

HARBOROUGH DISTRICT LOCAL PLAN EXAMINATION

MATTERS 3, 4 and 6: DS02 / Strategic Warehousing at Magna Park

Hearing Statement Respondent 7271 – Lucy Tankard

Policy DS02 / Strategic Warehousing at Magna Park

1. Introduction

1.1. I am participating in the examination of Policy DS02 insofar as it provides for further strategic distribution/B8 warehousing development at Magna Park, including the MP2 allocation at Mere Lane.

1.2. My representations at Regulation 19 stage raised concerns about the justification for the proposed strategic warehousing provision at Magna Park, including its scale and concentration, the cumulative impacts of development, the adequacy of supporting infrastructure and the implications for the physical separation of Ullesthorpe.

1.3. I do not dispute that strategic logistics has a role in Leicester and Leicestershire, or that Harborough may appropriately accommodate a share of that need. My concern is whether the Council has robustly justified its chosen strategy, particularly the apportionment of need to Harborough and the concentration of additional provision at Magna Park, having regard to existing and committed supply, geographical distribution, cumulative transport impacts and infrastructure deliverability.

1.4. This statement follows the Panel's published MIQs and develops the concerns raised in my Regulation 19 representations by addressing the relevant examination questions. It does not seek to promote a particular alternative site or reopen a general search for alternatives. Rather, it examines whether the proposed allocations, infrastructure and safeguards are sufficient to support a sound and deliverable Plan.

1.5. Where this statement includes questions labelled "Question for the Council", these are my own questions arising from the evidence and matters under examination; they are not quotations from the Inspectors' published Matters, Issues and Questions (MIQs).

2. Matter 3, Issue 1 — Spatial strategy and realistic alternatives

2.1. The spatial strategy needs to be assessed against whether it takes account of reasonable alternatives and proportionate evidence, and whether realistic options for distributing development within the District were robustly considered.

2.2. This provides the wider strategic context for Matter 4, Issue 2. The issue is not whether a different location should automatically have been selected, but whether the Council's evidence demonstrates how it arrived at the decision to concentrate this quantum at Magna Park, including how the relative merits of realistic distribution options were assessed.

2.3. I do not seek to reopen a separate investigation into any particular alternative location. The Council should be able to identify the evidence and reasoning underpinning the spatial choice, *particularly where earlier strategic evidence cautioned against concentrating provision in one Area of Opportunity*.

Question for the Council: *Where is the proportionate evidence and planning reasoning demonstrating that realistic options for the distribution of strategic warehousing were robustly considered before the Council selected Magna Park for the proposed quantum?*

3. Matter 4, Issue 2 — Employment uses: strategic warehousing

MIQ 2: The wider Golden Triangle and cumulative impact of existing and unimplemented permitted provision

3.1. The location of large-scale strategic warehousing needs to be considered in the context of the wider Golden Triangle and the cumulative impact of existing and as-yet-unimplemented permitted provision at DIRFT, Rugby Gateway and within the A426 corridor.

3.2. This is relevant because the spatial question cannot be answered by considering Magna Park in isolation. The earlier Leicester and Leicestershire warehousing study recorded a substantial concentration of road-only strategic logistics around Magna Park: approximately 60% of road-only strategic sites in Leicestershire were located there. *It also described Area of Opportunity 6 (AO6) as, at that time, reasonably well provided for.*

3.3. These are historical findings and should not be treated as a substitute for an updated supply assessment. They do, however, provide a baseline against which the Council should explain how the cumulative provision across the wider Golden Triangle has been considered, including committed schemes and vacant or available floorspace.

Question for the Council: *What evidence demonstrates that the cumulative effect of existing, committed and unimplemented strategic warehousing across the wider Golden Triangle, including the locations identified by the Panel, has been taken into account when determining the additional provision to be allocated at Magna Park?*

MIQ 3: Relationship between the proposed quantum and the March 2026 Statement of Common Ground

3.4. The Plan provides for 340,000 sqm of additional strategic distribution floorspace through the proposed MP1 and MP2 allocations. The relationship between this quantum and the Leicester and Leicestershire Authorities' March 2026 Statement of Common Ground on strategic warehousing need (SCG-NLP26) needs to be clear.

