PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

APPLICATION BY SEGRO PROPERTIES LIMITED FOR THE EAST MIDLANDS GATEWAY PHASE 2 AND HIGHWAY ORDER 202X

Deadline 3 Submission

ON BEHALF OF

EAST MIDLANDS INTERNATIONAL AIRPORT LIMITED

EAST MIDLANDS AIRPORT PROPERTY INVESTMENTS (INDUSTRIAL) LIMITED

Interested Party References: [redacted]

1. INTRODUCTION

1.1 This is East Midlands International Airport Limited's ("**EMA**") ("**the Airport**", as appropriate) and East Midlands Airport Property Investment (Industrial) Limited's ("**EMIAL**") Deadline 3 submission provided in respect of SEGRO Properties Limited's ("**SEGRO**") application for a Development Consent Order ("**DCO**") for the East Midlands Gateway Phase 2 ("**EMG2**") ("**the DCO Application**").

1.2 This document seeks to address the Deadline 1 documents submitted by SEGRO (and other parties) relating to compulsory acquisition, traffic and transport, and socio-economic issues, which were reserved for Deadline 3 (28 April 2026) in accordance with the Rule 8 Letter dated 18 March 2026.

1.3 Terms used in this submission have the same definition as set out in EMA and EMIAL's Written Representation dated 7 April 2026 unless otherwise defined.

1.4 In view of the brevity of the substance of this document, a summary has not been provided.

2. ALIGNMENT WITH PROLOGIS

2.1 EMA and EMIAL support the case being made to the Examination by Prologis UK Limited and Prologis UK 121 Limited (together, "**Prologis**") in relation to land north of Hyams Lane which is the subject of the Joint Application.

2.2 EMA and EMIAL:

2.2.1 have had sight of the document to be submitted by Prologis at Deadline 3;

2.2.2 agree with and endorse the contents of that document; and

2.2.3 reserve the right to speak to and expand upon the matters raised in it in further written submissions or during hearings.

2.3 Specifically, EMA and EMIAL endorse Prologis' submissions on:

2.3.1 Compulsory acquisition and viability;

2.3.2 Traffic and transport; and

2.3.3 Socio-economics

2.4 In light of the fact that EMA and EMIAL's position is on all fours with Prologis, EMA and EMIAL do not propose to repeat points made by Prologis at Deadline 3. Rather, as set out above, EMA and EMIAL endorses and adopts those submissions.

3. MATTERS ADDRESSED

3.1 This document primarily focusses on matters relating to traffic and transport. It should be read in conjunction with the report written by SCP provided at **Appendix 1** entitled "Technical Note 04".

3.2 This document also provides a response to the Applicant's comments on EMA and EMIAL's Relevant Representation. That response can be found at **Appendix 2**.

3.3 Finally, this document provides an update on mapping discrepancies relating to the Active Travel Link which we raised previously.

4. THE IMPORTANCE OF SURFACE ACCESS TO EAST MIDLANDS AIRPORT

4.1 The Airport and the SRN

4.2 EMA is located with direct access to the Strategic Road Network, particularly the M1, A453, A42 and A50. EMA has no rail link and is dependent on the road network for 100% of its access

4.3 EMA is reliant on a small number of key road junctions for access for staff and customers, including:

4.3.1 Junction 24 of the M1;

4.3.2 A453 Finger Farm Roundabout;

4.3.3 A453/EMA Roundabout (the airport's "front door); and

4.3.4 A453/Beverley Road Roundabout (access to EMA Cargo East and for buses);

4.3.5 The junction of Green Lane with the A453.

EMA needs to be able to understand the impacts of the Proposed Development on those junctions and be satisfied that those impacts will be appropriately mitigated. As matters stand, the Applicant has not made the relevant information available for EMA to do that.

4.4 Combining the cargo operation with its regional airport passenger operation, the Airport requires 24-hour, 7-days a week, 365-days-a-year road access by road that is safe, efficient and reliable. The Airport is critical national infrastructure that is dependent on the SRN and local highways network and given the nature of EMA's cargo function, weighted towards evening and nighttime cargo operations, it makes the airport's access needs different from most other airports across the UK.

4.5 Cargo

4.6 East Midlands Airport is the largest dedicated freight airport in the UK.

4.7 EMA handles some 400,000 tonnes of cargo each year and is forecast to rise (where not all growth is directly dependent on additional facilities). DHL currently dominates EMA's cargo traffic, contributing over half of the airport's tonnage with major operations of UPS, Royal Mail and FedEx providing the remainder. EMA is one of DHL's largest air freight hubs within the global network with 16 dedicated aircraft parking stands and over 30 aircraft handled each night and it is considered that the airports 24-hour operation and proximity to the road network being the key enabler for the express industry.

4.8 Cargo operations are mostly at night, with aircraft arriving and departing and HGVs accessing the airport from early evening to early morning. Cargo staff generally work overnight shifts, starting between 20:00 and 22:00. So, although this activity avoids peak traffic on the road network, it is more likely to be disrupted by overnight roadworks and operational traffic related to the Proposed Development.

4.9 Passengers

4.10 The Airport also plays a significant role in passenger flights, providing circa 4 million passengers with flights to more than 70 short-haul leisure destinations. Passenger activity at EMA peaks in the summer season and varies throughout the day.

4.11 Most passenger aircraft flying from the airport are based at EMA and so depart between 06:00 and 09:00, requiring passengers and colleagues to arrive as early as 03:00. Although these times fall outside peak traffic hours, limited public transport options and low road traffic volumes at these times, make cars (private or taxi) the preferred travel mode.

4.12 Similarly, passenger aircraft arrivals typically occur in the early afternoon or late evening, when the road network is typically less congested and makes travel by car a more attractive option. This is

reflected by the current mode share for private car usage being 68%, with an additional 22% using a taxi.

4.13 **Collaborative working**

4.14 Over two decades, EMA has built strong partnerships with local authorities, transport boards and businesses to enhance its transport network. The Airport has ongoing focused dialogue with the Highway Authorities and stakeholder engagement with National Highways through RIS. EMA also regularly holds an annual Transport Forum which includes Midlands Connect, National Highways, and Network Rail and partners with regional developers, contributing to public transport improvements and regional economic initiatives.

4.15 From an airport perspective, it is essential that the effect of the growth of the airport and future developments in the surrounding area is fully considered in future road investment and improvement plans. The success of EMA's cargo and passenger operations rests on the reliability of road journeys and journey times to and from the airport. Working closely with stakeholders helps plan highway works and any road closures to minimise disruption and at times ensure they have the least effect on road access to EMA.

5. AVAILABILITY OF INFORMATION

5.1 Taking account of the nature of the airport's operations, as described above, there are clear potential impacts in respect of both the construction and operational phases of EMG2.

5.2 Both phases are as important to EMA and whereas it is often the operational phase impacts that the planning system might focus on, it is the construction impacts that may in fact have more damaging impacts on the operations at EMA, which as stated are sensitive over both 24hrs and 365 day timescales.

5.3 It is therefore concerning to EMA that the information currently supplied by the Applicant seems to overlook the construction phase impacts on the airport and are not addressed in anywhere near enough detail for EMA to be satisfied at this stage.

5.4 Given the potential impacts during the construction phase, it is not acceptable for the impacts to be managed by a Construction Transport Management Plan (CTMP) or similar: they need to be assessed now. This is in part due to the scale of the proposed works by the Applicant but also because there could be detailed arrangements concerning assets such as the landing lights (explained below) that need to be carefully planned out and agreed. Perhaps most significantly, there is potential for severe disruption to time sensitive delivery of goods to the cargo operators throughout the day, but particularly at night when it might otherwise be expected to have major road closures in place.

5.5 Even after the Applicant's submissions at D1, the detail provided in the transport assessments and the ES is insufficient to provide necessary assurances that delivery of the highway works and the operational traffic from EMG2 will not disrupt airport operations.

5.6 A detailed list of information relating to traffic and transport that still needs to be provided by the Applicant is provided for the ExP's benefit at **Appendix 3**. In respect of each instance of outstanding information, a brief explanation is provided as to why that information is important to the proper examination of the application for a DCO for EMG2. It deserves a particular mention that SCP have serious concerns about the validity of the Applicant's road safety audit (Appendix 1, paras 8.40-8.49).

5.7 At Deadline 2, EMA noted that the Applicant apparently continues to share information relating to traffic and transport selectively with National Highways and Leicestershire County Council, seeking to reach agreed positions with those parties without the relevant information being available to either the ExP or other Interested Parties.

5.8 This continues to be the case and further instances are noted in SCP's report. This approach by the Applicant does not allow for proper examination of matters related to traffic and transport. It has a chilling effect on the ability of the ExP and Interested Parties to engage with the full range of relevant

information. It has led to stakeholders agreeing positions with the Applicant without having had the benefit of seeing other parties' positions on the relevant issues through the Examination process. For example, the Applicant does not appear to have factored in planned future growth of the airport. Similarly, it cannot tell from the information provided whether the Applicant's assessments cover the airport's peak, or the air cargo peak in the autumn. These are material factors for stakeholders such as National Highways and Leicestershire County Council to be aware of, which would have become apparent earlier in the Examination had the Applicant provided a full suite of traffic and transport information with its application.

6. AERODROME SAFEGUARDING – HIGHWAYS MATTERS

6.1 Lighting

6.2 Aircraft arriving at EMA rely on a system of landing lights on their approach. Those lights potentially impacted are arranged to the east of the airport in a pattern prescribed by international and UK civil aviation standards and regulations. They have to be spaced at prescribed, at regular intervals and operate on independent power circuits so they always remain active.

6.3 The landing lights are critical to the airport's ability to operate in low visibility conditions and at night. If the lights are off, or unable to comply with regulations and meet safety standards, the runway has to be closed.

6.4 Accordingly, EMA need to understand any potential impacts to the current layout, operation and maintenance of the landing lights from the Proposed Development (both operation and construction phase). At present, EMA does not have sufficient information from the Applicant to wholly satisfy itself in that respect.

6.5 For example, EMA requires clarification from the Applicant that:

6.5.1 It is not proposed to move any of the landing lights or affect maintenance access;

6.5.2 In relation to works proposed to the M1, any changes to gantries or signage to not change the lighting context for the landing lights – e.g. dark areas need to be maintained to keep the approach lights visible to aircraft.

6.6 EMA notes that there is currently no proposal for the Active Travel Link comprised in Work No 14 to be lit. Should that position change during Examination, the impact of any such lighting on the landing lights or more widely any glint or glare issues, will need to be understood and addressed accordingly.

6.7 The integrity of the system of landing lights is fundamental to the operation of the airport. Any impacts to them needs to be understood now, not deferred to be dealt with through the CTMP or protective provisions.

6.8 Security

6.9 The Active Travel Link proposed as Work No 14 would run close to the airport's security fence.

6.10 The fence is 3m in height. National aviation security standards dictate that there can be nothing, including vegetation, within 3m either side of the fence.

6.11 In view of that fact, and without prejudice to its position on the need for the Active Travel Link, EMA submits that the draft DCO needs to be amended to:

6.11.1 Allow EMA, in consultation with the national aviation security regulator, to approve the precise position and level of Work No 14; and

6.11.2 Reduce or remove vertical and horizontal limits of deviation for Work No 14.

7. TRAFFIC & TRANSPORT - OVERARCHING CONCERNS

7.1 Inconsistent case for highway works

7.2 The Applicant's case for the highway works is unclear and at times inconsistent.

7.3 At several places in the application documents which attempt to justify the scale of intervention, there are varying views expressed as the purpose of the works. It is unclear whether each highway intervention is mitigation for the Proposed Development or is greater in scale than that to enable highway growth properly attributable to other developments, such as Isley Woodhouse and Ratcliffe on Soar Power Station. This is an important point so that the ExP and Secretary of State can:

7.3.1 make a clear judgement on which policy compliance test(s) the works should be judged against, and

7.3.2 factor the correct scale and quantum of works into the assessment of viability necessary to support a case for compulsory acquisition.

At present both are unclear.

7.4 The Applicant makes repeated reference to "piecemeal" interventions being deemed unsuitable (for example at DCO 7.4, Appendix 3) but at no point has provided any analysis or indicated any actual schemes, developed iteratively, to support this point. Accordingly, the DCO would authorise only highway works that are part of a more extensive scheme, which by the Applicant's admission is "potentially transformative in terms of unlocking housing and employment growth for East Midlands" (SoR 5.46).

7.5 On what basis has the Applicant decided that there is an agreed quantum of growth that requires mitigation by it, is unclear. This is very apparent at SoR 5.50 where the Applicant claims: *"In the absence of the DCO Scheme, therefore, major economic, housing and energy development across the region will continue to be constrained unless and until others in the private or public sectors step in to deliver a solution."* This indicates that the works proposed to J24 are designed to do more than simply mitigate the Proposed Development.

7.6 Further, regardless of whether the larger scale re-development of J24 itself is warranted as a project that delivers wider benefits, the basis of the growth the Applicant relies upon is critical. The NWL Local Plan is still at an early stage in its development and so there is no certainty that all growth would come forward in the way in which the Applicant contends. The risk remains that the improvements proposed to J24 are disproportionate to mitigate the impacts of the Proposed Development, and thus not necessary in their current form.

7.7 Lack of mitigation

7.8 EMA is concerned that there are likely to be substantial traffic and transport impacts on its business, or on the safety of the network, from the construction and operation of EMG2 for which no mitigation is proposed. It is not just EMA that would be affected, but also the c.90 companies who operate from the airport site including global logistics operators such as DHL, UPS and FedEx.

7.9 For example:

7.9.1 No mitigation is currently proposed by the Applicant at the junction of Green Lane and the A453, despite substantial queues of traffic all the way back to Diseworth (Appendix 1, para 4.31);

7.9.2 No mitigation is currently proposed by the Applicant at the A453/East Midlands Airport roundabout – the proposed access to Isley Woodhouse - leading to queuing and safety issues (Appendix 1, para 4.39);

7.9.3 The Applicant has not provided any details on how the impacts of construction of the highway works are themselves to mitigated, during a construction period that SCP believe could last a number of years, although no detailed programming information has been provided by the Applicant. Any overnight closures to the M1 – for example to move gantries – are of particular concern to EMA (Appendix 1, para 5.21 bullet 4).

7.10 **Effectiveness of mitigation measures**

7.11 Where the Applicant has proposed highway works to mitigate impacts on the network, EMA needs to be satisfied that those impacts will in fact be mitigated and that no new impacts will be generated.

7.12 For example:

7.12.1 The Applicant has not provided modelling output results for the A452/Beverley Road roundabout making it impossible for EMA to understand the traffic impacts of the Proposed Development on that critical junction (Appendix 1, para 4.27); and

7.12.2 In certain scenarios the Applicant's proposed works to the southbound off-slip of the M1 appear to generate significant additional queueing about which there must be significant safety concerns (Appendix 1, para 4.11).

7.13 **Necessity & proportionality of highway works**

7.14 EMA needs to be satisfied that the highways works proposed by the Applicant are necessary and proportionate.

7.15 Works that are unnecessary and/or disproportionate to the relevant impacts potentially lead to greater impacts on EMA through longer periods of construction.

7.16 Unnecessary or disproportionate works also cost more, artificially generating a negative impact on the viability of the Proposed Development. If the same impacts could be mitigated with highway works that cost less, the viability of EMG2 would be improved. If the viability for EMG2 improved, it would weaken the Applicant's case for the compulsory acquisition of the MAG/Prologis land.

7.17 No information has been provided to show how the highway works were arrived at through an iterative process and specifically whether any less intrusive measures were considered as alternatives. An example would be in relation to the works proposed to the M1 northbound link road to the A50 (Appendix 1, para 4.49).

