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Harborough Local Plan Examination

Matter 4 Statement

Iceni Projects & Apex on behalf of
Marq Logistics (formerly GLP)

ICENI PROJECTS & APEX
ON BEHALF OF MARQ
LOGISTICS (FORMERLY
GLP)

October 2026

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Harborough Local Plan Examination
MATTER 4 STATEMENT

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1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Icen Projects and Apex Transport Planning & Engineering on behalf of Marq Logistics (formerly GLP) ('Marq') who hold commercial land interests at Magna Park, Lutterworth, including Mere Lane and south of George House, identified as allocations MP1 & MP2 in the draft Local Plan.
- 1.2 Marq Logistics is one of the UK's leading industrial and logistics providers and have a long history of delivering successful employment schemes in the Midlands. Magna Park in Harborough is their flagship scheme and is considered to be one of the most successful employment schemes in Europe.
- 1.3 GLP submitted representations on the Harborough Local Plan, including at the Regulation 19 stage, classified under Representor ID 8357.
- 1.4 This Statement builds upon our previous representations in response to the Inspectors' questions within Issues 2 and 4 of Matter 4.
- 1.5 It is also relevant to note that Marq Logistics has submitted planning applications for MP1 and MP2 (26/00765/FUL and 26/00574/OUT)¹, which are currently awaiting determination.

¹ Planning applications 26/00765/FUL (MP1) and 26/00574/OUT (MP2), Harborough District Council:

<https://pa2.harborough.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=TFQV36HWGIJ00>
<https://pa2.harborough.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=TE0DNLHWFH00>

2. MATTER 4 – CREATING JOBS AND DIVERSIFYING THE ECONOMY

Issue 2: Employment Uses: Strategic Warehousing

2. Our understanding is that the wider area forms part of a ‘Golden Triangle’ which has peculiarly good access to the national road network, as well as rail freight, and thereby to customers. How has the location of large-scale strategic warehousing been considered in the context of the wider ‘Golden Triangle’ and the cumulative impact of existing and as yet unimplemented permitted strategic warehousing at Daventry International Freight Terminal (DIRFT,) Rugby Gateway and within the A426 corridor?

- 2.1 The Council’s allocation of land at Magna Park has been made in full consideration of the ‘Golden Triangle’, as highlighted at paragraph 2.10. The supporting text to Policy DS02 at paragraph 4.26 recognises that the District’s strategic location within the Golden Triangle has led to continued growth in the need for strategic warehousing, with a need for more and larger strategic distribution spaces. The supporting text highlights that it is specifically the western part of the District that benefits from good access to the Strategic Road Network, via the M1 Junction 20.
- 2.2 In this context, Magna Park is uniquely placed to maximise the benefits of the ‘Golden Triangle’, with excellent access to the strategic road network via the A5 and Junction 20 of the M1. This has been demonstrated through the sequential approach to identifying and allocating sites recommended by the 2021 Warehousing & Logistics Study (EMP-NLP 1), described in Section 8 of the Strategic Warehousing Topic Paper (TPC-NLP 6). Magna Park also has significant established infrastructure that future development can build upon to deliver sustainable development.
- 2.3 Turning to cumulative impact, the transport evidence submitted with the applications for MP1 and MP2 provides the most recent assessment of the Magna Park cluster. Site-specific surveys show that daily trips in the study area fell by up to nearly 7,000 (26%) between 2013/14 and 2025, and that peak hour trips fell by around 30% to 40% (Transport Assessment for application 26/00574/OUT (‘the MP2 TA’), section 7.2)². National Highways (NH) accepted the resulting trip rates in principle through the scoping process (MP2 TA para 1.2.2), and Leicestershire County Council (LCC) agreed them (MP2 TA paras 1.2.21 and 7.1.3).
- 2.4 The MP2 TA treats MP1 as a cumulative scheme and applies TEMPro growth to background traffic (MP2 TA paras 9.3.1 to 9.3.5). The consented but unimplemented schemes at DIRFT and Rugby

² Transport Assessment submitted with application 26/00574/OUT (MP2): https://pa2.harborough.gov.uk/online-applications/files/9B8148C5BF0B78601B9043BFFAB4239A/pdf/26_00574_OUT-TRANSPORT_ASSESSMENT-1480605.pdf

Gateway form part of the wider cumulative picture, which should be reflected in the future year assessment in LCC's strategic transport model ('PRTM'), as explained in our response to Question 5 below.

