

Document DCO 7.11 / MCO 7.11

# Applicants' Response to Local Impact Reports

APRIL 2026

The East Midlands Gateway Phase 2  
and Highway Order 202X and The East Midlands Gateway  
Rail Freight and Highway (Amendment) Order 202X

**The East Midlands Gateway Phase 2 and  
Highway Order 202X and The East Midlands  
Gateway Rail Freight and Highway (Amendment)  
Order 202X**

**APPLICANTS' RESPONSE TO LOCAL IMPACT  
REPORTS**

**(DOCUMENT DCO 7.11 / MCO 7.11)**

<b>Version</b>	<b>Date</b>	<b>Status of Version</b>
0	April 2026	Deadline 2

# CONTENTS

<b>Section</b>		<b>Page</b>
1.	Introduction	4
2.	Applicants' Response	5
<b>Appendices</b>		
1.	Response to Local Impact Report from North Leicestershire District Council	6
2.	Response to Local Impact Report from Leicestershire County Council	25

# 1 Introduction

- 1.1 This document relates to the applications for a second phase at East Midlands Gateway Logistics Park (EMG1), being an application for a Development Consent Order (DCO) made by SEGRO Properties Limited (DCO Applicant) and an application for a Material Change Order (MC) made by SEGRO (EMG) Limited (MCO Applicant). The DCO Applicant and the MCO Applicant are together the "Applicants".
- 1.2 This document has been prepared by the Applicants to set out their response to the Local Impact Reports submitted to the Examining Panel (ExP) at Deadline 1. This document is submitted at Deadline 2 of the Examination.

## **2 Applicants' Response**

- 2.1 The Applicants' response to the Local Impact Report submitted by North West Leicestershire District Council (NWLDC) is at Appendix 1 of this document.
- 2.2 The Applicants' response to the Local Impact Report submitted by Leicestershire County Council (LCC) is at Appendix 2 of this document.
- 2.3 Where possible and appropriate, the Applicants have summarised the key matters or issues raised in each Local Impact Report (LIR) rather than repeating the text in full so as to reduce the size of this response document. The Applicants have not therefore responded to every point made and the absence of a direct response should not be read as acceptance. Further, in the interests of efficiency, where the same or similar points are raised in multiple instances, the Applicants do not repeat the same response. Also, where the same point has been made in previous submissions, the Applicants refer to their previous responses, rather than repeating them again in this document.

## APPENDIX 1

### RESPONSE TO LOCAL IMPACT REPORT SUBMITTED BY NWLDC

No.	Summary of Matter	Applicants' Response
<b>Section 2.0: Site Description, Location and Constraints</b>		
2.1-2.7	Description of site and constraints for the EMG2 Site and MCO Site	The Applicants have no comments to make.
<b>Section 3.0: Project Description</b>		
3.1-3.12	Description of the EMG2 DCO and the MCO	The Applicants have no comments to make.
<b>Section 4.0: Planning History</b>		
4.1	Description of the planning history of the EMG2 Site	The Applicants concur with the planning history summary provided at Paragraph 4.1.
4.2	Description of the planning history of the MCO Site	The Applicants concur with the planning history summary provided at Paragraph 4.2.  As part of the Applicants' response to ExQ1-1.2.2 [REP1-054], details of all planning permissions for the EMG1 site and surrounding area have been provided at Annexure 1A to the Applicants' Response to Examining Panel's First Written Questions [REP1-054].
4.3	Other relevant applications relating to the DCO	The Applicants agree that the outline planning application for a residential development at 'Isley Woodhouse' is of relevance and this proposed development has been taken into account in the transport assessment and the consideration of cumulative impacts in the Environmental Statement.

4.4	Other relevant applications relating to the MCO	The Applicants note the summary of relevant development proposals in the vicinity of the MCO Scheme. The development proposals, where relevant, have been considered as part of the assessment of cumulative impacts in the Environmental Statement.
<b>Section 5.0: Key Local Planning Policy</b>		
5.1-5.46	Description of key policies contained in the North West Leicestershire Local Plan	<p>The Applicants have no comments on Section 5 of the LIR which lists the local planning policies NWLDC considers to be relevant. The Applicants have responded to NWLDC's assessment of compliance with those policies in section 9.0 of the LIR, and the Applicants' response is set out in the corresponding section 9.0 below (see internal page 20).</p> <p>The Applicants and NWLDC are preparing a draft Statement of Common Ground (SoCG) on planning policy matters. A draft SoCG was submitted at Deadline 1 [REP1-063] and an updated draft is expected to be submitted at Deadline 3.</p>
5.47-5.52	Description of key policies contained in the emerging North West Leicestershire Local Plan	The Applicants have no comments to make on this section of the LIR which sets out the current position with regard to the emerging Local Plan.
5.53-5.56	Description of key policies contained in the Leicestershire Minerals and Waste Local Plan	The Applicants have no comments to make on this section of the LIR which simply lists relevant policies.
5.57-5.75	Description of key policies contained in the Lockington and Hemington Neighbourhood Plan	The Applicants have no comments to make on this section of the LIR which simply lists relevant policies.
5.76-5.96	Description of key policies contained in the Long Whatton and Diseworth Neighbourhood Plan (LWDNP)	As noted in the LIR, the LWDNP is not a 'made' (final) plan. As such, it does not form part of 'the development plan'. The LWDNP has been subject to various consultation comments including unresolved objections. This includes objections from North West Leicestershire District Council, as well as the DCO Applicant who have objected to the neighbourhood plan as there is a conflict between policies contained in the draft LWDNP and the emerging Local Plan. This

		matter is covered within the SoCG between the Applicants and NWLDC on planning policy matters [REP1-063].
5.97-5.109	Description of Supplementary Planning Documents adopted by North West Leicestershire District Council including the Air Quality SPD, Good Design SPD and emerging Good Design SPD, Diseworth Village Design Statement, emerging East Midlands Freeport Strategic Infrastructure and Contributions SPD	The Applicants have no comments to make on this section of the LIR which simply lists NWLDCs supplementary planning documents.
<b>Section 6.0: Local Area Characteristics Designations and Landscape Character</b>		
6.1-6.19	Provides context for assessing likely residual landscape effects of the Proposed Development	<p>Section 6 is a short section of the LIR focused entirely on local landscape character and effects, and summarises the assessments in various evidence based documents of landscape character. It does not offer any commentary or view regarding the likely effects of the Proposed Development on landscape character.</p> <p>The Applicants note the Council's reference to the Landscape Sensitivity and Green Infrastructure Study for Leicester and Leicestershire (LSGIS) at Paragraph 6.4. The Applicants' would highlight that the LSGIS also includes an evaluation of the EMG2 Main Site and its immediate context for commercial development (large warehousing), concluding that this landscape is of 'moderate sensitivity' to this type of development due to the close proximity of major transport infrastructure including the M1 and EMA. The LSGIS offers a relatively more detailed and relevant assessment of the landscape to the east of Diseworth than the NWLLSS and NWLFLSS referenced at Paragraph 6.13.</p> <p>Section 6 helpfully cross-refers to the emerging SoCG between the Council and the Applicant on landscape issues [REP1-067].</p> <p>The Applicants note no major divergence of view in Section 7 of the LIR from the Applicants' own assessment of likely residual landscape and visual effects.</p>

<b>Section 7.0: Consideration of Local Impacts</b>		
<b>Air Quality</b>		
7.3-7.5	Provides relevant context to NWLDC's assessment of air quality impacts in the LIR	<p>The section helpfully cross-refers to the emerging SoCG between the Council and Applicants on air quality matters [REP1-064].</p> <p>The Applicants are continuing to work collaboratively with the Council in agreeing a SoCG on Air Quality. The current draft SoCG on Air Quality has been submitted as document DCO 8.3C/MCO 8.3C at Deadline 1 [REP1-064].</p>
7.6	Notes that NWLDC has assessed the air quality impacts for to human receptors with air quality impacts to ecological receptors to be addressed by LCC.	<p>The Applicants note the Council's focus is on air quality impacts on human receptors.</p> <p>The air quality impacts upon ecological receptors is not addressed by LCC but by Natural England's standing guidance for air quality impacts which has been followed and is commented upon in the SoCG between the Applicants and Natural England [REP1-078].</p>
7.7-7.10	Sets out the potential positive air quality impacts of the DCO and MCO schemes.	<p>The Applicants note the Council's assessment of the potential positive air quality impacts and agrees that the use of electric vehicles, implementation of the sustainable transport strategy and construction of sustainable buildings will result in positive impacts.</p> <p>Further comments on matters raised by Paragraph 7.9 and 7.10 are set out below.</p>
7.9	Use of non-road mobile machinery (NRMM)	The CEMP has been updated to clarify the use of NRMM. An updated CEMP has been submitted at Deadline 2 as document DCO 6.3A.
7.10	Sets out Council's position with regard to environmental targets.	It should be clarified that the Applicants are committed to delivering buildings that are highly energy efficient in operation. This will be achieved through wide ranging energy efficiency initiatives including targeting an Energy Performance Certificate (EPC) rating of Band 'A'

