

# East Midlands Gateway Phase 2 (EMG2)

Document DCO 6.20B/MCO 6.20B

ENVIRONMENTAL STATEMENT

Technical Appendices

Appendix 20B

# ES Risk Record

April 2026

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

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

**APPENDIX 20B – ES RISK RECORD  
(DOCUMENT DCO 6.20B/MCO 6.20B)**

<b>Version</b>	<b>Date</b>	<b>Status of Version</b>
0	October 2025	Submission
1	April 2026	Deadline 3

Table 1 Risk Record for Screening MAD Events

Risk Record Entry Number	MAD Category Risk	Event Type	Hazard Description Applicable Phases (Construction, Operation, Maintenance)	Risk Description (and identifies whether the MA&D event is from an external or internal influencing factor)	Hazard sources and/or pathways	Documentation in which the event is/will be addressed	Reasonable worst consequence if event did occur and receptor(s)	Mitigation	Could this constitute a major accident or disaster?	Is this ALARP with existing mitigation?
1	Natural Meteorological	Extreme temperatures: Heatwaves, Low (sub-zero) temperatures and heavy snow	Vulnerability to extreme temperatures. Operational risk.	The <b>EMG2 Works, Highway Works</b> and <b>EMG1 Works</b> may be vulnerable to extreme temperatures. However, the <b>EMG2 Works, Highway Works</b> and <b>EMG1 Works</b> are not expected to increase or change risks associated with extreme weather.  External influencing factor: <b>EMG</b> is vulnerable to events originating at facilities or conditions beyond the Applicant's control.	Severe weather	Operational design standards	Damage to proposed <b>EMG2 Works, Highway Works</b> and <b>EMG1 Works</b> and loss of life	The following will be included within the management of the <b>EMG2 Works</b> and <b>Highways Works</b> through the requirements in the DCO to ensure a high quality environment is maintained throughout operation: <ul style="list-style-type: none"> <li>• Ensure effective, essential winter maintenance;</li> <li>• Regularly reviewed and updated winter maintenance plans;</li> <li>• Regular maintenance of assets to detect deterioration and damage;</li> <li>• Use of construction materials with superior properties which offer increased tolerance to fluctuating temperatures;</li> <li>• Road user warning systems in place in areas exposed to high winds;</li> <li>• Regular maintenance and</li> </ul>	Following this mitigation, the <b>EMG2 Works, Highway Works</b> and <b>EMG1 Works</b> are not considered as vulnerable severe weather or climate change.  <b>Chapter 19: Energy and Climate Change</b> concludes that: <ul style="list-style-type: none"> <li>• Negligible change in precipitation is predicted annually. However, seasonal precipitation trends are predicted to become more intense – decreased precipitation is predicted for the driest season (Spring), and increased precipitation is predicted for the wettest season (Autumn). Additionally, wetter winters and drier summers are projected for the proposed development.</li> <li>• Annual temperatures are anticipated to</li> </ul>	Yes

								cleaning of drainage systems.  The <b>EMG1 Works</b> will be completed and managed under the existing site management protocols.	increase, both during the coldest and hottest seasons and months. Maximum and minimum temperatures across the year are also both anticipated to increase.  <ul style="list-style-type: none"> <li>Humidity is anticipated to increase across the year, both during the winter and the summer.</li> <li>No clear trend for change in wind speed during this time period is shown in the regional projections data. Probabilistic projections do not provide wind speed data.</li> </ul> <p>Therefore, the risk of potential significant effects is negligible.</p>	
2	Technological or Manmade  Aerodrome safeguarding	East Midlands Airport	The <b>EMG2 Works, Highway Works</b> and <b>EMG1 Works</b> are located adjacent to East Midlands Airport.  Operational risk.	This entry considers risk in two directions:  (i) External influencing factor: the <b>EMG2 Works, Highway Works</b> and <b>EMG1 Works</b> may be vulnerable to accidents originating at East Midlands Airport (e.g. aircraft incidents on or in the vicinity of the runway)	(i) Locality of the EMG2 Project to East Midlands Airport; accidents originating at the airport could affect the EMG2 Project and its receptors.  (ii) Physical characteristics of the EMG2	In respect of direction (i): the EMG2 Project does not alter the likelihood of an aircraft incident at East Midlands Airport. The design and operation of the EMG2 Project will be in accordance with the embedded mitigation measures identified in this Risk Record.	(i): Damage to proposed <b>EMG2 Works, Highway Works</b> and <b>EMG1 Works</b> and loss of life;  (ii) Aircraft accident resulting from interference with airport operations, with	The East Midlands Airport operates under strict operational health and safety criteria.  The strategy notes that all illumination levels will be set as low as practicable while complying with safety and security recommendations and the design levels set out in BS EN 12464 'Light and lighting – Lighting of work	The operational risk of accidents associated with the East Midlands Airport are considered to be ALARP. Similarly, the risk of the EMG2 Project affecting airport operations has been assessed in Appendix 20C and found to be acceptable. With commitments MAD1–MAD5 and the Protective	Yes