3.5. HDC's April 2026 Strategic B8 Topic Paper reports that the October 2025 EMP-NLP 6 study identifies gross need of 5.2 million sqm for 2023–2046 and an additional floorspace requirement of 3,969,400 sqm across Leicester and Leicestershire. It apportions 823,400 sqm to broad locations within AO6 for 2023–2046. Pro-rated to Harborough's Plan period (2023–2041), this is 644,400 sqm; after completions in 2023/24 and commitments at 1 April 2024, the Topic Paper identifies a residual requirement of 387,400 sqm. The proposed MP1 and MP2 allocations provide 340,000 sqm. The Topic Paper's table also identifies 52,000 sqm of additional supply from April 2024 and potential additional capacity of 30,000 sqm. The Council should explain how these elements are treated in the overall calculation, whether they are deliverable in the required period, and how double-counting is avoided. It should also explain why the new allocation is concentrated at Magna Park.

Question for the Council: How has the Council reconciled the October 2025 study and the March 2026 Statement of Common Ground with the 340,000 sqm proposed under DS02, and where is the reasoning that supports the particular share allocated to Harborough and Magna Park?

MIQ 4: Locational requirements, synergy from extending Magna Park and justification for 340,000 sqm

3.6. The Council relies on Magna Park's established infrastructure, strategic road access, public transport networks and availability of land. These are relevant advantages, but the existence of a strategic need and the benefits of an established logistics location do not, by themselves, establish that this quantum should be concentrated there.

3.7. The earlier strategic study recognised differing locational requirements for operators and recommended an appropriate geographical spread of commercially attractive sites. It advised that future provision should not be concentrated in one Area of Opportunity and that areas with identified under-supply should be considered ahead of areas already well provided for. The Council should explain how the updated 2025 evidence has addressed this recommendation and why it supports concentrating a further 340,000 sqm of strategic warehousing at Magna Park.

3.8. The earlier strategic study identified approximately 1.073 million sqm of road-only vacant units and plots with B8 consents across Leicestershire, including approximately 279,000 sqm at Magna Park South and 320,000 sqm at Magna Park North. These figures reflect the study's supply assessment based on data from April 2020; they are historical, not a statement of current available supply. They nevertheless underline the importance of a reconciled assessment distinguishing occupied floorspace, extant commitments, vacant or available units and plots, and supply genuinely capable of meeting the identified need during the Plan period.

Question for the Council: *What evidence demonstrates that the 340,000 sqm quantum is justified at Magna Park after taking account of current and committed supply, the updated apportionment evidence, the locational requirements of operators and the earlier recommendation for geographical spread?*

MIQ 5: Highway impacts and cumulative effects on the network

3.9. The key issue is whether the forecast highway impacts within and beyond Harborough, including highway-safety effects and residual cumulative impacts on the network, have been adequately assessed. The question is not simply whether the sites have access to the road network; it is whether the impacts of the proposed quantum, alongside existing and committed development, can be mitigated.

3.10. The A5 corridor, M1 Junction 20 and the wider network are relevant insofar as the examination evidence identifies their role in serving the allocation and the cumulative growth strategy. Any concern should be assessed against the current transport evidence and the views of the relevant highway authorities, rather than asserted independently of that evidence.

Question for the Council: What current evidence demonstrates that the highway effects of the two Magna Park warehousing allocations, cumulatively with existing and committed development, can be mitigated without unacceptable highway-safety impacts or severe residual cumulative effects?

MIQ 6: A5 capacity, mitigation certainty, timing and developability

3.11. Panel Note 8, Matter 4, Issue 2, Question 6 refers to existing capacity constraints on the “A5”. The substantive issue is whether the Council’s evidence adequately addresses those capacity constraints, the investment required to mitigate them, the certainty and timing of improvements, and the implications for delivering additional warehousing during the Plan period.

3.12. This is a plan-level deliverability question. If the spatial strategy relies on future highway improvements, the Plan needs a sufficiently clear evidential basis for their funding, timing and delivery, and for the relationship between those improvements and the timing of the additional warehousing.

Question for the Council: What evidence gives reasonable certainty that the highway improvements relied upon to support further Magna Park expansion will be funded and delivered when required, and how does that evidence establish that the proposed additional floorspace is developable within the Plan period?

4. Matter 6, Issue 1 — Strategic infrastructure

MIQs 14–16: Costed transport evidence, confidence in mitigation and timely delivery

4.1. The key infrastructure tests are whether the Plan is supported by an adequate, accessible and costed evidence base for cost-effective mitigation of significant transport impacts; whether that evidence has been agreed with relevant highway authorities; and whether there is sufficient confidence that the impacts can be mitigated.