		<p>and a minimum of BREEAM 'Excellent' as part of SEGRO base build specification.</p> <p>This is made clear within Chapter 19 of the ES [AS-069] and is secured through Requirement 15 of the dDCO.</p> <p>References within the Planning Statement and Design approach Document to BREEAM 'Outstanding' are made with regard to that being a target, as opposed to the agreed minimum.</p>
7.11-7.20	Sets out the potential negative air quality impacts of the DCO and MCO schemes.	The Applicants note the Council's assessment of the potential negative air quality impacts. Further comments on matters raised by Paragraph 7.9 and 7.10 are set out above against those specific paragraphs.
7.13-7.19	Concerns PM2.5 targets	The Applicants response to ExQ1-4.0.9 [REP1-054] deals with this matter. It concludes that the Applicants consider the methodology for assessing PM2.5 impacts, as set out in Chapter 8 of the ES [AS-037], remains appropriate and the conclusions that the PM2.5 impacts are not significant remains sound in its reasoning.
7.20	Sets out the Council position with regard to air quality monitoring in relation to Castle Donington	As set out at Paragraph 8.2.110 of Chapter 8 of the ES [AS-037], traffic calming measures were introduced in 2024 in Castle Donington to try and redirect traffic to Castle Donington Relief Road. It is likely that these measures would have a positive impact on air quality in the Air Quality Management Area (AQMA).
<b>Built Heritage</b>		
7.21-7.25	Provides relevant context to NWLDC's assessment of built heritage impacts in the LIR	<p>The section helpfully cross-refers to the emerging SoCG between the Council and Applicant on built heritage matters [REP1-068].</p> <p>The Applicants are continuing to work collaboratively with the Council in agreeing a SoCG on Built Heritage. The current draft SoCG on Built Heritage has been submitted as document DCO 8.3G/MCO 8.3G [REP1-068] at Deadline 1 and an updated version is proposed to be submitted at Deadline 3.</p>

7.26-7.28	Sets out the potential negative built heritage impacts of the DCO.	The Applicants agree with the Council's summary on the agreement that has been reached between the parties, as set out in the draft SoCG submitted at Deadline 1 [REP1-068].
7.29-7.32	Impact on Church of St Michael and All Angels, Diseworth	As noted at Paragraph 7.32 of the LIR, it is agreed between the Applicants and the Council that the DCO Scheme will give rise to less than substantial harm to the asset's significance, which is likely to represent a medium level of less than substantial harm. This is not considered significant in Environmental Impact Assessment terms.
7.33-7.40	Impact on the Diseworth Conservation Area	As noted at Paragraph 7.28, it is agreed between the Applicants and the Council that the DCO Scheme will result in less than substantial harm on the asset's significance. However, discussions are ongoing in relation to the level of less than substantial harm, with the Applicants maintaining that the proposed development will give rise to a low level of less than substantial harm to the significance of the Conservation Area.
7.41-7.42	Impact on the Bulwarks Scheduled Monument, Breedon on the Hill	As noted at Paragraph 7.42 of the LIR, it is agreed between the Applicants and the Council that the DCO Scheme will give rise to low adverse harm before mitigation, reducing to negligible adverse (residual) harm with mitigation. This is not considered significant in Environmental Impact Assessment terms.
7.43-7.44	Impact on the Church of St Hardulph, Breedon on the Hill	As noted at Paragraph 7.44 of the LIR, it is agreed between the Applicants and the Council that the DCO Scheme will give rise to a negligible effect on the asset's significance. This is not considered significant in Environmental Impact Assessment terms.
7.45	Impact on Archaeological Remains	Archaeology matters are dealt with in a separate SoCG between the Applicants and Leicestershire County Council (LCC). A draft was submitted at Deadline 1 [REP1-071] and an updated draft is expected to be provided at Deadline 3.

7.46	Impact on Long Whatton Conservation Area	The Applicants have no comments to make in relation to the Council's assessment of the impact on the Long Whatton Conservation Area.
7.48-7.53	Sets out the built heritage and archaeology impacts of the MCO Scheme	<p>The section helpfully cross-refers to the emerging SoCG between the Council and Applicants on built heritage matters [REP1-068]. It is agreed between the Applicant and the Council that the MCO Scheme will give rise to less than substantial harm to the significance of the Church of St. Andrews, which is likely to represent a negligible level of less than substantial harm. No harm is anticipated to arise once the development is operational.</p> <p>It should also be noted that the Applicant has entered into SoCGs with both Historic England [REP1-079] and with LCC [REP1-071].</p>
<b><u>Energy and Climate Change</u></b>		
7.54-7.57	Provides relevant context to NWLDC's assessment of energy and climate change impacts in the LIR	The Applicants have no comments to make on this section of the LIR which simply provides context to the Council's assessment that follows.
7.58-7.74	Summary of potential positive, neutral and negative energy and climate change impacts	The Applicants note the Council's summary of the potential energy and climate change impacts which is based on the Applicants' assessment presented in Chapter 19 of the ES [AS-069] and associated appendices. The Applicants have no additional comments to make in response.
<b><u>Health and Wellbeing</u></b>		
7.75-7.94	Provides on overview of the health and wellbeing matters.	<p>The Applicants note that the Council defers to LCC for an assessment of population and human health matters as stated at Paragraph 7.80.</p> <p>The Applicants have advanced a SoCG with Leicestershire County Council (LCC) on population and human health matters [REP1-073].</p>

<b><u>Geology and Soils (specifically Land Contamination)</u></b>		
7.95-7.115	Summary of potential impacts arising from the development in terms of geology and soils	The Applicants note the Council's summary of the potential geology and soil impacts both during construction and operation which is based on the Applicant's assessment presented in Chapter 14 of the ES [AS-059] and associated appendices. The Applicants have no comments to make in response.
<b><u>Landscape and Visual</u></b>		
7.116-7.117	Provides relevant context to NWLDC's assessment of landscape and visual impacts in the LIR	This section helpfully cross-refers to the emerging SoCG between the Council and Applicants on landscape issues [REP1-067].
7.118	Summary of neutral landscape and visual impacts	The Applicants note the Council's agreement that there would be no significant landscape and visual impacts associated with the Highway Works.
7.119-7.124	Summary of landscape impacts of DCO Scheme	The Applicants have no comments to make as the summary of impacts reflects the Applicants' assessment set out at Chapter 10 of the ES [AS-041] and associated appendices.
7.125-7.134	Summary of visual impacts of MCO Scheme	The Applicants have no comments to make as the summary of impacts reflects the Applicants' assessment set out at Chapter 10 of the ES [AS-041] and associated appendices.
7.129	Night-time visual effects	As set out in the Applicants' response to ExQ1-12.0.7 [REP1-054], an updated Appendix 10F, including references to the nighttime visual effects where relevant, will be submitted at Deadline 3.
7.130	Lighting of building facades	Please see the Applicants' comments addressing these matters at Section 8 of the responses to the LIR below.

7.133-7.134	First Written Questions of the Exp	Please see Applicants' response to ExQ1-2.0.6 and EXQ1-19.0.6 [REP1-054].
7.135	Summary of landscape and visual impacts of the MCO Scheme	The Applicants note the Council's agreement that there would be no significant landscape and visual impacts associated with the MCO Scheme.
<b>Lighting</b>		
7.136-7.149	Provides relevant context to NWLDC's assessment of lighting impacts in the LIR and a review of potential impacts.	<p>This section helpfully cross-refers to the emerging SoCG between the Council and Applicants on lighting issues [REP1-065], which is largely agreed. An updated SoCG is expected to be provided at Deadline 3.</p> <p>The Applicants have no specific comments to make as the summary of impacts reflects the Applicants' assessment set out at Chapter 11 of the ES [AS-049] and associated appendices.</p>
<b>Lorry Parking</b>		
7.150-7.158	Sets out the Council's position with regard to the proposed lorry park.	<p>As set out in the Applicants response to the Relevant Representations submitted by NWLDC on this matter [REP1-051D], the lorry parking within EMG2 would be available to occupiers of EMG2 only. Therefore all HGV movements have been considered in the transport modelling which supports the application. The DCO Applicant can also clarify that each unit to be constructed on the EMG2 Main Site (and at Plot 16 on the EMG1 site) will be provided with a policy compliant number of HGV parking spaces. The proposed lorry park would be an overspill for occupiers of EMG2 including providing for early arrivals.</p> <p>The DCO Applicant has updated the Requirement in the draft DCO to secure delivery of the lorry park (including its amenity block) prior to first occupation of the EMG2 Main Site and to clarify that it shall be</p>