				<p>(ii) Internal influencing factor: the physical characteristics of the EMG2 Project, including, lighting, glint and glare from building materials and glazing, could affect the safe operation of East Midlands Airport, with significant adverse effects on receptors beyond the EMG2 Project boundary.</p>	<p>Project as a pathway by which the EMG2 Project could affect airport operations and consequently air safety.</p>	<p>In respect of direction (ii): the potential for the EMG2 Project to affect airport operations has been assessed in Appendix 20C: Aerodrome Safeguarding Report (<b>Document DCO 6.20C</b>), which demonstrates that the proposed development has been designed with full regard to aerodrome safeguarding standards. Mitigation is further secured through commitments <b>MAD1–MAD5</b> in the Commitment Register (<b>Document DCO 5.8/MCO 5.8</b>) and the Protective Provisions in Part 6 of Schedule 13 of the draft DCO (<b>Document DCO 3.1</b>).</p>	<p>potential loss of life and significant adverse effects on receptors beyond the EMG2 Project boundary.</p>	<p>places – Part 2: Outdoor work places' and BS 5489-1 'Design of road lighting-Lighting of roads and public amenity areas'. It confirms that an indicative external lighting design has been produced that minimises light pollution.</p> <p>Furthermore, lighting for the operational phase of the EMG2 Project will be typical of commercial uses and highways lighting. This lighting is not similar to that of an airport or runway. Additionally, the lighting for the operational phase will not use the same colours in the same arrangement as that for the East Midlands Airport Runway and will not produce enough upward light to result in glare to pilots or planes. These measures will prevent pilots from being distracted by the operational lighting, and it will remain clear where the runway for the East Midlands Airport is.</p> <p>In addition it is noted in the Design Approach Document [APP-220] that the design would include significant glazing as part of a design requirement for distinctive buildings. However, the design also considers the limitation of glare in daylight hours and in the hours of darkness.</p>	<p>Provisions in place, the risk is ALARP.</p>	
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								EMG does not introduce features or structures that are particularly unusual in the context of the range of obstacles typically present in the vicinity of airports. Good practice design measures will prevent pilots from being distracted by the operational lighting. Modern flight systems rely extensively on instrumentation which is not affected by glint or glare. Using instrumentation alongside their faculties it is considered that pilots will be able to continue to determine the location of the East Midlands Airport runway and take off and land safely.		
3	Technological or Manmade  Rail freight	<b>EMG1</b>	<b>EMG1 Works</b> comprise additional warehousing development on Plot 16 together with works to increase the permitted height of the cranes at the EMG1 rail-freight terminal, improvements to the public transport interchange, site management building and the EMG1 access works.  The <b>EMG2 Works</b> includes elements of land within parts of the original EMG1 site including service areas for the rail freight terminal itself.  Operational risk.	External influencing factor: The <b>EMG1 Works</b> and <b>EMG2 Works</b> may be vulnerable to accidents at the rail freight terminal.	Locality of accidents	Operational design standards	Damage to proposed <b>EMG1 Works</b> and <b>EMG2 Works</b> and loss of life	The <b>EMG1 Works</b> and <b>EMG2 Works</b> includes rail infrastructure which is connected to Network Rail assets which are under strict regulation to prevent accidents.  The <b>EMG1 Works</b> will be completed and managed under the existing site management protocols.	Following mitigation, the risk of rail freight accidents associated with the <b>EMG1 Works</b> and <b>EMG2 Works</b> is considered to be ALARP.	Yes

