



Local Plan Examination: Response to Matter 2

DATE:	01 May 2025	CONFIDENTIALITY:	Public
SUBJECT:	Written Statement responding to Matters, Issues and Questions		
PROJECT:	Newcastle Under Lyme Local Plan Examination	AUTHOR:	WSP on behalf of Harworth Group PLC and Graham Ward Farms Limited

RESPONSE TO MATTER 2

Introduction

This response is submitted by WSP on behalf of Harworth Group PLC (“Harworth”) and Graham Ward Farms Limited (taken together, “our clients”) in relation to Matter 2 Questions 2.1, 2.3, 2.4 and 2.7.

For context, Harworth are the owners and developers of Chatterley Park, part of the existing employment land supply, which has an existing consent for commercial uses and is actively being developed (hence not subject to any allocation in the submission version of the Local Plan, with saved Local Plan Policy E2 to be deleted). Our clients are the joint promoters of ‘Land off Talke Roundabout / A500’, which was previously assessed in the Local Plan preparation under ref: TK30 and considered a potential strategic allocation for development. This is an “omission site” and we recognise the Inspector will not, at this stage, be considering the merits of sites for development not included in the Plan.

This should be read in conjunction with our original representations to the Plan including the cover letter from WSP dated 4 October 2024 and “Developer Representation: Housing and Economic Growth Evidence” (October 2024).

Response to Question 2.1

“Is the proposed spatial strategy and the distribution of development (as set out in policies PSD2 and PSD3) supported by robust and up to date evidence and otherwise soundly based?...”

Our clients consider that the proposed spatial strategy and the distribution of development (as set out in policies PSD2 and PSD3) is not soundly based, and does not reflect the vision and objectives of the Plan.

The Vision states (our emphasis):

“By 2040, the Borough will have delivered sustainable new homes and jobs meeting local needs and providing more opportunities for people to enjoy quality of life. We will have delivered or on the journey to delivering a sub-regional exemplar business park at Junction 16 of the M6 Motorway to support sustainable economic growth and take advantage of the accessibility of the Borough to the wider strategic transport network...”

SO-2 (II) states:

“Diversify the Borough’s employment base and deliver employment sites which will benefit economic growth for the region focusing on sectors: advanced manufacturing, distribution and logistics, supporting technology, and the green economy to generate more skilled jobs for local people.”

The spatial strategy and proposed housing allocations do not provide sufficient new homes to meet local needs. WSP’s “Developer Representation: Housing and Economic Growth Evidence” (October 2024) deems that the Local Plan is not sound as it fails to meet evidenced needs, indicating that the Borough will

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likely face a shortage of 1,181 homes by 2042 (note these comments related to the Final Draft Local Plan, but, as this issue was not rectified prior to submission, this is also applicable to the Submission version).

The spatial strategy and sites proposed to be allocated for employment also do not deliver jobs to meet local needs, and fails to take advantage of the accessibility of the Borough. WSP’s “Developer Representation: Housing and Economic Growth Evidence” (October 2024) concludes that the estimated land requirement for warehouses in NULBC is approximately 45.6ha by 2040, which is significantly higher than the 24.3 to 33 hectares projected in NULBC’s latest HENA update (2024). By 2042, the land requirement for B8 Class will further increase to 51.6 hectares in the Borough. However, the FDLP has allocated only 63 hectares of employment land in total, which, if not adjusted to account for warehousing needs, risks creating significant supply shortages across all land uses, including General Industrial (B2) and office spaces. Insufficient employment land limits job diversity by restricting space for key sectors to grow, reducing opportunities for skilled jobs and innovation. This narrows the local employment base, hinders economic resilience, and weakens the Borough’s ability to adapt to changing industry needs.

Response to Question 2.3

“What other spatial strategies and distributions of growth were considered during plan preparation, and why were they discounted? Where is the evidence for this? Were alternative approaches tested in the Sustainability Appraisal work?”

We anticipate that the LPA will have considered an alternative spatial strategy to allocate three (rather than two) strategic sites in the Local Plan; One of the evidence base documents, the Strategic Employment Site Assessment Report (April 2023), which was prepared by Aspinall Verdi, concluded that there is a clear regional rationale for the allocation of at least two Strategic Sites in Newcastle-under-Lyme (paragraph 11.5). The subsequent Strategic Employment Sites Assessment – 2024 Update (June 2024), prepared by Aspinall Verdi provides their professional opinion that there is a need for two Strategic Sites in the new local plan, which should be AB2 (‘Land at J16 of the M6’) and KL15 (‘Land at Barkers Wood, (Keele University) