

Matter 4: Creating Jobs and Diversifying the Economy

Position and scope

- 1.1.1. STNT maintains its request to delete SA02. This statement addresses Issues 1 and 4 only, developing the original objections concerning the relationship between housing, employment, infrastructure and commuting. It applies the December 2023 NPPF, as directed by [ID10, paragraph 1, p.1](#). Its central concern is not whether employment development could benefit SA02, but whether the employment provision relied upon to justify its sustainability would be delivered when needed. The original basis is [Reg19 sections 6 and 8.1.5–8.1.6, pp.26–27 and 34–35/PDF pp.30–31 and 38–39](#).

Issue 1: Employment uses: excluding strategic warehousing

Question 1 — The 60-hectare requirement

- 1.1.2. The Council has an evidenced basis for a requirement of approximately 60 hectares; that figure does not establish the necessity of SA02. The February 2025 [Local Housing and Employment Land Evidence, section 10, Table 10.8, p.169/PDF p.172](#), combines office/R&D forecasts with industrial demand and allowances for flexibility, replacement and vacancy. Its [Table 12.3, p.187/PDF p.190](#), nevertheless records a 5.9-hectare aggregate surplus on its dated supply assumptions, conditional on rolling forward unconsented land, with differences between employment categories. That is not a verified current surplus or proof that every category is adequately supplied.
- 1.1.3. The report's case for additional Leicester-fringe employment includes balancing homes and jobs if strategic housing development proceeds ([paragraph 12.25, p.191/PDF p.194; conclusions, p.194/PDF p.197](#)). That is a legitimate qualitative consideration, but it cannot substitute for demonstrating that this housing location is justified and its employment benefits deliverable. STNT's original balanced-growth objection remains: a district-wide requirement is not a site-selection justification. [Reg19 section 6, pp.26–27/PDF pp.30–31](#).

Question 2 — Clarity of DS02 criterion 2

- 1.1.4. An overarching requirement and narrower site allocations are not inherently inconsistent. The necessary clarity is what counts towards the requirement, and which provision delivers SA02's claimed homes/jobs balance. [DS02.2, p.26/PDF p.27](#), identifies E(g), B2 and small B8 uses; [proposed MM8.1–MM8.2, pp.9–10/PDF pp.10–11](#), clarify use-class notation and exclude strategic warehousing. However, the Development Specification, that forms part of the recently submitted planning application for the site (HDC ref: 26/01350) describes the broader Class E alongside B2 and B8. The Plan must distinguish its general-employment requirement from other commercial and local-centre provision, and avoid crediting the same provision twice. [Reg19 sections 8.1.5–8.1.6, p.35/PDF p.39](#).

Question 3 — SA02 location and delivery

- 1.1.5. Masterplanning can appropriately settle detailed employment locations. The unresolved issue is whether the Plan secures its promised employment outcome alongside housing within the Plan period, not whether every plot boundary is fixed now. The central issue remains the large size of the SA02 dwellings/population versus the proposed smaller number of employment on SA02 which is to exacerbate traffic outside of SA02.
- 1.1.6. The Council's [commercial assessment, site 24/8631, pp.20–21/PDF pp.23–24](#), is favourable but identifies medium-to-long-term delivery and access requirements. Commercial potential is not a dated delivery commitment. Before relying on this provision to answer STNT's dormitory-settlement objection, the Panel needs a credible relationship between housing occupations, serviced employment land, floorspace delivery and access to jobs. STNT does not demand signed occupiers for every future unit; it challenges reliance on benefits whose timing and quantum remain insufficiently defined. [Reg19 sections 8.1.5–8.1.6, p.35/PDF p.39](#).