4.2. MIQ 16 specifically asks whether infrastructure and mitigation associated with the strategic sites, including the two Magna Park warehousing sites, can be delivered together with the required infrastructure in a timely fashion. This reinforces the need to test the cumulative delivery assumptions, not simply the existence of individual mitigation proposals.

Question for the Council: *What evidence demonstrates that the transport infrastructure and mitigation required for both Magna Park warehousing sites, alongside other strategic growth, is costed, deliverable, funded and capable of being implemented in the necessary sequence and timescale, and what is the position of the relevant highway authorities?*

4.3. This question overlaps with Matter 4, Issue 2, MIQs 5 and 6. The purpose here is not to repeat the highway-impact argument, but to test whether the infrastructure strategy provides the certainty required to support the Plan’s spatial choice and the deliverability of the allocations.

5. Ullesthorpe–Magna Park Area of Separation: MP2 boundary and deliverability

5.1. Under Matter 7: Locating Development in the Right Place, Issue 2: Key Development Sites, Question 5 under Magna Park (Strategic Warehousing), concerning Site MP1: Land south of George House, Coventry Road (15.8 ha strategic warehousing B8 land) and Site MP2: Land at Mere Lane, Magna Park (122 ha strategic warehousing B8 land), the Panel asks:

“How would development of this site reinforce the Area of Separation between Ullesthorpe and Magna Park and how has the topography of the site been taken into account in the delineation of the allocation boundary?”

Matter 5, Issue 2, Question 5 also asks whether the requirement in Policy DS04 criterion 2 to avoid coalescence and preserve visual and physical separation is compatible with the extent and delivery of site allocations, expressly identifying Area of Separation 2d alongside Site MP2: Land at Mere Lane (122 ha).

Both questions are directly relevant to the scale and effects of MP2 raised in my Regulation 19 representations. The issue is whether the Plan can secure the physical and visual separation of Ullesthorpe from Magna Park alongside the proposed expansion.

5.2. The scale of the existing park and the intended timetable for further development make this question pressing. Magna Park Lutterworth already accommodates 32 occupiers across 50 buildings, providing in excess of 13 million sq ft of logistics floorspace. The park’s own website describes it as GLP’s flagship distribution park. This existing scale provides important context for assessing the further expansion proposed at MP2. (Source: Magna Park Lutterworth, Past, Present and Future: <https://lutterworth.magnapark.co.uk/past-present-and-future/>.)

MP2 is a 122 ha allocation (approximately 302 acres). In an article published on 6 May 2026, Logistics Matters reported that Marq Logistics was seeking to extend its UK flagship Magna Park Lutterworth scheme by a further 3.23 million sq ft. The article reported that a hybrid planning application was expected later in 2026. The application, reference 26/00574/OUT, was submitted on 24 April 2026 and validated on 6 May 2026. The reported timetable

envisaged construction starting in 2027, first occupation in 2029 and the scheme becoming fully operational by December 2031.

