

**East Midlands Gateway
Phase 2 (EMG2)**

Document DCO 6.18A/MCO 6.18A

ENVIRONMENTAL STATEMENT

Technical Appendices

Appendix 18A

Leicestershire County Council Contact Log

October 2025

18

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

[SEGRO.COM/SLPEMG2](https://www.segro.com/slpemg2)

SEGRO

Note: Over the passage of time, specific table and paragraph references may have changed within various versions of the Chapter.

Table 1: Leicestershire County Council Contact Log

Details	BWB Response	LCC Comments on July 24 th 2025	BWB Response
<p><u>09/12/2024 (online meeting)</u></p> <p>BWB made LCC aware of differing scenarios that could be considered when determining the 'expansive study area.' It was explained that there is no definitive methodology for applying this, with each scenario having distinct limitations. BWB proposed an expansive study 30-mile geographical radius extending from the central study location based upon guidance from WRAP, CIRIA and DEFRA.</p>	<p><u>09/12/2024 (online meeting)</u></p> <p>LCC confirmed that the approach proposed for the assessment was acceptable in principle and requested a justification for this approach. It was also noted that this approach would introduce a transboundary element, necessitating additional consultation with neighbouring councils to ensure a comprehensive assessment.</p>	N/A	
<p><u>13/03/2025</u></p> <p>LCC provided comments to the Statutory Consultation which included commentary on the draft Waste and Materials Chapter. Their comments and BWB's responses are as follows:</p>		N/A	
<p><i>LCC did not agree a 30-mile expansive study area radius of study. 30 miles was mentioned as an example, but LCC asked that whatever radius used is supported with some form of evidence or</i></p>	<p>The 30-mile radius cited was provided following initial consultation in which LCC proposed that an isopleth (circular) radius is best suited - and is not fixed.</p>	<p>LCC welcome the further information provided which justifies the expansive study area for both materials and waste.</p>	<p>We note the comment regarding the Zone of Influence (ZOI) presented in Appendix B (now Appendix C) and its apparent similarity to Appendix A (now Appendix B). As explained in the accompanying note in Appendix C, there is currently no defined best practice for establishing a ZOI for waste within the context</p>

Details	BWB Response	LCC Comments on July 24 th 2025	BWB Response
<p><i>justification.</i></p> <p><i>The documents used as justification for a 30-mile radius in this paragraph are generic and provide no real evidence for selecting a 30-mile radius as the expansive study area.</i></p> <p><i>This Chapter needs to justify expansive study area radius for both materials and waste separately.</i></p> <p><i>Radius still needs to be agreed with LCC and with other neighbouring authorities (Nottinghamshire, Derbyshire, Staffordshire, Lincolnshire, Warwickshire and West Midlands Combined Authority).</i></p> <p><i>Whatever radius is agreed, it must be clear whether it is based on vehicle miles distance travelled or an isochrone.</i></p>	<p>In response to comments from LCC, separate justifications for materials and waste have been identified, and both distinguish whether the assessment is based on isochrone mapping or vehicle miles. Neighbouring authorities (Nottinghamshire, Derbyshire, Staffordshire, Lincolnshire, Warwickshire, and WMCA) have been invited to approve the materials and waste study area, based on regional logistics, facility catchments, and available data.</p>	<p>We acknowledge Appendix 18A: Technical Note Justifying the Expanded Study Area in Consultation with LCC (Document DCO 6.18A/MCO 6.18A) and Appendix 18C: Expanded Study Area Plan (Document DCO 6.18A/MCO 6.18A).</p> <p>Appendix A deals specifically with the ZOI (expansive study area) for waste. We agree that waste has been covered separately.</p> <p>Appendix B covers the ZOI (expansive study area for waste and materials). This seems to be almost entirely the same evidence as Appendix A and seems to be considering materials with waste.</p>	<p>of Environmental Impact Assessment. In the absence of formal guidance, the ZOI for waste has been derived from the approach used for materials, and for the purposes of continuity and simplicity, both ZOIs have been defined in the same way.</p> <p>The primary driver for this approach was to ensure the study area extended beyond the administrative boundary of Leicestershire, in line with previous requests from LCC. The ZOI boundary has therefore been drawn to approximate a 30-mile radius. However, it should be noted that this does not represent actual road distances, as calculating precise vehicle routing or road mileage would be both impractical and unnecessary for the purposes of strategic impact assessment. The ZOI serves instead as a high-level spatial framework to support the identification of potential waste and materials management infrastructure.</p> <p>This approach is consistent with the methodology previously presented and discussed. Furthermore, we take the additional and subsequent comment to conclude this approach is considered satisfactory.</p>
<p><i>States that “[This section to be completed on receipt of data from and further</i></p>	<p>At the time of the statutory consultation and preparation of an earlier draft of this</p>	<p>N/A</p>	<p>The radius has been agreed in consultation with NCC. DCC were approached but have yet to respond.</p>

