



OCTOBER
2026

Harborough Local Plan Examination

Matter 6 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 6 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) 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 GLP submitted representations on the Harborough Local Plan, including at the Regulation 19 stage, classified under Representor ID 8357.
- 1.3 This Statement builds upon those previous representations in response to the Inspectors' Matter 6, Issues 1 & 2 questions.

2. MATTER 6 – STRATEGIC INFRASTRUCTURE

Issue 1: Supporting Strategic Infrastructure

Policy DS05 Development Strategy: Supporting Strategic Infrastructure

14. The NPPF paragraph 114 is clear that when assessing sites, the cost-effective mitigation of significant impacts on the transport network in terms of capacity and congestion, or on highway safety, should be ensured whether at the plan making or planning application stage. Is the Plan supported by an adequate, easily accessible costed evidence base which demonstrates that this is the case and which sets out clearly how the Council has approached the issue of costings and need, with particular reference to its objective of reducing reliance on the private car. Is this presented in a manner which would avoid a ‘paper chase’ exercise and has it been agreed with the relevant highway authorities?

- 2.1 The Council is best placed to confirm the Plan-wide position, including its agreement with the highway authorities. For the A5 junctions in close proximity to Magna Park, in our view the Plan is supported by an adequate costed evidence base, as set out below.
- 2.2 The Council’s junction evidence has changed since the Plan was submitted. The Council no longer relies on the junction schemes and costs in Section 5 of its Strategic Transport Impact Assessment (‘the STIA’) (TRP-NLP 2), which it regards as superseded by the Joint Transport Evidence Stage 2 (TRP-NLP 5), its Costing Mitigation Report (TRP-NLP 4) and its Preliminary Scheme Design (Local Highway) report (HDC13) (Transport Topic Paper (Part 2) (HDC14), paras 5.69 to 5.72). Those documents address the local road network. The Council’s updated Infrastructure Delivery Plan includes no schemes on the Strategic Road Network (SRN), because National Highways (NH) has agreed with the Council that there is no requirement for SRN mitigation for the Local Plan within the Plan period, and that any SRN mitigation will be identified through the planning application process (HDC14, paras 5.88 to 5.91; Statement of Common Ground between the Council and NH (SCG-NLP 25)).
- 2.3 Before it was superseded, the STIA identified full signalisation at both the Gibbet Hill and Cross in Hand roundabouts (STIA Table 5.2 and Appendix D). We do not rely on those schemes or their costs, as the Council no longer does. NH is now consulting on roundabout improvement options at Gibbet Hill¹, and the cost of its scheme will depend on the option it selects.
- 2.4 Funding at Gibbet Hill is already identified in part. A total of £5,173,335.89 has been secured and pooled for the junction through earlier planning obligations (Transport Assessment for application

¹ National Highways, A5 Gibbet Hill Options Consultation (September 2026):

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

26/00574/OUT ('the MP2 TA'), Table 8-6)², and NH's own programme provides a second route (see our response to Question 16). At Cross in Hand, a modest improvement within highway land has been designed, comprising minor widening, longer flares and spiral markings, and can be delivered by either Leicestershire County Council (LCC) or NH (MP2 TA para 8.3.17 and Figure 8-1).

- 2.5 For the local road network, the Council's Preliminary Scheme Design (Local Highway) report (HDC13) has tested the junctions that the strategic modelling flagged and identifies eleven local road schemes, with an upper estimate of about £8.2 million (HDC13, Appendix C; HDC14, paras 5.85 and 5.86). It concludes that the Local Plan's impacts on the local road network are either insignificant or can be addressed through feasible junction improvements, subject to further work at one junction on the A6 (HDC13, paras 1.1.4, 1.1.6 and 1.1.8).
- 2.6 Several junctions flagged by the strategic model need no mitigation once tested in detail, and a deliverable lane-widening scheme is identified on the A4303 in Lutterworth (HDC13, paras 1.1.5, 1.1.7, 4.4.5 and 4.5.8; see our response to Matter 10, Question 6). LCC has not yet completed its review of that report (HDC14, paras 1.6 and 5.87).
- 2.7 The Plan's objective of reducing reliance on the private car is reflected in the Council's updated Infrastructure Delivery Schedule, which costs active travel, public transport and travel planning measures for MP1 (about £107,000, £207,000 and £24,000) and MP2 (about £823,000, £1.48 million and £141,000), to be secured through section 278 agreements, section 106 obligations or the community infrastructure levy (HDC11A, entries TR106 to TR111). It is also reflected at Magna Park itself. 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), the measures can be extended into MP1 and MP2, and occupiers have access to rail freight at the DIRFT III Strategic Rail Freight Interchange, which is accessed directly from the A5 (see our response to Matter 4, Question 6).
- 2.8 NH has agreed with the Council that further detailed assessment is required at the development management stage to confirm impacts and mitigation (SCG-NLP 25, as summarised in the Statement of Common Ground between the Council, LCC and Warwickshire County Council (WCC) relating to MP1, MP2 and the A5 (HDC15), para 5.4). Agreement with the highway authorities on the Plan-wide position is a matter for the Council, and LCC and WCC do not agree with NH's position on the A5, as recorded in HDC15, which we address in our response to Question 16. NH has recorded no soundness concern in SCG-NLP 25 and accepted in principle the trip rates used in the Transport Assessments for MP1 and MP2 (MP2 TA para 1.2.2), and has confirmed that it is content with the