8. PROTECTION – DDCO AND DMCO

8.1 EMA set out its position in relation to protective provisions at Deadline 2.

8.2 EMA's position in relation to Work No 14 is set out above.

8.3 In addition, to address uncertainty around the volume of traffic associated with advanced manufacturing uses and mezzanine floors, EMA requests that the ExP seeks a requirement in the dDCO which would limit the number of trips at EMG2, by plot and for the Proposed Development as a whole (Appendix 1, para 5.4 to 5.20).

9. ACTIVE TRAVEL LINK – MAPPING DISCREPANCY

9.1 It will be recalled that in our response on CAH1 action point 3, EMA identified a mapping discrepancy in relation to the Active Travel Link.

9.2 Without prejudice to EMA's position that there is no need for the Active Travel Link justifying compulsory acquisition:

9.2.1 EMA has spoken with the Applicant and agreed a new route for the ATL. As far as EMA is aware, that remains with NH and LCC for agreement; and

9.2.2 Whilst EMA recognise that the Applicant's intention was not to take any operational land from the existing car park to construct Work No 14, we would welcome further dialogue on revising the land plan(s) to reflect the appropriate boundary of Plot 2/6 to clarify the extent of land that the Applicant is looking to acquire for the purposes of the Active Travel Link.

APPENDIX 1

SCP TECHNICAL NOTE 04

Technical Note 04

East Midlands Airport - EMG2 DCO

Highways and Transport Review

Our reference: SC/SP/251399/TN04 – Rev4.0

Author:	Date: 28/04/2026	Reviewer:	Date: 28/04/2026

1.0 INTRODUCTION

1.1. This technical note has been produced following a review of addition highways documentation submitted at Deadline 1 and in response to the Examining Panel's questions. The technical note has been set out in specific sections for ease of reference; a summary has been provided at the start of each section to highlight the key findings.

1.2. The assessment has not only assessed the operation of the development on the local road network but has assessed the scheme with respect to the operation of the airport. The airport is a key hub for freight movement and as such there are significant nighttime operations which will need to be considered. In addition, the airport serves over 4 million passengers with flights peak during the summer months.

1.3. The following is a series of questions and queries insofar as we are not satisfied there is enough information available to be sure of the highways impacts arising from the proposed development which may conflict with airport operations.

2.0 HIGH-LEVEL MODELLING AND ASSESSMENT REVIEW SUMMARY

2.1. The following modelling scenarios were tested by the Applicant as part of the assessment of the development:

- Stage 1A modelling (Proforma v14, Uncertainty Log v7) = 2028/2038 forecast years with and without EMG2, including, consented and committed sites as well as draft Local Plan allocation sites and Ratcliffe on Soar power station, which is authorised by a Local Development Order (LDO);
- Stage 1B modelling (Proforma v14a, Uncertainty Log v7a) = 2028/2038 forecast years with and without EMG2, including consented and committed sites but excluding the draft Local Plan allocation sites and Ratcliffe on Soar power station (beyond the element of Ratcliffe power station development which is currently able to proceed under the LDO);
- Stage 2A modelling = as per Stage 1A but with the inclusion of the proposed Highway Works, details of which are presented in Section 12; and
- Stage 2B modelling = as per Stage 1B but with the inclusion of the proposed Highway Works, details of which are presented in Section 12.

2.2. Based on these modelling the following traffic demand sets were then modelled by the Applicant for each respective junction based on the different scenarios as outlined above.

- 2028 forecast opening year 'without development'

- 2028 forecast opening year 'with development'
- 2038 forecast future year 'without development'
- 2038 forecast future year 'with development'
- 2028 forecast future year with development with mitigation.
- 2038 forecast future year with development with mitigation

2.3. In addition to the design review, a high-level review of the modelling and assessment for the DCO application was undertaken. This assessment looked at the modelling of the junctions in the vicinity of the site specifically looking at junctions where mitigation has been suggested and where models have identified that junctions will be going over capacity as a result of the development traffic.

2.4. It should be noted that the review of the transport assessment and other accompanying documents did not provide a traffic flow model for the base or the base plus development traffic this made it difficult to understand the level of traffic that was anticipated at each junction and on each arm of those junctions. It is suggested that this will need to be provided to provide clarity on what traffic is modelled at each junction.

2.5. In addition, text contained in a letter from Gowling WLG dated 24th February 2026 indicated that the VISSIM modelling based on the PRTM 2019 model is complete and agreed. Having reviewed the documentation it's clear that National Highways are content with the modelling that has been undertaken however at this stage LCC still require clarifications with regard to the modelling.

3.0 PRTM SENSITIVTY NOTE

3.1. This information is taken from DCO 7.8 PRTM 2023 Sensitivity Test Technical Note and Local Road Network Impact Assessment Note Deadline 1(120450063) which sets out the difference between the SRN and local Roads between the 2019 and 2023 model - generally speaking there is more traffic on the local road network in 2019 than 2023. Whilst on the SRN some links show that the 2019 is higher whilst on other links the 2023 is higher.

Table 23: Change in Base Flows on the SRN

Ref	Link Description	A Node	B Node	A-B	AM + PM		Diff
					2019 PRTM Base	2023 PRTM Base	
EB	A453 The Green - Airport Signals	50301	50485	50301-50485	924	814	-110
WB	A453 Airport Signals - The Green	50485	50301	50485-50301	757	674	-83
EB	A453 Airport Signals - Site Access Roundabout	74137	50386	74137-50386	1118	1396	278
WB	A453 Site Access Roudabout - Airport Signals	50386	74137	50386-74137	1012	1192	180
EB	A453 Site Access Roundabout - Finger Farm	88740	88733	88740-88733	1678	1762	84
WB	A453 Finger Farm - Site Access Roundabout	88733	88740	88733-88740	1705	1641	-64
NB	A453 Finger Farm - EMG1 Access	88729	76089	88729-76089	3579	2630	-949
SB	A453 EMG1 Access - Finger Farm	76089	88729	76089-88729	1298	1547	249
NB	A453 EMG1 Access - M1 J24	76091	76107	76091-76107	4074	3122	-952
SB	A453 M1 J24 - EMG1 Access	76107	76091	76107-76091	1015	1511	496
NB	A50 M1 J24 - M1 J24A	50478	7253	50478-7253	6019	5554	-465
WB	A50 M1 J24A - A50 J1	59983	50568	59983-50568	6825	6971	146
EB	A50 J1 - A50 M1 J24A	59981	50557	59981-50557	5975	6750	775

Table 24: Change in Base Flows on the Local Road Network

Link Description	AM + PM Base Flows		Difference
	2019 PRTM	2023 PRTM	
Kegworth via A453/A6 Kegworth Bypass	2746	1747	-999
Kegworth via M1 Junction 24	2332	2392	60
Disworth (Grimes Gate + The Green)	995	635	-360
Castle Donington via un-named Road	2274	1743	-531
Isley Walton (A453)	2496	1999	-497

Figure 1. Comparison of 2019 to 2023 Flows on selected SRN and Local Road links.

3.2. Overall, it is noted that the 2019 PRTM model provides a higher level of baseline traffic.

3.3. As part of the sensitivity note the 2019 VISSIM model has been retained to test the operation of the key junctions on the SRN using outputs from PRTM 2023 sensitivity test. These have been

compared against the results of the EMFM 2019 core modelling to understand the differences and whether the proposed mitigation continues to mitigate the impacts of the EMG2 development.

3.4. When comparing the results of the 2019 modelling to 2023 modelling the following observations can be made (using the Stage 2A 2028 modelling as an example) – see the figure below.

Figure 2. EMFM 2019 vs PRTM 2023 - Stage 2A 2028 Modelling

Table 19: Stage 2A 2028 Mean Maximum Queue Comparison (Metres)

Mean Max Queues (m)			2028 AM				2028 PM			
	Junction	Approach	Base	WoD	WD Mit	Miti - WoD	Base	WoD	WD Mit	Miti - WoD
1	Finger Farm	A453 W	25	49	36	-13	22	22	21	-1
2	Finger Farm	A453 N	20	28	38	10	13	17	28	11
3	Finger Farm	M1/A42 S	40	67	52	-15	19	18	17	-1
11	M1 J24	M1/A50	169	262	432	170	91	121	297	176
12	M1 J24	Remembrance Way	90	61	53	-8	95	578	197	-381
13	M1 J24	Deby Road	41	69	70	1	33	46	55	9
15	M1 J24	A453 S	39	85	72	-13	68	88	102	14
16	M1 J24	Hilton Hotel Lane	23	603	385	-218	15	46	26	-20
17	M1 J24	M1 NB South of Slip	0	1446	0	-1446	0	216	0	-216
20	M1 J24	M1 NB Off Slip	79	1159	67	-1092	52	448	61	-387
24	EMG1 Gyratory	Kegworth By-Pass	197	153	184	31	131	121	121	0
25	EMG1 Gyratory	A453 S	129	238	98	-140	101	72	61	-11
26	EMG1 Gyratory	Wilders Way L-Turn	7	4	4	0	7	9	12	3
27	EMG1 Gyratory	Wilders Way Ahead	3	5	4	-1	6	8	9	1
28	EMG1 Gyratory	A453 S Left turn	63	87	71	-16	37	42	46	4
29	EMG1 Gyratory	Kegworth By-Pass Left Turn	124	122	174	52	79	85	98	13
30	EMG1 Gyratory	A453 N	113	63	60	-3	36	38	38	0
31	M1 J24	M1 SB Offlip (M1)	0	14	761	747	0	0	0	0
32	M1 J24	M1 SB Offlip (A50)	0	38	1178	1140	0	0	1	1

Table 11: Stage 2A 2028 Mean Max Queue Comparison (Metres)

Mean Max Queues (m)			2028 AM				2028 PM			
	Junction	Approach	Base	WoD	WD Mit	Miti - WoD	Base	WoD	WD Mit	Miti - WoD
1	Finger Farm	A453 W	25	389	27	-362	22	24	19	-5
2	Finger Farm	A453 N	20	26	36	10	13	14	23	9
3	Finger Farm	M1/A42 S	40	123	36	-87	19	25	17	-8
11	M1 J24	M1/A50	169	258	286	28	91	143	203	60
12	M1 J24	Remembrance Way	90	570	271	-299	95	2384	1320	-1064
13	M1 J24	Deby Road	41	43	52	9	33	31	37	6
15	M1 J24	A453 S	39	81	77	-4	68	79	102	23
16	M1 J24	Hilton Hotel Lane	23	59	85	26	15	19	17	-2
17	M1 J24	M1 NB South of Slip	0	868	0	-868	0	0	0	0
20	M1 J24	M1 NB Off Slip	79	1108	77	-1031	52	53	46	-7
24	EMG1 Gyratory	Kegworth By-Pass	197	338	192	-146	131	130	94	-36
25	EMG1 Gyratory	A453 S	129	801	118	-683	101	94	62	-32
26	EMG1 Gyratory	Wilders Way L-Turn	7	1	2	1	7	5	5	0
27	EMG1 Gyratory	Wilders Way Ahead	3	1	2	1	6	6	5	-1
28	EMG1 Gyratory	A453 S Left turn	63	182	74	-108	37	36	38	2
29	EMG1 Gyratory	Kegworth By-Pass Left Turn	124	292	153	-139	79	91	73	-18
30	EMG1 Gyratory	A453 N	113	64	56	-8	36	31	34	3
31	M1 J24	M1 SB Offlip (M1)	0	13	1	-12	0	0	0	0
32	M1 J24	M1 SB Offlip (A50)	0	10	0	-10	0	0	0	0

3.5. The results show the same scenario (Stage 2A) between the two different models. What is apparent is the difference in overall results on some of the approaches with the largest differences associated on the M1 off slip with significant queues in the 2019 modelling however with little to no queues from the 2023 model. This is indicative of the varying nature of the two models. An understanding of the inherent differences would be beneficial. Without that, it is not possible to be confident in the divergent results for the southbound off slip of J24 (rows 31 and 32 of the tables).

3.6. Confirmation is also required as to why the 2023 model is not being used, which has been validated by LCC and NH.

4.0 JUNCTION MODELLING ASSESSMENT

4.1. This section provides an assessment of the issues identified in terms of the results of the modelling in the Applicant's Transport Assessment and has identified a number of key junctions where key findings have been identified.

4.2. The modelling has focussed on the results of the following junctions, with a key summary of the findings outlined below with further information still needed for each junction outlined in more detail also provided below:

- Junction 6 - M1 Junction 24 – Mitigation has been provided on the approaches, the circulatory carriageway and on the approach to the junction, due to a lack of data it is not clear if the scale of improvements on the M1 northbound off slip are proportionate to the development. In addition the improvements on the M1 and A50 southbound off slips show significant queues in Scenario 2A.
- Junction 2 – A453/Beverley Road Roundabout - No modelling results are included for this junction so unable to ascertain the operation of the junction at this time.
- Junction 3: Finger Farm Roundabout – Minor mitigation proposed due to traffic diverting to the M1 J24, no data is provided detailing the amount of traffic to be diverted.
- Junction 8 - A453/The Green Priority Junction - The results show that there will be significant queueing back on the minor arm of the junction, No mitigation is proposed at this junction which could lead to safety issues.

4.3. Junction 9: A453/East Midlands Airport Roundabout The results of the Arcady modelling show that as a result of the development traffic in the design year the queues generated extend to the signalised junction to the west. No mitigations is proposed at this junction, which may result in safety issues.

Junction 6 - M1 Junction 24

4.4. This junction has been included in the VISSIM model and the result for this model have been assessed by us. However, the input data and modelling methodology have not been provided by the Applicant and therefore have not been assessed by us at this time. Based on the results present the major impact is on the southbound off slip where a significant amount of traffic can be expected.

4.5. The Stage 1A Mean Max Queue (MMQ) in the 2028 scenario indicates that with the inclusion of the development the queue on the M1 southbound (SB) off slip (A50) *(See table 3 of DCO6.6A Transport Assessment Part 7 of 10)* the queue within the AM peak will increase from 38m to 669m (an increase of 631m), this is indicative of the development adding traffic to the approaches. This is evidenced in the figure below.

4.6. In regard to the Maximum modelled queue length in 2028 the M1 SB off slip (A50) *(See table 4 of DCO6.6A Transport Assessment Part 7 of 10)* shows an increase of the maximum queue length when comparing the Without Development scenario to the Development Scenario from 189m to 1053m in the AM peak period, again this is indicative of the development increasing the traffic on this approach. This is evidenced in the figure below.