Details	BWB Response	LCC Comments on July 24 th 2025	BWB Response
<p><i>consultation with LCC]".</i></p> <p><i>It is not clear what data is expected from LCC. No request has been received.</i></p>	<p>chapter it is noted that no formal data request had been made to LCC. However, information regarding local-level facility throughput and forecasted capacity has since been requested and received from LCC and incorporated into the Chapter.</p>		
<p><i>In the 'Assessment of Operational Effects' section Table 18.1 sets out the density:volume ratio for warehouse related waste during operation.</i></p> <p><i>An equivalent table should also be provided for construction and demolition related waste in the 'Assessment of Construction Effects' section.</i></p>	<p>An equivalent table for construction and demolition-related waste (CDW) has been included in the 'Assessment of Construction Effects' section. This includes waste density and volume assumptions based on the BRE SmartWaste tool and industry benchmarks.</p>	<p>Table 18.4: Typical Estimates for the Density of Construction Waste sets out density (kg/l) for waste produced during construction. Paragraph 18.5.20 addresses construction waste and this is also covered in tables 18.29, 18.30 and 18.31.</p>	<p>BWB note this response.</p>
<p><i>Sensitivity Criteria table (Table 18.6) provides criteria for just inert waste but should also provide criteria for other types of waste (e.g. commercial and industrial waste arising during the operational stage).</i></p>	<p>The table has been updated to include criteria for commercial and industrial (C&I) waste and municipal waste, in addition to inert waste, to ensure a comprehensive assessment of all relevant waste streams during the operational phase.</p>	<p>We note that Table 18.6 has been updated to include non-hazardous waste void capacity as well as inert and welcome this.</p>	<p>BWB note this response.</p>

Details	BWB Response	LCC Comments on July 24 th 2025	BWB Response
<p><i>Prior to the publication of the draft Environmental Statement the Applicant has not sought consideration and agreement from LCC on the materials and waste Chapter. Also, it has not identified what the data gaps are with which they would like support from LCC.</i></p>	<p>A draft of this Chapter was published as part of the statutory consultation and provided to LCC for review and comments.</p> <p>Since the statutory consultation, focused engagement with LCC to clarify outstanding data gaps and seek agreement on key methodological assumptions (including waste stream baselines and receptor sensitivities) has been undertaken.</p>	<p>We welcome the further engagement which has taken place with LCC since our original comments. We note the contact log included which is also helpful. We note the response which states that further focused consultation with LCC has taken place ‘to clarify outstanding data gaps and seek agreement on key methodological assumptions (including waste stream baselines, receptor sensitivities, and projected capacities)’.</p> <p>Whilst it may have been one of the discussion points, it is perhaps less true to say that much projected capacity information has been able to be given, as projected capacity is often driven by the market and unless planned for in the Local Plan, any additions could be commercially confidential whilst still in the planning process.</p>	<p>This is noted. We accept the limitations associated with this data and have amended the text accordingly.</p>
<p><i>Final bullet says available capacity data for 2020 projected forward to 2023 for landfill capacity. However, 2023 data is available from the Waste Data Interrogator so there is no need to project older data.</i></p>	<p>The most current information (2023) from the Waste Data Interrogator has since been applied and the narrative has been updated accordingly.</p>	<p>It is noted that the most current information (2023) from the Waste Data Interrogator has since been applied, and the narrative has been updated accordingly. This includes in the ‘Limitations and Assumptions’ in paragraph 18.2.50 but is also further mentioned throughout including at paragraph 18.4.12 of ‘General Waste Management Practices’ and 18.4.16 and Table 18.17 on waste</p>	<p>BWB note this response.</p>