		<p>retained for the operational lifetime of the development. An updated draft DCO has been submitted at Deadline 2.</p> <p>The Applicants acknowledge that NWLDC has welcomed the inclusion of a lorry park and that NWLDC has also encouraged the Applicants to explore the wider use of the facility as a means to contribute to wider needs. However there is no policy requirement for this and a public facility is not being offered beyond what is set out within the Planning Statement at paragraph 5.1.73.</p> <p>For the avoidance of doubt the EMG2 highway works will retain the three existing lay-bys on the A453.</p>
<b>Noise and Vibration</b>		
7.159-7.161	Provides relevant context to NWLDC's assessment of noise and vibration impacts in the LIR	This section helpfully cross-refers to the emerging SoCG between the Council and Applicants on noise and vibration matters. A draft was submitted at Deadline 1 [REP1-066] which is substantially agreed and an updated draft is expected to be provided at Deadline 3.
7.162-7.173	Summary of noise and vibration impacts of DCO Scheme	The Applicants have no specific comments to make as the summary of impacts reflects the Applicants' assessment set out at Chapter 7 of the ES [AS-035] and associated appendices.
7.174-	Summary of noise and vibration impacts of MCO Scheme	The Applicants have no specific comments to make as the summary of impacts reflects the Applicants' assessment set out at Chapter 7 of the ES [AS-035] and associated appendices.
<b>Socio-Economic</b>		
7.180-7.189	Consideration of potential positive socio-economic impacts	The Applicants have no specific comments to make as the summary of impacts reflects the Applicants' assessment set out at Chapter 5 of the ES [AS-030] and associated appendices.

7.190-7.192	Consideration of potential negative socio-economic impacts	Please see the Applicants response to ExQ1-18.0.4 [REP1-054] for the Applicant's response to concerns over sectoral reliance and socio-economic resilience of North West Leicestershire.
7.193-7.196	Consideration of other negative socio-economic impacts	The Applicants do not agree that the construction phase of the development is likely to have a negative impact on the shopping centres in Castle Donington and Kegworth and facilities within Diseworth. As set out within Chapter 5 of the ES [AS-030], local businesses are likely to benefit to some extent from temporary increases in expenditure as a result of the direct and indirect (induced) employment effects of the construction phase, for example, as construction workers spend their wages in local shops, and other food & beverage or leisure facilities.
<b>Leicestershire County Council and Other Consultees</b>		
7.197-7.202	Highlights matters to be considered by LCC and other consultees which need to be satisfactorily resolved	Please see the Applicants' response to LCC's LIR below and the Applicants' response to LCC's Deadline 1 Written Representations (DCO 7.12) submitted at Deadline 1.
<b>Section 8.0: Consideration of Mitigation Measures</b>		
<b>Air quality</b>		
8.5-8.7	Dust management	The CEMP has been amended so that it includes all of the details set out in Table 8i 1 of Appendix 8I with further reference to that table. An updated CEMP has been submitted at Deadline 2.
8.12-8.23	PM2.5	The response to ExQ1-4.0.9 [REP1-054] deals with this matter. It concludes that the Applicant considers the methodology for assessing PM2.5 impacts, as set out in Chapter 8 of the ES, remains appropriate and the conclusions that the PM2.5 impacts are not significant remains sound in its reasoning.

8.24-8.25	Updates to air quality assessment	The DCO Applicant has engaged with NWLDC throughout the pre-application period and is continuing to work collaboratively with the Council in agreeing a SoCG on Air Quality. A draft SoCG was submitted at Deadline 1 [REP1-064].
<b>Community Park</b>		
8.32-8.35 and 8.42; 8.77-8.79; 8.99-8.100	Comments on Requirement relating to Community Park	The wording of Requirement 28 relating to the Community Park has been updated in response the Council's comments. An updated draft DCO has been submitted at Deadline 2.
<b>Building Sustainability</b>		
8.45-8.53 and 8.63	Comments on Requirement relating to Building Sustainability	<p>The Applicants are committed to delivering buildings that are highly energy efficient in operation.</p> <p>Chapter 19 of the ES [AS-069] and Requirement 15 are correct in that the Applicants have agreed to secure EPC rating of Band 'A' and BREEAM 'Excellent' as a Minimum as part of SEGRO base build specification. An update to the wording of Requirement 15 will be included in the updated draft DCO submitted at Deadline 2.</p> <p>It should be noted however that references within the Planning Statement and Design Approach Document to BREEAM 'Outstanding' and EPC Rating A+ are made with regard to that being a target, as opposed to the agreed minimum.</p> <p>SEGRO does not use LEED ratings.</p>
<b>Geology and Soils</b>		
8.70-8.73	Comments on Requirement dealing with Contamination Risk	NWLDC has requested the inclusion of a number of documents within Requirement 22. The Applicants acknowledge that these are all commonly used guidance documents on contaminated land. However,

		the Applicants do not agree that reference to these document needs to be embedded within the Requirement as the LCRM is already referenced. The EA LCRM Guidance is the primary, overarching risk based methodology for ground investigation, assessment and contaminated land management in the UK. Many of the proposed documents listed by NWLDC effectively sit alongside LCRM. Therefore, if all are expressly embedded into the requirement, then there is a risk of duplication and overlapping obligations which may result in complication and inconsistencies, particularly where there are guidance updates with the passage of time.
<b>Landscape and Ecological Management Plan (LEMP)</b>		
8.91-8.98	Comments on Requirement for Landscape and Ecological Management Plan	Amendments have been made to the wording of Requirement 10 in response the Council's comments. An updated draft DCO has been submitted at Deadline 2.
<b>Lighting Details</b>		
8.101-8.103; 8.113-8.115	Comments on Requirement for Lighting Details	Amendments have been made to the wording of Requirement 14 in response the Council's comments. An updated draft DCO has been submitted at Deadline 2.
<b>Construction Environmental Management Plan (CEMP)</b>		
8.116-8.118	Comments on Requirements dealing with CEMP	An amended CEMP (DCO 6.3A) has been submitted at Deadline 2.
<b>Lorry Parking</b>		
8.131	Comments on Requirement dealing with HGV Park	Amendments have been made to the wording of Requirement 29 in response the Council's comments. An updated draft DCO has been submitted at Deadline 2.

<b>Monitoring of Complaints</b>		
8.147-8.148	Request for inclusion of a complaints procedure	An updated draft DCO has been submitted at Deadline 2 which now includes Requirement 21(5) dealing with the monitoring of complaints.
<b>Employment</b>		
8.161-8.167	Comments on Requirement dealing with Employment Scheme	The Applicant has revised the wording of Requirement 25 in the draft DCO. The amended draft DCO has been submitted at Deadline 2.
<b>Advanced manufacturing floorspace</b>		
8.171-8.172	Request for Requirement to secure minimum of 20% of advanced manufacturing floorspace	The Applicants' response to ExQ1-1.2.8 [REP1-054] explained why the Applicants do not agree that it is appropriate for a Requirement necessitating a minimum of 20% of advanced manufacturing floorspace to be provided as part of the development.
<b>Design Approach Document (DAD)</b>		
8.179 to 8.185	These paragraphs commented on matters identified in the DAD encompassing: terms, landscaping in car parks, examples of projecting offices, colour study renamed warehouse colour study, bus interchange and Lorry park amenity building	The Applicants' response to NWLDC's relevant representation [REP1-051D] confirmed the DAD has been amended to address these concerns. An updated DAD has been submitted at Deadline 2.
8.186	DAD - wayfinding	The DAD has been amended to include additional details of the approach to wayfinding including a plan to identify places where people can meet and wayfind around the site. An updated DAD has been submitted at Deadline 2.
8.188 – 8.189	NWLDC Design Guide	The Applicants will review their position if the Design Guide is adopted.

