

East Midlands Gateway Phase 2 – East Midlands Gateway Rail Freight Interchange Material Change - LCC responses to Examining Panel (ExP) first questions – Deadline 1 - 7th April 2026

ExP reference	Question	Response
Q1.0.1	<p>Planning and Infrastructure Act 2025</p> <p>The Planning and Infrastructure Act received Royal Assent on Thursday 18 December 2025. All IPs, including the applicants, are invited to submit comments on the new Act in relation to any implications for the examination of this application.</p>	LCC has no comments to make.
Q1.1.1	<p>Development plan</p> <p>Could the identified interested parties please provide copies of the development plan for which they are responsible along with any associated policy maps. Where a development plan is under review, could the identified interested party, also provide information as to the stage of review that the plan has reached, along with a timetable through to adoption/ making. This should be updated throughout the examination should it change. Where a draft development plan document exists, please could a copy also be provided (along with any associated maps). Again, this should be updated throughout the examination.</p>	LCC provided a copy of the Leicestershire Minerals and Waste Local Plan adopted in 2019 to the ExP via email on 26.03.2026. The Planning Inspectorate Case Officer kindly confirmed receipt on 27.03.2026.
Q1.2.8	<p>20% advanced manufacturing floorspace</p> <p>Paragraph 3.2.7 of chapter 3 of the ES [AS-025] states that the development would primarily comprise logistics buildings with up to 20% of the floorspace capable of being used for ‘advanced manufacturing’. Please can the applicants clarify how this 20% limitation is secured in the dDCO and explain the environmental effects in the event this 20% limitation is exceeded. For example, why is the limitation important, does advanced manufacturing generate different environmental effects in relation to traffic, noise and disturbance compared to storage and distribution?</p>	LCC invite the Applicant to confirm that the trip rates applied, which are based on those adopted for EMG1, allow for 20% advanced manufacturing floorspace.
Q2.0.8	<p>Parking space size</p> <p>Paragraph 6.31 of the TA [APP-080] sets out parking sizes. The ExP is aware that many local planning authorities are seeking larger spaces (generally to the width) to accommodate the larger cars that are being produced compared to those when the standards were originally drawn up. Does the applicant, NWLDC or LCC have any comment as to whether larger spaces should be included within the parking areas?</p>	<p>LCC would seek parking space dimensions in line with the Leicestershire Highway Design Guide (LHDG) available at:</p> <p>https://www.leicestershirehighwaydesignguide.uk/highway-layouts-and-design/parking-and-making-provision-service-vehicles/design-principles-street-parking#offstreetlayouts.</p> <p>LCC requires car parking spaces to be a minimum of 2.4m by 5.5m, add 0.5m if bounded by a wall, fence, hedge, line of trees or similar obstruction on one side. 1m if bounded on both sides. LCC do not require an increase in the width of spaces under consideration beyond the above requirements. Larger spaces would be acceptable if there was no impact on the quantum of spaces proposed.</p>

Q4.0.3	<p>Reasonable worst case scenario complexity</p> <p>Paragraph 8.2.58 of chapter 8 of the ES [AS-037] establishes four scenarios considered as part of the traffic modelling that underpins the air quality assessment. These modelling scenarios were broken down into sub scenarios in paragraph 8.2.55. What is the rationale for conducting such a multitude of scenarios? Does it present an overly complex approach, and could it be streamlined by adopting one definitive reasonable worst case scenario for each of the following:</p> <ol style="list-style-type: none"> 1) Baseline traffic 2) EMG2 project traffic (with DCO and MCO assessed discretely) 3) EMG2 project traffic (with DCO and MCO assessed discretely) + mitigation 4) EMG2 project traffic (with DCO and MCO assessed discretely) + mitigation + cumulative project traffic 	<p>The additional scenarios and model flows for air quality assessments were not requested by LCC or stakeholders of the Transport Working Group. This was an Applicant led approach based on the Applicant’s interpretation of Environmental Impact Assessment requirements.</p>
Q4.0.11	<p>PRTM updates</p> <p>The ExP acknowledges that the air quality modelling and assessment are reliant on the PRTM and that as per the applicants’ submission [PDA-001], the PRTM assessment is currently in the process of being updated to the 2023 version. Whilst it would be helpful for the applicants and other IPs to answer questions relating to air quality modelling and assessment at this juncture (ExQ1), if more informative answers can only be given after the PRTM assessment has been updated, or answers would otherwise quickly become out of date, then please highlight this to the ExP accordingly.</p>	<p>LCC is primarily interested in the PRTM2023 modelling for the entire quantum of development proposed and awaits the Applicant’s detailed submissions.</p>
Q5.0.30	<p>Potential contamination</p> <p>Paragraph 9.5.65 in chapter 9 of the ES [AS-039] indicates that pollution would be “limited to potential flood events large enough to extend back upstream into the SSSI from the river Soar”. However, the River Soar is downstream of Lockington Marsh SSSI and therefore any pollution from the proposed development would reach Lockington Marsh SSSI before it reaches the River Soar. Could the effects of pollution from the application site on the Lockington Marsh SSSI and River Soar please be confirmed.</p>	<p>LCC defer to the Environment Agency on this matter.</p>
Q8.0.1	<p>Updated DCO at Procedural Deadline A</p> <p>At Procedural Deadline A, the applicant updated the dDCO [PDA-004D] with an explanation for those changes in the Schedule of Changes document [PDA-008]. All IPs are asked to review these changes and the justifications for them and submit any comments that they may have into the examination.</p>	<p>LCC comments on the dDCO have been submitted under separate cover. LCC notes that changes it has requested have not to date been taken on board.</p>
Q8.0.2	<p>Deemed approvals</p>	<p>LCC understand the need for deemed approvals and have no justification to challenge the time periods as set out in the dDCO.</p>