Figure 3. Stage 1a Modelling - 2028 Mean Maximum Queue and Maximum Queue

Table 3: Stage 1A 2028 Mean Maximum Queue Comparison (Metres)

Mean Max Queues (m)			2028 AM				2028 PM			
	Junction	Approach	Base	WoD	WD	WD-WoD	Base	WoD	WD	WD-WoD
1	Finger Farm	A453 W	25	49	100	51	22	22	43	21
2	Finger Farm	A453 N	20	28	43	15	13	17	31	14
3	Finger Farm	M1/A42 S	40	67	140	73	19	18	22	4
11	M1 J24	M1/A50	169	262	419	157	91	121	124	3
12	M1 J24	Remembrance Way	90	61	72	11	95	578	556	-22
13	M1 J24	Deby Road	41	69	82	13	33	46	47	1
15	M1 J24	A453 S	39	85	91	6	68	88	138	50
16	M1 J24	Hilton Hotel Lane	23	603	782	179	15	46	47	1
17	M1 J24	M1 NB South of Slip	0	1446	1641	195	0	216	85	-131
20	M1 J24	M1 NB Off Slip	79	1159	898	-261	52	448	454	6
24	EMG1 Gyratory	Kegworth By-Pass	197	153	253	100	131	121	174	53
25	EMG1 Gyratory	A453 S	129	238	300	62	101	72	105	33
26	EMG1 Gyratory	Wilders Way L-Turn	7	4	10	6	7	9	11	2
27	EMG1 Gyratory	Wilders Way Ahead	3	5	8	3	6	8	10	2
28	EMG1 Gyratory	A453 S Left turn	63	87	104	17	37	42	45	3
29	EMG1 Gyratory	Kegworth By-Pass Left Turn	124	122	226	104	79	85	114	29
30	EMG1 Gyratory	A453 N	113	63	75	12	36	38	44	6
31	M1 J24	M1 SB Offlip (M1)	0	14	137	123	0	0	0	0
32	M1 J24	M1 SB Offlip (A50)	0	38	669	631	0	0	0	0

Table 4: Stage 1A 2028 Maximum Queue Comparison (Metres)

Maximum Queues (m)			2028 AM				2028 PM			
	Junction	Approach	Base	WoD	WD	WD-WoD	Base	WoD	WD	WD-WoD
1	Finger Farm	A453 W	39	75	198	123	30	35	67	32
2	Finger Farm	A453 N	48	40	47	7	20	23	39	16
3	Finger Farm	M1/A42 S	49	84	200	116	27	26	29	3
11	M1 J24	M1/A50	279	400	431	31	114	145	150	5
12	M1 J24	Remembrance Way	126	69	76	7	145	812	785	-27
13	M1 J24	Deby Road	55	84	105	21	39	55	55	0
15	M1 J24	A453 S	53	109	135	26	98	126	177	51
16	M1 J24	Hilton Hotel Lane	34	800	1037	237	25	52	62	10
17	M1 J24	M1 NB South of Slip	0	2409	3010	601	0	482	274	-208
20	M1 J24	M1 NB Off Slip	109	1691	1090	-601	62	582	587	5
24	EMG1 Gyratory	Kegworth By-Pass	423	212	359	147	182	242	272	30
25	EMG1 Gyratory	A453 S	197	386	608	222	118	90	152	62
26	EMG1 Gyratory	Wilders Way L-Turn	16	10	16	6	16	17	16	-1
27	EMG1 Gyratory	Wilders Way Ahead	6	8	12	4	10	11	12	1
28	EMG1 Gyratory	A453 S Left turn	105	137	187	50	47	50	56	6
29	EMG1 Gyratory	Kegworth By-Pass Left Turn	255	171	321	150	146	162	181	19
30	EMG1 Gyratory	A453 N	202	72	84	12	52	53	60	7
31	M1 J24	M1 SB Offlip (M1)	0	38	229	191	0	0	0	0
32	M1 J24	M1 SB Offlip (A50)	0	189	1053	864	0	0	0	0

4.7. The Stage 1B modelling also indicates that the development traffic will cause an increase in queue lengths when comparing the without development scenario to the with development scenario, see the figure below with particular reference to the M1 SB off slips and the M1 NB off slips.

Figure 4. Stage 1b 2028 Modelling Results

Table 11: Stage 1B 2028 Mean Maximum Queue Comparison (Metres)

Mean Max Queues (m)			2028 AM				2028 PM			
	Junction	Approach	Base	WoD	WD	WD-WoD	Base	WoD	WD	WD-WoD
1	Finger Farm	A453 W	25	71	69	-2	22	29	119	90
2	Finger Farm	A453 N	20	34	44	10	13	17	30	13
3	Finger Farm	M1/A42 S	40	91	152	61	19	24	25	1
11	M1 J24	M1/A50	169	290	427	137	91	115	115	0
12	M1 J24	Remembrance Way	90	327	906	579	95	674	732	58
13	M1 J24	Deby Road	41	66	71	5	33	45	45	0
15	M1 J24	A453 S	39	78	90	12	68	81	107	26
16	M1 J24	Hilton Hotel Lane	23	80	93	13	15	36	38	2
17	M1 J24	M1 NB South of Slip	0	8	915	907	0	0	1	1
20	M1 J24	M1 NB Off Slip	79	166	824	658	52	73	108	35
24	EMG1 Gyratory	Kegworth By-Pass	197	130	235	105	131	106	130	24
25	EMG1 Gyratory	A453 S	129	402	231	-171	101	95	119	24
26	EMG1 Gyratory	Wilders Way L-Turn	7	100	30	-70	7	10	12	2
27	EMG1 Gyratory	Wilders Way Ahead	3	10	9	-1	6	9	11	2
28	EMG1 Gyratory	A453 S Left turn	63	72	83	11	37	42	44	2
29	EMG1 Gyratory	Kegworth By-Pass Left Turn	124	100	215	115	79	66	85	19
30	EMG1 Gyratory	A453 N	113	147	90	-57	36	42	47	5
31	M1 J24	M1 SB Offlip (M1)	0	31	466	435	0	0	0	0
32	M1 J24	M1 SB Offlip (A50)	0	17	753	736	0	0	0	0

Table 12: Stage 1B 2028 Maximum Queue Comparison (Metres)

Maximum Queues (m)			2028 AM				2028 PM			
	Junction	Approach	Base	WoD	WD	WD-WoD	Base	WoD	WD	WD-WoD
1	Finger Farm	A453 W	39	146	115	-31	30	40	175	135
2	Finger Farm	A453 N	48	56	53	-3	20	20	38	18
3	Finger Farm	M1/A42 S	49	146	207	61	27	29	33	4
11	M1 J24	M1/A50	279	430	432	2	114	124	136	12
12	M1 J24	Remembrance Way	126	444	1283	839	145	1002	1125	123
13	M1 J24	Deby Road	55	81	80	-1	39	53	50	-3
15	M1 J24	A453 S	53	170	103	-67	98	92	146	54
16	M1 J24	Hilton Hotel Lane	34	101	106	5	25	44	51	7
17	M1 J24	M1 NB South of Slip	0	54	1517	1463	0	2	6	4
20	M1 J24	M1 NB Off Slip	109	321	1134	813	62	100	231	131
24	EMG1 Gyratory	Kegworth By-Pass	423	224	281	57	182	160	251	91
25	EMG1 Gyratory	A453 S	197	684	335	-349	118	111	138	27
26	EMG1 Gyratory	Wilders Way L-Turn	16	209	72	-137	16	14	18	4
27	EMG1 Gyratory	Wilders Way Ahead	6	15	11	-4	10	11	13	2
28	EMG1 Gyratory	A453 S Left turn	105	110	121	11	47	49	53	4
29	EMG1 Gyratory	Kegworth By-Pass Left Turn	255	168	277	109	146	86	126	40
30	EMG1 Gyratory	A453 N	202	214	123	-91	52	49	55	6
31	M1 J24	M1 SB Offlip (M1)	0	87	699	612	0	0	0	0
32	M1 J24	M1 SB Offlip (A50)	0	154	1154	1000	0	0	0	0

4.8. Importantly to note on this slip road there are two diverge points, the first diverge occurs at 446m from the stop line at the roundabout which forms a point at which traffic from the M1 southbound and the A50 meet whilst the second diverge point occurs at 821m back from approach stop line and forms the diverge between traffic heading towards the J24 circulatory and for traffic using the M1 southbound on slip travelling from the A50.

4.9. As can be shown by the modelling results from both the mean queue assessment and the max queue assessment the with development scenario will extend traffic beyond both these points as such this will have an increase safety risk due to the risk of collisions of vehicles approaching the junction.

4.10. As part of the proposals the following mitigation measures have been suggested have been modelled and tested by the Applicant as part of their assessment. The mitigation measures can be summarised as follows:

- Construction of a new free-flow link road from the M1 northbound to provide a direct link to the A50 westbound, which will cross over the A453, and will include the A50 westbound merge alterations (DCO Works Nos. 9 and 10);
- Widening of the A50 eastbound link at J24 and other related works and traffic management measures in this location (DCO Works No. 11);
- Alteration of the west side of the J24 roundabout to provide three lanes from the M1 northbound to A453 northbound through the junction, two lanes from the A453 northbound to the M1 northbound through the junction and removal of the segregated left-turn lane from the A453 northbound to the A50 westbound post feedback from NH (DCO Works No. 12a);
- Signing and lining amendments on the east side of the J24 roundabout and the A453 southbound approach (DCO Works No. 12b);
- Provision of new M1 northbound exit to the A50 and associated improvements to gantries signage, signals and road markings on the M1 (DCO Works No. 8); and
- Changes to the signage on the M1 northbound before J23A to sign the A50 via the new M1 J24 link road rather than via J23A as at present (DCO Works No. 16)

4.11. As noted in the bullet points above this sets out the proposed M1 Junction 24 improvements however it is apparent from the description the lack of detail in regard to the Southbound off slip even though quite significant works are proposed.

4.12. With the inclusion of the proposed mitigation (Stage 2A) modelling there are still significant increases in the Mean Maximum Queues within the AM peak when comparing the Without Development scenario to the With Development (+Mitigation) Scenario with an increase on the M1 SB off slip (M1) and M1 SB off slip (A50) of 747m and 1140m respectively up from 14m and 38m which is considered to be a significant increase in queues – see table 19 DCO6.6A Transport Assessment Part 7 of 10 (also shown below).

Figure 5. Stage 2A 2028 Modelling - MMQ

Table 19: Stage 2A 2028 Mean Maximum Queue Comparison (Metres)

Mean Max Queues (m)			2028 AM				2028 PM			
	Junction	Approach	Base	WoD	WD Mit	Miti - WoD	Base	WoD	WD Mit	Miti - WoD
1	Finger Farm	A453 W	25	49	36	-13	22	22	21	-1
2	Finger Farm	A453 N	20	28	38	10	13	17	28	11
3	Finger Farm	M1/A42 S	40	67	52	-15	19	18	17	-1
11	M1 J24	M1/A50	169	262	432	170	91	121	297	176
12	M1 J24	Remembrance Way	90	61	53	-8	95	578	197	-381
13	M1 J24	Deby Road	41	69	70	1	33	46	55	9
15	M1 J24	A453 S	39	85	72	-13	68	88	102	14
16	M1 J24	Hilton Hotel Lane	23	603	385	-218	15	46	26	-20
17	M1 J24	M1 NB South of Slip	0	1446	0	-1446	0	216	0	-216
20	M1 J24	M1 NB Off Slip	79	1159	67	-1092	52	448	61	-387
24	EMG1 Gyratory	Kegworth By-Pass	197	153	184	31	131	121	121	0
25	EMG1 Gyratory	A453 S	129	238	98	-140	101	72	61	-11
26	EMG1 Gyratory	Wilders Way L-Turn	7	4	4	0	7	9	12	3
27	EMG1 Gyratory	Wilders Way Ahead	3	5	4	-1	6	8	9	1
28	EMG1 Gyratory	A453 S Left turn	63	87	71	-16	37	42	46	4
29	EMG1 Gyratory	Kegworth By-Pass Left Turn	124	122	174	52	79	85	98	13
30	EMG1 Gyratory	A453 N	113	63	60	-3	36	38	38	0
31	M1 J24	M1 SB Offlip (M1)	0	14	761	747	0	0	0	0
32	M1 J24	M1 SB Offlip (A50)	0	38	1178	1140	0	0	1	1

4.13. As noted above in section 4.5 the queue in 2028 with no mitigation in place is 669m whilst with the mitigation in place there is a queue of 1140m which is a significant increase given the fact that mitigation has been provided. This shows the mitigation actually increases the length of queue and thereby causing more of an impact than if the mitigation wasn't included. This does not seem logical but additional data is not provided to explain this issue.

4.14. In relation to the maximum modelled queue length in the 2028 AM peak scenario (Table 20 DCO6.6A Transport Assessment Part 7 of 10) there is also significant increases in queue length from 38m to 1160m (an increase of 1122m) on the M1 SB off slip (M1), moreover on the M1 SB off slip (A50) the queue will increase from 189m to 1722m (an increase of 1533m).

Figure 6. Stage 2A 2028 Modelling - Maximum Queue

Table 20: Stage 2A 2028 Maximum Queue Comparison (Metres)

Maximum Queues (m)			2028 AM				2028 PM			
	Junction	Approach	Base	WoD	WD Mit	Miti - WoD	Base	WoD	WD Mit	Miti - WoD
1	Finger Farm	A453 W	39	75	62	-13	30	35	31	-4
2	Finger Farm	A453 N	48	40	45	5	20	23	34	11
3	Finger Farm	M1/A42 S	49	84	74	-10	27	26	20	-6
11	M1 J24	M1/A50	279	400	435	35	114	145	352	207
12	M1 J24	Remembrance Way	126	69	58	-11	145	812	230	-582
13	M1 J24	Deby Road	55	84	82	-2	39	55	66	11
15	M1 J24	A453 S	53	109	84	-25	98	126	128	2
16	M1 J24	Hilton Hotel Lane	34	800	464	-336	25	52	32	-20
17	M1 J24	M1 NB South of Slip	0	2409	1	-2408	0	482	0	-482
20	M1 J24	M1 NB Off Slip	109	1691	72	-1619	62	582	65	-517
24	EMG1 Gyratory	Kegworth By-Pass	423	212	289	77	182	242	161	-81
25	EMG1 Gyratory	A453 S	197	386	110	-276	118	90	70	-20
26	EMG1 Gyratory	Wilders Way L-Turn	16	10	9	-1	16	17	18	1
27	EMG1 Gyratory	Wilders Way Ahead	6	8	8	0	10	11	12	1
28	EMG1 Gyratory	A453 S Left turn	105	137	99	-38	47	50	51	1
29	EMG1 Gyratory	Kegworth By-Pass Left Turn	255	171	289	118	146	162	125	-37
30	EMG1 Gyratory	A453 N	202	72	74	2	52	53	46	-7
31	M1 J24	M1 SB Offlip (M1)	0	38	1160	1122	0	0	0	0
32	M1 J24	M1 SB Offlip (A50)	0	189	1722	1533	0	0	4	4

4.15. Importantly this increase indicates that the queue will reach the mainline of the M1 thereby causing potential significant safety concerns, moreover the queue on the A50 approach essentially queues all the back to the A50 off slip for the M1 Northbound. Which given that the mitigation has been provided indicates that the mitigation doesn't actually resolve the issues which are created by the development.

4.16. This issue is further exacerbated in 2038 with increases on the Mean Max Queue on the M1 Southbound off slip (M1) from 145m to 1121m (an increase of 976m) again reaching the mainline of the M1 which is a significant issue (see Table 21 DCO6.6A Transport Assessment Part 7 of 10).

4.17. Moreover, the queue on the A50 M1 SB off slip will also see an increase of 978m from 1321m to 2299m thereby reaching back to the A50 off slip onto M1 Northbound. This is also the case in regard to the maximum queue length in which will see the same issues in terms of queueing back onto the mainline and back towards (and past) the off slip at junction 24a.

