

PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

**APPLICATION BY SEGRO PROPERTIES LIMITED FOR THE EAST MIDLANDS GATEWAY PHASE
2 AND HIGHWAY ORDER 202X**

Deadline 5 Submission

ON BEHALF OF

EAST MIDLANDS INTERNATIONAL AIRPORT LIMITED

EAST MIDLANDS AIRPORT PROPERTY INVESTMENTS (INDUSTRIAL) LIMITED

Interested Party References: [REDACTED]

1. INTRODUCTION

1.1 This is East Midlands International Airport Limited's ("**EMA**") ("**the Airport**", as appropriate) and East Midlands Airport Property Investment (Industrial) Limited's ("**EMIAL**") Deadline 5 submission provided in respect of SEGRO Properties Limited's ("**SEGRO**") application for a Development Consent Order ("**DCO**") for the East Midlands Gateway Phase 2 ("**EMG2**") ("**the DCO Application**").

1.2 Terms used in this submission have the same definition as set out in EMA and EMIAL's Written Representation dated 7 April 2026 unless otherwise defined.

1.3 In view of the brevity of the substance of this document, a summary has not been provided.

2. ALIGNMENT WITH PROLOGIS

2.1 EMA and EMIAL continue to support the case being made to the Examination by Prologis UK Limited and Prologis UK 121 Limited (together, "**Prologis**") in relation to land north of Hyams Lane which is the subject of the Joint Application.

2.2 EMA and EMIAL:

2.2.1 have had sight of the documents to be submitted by Prologis at Deadline 5;

2.2.2 agree with and endorse the contents of those documents; and

2.2.3 reserve the right to speak to and expand upon the matters raised in them in further written submissions or during hearings.

2.3 In light of the fact that EMA and EMIAL's position is on all fours with Prologis, EMA and EMIAL do not propose to repeat points made by Prologis. Rather, as set out above, EMA and EMIAL endorse and adopt those submissions.

2.4 In relation to the section of Prologis' Deadline 5 submission on the Compelling case test, EMA and EMIAL wish to emphasise the point that their own arguments advanced jointly with Prologis have been equally mischaracterised by SEGRO.

3. MATTERS ADDRESSED

3.1 This document contains EMA and EMIAL's:

3.1.1 Commentary on matters of viability;

3.1.2 Response to SEGRO's Deadline 4 submissions on traffic and transport; and

3.1.3 Update on safeguarding matters.

4. VIABILITY

4.1 In relation to the report of Mr Peter Roberts submitted at Deadline 5, EMA and EMIAL would draw to the ExP's attention paragraph 7.1 where Mr Roberts notes that "Mr Cottage does not invite the ExP or Secretary of State to conclude that the Prologis scheme is unviable". This is a reference to paragraph 24 of Annexure L to **DCO 7.13 (REP4-033)** where Mr Cottage (the Applicant's expert on this issue) says: "it is simply not possible for me, or indeed anyone else, to reach an opinion on whether the Prologis Scheme is viable or not".

4.2 That acknowledgement by Mr Cottage is inconsistent with the submissions made by Alexander Booth KC for the Applicant at ISH3, as recorded in **DCO 7.14 (REP4-034)**. For

example, on page 50 of that document at paragraph 12, he says: "... the Applicant's understanding is that the Joint Application is not viable." That position by the Applicant cannot be sustained in light of Mr Cottage's statement above.

5. TRAFFIC & TRANSPORT

5.1 Appendix 1 of this document contains a technical note from SCP, who have analysed the range of information on traffic and transport submitted by SEGRO across the suite of documents they submitted at Deadline 4.

5.2 The ExP will be able to see from SCP's technical note that a small number of matters have now been resolved on this topic. However, SCP make it clear that there is still a significant amount of information outstanding from SEGRO, not least in relation to potential highway impacts on the operation of the Airport. That is totally unacceptable for this advanced stage of examination. SEGRO's omissions in this respect only add weight to our previous submissions on procedural fairness in this regard. We would therefore repeat the requests made in ISH3 (noted in paragraphs 12 and 13 of our post hearing submission **REP4-066**) that:

- (a) The ExP make this missing information the subject of one or more of its third round of written questions; and
- (b) The ExP holds an issue specific hearing into traffic and transport matters impacting the Airport in August.

5.3 SCP highlight the statement provided by the Applicant on page 185 of document (**DCO 7.13 REP4-033**) that "The highway mitigation proposed in the Transport Assessment accompanying the DCO Application has been designed to accommodate EMG2 only." On the face of it this statement provides welcome clarity, but in fact perpetuates contradictions in the Applicant's case. Whilst it may have been the Applicant's intention to mitigate solely for EMG2, the failure to explore options for the link road as explained SCP's note means that there is no certainty whether that is indeed the case or whether the Applicant is unjustifiably overproviding.