3. How does the quantum of proposed development relate to the Leicester and Leicestershire Authorities Statement of Common Ground relating to Strategic Warehousing Need, March 2026 [SCG-NLP26]?

- 2.5 It is assumed that Q3 is intended to relate to Document SCG-NLP23.
- 2.6 As identified within the SoCG, the 2025 Leicester & Leicestershire: Strategic Distribution Floorspace Needs Update and Apportionment ('the Study') (EMP-NLP 6) is the most up-to-date evidence base document regarding the need for strategic warehousing across Leicester and Leicestershire.
- 2.7 The Study identified a total need for 3,969,400 sqm strategic warehousing floorspace across Leicester and Leicestershire. The Study apportions this need across each authority, concluding that there is a need for 823,400 sqm in Harborough over the period to 2046.
- 2.8 The Study's figure of 823,400 sqm relates to the period to 2046. When adjusted to align with the emerging Harborough Local Plan period, which has a 2023 base date and runs to 2041, the identified need is 644,400 sqm.
- 2.9 Taking account of 257,000 sqm of completions and commitments (detailed in Table 7.5 of EMP-NLP 6), the residual need for strategic warehousing floorspace in Harborough over the plan period is 387,400 sqm. As currently drafted in the submitted Plan, therefore, the requirement under Policy DS02 would leave a shortfall of 47,400 sqm.
- 2.10 However, as detailed in our Regulation 19 representations, the MP1 and MP2 allocations have the capacity to deliver more than the 340,000 sqm assumed in Policy DS02. Our representations highlighted how up to approximately 300,000 sqm could be delivered at MP2, and approximately 70,000 sqm at MP1, delivering a total of 370,000 sqm. Marq Logistics has subsequently submitted planning applications for both sites (26/00765/FUL and 26/00574/OUT)³, proposing up to 300,000 sqm at MP2 and 69,995 sqm at MP1. As detailed in our representations, it will therefore be necessary to update the site capacities in DS02 to reflect this evidence, to ensure the policy is justified and thus sound.

³ Planning applications 26/00765/FUL (MP1) and 26/00574/OUT (MP2), Harborough District Council:

<https://pa2.harborough.gov.uk/online-applications/simpleSearchResults.do?action=firstPage>

<https://pa2.harborough.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=TE0DNLHWFH00>

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- 2.11 This potential additional supply from Magna Park is acknowledged at paragraph 6.11 of the Council's Strategic Warehousing Topic Paper (TPC-NLP 6). Combined with up to 52,000 sqm of 'extra supply from April 2024' identified by the Council at paragraph 9.9 of the Topic paper, this would result the identified need being met in full, with a buffer of up to 34,600 sqm. The 370,000 sqm from MP1 and MP2 makes up the vast majority of this supply.

4. What are the locational requirements for strategic warehousing? Is there any synergy to be derived from extending Magna Park? Is the quantum of strategic warehousing (340,000 sqm) which has been planned within the District justified?