Figure 7. Stage 2A 2033 Modelling

Table 21: Stage 2A 2038 Mean Maximum Queue Comparison (Metres)

Mean Max Queues (m)			2038 AM				2038 PM			
	Junction	Approach	Base	WoD	WD Mit	Miti - WoD	Base	WoD	WD Mit	Miti - WoD
1	Finger Farm	A453 W	25	562	40	-522	22	52	66	14
2	Finger Farm	A453 N	20	26	44	18	13	23	29	6
3	Finger Farm	M1/A42 S	40	216	47	-169	19	25	22	-3
11	M1 J24	M1/A50	169	428	434	6	91	146	281	135
12	M1 J24	Remembrance Way	90	971	784	-187	95	2209	1788	-421
13	M1 J24	Deby Road	41	71	84	13	33	51	68	17
15	M1 J24	A453 S	39	479	192	-287	68	96	111	15
16	M1 J24	Hilton Hotel Lane	23	1370	686	-684	15	226	40	-186
17	M1 J24	M1 NB South of Slip	0	1831	40	-1791	0	2	0	-2
20	M1 J24	M1 NB Off Slip	79	654	184	-470	52	163	59	-104
24	EMG1 Gyratory	Kegworth By-Pass	197	357	289	-68	131	226	231	5
25	EMG1 Gyratory	A453 S	129	1038	92	-946	101	104	93	-11
26	EMG1 Gyratory	Wilders Way L-Turn	7	25	5	-20	7	14	15	1
27	EMG1 Gyratory	Wilders Way Ahead	3	10	6	-4	6	10	11	1
28	EMG1 Gyratory	A453 S Left turn	63	205	61	-144	37	42	43	1
29	EMG1 Gyratory	Kegworth By-Pass Left Turn	124	316	267	-49	79	170	195	25
30	EMG1 Gyratory	A453 N	113	84	61	-23	36	41	43	2
31	M1 J24	M1 SB Offlip (M1)	0	145	1121	976	0	0	0	0
32	M1 J24	M1 SB Offlip (A50)	0	1321	2299	978	0	0	0	0

Table 22: Stage 2A 2038 Maximum Queue Comparison (Metres)

Maximum Queues (m)			2038 AM				2038 PM			
	Junction	Approach	Base	WoD	WD Mit	Miti - WoD	Base	WoD	WD Mit	Miti - WoD
1	Finger Farm	A453 W	39	1011	55	-956	30	95	153	58
2	Finger Farm	A453 N	48	39	63	24	20	28	34	6
3	Finger Farm	M1/A42 S	49	301	60	-241	27	32	30	-2
11	M1 J24	M1/A50	279	432	435	3	114	160	293	133
12	M1 J24	Remembrance Way	126	1349	1065	-284	145	2778	2683	-95
13	M1 J24	Deby Road	55	83	104	21	39	55	83	28
15	M1 J24	A453 S	53	811	384	-427	98	108	128	20
16	M1 J24	Hilton Hotel Lane	34	1645	1113	-532	25	323	48	-275
17	M1 J24	M1 NB South of Slip	0	2577	116	-2461	0	9	0	-9
20	M1 J24	M1 NB Off Slip	109	828	255	-573	62	269	63	-206
24	EMG1 Gyratory	Kegworth By-Pass	423	474	462	-12	182	294	390	96
25	EMG1 Gyratory	A453 S	197	1237	110	-1127	118	120	121	1
26	EMG1 Gyratory	Wilders Way L-Turn	16	40	13	-27	16	28	21	-7
27	EMG1 Gyratory	Wilders Way Ahead	6	12	9	-3	10	13	14	1
28	EMG1 Gyratory	A453 S Left turn	105	428	77	-351	47	46	51	5
29	EMG1 Gyratory	Kegworth By-Pass Left Turn	255	438	402	-36	146	245	324	79
30	EMG1 Gyratory	A453 N	202	101	80	-21	52	58	53	-5
31	M1 J24	M1 SB Offlip (M1)	0	198	1268	1070	0	0	0	0
32	M1 J24	M1 SB Offlip (A50)	0	1708	2308	600	0	0	0	0

4.18. Overall, despite mitigation being proposed on this arm of the junction it is the conclusion that the mitigation is not effective in mitigating the queuing which is predicted to extend to the M1 mainline and back towards J24a, based on scenario 2A. We would not expect the development to queue back onto the mainline of any motorway.

4.19. Scenario 2B without the local plan traffic and the power station development but with the mitigation in place shows the junction would have improvements particularly on both the M1 off slip approaches with reduction in the 2028 MMQ queue lengths from 31m in the WoD scenario to 16m in the WD Mitigation on the M1 off slip, whilst on the A50 off slip this reduces from 17m to 11m.

4.20. In regard to the maximum queue in 2028 this a similar situation in that the queue will also reduce from the WoD scenario to the WD mitigation scenario with a reduction in queue length on the M1 approach of 18m and 112m on the A50 approach. See the figure below which shows this information.

Figure 8. Stage 2b 2028 Modelling Results

Table 27: Stage 2B 2028 Mean Maximum Queue Comparison (Metres)

Mean Max Queues (m)			2028 AM				2028 PM			
	Junction	Approach	Base	WoD	WD Mit	Miti - WoD	Base	WoD	WD Mit	Miti - WoD
1	Finger Farm	A453 W	25	71	24	-47	22	29	24	-5
2	Finger Farm	A453 N	20	34	46	12	13	17	27	10
3	Finger Farm	M1/A42 S	40	91	43	-48	19	24	16	-8
11	M1 J24	M1/A50	169	290	345	55	91	115	203	88
12	M1 J24	Remembrance Way	90	327	382	55	95	674	401	-273
13	M1 J24	Deby Road	41	66	69	3	33	45	54	9
15	M1 J24	A453 S	39	78	68	-10	68	81	87	6
16	M1 J24	Hilton Hotel Lane	23	80	61	-19	15	36	31	-5
17	M1 J24	M1 NB South of Slip	0	8	1	-7	0	0	0	0
20	M1 J24	M1 NB Off Slip	79	166	66	-100	52	73	50	-23
24	EMG1 Gyratory	Kegworth By-Pass	197	130	183	53	131	106	98	-8
25	EMG1 Gyratory	A453 S	129	402	89	-313	101	95	65	-30
26	EMG1 Gyratory	Wilders Way L-Turn	7	100	4	-96	7	10	11	1
27	EMG1 Gyratory	Wilders Way Ahead	3	10	5	-5	6	9	9	0
28	EMG1 Gyratory	A453 S Left turn	63	72	75	3	37	42	46	4
29	EMG1 Gyratory	Kegworth By-Pass Left Turn	124	100	164	64	79	66	75	9
30	EMG1 Gyratory	A453 N	113	147	65	-82	36	42	40	-2
31	M1 J24	M1 SB Offlip (M1)	0	31	16	-15	0	0	0	0
32	M1 J24	M1 SB Offlip (A50)	0	17	11	-6	0	0	0	0

Table 28: Stage 2B 2028 Maximum Queue Comparison (Metres)

Maximum Queues (m)			2028 AM				2028 PM			
	Junction	Approach	Base	WoD	WD Mit	Miti - WoD	Base	WoD	WD Mit	Miti - WoD
1	Finger Farm	A453 W	39	146	35	-111	30	40	30	-10
2	Finger Farm	A453 N	48	56	54	-2	20	20	40	20
3	Finger Farm	M1/A42 S	49	146	54	-92	27	29	20	-9
11	M1 J24	M1/A50	279	430	418	-12	114	124	229	105
12	M1 J24	Remembrance Way	126	444	482	38	145	1002	516	-486
13	M1 J24	Deby Road	55	81	79	-2	39	53	68	15
15	M1 J24	A453 S	53	170	79	-91	98	92	96	4
16	M1 J24	Hilton Hotel Lane	34	101	79	-22	25	44	41	-3
17	M1 J24	M1 NB South of Slip	0	54	7	-47	0	2	0	-2
20	M1 J24	M1 NB Off Slip	109	321	73	-248	62	100	56	-44
24	EMG1 Gyratory	Kegworth By-Pass	423	224	266	42	182	160	134	-26
25	EMG1 Gyratory	A453 S	197	684	125	-559	118	111	71	-40
26	EMG1 Gyratory	Wilders Way L-Turn	16	209	8	-201	16	14	18	4
27	EMG1 Gyratory	Wilders Way Ahead	6	15	10	-5	10	11	13	2
28	EMG1 Gyratory	A453 S Left turn	105	110	92	-18	47	49	51	2
29	EMG1 Gyratory	Kegworth By-Pass Left Turn	255	168	265	97	146	86	93	7
30	EMG1 Gyratory	A453 N	202	214	72	-142	52	49	48	-1
31	M1 J24	M1 SB Offlip (M1)	0	87	69	-18	0	0	0	0
32	M1 J24	M1 SB Offlip (A50)	0	154	42	-112	0	0	0	0

4.21. The 2038 results also indicate a similar reduction in mean and maximum queue lengths when comparing the WoD scenario to the with development and mitigation scenario.

4.22. The mitigation provided at J24 which seeks to address current issues on the northbound Off slip are large scale even though the impact of the development has less of an effect on this approach. Based on the proposed distribution as presented by BWB in the TA (Table 30) this equates to 14% of the car distribution and 31% of HGV distribution in the AM peak hour and 15% and 34% in the PM peak hour.

4.23. This can be evidenced by the results of the modelling from the Stage 1a Modelling which models the effect of application without any mitigation in place.

4.24. Table 3 from DCO6.6A Transport Assessment Part 7 of 10 shows that in the AM peak period there is a pre-existing issue with queueing on the M1 NB Off Slip with the without development queue of 1159m in the 2028 AM, this indicates there is already an issue at the junction with no development traffic in place.

4.25. Once the development traffic is added this actually results in a reduction in queuing of 261m due to modelling reassigning traffic due to differing demands. This therefore indicates that mitigation on the network will divert traffic to enable the development traffic to be accommodated on the approach. This is indicative of the proposed mitigation relieving a pre-existing problem and not an issue associated with the introduction of the development traffic.

4.26. The assessment has indicated that this mitigation will actually relieve traffic at the Finger Farm Roundabout, but the data provided doesn't indicate the level of traffic diverted. As indicated above without knowing the level of diverted traffic it is difficult to understand the overall effect of the scheme. It should also be noted the any traffic traveling to the site from the south either using the M1 or the A42 would exit the M1 at Junction 23A as this provides direct access to the Finger Farm Roundabout and then to the site. It is highly unlikely that there will be significant traffic volumes from the south using Junction 24 to access the site directly. Ideally this would be confirmed via the traffic flow diagrams which are not available.

Junction 2: A453/Beverley Road Roundabout

4.27. No modelling results have been included in either the transport assessment or the VISSIM modelling forecast report for this junction. As this forms the access point to the site it is critical the capacity of this junction is known as it could affect the operation of the airport.

4.28. It should also be noted that this roundabout forms one of the key entry points to the Airport and business park and as such the operation of this roundabout will be critical to all these parties.

Junction 3: Finger Farm Roundabout

4.29. A significant proportion of traffic travelling to and from the site will pass through this junction, but no mitigation is proposed within the data available. The Prologis application identified the need for mitigation at this junction, based on a much smaller development. It is suggested further justification is needed as to why mitigation is not required at this junction. As indicated above the proposed M1 to A50 link road scheme is said to divert traffic away from this junction but from the data available it's not clear as to what level of traffic is diverted. This needs clarifying to understand the operation of this roundabout.

4.30. This is supported by the results of the Vissim modelling (Stage 2a modelling) indicating the junction will only operate with minor increases in queue length with the development traffic and mitigation in place albeit the mitigation being associated offsite from Finger Farm roundabout. Conversely the results of the with development modelling (without mitigation) indicate there will be significant increases in queueing on the approaches at the junction. As such this only operates effectively with the inclusion of the mitigation.

Junction 8: A453/The Green Priority Junction

4.31. This junction operates within capacity with no development traffic but with development traffic there are significant queues on the minor arm. As noted by BWB in section 1.11 "The junction is forecast to operate within capacity in East Midlands Freeport Model causing a larger volume of traffic to route via this junction. In reality, a greater proportion of traffic would route via the A42 and Finger Farm roundabout reducing impacts at this location". It is not clear how much traffic would reroute to the A42 and if this routed traffic has been included in the modelling of other junctions affected.

4.32. The results of the modelling indicate that there will be significant queueing on the minor arm approach to the A453. More specifically when comparing the results of Stage 1A modelling comparing the 2028 without development and with development scenarios there will be an increase in queue from 5.9 pcus (33m) to 122.9 pcus (706m) whilst in 2038 the without development queue on the minor arm is 6.1pcus (35m) then in the with development scenario this increases to 172 pcus (989m) which essentially queues all the back towards the village of Diseworth.

4.33. The Stage 2A modelling (which models the same level of traffic but with the proposed mitigation in place) indicates that there will be significant increases in queuing on the minor arm with a queue of 5.9m (33m) in the 2028 without development scenario which increases to 40.2 pcus (231m) in the 2028 with development and mitigation scenario.

4.34. Whilst in the 2038 without development scenario the modelled queue on the minor arm is 6.1pcus (35m) which increases to 72.9 pcus (419m) with a modelled queue delay of 505 seconds which equates to just over 13 minutes up from 56 seconds in the 2038 without development scenario. In terms of delay this is defined "as the maximum value of average delay per arriving vehicle".

4.35. It is noted in the TA, there is no physical mitigation is proposed at this junction however the aim of the mitigation is to increase the attractiveness of the A453 and Finger Farm junction thereby discouraging traffic from using the junction.

4.36. As noted by BWB in section 13.27 of the Transport Assessment "*In reality it is therefore envisaged that more strategic traffic looking to route via the A453/The Green junction in EMFM will instead take advantage of the increased capacity on the Strategic Road Network, and Finger Farm in particular, to access the site and Hunter Road to the north to and from the east rather than west. Some more local traffic may use Grimes Gate instead of The Green still"*

4.37. As such based on this, then additional traffic should be modelled on the other junctions to take account of this in order to sufficiently model the impacts of the development.

4.38. This is a highlight of the unusual process as any normal TA would need to demonstrate that there wouldn't be issue at this junction either by the rerouting of traffic or providing mitigations. The massive increase in queues and waiting times at the junction are likely to result in safety issues with traffic trying to exit the junction using unacceptable gaps. This is something normally requested by the local highway authority.

Junction 9: A453/East Midlands Airport Roundabout

4.39. In terms of the modelling conducted by BWB (see table 63 from the Transport Assessment) the 2028 without development scenario indicates that arm 3 (A453 West) will operate with an RFC above 0.85 with a queue length of 8 pcus (46m).

4.40. With the addition of the development in 2028 the RFC increases to 0.99 thereby indicating the junction is close to theoretical capacity with the queue increasing to 25.9 pcus (148m). In the 2038 without development scenario the RFC has been modelled as 1.11 (over theoretical capacity) with a modelled queue of 56.3 pcus (323m) which extends back towards the signalised junction downstream of the roundabout thereby potentially effecting the ability of the signalised junction to discharge traffic as such causing additional queuing back.

4.41. This issue is exacerbated with the addition of the development traffic in the 2038 scenario with a further increase in queueing to 74.3 pcus (427m) thereby extending along the A453 beyond the signalised junction.

4.42. Within the inclusion of the offsite mitigation (focussed on the SRN) there is a slight reduction in the queue on the western arm however this is still predicted to surpass the storage capacity in the 2038 with mitigation scenario with a modelled queue of 69.9 pcus (401m).

4.43. Overall the results for this junction show that in the base years (within the AM) the junction operates within capacity, however, in the base plus development scenario the results indicate queueing back on the A453 Western arm. This queue extends beyond the current storage capacity towards the junction downstream (Junction 10- A453/Walton Hill Signal Junction).

