

East Midlands Gateway

Document Review – Landscape and Ecological
Management Plan (LEMP)

Rev	Date	Detail	Made By	Checked By	Approved By
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Gillespies

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1 Introduction

- 1.1 In March 2025, Gillespies were commissioned by North West Leicestershire District Council (NWLDC) to provide support for reviewing the documents submitted for statutory consultation with respect to an application for the development of East Midlands Gateway Phase 2. As the site will be subject of a Development Consent Order (DCO) under the 2008 Planning Act, NWLDC will not be the determining authority, reviews will be used to assist NWLDC to form a view to its position regarding the documents submitted.
- 1.2 In October 2025, the DCO was submitted to the Planning Inspectorate. In March 2026, the Examining Authority published its first written questions. Q12.0.3 requested NWLDC to consider the Landscape and Ecological Management Plan (LEMP) as follows:

Q12.0.3	The applicants North West Leicestershire District Council (NWLDC)	<p>Landscape and Ecological Management Plan (LEMP) [APP-117]</p> <p>NWLDC is asked to critically evaluate the LEMP and provide specific comments in relation to its drafting.</p> <p>Given the long-term nature of the LEMP could both the applicants and NWLDC comment as to whether should this include replanting regimes in relation to failed landscaping, and if so, what changes are proposed.</p> <p>In its Relevant Representation (RR) NWLDC [RR-003] states that the draft requirements provide for replacement planting for 5 years (requirement 10(4)) and requests this be increased (stating a minimum of 15 years), noting the importance of landscaping for screening and NWLDC's experience of establishing planting at EMG1.</p> <p>Please reconcile the heritage assessment's reference to effect reduction following landscape establishment over a 15-year period, including the use of "with 15 years growth" in the residual effects table in Environmental Statement (ES) chapter 12 [AS-051].</p> <p>Could the applicants and NWLDC please explain whether the LEMP (and / or the relevant draft Development Consent Order (dDCO) requirement(s)) should secure replacement planting and maintenance over a period consistent with the mitigation relied upon in the ES, and if so, what change is proposed.</p>
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- 1.3 The LEMP (APP-117) (Document DCO 6.9J/MCO 6.9J October 2025) was downloaded from the Planning Inspectorate website on 23rd March 2026 and the following reports on the finding of the review undertaken to respond to the Examining Authority questions above.

2 Critical Review of LEMP

Introduction

- 2.1 This section sets out the purpose of the LEMP, relevant legislation/policy and responsibilities.
- 2.2 The LEMP covers 30 years post construction.
- 2.3 It notes that although the EMG2 projects comprises three components (the EMG2 Works, Highway Works and EMG1 Works), the LEMP solely relates to the DCO Scheme which comprises the EMG2 Works and Highway Works. The EMG1 Works (MCO Scheme) were subject of its own DCO and a separate requirement for a phase specific LEMP.
- 2.4 The EMG2 Works comprises the EMG2 Main Site and the Community Park.
- 2.5 Table 1 sets out relevant legislation for Protected Species.
- 2.6 The responsibilities section sets out that SEGROs PM with support will be responsible during and immediately after the construction period and that delivery of the operational phase will be SEGRO/Principal Contractor, through the SEGRO management/stewardship body.

Comments

- 2.7 The components are set out on the Components Plan (DCO 2.7/MCO 2.7). This is useful as sets out the boundary between the EMG2 Main Site and the Community Park.
- 2.8 The responsibilities section could be more defined. In para 1.14 which covers the period 'during and immediately after the construction period' suggest this could state that this covers during constructions and the 1 year defects period.
- 2.9 Para 1.15 which discusses the operational phase could be more defined to state the years this covers e.g. year 2 to year 30.
- 2.10 Suggest that the operation phase should also list an ecologist as part of the team since the appointed contractor will also be responsible for the detection of GCN and invasive species (para 4.17) as is suggested in para 5.2.
- 2.11 Query over the responsibility of the country park post year 30. Is there an expectation that SEGRO (or any future site operator) will manage the site in perpetuity through a management body?