	<p>All bodies which would approve approvals are asked to review the time periods set out and to comment as to whether they consider these periods appropriate. If a different period were to be sought, then the body should justify this revised period. Individual periods should be set out by provision.</p> <p>The ExP understands that the provisions are:</p> <ul style="list-style-type: none"> Articles 9, 11, 13, 17, 19, 20. Schedule 13, part 1, paragraph 2 Schedule 13, part 2, paragraphs 4, 13 <p>However, this should not be considered comprehensive, and parties are requested to consider the whole dDCO.</p>	
Q8.1.2	<p>Article 13 – Accesses</p> <p>The ExP’s reading of this provision would allow new accesses to the SRN. In its RR [RR-022] NH states that it understands that these are not being proposed. However, in its Schedule of Changes to the Draft DCO submitted at Procedural Deadline A [PDA-008D] the applicants indicate that temporary access will be required to facilitate highway works on the SRN.</p> <p>Could NH please further comment on this matter and whether there should be a specific restriction included within the requirement.</p> <p>Could LCC confirm that it is content with this provision for the local road network.</p>	LCC understands that the Applicant is considering whether temporary construction access will be required to the LRN. LCC reserves the right to respond to this matter in detail once this information has been received.
Q8.1.3	<p>Article 19 – Discharge of water</p> <p>Could the EA, LCC as local lead flood authority and STW comment as to whether article 19 should prevent the discharging of surface water into any foul or combined drain or sewer?</p>	LCC is not aware of any proposed surface water discharge to combined systems. The Applicant should confirm this position.
Q8.1.4	<p>Article 38 – Felling or lopping of trees and removal of hedgerows</p> <p>Could the identified parties please comment on the distance from the Order limits of 25 metres set out to allow works to trees and hedgerows. The ExP notes that general advice from NE is that 15m is sufficient buffer to ensure ancient woodland is not affected. Given there is no such resource here, any distance will need to be fully justified both in response to this question and in the EM.</p> <p>Could NWLDC confirm whether presently there are any trees protected by tree preservation orders within 25m of the Order limits? Should this situation change, could NWLDC ensure this information is submitted into the examination.</p> <p>Is any party aware of any hedgerow within 25m of the Order limits which would be defined as “important” for the purposes of The Hedgerows Regulations 1997 or an “important hedgerow” for</p>	LCC consider a 25m distance from the Order limits to allow works to trees and hedgerows to be excessive and unnecessary and the Applicant should reconsider this position. In addition, the Applicant should clearly document trees and hedgerows with the extents of the public highway for which LCC is responsible which could be impacted by this buffer. LCC reserves the right to respond to this matter in detail once this information has been received.

	the purposes of The Management of Hedgerows (England) Regulations 2024? If so, could this please be identified on a plan, along with the reasoning behind why the party holds that view.	
Q8.3.1	<p>Consultee in requirements</p> <p>In various requirements there is a requirement for consultation with a statutory body prior to the decision maker deciding whether to approve details pursuant to requirements. Could all statutory parties review the requirements and confirm whether consider that the current arrangements are appropriate. Should they wish to amend this, could they please set out where such a change should be made, and if requesting additional consultation explain why it is considered necessary.</p>	LCC in its statutory capacity as Local Highway Authority would expect to be named as a consultee in all requirements relating to highways and transport. The Applicant should revisit the wording of requirements on this basis.
Q8.3.3	<p>Requirement 4</p> <p>Could the applicants explain why the sustainable transport working group should only continue its duties for five years rather than in perpetuity, given the traffic generation figures for the life-time of the development are based on an effective travel plan? Furthermore, what arrangements should there be in place for a second and subsequent occupier of the buildings to ensure sustainable transport arrangements are continued?</p> <p>NWLDC, NH and LCC are all asked for their views on this.</p>	<p>The EMG2 Sustainable Transport Working Group (STWG) is proposed for 10 years from 2029, following the termination of the EMG1 STWG in 2028. The Framework Travel Plan (FTP) also references a 10-year period and sets out a high level of funding for the STWG and public transport improvements. LCC considers the time period to be reasonable and acceptable.</p> <p>LCC does, however, suggest that the FTP should be amended to require commitment from all subsequent occupiers of units within the 10-year period, and not just the first occupier.</p> <p>LCC requires the Applicant to demonstrate an acceptable and appropriate legal mechanism and associated financial contribution to monitor and implement the ambitions of the Sustainable Transport Strategy. LCC suggests that this would be most appropriately dealt with in a s106 Agreement.</p>
Q8.3.4	<p>Requirement 17</p> <p>Could the EA, LCC as local lead flood authority, and any person who is an approving body under schedule 3 of the Flood and Water Management Act confirm whether they are satisfied with the climate change allowance within this requirement. If not, could they set out what allowance each would seek and justify the quantum.</p>	<p>LCC understands that Schedule 3 of the Flood and Water Management Act has not been enacted in England.</p> <p>The proposed climate change allowances are in line with Environment Agency guidance: https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances</p>
Q8.3.6	<p>Schedule 2 – Part 2</p> <ul style="list-style-type: none"> • Are NWLDC and the highway authorities content with the eight-week period for determination of all matters as set out in paragraph 1(2)(a)? If not, what period would they consider appropriate? Should different periods apply to different works? Any answer should be justified. • Could the parties please give their views as to whether the phrase “before the end of the period in paragraph (a) or (b)” in paragraph 1(2)(c) is justified? • Are NWLDC and the highway authorities content with the fee arrangement set out in paragraph 3? If not, what arrangements should be put in place? 	LCC defers to NWLDC as the discharging authority in this matter.

	<ul style="list-style-type: none"> • In paragraphs 4(8) and 4(9) should “must” be replaced with “may” in case of an outside event so as to ensure natural justice? • In paragraph 4(13) should the appointed person be able to award costs under their volition? • In the definition of “discharging authority” should this be referred to as a “body” as any party can be a discharging authority; they do not need to be 	
Q8.4.2	<p>All parts</p> <p>All those who would benefit from the protective provision in the dDCO are requested to fully review them. Should the protective provisions not be agreed, then the party is to provide their own set of protective provisions both in ‘clean’ and ‘tracked change’ from that submitted by the applicant. Furthermore, the party needs to explain on a provision-by-provision basis why the drafting provided by the applicants is unacceptable and why its drafting is to be preferred.</p>	<p>LCC has raised the following concerns with the Applicant in respect of Protective Provisions:</p> <ul style="list-style-type: none"> • Drafting is overly complex and will be difficult to manage/implement • Drafting does not replicate LCC standard s278 provisions • Drafting does not reflect LCC bond requirements as set out at: https://www.leicestershirehighwaydesignguide.uk/fees-and-charges • LCC fees shall be set at 10% as is the LCC standard approach (and the standard approach of numerous Highway Authorities across the Country). LCC does not have the back-office systems or support to calculate and re-charge fees on a cost basis. • No reference is made to the adopted LCC Highway Design Guide available at: https://resources.leicestershire.gov.uk/environment-and-planning/planning/leicestershire-highway-design-guide • Definition of “as built drawings” is missing reference to: <ul style="list-style-type: none"> ○ Test results & records ○ Landscape drawings ○ Highway drainage drawings • Commuted sums should be payable <u>prior</u> to the issue of a Final Certificate <p>LCC comments on the dDCO have been submitted under separate cover. This includes track change comments on the dDCO.</p>
Q8.5.1	<p>Miscellaneous controls</p> <p>In the EM submitted as an additional submission [AS-015D] in response to the s51 advice issued at acceptance, the applicants have set out the reasoning for various disapplications of legislation. Would those who would otherwise be responsible for the issuing of appropriate approvals under the would be disappplied provisions comment as to whether they are content? If not, could they explain why they hold that view. If an ‘alternative’ position, for example one which may apply in</p>	<p>Schedule 14 – Paragraph 2 LCC does not agree with the disapplication of Section 141 of the Highways Act 1980. LCC may require this power to implement works for the dualling of the A453.</p> <p>Schedule 14 – Paragraph 3 LCC does not agree with the disapplication of Section 56(1) and 1(A) of the New Roads and Street Works Act 1991 to remove requirements for road space booking approvals.</p>