5.4 If the Applicant is to maintain its position as quoted above, then it now needs to update its Statement of Reasons (**DCO 4.1**) to reduce the weight attached to the benefits of the Highway Works in that document, insofar as those claimed benefits were characterised as enabling "major economic, housing and energy development across the region". SEGRO's Planning Statement (**DCO 5.4**) should be updated similarly.

6. OPERATIONAL MATTERS

6.1 EMA is continuing discussions with SEGRO in relation to operational matters including aerodrome safeguarding, protective provisions and the Active Travel Link, to the east of the runway.

6.2 In relation to SEGRO's proposed Active Travel Link (Work No 14), and without prejudice to EMA's position that there is no need for the Active Travel Link, discussions have progressed constructively and a revised alignment agreed.

6.3 In relation to protective provisions, EMA continues to engage with the Applicant to seek a resolution of this matter to provide for the safe operation of aircraft, at and in the vicinity of the Airport.

6.4 The current position on these, along with the outstanding matters, is set out in the draft operational SOCG between EMA and SEGRO, which we understand SEGRO will submit at Deadline 5.

APPENDIX 1
SCP TECHNICAL NOTE

Technical Note 06

East Midlands Airport - EMG2 DCO

Highways and Transport Review - Executive Summary

Our reference: SC/SP/251399/TN06 – Rev3

Author: ██████████

Date: 30/06/2026

Reviewer: ██████████

Date: 30/06/2026

1.0 INTRODUCTION

1.1. This document sets out a response to the information provided by SEGRO (“the Applicants”) as part of Deadline 4 (16th June 2026). The documents that were reviewed were:

- DCO 7.13 - Applicants' Response to Deadline 2 and 3 Submissions and the attached annexes below:
 - Annex A: Drawing showing controlled crossing option for Works No. 15 alongside the uncontrolled crossing / Capacity analysis of A453 EMA junction including for a controlled crossing
 - Annex B: Correspondence on confirming the view of the RSA Team on Works 15
 - Annex C: Supplemental Note on Departures from Standard
 - Annex D: EMA Consultation Response to the Joint Application and the Planning application for the Isley Woodhouse Development
 - Annex E: Applicants' Response to Appendix 3 of East Midlands Airport Deadline 3 Submission
 - "Annex F: Drawing showing Active Travel Link Interface with EMA at End of Runway / Plan showing revised Active Travel Link Plot 2-6 CPO Requirements"
 - Annex G: Extract from Joint Application Transport Assessment (Appendix B)
 - Annex H: Revised technical plans showing highway geometry and visibility for the ATL
 - Annex I: GG 119 “Road Safety Audit” Appendix B
 - Annex J: Letter from National Highways on the Joint Application
 - Annex K: Development of M1 Junction 24 Improvements
- ISH3
- Appendix 11: M1 J23A & J24 Improvements Packages 1 to 4, Revision P19, dated November 2025
- Appendix 12: National Highways Joint Application (ref: 24/00727/OUTM) holding objection dated 10 June 2026"
- Highways Draft SoCG with LCC
- Draft SoCG with National Highways
- Works Plans Sheet 1
- Works Plans Sheet 2
- Access and Rights of Way Plans Sheet 1
- Access and Rights of Way Plans Sheet 2

- Highway Plans General Arrangement Sheet 1
- Highway Plans General Arrangement Sheet 2
- Highway Plans Cross Sections Sheet 2
- Highway Plans Long Sections Sheet 3
- Appendix 3A of the ES - CEMP (Clean and Tracked)

2.0 POSITION SUMMARY

2.1. The following section provides an overview of EMA's position relative to the information provided by the Applicant to date. Table 1 adapts the table submitted by SEGRO at D4 (REP4-033 Annex E) and adds our response along with a RAG rating to reflect where the agreement/ disagreement remains.

Mitigation Optioneering

- 2.2. One of EMA's concerns has been the potential for increased queue lengths and delays as a result of the EMG2 development, particularly at M1 Junction 24 and the A453/East Midlands Airport Roundabout, which appear to affect the operation of other junctions and the M1 mainline. Confirmation has been provided by the Applicant that the queues are attributed to the traffic generated from other unrelated development allocated in the local plan, rather than the EMG2 development itself.
- 2.3. A key issue for EMA identified throughout the documents is the lack of optioneering to determine the scheme presented for M1 J24. There is no clear evidence that alternative or less extensive mitigation schemes have been considered, making it difficult to determine whether the proposed solution is proportionate or potentially excessive to mitigate the impacts of the EMG2 scheme..
- 2.4. DCO 7.13 Annex K sets out the process that the scheme went through. It states that that modelling has been undertaken to assess a number of schemes. However, no evidence is presented to substantiate that statement. This evidence should be available for review. .