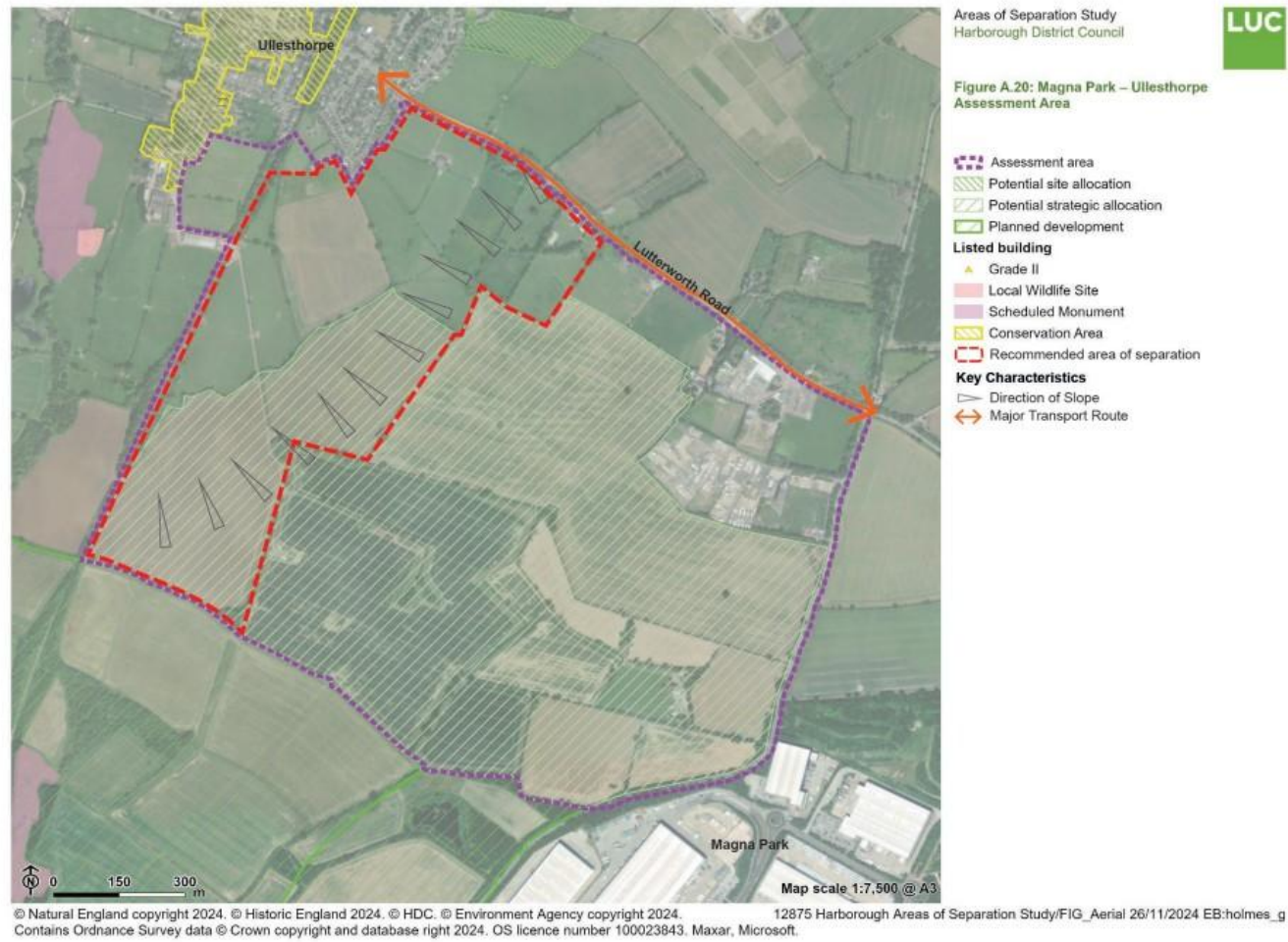
These are reported developer intentions, not a guarantee of approval, construction or occupation. Nor should the 3.23 million sq ft proposal be treated as synonymous with the full 122 ha MP2 allocation, or as evidence that every part of the allocation would be built over. Nevertheless, the reported scale and potential timing of the expansion underline the importance of establishing how the Area of Separation can perform its intended function alongside the allocation.

Source: Logistics Matters, “BREAKING NEWS: Marq Logistics seeks 3 million ft² plus extension to Magna Park Lutterworth”, 6 May 2026: <https://www.logisticsmatters.co.uk/news/breaking-news-marq-logistics-seeks-3-million-ft2-plus-extension-to-magna-park-lutterworth/>

5.3. The November 2024 LUC Areas of Separation Study (LAN-NLP 3) identifies the physical landform that gives the Ullesthorpe – Magna Park gap its separating function. Paragraph A.165 explains that the bridleway follows the ridge crest immediately north of Magna Park, beyond which the landform drops into two valleys before rising towards Ullesthorpe. Paragraph A.166 confirms that, despite partial screening by the ridge crest, Magna Park's large logistics buildings remain highly visible from within the gap. Crucially, paragraph A.172 expressly warns that expansion beyond the public bridleway marking the ridge crest will weaken existing separation, and that the lower valley can continue to distinguish the settlements only if the Area of Separation prevents significant further expansion. Paragraph A.173 further identifies the valley slopes as sensitive to development, which could weaken the valley's separating role. Figure A.20* illustrates the relationship between LUC's recommended Area of Separation and the potential strategic allocation, which encompasses much of the assessed landscape. The evidence therefore raises a substantive question about whether MP2 can be delivered at the proposed scale while retaining the ridge-crest boundary, the openness of the valley slopes and the landscape features on which separation depends.