Details	BWB Response	LCC Comments on July 24 th 2025	BWB Response
		<p>management routes with subsequent commentary in paragraph</p> <p>18.4.17. Landfill capacity from 18.4.20 onwards is also updated to 2023, as is recycling facility data for C&D waste in paragraph 18.4.26 and Table 18.21 and the Energy from Waste section and Hazardous Waste section.</p>	
		<p>Table 18.21 shows different data to the latest AMR however which shows a total of 792,655 tonnes of C&D waste received in 2023. It's not clear what the data is made up of, and more clarity is needed (e.g. removing landfills gives 406,147 tonnes).</p>	<p>We acknowledge the release of the latest AMR, which supersedes previous comments and reviews. While the dataset continues to reference 2023 data, we assume this aligns with the EA Waste Interrogator dataset. However, we are unable to determine how the reported figure of 792,655 tonnes of C&D waste was specifically derived, as no clarification has been provided.</p> <p>That said, it is important to note that both the current assessment and ours appear to overestimate waste arisings and available capacity. As such, while our figures differ, our assessment represents a worst-case scenario.</p>
		<p>Further, we welcome the acknowledgement that there is a dearth of data, as previously discussed.</p> <p>On a related note, we would suggest that paragraph 18.4.39 be amended. It appears that this is taken from Table 20 of the latest Leicestershire County</p>	<p>We welcome the additional information provided, which may not have been publicly available or explicitly detailed within the published literature or the associated EA Waste Interrogator dataset (2023). The relevant sections of our submission have been updated accordingly to reflect this feedback.</p>

Details	BWB Response	LCC Comments on July 24 th 2025	BWB Response
		<p>Council Authority Monitoring Report (AMR). These sites are not recently permitted. It would be more suitable to state that there was further capacity permitted in the 2022-23 AMR period (in table 5 of 2022- 2023 AMR), which amounted to 70,800 tonnes per annum of inert recycling capacity and non-hazardous transfer and bulking capacity respectively. Whilst other developments were permitted in the period, these did not lead to further capacity. Husbands Bosworth Quarry (2021/CM/0041/LCC), whilst primarily a minerals development, also created significant inert landfill capacity of some 1.3 million tonnes for imported inert, construction, demolition and excavation (CD&E) waste during the 2022-23 monitoring period.</p>	
		<p>Paragraph 18.4.32 states 'The calculation within Table 18.23 shows the void capacity for Hazardous waste sites for 2020 and forecasted for 2025 both at a Regional (i.e. East Midlands) and National level. In all cases the sensitivity is very high'. Should this also be 2023 rather than 2020?</p>	<p>The Paragraph has been updated from 2020 to 2023.</p>
<p><i>Table 18.11 includes cut and fill volume row, but no data is provided. Without knowing the cut and fill balance, it is unknown whether there will</i></p>	<p>The cut and fill assessments have now been completed and the resulting volumes included in the Chapter with full details contained in</p>	<p>We note that this has now been provided in new Table 18.11 and full details contained in Chapter 14: Ground Conditions and the accompanying appendices.</p>	<p>We note the inclusion of the updated information within new Table 18.11, as well as the full details now contained in Chapter 14: Ground Conditions and the accompanying appendices.</p>

Details	BWB Response	LCC Comments on July 24 th 2025	BWB Response
<p><i>need to be importation of engineering fill or exportation of excavation waste.</i></p>	<p>Chapter 14: Ground Conditions and the accompanying appendices (Appendix 14K - Document DCO 6.14K/MCO 6.14K). The balance determines whether materials will be reused on site or imported/exported.</p>	<p>Paragraph 18.5.4 seems to contradict later where it says balance will not be achieved. This seems to be in relation to EMG2 Works however so may just need clarification that this is the case. It says at 18.5.36 that 'An earthworks cut and fill assessment for EMG1 Works has been undertaken (Document MCO 6.14M). This assessment determined that there will be an approximate deficit of 37,382m³, which is not considered to provide a balanced cut and fill exercise. However, there is flexibility to reduce this deficit'.</p>	<p>With regard to Paragraph 18.5.4 (now Paragraph 18.5.50), we acknowledge the concern raised about a potential contradiction in relation to achieving balance. However, this reference pertains specifically to the EMG2 Works. As such, we consider the text to be correct but agree that a minor clarification could help avoid any misinterpretation.</p> <p>As outlined at Paragraph 18.5.36 (18.6.6), an earthworks cut and fill assessment for the EMG1 Works has been undertaken (Document MCO 6.14M). This assessment confirms an approximate deficit of 37,382m³, which does not represent a fully balanced cut and fill scenario. Notwithstanding this, there is flexibility within the scheme to reduce this deficit, as noted.</p> <p>We confirm that the cut and fill information provided in Paragraphs 18.5.50 and 18.6.6 is correct.</p>
		<p>Appendix 18D: Site Waste and Materials Management Plan (SWMMP) (Document DCO 6.18D/MCO 6.18D) – There is no Development Sequencing Plan as paragraph 3.8 says '(Document XX)'.</p>	<p>With regard to Appendix 18D (now Appendix E): Site Waste and Materials Management Plan (SWMMP) (Documents DCO 6.18D / MCO 6.18D), we note the reference in Paragraph 3.8 to a 'Development Sequencing Plan' as "(Document XX)".</p> <p>The point highlighted appears to stem from a misunderstanding by LCC that the Development Sequencing Plan was intended to be appended to the SWMMP. This was not the intention. The placeholder was included in anticipation of referencing the relevant document number once confirmed.</p>

