



Newcastle-under-Lyme Local Plan Examination in Public Hearing Statement

Matter 1b: Overarching Matters

On behalf of Persimmon Homes (North West) Ltd.

[In relation to Site Ref KL21:](#)

Land to the East and West of Quarry bank Road

Contact: Mr Jon Power (Asteer Planning)

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Prepared By: Jon Power (Director)

Aster Planning LLP, Mynshulls House, 14 Cateaton Street, Manchester, M3 1SQ

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1 INTRODUCTION

- 1.1 Asteer Planning LLP has been instructed by Persimmon Homes (North West) Ltd (“Persimmon”) to prepare this Hearing Statement in relation to the Newcastle-under-Lyme (“NUL”) Local Plan 2020-2040 Submission Draft (“Submission Plan”) and the Matters, Issues and Questions (“MIQs”) posed by the Inspector.
- 1.2 Persimmon controls land to the East and West of Quarry Bank Road in Keele (“the site”) (Site Reference KL21¹) which has been promoted through the entirety of the Local Plan process. The site is wholly deliverable (being suitable, available and achievable) for residential development and could deliver significant public benefits, as demonstrated robustly by the evidence presented in duly made representations in August 2023 (at Regulation 18 Stage) and in October 2024 (at Regulation 19 Stage), which have been supported by a detailed Development Statement and Masterplan.
- 1.3 This Statement responds directly to the Inspectors MIQs at Matter 1b; however, it should be read in parallel with our detailed Regulation 19 representations. Separate statements have been prepared in respect of the following matters and should be read in conjunction with this Hearing Statement:
- Matter 2 – Spatial Strategy
 - Matter 3 – Green Belt
 - Matter 4 – Housing Requirement
 - Matter 5 – Housing Supply
 - Matter 6 – Allocations
- 1.4 It is our view that there is the potential to consider Main Modifications to the Submission Plan based on the MIQs posed by the Inspector at Matter 1b, including:
1. Extending the Plan Period to a minimum of 15 years from the adoption of the Plan, to ensure consistency with National Policy.

¹ Site Reference in the Evidence Base, including Site Selection Report and Assessments (Document ED029), SHLAA (Document ED006a) and Sustainability Appraisal (Document CD04)

2. As a minimum (and without prejudice to comments on the soundness of NUL's housing requirement in accompanying Hearing Statements) preparing a Main Modification to the Submission Plan to ensure implementation of a robust Local Plan Review trigger mechanism, to ensure consistency with the transitional arrangements in newly implemented national policy.

2 PLAN PERIOD AND LOCAL PLAN REVIEW

PQ1.12: Is the Plan period (2020 – 2040) justified, effective and consistent with national policy which requires strategic policies to look at least 15 years ahead from adoption? Should the requirements/timescales for review of the Plan be set out in policy?

2.1 To be effective and consistent with national policy, Persimmon consider that the Plan Period should, as a minimum, be extended cover a period up to 2041. The Council currently anticipates that the Local Plan will be adopted in Quarter 4 2025 and, therefore, its strategic policies to 2040 would not be consistent with the National Planning Policy Framework (“NPPF”), which expects Development Plans to look ahead over a minimum 15 year period from adoption². If the Plan Period was modified to cover the period 1 April 2024 to 31 March 2041, strategic policies should also be modified to set out revised housing and employment land requirements.

2.2 Annex 1 of the new NPPF (December 2024), sets out the transitional arrangements for plan making, noting that Local Plans submitted before 12th March 2025 will be examined under the previous (2023) NPPF. Whilst NUL has submitted its plan to satisfy these transitional arrangements (subject to it being found sound), Paragraph 236 of the new NPPF states:

“Where paragraph 234b applies³, if the housing requirement in the plan to be adopted meets less than 80% of local housing need the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need”.

2.3 Based on the Government’s new Standard Method, NUL’s housing requirement has risen to 550 dwellings per annum (“dpa”) based on the Government’s implemented changes to the Standard Method for calculating Local Housing Needs (“LHN”) – this compares to:

- A 330 dpa requirement using the 2023 Standard Method for calculating LHN – representing an increase of 220 dpa or a 67% uplift; and

² NPPF (2023), Paragraph 22

³ Paragraph 234b refers to where a “plan has been submitted for examination under Regulation 2284 on or before 12 March 2025” (NPPF Annex 1)

- A 400 dpa requirement based on the Submission Plan - representing an increase of 150 dpa or a 38% uplift – therefore falling significantly short of the 550 dpa figure in the new Standard Method for calculating LHN.

2.4 Based on the above, NUL will only be delivering 73% of its updated LHN using the new Standard Method, and therefore triggers the need for an immediate review of the Local Plan once it is adopted (if it is found sound). Persimmon therefore recommend that, as a minimum and without prejudice to comments on the soundness of NUL’s housing requirement in accompanying Hearing Statements, a modification should be made to the Submission Plan to ensure implement a robust review trigger, to ensure consistency with National Policy.

2.5 This modification should include a trigger requirement for the commencement and completion of an immediate full review of the Local Plan following adoption. This must include clear timelines and milestones, and stringent penalties if the Council fails to progress an appropriate Local Plan within a reasonable timescale. Bedford Borough Council’s Local Plan (2030), which was adopted on 15th January 2020, provides an example of a robust review mechanism with set timescales for review. Policy 1 (Reviewing the Local Plan 2030) of the 2030 Bedford Local Plan states that

“The Council will undertake a review of the Local Plan 2030, which will commence no later than one year after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies in the Local Plan 2030 which are most important for determining planning applications for new dwellings will be deemed to be ‘out of date’ in accordance with paragraph 11 d) of the National Planning Policy Framework 2019⁴”.

2.6 Bedford subsequently submitted its Local Plan review for Examination to the Secretary of State on 12th January 2023, in order to meet this deadline and demonstrating the effectiveness of a time specific review mechanism.

⁴ Bedford Local Plan 2030 – Policy 1