- 2.12 As summarised at paragraph 1.5 of the 2021 Warehousing & Logistics Study (EMP-NLP 1), key locational requirements include access to the strategic road network, as well as access to a suitable workforce. The study also highlights the need for relatively flat, regular sites. Furthermore, it emphasises the role of distribution clusters, with logistics companies benefitting from locating near to each other. This encourages cooperation to reduce supply chain costs, exchange knowledge, technology and services, and benefit from shared infrastructure.
- 2.13 Magna Park wholly satisfies the above requirements, and no other sites in the District are as accessible from the Strategic Road Network (per Harborough Strategic B8 Needs Sensitivity Analysis 2024). Marq is thus in agreement with the Council that the most appropriate place for the identified need to be met is at Magna Park, across the two allocated sites (MP1 and MP2).
- 2.14 The benefits of building on established locations are recognised in the sequential approach to new allocations set out in paragraph 11.19 of the 2021 Warehousing & Logistics Study (EMP-NLP 1), which recommends extending existing strategic distribution sites as a first priority.
- 2.15 Paragraph 4.5 of the Strategic Warehousing Topic Paper (TPC-NLP 6) specifically considers the existing facilities and infrastructure available at Magna Park, which future development would benefit from, including a dedicated onsite training hub (CLEAR), a new lorry park and HGV EV charging facility and Innovation Centre and Bittesby Country Park. As explained in paragraph 8.15 of the Topic Paper, Magna Park's established status, its relationship with Lutterworth and access to labour make concentrating development here preferable to a more dispersed approach in sustainable development terms.
- 2.16 In terms of the quantum of development being planned for, Policy DS02 identifies a requirement for 340,000 sqm floorspace for strategic warehousing, which is to be delivered at Magna Park across two sites (MP1 and MP2). As set out above, the most up-to-date evidence identifies a need for 387,400 sqm floorspace for strategic distribution uses across the Plan period. While Marq supports the allocation of the two sites at Magna Park, it considers that the wording of Policy DS02 should be modified to enable 'up to 370,000 sqm' to be delivered across MP1 and MP2, reflecting the 70,000

sqm capacity of MP1 and 300,000 sqm capacity of MP2. This modification is considered necessary to ensure that the policy requirement is fully justified and therefore sound, as detailed in our Regulation 19 representations.

- 2.17 Subject to the suggested modification in terms of total floorspace across the two allocated sites, the allocation for additional strategic warehousing at Magna Park is considered justified.

5. What highway impacts are forecast within Harborough District and beyond, and would this result in either an unacceptable impact on highway safety or severe residual cumulative impacts on the highway network?

- 2.18 The initial assessment in the MP2 TA shows that the forecast increase exceeds 5% in the morning and afternoon peak hours at only four junctions (A5/Mere Lane and three A4303 junctions), that the modelled junctions remain within acceptable capacity thresholds, and that the residual cumulative impact is not severe. It also concludes that there would be no unacceptable impact on highway safety (MP2 TA paras 8.2.2, 12.1.15, 12.2.2 and 12.2.3). The MP1 Transport Assessment for application 26/00765/FUL ('the MP1 TA')⁴ reaches the same conclusions for MP1 (MP1 TA paras 11.2.1, 12.1.9 and 12.2.3).
- 2.19 The Council's Preliminary Scheme Design (Local Highway) report (September 2026) (HDC13) finds that several junctions flagged by the strategic model need no mitigation and that workable solutions are available at the others, including on the A4303 in Lutterworth (HDC13, paras 1.1.4, 1.1.5 and 1.1.7). We address it further in our response to Matter 10, Question 6.
- 2.20 Beyond the District, the key location is the A5/A426 Gibbet Hill roundabout on the Strategic Road Network (SRN). Around just a fifth of the traffic generated by MP1 and MP2 is forecast to travel through the Gibbet Hill roundabout, so the significant majority of site traffic uses alternative routes (MP2 TA Table 7-3; MP1 TA Table 7-3). The increase in flows at the junction is less than 3%, against 2025 flows that are lower than those assessed and accepted for historic approved applications (MP2 TA Tables 8-4 and 8-5 and paras 8.3.24 to 8.3.28).
- 2.21 The capacity constraint at the Gibbet Hill roundabout is an existing one, and it exists irrespective of whether MP1 and MP2 come forward. The Council's own strategic modelling shows the roundabout over capacity in the 2041 Core scenario, which excludes the Plan's development (the Council's

⁴ Transport Assessment submitted with application 26/00765/FUL (MP1): https://pa2.harborough.gov.uk/online-applications/files/8433EDF8CAD4C6A1F2126AD3863D799A/pdf/26_00765_FUL-TRANSPORT_ASSESSMENT_PART_1_OF_5-1489504.pdf

Strategic Transport Impact Assessment ('the STIA') (TRP-NLP 2), paras 3.5.7 and 3.5.8), and the Council's evidence records it at 98% capacity (INF-NLP 2).

