	43%
Castle Donington (High Street)	1024	847	56	21	5%	2%
Kegworth (Derby Road)	1710	1574	78	98	5%	6%
Kegworth (Nottingham Road)	662	559	42	5	6%	1%
Long Whatton (Main Street)	665	514	2	30	0%	6%

Area (Link)	2019 EMFM 2038 Stage 1a LRN Flows (Two-way)		2019 EMFM 2038 Stage 2a LRN Traffic Increases (Two-way)		% Change	
	AM	PM	AM	PM	AM	PM
Diseworth (Grimes Gate)	122	99	19	41	16%	41%
Castle Donington (High Street)	1056	920	139	9	13%	1%
Kegworth (Derby Road)	1970	1889	31	9	2%	0%
Kegworth (Nottingham Road)	1064	1219	6	38	1%	3%
Long Whatton (Main Street)	854	877	-51	56	-6%	6%

ANNEX 21A



- Notes**
- Do not scale this drawing. All dimensions must be checked/ verified on site. If in doubt ask.
 - This drawing is to be read in conjunction with all relevant architects, engineers and specialists drawings and specifications.
 - All dimensions in millimetres unless noted otherwise. All levels in metres unless noted otherwise.
 - Any discrepancies noted on site are to be reported to the engineer immediately.
 - This drawing is for information only. Do not construct or cost from this drawing.
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Legend

	Illustrative Existing Ground Level Profile
	Design Water Level
	Resilience Water Level
	Exceedance Water Level
	Inset Frame

ISSUES & REVISIONS

Rev	Date	Details of issue / revision	Drw	Rev
P01	27.03.26	Issued for information	MPB	GSL

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SEGRO

Client

Drawn: M. Bailey | Reviewed: G. Littlewood

BWB Ref: 220500 | Date: 27.03.26 | Scale@A1: As Shown

Project Title

East Midlands Gateway 2

Drawing Status

For Information

Drawing Title

Illustrative SuDS Basin Section

Project - Originator - Zone - Level - Type - Role - Number

EMG2-BWB-WAT-ZZ-XX-DR-CD-0505

Status

S2

Rev

P01