	<p>certain areas but not others were to be acceptable, the party is asked to set that out, explaining their position.</p>	<p>Schedule 14 – Paragraph 3 LCC does not agree with the disapplication of Section 58(1) of the New Roads and Street Works Act 1991 to restrict works in 12 months following substantial completion of works. This could fetter delivery of works brought forward by LCC or third parties (including statutory undertakers) including works necessary for the safe operation of the public highway. This is also the case for Section 73A(1)</p> <p>Schedule 14 – Paragraph 3 LCC does not agree with the disapplication of section 74 and 74A of the New Roads and Street Works Act 1991. Charges will be made to cover the cost of road space booking process and procedures.</p>
Q9.0.1	<p>Updated MCO at Procedural Deadline A</p> <p>At Procedural Deadline A, the applicant updated the dMCO [PDA-006M] with an explanation for those changes in the Schedule of Changes document [PDA-008]. All IPs are asked to review these changes and the justifications for them and submit any comments that they may have into the examination.</p>	<p>LCC comments on the dMCO have been submitted under separate cover. LCC maintains that all proposed works at the existing EMG1 access should be captured in the MCO and not split between the MCO and the DCO. LCC awaits a response from the Applicant on this matter.</p>
Q9.0.3	<p>Article 2(26)</p> <p>Could the applicants explain why any occupier should only comply with the travel plan for five years rather than in perpetuity, given the traffic generation figures are based on an effective travel plan for the lifetime of the development? Furthermore, what arrangements should there be in place for a second and subsequent occupier of the buildings to ensure sustainable transport arrangements are continued? NWLDC, NH and LCC are all asked for their views on this.</p>	<p>LCC requires a 10-year compliance period for occupier travel plans to reflect the FTP. As per LCC comments on Q8.3.3, the FTP should be amended to require commitment from all subsequent occupiers of units within the 10-year period, and not just the first occupier.</p>
Q11.0.7	<p>Effects on setting Diseworth Conservation Area</p> <p>In its RR [RR-002] LCC indicates that it considers the ES “underestimates the construction and operational impact of the proposed development upon the setting and character of the Diseworth conservation area”.</p> <p>Could LCC please explain why it holds the view set out in [RR-002], identifying the aspects of the applicants’ approach and/ or conclusions with which it disagrees (including in respect of construction and operational effects). Any differences between the approach followed by the applicants and LCC should be fully explained.</p>	<p>LCC consider that the Applicant’s assessment methodology outlined in the Environmental Statement (Section 12.2) [APP-133] is appropriate and in accordance with best practice.</p> <p>LCC has however raised concern that the assessment underestimated the construction and operational impact of the proposed development, specifically the EMG2 Main Site, upon the setting and character of the Diseworth conservation area. No significant impact is indicated in respect of the EMG1 Works or the proposed Highways Works.</p> <p>The assessment is presented in EMG2 - Environment Statement Chapter 12: Cultural Heritage, and Appendices as follows:</p> <ul style="list-style-type: none"> • A Built Heritage Assessment [APP-134] • Heritage Receptors for the EMG2 Project [APP-140]

		<p>LCC is satisfied that the Applicant’s assessment methodology is appropriate, and the above documents are acknowledged to be satisfactory with respect to their identification heritage receptors, specifically the identification of the Diseworth Conservation Area, and particularly the contribution offered by its historic agricultural landscape setting.</p> <p>It is acknowledged that the ridge and furrow earthworks noted in the Diseworth Conservation Area Appraisal and Study in ‘...the field areas immediately to the north of Hyam’s Lane’ have been impacted by recent agricultural land use, prior to the current development. Notably the removal of well-preserved earthworks of likely medieval date in the north west corner of the application site [APP-134].</p> <p>Ridge and furrow earthworks survive however, north of Hyam’s Lane and east of Grimes Gate adjacent to the development area. The earthworks are of uncertain date but exhibit characteristics of their medieval origin. To the south of Hyam’s Lane, adjacent to the conservation area, further ridge and furrow earthworks are present, although probably of post-medieval form (more regular and straighter in alignment). Also of relevance is the location of an earthwork mound, adjacent to the western edge of the development area, the latter is listed on the Leicestershire Historic Environment Record available at: https://www.leicestershire.gov.uk/leisure-and-community/history-and-heritage/historic-environment-record as a probable windmill mound (HER ref.: MLE4744). Neither of the latter sites are directly referenced in the Conservation Area Assessment, but both contribute as non-designated heritage assets to its significance.</p>
Q11.0.12	<p>Archaeological evaluation</p> <p>Appendix 12F [APP-139] states that the evaluation was originally designed to comprise 391 trial trenches but, following agreed changes, 388 trial trenches were excavated, with decisions regarding trenches made with the approval of LCC. Further paragraph 1.2.2 states that the results facilitate an informed decision regarding the requirement for, and methods of, any further archaeological mitigation.</p> <p>ES chapter 12 table 12.6 [AS-051] records LCC’s scoping position that the assessment should consider the results of the previous archaeological evaluation at EMG1 and the EMG2 main site and that the need for any further archaeological evaluation should be identified.</p> <p>Could the applicants please explain/ confirm:</p> <ul style="list-style-type: none"> whether the applicants consider the archaeological evidence base in the ES chapter 12 appendices is sufficient at this stage to define the mitigation 	<p>LCC can confirm that full dialogue and agreement was achieved between the Applicant’s archaeological advisor and LCC over the completion of the archaeological trial trenching programme.</p> <p>Additionally, LCC have advised that the trial trenching programme has been sufficient and adequately undertaken. No additional pre-determination trial trenching has been requested on any aspect of the scheme including the Highway Works, the latter due to the impracticality of targeting the affected areas in advance of the determination of the DCO.</p> <p>Further archaeological investigation (to be secured by Requirement) will target investigation of the archaeological impact of the planned Highways Works. Details of this further investigation must be detailed in the Archaeological Mitigation Strategy.</p>

