

THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010
APPLICATIONS BY SEGRO PROPERTIES LIMITED AND SEGRO (EMG) LIMITED
FOR A DEVELOPMENT CONSENT ORDER AND A MATERIAL CHANGE CONSENT ORDER
EAST MIDLANDS GATEWAY PHASE 2 (EMG2)

Planning Inspectorate references: BC0410001 and TR0510002

WRITTEN SUBMISSION – DEADLINE 8

Comments on the Applicant's Deadline 7 response to Kegworth Parish Council's Deadline 6 submission, and identification of residual issues

Submitted on behalf of Kegworth Parish Council (Interested Party reference [REDACTED])

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Summary

This is a targeted response to Appendix 3 of the Applicant's Deadline 7 document DCO 7.27 / MCO 7.27 [the D7 Response], in that it does not seek to rehearse Kegworth Parish Council's (KPC) earlier submissions. However, the Council continues to rely upon its Deadline 4 and Deadline 6 cases by cross-reference, while seeking to confine this submission to what SEGRO's D7 Response newly says, what it leaves unresolved, and how the Examining Panel is respectfully invited to treat the remaining evidential gaps. In doing so, this approach aims to follow the Examination timetable and the Government's examination guidance.¹

The D7 Response materially advances the Applicant's case on only two matters. First, it explains Savills' treatment of e-commerce and identifies a sensitivity excluding the e-commerce uplift. Secondly, it provides the net employment figures and the scheme-wide displacement allowance previously requested. The Council acknowledges both advances. *They do not, however, establish the scale or location-specific need for EMG2; reconcile the Icen and Savills methods; test occupier-specific relocation and the return of vacated floorspace; or demonstrate that the claimed benefits are additional rather than redistributed.*

On alternatives, the Applicant relies on the emerging Regulation 19 allocation of EMP90 and its earlier justification. That is a circular argument in a DCO promoted in parallel with, and ahead of, the independent examination of the Local Plan. *It does not cure the absence of a transparent like-for-like alternatives exercise or the Council's concern that Freeport status has been used as a site-selection premise rather than tested as one consideration among others.*

On highways, the response continues to lean heavily on 'common ground' agreements with National Highways and earlier documents, while *leaving unanswered the counter-intuitive southbound off-slip result, underlying model transparency, the practical cumulative outcome, the adequacy of the 938-jobs airport proxy, local rerouting, network resilience and the physical/future constraints at Finger Farm.* These residual matters complement, and do not duplicate, Ray Sutton's Deadline 8 submission: his evidence focuses on the Local Plan forecasting report, cross-boundary redistribution and a monitor-and-manage safeguard; this submission addresses the Applicant's answers to KPC and the evidential and decision-making consequences.

On viability and compulsory acquisition, agreement of National Highways protective provisions resolves the former negotiation issue, *but it does not retrospectively show that the viability appraisal tested the final cost package. The Applicant's reliance on the absence of a further ExP request is not evidence of viability.*

KPC respectfully submits that the untested residual uncertainties bear directly on need, alternatives, environmental effects, deliverability and whether there is a compelling case in the public interest for compulsory acquisition. Taken cumulatively, the Applicant has in our view not provided a sufficiently robust and justified case for approval to be granted.

1. Purpose, procedural basis and scope

1.1 This submission comments on material received at Deadline 7, as expressly permitted at Deadline 8. It responds principally to Appendix 3 of DCO 7.27 / MCO 7.27, the Applicant's

¹ Planning Act 2008: Guidance on the examination stage of an application (GOV.UK, updated 3 July 2026), paras 2.8, 3.13 and 3.16: contributions should assist the inquisitorial process without unnecessary restatement; repetition adds no weight; later targeted responses may address matters arising in other parties' submissions.

Response to Deadline 6 and 6a Submissions [the D7 Response], which addresses KPC's Deadline 6 submission [REP6-090].²

1.2 KPC understands and respects the instruction that earlier points need not be repeated because repetition carries no additional weight. Government guidance nevertheless recognises that a later written response may address another party's submissions on matters already raised. Accordingly, KPC adopts and relies upon REP6-090 and its earlier submissions without restating them. The purpose here is to identify:

- (a) matters now answered;
- (b) matters answered only in part;
- (c) matters answered through cross-reference or agreement with another party without resolving KPC's point; and
- (d) matters not answered.³

1.3 KPC also acknowledges Ray Sutton's separate Deadline 8 submission. That paper uses the May 2026 LCC North West Leicestershire Local Plan Forecasting Report, and subsequent LCC evidence, to examine cumulative and cross-boundary highway consequences. It concludes that EMG2-only mitigation should not be treated as resolving all wider operational consequences and invites consideration of a monitor-and-manage mechanism. KPC supports that approach. Sections 5.5–5.8 below cross-refer to it whilst avoiding duplication of its technical route to the conclusion presented.