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

Vissim model of the Gibbet Hill roundabout. LCC agreed the trip rates (MP2 TA paras 1.2.21 and 7.1.3), and the outputs of its strategic transport model are awaited (see our response to Matter 4, Question 5).

- 2.9 For the A5 junctions in close proximity to Magna Park this avoids a 'paper chase'. The evidence is in HDC13, HDC14, the two Statements of Common Ground (SCG-NLP 25 and HDC15), the MP1 and MP2 Transport Assessments and NH's published consultation material, and we have drawn it together above and in our response to Question 16.
- 2.10 In summary, for the A5 junctions in close proximity to Magna Park, the evidence identifies the schemes and shows routes to funding and delivery: £5.17 million is secured and pooled at Gibbet Hill, NH is progressing its own scheme, and a modest improvement is available at Cross in Hand. The Council has not costed an SRN package, consistent with NH's agreed position that none is required for the Local Plan within the Plan period, and LCC and WCC do not share that position (HDC15). Taken together with the application-stage evidence, this is sufficient to demonstrate that significant impacts can be cost-effectively mitigated, as paragraph 114 requires.

16. As such, is the evidence relating to both the direct and non-direct impacts of the quantum and location of development consistent with the delivery of the strategic sites? Specifically, what evidence is there that the infrastructure, including mitigation measures, associated with the strategic housing and mixed-use sites and the two strategic warehousing sites at Magna Park can be delivered together with the required infrastructure in a timely fashion?

- 2.11 The infrastructure associated with the two allocations is deliverable with the development. For MP2 it comprises a site access roundabout, a link road, footway provision on Ullesthorpe Road, traffic regulation order contributions and a Travel Plan (MP2 TA paras 12.1.17 and 12.2.2). For MP1, the Transport Assessment for application 26/00765/FUL ('the MP1 TA')³ demonstrates that suitable vehicle access and active travel connections can be provided. These are a new fourth arm on the existing roundabout at the southern end of Coventry Road, a 2.5m footway, a new tactile crossing, and a shared foot/cycleway that ties into the existing network with onward connections to Magna Park Central and Lutterworth (MP1 TA paras 6.2.1 to 6.2.7 and 11.1.1 to 11.1.3). NH's Statement of Common Ground with the Council records that the planned growth is deliverable and that there is a realistic prospect that longer term investment can be secured within the timescales envisaged (SCG-NLP 25).
- 2.12 At Gibbet Hill there are two complementary routes to an improvement. The first is developer funding, with £5.17 million secured and pooled (see our response to Question 14). An improvement at the junction has also previously been agreed. Condition 27 of the Symmetry Park permission

³ 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

(15/00865/OUT, granted by the Council on 5 July 2018)⁴ required a signalised improvement of the roundabout, with widened and flared entries, to be in place before first occupation, in accordance with an agreed drawing 'or another appropriate scheme, approved by Highways England and Warwickshire County Council' and the Local Planning Authority. A financial contribution of £2.75 million towards improvements at the junction has since been secured under that permission, and forms part of the pooled funding (MP2 TA Table 8-6).