Section 9.0: Compliance with Local Planning Policies		
9.3	NWLDC does not agree with the Applicant's conclusion regarding the quantum of future need [for additional industrial and warehousing employment land.	The Council's response to 1 <sup>st</sup> Written Questions 15.0.1 [REP1-204] summarises key figures based on the functional economic market area (FEMA) which formed the basis of the ICENI work. The ICENI report represents the evidence base on employment land for the emerging Local Plan. The figures quoted in that response to WQ 15.0.1 referring to the FEMA are noted and those attributed to the ICENI report are correct (expressed in sq.m.). NWLDC's Q15.0.1 response includes the following: <i>"The L&amp;L Study finds that there is a need for some 3.9 million sqm of additional strategic warehousing floorspace in the FEMA for the 22-year period between 2024 and 2046 (see Table 7.7, paragraph 7.37). This reduces to 3.06 million sqm once completions and commitments are taken into account."</i>
9.6	NWLDC does not consider that the Applicant's information demonstrates compliance with the immediate need/demand test of Policy Ec2(2).	The Applicants note that the Council's response to the Written Questions does not include reference to ICENI's proposed apportionment of floorspace by District (Table 7.8 of the ICENI report) which suggests that 1,554,700 sq.m. of additional floorspace (39% of the FEMA total) should be provided in NWLDC's area over the period 2024-2046). It also does not refer to the work undertaken by the Council to translate the ICENI assessment into a requirement covering the 18 years (2024-2042) of the proposed plan period for the emerging NWLDC Local Plan. The Officer Report taken to the NWLDC Local Plan Committee in November 2025 explained that the apportioned

need from the ICENI assessment suggests the following floorspace and land requirement over the 18 year emerging Local Plan period:

**Table B: NWL apportionment (2024-2042)**

Location	Floorspace	Land (estimate) <sup>1</sup>
M1 J23a/J24; A50 J1	728,673 sqm	209 ha
Bardon (J22)	93,109 sqm	27 ha
A/M42 J11,12,13	269,345 sqm	77 ha
<b>Total</b>	<b>1,091,127 sqm</b>	<b>313 ha</b>

(Source: 'New Local Plan – Strategic Warehousing' Report to NWLDC Local Plan Committee, Wednesday 19 November 2025').

The Council's references in its answer to WQ 15.0.1 to the Applicants' Assessment of need (by Savills [APP-223]) are only partially correct – the quoted 6,877,282 sq.m. figure for the FEMA forms the Savills baseline scenario, but the assessment explores a number of other scenarios. The Applicants' assessment estimates (at paragraph 7.5.7 of APP-223) need in the FEMA of between 4.1 million sqm and 2.7 million sqm over the 16-year plan period for strategic B8 uses. This equates to a land requirement of between 1,177 ha and 780 ha (based on a 35% plot ratio). For NWL over a 16-year period this translates to a land requirement of between 557 ha, 369 ha and 273 ha respectively for the scenarios considered, with the latter being the most conservative. Table 12.11 of the Savills Report [APP-223] sets out the assessment under the scenarios considered. However, when also considered pro-rata for the same 18 year emerging Local Plan period, this equates to demand estimates of 626 ha, 415 ha and 307 ha of B8 Strategic land. Therefore, the Applicants' lowest "minimum" assessment (307ha) compares favourably to (and is actually lower than) the assessment by ICENI for NWLDC of 313ha over the same period.

Leaving aside the fact these two assessments produced different absolute quantum of need, and were based on different study periods

		<p>(16 years and 22 years), it is clear both identify a very significant need for additional land and floorspace both at the FEMA and in North West Leicestershire. The Council has acknowledged that it cannot meet this need without additional sites being brought forward and that the proposed allocations in the emerging Local Plan are insufficient to meet this need in full.</p> <p>The Council's response to Written Question 1.2.1 [REP1-126] addresses points with regard to immediacy/urgency of 'need'. The ICENI work cited by NWLDC includes the following statement:</p> <p><i>"In reality, 2023/24 completions and existing commitments total 910,200 sq.m and will meet the need up to 2028. New identified locations will need to come forward to meet the need from 2028 onwards."</i> (ICENI October 2025, paragraph 0.14 of Exec Summary, and paragraph 5.11)</p> <p>The application of the concept of 'urgency' and immediacy in the context of planning for strategic sites requires some care and a recognition of the inevitable 'lag' between recognition of market need or demand, applications being made, decisions being taken, and the delivery of sites and buildings and the associated infrastructure (on- and/or off-site) required as part of strategic development sites. The EMG2 proposals first emerged in 2021/22, with the Secretary of State's Section 35 direction received in 2024, and the application for DCO/MCO made in 2025. A decision is not due until 2027, and delivery of first buildings not due until 2029. The Council's own evidence base identifies that 'new sites' are required to meet need from 2028 onwards. In that context, this is all about 'the future' as opposed to 'now' – but decisions are required now in order to be in a position to meet the identified needs in an efficient way and to deliver maximum</p>
--	--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

		<p>benefits in the context of the Freeport’s objectives and ‘benefits window’.</p> <p>The urgency of need /demand should also be considered in the context of the scale of overall need identified. It is common ground, by both ICENI and Savills, that the need in North West Leicestershire and that around the M1 J24 area, is very significant and will not be met by existing or proposed to be allocated sites. Whilst sites for strategic logistics are committed and available (as identified in the Council’s submissions), they meet only a very small portion of this identified need. In order for the need to be met in full (or in large part), progress on approvals of new sites, and subsequent delivery, must be made now.</p> <p>Furthermore, there would be no harm in doing so, as it would simply provide for choice and competition in the market to help meet the identified demand in the market.</p> <p>The ICENI report also identifies a proportion of the identified need as being ‘<i>rail-served need</i>’, and assumes this will be met at some point by the Hinckley SRFI proposal, plus via the EMG2 proposals (as an extension to EMG1). The ICENI report identifies “<i>no further rail served opportunities within the study area</i>” (ICENI, paragraph 0.24 of Exec Summary). Given the current status of the Hinckley SRFI scheme, the Applicants’ view is that the need for the additional rail-served floorspace proposed via EMG2 is current (now) and not being met by any other committed or emerging site. This adds to the extent that the application is not only appropriate now, but can and should be determined without delay.</p>
9.79.7 and 9.11, and 9.13	<p>Commentary regarding ‘the principle’ of the proposed development under current policies (adopted in 2017, and subject to partial reviews in 2018 and 2021), and under emerging new Local Plan policies.</p>	<p>Paragraphs 9.7 and 9.11 of the LIR identify a clear and important distinction between the LPAs view of the principle of the Proposed Development when considered under existing adopted Local Plan policies as compared to its view when considered in light of emerging new Local Plan policies. The LPA is clear that the emerging Local Plan</p>

		<p>proposes to allocate the EMG2 Main Site (local plan reference EMP90), and therefore that the principle of development is supported by the 'direction of travel' of the emerging new Local Plan, subject to consideration of detail regarding mitigation.</p> <p>Paragraph 9.13 similarly confirms that the LPA sees potential for the Proposed Development to satisfy other adopted Policies (S2, D1, D2, IF1, and En6), subject to appropriate mitigation being secured.</p> <p>Notwithstanding the Applicants' disagreement with the LPA's assessment of compliance with existing adopted policy Ec2(2) as set out above, this clarification regarding the degree of alignment between the proposals and the Council's emerging new planning strategy for the District is noted, and welcomed.</p>
--	--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

## APPENDIX 2

### RESPONSE TO LOCAL IMPACT REPORT SUBMITTED BY LCC

No.	Summary of Matter	Applicants' Response
<b>Planning Policy</b>		
5.1 – 5.3	<p><b>Relevant Planning History</b></p> <p>An EIA scoping application (22/00938/EAS) was submitted in May 2022 for the development of a logistics/industrial park (use class B2 and B8), with ancillary offices and associated parking, highway infrastructure and landscaping (EMG2).</p> <p>A DCO for EMG1 for the strategic rail freight interchange (SRFI) on land north of East Midlands Airport near Castle Donington, Leicestershire was granted in 2016. This proposal included:</p> <ul style="list-style-type: none"> <li>• Up to 547,414 sq metres of warehousing and service buildings served by railway</li> <li>• An intermodal freight terminal accommodating up to 16 trains per day, with trains up to 775 metres long and including container storage and HGV parking</li> <li>• A new rail line connecting the terminal to the Castle Donington Branch freight only line</li> <li>• New road infrastructure and works to the existing road infrastructure</li> </ul>	<p>The Applicants acknowledge LCC's summary of the planning history.</p>

	<ul style="list-style-type: none"> <li>• Demolition of existing structures and structural earthworks to create development plots and landscaped zones</li> <li>• Strategic landscaping and open space, including alterations to PRow and the creation of new publicly accessible open areas</li> <li>• Bus interchange</li> </ul> <p>The EMG2 main site is a draft employment site allocation in the Draft North West Leicestershire Local Plan 2020-2040: Proposed Housing and Employment Allocations for consultation (January 2024)<sup>1</sup>, site reference EMP90(part).</p>	
5.4 – 5.7	<p><b>National Planning Policy</b></p> <p>The National Policy Statement for National Networks 2014 (NPS) sets out the national need for, and Government’s policies to deliver the development of NSIPs on the national road and rail networks in England. The NPS provides planning guidance for promoters of NSIPs and provides the primary basis for the examination of the merits of proposals by the Examining Panel and for subsequent decision-taking by the Secretary of State for Transport. Paragraph 1.2 of the NPS states:</p> <p><i>‘The Secretary of State will use this NPS as the primary basis for making decisions on development applications for national networks nationally significant infrastructure projects in England’</i></p> <p>The Government has concluded ‘that at a strategic level there is a compelling need for development of the national networks and as an integrated system’ (NPS, paragraph 2.10) (emphasis added). The Government in referencing a ‘critical need to improve the national networks’, acknowledges ‘that improvements may also be required to address the impact of the national networks on quality of life and environmental factors’ (NPS, paragraph 2.2).</p>	<p>The Applicants observe that the National Networks National Policy Statement (NNNPS) was updated in 2024 and that is the correct version to consider the DCO and MCO Applications against. The Applicants address the NNNPS 2024 in section 4 of the Planning Statement [AS-018].</p> <p>The Applicants have also made separate representations regarding section 104 of the Planning Act 2008 and determination of the DCO Application and the MCO Application under the NNNPS. (See DCO 7.3 Applicants' Post Hearing Submissions [REP1-052] Agenda Item 3 at Section 4 ISH1 and DCO 7.4 Applicants' Response to Hearing Action Points [REP1-053] at Action Point 8).</p>