Question 4 — Offices outside town centres

- 1.1.7. Out-of-centre offices are not prohibited, but their scale and location must be justified against the town-centre strategy. [NPPF paragraph 90\(d\)–\(e\), p.26](#), prioritises suitable town-centre provision, then appropriate edge-of-centre sites, with an explanation of how needs will otherwise be met in accessible, well-connected locations. [DS02.6, p.27/PDF p.28](#), already focuses major office development in existing centres. The flexible SA02 office component must be reconciled with that strategy, not justified merely by describing a mixed community.
- 1.1.8. Following Leicester City's initial request for a 1,000-square-metre office limit, the Councils agreed supporting text addressing the city's prime office market ([April 2026 SoCG, paragraphs 4.25–4.28, pp.7–8](#)), now [MM13.5, p.28/PDF p.29](#). That agreement is relevant, but the statement of intent does not itself establish the acceptable office scale or demonstrate compliance with paragraph 90. Nor does the later [Retail and Town Centre Study, paragraphs 1.7–1.12, p.2/PDF p.5](#): its assessed maximum main-town-centre floorspace expressly excludes offices. The remaining task is to justify the office component actually relied upon, without undermining existing centres or overstating local employment benefits. [Reg19 sections 3.2 and 8.1.6, pp.13–16 and 35/PDF pp.17–20 and 39](#).

Issue 4: Existing Employment

Question 1 — Expansion, flexibility and the Use Classes Order

- 1.1.9. The Plan provides mechanisms for protection and flexibility: [DS02.3–5, pp.26–27/PDF pp.27–28](#), differentiate Key and General Employment Areas and address loss elsewhere. STNT's concern is whether the resulting supply supports the proposed housing geography, rather than whether every employment site should be treated identically. [NPPF paragraphs 85–86, p.24](#), require both economic support and flexibility to meet needs not anticipated in the Plan.
- 1.1.10. The 2020 reforms place offices, R&D and qualifying light industry within the much broader Class E ([SI 2020/757, regulation 13](#)). Under [Use Classes Order article 3\(1A\)](#), changes within the

same class generally do not constitute development. Policy must therefore distinguish proposals requiring permission from changes it cannot control merely by allocating land. Employment assumptions should not treat a particular E(g) mix as permanently secured by designation alone. This supports, rather than replaces, the original concern about dependable access to employment. [Reg19 section 8.1.6, p.35/PDF p.39](#).

Question 2 — Protection and designation of employment areas

- 1.1.11. The distinction has an identifiable evidence base. The [employment evidence, paragraphs 11.20–11.28, pp.174–176/PDF pp.177–179](#), records site surveys assessing access, buildings, occupancy, planning history, constraints and surroundings. Key areas are commercially attractive, high-quality and significant; General areas provide a varied, fit-for-purpose portfolio that may benefit from improvement. Boundaries were reviewed against site circumstances and planning history. STNT advances no separate boundary challenge here.
- 1.1.12. Protection and improvement of existing employment areas are consistent with STNT's preference for making effective use of existing provision. But designation protects a resource; it does not establish additional capacity, delivery timing or convenient access from new housing. Those distinct propositions must remain separate when justifying the spatial strategy. [Reg19 section 6, pp.26–27/PDF pp.30–31](#).

Question 3 — DM13 outside designated areas

- 1.1.13. Retention subject to a reasonable prospect of continued employment use is an appropriate starting point. The submitted [DM13.1–2, p.145/PDF p.146](#), needs clear terminology and clear alternative routes where continued use is unsuitable. The Council's [AM24.1–AM24.2, p.56/PDF p.57](#), propose notation changes and replace “and” after criterion 2(b) with “or”. However, AM24.1's wording for criterion 6 labels R&D as E(g)(iii), whereas [the statutory classification is E\(g\)\(ii\)](#). The final descriptions and class references still need reconciliation.

- 1.1.14. The final wording should consistently distinguish the employment uses protected by criterion 1 from non-employment uses in criterion 2, and make clear how viability, marketing and environmental harm operate. That would support retention where realistic without requiring harmful or unviable uses to continue, making the framework clearer without weakening justified protection of employment. [Reg19 sections 6 and 8.1.6, pp.26–27 and 35/PDF pp.30–31 and 39.](#)

Question 4 — Bruntingthorpe Proving Ground

- 1.1.15. STNT makes no separate representation on the site's lawful uses, undertakings or operational agreements, and does not invite the Panel to determine their legal status on STNT's evidence. Its Plan-wide cumulative-impact and employment-strategy representations remain as submitted. [Reg19 sections 4.3 and 6, pp.23 and 26–27/PDF pp.27 and 30–31.](#)