Details	BWB Response	LCC Comments on July 24 th 2025	BWB Response
			<p>We can confirm that the Development Sequencing Plan is to be submitted as a standalone document as part of the application. The correct document number will be confirmed and the reference in the SWMMP will be updated accordingly.</p>
<p><i>Lack of reference to National Planning Policy for Waste (NPPW).</i></p> <p><i>Waste Disposal Authority Plan (2018-2030) has been superseded by the adopted Waste and Resources Strategy (2022-2050).</i></p>	<p>The National Planning Policy for Waste (NPPW) is now referenced and aligned with the assessment framework.</p> <p>The current Waste and Resources Strategy (2022–2050) has been included in Table 18.12 (Relevant Policy, Legislation and Guidance) and aligned with the assessment framework.</p>	<p>We note that this has now been corrected in new Table 18.12 and NPPW referenced, together with replacing the outdated Waste Disposal Authority Plan.</p> <p>There is reference in the table to the ‘UK’s Resources and Waste Strategy (2022-2050)’ – this seems to be a conflation of the Leicestershire County Council Resources and Waste Strategy and the national strategy. These dates do not seem right. There is the Resources and waste strategy for England, published in 2018. There is the ‘The waste prevention programme for England: Maximising Resources, Minimising Waste’ published 2023. There is also the 2024 ‘Resources and Waste Strategy: Monitoring Progress’ document.</p>	<p>We have removed the text on the row in Table 18.12 referring to the “UK’s Resources and Waste Strategy (2022-2050)” and updated the line re. “Our Waste, Our Resources: A Strategy for England 2018” in the policy table. This should resolve LCC’s query.</p>
<p><i>Table 18.14 attempts to present very different data in a single table for comparison. For example, sand and gravel is presented as annual sales, but crushed rock is</i></p>	<p>This table has been revised to ensure data consistency (e.g. using either annual sales or permitted reserves, not both) and to reflect the most recent Local Aggregate</p>	<p>We welcome that new Table 18.14 is now less confused. It should be noted however that this table shows sales for S&G and whilst it still says ‘Permitted Crushed Rock’ for Crushed Rock this data actually consists of sales as well</p>	<p>This table (now Table 18.13) has been updated as appropriate.</p>