	<p>The Government's vision for transport is set out in the NPS (paragraph 2.53) stating:</p> <p><i>'The Government's vision for transport is for a low carbon sustainable transport system that is an engine for economic growth, but is also safer and improves the quality of life in our communities. The Government therefore believes it is important to facilitate the development of the intermodal rail freight industry. The transfer of freight from road to rail has an important part to play in a low carbon economy and in helping to address climate change.'</i></p> <p>National planning policy is also provided in the National Planning Policy Framework (NPPF) dated December 2024. The overall strategic aims of the NPPF and the NPS are consistent as statements of national planning policy but serve different roles. The NPPF provides policy guidance upon which local authorities can prepare development plans to bring forward developments and comprises a material planning consideration in decision-making on individual planning applications under the 1990 Act. The NPPF makes clear that it does not contain specific policies for NSIPs where quite particular considerations can apply (NPPF, paragraph 5).</p>	
5.8 – 2.10	<p><b>Freeport Designation</b></p> <p>In March 2022, the Government announced the designation of the East Midlands Freeport.</p> <p>The spatial extent of the East Midlands Freeport covers three complementary locations, the East Midlands Airport and Gateway Industrial Cluster (EMAGIC), Ratcliffe-on-Soar former Power Station site, and the East Midlands Intermodal Park (EMIP). The EMG2 main site and the EMG1 works both fall within the EMAGIC area and accordingly form part of the Freeport designation.</p> <p>Freeports are special areas within the UK's borders where different economic regulations apply. With Freeport status comes a comprehensive package of</p>	<p>The Applicants note LCC's submission and the detailed response regarding allocation of the Freeport submitted by the Ministry for Housing, Communities and Local Government at Deadline 1 [REP1-215D].</p>

	measures, comprising tax reliefs, customs, business rates retention, planning, regeneration, innovation and trade and investment support and incentives.	
<b>Recent Development Plan Policies</b>		
6.1 – 6.12	<p><b>Context</b></p> <p>Section 104(2) of the Planning Act 2008 states that in deciding an application the SoS must have regard to, inter alia, any LIR's. The Planning Inspectorate (PINS) Advice Note for the preparation of LIRs refers to the inclusion of relevant development plan policies, supplementary planning guidance, development briefs or approved masterplans. The LIR should also include the local authority's appraisal of the proposed development's compliance with local policy guidance.</p> <p><b>Development Plan</b></p> <p>The current development plan is the North West Leicestershire Local Plan which was adopted in 2017, and sets out the strategy for delivering homes, jobs and infrastructure in the district between 2011 and 2031. The Local Plan was subject to a partial review in February 2018 and adopted in March 2021.</p> <p>Consideration of the policies of the North West Leicestershire Local Plan can be found in the Local Impact Report prepared by North West Leicestershire District Council.</p> <p><b>Leicestershire Minerals and Waste Local Plan (2019)</b></p> <p>The County of Leicestershire is a principal source nationally of economically important minerals to meet infrastructure and commercial development needs. Igneous rock extraction (primarily granite) accounts for approximately 73% of the mineral extracted within the County. The Leicestershire Minerals and Waste Local Plan (September 2019) has a plan period to 2031 and seeks to provide sufficient minerals and waste facilities within Leicestershire to meet</p>	The Applicants note LCC's submission regarding the Leicestershire Minerals and Waste Local Plan (2019) and have responded separately (above) to the Local Impact Report prepared by North West Leicestershire District Council.

identified needs. It forms part of the statutory Development Plan for the County.

The Local Plan sets out the policies and proposals to guide the future winning and working of minerals and the form of waste management development over the period to 2031 and includes development management policies which set out criteria against which planning applications for minerals and waste development will be considered. It also contains a spatial vision and strategic objectives for sustainable minerals and waste development in Leicestershire which are delivered through these policies. Policies are divided into strategic policies by type of mineral or waste site and development management policies for specific issues.

The use of recycled and secondary aggregates in construction and infrastructure is encouraged, recognising this lessens the need for quarrying and the efficient use of a finite resource. Provision is made for:

- i. Sand and gravel: the extraction of 19.04 million tonnes (2015 to 2031), maintaining a landbank of at least 7 years with priority given to proposals for extraction as extensions to existing site operations (Policies M1, M2 and M3);
- ii. Crushed rock: the extraction of 231 million tonnes (2015 to 2031), maintaining a landbank of at least 10 years with priority given to proposals for extraction to be worked as extensions to existing rail-linked site operations, allowing proposals for new extraction sites where it has been demonstrated that the landbank and production capacity cannot be maintained from existing permitted sites (Policy M4).

Provision is also made for a steady and adequate supply of brickclay, fireclay and gypsum, with building and roofing stone being extracted where it can be demonstrated it would be primarily used in the conservation and repair of historic buildings. With policies also included to assess proposals for the extraction of coal and for the exploration of conventional and unconventional hydrocarbons (oil and gas).

	<p>To protect mineral resources of local and national importance Policy M11 sets out the safeguarding of mineral resources and Mineral Safeguarding Areas (MSA) are identified and are contained in Mineral and Waste Safeguarding documents produced for each Leicestershire district in 2015. Policy M12 on the safeguarding of existing mineral sites and associated minerals infrastructure seeks to ensure that significant infrastructure that supports the supply of minerals in the County will be safeguarded against development that would adversely affect operations at an existing mineral site and the use of associated mineral infrastructure by creating incompatible land uses nearby.</p> <p>Policy M14 sets out criteria to be met for planning permission to be granted for borrow pits to supply materials for major construction projects.</p> <p>With regards to waste the Local Plan seeks to deliver sufficient new waste management capacity equal to the waste arisings in Leicestershire to support the delivery of the Leicestershire Municipal Waste Management Strategy targets and to allow waste management in the County to move greater amounts of waste away from disposal and up the waste hierarchy.</p> <p>A suite of policies is included to meet this objective, which includes policies for strategic and non-strategic waste facilities, the biological treatment of waste, facilities for energy and value recovery from waste, and safeguarding waste management facilities.</p> <p>A review of the Local Plan was carried out during 2022 in the light of the Environment Act (November 2021), the Levelling Up and Regeneration Bill (LURB) and various local factors such as the delivery of the Newhurst Energy from Waste facility and low sand and gravel reserves. The review concluded that the Leicestershire Minerals and Waste Local Plan is performing well, including at appeal, and its implementation is delivering sustainable minerals and waste development.</p>	
<b>Consideration of Local Impacts – Highways and Transport</b>		
7.4 – 7.5	<b>Development Proposal</b>	To address LCC’s concerns, an assessment has been undertaken that assesses the perceived