4	Technological or Manmade  Industrial and Urban Accidents	Major Accident Hazard sites	The <b>EMG2 Works, Highway Works</b> and <b>EMG1 Works</b> are located within the consultation zones for Major Hazard Site H4798; known as Gasrec Ltd, Zone B East Midlands Gateway, DE74 2DL. This site comes under planning hazardous substance consent.  Operational risk.	External influencing factor: The <b>EMG2 Works, Highway Works</b> and <b>EMG1 Works</b> are vulnerable to accidents associated with the Major Hazard Site H4798. An accident at the site could result in a domino effect on the EMG2 Project and its receptors. Note also that the increase in HGV movements generated by the EMG2 Project in proximity to the Major Hazard Site H4798 is addressed under Entries 6 and 7 of this Risk Record.	Management of hazardous substances.	Gasrec health and safety protocols. Hazardous substance consent for which HSE is a statutory consultee on applications. HSE advise the HSA on whether consent should be granted. HSE advice aims to mitigate the effects of a major accident.	Damage to nearby buildings and the <b>EMG2 Works, Highway Works</b> and <b>EMG1 Works</b> . Loss of life.	Gasrec has a Remote Monitoring Centre which allows real-time monitoring of Gasrec's refuelling stations and gas supply chain, identifying potential safety issues early. This proactive approach minimizes risks like gas leaks or equipment failures, ensuring higher safety standards across all sites.  The Remote Monitoring Centre tracks refuelling station performance 24/7, identifying maintenance needs before they affect station performance. This predictive maintenance reduces unplanned disruptions and ensures refuelling stations are always operational for our customers.	Gasrec has appropriate monitoring in place and has statutory requirements under the approved hazardous substances consent.  Therefore, the risk of major accidents is considered ALARP.	Yes
5	Technological or Manmade  Industrial and Urban Accidents	East Midlands Freeport	As part of the cumulative assessment, three developments within the Freeport have been considered: <ul style="list-style-type: none"> <li>• SEGRO's Logistics Park East Midlands Gateway (EMG1)</li> <li>• Redevelopment of the Ratcliffe-on-Soar Power Station site</li> <li>• East Midlands Intermodal Park (EMIP) near Derby.</li> </ul> Operational risk.	External influencing factor: Whilst the <b>EMG2 Works, Highway Works</b> and <b>EMG1 Works</b> is vulnerable to accidents associated with the projects an accident at either the project's or <b>EMG2 Works, Highway Works</b> and <b>EMG1 Works</b> could result in a domino effect.  The <b>EMG2 Works, Highway Works</b> and <b>EMG1 Works</b> are all located within proximity of these facilities.	Third party developments	n/a	Damage to proposed <b>EMG2 Works, Highway Works</b> and <b>EMG1 Works</b> and loss of life	All committed developments nearby will be subject to health and safety requirements, to ensure that the risk of accidents is ALARP.	There are predicted to be no cumulative effects with other active or committed development with regards to MAD.	Yes

6	Technological or Manmade  Transport accidents	Road accidents	HGV movements in construction	Internal influencing factor: During construction there will be an increase in heavy construction plant and equipment on local road network which may increase the risk of accidents. It is not envisaged that the construction of the <b>EMG2 Works, Highway Works</b> and <b>EMG1 Works</b> would generate or attract any hazardous loads.	HGV	CTMP	Road traffic accidents resulting in loss of life.	The CTMP <b>[Document 3A]</b> sets out the arrangements and management practices that will be adopted to minimise the impact of traffic on the local road network.  <b>Chapter 6: Traffic and Transportation</b> provides a full assessment on the strategic and local highway network within the vicinity of the EMG2 Main Site and the accessibility of the EMG2 Main Site for road-based movements.  Although a CTMP will not be in place for the MCO Application, best practice will be applied to ensure the risk of road accidents is considered to be ALARP.	Following this mitigation, the risk of road accidents associated with the <b>EMG2 Works, Highway Works</b> and <b>EMG1 Works</b> is considered to be ALARP.	Yes
7	Technological or Manmade  Transport accidents	Road accidents	Operational HGV movements.	Internal influencing factor: The <b>EMG2 Works</b> involves the operational use of HGVs throughout the Strategic Road Network. An increase of HGVs on the road network could lead to transport accidents on the local road network.	HGV	<b>EMG2 Works</b> and <b>Highway Works</b> design.  Sustainable Transport Strategy	Road traffic accidents resulting in loss of life.	A secure, dedicated, HGV parking area (of approximately 95 spaces) to meet the needs of HGVs visiting the EMG2 Main Site.  A central part of the Sustainable Transport Strategy for the EMG2 Main Site will be a Gateway Shuttle Bus service. This will be a free service for all site employees providing a highly sustainable and affordable alternative to single occupancy car travel. It will operate by	Following this mitigation, the risk of road accidents associated with the <b>EMG2 Works</b> and <b>Highway Works</b> is considered to be ALARP	Yes

							<p>providing a 'last mile' service for employees with links from their workplaces to existing local bus operator services through a dedicated on-site interchange at the site entrance. Using state of the art fully electric shuttle buses, patronage at EMG1 has to date far exceeded expectations, with some 4,800 trips per week achieved in 2023. The EMG2 shuttle service will be co-ordinated through an expanded Transport Working Group already in operation at EMG1. This ensures that through close cooperation between all parties, bus services operate throughout the day to support the shift patterns of the businesses.</p> <p>Full details of the Sustainable Transport Strategy and Framework Travel Plan for EMG2 are provided in <b>Appendix 6B and Appendix 6C (Document DCO 6.6B and DCO 6.6C)</b>.</p>		
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