Details	BWB Response	LCC Comments on July 24 th 2025	BWB Response
<p><i>total permitted reserves.</i></p> <p><i>It is using data from 2019 and 2020, when more recent data is available (e.g. Local Aggregate Assessments) and this should be used.</i></p> <p><i>Also, it is confusing as to whether a regional picture is being presented, or just Leicestershire.</i></p>	<p>Assessments (2021–2024). The geographical scope is now clearly identified for each data point either Leicestershire or regional, as appropriate.</p>	<p>(as referenced in the latest Local Aggregate Assessment data). We note the footnote and suggest that the word ‘Permitted’ is removed.</p>	
<p><i>Inconsistency in the number of incinerators within the 30-mile expansive study area (to be agreed).</i></p>	<p>The inconsistency in the number of incinerators has been resolved. The data table and text have been aligned and updated with the latest available information. The number of facilities are now clearly identified within the agreed study area.</p>	<p>We welcome the new Table 18.15 and accompanying text which clarifies both the study area and the number of facilities. There does however still seem to be inconsistency, as Table 18.15 states 9 facilities are ‘incineration’ and paragraphs 18.4.27 to 18.4.29 state that there are Newhurst, Widmerpool and Drakelow.</p>	<p>These paragraphs (now Para 18.5.27 - 18.5.29) have been updated to make information on incineration/EfW facilities clearer.</p>
<p><i>There appears to have been the conflation of non-hazardous Construction and Demolition (C&D) wastes and non-hazardous waste (which relates mostly to municipal waste). It is not appropriate to compare the recycling rates of one with the other.</i></p>	<p>The non-hazardous municipal waste and C&D waste have been separated, and recycling rate comparisons have been revised to reflect like-for-like waste types, using appropriate DEFRA data sets.</p>	<p>We note that ‘The non-hazardous municipal waste and C&D waste have been separated, and recycling rate comparisons have been revised to reflect like-for-like waste types, using appropriate DEFRA data sets’. It is true to say that the commentary on waste streams including at paragraphs 18.4.13 to 18.4.19 on Construction Waste and subsequent sections such as Landfill Capacity and Recycling Facilities is now clearer in its reference to different waste streams. Associated tables are also clear on streams. The</p>	<p>We have considered feedback and amended the table to make it clearer.</p>

Details	BWB Response	LCC Comments on July 24 th 2025	BWB Response
		exception to this is Table 18.17 which although clarified in the text at paragraph 18.4.16 that it refers to C&D waste, still refers to Inert and Non-Hazardous Waste (Tonnes) in the column title.	
<p><i>This table (Table 18.17) should list the waste facilities in the 30-mile expansive study radius, not just Leicestershire.</i></p>	<p>The table has been updated to include facilities from all relevant areas within the proposed expansive study area, not just Leicestershire. Each facility is listed with its waste type specialism and location (where this information exists).</p>	<p>We welcome new Table 18.17, which is now simply a capacity by the three counties in the study area by waste management route and waste type, rather than by individual sites and their location. This seems sensible.</p>	<p>BWB note this response.</p>
<p><i>It's not clear what waste streams are being used for the waste quantities set out in Table 18.14 (e.g. does it include non-hazardous municipal waste, C&D and Commercial & Industrial (C&I), or a selection of these streams). Also, it is not clear why 2022 data has been used, when more recent 2023 data is available.</i></p>	<p>2022 data has been used where 2023 data is unavailable. The table has been updated to clarify which waste streams are included (municipal, C&I, and C&D).</p>	<p>It is still unclear why inert and non-hazardous waste have been grouped together, however We note this has been updated. We note new Table 18.15 sets out the number of Waste Management Facilities within the Study Area and the following tables 18.16 and 18.17 which provide recycling percentages.</p>	<p>We have clarified the proportion of this waste expected to be inert and non-hazardous. However, as noted above, there remains a discrepancy between our figures and those provided by LCC in relation to the quantity of inert construction and demolition (C&D) waste received by waste transfer and treatment facilities, as shown in the updated Table 18.18.</p>
<p><i>Makes reference to 76.7% of waste in Leicestershire being diverted from landfill and compares this against an England wide rate of 90%. However, the 90% seems to</i></p>	<p>The comparison with national performance is provided given the EMG2 Project is considered 'Nationally Significant'.</p>	<p>We note the response 'The comparison with national performance is provided given the EMG2 Project is considered 'Nationally Significant'. The comparison has been revised to ensure consistency between waste</p>	<p>We acknowledge the feedback regarding the presentation of inert and non-hazardous waste within a single column and appreciate the opportunity to clarify this point.</p> <p>While inert and non-hazardous waste are recognised as distinct waste streams, it is not</p>