4.44. As noted by BWB in section 13.33 of the transport assessment "*this junction forms part of the site access strategy to the Isley Woodhouse settlement and is expected to undergo significant improvements to accommodate this development and other planned schemes. The issue with capacity is a result of the background traffic from Isley Woodhouse being included in EMFM modelling but none of the physical infrastructure (i.e. mitigation) which will inevitably be required to accommodate that development".*

4.45. As the Isley Woodhouse scheme has yet to be approved the assessment should ensure that the proposed SEGRO development can be accommodated on the junction without having a detrimental impact on adjacent junctions. Should the Isley Woodhouse scheme not be approved or the scheme is delayed the SEGRO development traffic would need to be accommodated on the road network safely and so some level of mitigation would need to be proposed if the SEGRO scheme was to be developed.

4.46. This is supported by the holding response by National Highways in relation to the Prologis development, which as noted in page 297 of DCO 7.2 – National Highways state that It should be noted that any measures associated with another planning application such as Isley Woodhouse cannot be relied upon as part of this application because the timescales and phasing are unknown and the Isley Woodhouse planning application is not consented.

4.47. As noted in BC0410001/TR0510002 which outlines the response by National Highways which indicates that NH is content that committed and emerging development, including Isley Woodhouse, has been taken into account in the Applicant's evidence.

4.48. Overall it should be noted that a number of the above junctions provide direct access to the Airport, the increased congestion identified and the lack of mitigation will have a detrimental impact on the operation of the Airport.

4.49. It should be noted that no modelling has been undertaken on any other mitigation measures. As part of a DCO application it would normally be expected that other mitigation options would be identified and reasons presented for not progressing with the options. All the work in this application revolves around one set of mitigation measures without any text to explain how these were derived. With the responses provided there are number of referenced to meetings held with the TWG, which includes other developers in the area. As the schemes have been discussed as part of that group it would imply that the mitigations is to address all schemes coming forward not just EMG2.

4.50. It should also be noted that a phased approach to mitigation has not been considered, the reports all indicate that the mitigation is needed before the development is occupied, however, it is considered that some development could be developed without having a material impact on the adjacent road network, minor changes could be made to the Finger Farm roundabout to provide a small increase in capacity to allow some development to be provided. It is assessments of this type that appear to be missing from the documents issued.

4.51. A key factor for the M1 to A50 link road at the M1 Junction 24 is that it would divert traffic from the Finger Farm Roundabout and provide additional capacity at the junction. However, there is no information indicating how much traffic this would divert and as such it is difficult to determine if the link road is an appropriate scale for the development and the traffic it is addressing.

5.0 OTHER CONSIDERATIONS

5.1. This section provides an overview of other key considerations, and these are summarised as follows

- With respect to local and national policies the lack of mitigation at a number of junctions on the network modelled would result in possible safety issues occurring, which is not in line with current policies.
- Advanced manufacturing trips rates can vary from one use to another, any approval for this type of development should ensure trips generated are within the limits set out within the TA.
- Additional mezzanine floor space has not been included in the models, this should be included to ensure a robust assessment. If this is not included a requirements should be provided to ensure the trips from each unit do not exceed those identified in the TA.
- The TA does not appear to have included future development traffic for the Airport.

Policy Compliance

5.2. This section provides an overview of the development proposals and gives consideration to its policy compliance in regard to the relevant transport policies with particular relevance to the National Planning Policy Framework (NPPF) December 2024 as stated in section 116 Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety.

5.3. It is the belief that the impact as stated above on the M1 Junction 24, and junctions highlighted above on the local road network, would cause an unacceptable impact on safety due to in particular queues extending back onto the mainline of the M1.

Advanced Manufacturing Trip Rate

5.4. As part of the application it is noted that at least 20% of the development could be allocated for Advanced Manufacturing (AM) land use. SCP have conducted a review of other AM sites across the UK and it's the conclusion that the inclusion of advanced manufacturing is likely to generate more trips than just a standard B8 land use.

5.5. The following sites were analysed as part of this assessment

- Rotherham Advanced Manufacturing Site
- International Advanced Manufacturing Park (IAMP) – Washington, Sunderland

5.6. It is noted that each application utilised a differing method for assessment of trip generation, including direct numbers of staff from the occupier, surveys of a nearby proxy site, also a first principles approach.

5.7. The table below outlines the trip generation as agreed for these applications, noting that both these trip rates were agreed by National Highways within their respective jurisdiction.

Table 1. Trip Rates from Other Advanced Manufacturing Sites

	AM		PM	
	Arrival	Departures	Arrival	Departures
International Advanced Manufacturing Park – Washington, Sunderland	0.507	0.315	0.225	0.253
Rotherham Advanced Manufacturing	0.710	0.081	0.102	0.457

5.8. These trip rates can then be compared to the proposed B8 and B2 trip rates as used in the DCO application, as shown in the figure below.

Table 1. Proposed Trip Rates

	AM Peak (08:00 – 09:00)			PM Peak (17:00 – 18:00)		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
B8 Trip Rates (retained from EMG1 Transport Assessment)*						
Total	0.140	0.036	0.176	0.065	0.155	0.220
HGVs	0.019	0.023	0.041	0.025	0.015	0.040
B2 Trip Rates (taken from TRICS)						
Total	0.392	0.071	0.463	0.049	0.369	0.417
HGVs	0.016	0.014	0.030	0.003	0.006	0.009

Figure 9. Trip Rates used as part of the B8 and B2 Land Uses

5.9. SCP have performed an analysis using the 20% value for advanced manufacturing at the EMG2 site using the IAMP trip rates (alongside the additional 100,000 sqm of mezzanine) and have established the potential increase in trips could be in the region of 788 in the AM and 454 in the PM.

5.10. A strategy regarding the provision of advanced manufacturing units needs to be agreed.

Mezzanine Floor - Trip Generation

5.11. Within section 3.4 of the "Trip Generation: Core Assessment" (Page 50 of Transport Assessment Part 2 of 10) it is noted that discussions were also held with the TWG as to whether a reduced trip rate should be applied to the 100,000sqm mezzanine floorspace on the basis that mezzanines do not typically generate the same volume of activity as ground floorspace.

5.12. Whilst 100,000sqm of mezzanine floor space was included in the assessment but as per section 7.8 of the TA 100,000sqm was added to the quantum of development and agreed with NH, as such it is the view that this should have formed part of the B8 traffic assessment as it is currently not included in the assessment.

5.13. Ultimately as the proposed extra mezzanine floor space has not been assessed in the transport assessment and the scale would result in significant traffic volumes, based on the trip rate as presented above this will results in an additional 140 arrivals, 36 departures totalling an additional 176 two way trips in the AM peak.

5.14. Whilst in the PM this would generate an additional 65 arrivals, 155 departures totalling 220 two way trips. This traffic should be included in the modelling to ensure the mitigation is robust.

5.15. It is also noted by National Highways (Appendix 36) that the additional 100,000 sqm floor space for storage/racking must be used for its intended purpose in perpetuity, ancillary to B8 ground floor space. There is no evidence as to how this would be managed or the level of trips monitored to ensure the trips don't exceed those agreed.

5.16. Based on previous experience involving this type of development National Highways and the relevant highway authority would always insist the full quantum of development is assessed however this hasn't occurred on this occasion.

5.17. Traffic counts undertaken at some of the B8 facilities on EMG1 have suggested that trips rates at that site are not as high as those in TRICS, however, this may be as a result of the end user not being a standard B8 company. These trip rates are shown in the figure below.

Table 2. EMG1 Surveyed B8 Trip Rates (Page 86 of the DCO 6.6A Transport Assessment Part 1 of 10.

Table 14. EMG1 Surveyed B8 Trip Rates (2024)

	AM Peak (08:00 – 09:00)			PM Peak (17:00 – 18:00)		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
Total	0.071	0.022	0.092	0.026	0.062	0.089
HGVs	0.015	0.012	0.028	0.015	0.015	0.029

5.18. Ideally TRICS data should be used as it offers a more robust assessment.

5.19. Based on this it is the conclusion that the additional 100,000m² should be included as part of the trip rate assessment this is based on previous experience involving this type of development, National Highways and the relevant highway authority would always insist the full quantum of development is assessed.

5.20. This is supported by LCC who note that, unconventionally, the Applicant has instead proposed wording as a DCO requirement (no.27) [PDA-005D] to seek to limit the highway impact of the additional mezzanine floorspace pursued. The Applicant has indicated agreement to this approach has been found with some TWG parties. However, agreement has not been reached with LCC and that the full quantum of floor space should be modelled to confirm the acceptability of the mitigation strategy or otherwise.

General Comments

5.21. In terms of other comments the following can be provided:

- It should be noted that the TA does not make any reference to future growth of the airport operations. East Midlands Airport is experiencing strong growth, particularly in cargo, with a 12% year-on-year increase in freight volumes reported in early 2026, making it the UK's leading dedicated cargo hub. The airport is expanding its cargo capacity, with new partners like SF Express increasing long-haul flights, while also planning for future passenger growth, serving over 4 million passengers annually. The number of traffic movements associated with the Airport growth in the model needs to be confirmed.
- In regard to state of commonality it is understood that the Statement of Common Ground (SoCG) reports are all under discussions except those for Nottinghamshire County Council and the Forestry Commission. Whilst it is understood that the SoCG with National Highways is well advanced there are still some items to agree.
- A CTMP has been produced in which it identifies the volume of construction traffic associated with the development of the site itself. The document sets out the mechanism by which traffic has been calculated and how this will be monitored. There should be a requirement set to ensure this monitoring process is implemented and reported to the appropriate authorities.
- There is very little information in the documentation with respect to the off-site construction works for the mitigation measures. Particularly those at the M1 J24 will need detailed planning not just for the works but around the airport operations and businesses in the vicinity of the junction. There should be an option of IP's to be able to comment on the program for these works as well as understand the level of construction traffic. This would also need to cover the work planned to the gantries on the M1 which are likely to require road closures for the works to be undertaken.

6.0 RESPONSE TO EXAMINING BODIES

6.1. This section provides an overview of the responses by the relevant key stakeholders to ascertain their current understanding and position on key transport related aspects of the development proposals.

Applicant Response to Examining Panels Questions

6.2. BC0410001-001023-DCO 7.5 Applicants Response to Exp's Questions Deadline 1 sets out the applicants response to the examining Panels First Written Questions. Of note is their response to the advanced manufacturing allocation (Q1.2.8) at the site in which they state “the Applicants confirm that the dDCO does not require the delivery of advanced manufacturing uses up to 20% or at all”. This indicates that there is inconsistency between what has been modelled in the TA and statements being made.

6.3. The remainder of the document includes clarifications from the applicant in which no further comment is provided.

National Highways Response

6.4. BC0410001-000960-EMG2 Deadline 1 response has been submitted by National Highways which sets out their response to the Examining Authority's Written Questions 1 (ExQ1).

6.5. NH response makes no reference to the M1 Southbound off slip and the queues anticipated to form on this approach from both the M1 and the A50. However, it is noted from the response that NH accept that the mitigation at M1 24 would assist all developments in the local plan.

6.6. In terms of the construction traffic management plan NH are happy with the contents of the document.

6.7. NH are reviewing 2 departures, although they aim to agree them, they are expecting a further 5 departures to be submitted as well as the Road Safety Audit being signed off by NH.

6.8. In regard to the potential issue of severance, NH had no comment although this is something they are keen to address in other applications.

6.9. In response to comments on highway works and the Applicant’s mitigation, NH explained “that in recognition of the need for a series of significant interventions at Junction 24 to mitigate the impact of the growth in the area, and to avoid a suboptimal piecemeal approach, a consortium of developers (including the Applicant, the owner of the power station, the proposed developers of a new village and other landowners) has been working on a strategic solution to address the forecast congestion at the junction. A design (which incorporates the Applicant’s proposed SRN mitigation) has been proposed to enable growth to come forwards, and work is under way to demonstrate that the proposed design is operationally effective through traffic modelling.”

6.10. NH has been involved in the discussions with the consortium and agrees that the mitigation proposed by the Applicant could in due course form part of a wider strategic solution for the junction. While mitigation / junction modelling for the whole strategic solution is not yet agreed, the Applicant’s work at J24 could support it. NH noted that the Applicant’s scheme helps eliminate forecasted congestion and there would be residual issues without the scheme.

6.11. The above states that the mitigation scheme has been developed to allow for all local development to come forward and not just the DCO application. Whilst the scheme being submitted as part of the DCO application is not the whole scheme it does form a significant part of it. There has been no

evidence presented to suggest that a smaller scheme could address the issues created by the development traffic.

6.12. In summary, NH appear to have accepted a development and associated mitigation schemes but it is not clear if they have received additional information to be able to do this as the evidence provided to the examination does not provided enough information to allow the interested parties of this DCO process to be satisfied with the work undertaken.

Leicestershire County Council Response

6.13. BC0410001-000872-EMG2 LCC Written Representations Deadline 1 has been reviewed which outlines the current position from LCC.

6.14. On traffic and transport, LCC describes extensive engagement since 2022 through a Transport Working Group. LCC notes that the DCO application has evolved (to include an additional 100,000 sqm of mezzanine floorspace) and raises concern about the Applicant's approach to the assessment of this impact and an associated DCO requirement, which LCC does not agree is enforceable.

6.15. LCC welcomes supplemental testing using post-covid transport modelling (PRTM 2023) but reserves its position pending submission and outcomes.

6.16. LCC is generally content with elements of highway design on the Local Road Network, subject to final modelling and formal submission of drawings.

6.17. LCC seeks safeguarding of land along the EMG2 main site frontage with the A453 for future dualling.

6.18. LCC raises specific active travel and Public Right of Way concerns.

6.19. LCC requests that the Applicant identifies funding mechanisms for travel plan and public transport measures (preferably via a s106 agreement).

7.0 NORTH WEST LEICEISTSHIRE DISTRICT COUNCIL (NWLDC)

7.1. The next comments are in relation to comments provided by North West Leicestershire District Council with the information contained in BC0410001-000904-Examining Panel - First Written Questions.

7.2. As stated by NWLDC it has been requested that the applicant demonstrates the 20% advance manufacturing is acceptable based on current assessment.

7.3. NWLDC want land on the A453 to be safe guarded for future dualling to allow developments like Isley Woodhouse. Plus modelling is being undertaken at present to assess what infrastructure would be required for these developments.

7.4. NWLDC feel a free bus pass should be provided for 6 months and not 1 week, to encourage more sustainable travel

8.0 DESIGN AND CONSTRUCTIBILITY REVIEW

8.1. As part of the review the scheme has been reviewed from a design and constructability perspective, a summary of the findings is listed below, and the detailed analysis is provided in the following text.

- The departure from standards have been agreed eleven with two further exceptions still to be agreed, only six were identified in the RSA.

- The RSA identified a lack of information regarding the bridge associated with the M1 A50 link road.
- WCHAR audit was referenced however, this is not available for review.
- The TA modelling was not provided to the audit team and as such the mitigation was not reviewed against the modelling outputs.

Transport Evidence Informing the Design

8.2. The transport data underpinning the scheme has not been finalised or agreed. In the absence of agreed baseline traffic data and mitigation testing, no confidence can be placed in the operational performance or safety of the proposed highway arrangements.

Compliance with Design Manual for Roads and Bridges (DMRB)

8.3. Key documents required to demonstrate compliance with the Design Manual for Roads and Bridges have not been provided to the Examination. The applicant has not demonstrated that the highway proposals comply with the required national standards.

Departures from Standard (GG101)

8.4. The documentation lacks clarity and consistency regarding departures from standard. The number of departures identified varies across submitted documents, with additional departures shown on drawings but not included within the formal schedule. Of particular concern is a stopping sight distance departure based on an incorrect object height, significantly understating the safety risk.

Road Safety Audit Stage 1 (GG119)

8.5. The submitted Stage 1 Road Safety Audit is non-compliant with GG119. No approved audit brief has been provided and the audit confirms that not all design information was assessed. As such, the audit is invalid.