Local Junction Modelling

- 2.5. The A453/Beverley Road roundabout (the main site access) is stated to operate within capacity on completion of EMG2 but this claim lacks supporting evidence. The VISSIM model output provides results for all the junctions within the model with the exception of this junction. Whilst it may be concluded that the whole network will operate to an acceptable level on completion of EMG2 it is not understood if this junction, in its own right, will operate satisfactorily. It is a striking omission for the main site access.
- 2.6. The Applicant's approach to the A453/The Green junction continues to be a concern for EMA, due to its importance for accessing the airport, as no mitigation has been proposed and the applicant states that no mitigation will be provided at the request of the Diseworth residents. The models quite clearly show delays at this junction which could lead to traffic diversions through nearby villages (including Diseworth) and create potential safety issues. Drivers may also become frustrated with the delays at the junction and accept unsuitable gaps in traffic which could lead to safety issues on the A453.
- 2.7. The Applicant states (at (DCO 7.13 (REP4-033) - Page 178/9) "*Mitigation has purposefully not been proposed at the A453/The Green junction so as not to encourage traffic to route via Diseworth. The Airport should be encouraging its staff and visitors to travel via the SRN*". Staff from the airport are

already on the road network (and future growth considered committed development) and the forecast problems at this junction are as a result of the traffic increases arising from EMG2. Therefore, the applicant should be dealing with the issue and not asking/ asserting that local businesses to divert their traffic (especially for local resident employees). Such an approach is unacceptable.

- 2.8. The above point is reinforced by the Applicant's own acknowledgement, in response to ISH1 Action Point 7 (DCO 7.13 – Page 154), that the highway works it proposes – and in particular the new free-flow link from the M1 northbound to the A50 westbound – would be required to allow for growth within the area and to mitigate the impact of forthcoming developments "*whether that included EMG2 or not*".
- 2.9. Yet further conflicting statements persist from the Applicant and a lack of clarity continues on the issue of the approach to mitigation. For example, the response provided by the Applicant in document DCO 7.13 on page 185 states that "*The highway mitigation proposed in the Transport Assessment accompanying the DCO Application has been designed to accommodate EMG2 only.*" The Applicant's overall approach to mitigation is contradictory and does not clearly show that it is policy compliant at this time.

Mezzanine Floorspace Modelling

- 2.10. This remains a concern. LCC has requested additional modelling to be undertaken to assess the additional mezzanine floorspace identified in the application. The results of this modelling are still awaited. National Highways is generally satisfied that the modelling demonstrates acceptable impacts on the strategic road network, and that the mezzanine can be addressed via Requirement 27.
- 2.11. LCC has noted that should the above modelling demonstrated the road network can accommodate the extra traffic associated with the mezzanine floorspace they would be happy to remove requirement 27. National Highways also note that the need for requirement 27 will be reviewed post modelling.

Highway Design

- 2.12. The revised drawings that have been included only provide minor updates with no significant changes compared to the previous revisions.
- 2.13. Design changes have been made to the A453/East Midlands Airport signalised junction to convert the priority pedestrian crossing to a signalised pedestrian crossing, which is reflected on the revised plans. The amended highway design alongside further submissions for the RSA are yet to be agreed by LCC.
- 2.14. All departures from design standards have however, now been approved.

Stakeholder Concerns

- 2.15. The SoCGs with LCC and NH do not appear to be agreed. Highway safety along Derby Road in Kegworth and in Castle Donington is still a concern to LCC due to increase in traffic due to the scheme (otherwise highway safety agreed). LCC also raises a number of other issues that would need considering before agreement can be made. NH have raised concerns regarding the protective provisions.

- 2.16. There are concerns from LCC over how any financial commitments would be secured (as part of the travel plan) in the absence of a S106 however they ultimately agree with the public transport strategy in which the final points around matters of funding and delivery will be agreed.