- 2.13 The Inspector who allowed the Magna Park Extension appeal (APP/F2415/W/18/3206289, 18 April 2019)⁵ found no cogent evidence of severe residual cumulative impacts, the proposals having been considered by LCC, WCC and Highways England (para 105). NH's more recent options assessment has discounted signalisation of the existing layout, because its modelling showed that this did not perform well under future traffic conditions, and its consultation options are more significant roundabout improvements. The earlier agreement nonetheless shows that NH and the local highway authorities have accepted that this junction can be improved and funding has been secured towards this.
- 2.14 The second route is the NH programme. Road Investment Strategy 3 (RIS3, covering 2026 to 2031) names the A5 Gibbet Hill scheme as one of nine pipeline development schemes that 'will be developed during the third road period to start construction early in the fourth road period', subject to business cases (RIS3, pages 60 and 74)⁶. NH is consulting from 23 September to 3 November 2026 on three shortlisted options, Options 5, 6 and 11, all of which are designed to improve traffic flow and reduce congestion (NH, A5 Gibbet Hill Options Consultation Brochure, September 2026). Its programme currently assumes that construction would start in 2031, last about 24 months and open to traffic in 2033, subject to planning approval and confirmation of funding (NH, A5 Gibbet Hill Environmental Assessment Non-Technical Summary, August 2026, para 2.2.1)⁷. On that programme, the improvement would be in place within the Plan period to 2041, with the pooled developer funding able to support delivery alongside it. The final decision on whether to deliver the scheme rests with the Department for Transport, so the appropriate test is a reasonable prospect of delivery and not certainty.

⁴ 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

⁵ Appeal decision APP/F2415/W/18/3206289 (Magna Park Extension), 18 April 2019:

<https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3206289&CoID=0>.

⁶ 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>.

⁷ 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/>

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- 2.15 LCC and WCC do not agree with NH's position. They consider that a strategic scale improvement is required at Gibbet Hill for further logistics growth at Magna Park, that it is beyond what a developer could deliver, that NH has made no funding commitment, that no small scale interim solution is tenable, and that timely delivery is extremely unlikely. Neither authority currently supports the allocations on that basis (HDC15, paras 3.1 and 6.1 and Appendix B, paras 2.12 and 2.13).
- 2.16 We agree that the strategic Gibbet Hill scheme is for NH, that it is beyond what a developer could deliver alone, and that NH has committed no funding. We do not agree that no improvement is achievable. An improvement was approved by Highways England and WCC under Condition 27 of planning permission 15/00865/OUT, and funding has been secured, as set out above. For the strategic scheme, the test is a reasonable prospect of delivery. That is met by its place in the RIS3 pipeline, NH's three modelled options, its 2033 opening assumption, NH's options consultation (opened 23 September 2026), and the LCC and WCC acknowledgement that NH is progressing the business case in partnership with them (HDC15, para 6.1).
- 2.17 A Vissim model of the Gibbet Hill roundabout has been built from April 2025 survey data, calibrated and validated. It was audited by AECOM on behalf of NH, which confirmed on 16 July 2026 that it is content with the updated model (Vissim Modelling Impact Assessment Report MG0406, paras 1.1.3 and 1.3), so the model is suitable for future year scenarios.
- 2.18 The 'with development' future year modelling awaits the outputs of LCC's strategic transport model ('PRTM'), which LCC is running for the MP1 and MP2 applications. The work commenced on 1 June 2026 and LCC's latest programme is for 'with development' modelling completed by 23 October 2026 and the forecasting report issued by 13 November 2026. In the meantime, the interim assessments undertaken within the MP2 TA and MP1 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).
- 2.19 Non-direct impacts include traffic diverting from the A5 junctions onto local roads. WCC is concerned about HGVs routing through villages in Warwickshire via the B4112 and B4027, and asks that promoters of development at Magna Park develop and fund HGV Route Management Strategies (HDC15, Appendix B, paras 2.5, 2.6 and 2.14). Such controls are already used at Magna Park. Condition 28 of the Symmetry Park permission requires an HGV Routing Strategy before first occupation, and the planning obligation for the Magna Park Extension included an HGV routeing plan agreement, a construction traffic and HGV routeing plan and traffic regulation order contributions, which the Inspector found necessary to limit disturbance to neighbouring communities and to mitigate the impacts of traffic on the local road network (APP/F2415/W/18/3206289, paras 8 and 116). MP2 also proposes traffic regulation order contributions (MP2 TA para 12.1.17). These matters can be secured by condition and planning obligation at application stage.