Details	BWB Response	LCC Comments on July 24 th 2025	BWB Response
<p><i>refer to C&D waste and 76.7% to a mix of waste streams. It makes the comparison meaningless.</i></p>	<p>The comparison has been revised to ensure consistency between waste types (e.g. comparing C&D diversion in Leicestershire with national C&D diversion rates only). Any potential mixed comparisons have been removed.</p>	<p>types (e.g. comparing C&D diversion in Leicestershire with national C&D diversion rates only). Any potential mixed comparisons have been removed.' It is still unclear however as to why the table shows both Inert and Non- Hazardous Waste as one column as they are two very different streams.</p>	<p>considered necessary to separate them within the main EIA chapter. This is because the assessment is focused on identifying potential significant effects associated with overall construction waste arisings, capacity, and management, rather than assessing impacts at the level of specific waste classifications. Presenting the data in a combined format allows for a more streamlined and proportionate assessment within the context of the EIA.</p> <p>That said, in response to the feedback, we have reviewed and updated the supporting information to provide a breakdown of the waste composition, including separate figures for inert and non-hazardous waste where appropriate. This additional detail is now reflected in Table 18.16, to ensure clarity and transparency.</p>
<p><i>In regards to Table 18.19, only landfill capacity in Leicestershire has been considered. It is missing for other authorities within whatever expansive study area is identified and agreed.</i></p>	<p>Since publication of the draft chapter, the table has been expanded to include landfill capacity for all authorities within the defined study area. Sources have been cited from relevant regional and local waste plans.</p>	<p>We note new Table 18.19 has been expanded to include landfill capacity for all authorities within the defined study area (LCC, Notts and Derbyshire). Sources have been cited from relevant regional and local waste plans. We would however question the figures for non- hazardous landfill remaining in Leicestershire.</p> <p>The LCC area has one non-hazardous landfill (Shawell) which is indicated (under the name Cotesbach) as having 10,603,925 cubic metres remaining at</p>	<p>We can confirm that the remaining capacity figure for the non-hazardous landfill at Shawell (referred to as Cotesbach), as reported in the latest AMR (10,603,925m³ at the end of 2023), has already been included in the updated Table 18.18. As such, no further action is required.</p>

Details	BWB Response	LCC Comments on July 24 th 2025	BWB Response
		the end of 2023 in the latest AMR (EA figures).	
<p><i>Table 18.21 appears to be a partial representation of recycling facilities predominantly within Leicester City rather than the County. In addition, some identified sites are irrelevant for a Rail Freight Interchange (e.g. Household Waste Recycling Sites).</i></p> <p><i>Furthermore, no facilities have been considered in the expansive study area outside of Leicestershire (e.g. Derbyshire, Nottinghamshire).</i></p>	<p>Since publication of the draft chapter, the table has been revised to exclude irrelevant facilities (e.g. HWRCs) and include appropriate commercial waste processing and recycling infrastructure across the broader study area, including Derbyshire and Nottinghamshire.</p>	<p>We note new Table 18.21 which is now purely waste received in 2023 at C&D Recycling Facilities. This seems reasonable, although there is now no indication of which facilities are included.</p> <p>We note the comment that ‘Since publication of the draft chapter, the table has been revised to exclude irrelevant facilities (e.g. HWRCs) and include appropriate commercial waste processing and recycling infrastructure across the broader study area, including Derbyshire and Nottinghamshire.’</p> <p>Table 18.24 needs checking against the latest AMR. This appears to be a reproduction of the capacity in the 2023 LCC AMR. Some of these sites within the AMR would not take waste from EMG2 (e.g. Kings Hill Cremations)! Therefore the figure of 182.5 tonnes for ‘disposal (not landfill)’ column would not be relevant.</p>	<p>We note the comment regarding the updated Table 18.21, which now presents waste received in 2023 at construction and demolition (C&D) recycling facilities. This approach is considered reasonable within the context of the Environmental Impact Assessment (EIA), as the primary focus is on assessing potential impacts, rather than preparing a detailed waste and materials management plan. As such, identifying individual facilities is not ordinarily considered necessary at this stage.</p> <p>However, we acknowledge the feedback and, to improve transparency, we have included a footnote to Table 18.20 listing the facilities that contribute to the dataset.</p> <p>We acknowledge the comment regarding Table 18.24 (now Table 18.22) and the need to check its alignment with the latest LCC AMR. The table was intended to provide a high-level overview of available disposal capacity based on published figures. We recognise, however, that some of the facilities listed in the AMR—such as Kings Hill Cremations—would not be relevant for waste arising from the EMG2 Works.</p> <p>Given the nature of the EIA and the limitations of the available data, the assessment did not go into detailed site-by-site filtering. Nonetheless, we appreciate LCC’s detailed review and, in response, have removed the</p>