	<p>approach</p> <ul style="list-style-type: none"> whether any further pre-determination evaluation is required for any part of the authorised development (including Highway Works), and if not, why not <p>If LCC considers further evaluation is required, please identify where and why.</p>	
Q13.0.3	<p>Scoping and assessment of risks</p> <p>Are you satisfied with the scoping and assessment of MAD in chapter 20 of the ES [AS-071] and appendix 20A [APP-198]?</p>	LCC defer to North West Leicestershire District Council, the Civil Aviation Authority and East Midlands Airport on this matter.
Q13.0.19	<p>Major Hazard Site H4798</p> <p>In relation to the Major Hazard Site H4798 does the EMG2 project require evacuation procedures to be secured in the dDCO and dMCO in the event of an impending MAD?</p>	LCC defer to North West Leicestershire District Council on this matter.
Q13.0.20	<p>Cumulative assessment of MAD risk</p> <p>Has chapter 20 of the ES [AS-071] assessed the cumulative risk associated with the East Midlands Freeport projects and other large scale projects in the locality? For example, could there be cumulative effects on aerodrome safeguarding through lighting or glint and glare from building materials etc.? Furthermore, has the cumulative displacement of farmland bird species and surface water drainage attenuation been considered in the context of bird strike risk? Does NWLDC, LCC or EMIA have any comments to make in this regard?</p>	LCC defer to East Midlands Airport on this matter. LCC has raised the matter of surface water attenuation and potential bird strikes with the Applicant.
Q14.0.1	<p>Waste Data Interrogator</p> <p>ES chapter 18 paragraph 18.2.52 [AS-067] states within Limitations and Assumptions that the assessment is based on “the most recent publicly available information which is up to and including 2023” and cites the 2023 Waste Data Interrogator in the references.</p> <p>In its RR LCC [RR-002] requests that the ES chapter be updated to use the latest Waste Data Interrogator (noting that 2024 data is available).</p> <p>Could the applicants and LCC:</p> <ul style="list-style-type: none"> please confirm whether more recent Waste Data Interrogator data (2024 or post-2023) is available and, if so, whether it has been considered explain whether use of post-2023 data would materially change the waste capacity/ void capacity baseline, the significance conclusions and/ or the mitigation set out in ES chapter 18 if an update is required, provide an updated schedule/ table identifying which paragraphs/ tables would change and confirm whether any updated assessment would alter the conclusions in sections 18.5 to 18.9 	<p>LCC continue to work with the Applicant team to ensure a mutual understanding of the data. LCC can confirm that the Environment Agency’s 2024 Waste Data Interrogator (WDI) was published on 23rd September 2025 and was therefore available to the Applicant prior to the submission of the DCO application.</p> <p>LCC have consistently that the Applicant should use the most up to date data available. It is for the applicant to demonstrate to the ExP and LCC whether there would be a material impact and what this would be.</p> <p>LCC understands that the Applicant has undertaken an exercise to review the data, but it remains unclear as to whether the Applicant intends to submit this information into the examination.</p>

<p>Q14.0.2</p>	<p>Expansive Study Area</p> <p>ES chapter 18 paragraphs 18.2.15 and 18.2.16 [AS-067] defines the Expansive Study Area as a “radius of 30 miles” and also states that “an isochrone 30-mile radius from the EMG2 Project has been proposed with justification in appendix 18C [APP-188]. Appendix 18D [APP-189] presents the Expansive Study Area as a set of 10/20/30 mile buffers. The LCC Contact Log [APP-186] records that LCC requested clarity on whether the agreed boundary is based on vehicle miles or an isochrone approach.</p> <ul style="list-style-type: none"> confirm precisely what boundary was applied in ES when identifying and assessing waste and materials infrastructure capacity (whether circular 30-mile buffer, travel-time isochrone, or other), and confirm how this aligns with appendix 18D explain how the subsequent “Refined Study Area” approach (paragraphs 18.2.18–18.2.19) ensures that relevant facilities/ void capacity is not omitted from the assessment, particularly in authorities that fall within the 30-mile buffer but are excluded from the refined assessment 	<p>LCC await the Applicant’s response to this question and will provide comment at the next appropriate deadline.</p>
<p>Q14.0.3</p>	<p>Site Waste and Materials Management Plan (SWMMP)</p> <p>ES chapter 18 paragraph 18.5.84 [AS-067] states that the principal mitigation measure is implementation of the CEMP and phase-specific P-CEMPs submitted pursuant to dDCO requirement 11, and further in paragraph 18.5.85 states that, although not required by regulations, a Site Waste and Materials Management Plan (SWMMP) will be regularly updated during the lifetime of the DCO Scheme and is provided as appendix 18E [APP-190].</p> <p>The CEMP paragraph 10.1 [AS-027D] states that each P-CEMP shall set out details of construction waste management in accordance with the SWMMP. Appendix 18E [APP-190] refers to the SWMMP “submitted with the DCO application” being “approved” and then reviewed/ updated (including refinement “in consultation with the local planning authority”) and also contains reliance/ disclaimer wording limiting third-party reliance.</p> <p>The Commitment Register [APP-226D] links the SWMMP to a waste management commitment (MW1) secured via dDCO requirement 24.</p> <p>Could the applicants, LCC and the EA:</p> <ul style="list-style-type: none"> confirm whether the SWMMP (appendix 18E) is relied upon to secure the mitigation identified in ES chapter 18 and, if so, at what stage it is intended to be “approved” and by whom 	<p>As detailed in LCC Relevant Representations [RR-002], LCC remain concerned that there appears to be no commitment within the dDCO [PDA-005D] that a Site Waste Management Plan (SWMP) will be prepared prior to commencement of construction, in line with relevant legislation and best practice (e.g. CL:AIRE Code of Practice).</p>