1.4 KPC's position remains one of respectful assistance to the Panel. It recognises that the Panel must reach its own planning and legal conclusions. Where an issue remains disputed, KPC does not ask the Panel simply to substitute the Council's assertion for the Applicant's. It asks the Panel to test whether the evidence is adequate to support the finding required for approval and, where it is not, to withhold the weight claimed or treat the uncertainty adversely in the planning balance.

2. Response audit: what has and has not been answered

Issue	Status	What D7 adds	Residual gap
Need methodology / e-commerce	Partly addressed	New Savills explanation and no-uplift sensitivity; Icení reservations admitted.	No reconciliation of numerical outputs, location-specific requirement or transparent sensitivity result.
Net additionality / Maersk	Partly addressed	25% displacement; c.3,000 net on-site and 6,185 net on/off-site project jobs identified.	Generic allowance replaces occupier/site analysis; reoccupation is asserted; gross/net labels remain potentially confusing.
Alternatives / Freeport / plan-led route	Not substantively answered	Earlier case and Regulation 19 EMP90 allocation relied upon.	Allocation is not adopted or independently examined; no like-for-like alternatives matrix; provenance and circularity remain.

² Examining Panel, Rule 8 letter and Examination timetable, 18 March 2026, Annex A, item 18: Deadline 8 is for comments on submissions received at Deadline 7, comments on accepted additional submissions, and further information requested under Rule 17; deadline 23:59 on 9 September 2026.

³ Planning Act 2008 examination-stage guidance, paras 3.13 and 3.16. Paragraph 3.13 permits a new matter where necessary to respond to another party on an issue already raised; paragraph 3.16 describes later written responses as targeted submissions addressing matters as they arise.

Issue	Status	What D7 adds	Residual gap
M1/A50 southbound off-slip	Only partly addressed by cross-reference	Earlier Applicant and NH responses cited; lower PRTM 2023 baseline offered.	Why mitigation lengthens queues and the 2019/2023 divergence remain unexplained; model files not provided.
Cumulative scenarios	Only partly addressed	A/B scenario rationale explained; future schemes to provide their own mitigation.	No secured holistic package or demonstration that EMG2 does not constrain later mitigation; known cumulative failure persists.
Airport growth baseline	Not answered on substance	938 jobs said to be stakeholder-agreed; 2038 said to be correct horizon.	Agreement is not validation; no passenger/cargo trip-end test or clear treatment of on-airport cargo.
The Green / local rerouting	Not answered on substance	Applicant disputes EMFM result and calls bypass the proper strategic route.	No quantified reassignment, village-route assessment, monitoring trigger or enforceable response.
Resilience / incidents	Not assessed	Formal diversion routes and NH incident role cited.	No stress test; operational diversion does not show informal rerouting or network performance.
Finger Farm	Only partly addressed	REP6-046D sensitivity and peak-hour rationale cited.	No answer on geometric/future phasing constraint; daily/HGV concern narrowed but not eliminated.
NH sums / viability / CA	Only partly addressed	Protective provisions and sums now agreed; EMG2 works self-funded.	No appraisal rerun using final costs; absence of ExP request is not evidence; wider-package risk remains.

Table 1. KPC audit of Appendix 3 of the D7 Response. “Partly addressed” means that the response supplies relevant information but does not dispose of the point made.

3. Need and economic additionality

3.1 What KPC accepts has been addressed

3.1.1 The Applicant has responded in considerably greater detail to KPC’s e-commerce point. It explains that Savills excludes the exceptional Covid years 2020–2022, compares pre-Covid and post-Covid trends, uses absolute online sales rather than penetration alone, and has undertaken a sensitivity excluding the e-commerce uplift. KPC accepts that this is a substantive response and no longer suggests that the Savills method simply projects the pandemic spike.

3.1.2 The Applicant has also supplied the scheme-wide figures KPC requested: a 25% displacement allowance; approximately 4,000 gross on-site jobs reduced to approximately 3,000 net on-site jobs; and 6,185 net additional on- and off-site jobs for the EMG2 Project overall. It explains that 5,720 relates to the DCO scheme only. This substantially answers the request for identification of the gross/net arithmetic, although the wording in Appendix 3 itself (“6,185 net additional on-site (ie 4,000 jobs) and off-site jobs”) is not entirely lucid!