Details	BWB Response	LCC Comments on July 24 th 2025	BWB Response
			182.5 tonnes attributed to 'disposal (not landfill)' from the assessment to avoid potential misrepresentation.
		On a related note, paragraph 18.2.8 seems to contradict the earlier affirmation that Derbyshire CC is now included as it says: 'To date, no response has been received'.	BWB are unclear as to which "earlier affirmation" LCC is referring to. We received a response from Derbyshire County Council (DCC) on 24 July 2025, offering a meeting on 28 July. However, given the timing, it was not feasible to arrange the meeting and incorporate any resulting comments into the chapter. Paragraph 18.2.9 has been updated to reflect this position.
<i>In reference to Paragraphs 18.5.20 and 18.5.22, figures provided in these paragraphs do not reflect the figures in the tables that immediately precede them.</i>	Since publication of the draft chapter, figures in the text have been updated to align precisely with those in the tables. Any discrepancies due to rounding or outdated figures have been resolved.	We note the response that 'Since publication of the draft chapter, figures in the text have been updated to align precisely with those in the tables. Any discrepancies due to rounding or outdated figures have been resolved'. This seems to have been resolved.	BWB note this response.
<i>In reference to Sections 18.6, 18.7 and 18.8, all include notes which say: "section to be completed".</i>	Since publication of the draft chapter, these sections have now been completed, incorporating the outcomes of the impact assessment, mitigation strategy, and residual effects in line with the updated methodology and agreed study area.	This appears to have been resolved. All have been updated and no longer include 'section to be completed'.	BWB note this response.
<u>28/03/2025</u> A Technical Note was issued to LCC which provided a justification for the proposed	The Technical Note is presented in Appendix 18A .	N/A	

Details	BWB Response	LCC Comments on July 24 th 2025	BWB Response
expansive 30-mile study area for the assessment.			
<p><u>02/04/2025 (online meeting)</u></p> <p>BWB provided justification for the proposed expansive 30-mile study area.</p> <p>BWB raised the difficulty in establishing the existing and future capacity for waste facilities within the expansive study area due to EA Waste Data Interrogators not setting out this data.</p>	<p>LCC confirmed they were satisfied with the justification for the proposed expansive 30-mile study area with respect to waste but requested further justification for the 30 mile study area with respect to minerals.</p> <p>LCC confirmed they are aware of the dearth of available data on existing and future capacity. They suggested using whatever information is set out within local and county level waste plans and annual monitoring reports.</p>	N/A	
<p><u>02/04/2025 (email)</u></p> <p>The Technical Note was updated to expand on the justification for the proposed expansive 30-mile study area for the minerals assessment.</p>	<p><u>03/04/2025 (email)</u></p> <p>LCC confirmed that the justification provided for the minerals assessment was acceptable. The updated Technical Note is provided in Appendix 18B.</p>	We welcome the Updated Technical Note in Consultation with LCC (Appendix 18B). This provides added clarity on matters of agreement and of methodology, especially in relation to data limitations and zone of influence.	BWB note this response
<p><u>02/04/2025 (email)</u></p> <p>Correspondence from BWB to LCC confirming the lack of available data on existing and future waste facility capacity, and requesting any</p>	<p><u>04/04/2025 (email)</u></p> <p>LCC confirmed they would inquire on the availability of data requested and will issue any relevant data to BWB. Additional information was</p>	N/A	

Details	BWB Response	LCC Comments on July 24 th 2025	BWB Response
available information for relevant facilities within Leicestershire.	subsequently provided by email on 30/04/2025.		

Table 2: Leicestershire County Council Non—Statutory Consultation Comment and Response

New Comment Received from LCC as part of Non-Statutory Consultation in July 2025	BWB Response
<p>Table 18.19 shows different data to the latest Leicestershire County Council Authority Monitoring Report (AMR). It is unclear where this data is from. The latest AMR shows (sourced from EA WDI) that in Leicestershire 11,986,390 cubic metres of capacity were remaining at the end of 2023. The latest AMR shows 10,624,145 cubic metres of non- hazardous landfill capacity remaining.</p>	<p>Both our assessment and that of LCC are based on the most recent version of the Environment Agency’s Remaining Landfill Capacity spreadsheet. We note that LCC report a total inert landfill capacity of 11,986,390m³ in Appendix 2 of their latest AMR.</p> <p>However, it appears that one operational site—Woolfox Quarry, which accepts inert waste and has a reported capacity of 373,525m³—may not have been included in LCC’s calculation. No justification for its exclusion is provided in the AMR and we are unclear as to why.</p> <p>For completeness, and to reflect the full range of available capacity, our figure (now presented in Table 18.18) includes Woolfox Quarry, resulting in a total inert landfill capacity of 12,359,915m³.</p>