Environment Agency – Bridge and Environmental Matters

8.6. The Environment Agency has raised concerns relating to bridge foundations, flood risk, ground conditions, biodiversity and waste. Insufficient information has been provided to allow proper assessment of these matters.

8.7. In its current form, the submission does not provide sufficient certainty that the proposed development would be safe, compliant with national standards, or capable of implementation without unacceptable risk. Substantial further work is required before these matters can be resolved.

8.8. Further detail to support the above comments are detailed below.

8.9. To proceed with design, it is essential that the supporting transport infrastructure is defined against the transport data agreed (which is yet to happen) and therefore assessment of the design cannot be progressed. If the Transport data was complete, the proposed design should be compliant with relevant standards and supported by complete and accurate technical evidence. This would assist in defining that the scheme was operationally sound and safe. We have no evidence that this has been completed.

8.10. At this time the data provided does not provide confidence that this is the case and we have detailed below our key concerns.

Item 1 – Transport Approvals into Design

8.11. The Traffic and Transport work is currently incomplete and as such the design proposed from it can therefore not be comprehensive and correct.

Item 2 – Design Guidance Requirements

8.12. Local and National Guidance on highway design process and principles are set out on the Design Manual for Roads and Bridges. This structures how works on Local Authority and Trunk Roads should be planned and designed. The information provided is currently incomplete and documents, which are central to this process have not yet been provided. It should be noted that it is the designers responsibility to confirm compliance to this guidance and with the current information provided, we cannot confirm that compliance has been achieved.

Item 3 – Walking Horse Riding and Cycling Assessment (WHCHAR) GG142

8.13. A WHCHAR is a mandatory requirement for all National Highway schemes. At this time a WHCHAR has not been provided in the DCO portal and therefore we a cannot assess if the procedure has been followed and the subsequent provision for vulnerable users has been assessed and provided.

Departures from Standard – GG101

8.14. Departures from standard are the mechanism where noncompliance of design is assessed and agreed by both Local and National highway asset owners. It is noted that within the DCO the importance of clarity on the departures is key to the approval of this scheme, as neither party has the ability to amend or deny approval of these at a later date.

8.15. The general process for a departure from standard is detailed below.

Summary of Departures from Standard in GG 101 – Introduction to the Design Manual for Roads and Bridges

8.16. It is normal practice that Departures are approved in principle at planning to provide improved safety assessment of a scheme. Road Safety Audit Briefs should include all departures from standard.

Definition of Departures

8.17. A departure is a variation or waiving of a requirement in accordance with Overseeing Organisation procedures. Bulk departures apply when the same non-standard method or material is used in multiple locations.

Statutory Requirements

8.18. Departures cannot be applied to statutory or legislative requirements, which must always be followed.

When a Departure is Required

8.19. A departure must be submitted where requirements are not met, and should be submitted where a requirement is inappropriate, would cause adverse consequences, proposes innovative methods, replaces existing requirements, or addresses aspects not covered.

Approval Requirements

8.20. All departure applications must be approved before design finalisation and before inclusion in the works.

Bulk Departures

8.21. Where multiple similar departures exist, bulk departures are preferred.

Aspects Not Covered by Requirements

8.22. If no requirement exists, a specific departure application for the aspect must be submitted

Interactions with Local Roads

8.23. Where works will be adopted by a local authority, departures must still follow the Overseeing Organisation's procedure.

8.24. **Non-compliance Identified Post-Construction**

8.25. non-compliant works must be rectified. In England, retrospective departures may be permitted once all alternatives are exhausted.

8.26. **Relaxations**

8.27. Relaxations are only permitted where explicitly stated. Variations beyond limits require a departure.

Deviation from Recommendations

8.28. Departures do not apply to recommendations; however, deviations require written justification including cost/time/resource comparison and safety risk assessment.

Safety Risk Assessment

8.29. All deviations from recommendations require a safety risk assessment.

8.30. Our main concern on this process is we are unclear from the data provided that all departures have been captured by the design team and where possible mitigated first through redesign. Some of these items it is felt that with powers to CPO land that land could have been included in the scheme to remove these departures and therefore improved safety of operation for the proposal.

8.31. If these cannot be designed out of the scheme and the reasoning for the departures are sound, then these should submit at planning for consideration and approved in principle. We do not have evidence and in fact we have contradiction to the statements currently made that these are approved.

8.32. What we currently know from the data provide by the applicant is;

8.33. The DCO submission has identified several issues regarding compliance with established design standards. Transport Assessment Document BC0410001-000530-DCO 6.6A contains the most applicable information related to compliance with design standards. This document identified a total of 18 Departures from Standards (DfS) including:

- 12 geometric departures relating to CD 116, CD 122, CD 127, and CD 195
- 8 signing-related departures associated with CD 146

8.34. Additional departures referenced in the report (paragraphs 4.48 and 4.60) have not been clearly documented or submitted for review and approval.

8.35. A further 12 departures are shown on drawings (pages 119–129) that are not included within the formal DfS schedule, raising concerns regarding completeness and transparency.

8.36. One of these DfS is related to Stopping Sight Distance (SSD) on drawing EMG2-BWB-HGN-M1NBS-DR-H-0110. This identifies an 8m shortfall against a 195m requirement under CD 109. However, the object height used (1.05m) is inconsistent with CD 109 (which specifies 0.26m), suggesting that the actual SSD deficiency may be significantly greater than stated.

8.37. We have assessed the basic data provided and additional undocumented departures have also been identified beyond those listed above.

8.38. Finally, we note that the RSA 1 references 6 departures which doesn't align with any of the numbers above and provides further confusion.

8.39. These issues collectively raise concerns regarding the robustness of the design and whether all departures have been properly identified, assessed, justified, and approved.

Item 5 – Road Safety Audit Stage 1 – GG119

8.40. The Road Safety Process is a key part of assessment of safety of operation of a proposed highway scheme.

8.41. Road Safety Audit – Stage 1 Procedure – GG119 Purpose of a Stage 1 RSA A Stage 1 Road Safety Audit is undertaken at the completion of preliminary design to identify safety issues early.

8.42. It is assumed that to progress with an RSA 1 that National Highways or the Local Authority will need to agree the scheme is ready to proceed to Audit.

8.43. Once this is provided the following staged process should be followed.

- Confirm Need for RSA & Prepare the Audit Brief The audit brief includes scheme description, preliminary design drawings, constraints. This audit brief must be signed and approved by National Highways to be valid.
- Appoint an Independent RSA Team At least two trained auditors independent from the design team, these should be preapproved by National Highways prior to any audit being conducted.
- Familiarisation & Document Review, design drawings, context, and supporting info focusing on design principles.
- Site Visit Understand constraints and road user behaviour, by undertaking a site visit.
- Identify Potential Safety Problems List hazards, conflicts, visibility issues, and provide recommendations.
- Prepare the Stage 1 RSA Report includes scheme details, problems, recommendations, and plan extracts.
- Design Organisation Response Report Responses to each problem with acceptance or risk-assessed rejection.
- Approval & Implementation Overseeing Organisation approves actions, prioritising highest risk.
- Record Keeping & Progression to Stage 2 Archive documentation and proceed to detailed design stage.

8.44. Based on the above the following task are incomplete in the data provided, which makes the audit invalid.

8.45. Task 1, no brief has been provided for the audit. In addition to this, the data provided for the audit does not appear to be complete and the Audit itself references this. On this basis the Audit cannot be approved, as it is missing information for consideration.

8.46. Below is the extract from the RSA 1, which details the Auditors comments on the completeness of the audit.

8.47. Items 1.7 is the key points around the number of departures considered in the audit and contradicts the departures listed above.

8.48. Item 1.8 goes further to say that some of the design information provided has not been considered at all, therefore without assessment of all of the data the audit cannot be completed.

1.7 There are a number of departures from standard, which are listed in the Audit Brief which are set out below for ease of reference. These are yet to be submitted and agreed;

- M1 Northbound – Departures from standard have been identified with respect to the northbound weaving length (from J23A), the number of lanes in the weaving section, spacing of successive diverges, layout of new A50 diverge, the visibility into the new A50 diverge and positions of signs and signals.
- M1NB-A50WB Interchange link – Departures from standard have been identified with respect to the cross-section being a single lane, a reduction in crest K below desirable minimum, reducing the bridge clearance over the A453 by 2 feet (as it is an 18' high load route not a 20' route; note clearance will be in excess of the minimum for a standard route).
- M1 J24-A50WB interchange link – Departures from standard have been identified with the A50 westbound merge with the visibility on the A50 exit from the J24 roundabout being below desirable minimum and the provision of a lane drop.
- M1 Junction 24 - Departures from standard have been identified with the M1 J24 NB exit slip and entry path curvature onto the roundabout.
- EMG1-EMG2 Active travel link - Set back from carriageway less than 1.5m in specific locations.
- A453/EMG2 Site access junction – Lane width in excess of 4.5m on EMG2 exit due to swept path.
  L57 Footpath – Gradients in excess of 7% for approximately 50m.

1.8 It should be noted that no details have been provided to the Audit Team in terms of the structure of the bridge provided on the new A50 link over the A453. As a result, the bridge itself has not been considered as part of this Stage 1 Road Safety Audit.

8.49. As Task 1 of the audit process has not been followed, then we believe the audit is invalid and incomplete. In addition, it is recognised that a designer's response has been produced in response to the road safety audit. As the road safety audit is not complete then the designer's response cannot be completed, therefore any design suggestions or comments made cannot be relied upon until the audit is completed.

Item 6 – Environment Agency Bridge Comments

8.50. Further concerns raised by the Environment Agency include requirement for piled foundations, Flood Risk Assessment, ground conditions, biodiversity, and waste.

8.51. Assessment of the proposed bridge structure and could not be undertaken due to a lack of provided information.

9.0 CONCLUSION

9.1. It can be seen from the modelling assessment there are some key questions being raised regarding the mitigation being proposed (or not as the case may be) and the extents of the modelling to ensure all scenarios have been addressed, i.e. modelling rerouted traffic or ensuring one junction doesn't have a detrimental impact on another junction. It is felt that there are significant gaps in the data to allow an informed decision to be made on whether the development is acceptable from a highway's perspective.

9.2. It should also be noted that the no alternative mitigation seems to have been considered, ideally the reports should show an iterative process as to how they have dealt with the capacity issues identified as part of the modelling process.

9.3. The lack of key data with respect to the modelling work and the questions surrounding the mitigation, it can be concluded that the mitigation schemes cannot be agreed at this time. As such the road safety audits and departure from standards processes cannot be completed.

APPENDIX 2

RESPONSE TO THE APPLICANT'S COMMENTS ON EMA AND EMIAL'S RELEVANT REPRESENTATION
(REP-051D Appendix 5)

APPENDIX 2

RESPONSE TO THE APPLICANT'S COMMENTS ON EMA AND EMIAL'S RELEVANT REPRESENTATION (REP-051D Appendix 5)

EMA/EMIAL does not recognise SEGRO's characterisation of the engagement between the parties.

Early Engagement (2020-2022)

From 2020 through to Summer 2022, there were exploratory conversations with SEGRO from both a property and land promotion perspective. These exploratory conversations related in large part to the promotion of the land south of the A453 through the local plan process, before the creation of the Freeport and were without reference to any potential later use of compulsory purchase powers.

The conversations were by their nature exploratory because, until Summer 2022, the Freeport and any allocations to support it were little more than just 'prospects'. It was not until March 2021 when the Freeport was announced and only in Spring 2022 when the business case was approved by HM Treasury.

Because there was no Freeport and given the early preliminary nature of the discussions, MAG employees involved were not authorised to negotiate terms for a disposal of land prior to 2022, when the freeport came into being. As such, they were not contractual discussions in relation to the sale of the land from EMA/EMIAL's perspective, but preliminary discussions. This was made clear to SEGRO at that point in time. As such, the early conversations can only be characterised as "art of the possible and collaborative discussions" only and not negotiations for sale.

It is also fair to observe that EMA is an airport operator and this period of early engagement between the parties fell squarely at the height of the COVID-19 pandemic, one of the most challenging periods for aviation businesses in modern memory. The priority of the business during this period was on recovery of the operational aviation business and less on wider commercial property investment and land promotion, nonetheless EMA did engage through this period, despite the difficulties faced by the main business.

SEGRO's assertion at appendix 5 paragraph 1.8 of REP-051D DCO 7.2 Applicant's Response to Relevant Representations that the submission to the NWL Call for Sites process was submitted by SEGRO alone is incorrect. EMA/EMIAL supported the promotion of the jointly owned land south of the A453 through the local plan process. The submitted document shown at **Appendix 2A** clearly shows it was a joint proposal by SEGRO and EMA/EMIAL on independently owned land. This can be seen on the cover page and throughout the document. The ExP's attention is particularly drawn to the paragraph 01.2 and 06.11 which deal with the promotion and deliverability by two parties, the clear ownership plan on page 6 and the deliverability of two 'halves' of the site on page 7 separated by Hyam's Lane (which is supplemented by the site constraints plan on page 9). It is simply wrong, therefore, for SEGRO to state that it was their document alone or that EMA was in some way 'reluctant' to be public facing.

Further Engagement prior to February 2024

EMA/ EMIAL and SEGRO worked collaboratively during this period to achieving a local plan site promotion and a deliverable Freeport site, demonstrated by the above joint submission to the NWL call for sites, and EMA/EMIAL entering into a 6 month period of exclusivity in Summer 2022, where the discussions moved from preliminary to contractual in nature. Following the 6-month period of exclusivity, a formal offer was presented by SEGRO with Heads of Terms in November 2022 but after scrutiny and a recommendation from the MAG Property team, MAG board deemed the offer to be unacceptable and not reflective of the interests of its shareholders. This offer was therefore rejected on that basis. In EMA's view, SEGRO did not make any reasonable attempt to acquire the land by negotiation prior to the making of the section 35 direction on 21 February 2024. This can be seen by the fact that SEGRO's offer in August 2024 was materially over the amount it offered in December 2022. On SEGRO's own actions, therefore, MAG was right not to accept the offer.

Engagement post February 2024

On 21 February 2024, the Secretary of State made the section 35 direction for the authorised development including EMA/EMIAL's land, without EMA/EMIAL's knowledge.

Having commenced preparation in Spring 2023, MAG (and by extension EMA/EMIAL) submitted its planning application on 3 June 2024 and simultaneously conducted a process of formally procuring a development partner for its own development on the land south of A453. As SEGRO's previous offers had not in MAG's opinion reflected the true value of the land and the relationship had deteriorated following the making of the s35 direction, SEGRO were not initially invited to take part in that process. SEGRO did nevertheless make a final offer in Summer 2024. It did not however have Board or Investment Committee approval and therefore the offer was not deemed credible by MAG Board.

EMA/EMIAL's impression is that SEGRO has sought to make just enough contact to establish a chain of correspondence it can refer to in an attempt to demonstrate to the ExP and the SoS that it has made all reasonable efforts to acquire the land by negotiation. In EMA/EMIAL's view, these efforts have been consistently shown to be below market value and uncompetitive or otherwise made without proper authorisation following a deterioration of commercial relationships and so do not meet the necessary standard of what may constitute a reasonable effort.

In conclusion, SEGRO have not engaged proactively or competitively throughout this process. It is also the case that until recent weeks, no meaningful conversations have been had on any form of joint venture or collaboration between the parties – even after Prologis/EMA's relevant representation which made clear the various options which had not been explored by SEGRO. Whilst we welcome the dialogue, it is considered very late in the day and at the current time we are continuing to work through possible options.