Construction Environmental Management Plan

- 2.17. With reference to the CEMP (including CTMP and construction programme), there are additional sections related to public communications and traffic management alongside a Construction Worker Travel Plan. These will be developed with further detail once a contractor has been appointed.
- 2.18. The development, implementation, and operation of the CTMP and Temporary Site Access must include EMA as the owner of Beverley Road and one of the principal access routes into the Airport. Any signage or works on the private road will require the agreement of EMA. No vehicles associated with the construction activity will be permitted to queue, wait, or park on any of the private roads within the Airport site.
- 2.19. This should be reflected in the CTMP Enforcement measures set out in Paragraph 8 - In line with the red routing restrictions across the Airport site, including the A453, no vehicles associated with the development, including the construction activity, will be permitted.
- 2.20. The Public Communications and Traffic Management Protocol sets out how SEGRO and the Contractor will manage these impacts and communicate with stakeholders. The inclusion of East Midlands Airport as an interested party will ensure that engagement on the works to the public highway is undertaken. Royal mail has been included as an interested party but this should be extended to 'EMA air cargo operators including Royal Mail, DHL, UPS and FedEx' to manage their logistics effectively during the construction phase.
- 2.21. It should be requested that engagement with Donnington Park for major events should also include EMA, as this can affect access to the airport.
- 2.22. Within the CEMP, a Qualitative Construction Traffic Management Assessment (QCTMA) is referenced throughout, however this is not included within the CEMP or any associated appendices. It is not clear what this document is seeking to do and whether its contents require approval by any of the relevant highway authorities or stakeholders.
- 2.23. In relation to the Construction Worker Travel Plan, this provides a high level overview of access, measures to promote sustainable travel, enforcement and monitoring. To protect local communities and maintain operational resilience at EMG1/EMA, certain routes on the local road network would be prohibited (unless for genuine trips, e.g. employees with an origin at these locations) and compliance will be reinforced through inductions, daily briefings and on-site signage.

Technical Note 06

Table 1

ITEM	CONCERN	EXAMINATION LIBRARY REFERENCES	SCP RESPONSE 04/06/2026	BWB RESPONSE <i>As received</i> 15.06.2026 following meeting dated 12.06.2026	SCP Notes following comments in previous column 15.06.2026	BWB Response Deadline 4	RAG STATUS AND SCP SUMMARY
1	<p>The review of the Transport Assessment and other accompanying documents did not provide a traffic flow model for the base or the base plus development traffic.</p> <p>This makes it difficult to understand the level of traffic that was anticipated at each junction and on each arm of those junctions.</p>	<p>TA Appendix 49 [APP-082] which was unchanged at Deadline 1 [REP1-041] and [REP1-043]</p> <p>TA Appendices 51 to 69 [APP-082] which were mostly unchanged at Deadline 1 except for Appendices 57 [REP-043], 58 [REP-045], 59 [REP-045], 66 [REP-047], 67 [REP-047] and 68 [REP-047]</p>	<p>Appendix 49 is Modelling Furness Approach – this document does not provide a traffic flow diagram as requested but rather background information.</p> <p>TA Appendices 51 to 69 are the various junction modelling outputs from junction 6 to junction 17 – i.e. those junctions that were not modelled in VISSIM.</p> <p>Have traffic flow diagrams been produced as part of the work, or are traffic flows just an integral part of the models?</p>	<p><i>Traffic flows diagrams based on the VISSIM modelling outputs had been produced for the following modelling scenarios:</i></p> <ul style="list-style-type: none"> - 2028/2038 Without development - 2028/2038 With development - 2028/2038 With development + Mitigation <p><i>As noted previously, these are contained in Appendix 50 of the TA [REP1-043] which was submitted as part of Deadline 1. Appendix 2 within VISSIM Forecast Modelling Report (Appendix 50) shows the traffic flows within the VISSIM highway network.</i></p>	<p>Two traffic flow diagram figures (AM and PM) have been produced for just the VISSIM network portion of the assessment which shows the turning counts across all scenarios in 2028 and 2038. No flow diagrams covering the entirety of the network has been provided.</p>	<p>The traffic flows from PRTM 2019 and PRTM 2023 cannot be taken directly and input into the detailed junction modelling. A finessing methodology to derive accurate turning movements was therefore discussed in detail with NH and LCC and agreed in accordance with the details in Appendix 49 of the Transport Assessment. The traffic flows for the detailed VISSIM, LinSig and Junctions 11 models were issued to NH and LCC and agreed with them prior to the modelling taking place.</p> <p>Turning movements for all modelled scenarios can be found in the relevant modelling outputs included at Appendices 51 to 69 of the Transport Assessment.</p>	<p>Traffic Flow Diagrams are available but only for the VISSIM extents of the network. These also only cover certain scenarios. The Traffic Flow Diagrams need to show the full network in the vicinity of the site and traffic flows for all scenarios.</p>