- 2.22 The improvement is therefore needed whether or not MP1 and MP2 are developed, and the initial assessments indicate that they would not have a severe impact on its operation.
- 2.23 A calibrated and validated Vissim model of the Gibbet Hill roundabout, which NH has confirmed it is content with, is available for future year scenarios. The 'with development' outputs of LCC's strategic transport model ('PRTM') are due by 13 November 2026, and in the meantime the interim assessments in the MP1 TA and MP2 TA demonstrate that the developments would not have a severe impact (MP2 TA paras 12.1.15 and 12.2.3; MP1 TA paras 12.1.9 and 12.2.3). The modelling is explained in our response to Matter 10, Question 6.
- 2.24 The position at Cross in Hand is addressed in our response to Question 6.

6. Given the existing capacity constraints on the A53, which would require considerable investment to mitigate, is it consistent with national policy to bring forward additional strategic warehousing at a location which is solely dependent on the road network? If so, what certainty is there that such improvements would be forthcoming over the Plan period? When would they be complete and would additional warehousing over that which has been permitted or vacant be developable over the Plan period?

- 2.25 The Inspectors' question refers to the 'A53', which we understand to mean the A5. The December 2023 NPPF requires significant impacts from development to be cost-effectively mitigated (paragraph 114) and says that development should be refused only where there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe (paragraph 115). Both tests are directed at the impact of the proposed development.
- 2.26 The congestion at the Gibbet Hill and Cross in Hand roundabouts exists today and is not caused by MP1 and MP2, which add only a small proportion of the traffic (see our response to Question 5). The Council's Infrastructure Delivery Plan includes no SRN schemes (Transport Topic Paper (Part 2) (HDC14), paras 5.71 and 5.88 to 5.91). The relevant question is therefore whether the traffic that the allocations add can be mitigated and would not be severe, and the evidence indicates that it can and would not.
- 2.27 Paragraph 114(a) of the NPPF asks whether appropriate opportunities to promote sustainable transport modes can be, or have been, taken up. At Magna Park they have. The allocations adjoin an established hub with bus services, a shared pedestrian and cycle link to Lutterworth and an operating travel plan (MP2 TA paras 5.9.1 to 5.9.6).

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- 2.28 The existing sustainable travel measures at Magna Park can be extended into MP1 and MP2, with enhancements that would also benefit the existing site. The additional employees would increase car sharing matches and could support more frequent bus services or help secure the ongoing viability of existing services, particularly given the positive relationship between Marq and Arriva at the existing site. Together, these measures can assist in reducing vehicle movements from existing Magna Park users.
- 2.29 Magna Park has access to rail freight at DIRFT III, about 11km south and accessed directly from the A5. Existing and future occupiers have the opportunity to use rail, reducing reliance on long-distance HGV movements and supporting a shift of freight from road to rail. Those journeys largely avoid the local network.
- 2.30 As such, Magna Park is not solely dependent on the road network, and the opportunities to promote sustainable modes are being taken up.
- 2.31 On certainty, the appropriate test is a reasonable prospect of delivery within the Plan period. The A5 Gibbet Hill scheme is a NH Major Project in the Road Investment Strategy 3 (RIS3) enhancements pipeline, one of nine schemes to be developed during the current road period with a view to starting construction early in the fourth road period (RIS3, pages 60 and 74)⁵. NH's programme currently assumes construction would start in 2031 and open to traffic in 2033, subject to approval and funding (NH, A5 Gibbet Hill Environmental Assessment Non-Technical Summary, August 2026, para 2.2.1)⁶, and its consultation on three shortlisted options⁷ is summarised in our response to Matter 10, Question 6. Developer contributions of £5.17 million have also been secured and pooled at Gibbet Hill (MP2 TA Table 8-6).
- 2.32 Together, these provide a reasonable prospect that an improvement will be delivered within the Plan period.
- 2.33 NH has agreed with the Council that no SRN mitigation is required for the Local Plan, with any necessary mitigation identified at application stage (SCG-NLP 25). LCC and Warwickshire County Council (WCC) do not agree. They consider that a strategic scale improvement is required at Gibbet Hill, beyond what a developer could deliver, that NH has made no funding commitment, and that timely delivery is extremely unlikely (HDC15, paras 3.1 and 6.1 and Appendix B, paras 2.12 and

⁵ Department for Transport, Road Investment Strategy 3: 2026 to 2031 (pages 60 and 74):

<https://www.gov.uk/government/publications/road-investment-strategy-3-ris3-2026-to-2031>.