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- 2.20 In summary, the evidence shows that the infrastructure associated with the two strategic warehousing sites can be delivered together with the required infrastructure in a timely fashion. The site access and active travel works are deliverable with the development. For the A5 junctions in close proximity to Magna Park, there are identified routes to delivery: at Gibbet Hill through secured and pooled developer funding, a previously agreed improvement and NH's pipeline scheme, and at Cross in Hand through a modest improvement within the highway boundary (see our response to Question 14). LCC and WCC take a different view of the prospects at Gibbet Hill, as addressed above, but taken together these provide a reasonable prospect of delivery within the Plan period, which is the appropriate test. The remaining strategic modelling will refine the assessment of wider network effects, but nothing in the evidence to date suggests a severe residual cumulative impact. We leave to the Council the evidence on the strategic housing and mixed-use sites.

Issue 2: Viability

- 8. In the context of a plan where transport issues are fundamental to its delivery, such as Magna Park (policies MP1 and MP2) and policy DS02-Land South of Gartree Road, together with cross boundary impacts, it is vital that there is reasonable certainty at a plan level that there is or will be access to funding to mitigate the impacts of transport as well as deliver the other strategic infrastructure requirements. Without this the strategy of the Plan may be undermined and the development proposed not be deliverable. Were a developer to be unable to demonstrate that such developments were viable, with the associated strategic infrastructure, how should a decision maker react?**
- 2.21 There is reasonable certainty of access to funding at plan level for the transport mitigation identified for Magna Park. The Council has not costed an SRN package for the Plan, because NH has agreed that none is required within the Plan period, and the updated Infrastructure Delivery Plan includes no A5 junction costs (HDC14, paras 5.88 to 5.91). LCC and WCC do not share NH's position (HDC15), so the routes to funding at the A5 junctions in close proximity to Magna Park matter. £5.17 million has already been secured and pooled for Gibbet Hill (MP2 TA Table 8-6), the NH programme provides a second route at that junction, and at Cross in Hand a modest improvement within highway land is available.
- 2.22 The Council's earlier STIA classed Cross in Hand as a location that more than likely requires mitigation (STIA para 5.2.4 and Table 5.1), while stating that its model is strategic and that site-specific modelling is required (STIA paras 1.1.3, 5.2.5 and 5.2.7). The Council's later Preliminary Scheme Design report follows the same two-stage approach, testing strategically flagged junctions in detail, and finds that some need no mitigation (HDC13, paras 1.1.4 and 1.1.9; HDC14, para 5.81). At Cross in Hand, the MP1 and MP2 assessments use the junction model from the approved HGV parking facility application (22/02002/OUT)⁸, which assumes the modest improvement described below. The maximum ratio of flow to capacity with MP1 and MP2 in 2031 is 0.70, which is within the

⁸ Application 22/02002/OUT (HGV parking facility), Harborough District Council: <https://pa2.harborough.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=RLPGKBHWIG800>

0.85 level generally taken as the threshold for satisfactory operation, and consistent with the 85% level at which the STIA flags junctions (MP2 TA paras 8.3.15 to 8.3.20 and 10.5.10 to 10.5.14; MP1 TA paras 10.5.18 to 10.5.21; STIA para 5.2.4).

- 2.23 A modest improvement within highway land has been designed for the junction (MP2 TA para 8.3.17), and contributions from MP1 and MP2 could be made towards it, or towards any alternative scheme that NH or LCC identifies at the junction, if the Inspectors consider this necessary. The South Leicestershire Joint Transport Evidence Stage 1 report also observes that large sites have greater potential than small sites to raise funding through developer contributions and to attract public funding (para 6.3), which is consistent with the position at Magna Park.
- 2.24 Strategic warehousing is commercially led development, and a requirement that was unviable would not come forward, which acts as a natural check on proportionality. Policy DS05, as the Council proposes to modify it, requires a proportionate contribution to the reasonable costs of measures needed to mitigate significant cumulative or cross-boundary traffic impacts, through a financial contribution, community infrastructure levy or scheme delivery (HDC14, para 6.8). Where it is claimed that the development cannot bear the infrastructure, the NPPF (December 2023) places the onus on the applicant to demonstrate the viability case (paragraph 58). Any contribution sought should meet the tests in paragraph 57, being necessary, directly related to the development, and fairly and reasonably related to it in scale and kind. Paragraph 115 then sets the threshold for refusal on highways grounds, which is an unacceptable impact on highway safety or residual cumulative impacts on the road network that would be severe. That judgement is made on the development's own incremental effect, which for MP1 and MP2 is an increase in flows of under 3% at Gibbet Hill (MP2 TA Table 7-3; MP1 TA Table 7-3; see our response to Matter 4, Question 5), and the benefits of the scheme are then weighed in the overall planning balance.