	<ul style="list-style-type: none"> explain how updates to the SWMMP will be controlled and enforced through the DCO (including the relationship between the CEMP/ P-CEMPs, requirement 24, and any operational waste management arrangements) confirm whether any amendment is required to the dDCO and/ or the CEMP/ SWMMP wording to ensure the SWMMP is clearly secured, enforceable and capable of being relied upon for the purposes of the Examination confirm whether, and if so how, the EA and relevant waste planning authorities will be engaged during discharge/ implementation where the SWMMP relies on regulatory compliance processes (including Duty of Care and any permitting/ exemption requirements) 	
Q14.0.5	<p>Hazardous waste</p> <p>The paragraphs 18.9.5 and 18.9.12 of the ES chapter 18 [AS-067] states for both the DCO Scheme and the MCO Scheme that potential arising of hazardous waste has not yet been quantified, but that the worst-case scenario does not anticipate hazardous waste arisings greater than 0.35% of the regional hazardous landfill void capacity.</p> <p>Please could the applicants provide:</p> <ul style="list-style-type: none"> a worst-case quantified estimate of hazardous waste arisings for the DCO application and the MCO application, separately for construction and operation, identifying the hazardous waste streams assumed for operation with reference to the ES chapter 18 paragraph 18.6.32 the calculation and inputs showing how the 0.35% figure has been derived the assumed management route(s) for hazardous waste, including how the absence of hazardous landfill capacity within the Refined Study Area has been addressed in the assessment assumptions <p>LCC and the EA are also asked to comment on this matter.</p>	LCC defers to the Environment Agency on this matter.
Q17.0.6	<p>Reliance on transport modelling</p> <p>ES chapter 17 table 17.3 [AS-065] states LCC's concern that the Population and Human Health assessment and Equality Statement rely on transport modelling that was not complete/ agreed at the time of consultation, and the applicants response states that the assessment has been reviewed using the latest modelling assumptions.</p> <p>Could the applicants please explain:</p>	<p>LCC notes that the Applicant's Population and Human Health Chapter assessment [AS-065] and Equality Statement rely on transport modelling assumptions that remain incomplete and not agreed.</p> <p>LCC maintains that conclusions within both the Population and Human Health Chapter assessment and the Equality Statement cannot be fully considered until final transport modelling is completed and agreed. This is because the factors assessed in the Population and Human Health Chapter assessment — including severance and access, active travel, road safety and community safety, and traffic-related air quality and</p>

	<ul style="list-style-type: none"> • what transport evidence base has been relied upon to inform the Population and Human Health assessment conclusions in ES chapter 17, including whether the assessment relies on modelling outputs for severance/ access, active travel, road safety or community safety pathways • whether any subsequent changes to transport modelling assumptions or outputs during Examination would require a re-check of ES chapter 17 conclusions (including equality appraisal conclusions), and if so, what process the applicants propose for that re-check and reporting and • whether the applicants consider that any such re-check could result in materially different health conclusions, and if not, explain why not <p>LCC is also invited to comment on this matter.</p>	<p>noise — are all directly shaped by traffic volumes, routing and infrastructure design. Without agreed modelling, these conclusions cannot be regarded as fully accurate or reflective of the likely impacts.</p> <p>Although the Applicant has indicated that the assessment has been ‘reviewed using the latest assumptions’, no complete or agreed modelling outputs have yet been provided to LCC, meaning the assessment cannot be considered representative of likely impacts.</p> <p>The Applicant has now agreed in principle that any changes to the transport modelling would require a proportionate update to the Population and Human Health Chapter assessment and the Equality Statement as per LCC request. This would involve providing LCC with the final agreed modelling, re-checking all transport-linked health pathways, updating cumulative assessments, and revisiting equality conclusions. LCC considers it entirely reasonable to expect that updated modelling could result in changes to the Population and Human Health Chapter assessment and Equality Statement conclusions. This reflects the Applicant’s own acknowledgement that, should the revised modelling indicate higher impacts, both assessments would require updating, and that even where impacts reduce, further consideration may still be needed to determine whether conclusions should be narrowed or adjusted. Given that key health determinants — including safety, access, air quality, noise and connectivity — are directly influenced by traffic volumes and routing, any change in the modelling has the potential to alter both the significance of effects and the differential impacts on vulnerable groups.</p>
Q17.0.7	<p>Health Impact Assessment (HIA)</p> <p>ES chapter 17 table 17.3 [AS-065] records that, following engagement with LCC, HIA principles are fully embedded within ES chapter 17 and the standalone HIA appendix is no longer required.</p> <p>Could the applicants please explain:</p> <ul style="list-style-type: none"> • where, within ES chapter 17, the key HIA components are now presented (including determinants/ pathways, baseline vulnerability, assessment of effects, and mitigation), and how appendix 17C [APP-183] is relied upon for equality considerations • whether removal of the standalone HIA appendix resulted in any changes to the scope or content of the assessment compared to the position discussed with LCC, and if so, what those changes are, and 	<p>LCC’s position remains that removal of the standalone HIA appendix was accepted only on the basis that all HIA content would be fully and transparently integrated into the Population and Human Health Chapter assessment, with no loss of analysis.</p> <p>The Applicant has submitted a technical note directly to LCC, which is welcomed as it provides some useful clarification on transport-modelling updates and the air-quality assessment approach; however, it is not clear whether this document has been, or will be, submitted into the Examination. LCC will therefore reserve its position until this information is formally submitted for consideration by the ExP and other Interested Parties.</p> <p>Notwithstanding this, further clarification and explicit signposting within ES Chapter 17 [AS-065] is still required to ensure that the embedded HIA approach is transparent for Examination and to confirm whether any updates arising from the final transport modelling would affect conclusions within the Population and Human Health Chapter assessment or the Equality Statement.</p>