⁶ National Highways, A5 Gibbet Hill Environmental Assessment Non-Technical Summary (August 2026), para 2.2.1:

<https://nationalhighways.citizenspace.com/he/a5-gibbet-hill-consultation/>

⁷ National Highways, A5 Gibbet Hill Options Consultation (September 2026):

<https://nationalhighways.citizenspace.com/he/a5-gibbet-hill-consultation/>

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- 2.13). We agree that the strategic scheme is for NH and that it has no funding commitment, but we do not agree that no improvement is achievable (see below), and we consider the test of a reasonable prospect of delivery is met, as set out above and in our response to Matter 6, Question 16.
- 2.34 An improvement at Gibbet Hill has also previously been agreed. Condition 27 of the Symmetry Park permission (15/00865/OUT, 5 July 2018)⁸ required a signalised improvement of the roundabout, in accordance with an agreed drawing or another appropriate scheme approved by the highway authorities, and a financial contribution of £2.75 million towards improvements at the junction has since been secured under that permission, forming part of the pooled funding (MP2 TA Table 8-6). NH's more recent options assessment has discounted signalisation of the existing layout, but the earlier agreement shows that the junction can be improved and that funding has been secured. Further detail is in our response to Matter 10, Question 7.
- 2.35 At Cross in Hand, a modest improvement within highway land has been designed (MP2 TA and MP1 TA, para 8.3.17), which can be delivered by LCC or NH without third-party land. The MP1 TA and MP2 TA junction models show the roundabout operating well within capacity with MP1 and MP2 in 2031 (maximum ratio of flow to capacity 0.70), as explained in our response to Matter 10, Question 7.
- 2.36 The improvement is a deliverable and proportionate response at the junction, towards which contributions from MP1 and MP2 could be made (or towards any alternative scheme that NH or LCC identifies) if the Inspectors consider this necessary, and policy wording could link occupation to the delivery or funding of the Cross in Hand improvement. The Council no longer relies on the STIA's earlier signalisation scheme at the junction (HDC14, para 5.71).
- 2.37 On timing, both improvements can therefore be in place within the Plan period to 2041 on the current programme, and MP1 and MP2 are developable within it.

Issue 4: Existing Employment

2. Is the approach to the protection of the designated employment areas in policy DS02, effective and justified?

⁸ Decision notice, application 15/00865/OUT (Symmetry Park), 5 July 2018 (Conditions 27 and 28):

https://pa2.harborough.gov.uk/online-applications/files/B9173B5864668F16FB134626AEC34758/pdf/15_00865_OUT--809539.pdf

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- 2.38 Marq support the overall objectives of Policy DS02 in its approach to protecting designated employment areas, including Magna Park, but as highlighted in our Regulation 19 representations, we suggest modifications to the policy wording to ensure it is effective and justified.
- 2.39 First, Part 8 (c) could be interpreted as referring to specifically storage and distribution uses which are not strategic in scale, as opposed to any alternative uses. In order to ensure that Part 8 (c) avoids any confusion and is thus effective, the text should be updated to refer to 'any alternative uses to strategic storage and distribution'.
- 2.40 Second, in Marq's view the requirement to identify 'significant benefits' to the District and achievement of Local Plan objectives to justify any alternative uses would be unduly restrictive, and would therefore not be justified. Small-scale alternative uses complement the function of employment areas, but it is not clear how these uses could be assessed as providing 'significant benefits' at a District-wide level. On this basis, it is considered necessary to remove this requirement entirely from Part 8 (c).
- 2.41 The above changes would ensure that the protection of designated employment areas under Policy DS02 would be effective and justified.