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2	There is no explanation of significant differences between the 2019 and 2023 modelling, particularly on the M1 SB and off slip and A50 approach.	TA Appendices 6 and 7 [APP-082] which were unchanged at Deadline 1 [REP-031]	Appendix 6 and appendix 7 - EMFM Base Year Model Review and EMFM Base Year Model Review Addendum – don't actually outline the request but rather assess the models singularly without any cross reference to the 2019 and 2023 model. Is there a document or text that provides a direct comparison of the two models to understand the differences?	<i>The differences between the 2019 and 2023 modelling results are attributable to updates made to the base model flows. The 2023 PRTM model was recalibrated using observed traffic counts from 2023 and, consequently, the variations between the 2019 and 2023 base flows have been reflected within the respective forecast assessment scenarios.</i> <i>The differences in forecast flows are presented in Appendix 10 of EMG2-BWB-GEN-XX-RP-TR-0022_PRTM 2023 Sensitivity Test [REP1-058]</i>	There is no direct text which summaries the difference between 2019 and 2023 however Appendix 10 provides multiple tables outlining the difference in flows between models. This will be reviewed to understand traffic flow differences.	Both PRTM 2019 and PRTM 2023 models have been scrutinised by National Highways, Leicestershire County Council (LCC) and the Applicant. LCC's Network Data Intelligence (NDI) team produced Base Model Validation Reports confirming that both the PRTM 2019 and PRTM 2023 base models validate to an acceptable level with key strategic road network link flows meeting TAG criteria. There is less traffic on the M1 SB and A50 approach to M1 Junction 24 in PRTM 2023 which is the reason there are differences in the modelling results for these arms. Whilst PRTM 2023 is the more recent version of the model, the mitigation is based on PRTM 2019 which has higher traffic flows overall and presents a worst-case assessment.	Whilst BWB do not directly answer the question, LCC and NH have agreed the validation report and as the 2019 model is more robust than the 2023 model, this item can be agreed.
3	Junction 6 – M1 Junction 24 Mitigation has been provided on the approaches, the circulatory carriageway and on the approach to the junction. Due to a lack of data it is not clear if the scale of improvements on the M1 northbound off slip are proportionate to the development.	TA Appendix 50 [APP-082] which was updated at Deadline 1 [REP-043]	We have been pointed to Appendix 50 - VISSIM Forecast Modelling Report (which was used to form the basis of the impact of the development) but does not make reference to traffic flows, rather the impact on journey times, queue length and other such parameters.	<i>Traffic flows diagrams based on the VISSIM modelling outputs had been produced for the following modelling scenarios:</i> - 2028/2038 Without development - 2028/2038 With development - 2028/2038 With development + Mitigation	No document has been prepared which shows design optioneering but the previous designs associated with the junction have been used as basis to form the proposed mitigation.	The Transport Assessment provides comprehensive modelling outputs of M1 Junction 24 within the following sections: • Section 10 – Stage 1A modelling • Section 11 – Stage 1B modelling • Section 13 – Stage 2A modelling • Section 14 – Stage 2B modelling The Transport Assessment main report provides network performance results comparing the change in delays, vehicle	No document has been prepared which evidences the design optioneering undertaken. (The submission of design optioneering is typical in applications of this nature and it is not clear why this

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			<p>Has there been a document prepared which outlines the design optioneering and how the submitted design was arrived at?</p>	<p><i>As noted previously, these are contained in Appendix 50 of the TA [REP1-043] which was submitted as part of Deadline 1. Appendix 2 within VISSIM Forecast Modelling Report (Appendix 50) shows the traffic flows within the VISSIM highway network.</i></p>		<p>speeds, vehicle arrivals and latent demand across the entire VISSIM network between the without development and with development scenarios, inclusive of the proposed mitigation. Appendix 50 of the Transport Assessment contains the VISSIM forecasting report, which provides more detailed modelling results comparing queue lengths and journeys times along individual arms. Overall, there has been sufficient information presented in the Transport Assessment and accompanying appendices to undertake a thorough review of the VISSIM modelling.</p>	<p>information is missing).</p>
4	<p>Junction 3 - Finger Farm Roundabout</p> <p>Minor mitigation is proposed due to traffic diverting to the M1 J24. However, no data is provided detailing the amount of traffic to be diverted.</p>	<p>TA Appendix 70 [APP-082] which was unchanged at Deadline 1 [REP-049]</p> <p>TA Appendix 50 [APP-082] which was updated at Deadline 1 [REP-043]</p>	<p>TA appendix 70 sets out the EMFM Stage 2A Modelling Forecasting Report Addendum, Figure 3.1 (Page 19) onwards provides heat map style diagrams setting out different traffic levels however these are not specific and don't provide information on the diverted traffic.</p> <p>Appendix 50 - VISSIM Forecast Modelling Report (which was used to form the basis of the impact of the development) does not make reference to traffic flows but rather the impact on journey</p>	<p><i>Traffic flows diagrams based on the VISSIM modelling outputs had been produced for the following modelling scenarios:</i></p> <ul style="list-style-type: none"> - 2028/2038 Without development - 2028/2038 With development - 2028/2038 With development + Mitigation <p><i>As noted previously, these are contained in Appendix 50 of the TA [REP1-043] which was submitted as part of Deadline 1. Appendix 2 within VISSIM Forecast Modelling Report (Appendix 50) shows the traffic flows within</i></p>	<p>No direct reference can be found within the referenced document from BWB.</p> <p>However having analysed the traffic flow diagram at Finger Farm roundabout there is a difference of 531 PCUS when comparing the 2028 Mitigation (and Development) to the 2028 with development scenario. In 2038 this increases to 631 PCUS.</p>	<p>Appendix 70 of the Transport Assessment contains the PRTM 2019 Forecast Report, which presents the strategic modelling results of the proposed mitigation (Stage 2A). Figure A.1 and A.2 show the forecast flow change between the without development and with development with mitigation scenarios and show that there would be an increase on the new M1 northbound to A50 westbound free flow link and a reduction on the A453.</p> <p>The PRTM outputs were obtained and furnished to derive suitable traffic flows for the VISSIM modelling.</p> <p>This shows that 610 vehicles in the morning peak hour and 210 vehicles in the evening peak hour would be transferred from the</p>	<p>The information provided by BWB indicates how much traffic is being diverted.</p>