Ecological and Landscape Features

- 2.12 This section describes the main landscape and ecological features that are being retained through construction and operation with reference to the relevant ES chapter.

Comments

- 2.13 No comments

Future Management and Monitoring

2.14 This section states the management objectives:

- Objective 1 – Ensuring early establishment and links to other local green infrastructure networks
- Objective 2 – Provide net gain for biodiversity across the Proposed Development
- Objective 3 – Providing features of benefit to specific species or groups
- Objective 4 – Ensuring effectiveness of mitigation and enhancement

2.15 Para 3.2 discusses lighting with reference to Chapter 11 of the ES.

Comments

2.16 The question of lighting to the south and west of the Proposed Development has already been asked of the Applicant to ensure these facades are not lit. This will need to be secured as a commitment in the DCO to ensure when each plot comes forward for development that the framework is already in place. Future applications will be submitted to NWLDC and therefore there will be opportunity for the LPA to control this aspect.

2.17 Typo in 3.6 - rotes should be routes.

Management Prescriptions

2.18 This section sets out the detail for each of the proposed habitat types as well as the general structure of management.

2.19 Para 4.9 sets out that habitat creation would be phased and year 1 refers to the time after the habitat is created, not year 1 of the site works.

2.20 There is reference to Appendix A which provides example planting and grass seeding mix.

2.21 The section lists out establishment and on-going management for the flowing habitats:

- Bioswales/SUDS
- Grassland habitats
- Orchards
- Hedgerows
- Ponds
- Scrub
- Trees – Existing, Veteran and New Trees
- Watercourses
- Woodland
- Faunal enhancement

Comments

2.22 Appendix A should be updated once detailed design is complete. These planting schedules should be signed off by NWLDC as part of the final LEMP which should be a condition of the DCO.

- 2.23 The example schedules in Appendix A do not include some of the seed mixes or species listed in the LEMP. For example, the wet grassland mix in the bullets under 4.15 is not referenced, nor
- 2.24 Para 4.17 and 4.74 states that the appointed contractor will be responsible for detection of invasive species and GCN and implies that future checks should be made during the 30 year management period. Could be made more explicit e.g. that eDNA could be taken at regular interval during the 30 year management period. Advice on methods and timings could be sought from an ecological to provide a more defined scope.
- 2.25 Para 4.18 refers to SCO Scheme – Assuming this is a typo and should be DCO Scheme.
- 2.26 Para 4.19 contains some superfluous words – The words such and of could be removed.
- 2.27 Para 4.24 – Typo ‘flowing herbs’ should be flowering herbs.
- 2.28 In the bullets following para 4.35 under ongoing management – Glyphosate is not a contact herbicide, but should be described as a non-residual translocated herbicide, unless the author meant a contact herbicide. Suggest that ‘or similar approved’ added after Glyphosate.
- 2.29 There is no reference to replacement planting in the section on orchards. Suggest that a bullet is added as failure of trees within the orchard would be more noticeable than within larger areas of woodland. Suggest at a minimum for the first 5 years, but could consider including for 30 years to ensure the orchard is maintained throughout the lifetime of the LEMP.
- 2.30 Para 4.45 – Typo for guards.
- 2.31 Para 4.48 refers to bird strike safeguarding for East Midlands Airport. This is the first reference to this in the LEMP. Suggest that CAP 772 Wildlife Hazard Management at Aerodromes and any guidance specific to East Midlands Airport be referenced up front in the LEMP.
- 2.32 Para 4.54 refers to the annual cutting of common nettle. Common nettle can be good for butterflies. Ecologist to advise on whether leaving some areas of nettle uncut would be beneficial.
- 2.33 Para 4.64 – Typo, steeping should be stepping.
- 2.34 Under para 4.65, the sixth bullet refers to using chipped arising in amenity planting areas. If used in areas of planting, chippings should be composted. Suggest amending to ‘chipped and composted’.
- 2.35 Under para 4.71, typo in fifth bullet, well should be when
- 2.36 Under para 4.71, the sixth and seventh bullets discuss tree replacements. The two bullets cover similar things and could be combined to make a clearer more concise commitment on replacement and the timing and responsibilities.
- 2.37 A bullet could be added under the stream section to reference about use of herbicides near watercourses.
- 2.38 Para 4.78 – Add / between buffer and screen.
- 2.39 Para 4.79 – Third bullet change provided to provide.
- 2.40 Para 4.80 – Add s to clearing.
- 2.41 Under woodland planting the dormant season is stated as November to February. Suggest increasing this to March to allow for flexibility. Bare root stock rarely gets lifted in November and would mean a very short planting season. If plants are being lifted and are available in March then planting should be allowed.