	<p>The development proposal as submitted has a different quantum from that which had been tested within strategic transport assessment using the Pan Regional Transport Model (PRTM). The development proposals have evolved and increased the mezzanine offering by an additional 100,000sqm of floorspace.</p> <p>The full quantum of land use as applied for should be assessed as detailed in the PINS scoping response to the project. Rather than assess the full quantum of development applied for the Applicant has unconventionally proposed wording as a dDCO requirement to seek to limit the highway impact of the additional mezzanine floorspace pursued. Both LCC and North West Leicestershire District Council have raised concerns about the acceptability and enforceability of such a requirement.</p>	<p>missing 100,000sqm GFA of floorspace on the local road network. This confirms that, even if trip rates are applied to the total quantum of mezzanine floorspace at 100% of the rate for ground floor space as an absolute worst-case, there would be negligible additional impacts on the local road network and additional mitigation would not be required. This is presented in the PRTM 2023 report submitted at Deadline 1 (Document DCO 7.8) [REP1-058].</p> <p>The Applicants are aware that in response to the PRTM 2023 Sensitivity Test report, LCC have raised a concern with regard to Derby Road in Kegworth and the Applicants are liaising with LCC to resolve this matter.</p>
7.6 – 7.8	<p><b>Highway Works on the Local Road Network</b></p> <p>Access to the EMG2 main site will be provided via a new arm from the A453/Beverley Road roundabout. It should be noted that documents submitted by the Applicant incorrectly refer to this as “Hunter Road”.</p> <p>LCC in its capacity as Local Highway Authority (LHA) has reviewed the highway design proposals, including the site access arrangements from the A453, the proposed toucan crossing, active travel proposals, and the proposals for Finger Farm roundabout where they effect the LHA’s network. The LHA is generally content with the proposed designs subject to confirmation and outcomes of updated modelling as above.</p> <p>The proposals also include works to Hyam’s Lane PRoW through the EMG2 main site to provide a dedicated cycle link that will form part of an extension of the existing National Cycle Route 15. LCC has raised concerns over the mechanism to allow cycle access in conjunction with a PRoW to ensure no loss of the PRoW from the definitive map.</p>	<p>The Applicants are aware from LCC that the National Street Gazetteer refers to this road as Beverley Road. However, the road is privately maintained by MAG and MAG have referred to this as Hunter Road on some of their drawings within their Joint Application with Prologis. Unfortunately, there is no street name plate in situ on site to confirm the correct name. The Applicants suggest that if there is any doubt as to the name of this road that MAG are asked to formally confirm the name.</p> <p>The Applicants welcome LCC's confirmation that it is generally content with the proposed designs. The modelling information was originally provided to LCC on 02 March 2026 and has formally been submitted at Deadline 1 (Document DCO 7.8) [REP1-058]. There have been no design changes as a result of the PRTM 2023 modelling, which has confirmed that</p>

		<p>the design work completed using PRTM 2019 outputs is appropriate.</p> <p>The Applicants note that the definitive map maintained by LCC, which shows highway boundaries and Public Rights of Way, shows other Cycle Tracks (being a public highway with rights only for pedestrians and cyclists) as public highway. The Applicants consider the same approach should apply to Hyams Lane and the upgraded footpath L57.</p>
7.9 – 7.10	<p><b>Personal Injury Collision (PIC) data</b></p> <p>PIC records are presented in Technical Note EMG2-BWB-GEN-XX-RP-TR-0015_Highway Safety Position Statement, Revision P1 Appendix 14 to the TA in Appendix 6A [APP-080, APP-081, APP-082, APP-083].</p> <p>Having reviewed the PIC data the LHA does not consider there are any existing patterns of PICs within the scope of the assessment which would be exacerbated on the Leicestershire Local Road Network (LRN).</p>	<p>The Applicants note and welcome LCC's assessment.</p>
7.11 – 7.13	<p><b>Strategic Modelling</b></p> <p>The EMG2 project has used the East Midlands Freeport Model (EMFM) 2019 precovid model to test the impacts of development at a strategic level. LCC has requested that the impacts of development are tested in the PRTM 2023 post-covid model.</p> <p>The Applicant has committed to undertake a supplemental test of the development and infrastructure proposals in PRTM 2023 and to following up this assessment with cordoned input to the J24 VISSIM model for completeness. This approach will help to identify the full impact of the development on the LRN.</p>	<p>The PRTM 2023 Sensitivity Test modelling information was originally provided to LCC on 02 March 2026 and has formally been submitted at Deadline 1 (Document DCO 7.8) [REP1-058].</p> <p>There have been no design changes as a result of the PRTM 2023 modelling, which has confirmed that the design work completed using PRTM 2019 outputs is appropriate.</p>

	The LHA has flagged to the Applicant that there are risks associated with submission of a DCO application and fixing of an application boundary in advance of this work being undertaken.	
7.14 – 7.16	<p>The volumes of construction traffic that are used within the Transport Assessment [APP-080] quotes the EMFM Forecasting Report for the construction traffic scenario (July 2025) that, ‘the impact of construction traffic on the local road network is forecast to be minimal’.</p> <p>The LHA notes, however, that the assessment of materials and waste (as below) has not used the most up to date data metrics which could affect volumes and hence traffic movements on the LRN.</p> <p>The LHA also notes that consideration does not appear to have been given to the impact of construction of highway mitigation on either the strategic or local road networks. The LHA is concerned that such impacts could be significant and take place over a prolonged period.</p>	<p>An updated assessment of materials and waste has been undertaken using 2024 data and details were presented to LCC by email on 25 February 2026. An updated Chapter 18 of the ES (Materials and Waste) was submitted at Deadline 1 confirming that the 2024 data does not affect the previously provided traffic data. The Applicants' traffic consultants have offered to meet with LCC and remain willing to discuss this matter if LCC consider this would be helpful.</p> <p>The Applicants have considered the construction stage within the ES. The Construction Environmental Management Plan (CEMP) is used as the control mechanism to avoid unacceptable impacts. Highway works that restrict capacity will not be undertaken during the peak hours, and would have to be managed by road space bookings etc. Further, phase specific pCEMPs will be produced and approved by LCC and NH as appropriate prior to each phase of construction of the proposed highway mitigation, and require approval to traffic management measures amongst other matters.</p>
<b>Consideration of Local Impacts – Population and Human Health</b>		
7.17 to 7.21	<p>LCC records the policy background and the work the Applicants have completed in Chapter 17 of the ES (Population and Human Health) [AS-066] to assess the impacts of the EMG2 project on population and health matters.</p> <p>The Health Inequalities JSNA (2023)<sup>3</sup> provides context and evidence on current health inequality priorities within the County. It identifies current groups</p>	The Applicants have no comments to make on these paragraphs.

	at risk of facing health inequalities in Leicestershire, including (but not limited to): people with a disability, including people with a learning disability; people living in poverty/deprivation and Bangladeshi, Pakistani or Gypsy or Irish Traveller groups.	
7.22	A draft Population and Human Health Statement of Common Ground (SoCG) has been produced by the Applicant, and LCC has commented on this. The two main areas of concern that remain are the transport modelling assumptions that have been used to inform assessments are yet to be updated and agreed, and the agreement to remove the standalone Health Impact Assessment (HIA) appendix was conditional upon all of the HIA content being fully and transparently embedded within the ES Chapter 17 [APP-180].	A draft SoCG was submitted at Deadline 1 [REP1-073] and an updated is expected to be provided at Deadline 3. The Applicants will continue to work with LCC to discuss the outstanding matters.
7.23	The transport modelling assumptions were not complete or agreed at the time of the application submission, and more detail relating to this is set out above and in LCC's Written Representation. As a consequence, the assessment undertaken and reported on within the ES at Chapter 17 [APP-180] is not considered robust given the factors assessed including, severance and access, active travel, road safety, and traffic-related air quality and noise are all directly impacted by the amount of traffic that would be generated and the infrastructure and mitigation measures proposed.	The Applicants note that these comments are linked to transport modelling which has been provided to LCC and was submitted into the examination at Deadline 1, documents [REP1-056 to 059] refer.  Section 5 of the PRTM 2023 Sensitivity Test report [REP1-058] compared baseline traffic flows between PRTM 2019 and 2023. This confirmed that flows on the local road network surrounding EMG2 are lower in PRTM 2023. Therefore, the environmental assessments based on traffic data from PRTM 2019 are robust and represent a 'worst-case'.
7.24	Until this work is complete, the true impacts of the proposal in relation to population and human health cannot be determined.	Notwithstanding that the environmental assessments based on the traffic data from PRTM 2019 have been demonstrated to be robust, the Applicants will continue to work with LCC to discuss any outstanding matters.