	<ul style="list-style-type: none"> whether any additional signposting or clarification is required in ES chapter 17 to ensure the embedded HIA approach is transparent for examination, confirming whether any update would affect the reported conclusions <p>LCC is also invited to comment on this matter.</p>	
Q17.0.8	<p>Study area and baseline health data</p> <p>ES chapter 17 explains at paragraph 17.2.3 [AS-065] that baseline health data relevant to environmental health determinants is focussed on administrative wards within 500m of the EMG2 Project, and at paragraph 17.2.4 that ward-level trend data is not readily available and therefore baseline data presented primarily relates to NWLDC, which is considered representative of the wards; it further states that data at the lowest geographic level possible is used for quantitative assessment. ES chapter 17 paragraph 17.2.23 repeats this as a limitation/uncertainty.</p> <p>Appendix 17B [APP-182] presents the population and health baseline, explaining that the district study area comprises North West Leicestershire district and that the ward study area is used where possible.</p> <p>Could the applicant please how:</p> <ul style="list-style-type: none"> they have satisfied themselves that the district-level baseline health outcome data referenced at paragraph 17.2.4 is sufficiently representative for the populations most likely to experience effects within the ward study area defined at paragraph 17.2.3, how the assessment has addressed the possibility that health inequalities or pockets of vulnerability within/ adjacent to the 500m ward study area could be masked by use of broader-area baseline indicators, noting the approach described at paragraphs 17.2.4 and 17.2.23, and where, in ES chapter 17 and/ or appendix 17B, explicitly linked the baseline geography used for health outcomes (district level) to the localized determinants assessment (ward/ receptor outputs), so that the reasoning chain from paragraphs 17.2.3–17.2.4 into the effect conclusions is clear. <p>LCC is also invited to comment on this matter.</p>	<p>LCC do not hold data at this level. However, data is available at a Middle Super Output Area (MSOA) level that would demonstrate variation across North West Leicestershire District. This data is publicly accessible at https://fingertips.phe.org.uk/profile/local-health and would provide a local demonstration of the population health of the area of the study.</p>
Q19.0.1	<p>AECOM</p> <p>It is noted the AECOM has been commissioned by the applicants, NH and LCC in relation to the proposed development to support their individual positions. Could the parties set out their</p>	<p>In respect of commissioning of PRTM modelling, LCC commissioned AECOM on behalf of the Applicant through the LCC Modelling Services Contract. This process is set up to ensure independence and impartiality</p>

	<p>individual relationships (non-financial) with the company, along with what arrangements are in place to ensure that there has been no conflict of interests within AECOM?</p>	<p>of the professional services procured through the Modelling Services Contract from any other internal team involved in the audit and review of the Applicant's submission.</p> <p>For absolute clarity, LCC have not procured or involved the services of AECOM in the review or auditing of submitted work by the Applicant for the EMG2 DCO project, which has been undertaken independently within LCC by Officers directly employed by LCC.</p>
Q19.0.5	<p>Signage in Castle Donington area</p> <p>In paragraph 8.37 of the TA [APP-080], in discussing traffic around Castle Donington, it is noted that LCC might seek additional signage to route traffic around the bypass rather than along High Street.</p> <p>Could LCC confirm whether it would seek such signage?</p> <p>If so, could the applicants please indicate how such signage would be secured?</p>	<p>LCC awaits confirmation from the Applicant of what existing signage on the Local Road Network (LRN) is proposed to be amended, and what additional signing is to be provided to encourage use of the Castle Donington Relief Road.</p>
Q19.0.6	<p>Dualling of A453 west of Finger Farm Roundabout</p> <p>At ISH1 there was discussion about the potential dualling of the A453 west of Finger Farm roundabout.</p> <p>Could LCC please set out:</p> <ul style="list-style-type: none"> • what, if any, proposals have been drawn up for this section of road, providing drawings if necessary • any timetable for potential works or triggers for a requirement, and how land would be secured and funding for the works themselves provided <p>The applicants are asked:</p> <ul style="list-style-type: none"> • does the response have any implications in relation to your response to ExQ1Q2.0.6? <p>Prologis and EMIA are asked to set out their understandings of this matter, along with any matters within the joint application which would impinge on that.</p>	<p>No scheme has been developed by LCC for potential dualling of the A453.</p> <p>However, the Applicant is part of a developer consortium who are progressing cumulative assessment of the impacts of growth in this area and through that work, LCC has been provided with a drawing showing a dualled section of the A453. Unfortunately, this drawing is not within LCC's gift to share with the ExP within the public domain, but it is within the gift of Applicant to do so.</p> <p>LCC understands that the Applicant will be including a requirement in the next revision of the dDCO to safeguard land along the EMG2 main site frontage with the A453 for future dualling. LCC reserves its position until a revised dDCO is submitted that reflects this change together with an associated plan.</p>
Q19.0.9	<p>Departures from highway standards</p> <p>The applicants have set out various departures from standards for the highways to be provided (see appendices 26 and 27 of the TA [APP-082]). Could NH and LCC please formally consider whether there are likely to be any issues in approving details post-consent?</p> <p>The ExP notes that once in principle consent has been granted the Courts have indicated that it would not be possible to refuse consent at the detailed design stage.</p>	<p>The Applicant has amended their current design for the LRN to remove the necessity for a departure. However, LCC reserves its position on this matter pending the resolution of PRTM2023 modelling and final understanding of the impacts on the LRN, should any further design changes be required.</p>
Q19.0.11	<p>Isley Woodhouse development</p>	<p>Isley Woodhouse is an emerging site allocation within the emerging NWLDC Local Plan. The Isley Woodhouse site promoters are also members of the Growth Point consortium alongside the Applicant. As</p>

	<p>LCC is concerned to ensure that none of the proposed development would prejudice the delivery of any of the proposed allocations in the emerging local plan. Could the applicants please explain:</p> <ul style="list-style-type: none"> • what measures it has undertaken to ensure that this does not occur; and • provide us with evidence to support any response? <p>LCC, NH and NWLDC are all asked for comments in relation to the proposed Isley Woodhouse development.</p>	<p>detailed above in response to Q19.0.6 LCC wish to see land along the EMG2 main site frontage with the A453 safeguarded and dedicated as public highway to allow future delivery of a dualling scheme to address the impacts of wider growth. Without this safeguarding, there is a risk that the EMG2 development (if permitted) could fetter delivery of wider growth, including, but not limited to, the Isley Woodhouse emerging allocation.</p>
Q19.0.15	<p>Traffic modelling</p> <p>Paragraph 14.27 of the TA [APP-080] indicates that there would be an increase of queuing on the Bostocks Lane arm of Junction 79 (M1 J25) of some 11.2%, that is from 133.8 PCUs to 148.8 PCUs. The applicants have described this increase as ‘negligible’ and would not affect the operation of the arm.</p> <p>NH and LCC are asked for their views as to the analysis and whether they consider any mitigation works are required at this junction from the effects of the proposed development taking into account paragraphs 5.281 and 5.282 of the NPSNN.</p>	<p>Given the geographical location of M1 J25 LCC defer to National Highways/Nottinghamshire County Council on this matter.</p>
Q19.0.16	<p>Road Safety Audits</p> <p>There was discussion at ISH1 as to road safety audits. Could the applicants please ensure that any further road safety audits or iterations of those completed to date are submitted as they become available.</p>	<p>LCC will continue to engage in the Road Safety Audit (RSA) process. LCC has responded to the Stage 1 RSA and signed the Designer’s Response for the proposals on the LRN. However, LCC reserves its position on this matter pending the resolution of PRTM2023 modelling and final understanding of the impacts on the LRN, should any further design changes be required.</p>
Q19.0.17	<p>Traffic signals</p> <p>What analysis has been undertaken of ensuring the phasing between the various traffic lights in the vicinity of the EMG1 and EMG2 sites are co-ordinated to ensure the maximum free-flowing of traffic?</p> <p>If none has been done to date, what analysis could be undertaken, and should this recommend particular solutions, how would these be secured?</p>	<p>LCC defer to National Highways on this matter.</p>
Q19.0.19	<p>Relationship of the Pan Regional Traffic Model and the East Midlands Freight Model</p> <p>Paragraph 6.4.10 of chapter 6 of the ES [AS-032] refers to both the PRTM, and the EMFM. While it is appreciated that the EMFM is a part of the PRTM, could LCC confirm whether it is content with the use of the EMFM, and its view as to the base date of the model to be used.</p>	<p>EMFM refers to the LCC East Midlands Freeport Model. This model is a cordoned part of the larger PRTM2019 model. Given the availability of PRTM2023 LCC requested this to be used in the assessment of EMG2 as the most appropriate and up to date tool available to the Applicant.</p>
Q19.0.20	<p>Work No 19</p>	<p>The s106 Agreement for EMG1 completed on 19th June 2015 required the Applicant then “Roxhill Limited” to contribute the sum of £181,000.00 (index linked) for the maintenance and upgrade of footpath L57. In April</p>