* Note: Please see Figure A.20: Magna Park – Ullesthorpe key gap characteristics below for the relationship between LUC's recommended Area of Separation and the potential strategic allocation at Magna Park. *Source: LUC, Harborough Areas of Separation Study, November 2024, Figure A.20.*

Figure A.20: Magna Park – Ullesthorpe key gap characteristics



5.4. HDC's April 2026 Strategic B8 Topic Paper, paragraph 8.24, states that the defined Area of Separation follows the evidence recommendation, while explaining that it extends into MP2 to provide master-planning flexibility, a physical connection to the country park and opportunities for multifunctional uses, including biodiversity net gain and environmental mitigation. Those purposes do not, in themselves, demonstrate that the separation function identified by LUC will be maintained. Given the extent of the proposed allocation, LUC's express warning about further expansion and the importance of the ridge crest and valley landforms, HDC must demonstrate how these objectives can be accommodated without undermining the Area of Separation. In particular, if the bridleway is to be diverted, the Council should explain how the physical and visual separation function associated with the ridge-crest boundary will be retained, and how sufficient openness will be secured across the sensitive valley landscape.

5.5. Proposed Modification 79 would add an express requirement to Policy SA01 for development to respect and maintain physical separation between Ullesthorpe and Magna Park, prevent coalescence and protect the village's individual character and identity. This is a proposed modification, not an adopted or Inspector-approved safeguard. While relevant, the proposed wording does not itself demonstrate that the allocation's scale, boundary and development capacity can deliver that outcome. The examination must establish whether the evidence supports that conclusion before reliance is placed on the proposed safeguard.

Question for the Council: What evidence demonstrates that the MP2 allocation boundary and development capacity, having regard to the site's topography, can accommodate a layout that maintains the physical and visual separation between Ullesthorpe and Magna Park? In particular, how does the proposed layout respond to the ridge crest followed by the public bridleway and the sensitive valley slopes identified by LUC? If the bridleway is to be removed or diverted, how will the ridge-crest boundary and its separating function be retained, and how will the openness necessary to preserve the distinction between the settlements be secured?

5.6. The issue is not simply whether an Area of Separation has been designated, but whether it can perform the function for which LUC recommended it in the face of the proposed MP2 expansion. I do not assert that the Area of Separation is necessarily incorrectly drawn or that Proposed Modification 79 is ineffective. I ask the Inspector to establish whether the Plan's evidence demonstrates that the scale, boundary and delivery of MP2 are compatible with maintaining the physical and visual separation of Ullesthorpe from Magna Park.

6. Overall position and conclusion

6.1. The central issue remains whether HDC has adequately justified the scale and, crucially, the apportionment and concentration of additional strategic warehousing at Magna Park through DS02.

6.2. The relevant examination questions identify the key tests: the wider Golden Triangle and cumulative provision; the relationship between the proposed quantum and the March 2026 Statement of Common Ground; locational requirements and the justification for 340,000 sqm; highway impacts and A5 constraints; the deliverability of strategic infrastructure; and the compatibility of MP2 with the objective of maintaining physical and visual separation between Magna Park and Ullesthorpe.

6.3. I accept that strategic logistics need exists and that Magna Park has locational advantages. The examination should establish whether the Council has demonstrated, through current and proportionate evidence, why those advantages justify this quantum and concentration, and whether the infrastructure and settlement-separation safeguards are effective in practice.

6.4. If the evidence does not demonstrate that the quantum, location or delivery assumptions are justified, the Inspector should consider whether further clarification or modifications are necessary. Depending on the evidence, these could include changes to the quantum or phasing, clearer infrastructure triggers or safeguards, or changes to the MP2 policy requirements needed to secure the stated separation objective. I do not prescribe a particular modification before the evidence has been tested.

Fundamental examination question: Has HDC demonstrated, through proportionate and up-to-date evidence, that the proposed 340,000 sqm of additional strategic warehousing is justified at Magna Park, having regard to wider strategic distribution, existing and committed supply, locational requirements, cumulative transport impacts and infrastructure deliverability, and that MP2 can be delivered consistently with the Plan's objective of maintaining physical and visual separation between Magna Park and Ullesthorpe?