Question 5 — The 500-square-metre limits and building re-use

- 1.1.16. STNT has not established a site-specific evidential basis for changing either 500-square-metre limit. Such limits are not inherently inconsistent with the wider definition of non-strategic warehousing: they may address different local constraints. For the complex north of Gartree Road, [DM13.6, p.147/PDF p.148](#), expressly permits additional development as well as re-use, subject to airfield compatibility, enterprise-continuity, traffic and other criteria; it is not a re-use-only policy. The Council should explain the differing site-specific approaches and numerical thresholds. STNT's connected point is that smaller local employment provision must be considered on its actual capacity and access characteristics, not assumed to resolve SA02's homes/jobs imbalance. [Reg19 sections 3.2 and 8.1.6, pp.13–16 and 35/PDF pp.17–20 and 39.](#)

Question 6 — Leicester Airport

- 1.1.17. Moving the provision to a transport chapter would not itself make the Plan sound. The substantive question is how [DM13.5, p.146/PDF p.147](#), operates alongside the Plan's

environmental and transport policies if aviation activity intensifies. Its eligible-use categories should not be understood as unqualified support for any scale of intensification. [SA02.7\(i\), p.84/PDF p.85](#), already requires a noise-impact assessment near the airport. The policies should operate coherently so that employment and airport activity can continue without creating an unresolved conflict with proposed housing, consistent with the [NPPF agent-of-change principle, paragraph 193, p.56](#). STNT does not assert that an unacceptable aviation impact has been demonstrated. This is a limited application of its original locational and environmental objections, not a new objection to the airport. [Reg19 section 5, pp.24–26/PDF pp.28–30](#).

Question 7 — Existing employment commitments

- 1.1.18. Existing commitments materially affect both the amount and distribution of further provision required. They must be brought into an updated supply account, distinguishing completions, extant permissions, allocations without permission, losses and remaining capacity by use and realistic delivery period. The [2024/25 AMR, Table 8, p.15/PDF p.16](#), records 59.3 hectares of remaining non-strategic supply at 1 April 2025: 10.4 office, 23.6 industrial and 25.3 storage/distribution. These net remaining-supply figures cannot simply be compared with a gross requirement for the whole 2020–2041 period.
- 1.1.19. The [AMR, paragraph 9.4, p.16/PDF p.17](#), also identifies two lapsed permissions still included because the land remains allocated. Allocation is not the same as an extant permission, although lapse does not itself make development undeliverable. For new applications, the operative development plan is the starting point ([NPPF paragraph 2, p.4](#)); following adoption, DS02, retained site allocations and DM13 would provide the relevant new framework. The Council must explain what is carried forward and avoid double counting it as additional supply. Otherwise, neither the residual employment requirement nor the claimed necessity of SA02's contribution is transparent. [Reg19 section 6, pp.26–27/PDF pp.30–31](#).

Question 8 — Necessary main modifications

- 1.1.20. STNT seeks deletion of SA02, with consequential changes to [DS02.2\(a\), p.26/PDF p.27](#), and the associated allocation, mapping and supply assumptions. The employment case adds a specific reason: the Plan should not rely on a balanced-community outcome without an adequately defined and credibly timed employment contribution. The five-hectare label does not resolve that concern when the later proposal allows equivalent floorspace, a broad use mix and subsequent phasing decisions.
- 1.1.21. This is not a contention that every employment-policy drafting defect compels deletion. If retention is advanced, the Panel should test a coherent package specifying the employment outcome and Harborough contribution, delivery alongside housing, practical implementation and compatibility with the town-centre strategy. The evidence must show that package is realistic; wording alone cannot establish it. STNT maintains deletion on its cumulative original case, without presenting the dated aggregate employment surplus as proof that all consequences of deletion are already resolved. [Reg19 sections 6 and 8.1.5–8.1.6, pp.26–27 and 34–35/PDF pp.30–31 and 38–39](#).