- 2.42 Under woodland planting, the third bullet refers to c.30% open space. Suggest making sure that this doesn't include areas that are key for the screening of buildings e.g. on the tops of the bunds where leaving open space would result in less dense planting.
- 2.43 Under woodland establishment, the third bullet refers to strimming of weed growth, Strimming triggers regrowth which increase competition for trees. Suggest that within tree circles, weeds should be pulled with other areas strimmed.
- 2.44 The section on faunal enhancement should be reviewed by an ecologist.
- 2.45 Para 4.94 – Were some footnotes/references removed as some random numbering within the paragraph.
- 2.46 Para 4.99 – The method on p30 para 4.103 refers to topsoil. Include topsoiled after profiled.
- 2.47 Para 4.103 – Last sentence is a repeat of the previous.
- 2.48 Para 4.116 – Clarification on use of mulch for accessible cycle ways and pathways. Is mulch an appropriate finish for accessible paths?

Monitoring and Review Mechanism

- 2.49 This section sets out the monitoring of landscape and ecological features.

Comments

- 2.50 Suggest changing 'suitable qualified ecologist' to 'suitable qualified personnel including ecologist, landscape architect or arboriculturist as appropriate'. Or if this para is specific to ecology then add additional para on other personnel. An ecologist won't necessarily be qualified to look at tree works required.

Works Schedule

- 2.51 This section sets out a work schedule with frequency of operations/works for each habitat/feature.

Comments

- 2.52 Suggest planting season be extended to March as previously noted.
- 2.53 Suggest a second (autumn) window for creations of grasslands e.g. Sept/Oct sowing may be useful.

Appendix A: Example Planting Mixes

- 2.54 This appendix provides example planting mixes and refers to the BCA drawings for full species lists. Mixes include for woodland, hedgerow and grass seeding. No sizes are provided.

Comments

- 2.55 It is assumed that the reference to BCA drawings is reference to future drawings to be provided and that this appendix will be updated for the final LEMP, which would be approved by NWLDC as a condition. All mixes and sizes should be provided.
- 2.56 The example mixes provided do not include some of the specifics listed in the draft LEMP e.g. species mentioned in 4.108.

3 Summary

3.1 The following summarises the comments made above:

- Suggest that the documents should be called an Outline LEMP or Draft LEMP to make it clear this is not a final document and that more detailed information would be added during the detailed design stages.
- There should be a condition for NWLDC to sign off the final LEMP once more detailed information is available particularly in relation to final plant schedules, including species and sizes.
- Note that this document has been reviewed by a landscape architect, and although experienced in habitat creation, this document should also be reviewed by an ecologist and an arboriculturist in relation to the veteran tree strategy.
- Specific comments are listed out for each section and should be considered for future updates. This includes various typos that should be addressed in any subsequent revision.

3.2 In relation to the specific question from the ExA about increasing the period of replanting to 15 years, this is based on the previous experiences of the adjacent EMG1 site. Establishment of woodland planting on large bunds can be subject to high levels of failure due to compaction issues during construction and drainage issues where plants suffer dry conditions. It is not unreasonable to request that replacement planting continues if there are failures after year 5 if the failure result in the mitigation not fulfilling its purpose to screen views of the Proposed Development. It is suggested that a 15 year requirement for replacement planting could be limited to those areas deemed essential for screening e.g. so as not to include the entire community park area, and areas agreed with NWLDC and set out in the final LEMP.

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