

Deadline 6 Submission by National Highways Limited

NH Response to Written Questions and Actions

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

Planning Inspectorate Reference Number: BC0410001 /TR0510002

1. INTRODUCTION

- 1.1 This document is submitted by National Highways ("NH") for Deadline 6 in respect of application by **Segro Properties Ltd ("Applicant")** for an order granting development consent for **the East Midlands Gateway 2** project ("DCO") and **East Midlands Gateway Rail Freight Interchange ("MCO")**. The Applicant seeks development consent for proposed authorised developments described in Schedule 1 of the draft DCO ("**Authorised Development**").
- 1.2 This document sets out National Highways response to the Examining Authority's third written questions.

2. RESPONSE TO THIRD WRITTEN QUESTIONS

Question Number	Question to:	Question:	NH Response
2. Design, parameters and other details of the proposed development			
Q2.0.1	The applicants NH LCC	Mezzanines/ internal floorspace Note: Please also see the relevant ExP's proposed change to these requirements. The ExP notes the response to AP 66 in the applicants' 'Applicants' Response to Deadline 4 Submissions' [REP5-033] in relation to NWLDC that "following further engagement with [NH], is it anticipated that the requirement may not be required." (a) Should this be the situation, then the applicants', NH and LCC should set out clearly and fully why this would be the case. (b) In any event, should the ExP's proposed change to this requirement be imposed to ensure that no additional internal floorspace is provided, as the provision of internal floorspace would not represent 'development' and without this, it is	The Applicant's transport modelling did not account for the full quantum of development proposed as the proposed Mezzanine Floor was added to the scope of the proposed development subsequent to the original modelling exercise. As a result, the additional 100,000 sqm of internal floorspace was not included within the assessment of impacts on the SRN. NH raised concerns during the Pre-Application Stage that the resulting untested trip demand could give rise to impacts on the SRN that had not been adequately assessed. However, the Applicant explained that the Mezzanine Floor would only be used for storage and racking in line with modern efficient warehousing operations and would not result in additional trips on the highway network. Requirement 27 was pursued by NH as an alternative to further modelling to ensure that the additional internal floorspace aligned with the trip characteristics in relation to storage and racking that the Applicant advised (lower generation than is associated with the ground floor equivalent). Requirement 27 was considered by NH to be a substitute for the Applicant undertaking traffic modelling as it sought

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		possible that the effects which have not been assessed could occur?	to limit additional trip generation from the site arising from different activities that could be deployed on the site in the future with higher trip generation characteristics. The Applicant has now undertaken a supplementary VISSIM (microsimulation) assessment (June 2026) taking into account the additional 100,000sqm of internal floor applying the agreed trip rates from the ground floor. The traffic model and associated outputs have been provided to NH (June 2026) and NH can confirm that when the full quantum of development is assessed and with the mitigation in place (i.e. a worst case), there is a reduction in queuing on the M1 northbound approach between J23a and J24, addressing development-related impacts and safety concerns. Based on the traffic modelling assessment undertaken, NH no longer requires Requirement 27 to be included in the DCO Whilst from NH's perspective Requirement 27 is no longer required, should it be implemented, NH is content with the proposed revised wording. However, NH were initially confused by the use of the term 'internal floor space' as NH interpreted this to include the entire ground floor space (ground and first floor). Therefore, NH suggests that the term 'internal floor space' should be preceded by 'first floor'.
19. Traffic and Transport			
Q19.0.1	The applicants NH LCC	Co-located office functions The applicants are asked to explain demonstrate how a “co-located office function”, which could be, within an eventual individual planning unit (please refer back to earlier discussion on “substantial completion”) part of a mixed use also incorporating storage and distribution uses or advanced manufacturing uses or a combination of all three, has been	NH is satisfied that an appropriate level of ancillary office floorspace associated with storage and distribution (use Class B8) and manufacturing/ advanced manufacturing (use Class B2) has been accounted for within the trip generation assessment. The trip rates applied in the assessment were derived from the TRICS database using observed data from sites considered comparable to EMG2. As the surveyed sites would typically include ancillary office accommodation associated with their primary land use, the resulting

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		considered in relation to the traffic generation assessment of the proposed development. NH and LCC are also requested to comment on this.	trip rates are considered to inherently reflect this component of development. NH has agreed the trip rates for assessment and is content that the trip generation associated with ancillary office uses has been adequately captured within the assessment.
Q19.0.2	The applicants NH LCC NWLDC	Advanced manufacturing It its proposed changes to the DCO the ExP as set out that 20% of the total gross floorspace provided as part of the authorised development shall be for advanced manufacturing use. Should, for example, it be possible to let more than 20% of the gross floorspace as advanced manufacturing the ExP is also concerned to ensure that the total of advanced manufacturing does not result in additional effects that have not been assessed. The applicants, NH, LCC and NWLDC are asked to consider mechanism(s) to ensure that no additional effects not assessed occur.	NH notes the ExP's concern regarding the potential for a greater proportion of the authorised floorspace to be occupied by advanced manufacturing uses than has been assessed. The assessment underpinning the Application was based on a defined land use mix and associated trip generation assumptions, including provision of 20% advanced manufacturing floorspace. As set out in NH's response to Q19.0.1 the trip generation assessment has been agreed. Furthermore, it is understood from the Applicant that there will be an updated parameter plan that will be submitted into the DCO which will limit the advanced manufacturing to 20%. This acts as a control measure under the DCO. Within the Framework Travel Plan (FTP) [REP4-022] paragraphs 8.9 and 8.10 explain that vehicle traffic counts will monitor the number of vehicles entering/leaving the site every September and states that ' <i>if the number of vehicle trips generated to / from the site exceeds those assessed in the EMG2 Transport Assessment in the AM and PM peak, additional 7-day traffic counts will be carried out every April during the travel plan delivery period. The purpose of these additional counts will be to more regularly monitor the number of employee vehicles arriving / leaving the site to determine any wider impact on the strategic road network. These additional counts were a response to a request from National Highways regarding concerns for the strategic road network.</i> ' The FTP states that, where trip rate targets are exceeded, a series of 'fall-back measures' (as set out in paragraphs 8.12 – 8.18 of the FTP [REP4-022]) will be put into place.

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			Accordingly, NH is satisfied that, through both the DCO controls and the monitoring and mitigation measures secured through the Framework Travel Plan [REP4-022], there are sufficient mechanisms to identify and address any exceedance of the assessed trip generation if, for any reason, advanced manufacturing exceeds the 20% total gross provided as part of the development.

National Highways Limited
28 July 2026