<p>7.25 – 7.29</p>	<p><b>Community Park</b></p> <p>This topic is considered by Chapter 17 of the ES (Population and Human Health) [APP-180].</p> <p>On the basis that the existing site does not comprise any publicly accessible open space, LCC agree that there are likely human health benefits associated with providing opportunities for physical activity, leisure/play and recreation.</p> <p>The proposed community park is informal in nature, and the provision would be larger than the existing publicly accessible open spaces in Diseworth, while being conveniently located in the eastern extent of the village which would balance out the existing provision. It is proposed that the community park will also be available and open for use by the public before occupation of any of the authorised buildings on the EMG2 main site and will be available in perpetuity. LCC consider that this will support physical activity, leisure/play and recreation, for both the existing residents of Diseworth and future employees of the proposed development.</p> <p>The proposed PRoW to the A453 though the community park includes an uncontrolled crossing of the A453. LCC advises that the appropriateness of this crossing should be determined via an assessment based on Traffic Signs Manual Chapter 6 guidance, and a design subjected to a Road Safety Audit.</p> <p>The community park will include comprehensive and integrated landscaping which in part forms embedded mitigation to help minimise likely residual adverse impacts. No part of the community park contains any statutory landscape, ecological or heritage designations, and will result in beneficial effects on biodiversity.</p>	<p>The Applicants note LCC's comments in respect of the appropriateness and benefits of the Community Park.</p> <p>The detailed design of the uncontrolled crossing would be undertaken at the detailed design stage and the design reviewed and approved by LCC in accordance with the protective provisions.</p> <p>Given its purpose is to connect to the proposed Public Right of Way through the community park, the use of the crossing is expected to be very low and during daylight hours only as, even though the junction is lit, it links to a public footpath that is not lit. As such the Applicants consider the provision of an uncontrolled crossing to be appropriate and proportionate in these circumstances.</p> <p>Traffic Signs Manual Chapter 6 section 15.3 deals with uncontrolled crossings. The physical works are expected to consist of minor works to the existing islands to provide drop kerbs and tactile paving. The existing islands are a minimum of 2m wide which meets the 'preferable' refuge width set out at para 15.3.2, and well above the 1.2m absolute minimum.</p> <p>The Applicants confirm that the crossing was included within the Audit Brief for the Stage 1 Road Safety Audit and that no problems were identified as part of the Audit, which has been approved by LCC (Documents [REP1-056] and [REP1-057] refer).</p>
------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<b>Consideration of Local Impacts – Flood Risk</b>		
7.30 – 7.32	<p>This topic is considered by Chapter 13 of the ES (Surface Water and Flood Risk) [APP-141].</p> <p>LCC, in its statutory role as Lead Local Flood Authority, is satisfied that the works proposed are sufficient to mitigate any surface water run-off subject to minor amendments to the associated requirements in the dDCO.</p> <p>LCC has consistently raised concerns with the Applicant regarding the wording of requirements as reflected in [RR-002]. As currently drafted the wording only commits the Applicant to submitting details, and not implementation of works.</p>	<p>The Applicants note LCC's satisfaction with the mitigation proposals for surface water run-off.</p> <p>The Applicants have submitted an updated dDCO at Deadline 2 which addresses LCC's comments.</p>
<b>Consideration of Local Impacts – Economy</b>		
7.33 – 7.34	<p>This topic is considered by Chapter 5 of the ES (Socio-Economic) [APP-077].</p> <p>During the construction phase of the development, LCC agrees that the likely socioeconomic impacts will be associated with employment, local skills and training, impacts associated with the Gross Value Added (GVA), and businesses in the industrial and logistics sector. Table 5.7 of the ES [APP-077] notes that at 21.5% the East Midlands has a higher proportion of economically inactive residents than the national average. Excluding retirees, 14.4% of economically inactive residents stated being formerly employed in the manufacturing or transportation &amp; storage sector (42,623 people). This indicates that the EMG2 Project can contribute to reducing economic inactivity, whilst Figure 5.8 of the ES [APP-077] indicates that North West Leicestershire and the Functional Economic Market Area have been consistently supply-constrained since 2014 with a significant shortage of industrial and logistics floorspace.</p>	<p>The Applicants welcome confirmation that LCC agrees with the socio-economic impacts assessed in Chapter 5 of the ES [AS-030].</p>
7.35	<p>In addition, the ES [APP-077] compares average GVA per job per sector in construction, transport and storage sectors with the average across all sectors in the study area, the East Midlands, and England. This is analysed in Table</p>	<p>The Applicants welcome LCC's support for the direct and temporary beneficial effects arising from</p>

	5.10, with the average GVA per job in the study area and the region being below the national average across all three categories.	employment generated during the construction period, as set out in Chapter 5 of the ES [AS-030].
7.36	Table 5.29 of the ES [APP-077] predicts that a maximum of 420 Full-Time Equivalent (FTE) on-site jobs would be created per annum on average during the construction period of 4.25 years, with a peak of 440 FTE on-site jobs in 2028. As set out in Table 5.31 of the ES, once leakage, displacement and multiplier effects have been considered, this would equate to an average of 630 net additional construction jobs per annum for 4.25 years, or a peak of 660 FTE jobs in 2028. Over the duration of the construction period, this would amount to circa 2,680 on- and off-site jobs. The generation of employment during construction is supported by LCC as a direct and temporary beneficial effect over the short and medium term.	
7.37	In regard to the GVA during construction of the development, the ES [APP-077] refers to the potential for approximately £23m to be generated per annum over the 4.25- year construction phase, or £97.6m in total over the period including the highway works, EMG2 works and EMG1 works contributing £6m, £84m, and £7m respectively. £23m constitutes circa 17% of forecast average increase in construction sector GVA per annum in the study area during the construction phase. LCC consider these construction phase impacts to have a beneficial effect over the short and medium term on regional and national economic activity.	The Applicants welcome LCC's confirmation that the construction phase impacts will have a beneficial effect over the short and medium term on regional and national economic activity, as set out in Chapter 5 of the ES [AS-030].
7.38	LCC considers that, during operation, the development will result in clear benefits to the regional economy. Most importantly, as set out in Table 5.33 of the ES [APP-077], the potential for the development to generate up to 6,185 net additional jobs, including 4,000 on-site operational jobs directly contributing to the regional economy.	The Applicants welcome LCC's confirmation that the development will result in clear benefits to the regional economy reflecting the assessment in Chapter 5 of the ES [AS-030].
7.39	As identified above, this has the opportunity to directly reduce economic inactivity within the East Midlands, maximising employment opportunities for the 42,423 people formerly employed within the manufacturing or transportation & storage sector. Further, as set out in Paragraph 5.7.68 of the ES [APP-077], the development is conservatively estimated to generate	The Applicants welcome LCC's support for the positive economic impacts from the development including a reduction in economic inactivity and

	business rates of around £9.3m per annum and lead to an additional £148m per annum in GVA once the EMG2 project is operational, with the EMG2 works contributing circa £137 million and the EMG1 works a further £11 million. These positive impacts associated with the proposed development are supported by LCC.	substantial increase business rates as set out in Chapter 5 of the ES [AS-030].
7.40	The ES [APP-077] identifies that the proposed development will provide upskilling and reskilling opportunities for approximately 45% of the future EMG2 project workforce, enabling progression from elementary roles into operative and technical/professional roles. This is supported by a further 3% of the unemployed workforce who could directly benefit from targeted training. Overall, the ES indicates that the proposed development would not likely face a skills shortage in the study area across most occupation categories, meaning the local population will directly benefit from increased employment opportunities.	The Applicants note LCC's comments.
7.41	In terms of the market for the industrial and logistics sector, the ES [APP-077] identifies that the persistent shortfall of floorspace availability has driven rental growth more than double the rate of inflation since 2014. Demand for such floorspace is demonstrated by the rapid uptake at EMG1, where floorspace expected to last for ten years was fully occupied within four years.	
<b>Consideration of Local Impacts – Cultural Heritage</b>		
7.42 – 7.43	Chapter 12 of the ES (Cultural Heritage) [APP-133] sets out the work the Applicant has undertaken to assess the impacts of the EMG2 project on cultural heritage assets.  Consideration of the assessment of significance in determining the value of known and potential archaeology (e.g., prehistoric sites, Roman settlements) has been reviewed. The Applicant, in liaison with LCC, has undertaken a thorough and robust assessment of the archaeological issues. LCC are confident that a satisfactory programme of on-site archaeological mitigation	The Applicants note LCC's comments and satisfaction with the assessment of archaeological issues.

	will be achieved and can be secured by requirement to determine the value of known and potential archaeology.	
7.44	LCC considers that the Applicant has conducted sufficient desk-based assessment, geoarchaeological assessment, geophysical surveys and trial trenching. It is considered that all appropriate methods have been applied. Any constraint to the predetermination investigation of the application site has been due solely to its viability and practicality at this stage. In this instance appropriate provision has been agreed with the Applicant to form part of the post-determination archaeological mitigation strategy.	
7.45	Evaluating both direct impacts (physical destruction) and indirect impacts (changes to the setting of heritage assets) as part of the impact assessment has identified that adequate archaeological investigation has been conducted to address these concerns.	
<b>Consideration of Local Impacts – Ecology and Biodiversity</b>		
7.46 – 7.47	Chapter 9 of the ES (Ecology and Biodiversity) [APP-107] sets out the work the Applicant has undertaken to assess the impacts of the EMG2 project relating to ecology and biodiversity matters.  A draft Ecology SoCG has been produced by the Applicant, and LCC has made comments upon this. The main areas of concern that remain relate to the Biodiversity Net Gain, skylark, lighting, and veteran trees.	The Applicants have provided detailed responses to the Examining Authority on each of the topics identified by LCC in Appendix 5 of the Applicants' Response to the Examining Panel's First Written Questions [DCO 7.5; REP1-054], or in direct correspondence with the LCC ecology team. Specifically: veteran tree mitigation is addressed at Q5.0.1; skylark mitigation is addressed at Q5.0.3. Further information on BNG and lighting has been discussed with the LCC ecology team during meetings and provided through email correspondence.  The applicants' ecologists are continuing to engage with LCC through the SoCG process to resolve outstanding matters.