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			times, queue length and other such parameters. Is there a direct reference to the amount of traffic that will be diverted?	<i>the VISSIM highway network.</i> <i>The traffic flow diagrams illustrate the number of vehicles utilising the new link road in the 'With Mitigation' scenarios. Subsequently, the drop in flows towards A50 from A453 NB and M1 NB can be seen on the traffic flow diagram.</i>		A453 to the M1 as a result of the proposed mitigation. The full modelling results are provided in the PRTM Forecasting Report and VISSIM Forecasting Report included at Appendices 50 and 70 of the Transport Assessment.	
5	The information provided on construction mitigation is inadequate. A CTMP has been produced in which it identifies the volume of construction traffic associated with the development of the site itself. The document sets out the mechanism by which traffic has been calculated and how this will be monitored. There is very little information in the documentation with respect to the off-site construction works for the highway mitigation measures. In particular, there is no meaningful programme for construction of those works, and no proposals to mitigate the impacts of	CEMP Appendix 03 Document DCO 6.3A [REP2-026D] which was updated at Deadline 2	To be reviewed in full with respect specifically to the operation of the airport.	<i>The CTMP has been updated and will be resubmitted at D4</i>	This will be reviewed post deadline 4 to establish any changes between the previous iteration.	The CTMP which was updated for Deadline 2 provides details on how the impacts of construction are to be managed. It is important to note that there are significant levels of traffic generated by EMG1 which is a 24/7 operation so the Applicant is very much aware of the general need to minimise the impact on traffic throughout the day and not just at peak times. The CTMP has been revised further at Deadline 4.	A revised CTMP has been produced which at this stage is high level and will be refined when a contractor is appointed.

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	construction during that time.						
6	The WCHAR audit was referenced by the Applicant but has not been made available for review.	TA Appendix 3 [APP-081] which was unchanged at Deadline 1 [REP1-031] TA Appendix 24 [APP-081] which was unchanged at Deadline 1 [REP1-035]	To be reviewed in full with respect to the operation of the airport.	<i>Noted</i>	Document will be reviewed	The WCHAR assessment and review reports are found at TA Appendices 3 and 24 respectively. These were submitted with the original application and have not changed in the information submitted at Deadline 1	This has been reviewed and no comments raised.
7	The TA modelling was not provided to the audit team and as such the mitigation cannot be reviewed against the modelling outputs.	Audit Brief approval confirmed at Deadline 1 [REP1-056]	The response refers to Road Safety Audit 1 in which (in section 1.2) the Audit Brief prepared by the Design Team and the Audit Team were approved by Jeremy Bloom of National Highways and Adrian Whiteman of Leicestershire County Council. Has this audit brief been included within the appendices? If not, can this be provided?	<i>We will follow up with the Client team post our discussion</i>	BWB confirmed this document has been prepared previously, however SCP are unsure why this cannot be provided. SCP will review once this is received.	The Audit Brief (which has been approved by both NH and LCC) contained the relevant and appropriate information on traffic data for use within the Audit.	The audit brief was provided to SCP by Paul Wilson on the 17.06.2026 however it is noted that the traffic modelling results do not appear on the List of documents and drawings provided with this Brief.
8	No information has been provided to show how the highway works were arrived at through an iterative process and specifically whether any less intrusive measures were considered as alternatives.	Joint Position Statement relating to SRN Mitigation [REP1-060D]	We note that the following statement was provided in the Joint Position related to SRN mitigation scheme; <i>The consortium, through engagement with National Highways</i>	<i>M1 Junction 24 is a known 'bottleneck' that is restricting growth around East Midlands Airport. This has been confirmed by the East Midlands Combined County Authority and National Highways who</i>	No document has been prepared which shows design optioneering but the previous designs associated with the junction have been used as a basis to form	The approach is as set out in the Joint Position Statement with National Highways (Document DCO 8.1).	No document has been prepared which shows the design optioneering. (The submission of design optioneering is typical in