3.2 What remains unresolved on the scale and location of need

3.2.1 The new response confirms that Savills has reservations about Icen’s gross-completions methodology and regards its own suppressed-demand methodology as more appropriate. That is important. The Applicant nevertheless says the methodological differences do not materially affect the conclusion because Icen’s NWL figure is broadly consistent with the lower end of Savills’ range. It does not provide, in Appendix 3, the numerical bridge that would permit the Panel to

understand why two materially different methods converge, which assumptions explain the range, or what floorspace remains justified after the no-e-commerce sensitivity.

3.2.2 Evidence of significant demand somewhere within NWL or the wider FEMA is not the same as evidence that the full EMG2 quantum is required at EMP90 now. The examples of appeal decisions elsewhere demonstrate that Savills' method has been accepted in other factual and policy contexts; they are not a substitute for demonstrating the location-specific proposition in this Examination. Likewise, rapid take-up at EMG1 is relevant market evidence, but it does not by itself distinguish latent unmet demand from relocation, constrained supply, consolidation or demand that could be met at other allocated or Freeport sites.

3.2.3 The Applicant's answer therefore addresses the e-commerce mechanism but not the Council's central scale-and-location question. KPC respectfully invites the Panel to treat the evidence as supporting a general need for strategic logistics floorspace, but not, without the missing numerical reconciliation and spatial apportionment, as establishing an overriding and immediate need for the whole of EMG2 at this location.

3.3 Displacement, relocation and reoccupation

3.3.1 A standard 25% displacement factor is a legitimate appraisal device, but it is not the same thing as testing the unusually relevant facts identified by KPC. The Applicant has relied on occupier interest as evidence of immediate need; the most prominent example, Maersk, is already at EMG1. Once occupier interest is deployed as site-specific evidence of need, it is not satisfactory to dismiss any examination of its relocation implications as speculative while retaining the occupier interest as evidence in favour.

3.3.2 The proposition that another occupier would be expected to take a vacated EMG1 unit is plausible, but it is an assumption rather than an evidenced outcome. Net absorption across a wide FEMA between 2014 and 2023 does not establish the timing, suitability or additionality of reoccupation of a particular large unit. If it is reoccupied, that may support market strength, but it also demonstrates that a relocation can generate two counted occupancies without two equivalent additions to economic activity. *The correct planning question remains the net additional benefit attributable to EMG2.*

3.3.3 KPC asks the Panel to apply only such weight to the employment and economic benefits as the generic 25% allowance and the disclosed arithmetic can bear, and not to attach separate or enhanced weight to named occupier interest unless its relocation and vacancy consequences are consistently accounted for.

4. Alternatives, Freeport status and the plan-led route

4.1 Reliance on the Regulation 19 allocation does not cure the circularity

4.1.1 The D7 Response does not repeat the Applicant's alternatives justification and instead relies on its earlier material and on EMP90's inclusion in the Regulation 19 Local Plan. KPC accepts that a proposed allocation is a material consideration. It is not, however, an adopted development-plan allocation and has not yet passed independent examination. It cannot, without circularity, be treated as proof that the very site promoted through this parallel DCO is the only genuinely comparable and deliverable alternative.

4.1.2 The distinction drawn by the Applicant—between an alternatives exercise for a Local Plan and one for an Environmental Statement—is real but does not answer KPC's point. Different legal exercises may apply different tests; both still require a rational evidential basis. Reliance on Freeport/airport/EMG1 proximity as a defining screen excludes locations that cannot possess those attributes, while reliance on the resulting EMP90 allocation then confirms the same conclusion. Neither step demonstrates what environmental or operational trade-offs arise under a consistent set of criteria.

4.2 Residual decision-making consequence

4.2.1 KPC does not of course ask the Panel to conduct the Local Plan examination. It asks it not to treat a proposed allocation, or a Freeport boundary not selected through a planning alternatives process, as discharging the Applicant's burden to justify the chosen land and compulsory acquisition. The absence of a structured, transparent and like-for-like comparison remains material to whether alternatives have been properly considered and whether interference with land interests is necessary and proportionate.

4.2.2 The Panel is respectfully invited to give limited weight to the assertion that no comparable alternative exists, and to recognise that the emerging plan-led process is evidence of a realistic mechanism by which need and alternatives can be tested together. If the Panel cannot conclude from the Examination record that the preferred site and extent have been robustly selected, that uncertainty weighs against consent and against the compelling-case test for compulsory acquisition.