APPENDIX 2A

SUPPORTING STATEMENT FOR NWLDC ‘CALL FOR SITES’

LAND TO THE SOUTH OF EAST MIDLANDS AIRPORT AND SOUTH-EAST OF M1 J23A

Submitted on behalf of SEGRO and East Midlands Airport

October 2020

umc architects

DeltaPlanning

MAG East Midlands Airport

SEGRO

CONTENTS

CALL FOR SITES

CALL FOR SITES

01 INTRODUCTION

01.1 North West Leicestershire District Council has commenced a Substantial Review of its Local Plan. A key evidence base document which will inform the preparation of this Review will be the Strategic Housing and Employment Land Assessment (SHELAA). The 'Call for Sites' has been issued as part of the latest update of the SHELAA to ensure it contains the most up to date evidence on potential land supply.

01.2 This statement has been prepared in response to North West Leicestershire Council's 'Call for Sites'. It is submitted on behalf of East Midlands Airport (EMA) and SEGRO who are working together to promote land to south of the airport as a location for additional strategic employment growth.

THE OPPORTUNITY

01.3 The site provides a unique opportunity for employment growth given its strategic location immediately south of the airport, west of the M1 and in close proximity to the East Midlands Gateway with its rail freight terminal.

01.4 The strength of this location has been recognised in the Leicester and Leicestershire Strategic Growth Plan (SGP) and is also closely aligned with the Local Enterprise Partnership's emerging proposals for a freeport.

01.5 The vision for the site is to create a first-class development of the highest environmental standards that will attract new high-quality businesses to this outstanding location.

SCOPE OF STATEMENT

01.6 This statement accompanies the completed 'Call for Sites' Form and provides further information on the following:

- Description of the site
- Outline of relevant planning policy context
- Information on the development partners
- Description of the vision for the site
- Analysis of site opportunities and constraints and key aspects of mitigation strategy
- Summary and conclusions

WIDER SITE CONTEXT PLAN

CALL FOR SITES

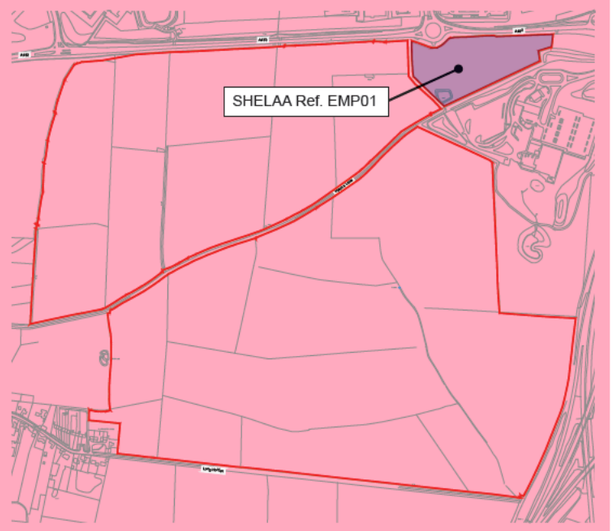
02 THE SITE

02.1 The site extends to approximately 100ha and currently comprises undeveloped agricultural land.

02.2 The site is bounded to the north by Ashby Road (A453) with East Midlands Airport beyond. Donington Park Services is located immediately adjacent to the north-east. To the east lies the A42 and the M1. To the south the site is bounded by Long Holden and to the south west is the village of Diseworth.

02.3 The wider area contains the Airport and associated infrastructure, together with SEGRO's East Midlands Gateway development, a major regional logistics park which is now 50% occupied, and a fully operational rail freight interchange.

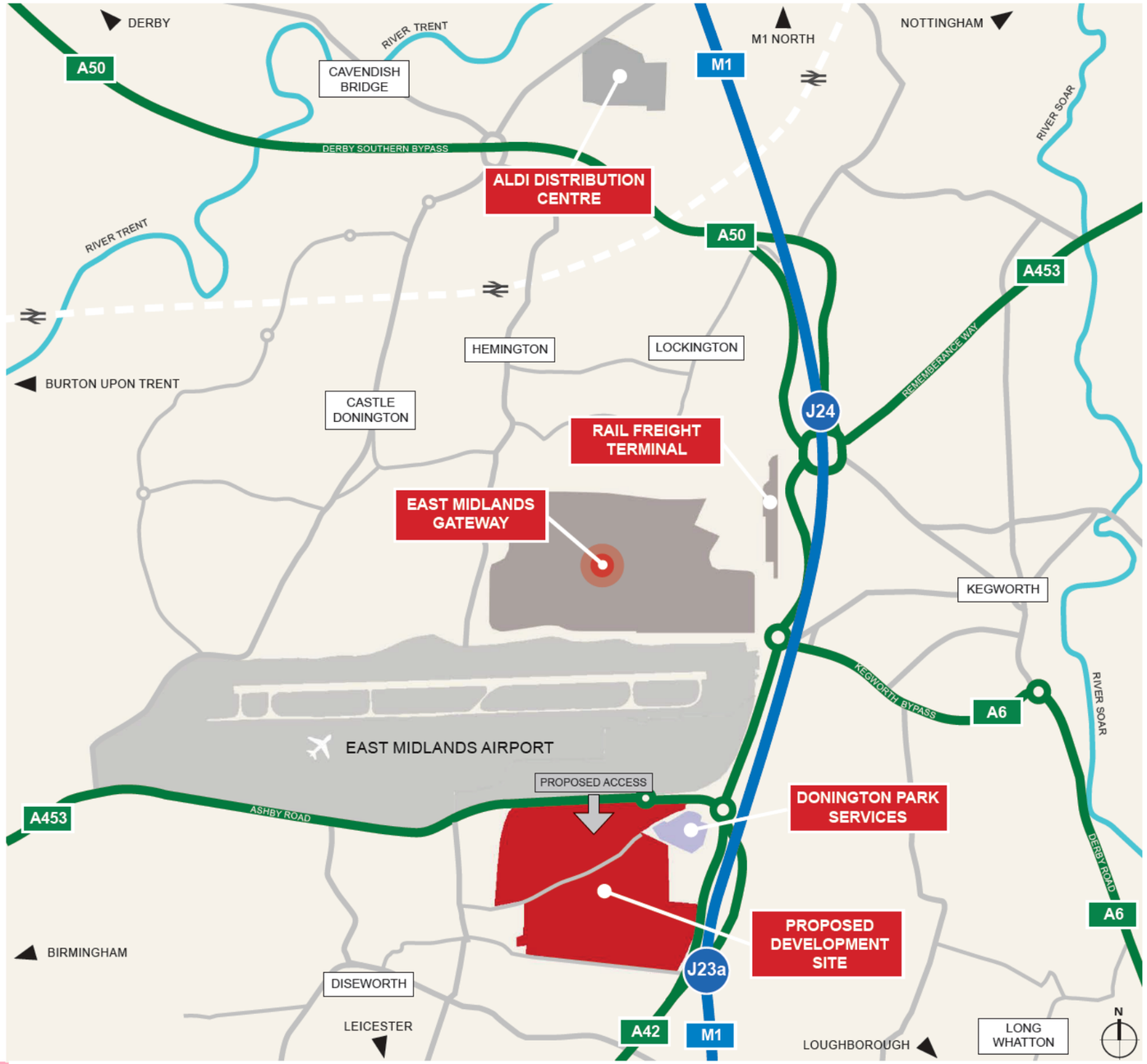
DEVELOPMENT BOUNDARY PLAN



Development Boundary

Parcel of land identified in the 2019 SHELAA

LOCAL MAP



03 PLANNING POLICY CONTEXT

STRATEGIC GROWTH PLAN (SGP)

03.1 The SGP has been prepared by ten partner organisations in Leicester & Leicestershire including North West Leicestershire District Council to provide a long-term vision to guide the growth of the area to 2050. The strategy is to be delivered through the individual Local Plans of the partner authorities.

03.2 The SGP specifically identifies East Midlands Airport and its immediate area as a major employment opportunity and forms part of the 'Leicestershire International Gateway' area. With regard to employment development, the SGP seeks to focus development along transportation corridors and close to important employment centres.

NORTH WEST LEICESTERSHIRE LOCAL PLAN

03.3 The Local Plan was adopted in November 2017 and sets out a strategy for delivering homes, jobs and infrastructure in the district between 2011 and 2031.

03.4 At the time of adoption, it was recognised that an early review of the Local Plan would be needed to address shortfalls in the supply of housing and employment land.

03.5 A Substantial Review is now under way, which will tackle the employment and housing land requirement shortfalls. To inform the review, the Council is undertaking this 'call for sites' and is also continuing to update its evidence base.

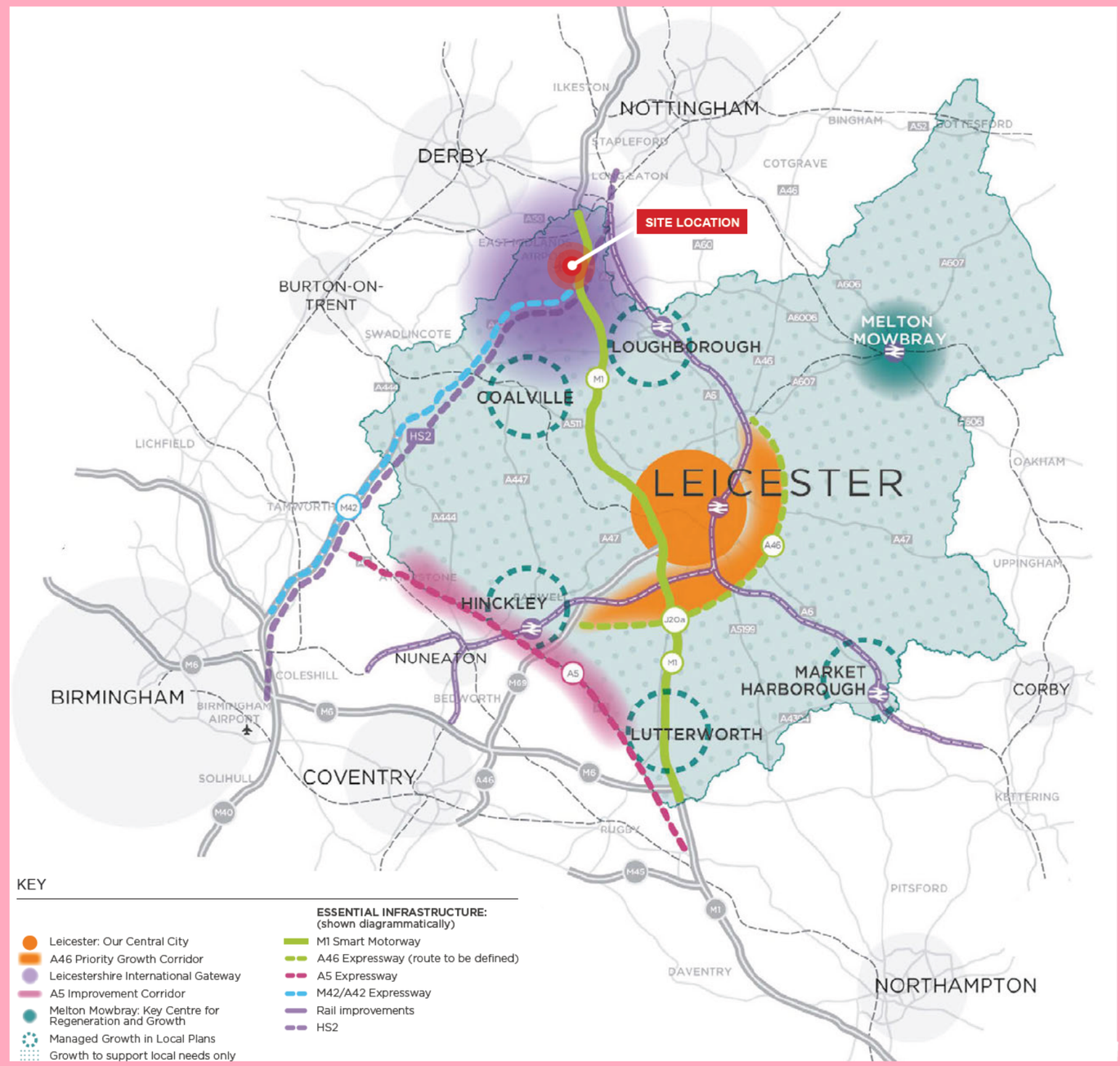
LEICESTER AND LEICESTERSHIRE HOUSING & ECONOMIC DEVELOPMENT NEEDS ASSESSMENT

03.6 The latest HEDNA was published in January 2017. Its conclusions supported the need for an early Local Plan review to address shortfalls in meeting identified needs.

03.7 With regard to strategic employment development, the HEDNA repeated the conclusion of the Strategic Distribution Sector Study that there is a need for a total of 361ha of replacement and new strategic Class B8 land for the County as a whole up to 2031.

03.8 An update to the Strategic Distribution Sector Study is currently under way.

LEICESTERSHIRE STRATEGIC GROWTH PLAN



04 THE DEVELOPMENT PARTNERS

04.1 The site is being promoted jointly by East Midlands Airport and SEGRO who already own major employment developments in the area and between them own, or are in control of the promotion of, the land south of the airport.

EAST MIDLANDS AIRPORT

04.2 East Midlands Airport is part of MAG, a leading UK airport group that owns and operates Manchester, London Stansted and East Midlands airports together with a significant property business.

04.3 East Midlands Airport is a significant regional passenger airport, handling some 5 million passengers a year. It is also the UK's major express freight hub, with significant operations from global freight operators such as DHL, UPS and FedEx. The Airport handles over 370,000 tonnes of freight a year and is second only in volumes to London Heathrow. The Airport is a major regional employer and generator of economic activity across the East Midlands.