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			<p><i>and other key stakeholders, has identified a combination of highway upgrades which the consortium considers together provide a solution to the capacity issues at Junction 24. That solution has been discussed with National Highways. The consortium is undertaking strategic and microsimulation modelling to demonstrate the suitability of the proposed solution to mitigate the impacts of all planned growth in the area. National Highways is engaged in this exercise and will review the modelling and the effectiveness of the mitigation when it is available.</i></p> <p>However, this does not outline the design optioneering and how the submitted design was arrived at? – similar concern to item 3.</p>	<p><i>have identified it as a key junction that requires significant improvements, rather than more minor piecemeal mitigation, hence the approach adopted.</i></p>	<p>the proposed mitigation.</p>		<p>applications of this nature and it is not clear why this information is missing).</p>

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9	<p>Eleven departures from standards have been agreed; with two further exceptions still to be agreed. However, only six were identified in the RSA. Confirmation is needed whether the RSA will be repeated with the correct number of departures considered.</p>	<p>Stage 1 RSA provided at Deadline 1 [REP1-056] TA Appendix 26 updated at Deadline 1 [REP1-035] TA Appendix 27 updated at Deadline 1 [REP1-035] & [REP1-037]</p>	<p>The REP1-056 still only makes reference to 6 departures in section 1.7. Will there be a revised RSA which takes into account all the departures from standards?</p>	<p><i>We would respectfully ask that you read paragraph 1.7 of the Stage 1 RSA again and compare to the list of departures at the end of TA Appendix 27 (as issued at Deadline 1)</i></p>	<p>The information as provided by BWB collated several departures from standards in the same paragraph as such it was difficult to ascertain the number of departures. This has been checked and no further comment.</p>	<p>Para 1.7 of the Stage 1 Road Safety Audit contains a bullet point list related to departures from standard. However, each bullet refers to a location and, for example the first bullet refers to the five geometric departures on the M1 northbound from J23A to J24. When the geometric departures referred to in the first four bullets are added up (these being on the SRN) these total 11, the same 11 that are now approved by National Highways. At the time of the Audit two departures were considered to be needed on the LRN, these have since been designed out as confirmed in the updated TA Appendix 26.</p>	<p>Agreed</p>

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10	The RSA identified a lack of information regarding the bridge associated with the M1 A50 link road. Confirmation is needed whether the RSA will be repeated with more complete information on bridge design.	Stage 1 RSA provided at Deadline 1 [REP1-056] Highway Plans GA Sheet 3 Document DCO 2.8C [AS-011D] Highway Plans Longsection Document DCO 2.10A [APP-049D] A453 Bridge Plan Document DCO 2.11 [APP-053D]	In section 1.8 it is noted by BWB 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. Will this be included in a revised Road Safety Audit?	We will respond to this in full at Deadline 4	Noted – to be provided at deadline 4.	The requirements of DMRB standard GG 119 are important when undertaking a Road Safety Audit, and Appendix B provides a checklist of matters to be considered at each Audit stage. An extract of GG 119 is found at Annex I. In relation to bridges, at Stage 1 the important consideration is the impact bridges may have on the highway design such as visibility. Such information is clearly shown on the highway drawings reviewed at the Stage 1 Audit. GG 119 appendix B then goes on to say that more detailed information on bridges such as parapets are a matter for the stage 2 audit which will be undertaken at the end of the detailed design stage. Therefore the Audit, which has been approved by National Highways, is complete and is not invalid	A Stage 1 Audit does not require the bridge design to be audited. The drawings presented to the auditors did show the bridge abutments and long sections
11	Junction 2 - A453/Beverley Road Roundabout No modelling results are included for this junction so EMA is unable to satisfy itself about the future operation of the junction.	TA Appendix 46 [APP-082] which was updated at Deadline 1 [REP-041]	Appendix 46 is VISSIM Local Model Validation Report which sets out the results of the travel time however this doesn't actually show results of the junction modelling. Table 3 of Appendix 50 - VISSIM Forecast Modelling Report shows the Stage 1A 2028 MMQ which shows the result of the	<i>Queue results are not readily available for the A453/Beverley Road Roundabout because they are embedded in the VISSIM model results.</i> <i>Within the VISSIM model there are no queue counters at the site access, the main focus was at the key</i>	Given that all the other junctions (included within the VISSIM extent) were included in the outputs. The response from BWB indicates that the results are available however this just requires more analysis of the VISSIM outputs in order to show the results. SCP would	We presume this should refer to the A453. The A453/Beverley Road junction has been modelled in VISSIM with full modelling results included within the VISSIM Forecasting Report at Appendix 46. The journey time results for Route 16 are relevant to the A453/Beverley Road junction and show a reduction in Stage 2A compared to Stage 1A, highlighting that there would be an	No junction modelling results specifically for this junction have been provided.