5. Traffic, cumulative effects and network resilience

5.1 Agreement with National Highways and the southbound off-slip

5.1.1 The Applicant again refers to its earlier response and to National Highways' position, adding that PRTM 2023 produces different results because baseline flows are lower than in PRTM 2019. KPC accepts that agreement with the strategic highway authority is important evidence. It is not, however, conclusive of a planning judgement, nor does it explain the particular result challenged: why the modelled mitigation increases the M1/A50 southbound off-slip queue in the relevant scenario, why the magnitude differs so sharply between model vintages, or whether the longer queue can extend to the M1 mainline.

5.1.2 Saying that the overall conclusion is unchanged is not an explanation of the result. Nor does agreement give KPC or the Panel the ability to test an unexplained output where the underlying model files or equivalent transparent audit trail are unavailable. The residual issue is therefore not whether National Highways has signed an agreement; it is whether the evidential basis permits the Panel itself to reach a reasoned conclusion on safety and severe cumulative impact.

5.1.3 KPC invites the Panel to record that this counter-intuitive result remains unexplained and to avoid relying on the conclusion alone. If the Panel cannot be satisfied that queues will not reach the mainline, or that the mitigation is robust to reasonable baseline assumptions, it should treat the highway evidence as insufficient for approval.

5.2 Scenario A/B and the unresolved cumulative outcome

5.2.1 The Applicant explains that the A scenarios include draft Local Plan allocations, EMIP and Ratcliffe without their as-yet-undetermined mitigation, while the B scenarios isolate EMG2. That explains the construction of the tests. It does not resolve their planning significance. The A scenario identifies a foreseeable cumulative outcome; the B scenario identifies the marginal impact of EMG2. Both are relevant, but they answer different questions.

5.2.2 The assertion that each later development will be assessed and required to mitigate its own impact does not provide a secured holistic package now. It assumes that later schemes will have physical, financial and procedural capacity to repair an outcome after EMG2 and its junction geometry have been fixed. Compatibility with unspecified future works is asserted, not demonstrated by an agreed design, delivery body, funding mechanism, trigger or land strategy.

5.2.3 This is where Sutton's separate evidence is directly relevant. His Deadline 8 submission demonstrates, through LCC's Local Plan Forecasting Report and the continuing LCC position, that interventions on the SRN redistribute traffic onto the LRN across authority boundaries and that satisfactory cumulative operation remains dependent on a wider package not before this

Examination. KPC relies on that analysis rather than repeating it here. It supports the narrower conclusion that an EMG2-only “*no unacceptable impact*” finding must not be translated into a determination that the foreseeable cumulative operational consequences have been resolved.

5.3 East Midlands Airport growth and cargo

5.3.1 The Applicant says the additional 938 airport jobs were supplied by NWLDC, agreed with stakeholders and used for the joint EMG/Prologis application. That explains provenance and consistency; it does not validate adequacy. KPC’s point was that airport passenger and cargo growth generate trips by mode, time and purpose, and cannot safely be reduced to a single employment proxy without showing the relationship between the proxy and the airport’s permitted or reasonably foreseeable throughput.

5.3.2 The answer that 2050 lies beyond the 2038 assessment year is also incomplete. KPC did not suggest that every model must run to 2050. It asked whether the 2038 baseline properly captures growth already permitted or reasonably foreseeable by that year, and whether new on-airport cargo floorspace and HGV generation are included. Appendix 3 does not answer the latter question or provide a passenger/cargo throughput sensitivity for 2038.

5.3.3 KPC invites the Panel not to treat stakeholder agreement on an input as a substitute for evidence that it represents airport growth robustly. In the absence of a transparent trip-end or sensitivity test, the airport baseline remains an uncertainty concentrated at the very junctions on which the residents living in Kegworth rely.

5.4 The Green, the Kegworth Bypass and local rerouting

5.4.1 The D7 Response states that increases forecast by EMFM 2019 are not expected in reality and that increased use of the A6 Kegworth Bypass is appropriate because it is a strategic route. Neither proposition quantifies where traffic deterred by queuing at The Green goes, how much uses village or rural routes, or what happens when the strategic routes are constrained.

5.4.2 Whether the bypass is an appropriate route is separate from whether its junctions and adjoining community experience unacceptable delay, severance or secondary reassignment. The response does not offer a local-route monitoring boundary, threshold, trigger or funded remedial mechanism. This unresolved point aligns with, but is not duplicated by, Sutton’s evidence that LCC continues to identify LRN effects in Kegworth and Castle Donington and favours monitor-and-manage.