7.48	<p>Within Chapter 9 of the ES (Ecology and Biodiversity) [APP-107] it is acknowledged that there will be impacts on ecology and biodiversity as a result of the scheme, including negative air quality impacts on surrounding habitats, including Lount Meadows SSI and Oakley Wood SSSI.</p>	<p>Chapter 9 of the ES (Ecology and Biodiversity) [AS-039], and detailed responses to the Examining Authority on each of the topics identified by LCC in Appendix 5 of the Applicants' Response to the Examining Panel's First Written Questions [DCO 7.5; REP1-054], cover the potential air quality impacts.</p> <p>Detailed dispersion modelling was undertaken covering all four pollutant pathways as recommended by Natural England (annual mean NO<sub>x</sub>, annual mean NH<sub>3</sub>, total nitrogen deposition, and total acid deposition). The PC critical load/level 1% screening threshold was applied at each receptor, with exceedances advanced to qualitative ecological assessment. In-combination effects are addressed through a traffic model that explicitly incorporates cumulative/in-combination sites including Freeport and Local Plan development scenarios, consistent with JNCC guidance on road-based in-combination assessment. While modelling demonstrates PC values do exceed the basic 1% screening threshold, the exceedance of a threshold is not decisive in and of itself, nor does it suggest that damage is likely to occur or that the integrity of the site/feature would be significantly affected.</p> <p>Chapter 9 provides this qualitative ecological analysis receptor by receptor, assessing the spatial extent of any exceedance as a proportion of the identified receptor, considering existing pressures and condition, and drawing conclusions about likely ecological significance. As a result of the limited extent of effect, the lack of particularly sensitive features, such as lower plant assemblages, and, in most cases, their location adjacent to the strategic</p>
------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

		<p>road network (the overwhelmingly dominant emission source in these locations in any event), any effect arising from site construction or operation is not considered to materially affect site integrity.</p> <p>Due to the nature of the traffic data provided being from a strategic model, it is not possible to split out the growth attributed to “neighbouring plans or projects”, rather than growth attributed to “strategic factors or long range (external) trips” and therefore no assessment exclusively of local growth could be undertaken. It is however noted that all strategic, long range (external) trips have been considered in the relevant assessment, presenting a greater quantum of traffic on the M1 than that which is advocated by NE, which would exclude certain trips.</p> <p>Therefore, the overall concentrations of modelled pollutants at these sensitive sites could be exacerbated, presenting a worst-case scenario.</p> <p>Given the assessment indicates no mitigation is required, there is no specific mitigation required to be added to the commitments register.</p>
7.49	There will also be a negative impact on veteran trees as there will be a partial loss of this habitat that cannot be mitigated. LCC has requested further from the Applicant in relation to veteran trees.	The Forestry Commission has engaged fully with the Applicants on this matter and, as recorded in the Forestry Commission Statement of Common Ground [REP1-080], agrees that the assessment, retention, mitigation and management of trees and woodland is realistic, proportionate and ecologically appropriate given the site constraints and species condition. The Forestry Commission does not object to the loss of the veteran trees, subject to implementation of the proposed mitigation strategy as set out in the LEMP

		<p>[APP-118]. The Forestry Commission further agrees that under routine agricultural management, many of the qualifying ash trees would likely be lost within the next decade due to ash dieback and structural decline.</p>
7.50	<p>Skylarks and yellow wagtail will be impacted by the loss of arable habitat. The impact is proposed to be reduced through grassland management to provide alternative habitat and to support the carrying capacity of surrounding habitats. However, at the time of writing this report no details of the suitable breeding habitat provision have been provided.</p>	<p>The Applicants have provided a response to the Examining Authority covering farmland birds in Appendix 5 of the Applicants' Response to the Examining Panel's First Written Questions [REP1-054].</p> <p>The grasslands within the proposed Community Park have been designed to incorporate measures to provide and/or enhance the foraging resource for farmland birds and the siting of this intrinsic mitigation adjacent to areas of arable land out with the DCO Order Limits provides an easily commutable foraging area for adults and young birds post-fledging from the adjacent suitable nesting habitat, which may facilitate an uplift in carrying capacity and reduce any adverse impact on this species.</p> <p>The Applicants do not therefore consider it proportionate to seek to entirely mitigate any residual minor effect which is not considered significant in the context of paragraph 193a) of the NPPF. The requirement for direct off-site replacement skylark or yellow wagtail habitat in this case need not be required for decision makers to fulfil their legal duty under the Habitats and Species Regulations 2017 or Natural Environment and Rural Communities Act 2006 (NERC).</p>

7.51	There will be a loss of some species of invertebrates as there will be some loss of habitats that cannot be mitigated in their entirety.	<p>The invertebrate assessment is set out in Appendix 9E [APP-112] and Chapter 9 of the ES [AS-039]. The site is assessed as being of high local importance for invertebrates, based almost entirely on the saproxylic assemblage associated with wood-decay features in over-mature hedgerow trees. Open habitats, wetland habitats and hedgerows are of lower importance.</p> <p>Mitigation focuses on deadwood conservation and long-term habitat continuity, including translocation of large-diameter deadwood to designated areas within the green infrastructure network and veteranisation of retained trees. New woodland planting will provide long-term continuity of arboreal habitat.</p>
7.52	There will be an impact on protected species as a result of lighting, and LCC has requested a more sensitive lighting scheme which should mitigate the impact. The requirement for bat boxes has also been raised with the Applicant, and it has yet to be confirmed that bat boxes will be provided.	<p>The lighting design will be based on BCT Guidance Note GN08/23, as set out in Appendix 9C [APP-110] and Chapter 9 of the ES [AS-039]. Measures include LED luminaires with peak wavelengths above 550nm, warm white light sources at 2700 Kelvin or lower, directional luminaires to control spill, and avoidance of direct lighting of hedgerows and habitat creation areas. Dark corridors will be maintained around site boundaries to retain connectivity for light-sensitive species.</p> <p>A minimum of 50 bat boxes will be installed on retained trees within the green infrastructure network at an early stage of construction, as secured in the CEMP [AS-027D] and LEMP [APP-117]. A variety of box types will be provided for both crevice-dwelling and void-dwelling species, with installation details confirmed by the project ecologist.</p>

<b>Consideration of Local Impacts – Materials and Waste</b>		
7.53 – 7.54	<p>LCC advised the Applicant that the Environment Agency’s 2024 Waste Data Interrogator (WDI) (released 23rd September 2025) should have been used in the ES Chapter 18 assessment [APP-185].</p> <p>The Applicant should demonstrate to the Examination the impact of using the most up to date data, together with any other assessment reliant on this data, including construction traffic movements.</p>	<p>The Applicants submitted an updated version of ES Chapter 18 at Deadline 1 [REP1-029] which included use of the updated data released after preparation of the original chapter.</p>
7.55	<p>In addition, LCC has advised that there appears to have been a conflation of landfill and general capacity. The site inventory appears to show changes in capacity, and this requires clarification.</p>	
<b>Planning Obligations</b>		
8.1	<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>	<p>The Applicants have provided details of funding for the EMG2 Sustainable Transport Strategy (STS) and successful operation of the Sustainable Transport Working Group (STWG) by reference to the successful delivery of the sustainable transport strategy at EMG1. Please see Item 7 of ISH1 in the Applicants' Post Hearing Submissions [REP1-052] and Action Points 23 and 24 at Appendices 5 and 6 to the Applicants' Response to Hearing Action Points [REP1-053]. Requirement 4 (sustainable transport) of the dDCO [PDA-004D] secures the establishment of the STWG and delivery of the STS so that a development consent obligation (s106 agreement) is not expected to be required.</p> <p>In summary, the DCO Applicant will fund and establish the STWG and fund a professional coordinator to manage and administer the STS. The STWG holds regular meetings to monitor compliance</p>

		with the STS and to approve any additional measures that may need to be deployed from time to time to enhance and achieve the sustainable travel objectives. Members of the STWG, which will include LCC, democratically discuss and vote on any additional measures which may be required.
<b>Summary</b>		
9.1	This LIR sets out the impacts of the submitted DCO and MCO by SEGRO Properties Ltd.	The Applicants note the comments and are in discussions with LCC with a view to resolving / addressing their concerns.
9.2	This LIR has been completed in accordance with the requirements of the Planning Act 2008 as amended by the Localism Act 2011. The LIR also considers the advice set out in the Planning Inspectorate (PINS) Advice Note One: Local Impact Reports (Version 2: April 2012).	
9.3	Overall, the impacts and mitigation measures of the proposal as identified in the submitted ES Chapters and supporting documentation have been reviewed and considered by LCC. There remain a range of outstanding issues that are of concern to LCC which need to be addressed by the Applicant.	