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			<p>VISSIM modelling for the modelled network but the table doesn't show the results for the A463/Beverley Road Roundabout.</p> <p>Are there traffic modelling results available for this junction?</p>	<p><i>SRN junctions as these are the junctions that were congested in the forecast base scenarios. However, journey times along the A453, which are included within the report, which shows the eastbound/westbound journey times across the Beverley Road Roundabout. confirms that there are no increases along this route between the WoD and WD scenarios, and the journey times decrease along the A453 in the mitigation scenario, as the new A50 link road increases capacity at the Finger Farm Roundabout.</i></p> <p><i>The VISSIM model also shows that there is also no latent demand on the site access arm.</i></p>	<p>still query why this hasn't been shown?</p>	<p>overall betterment to the operation of the junction. The latent demand also improves, showing that more traffic is able to enter the VISSIM network in Stage 2A compared to Stage 1A.</p> <p>The VISSIM model has been issued to NH and LCC who have agreed that the A453/Beverley Road junction will continue to operate sufficiently in capacity and not negatively impacted by the EMG2 development.</p>	

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12	The TA does not appear to have included traffic associated with future growth of the Airport.	TA Appendix 8 [APP-082] which was unchanged at Deadline 1 [REP-031]	<p>Appendix 8 - PRTM Proforma v14 & Uncertainty Log v7- this sets out the sites that have been included in the assessment as well as the mitigation schemes that are likely to come forward in the proceeding years.</p> <p>As noted in page 600 of Transport Assessment Part 2 of 4 – EMA Aviation expansion has been included as part of the employment data however there is no reference to increased patronage of the airport in terms of physical passengers at the airport or possible cargo growth.</p> <p>Is projected future passenger growth included within any future assessments?</p>	<p><i>The growth of the Airport within the modelling is exactly the same as that used by EMA and Prologis for the Joint Application, as provided by NWLDC; 938 additional jobs is included for within the TA for both EMG2 (Appendix 8) [REP1-031] and the Joint Application (Appendix B).</i></p>	<p>BWB confirm that employment growth has been included but long-term passenger and freight growth has not been included. This is the same approach used in the joint application.</p>	<p>The planning data assumptions for the transport modelling are logged in Uncertainty Log v7, which was included at Appendix 8 of the Transport Assessment.</p> <p>This includes an additional 938 jobs at East Midlands Airport to account for future growth and development, as set out by NWLDC as local planning authority.</p>	<p>The same approach has been adopted for each application.</p>
13	EMA need to understand any potential impacts to the current layout and operation of the landing lights from the Proposed Development. At present, EMA does not have sufficient information from the Applicant to satisfy itself in that respect.					<p>The Applicant is very aware of the importance of the issues raised regarding the landing lights and airfield security fence, and working in this area generally, having delivered the EMG1 scheme which required far more substantial works than that proposed for EMG2.</p>	<p>This is still to be agreed with further documents to be provided by the Applicant at Deadline 5</p>

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						<p>As such when determining the route of the active travel link these matters were given full consideration, and the simplest and least disruptive solution was for the alignment of the active travel route to follow the route of a former road alignment which is still present on the ground.</p> <p>At the northern end of this redundant piece of road, as part of the EMG1 scheme the earthworks were formed to allow future provision of the active travel link. At the time of EMG1 it was known there were wider ambitions from stakeholders for this route to be provided. It was not constructed beyond earthworks as it would have led to nowhere. However, this again means the works to form the active travel link on this section will be relatively straightforward.</p> <p>Upon receiving the questions raised by EMA at Deadline 3 the Applicant has produced a detailed plan showing the precise alignment of the active travel link and how it interfaces with the landing lights and confirms sufficient set back from the airfield security fence. This has been shared with EMA and we understand EMA have now confirmed that the route does not affect their assets. This plan is found at Annex F.</p> <p>The horizontal deviation is limited by the works area and we have reduced the area of Works 14</p>	

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						<p>(specifically 14a) by removing the sliver of EMA land plot 2/6 that is between the airfield security fence and A453 boundary from the scheme. An updated version of the Works Plan (Document DCO 2.3B) is therefore provided. Note that this amendment also deals with the realignment of the active travel link to avoid the corner of the car park. Updated land plans and associated documents will be submitted at Deadline 5.</p> <p>In terms of the vertical limits of deviation the Applicant proposes to amend these for Works 14a to +/-0.2m, which would match those for Hyams Lane, in the revised DCO to be submitted at Deadline 5. The applicant is confident such a restriction on vertical limits of deviation can be complied with given the route is following a combination of the former carriageway and already constructed earthworks.</p>	