SEGRO

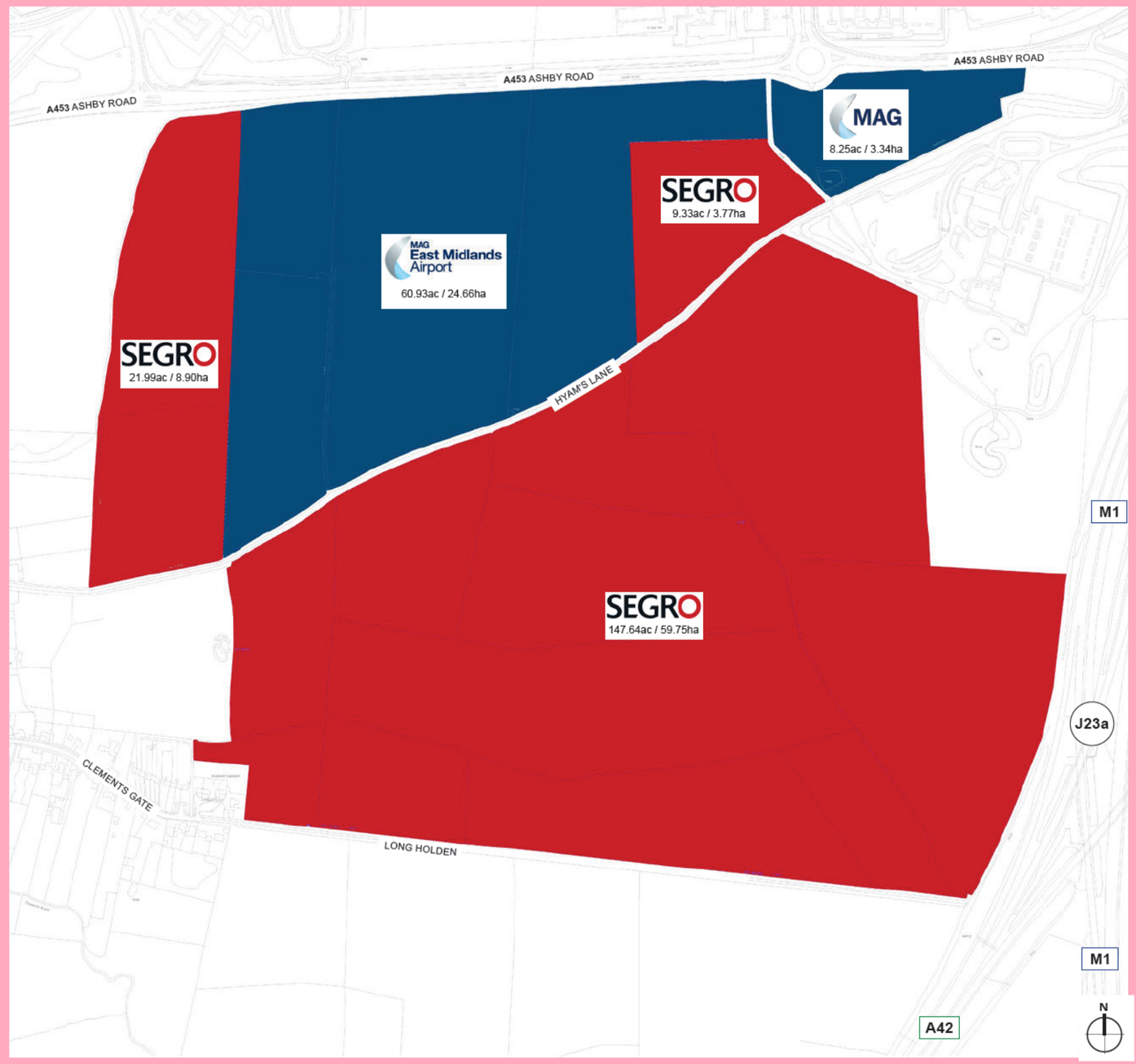
04.4 SEGRO is a UK Real Estate Investment Trust (REIT) and a leading owner, asset manager and developer of modern logistics and industrial property. It owns or manages 7.8 million sq.m. (84 million sq.ft.) of space valued at £11.7 billion serving customers from a wide range of industry sectors. Its properties are located in and around major cities and at key transportation hubs in the UK and in eight other European countries.

04.5 In North West Leicestershire, SEGRO has already delivered the first phases of its 700 acre East Midlands Gateway (EMG) development. Current occupiers at the site include Amazon, Very, XPO Logistics and Kuehne + Nagel. EMG also includes a Strategic Rail Freight Interchange (SRFI) capable of handling up to sixteen 775m freight trains per day, container storage and HGV parking.

GROWTH STRATEGIES

04.6 The land could support the creation of an East Midlands Freeport, centred around East Midlands Airport and the Maritime Rail Freight Terminal at SEGRO Logistics Park East Midlands Gateway. East Midlands Airport and SEGRO are currently supporting the D2N2 and Leicestershire LEPs to develop the region's freeport proposition which aims to drive inward investment, increase productivity and create high value jobs.

LAND OWNERSHIP PLAN



05 SITE VISION

05.1 This site provides an opportunity to create a first class development of the highest quality and environmental standards that will attract and support high-quality businesses in North West Leicestershire.

05.2 It is proposed to bring the site forward as a strategic employment site with a mix of employment uses. Technical work is ongoing, but an initial development concept has been prepared which demonstrates that the site is capable of accommodating a range of plot and building sizes with a potential total floorspace of up to 300,000 sq.m.

05.3 Access to the site would be taken off the A453 which provides a direct route to the strategic road network (A42 and M1) and links the site with the wider employment developments to the north and the existing air and rail freight facilities at East Midlands Airport and East Midlands Gateway.

05.4 The key elements of the proposal are summarised as:

- Potential for up to 300,000 sq.m. of new employment floorspace further strengthening North West Leicestershire as a strategic employment location;
- Provision of a range of building sizes to accommodate market demands from both manufacturing and logistics occupiers;
- Potential to support around 4,000 jobs and make a significant contribution to both the local economy and to that of the wider region;
- Potential to support wider economic strategies including the establishment of a Freeport and the plans for an East Midlands Development Corporation;
- To follow principles of 'great place-making' with high quality buildings set in a managed high-quality landscape environment including significant landscape buffers and green corridors;
- Development designed to protect residential amenity and minimise visual and landscape impacts;
- To secure the highest standards of sustainability and embedding effective sustainable transport measures throughout;

SITE PARAMETERS PLAN

06 MITIGATION AND DELIVERABILITY

06.1 As with any development site, there are a range of environmental and technical considerations that need to be considered as part of any development allocation. The following section of this document identifies the principal aspects that will need to be considered together with potential mitigation strategies, although this list is not exhaustive at this stage.

TRAFFIC AND TRANSPORTATION

06.2 The site lies immediately to the south of East Midlands Airport and is extremely well connected by road to both the local area and wider afield via the A453, M1 and A42.

06.3 The site and surrounding area are already well served by public transport and are connected to the surrounding area by pedestrian and cycle routes. The focus of the development partners will be on delivering a sustainable transport strategy to strengthen sustainable transport options to the area and achieve a significant modal shift towards sustainable travel.

06.4 A full and detailed transport assessment will be undertaken as part of any masterplanning process for the site to ensure all transportation matters are fully considered and appropriate mitigation put in place. The key highway infrastructure requirement will be off the A453 and this access corridor will be fully assessed and an upgrade/mitigation package put in place to ensure traffic from any development can be fully and safely accommodated on the network.

LANDSCAPE AND VISUAL

06.5 Given the site’s proximity to the airport to the north and the M1 corridor to the east, in landscape terms the site will form an extension of this wider employment and infrastructure area which will provide a good degree of containment.

06.6 To the south west of the site however lies the village of Diseworth with its village centre Conservation Area. The protection of the setting of this village and heritage asset will be a key requirement of planning the site with particular attention given to providing a strong boundary landscape framework including a large green buffer along the western and south-western boundary of the development. This is indicatively shown on the development concept plan.

ECOLOGY

06.7 The principles of Biodiversity net gain will be central to any development strategy and masterplanning for the site. The site is currently in agricultural use with hedgerows and trees dividing the various fields. These habitats will be assessed and important features integrated into the proposals wherever possible. There are no nationally or locally designated wildlife sites on the site, although the site does fall at the edge of the impact zone of the Oakley Wood SSSI. All ecological effects will be fully assessed and impacts fully mitigated. This will ensure that a high-quality network of blue and green infrastructure is provided that will secure net biodiversity gain.

FLOOD RISK AND DRAINAGE

06.8 The site is located within Flood Zone 1 and is therefore at low risk of flooding.

06.9 As with any development of this scale, detailed proposals will have to be developed in due course to accommodate the necessary foul and surface water drainage, and detailed strategies to address any impacts will be required. The principles of sustainable urban drainage systems (SUDS) will be incorporated into any design.

GROUND CONDITIONS

06.10 The site has historically been used for agriculture and there are no known contamination or ground suitability restrictions to its development.

LAND OWNERSHIP

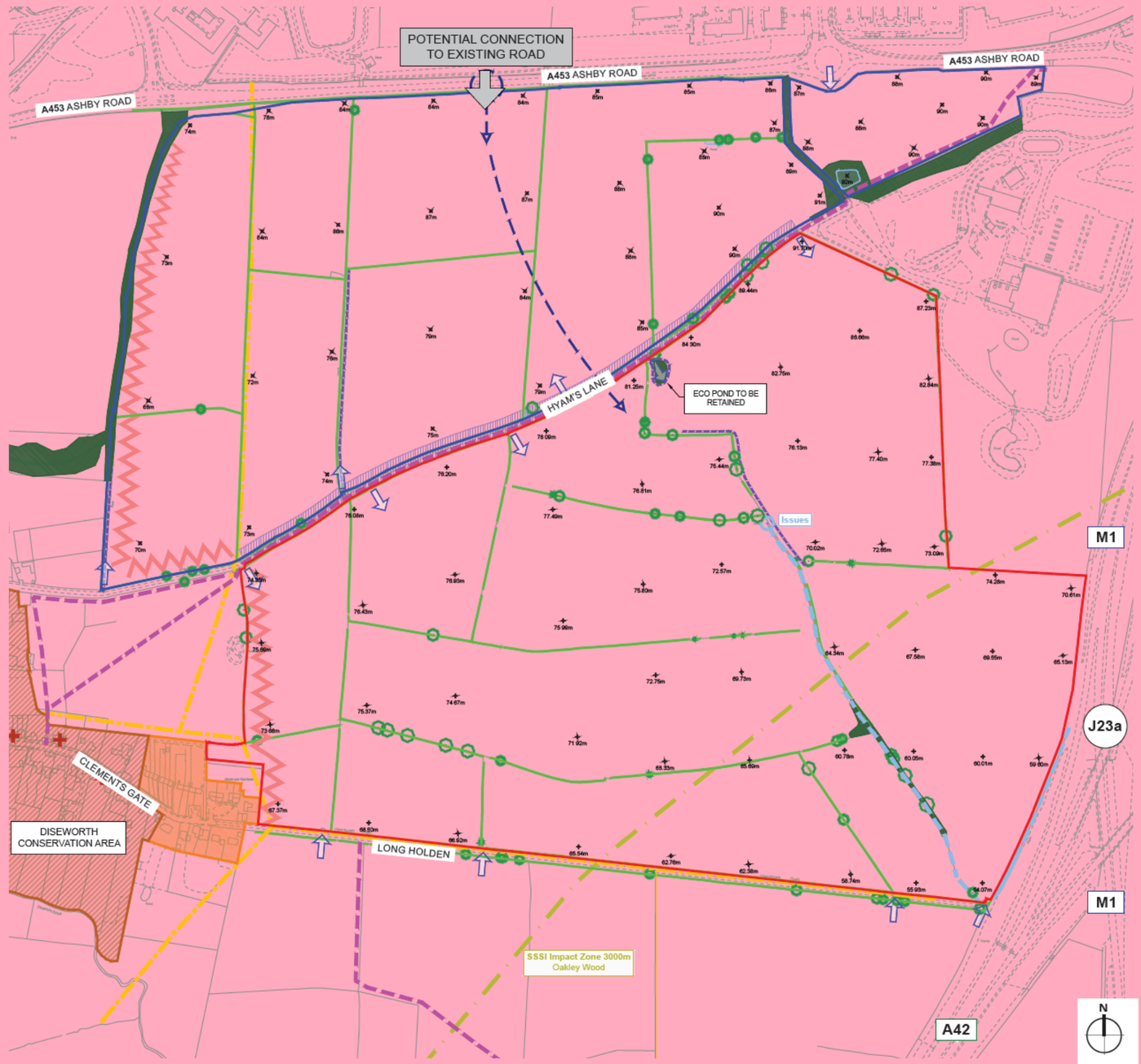
06.11 The site is being jointly put forward for consideration through the Local Plan by the land owners and promotion partners East Midlands Airport and SEGRO and can therefore be considered to be available and deliverable. Between them the partners have delivered significant employment facilities in North West Leicestershire and have a wealth of experience in bringing forward proposals of this size and nature.

06 MITIGATION AND DELIVERABILITY

SITE CONSTRAINTS PLAN

KEY

- South Site Boundary: 147.64 Acres (59.75 Hectares)
- North Site Boundary: 100.47 Acres (40.66 Hectares)
- Drain
- Public Right of Way
- Track
- Overhead Powerlines 11kV
- SSSI Impact Zone 3000m Oakley Wood
- Existing Hedgerows
- Existing Trees
- Existing Vegetation
- Residential
- Conservation Area
- Listed Buildings
- 70.61m Existing Spot Heights (from Greenhatch drawing 34529_T_REV 0)
- 74m Existing Spot Heights (from Google Earth)
- Existing Site Access
- Sensitive Boundary
- Potential Road Connection
- Potential Road Improvements



07 SUMMARY AND CONCLUSIONS

07.1 This document has been prepared on behalf of East Midlands Airport and SEGRO to support the promotion of land to the south of the airport for strategic employment growth through the Substantial Local Plan Review.

07.2 The proposal site extends to approximately 97 hectares and currently comprises agricultural land. It lies immediately to the south of East Midlands Airport and associated commercial areas and would form a southward extension of this existing built area.

07.3 The site is immediately available and deliverable. There are no known technical or land ownership constraints. An initial development concept for the site has been prepared and shows that the site could accommodate a range of employment uses with a total potential floorspace of some 300,000 sq.m which could support around 4,000 jobs.

07.4 It is considered that the site presents a unique opportunity for employment growth given its strategic location to the south of EMA and EMG and excellent road access and proximity to air and rail freight facilities.

APPENDIX 3

LIST OF OUTSTANDING INFORMATION – TRAFFIC AND TRANSPORT

APPENDIX 3

LIST OF OUTSTANDING INFORMATION – TRAFFIC AND TRANSPORT

ITEM	ISSUE	CONCERN
1	LACK OF INFORMATION	The review of the Transport Assessment and other accompanying documents did not provide a traffic flow model for the base or the base plus development traffic. This makes it difficult to understand the level of traffic that was anticipated at each junction and on each arm of those junctions.
2	LACK OF INFORMATION	There is no explanation of significant differences between the 2019 and 2023 modelling, particularly on the M1 SB and off slip and A50 approach.
3	LACK OF INFORMATION	Junction 6 - M1 Junction 24 Mitigation has been provided on the approaches, the circulatory carriageway and on the approach to the junction. Due to a lack of data it is not clear if the scale of improvements on the M1 northbound off slip are proportionate to the development.
4	LACK OF INFORMATION	Junction 3 - Finger Farm Roundabout Minor mitigation is proposed due to traffic diverting to the M1 J24. However, no data is provided detailing the amount of traffic to be diverted.
5	LACK OF INFORMATION	The information provided on construction mitigation is inadequate. A CTMP has been produced in which it identifies the volume of construction traffic associated with the development of the site itself. The document sets out the mechanism by which traffic has been calculated and how this will be monitored. There is very little information in the documentation with respect to the off-site construction works for the highway mitigation measures. In particular, there is no meaningful programme for construction of those works, and no proposals to mitigate the impacts of construction during that time.
6	LACK OF INFORMATION	The WCHAR audit was referenced by the Applicant but has not been made available for review.
7	LACK OF INFORMATION	The TA modelling was not provided to the audit team and as such the mitigation cannot be reviewed against the modelling outputs.

ITEM	ISSUE	CONCERN
8	LACK OF INFORMATION	No information has been provided to show how the highway works were arrived at through an iterative process and specifically whether any less intrusive measures were considered as alternatives.
9	SAFETY	Eleven departures from standards have been agreed; with two further exceptions still to be agreed. However, only six were identified in the RSA. Confirmation is needed whether the RSA will be repeated with the correct number of departures considered.
10	SAFETY	The RSA identified a lack of information regarding the bridge associated with the M1 A50 link road. Confirmation is needed whether the RSA will be repeated with more complete information on bridge design.
11	AIRPORT OPERATIONS	Junction 2 - A463/Beverley Road Roundabout No modelling results are included for this junction so EMA is unable to satisfy itself about the future operation of the junction.
12	AIRPORT OPERATIONS	The TA does not appear to have included traffic associated with future growth of the Airport.
13	AIRPORT OPERATIONS	EMA need to understand any potential impacts to the current layout and operation of the landing lights from the Proposed Development. At present, EMA does not have sufficient information from the Applicant to satisfy itself in that respect.