	<p>In paragraph 6.7.1 of chapter 6 of the ES [AS-032], fifth bullet, tenth sub-bullet, reference is made up upgrading footpath L57 between Diseworth Lane and Castle Donnington. This indicates that payment was made to LCC until the Planning Obligation for EMG1, but the works have never been carried out and the ExP was</p> <ul style="list-style-type: none"> • Could LCC explain its understanding on this matter. • Could the applicants please provide us with a copy of the s106 Planning Obligation. • Could the applicants please explain why this link is justified in relation to the current application of which it forms part? 	<p>2019 SEGRO EMG Ltd paid the sum of £200,252.32 to LCC. LCC designed a scheme for implementation. In September 2023 this scheme was costed at £314,000.00 for LCC to deliver i.e. LCC were met with a £140,000.00 funding gap.</p> <p>SEGRO considered carrying out the works (but had no legal powers to do so because the works were not defined in the EMG1 DCO) and considered funding the gap to facilitate LCC delivery. On the basis that the EMG1 MCO and EMG2 DCO applications were in development, SEGRO made the decision, supported by LCC, to include the works within this application for SEGRO to deliver. LCC has since returned the s106 monies to SEGRO (minus the LCC design costs) as per the terms of the s106 Agreement.</p>
Q19.0.21	<p>TA Appendices 45 and 46 [APP-082]</p> <p>Appendix 46 to the TA VISSIM Local Model Validation Report indicates in paragraph 2.10 that surveys have identified the network peak hours as 0730 to 0830 and 1700 to 1800. However, other documents, such as Appendix 45 EMFM Stage 1B Modelling Forecasting Report Addendum have identified the peak hours as 0800 to 0900 and 1700 to 1800.</p> <p>Could the applicants, NH and LCC comment as to whether the difference in the morning peak have any implications for the modelling and the analysis thereafter?</p>	<p>LCC defers to National Highways on this matter.</p>
Q19.0.25	<p>Sustainable Transport Strategy [APP-084]</p> <p>Could NWLDC, LCC and NH comment on whether they consider that the one week taster bus tickets would be sufficient to provide an incentive? If they consider a different period would be more appropriate, could they provide that timeframe, providing a justification.</p>	<p>LCC requires the Applicant to provide one six-month bus pass to each employee at no cost to the employee. This is to encourage new employees to use bus services, to establish changes in travel behaviour from first occupation and promote use of sustainable travel modes other than the car.</p>
Q19.0.26	<p>Work No. 15</p> <ul style="list-style-type: none"> • Could the applicant's explain why the pedestrian access across the A453 would be an uncontrolled crossing rather than integrated into the existing junction as a controlled crossing? • Could LCC and NWLDC comment on the proposition that this should be so integrated. • Would this have any implications for the traffic modelling. 	<p>The Applicant has proposed a new PRoW (points 10 to 11) [APP-037D] and a short section of footway directing pedestrians to cross the A453 at the signal-controlled junction for East Midlands Airport. However, this signal-controlled junction has no pedestrian provision.</p> <p>Moreover, neither a detailed design, assessment, or Road Safety Audit (RSA) appear to have been produced by the Applicant for this crossing point. The appropriateness of the crossing should be determined via an assessment based on Traffic Signs Manual Chapter 6 guidance available at: (https://assets.publishing.service.gov.uk/media/5df0e29fed915d15f42c4820/dft-traffic-signs-manual-chapter-6.pdf) and a comprehensive package of information submitted to the Examination. LCC reserves the right to comment further on the safety and suitability of this crossing provision.</p>
Q21.0.2	<p>Operational Environmental Management Plan</p> <p>The EA [RR-016] notes that the applicants should commit to producing an OEMP in order to secure appropriate operational mitigation related to pollution of the water environment. Please</p>	<p>LCC defers to the Environment Agency on this matter</p>