5.5 Resilience and incident conditions

5.5.1 The Applicant says incident modelling is neither typical nor reasonable, identifies National Highways’ incident-management role, and points to formal diversion routes along the A453 and A50 that do not pass through Kegworth. KPC accepts that a Transport Assessment is not normally required to simulate every collision or closure. The concern is strategic resilience: a nationally significant 24/7 logistics cluster is being concentrated around closely interacting junctions, and the response assumes that signed routes describe actual behaviour and available capacity during disruption.

5.5.2 Formal diversion planning is not an assessment of network performance. It does not test informal sat-nav rerouting, simultaneous constraints, HGV interaction, or the consequences for Kegworth when the designated parallel route is itself affected. Sutton’s examples concerning A6006 disruption illustrate why cross-boundary resilience is a real operational issue, not a request to model a particular accident.

5.5.3 KPC invites the Panel to treat the absence of a proportionate resilience stress test as a residual limitation. At minimum, that supports the monitoring, trigger and remedial approach proposed by LCC and advanced in Sutton’s submission.

5.6 Finger Farm

5.6.1 The Applicant points to REP6-046D and Table 3, which it says show improved morning-peak journey times and queues with mitigation. It also explains that office trip rates for EM Point are a traffic-generation worst case and that the network peaks are the busiest hours. KPC accepts that these points answer part of its request and narrows its concern accordingly.

5.6.2 Two matters remain. First, an office profile may produce the highest aggregate peak flow, but that does not necessarily test HGV-specific operational effects, turning behaviour or off-peak resilience at a roundabout serving a 24/7 logistics cluster. Secondly, Appendix 3 does not answer KPC's physical point: how the additional arm and pedestrian-crossing stage affect the scope for future signal-phasing or geometric mitigation under the full cumulative load. "Included in the model" is not the same as demonstrating future adaptability.

5.7 The proportionate safeguard

5.7.1 KPC therefore endorses, without duplicating, Sutton's invitation that the Panel consider a monitor-and-manage mechanism. Such a mechanism should, if consent is otherwise contemplated, identify the Kegworth/Castle Donington LRN monitoring area; baseline and post-opening surveys; traffic, queue, journey-time and HGV thresholds; review periods; an accountable body; secured funding; and enforceable remedial measures. It should also address the interaction between Junctions 23A, 24 and A50 Junction 1 and the A6 Kegworth Bypass.

5.7.2 This is not a request that EMG2 fund all future development. It is a request that consequences attributable to or materially exacerbated by EMG2 and its mitigation are detected and addressed, rather than deferred on the assumption that a later promoter will be able to solve them.

6. Viability, highway costs and compulsory acquisition

6.1 What the National Highways agreement resolves—and what it does not

6.1.1 KPC acknowledges the Applicant's confirmation that National Highways' protective provisions and required commuted sums have been agreed and included in the Deadline 7 dDCO. The former live negotiation issue is therefore resolved, subject to the Panel's verification of the final drafting and sums.

6.1.2 Agreement at Deadline 7 does not establish that the viability appraisal previously relied upon incorporated the final agreed cost package. The relevant question is temporal and evidential: whether the appraisal tested the scheme that is now proposed, with the costs now agreed. A cost disagreement may have ended while its effect on an earlier appraisal remains untested.

6.2 Absence of an ExP request is not affirmative evidence

6.2.1 The Applicant says that because the Panel has not requested further viability information, none is appropriate or necessary. With respect, that reverses the evidential sequence. The absence of a Rule 17 request does not prove that the submitted appraisal incorporates final costs or remains robust. Nor can it relieve an applicant seeking compulsory acquisition powers of the need to demonstrate a viable and deliverable scheme and a compelling case in the public interest.⁴

6.2.2 KPC's request is now narrow. The Panel should establish whether the final National Highways commuted sums and the full cost of the Deadline 7 highway package are included in the appraisal relied upon. If not, it should either seek a concise updated appraisal/sensitivity or attach materially reduced weight to assertions of viability and deliverability.

⁴ Department for Communities and Local Government, Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land (September 2013), including the requirement for a compelling case in the public interest and evidence that the project is viable and has a reasonable prospect of proceeding.

6.3 EMG2-only funding does not resolve wider-package risk

6.3.1 The Applicant confirms that it will fully fund the Junction 24 works and that those works are not reliant on third-party contributions. That answers one possible delivery concern. It does not answer whether the works are sufficient under the foreseeable cumulative scenario or whether later mitigation will be physically compatible and deliverable.

