

Relevant Representation – a follow up emphasis ahead of Deadline 1

We await with interest the publication of NWLDC and LCC Local Impact Reports, Actions by SEGRO and other interested parties agreed at the first round of hearings, and the responses to EXQ1.

Referring to my original RR (*italics*) and new emphases in **bold**. AI has not been used in the formulation of this RR.

“ Pressures on EMA itself as the key inland Freeport partner which result from the location of the EMG1 site, the EMG2 site....”

Is the Principle of Development on this site and this location predicated on direct air freight handling? The EM Freeport has EMA as its core strategic transport link, so how have EMA’s current and future development needs, now impossible on the North side of the runway, been factored in to the dDCO? If Maersk or other key partner have commercial interests in air freight, should that be declared?

“The anomalous nature of this nationally disproportionate DCO application in terms of size, importance, economic reach and coherence.”

Notwithstanding the recent section 17 letter, how can the DCO be decided fairly and independently of the Freeport tax site expiry date, generally and particularly in relation to National Infrastructure and the Strategic Road Network(SRN) when the necessary work to this section of the M1, including J23A and J24 did not feature in Road Improvement Strategy 3 (RIS 3) dated March 26th 2026

“Industry and speculator driven view of demand for strategic warehousing, the conflicts with local planning and the exacerbation of constraints on this pinch point in national strategic transport infrastructure that has failed to attract national funding under successive governments.”

The NWLDC emerging Local Plan, still at Regulation 18 stage, and the Leicester and Leicestershire SoCG on strategic warehousing are predicated by a report from ICENI which gives no site specific justification for this site. ICENI set out a massive commercially driven target but otherwise merely set out a generic case for one form of corridor distribution of sites. There is no testing of other alternatives, to justify the final recommendation. The report failed to factor in suitable sites just beyond the Leicestershire county boundary that are potentially better located, less likely to result in significant environmental and traffic impacts and thus are more likely to be deliverable than this site. Allowing the county boundary to form a firm redline for the evaluation, rather than considering the relative merits of sites in a buffer zone 2-3 miles beyond is simply bad planning practice and poor analysis that

does not merit the weight the promoting parties are seeking to ascribe to it. To state the obvious, economic, commercial and business rate gains are not material planning criteria.

It is pertinent to ask whether the Applicant has so far provided sufficient evidence to demonstrate that there is no other better or equivalent site available. Has the Applicant so far offered a sufficiently detailed assessment of all the factors that would normally be considered in a site specific appraisal to demonstrate that this site is both needed and suitable for the purpose proposed? Further, can all impacts be mitigate appropriately within the overall cost envelope of the scheme? There has been no material evidence presented on scheme finances or viability to demonstrate that the kind of traffic and public transport measures, landscaping, noise suppression, drainage, biodiversity provision etc that will be required are capable of being funded by the Applicant alone even if National Highways support for a partial J24 scheme only should be forthcoming?

“The continuing failure to plan warehouse capacity and strategic priorities across three counties and four Freeport site, all driven by the relative demarcation of separate planning regimes in zones either side of the nearby River Trent, a situation made worse for every month that Leicestershire is outside the Combined East Midlands Mayoral Authority (EMCCA)”

I note that:

The Principle of Development on this site has not been established in the NWLDC Local Plan and that this site and other nearby sites were designated as being suitable for strategic warehousing over a year after the Regulation 18 stage and as recently as Nov 19th 2025.

Although the designation of EMCCA as a Spatial Planning Strategy area has not yet been confirmed by MHCLG, it would be appropriate for EMCCA to take part in the Examination as a statutory consultee.

The emerging Leicester and Leicestershire SoCG on strategic warehousing does not refer to the consideration of sites outside the County boundary. Yet in the period 2021-24 NWLDC was a key player in the East Midlands Development Company as follows (source NWLDC website)

“Supported by the Midlands Engine, it is driving the transformation of three sites:

- The East Midlands Airport area (in North West Leicestershire)**
- The Ratcliffe-on-Sour Power Station area (in Rushcliffe, Nottinghamshire)**
- Toton and Chetwynd East Midlands Hub (in Broxtowe, Nottinghamshire)”**

“The unproven case regarding the success of the EMG1 railhead, its unnecessary close proximity to EMA, current freight terminal usage, cargo-miles travelled and independent cargo-journey analysis across all EMG1 users , and stated overall Freeport objectives,(skills, manufacturing etc)”

I note the following quoted reference in the Leicester and Leicestershire strategic warehousing SoCG to the Secretary of State’s refusal of the Hinckley RFI

Under the section devoted to the retention in of the Hinckley Rail Freight Interchange option “..DCO...refused ..insufficient transport modelling....impacts at M1 J21 and M69 J3..highway safety impacts on village of Sapcote” Referring to current need and the retention of the Hinckley option I note the following “Proposals for solely road-based ..B8...would undermine the identified need for rail-based strategic B8 floorspace...” This seems to adopt an either/or approach rather than giving detailed attention to an analysis of why road based warehouses proliferate as a result of market demand along the M1 and other similar corridors with no guarantee that the benefits of rail are being realised and regardless of the capacity of the Highways network

“The piecemeal and premature approach to public sector control of Highways modelling that is built in to the application but still unresolved, having failed so far to integrate long term local and national need across three counties, or to involve local communities.”

My advisor writes: “Road access- if National Highways and the local Highways authorities in the three counties have not completed modelling and the costs are not understood, how is it possible to form a view on whether the site can be adequately accessed and the scheme is viable? If the scheme cannot cover the surface access costs then there needs to be a TEE appraisal, BCR assessment and full subsidy case to justify any third party public investment in enhance transport links. Moreover, if the justification for the site in does relate in part, or in whole, to the airport then it is established policy that the airport or its development partner pays in full

TEE (Transport Economic Efficiency) appraisal and BCR (Benefit-Cost Ratio) assessment are central components of transport business cases, primarily in the UK, designed to evaluate the value for money of transport projects. They are rooted in HM Treasury Green Book principles, ensuring projects are economically, socially, and environmentally sustainable. in this respect.