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ASY/ASY/335094/111  
UKM/212912714.1

**By Email Only:** [emgateway2@planninginspectorate.gov.uk](mailto:emgateway2@planninginspectorate.gov.uk)

17 June 2026

Dear Sirs

**LETTER IN RELATION TO SEGRO'S DEADLINE 4 SUBMISSIONS FOR AN APPLICATION BY SEGRO PROPERTIES LIMITED ("SEGRO") FOR A DEVELOPMENT CONSENT ORDER IN RESPECT OF EAST MIDLANDS GATEWAY PHASE 2**

**OUR CLIENT: PROLOGIS UK LIMITED AND PROLOGIS UK 121 LIMITED ("PROLOGIS")**

We write in relation to Action Point 35 which requested that SEGRO's viability expert (Mr Cottage) and Prologis' viability expert (Mr Roberts) prepare an Excel spreadsheet in respect of viability matters ("**Viability Spreadsheet**").

We wish to bring to the Examining Panel's ("**Exp**") attention, and to place on record, that the version of the Viability Spreadsheet submitted on behalf of SEGRO as part of their Deadline 4 Submissions ("**SEGRO Viability Spreadsheet**") was a draft of the Viability Spreadsheet circulated between the parties on a without prejudice basis.

The SEGRO Viability Spreadsheet was not the final, agreed-form document intended for submission. Mr Roberts was still in the process of amending the spreadsheet – a fact that was known to Mr Cottage. Accordingly, the SEGRO Viability Spreadsheet should not have been placed before the Exp.

The definitive version of the Viability Spreadsheet is the version submitted by Prologis at Deadline 4 ("**Prologis Viability Spreadsheet**"). That version is identical to the version circulated by SEGRO so far as the comments of Mr Cottage are concerned, but it incorporates Mr Roberts' finalised and updated comments having taken into account various matters raised by Mr Cottage. It is therefore the Prologis Viability Spreadsheet, and that version alone, which reflects the parties' positions accurately and which the Panel should treat as the document submitted in response to Action Point 35.

In the circumstances, Prologis respectfully requests that the Exp:

1. disregards the SEGRO Viability Spreadsheet, on the basis that it was a draft circulated on a without prejudice basis and is not the final version endorsed by Prologis; and

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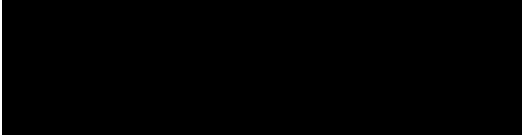
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2. treats the Prologis Viability Spreadsheet as the operative document which accurately records the positions of both Prologis and SEGRO in respect of Action Point 35.

We would be grateful if the ExP would confirm its position on the requests made herein.

This letter has been copied to Gowling WLG acting on behalf of SEGRO.

Yours faithfully



**DLA Piper UK LLP**