6.3.2 The final sentence of Appendix 3—that no plan-led alternative is currently available that can deliver the Junction 24 works—does not establish that the DCO should be approved. It assumes the works are themselves a public benefit independent of the development that necessitates them. If the need, chosen scale, alternatives and cumulative effects are not justified, the fact that only this promoter currently offers this particular intervention cannot supply the missing justification.

7. How KPC asks the Panel to treat the residual matters

Matter	Requested treatment
Need	Recognise general logistics demand, but do not treat it as proof of the whole EMG2 quantum at EMP90; limit weight absent numerical/method reconciliation and spatial apportionment.
Economic benefits	Use disclosed net figures cautiously; do not add separate weight for named occupier interest without consistent relocation/vacancy treatment.
Alternatives	Give limited weight to the assertion that none is comparable; account for the unexamined Regulation 19 status and absence of like-for-like assessment.
Highways	Do not equate NH agreement or an EMG2-only test with resolution of the counter-intuitive model output or foreseeable cumulative effects.
Safeguards	If consent is contemplated, secure a proportionate LRN/SRN monitor-and-manage mechanism of the kind identified by LCC and Sutton.
Viability / CA	Verify final costs are included. If not, seek a sensitivity or reduce weight; treat unresolved necessity, proportionality and deliverability against the compelling-case test.

8. Overall conclusion

8.1 KPC has approached Deadline 8 by identifying movement rather than repeating position. It accepts that the Applicant has now explained Savills' e-commerce treatment, supplied a no-uplift sensitivity in principle, disclosed a scheme-wide displacement allowance and net employment totals, confirmed agreement of National Highways provisions and sums, and confirmed that it will fund the Junction 24 works. Those matters narrow the dispute.

8.2 They do not resolve its decisive elements. The Applicant has not demonstrated through transparent reconciled evidence why a general strategic warehousing need requires the whole of EMG2 at EMP90 now. It relies on a proposed Local Plan allocation and Freeport-linked criteria without curing the circularity in alternatives selection. On highways, it continues to substitute agreement, cross-reference and isolated-development logic for an explanation of adverse or counter-intuitive outputs and a secured response to foreseeable cumulative and cross-boundary consequences. On viability, the final cost package has not been shown to have been tested in the appraisal relied upon.

8.3 These are not isolated technical imperfections. They concern the principal reasons advanced for departing from the ordinary plan-led route; the choice and extent of land; the safety, capacity and resilience of the network serving Kegworth; the deliverability of mitigation; and the weight to be given to economic benefits. They also bear directly on whether there is a compelling case in

the public interest for compulsory acquisition and whether interference with affected interests is necessary and proportionate.

8.4 KPC respectfully recognises that the Panel must reach its own conclusions. On the evidence now before it, however, the Council's view is that the Applicant has not made a sufficiently robust and justified case for approval of the DCO and MCO. KPC asks the Panel to recommend refusal. If the Panel is nevertheless minded to recommend approval, KPC asks it to apply the reduced evidential weight and safeguards set out in section 7, including an enforceable monitor-and-manage mechanism, and to ensure that no finding of acceptable EMG2-only impact is treated as a finding that the wider cumulative consequences have been resolved.

Document References

- [REP6-090] Kegworth Parish Council, Deadline 6 submission: Response to the Applicant's Deadline 5 Response to KPC's Deadline 4 Written Representation.
- DCO 7.27 / MCO 7.27, Deadline 7, Appendix 3, pp.16–32: Applicant's response to Kegworth Parish Council.
- [REP6-043] Applicant's response to ExQ3, including Q15.0.2.
- [REP5-033] Applicant's response to Deadline 4 submissions, Appendix 7.
- [REP6-023] Transport Assessment.
- [REP6-046D] Further sensitivity test VISSIM modelling.
- [REP4-020] Environmental Statement, Socio-economics Chapter, including Table 5.34.
- [REP4-053] Statement of Common Ground between the Applicant and National Highways.
- [REP6-097] John Raymond Sutton, Deadline 6 submission concerning LCC's North West Leicestershire Local Plan Forecasting Report.
- John Raymond Sutton, Deadline 8 submission dated 7 September 2026.
- Leicestershire County Council, North West Leicestershire Local Plan Forecasting Report, May 2026.
- Rule 8 letter and Examination timetable dated 18 March 2026 [PD reference as published on the project page].