	<p>can the EA advise if there are any other areas where an OEMP could help mitigate the proposed development's environmental impacts. For example, could an OEMP help mitigate potential operational emissions and air pollution etc. and are there any precedents for such an approach in other made DCOs?</p> <p>Please can the applicants comment whether an OEMP would be necessary to help mitigate operational environmental impacts. If the applicants are of the view that an OEMP would not be necessary, please identify existing provisions within the dDCO and dMCO that would secure the necessary mitigation measures for the operational phase of the proposed development.</p> <p>Does NWLDC and LCC have a view on whether an OEMP would be necessary in the context of the above?</p>	
Q21.0.3	<p>Performance of EMG1 drainage systems</p> <p>A number of RRs [RR-030D and others] raised significant concern about flooding in Kegworth, particularly in relation to the construction of EMG1 and Kegworth Bypass. Please can the applicants, LCC and the EA advise whether there is any ongoing monitoring of EMG1's drainage systems and whether it can be determined that such systems are performing in line with the modelling conducted as part of the EMG1 application?</p> <p>Furthermore, the ExP are particularly interested in whether LCC or the EA have any evidence that might corroborate the concerns raised in the RRs, that there has been an increase in local flooding since EMG1 was constructed. If there has been an increase, please can LCC and the EA advise whether there is any potential that this could be objectively attributed to EMG1, including Kegworth Bypass, and whether a more precautionary approach to modelling should be required for the proposed development?</p>	<p>LCC in its capacity as LLFA is currently engaging with a range of stakeholders in relation to queries relating to the Kegworth Bypass and the associated drainage network. This includes a recent site walkover with elected members and affected residents.</p> <p>LCC in its capacities as LLFA and Local Highway Authority are seeking to undertake verification checks on the design and modelling completed prior to the construction of the scheme.</p> <p>The LLFA is unable to attribute direct blame to any specific factor due to the nature of flood events and a range of factors within catchments but will seek to recommend remedial actions are taken should evidence suggest such works are required. There is no evidence at this stage to suggest the modelling approach for EMG1 was insufficient.</p> <p>The LLFA is working closely with the Applicant in respect of the EMG2 proposals. As a part of this process, the LLFA has raised concerns relating to the existing drainage issues within the area and advised that the Applicant must ensure that the proposed development complies with relevant policies and best practice.</p>
Q21.0.5	<p>Greenfield runoff rates</p> <p>Protect Diseworth [RR-025D] raised a significant number of concerns in relation to flood risk, including greenfield runoff rates. Please can the applicants clarify the greenfield runoff rate associated with existing surface water on the northern part of the EMG2 main site and community park that currently drains into Hall Brook?</p> <p>If it is lower than the greenfield runoff rate associated with existing surface water on the southern part of the EMG2 main site and community park that currently drains into Diseworth Brook, via the A42 culvert, would the proposed strategy within the Sustainable Drainage Statement [APP-</p>	<p>The proposed discharge rate is QBar (approximately the 1 in 2-year event equivalent) for up to the 1 in 100-year event, which represents approximately 40% of the existing discharge rate in this event, while also making a further allowance for climate change.</p> <p>No discharge to Hall Brook is proposed, removing some existing greenfield catchment from upstream of Diseworth. Hall Brook confluences with Diseworth Brook, so all flows to Hall Brook currently end up in Diseworth Brook.</p>

	<p>149] inadvertently increase the rate of surface water entering the Long Whatton Brook catchment as a whole?</p> <p>For example, would the EMG2 works take surface water currently being discharged at a lower rate into Hall Brook, and instead discharge it at a higher rate into Diseworth Brook, via the A42 culvert? Consequently, would this increase the rate of some of the surface water entering the Long Whatton Brook catchment compared to baseline? As such, would there be an increase in flood risk elsewhere as a result of the proposed development?</p> <p>Does the EA, NH or LCC have any comments to make on this matter?</p>	<p>All proposed site surface water will bypass Diseworth Village being discharged to the downstream Diseworth Brook. The catchment area to Diseworth Brook is not increased as a result of the proposed EMG2 development.</p> <p>It is understood that flooding downstream in Long Whatton is not as a result of Diseworth Brook.</p> <p>Reduced peak discharge rates from the proposed site are also intended to mitigate flood risk downstream.</p>
Q21.0.9	<p>Climate change scenario</p> <p>Paragraph 13.5.92 of chapter 13 of the ES [AS-056] states in accordance with best practice and local and national requirements, the drainage infrastructure will be designed to manage the design storm (the 1 in 100-year+25% storm) as well as the resilience check storm (the 1 in 100-year+40% event). Does Requirement 17(1)(a) in the dDCO need to be amended to state that the drainage infrastructure would be designed to manage the 1 in 100-year+40% event?</p>	<p>LCC consider that the dDCO should align with Chapter 13 of the ES [AS-056].</p>
Q22.0.5	<p>CEMP – Surface water storage</p> <p>Paragraph 19.2 of the CEMP indicates that any onsite surface water storage during construction will be to the 1 in 100 year storm event “with an appropriate uplift for climate change applied will be provided (to align with the consenting authorities [sic] requirements)”. Is it possible to include the relevant percentage at this time? If not, could an explanation be included as to how the percentage would be derived.</p>	<p>Environment Agency guidance states:</p> <p><i>For development with a lifetime up to 2060, take the same approach but use the central allowance for the 2050s epoch (2022 to 2060).</i></p> <p>The construction phase for EMG2 if permitted will fall within this 2022 to 2060 time frame.</p> <p>The climate change central allowance for this area is 20%.</p>

East Midlands Gateway Phase 2 – East Midlands Gateway Rail Freight Interchange Material Change - LCC responses to Examining Panel (ExP) ISH1 Actions assigned to LCC – Deadline 1 - 7th April 2026

ExP reference	Action	Response
ISH1 AP No.7	<p>To provide a written note in relation to the highway works (Part 2 of Schedule 1 of the draft Development Consent Order (dDCO)), including whether those works are:</p> <ul style="list-style-type: none"> a. necessary as a consequence of the commercial and business development in Part 1 b. required in their own right due to existing and/ or future traffic conditions in the area absent the proposed development in part 1 c. necessitated by any planning permission that may be forthcoming on the northern part of the site d. required in relation to other forthcoming developments e. in combination, whole of part, of the any of above or f. for any other identified reason. 	LCC defer to National Highways on this matter noting that the works are principally on the SRN.
ISH1 AP No.18	<p>To provide clarification on whether the development of the EMG2 site would affect the modelled and/ or surveyed traffic results for the EMG1 site, including how traffic flows between the rail freight interchange and EMG2 have been accounted for, and confirmation that no double-counting of traffic into the wider network occurs.</p>	<p>The Applicant has included a notional quantum of movements from EMG2 to/from EMG1 in their assessment. An explanation of how this quantum was reached, and the proposed interaction between the two sites is best explained by the Applicant.</p>
ISH1 AP No.20	<p>To confirm the position regarding the use of the EMGP1 zone as the most appropriate proxy for the EMFM Construction Traffic Forecasting assessment, given paragraph 2.3.4 of Appendix 74 of the Transport Assessment (TA) [APP-083] states that there is no EMFM zone in the immediate vicinity of M1 Junction 24.</p>	<p>On the basis that there is no EMFM zone in the immediate vicinity of M1 Junction 24 LCC consider that the EMGP1 zone is the most appropriate proxy for the EMFM Construction Traffic Forecasting assessment.</p>
ISH1 AP No.21	<p>Current position and future implications for the proposed development in the context of dualling of the section of road north of the EMG2 site including mechanisms for delivery</p>	<p>Please see above responses to questions 19.0.6 and 19.0.11.</p>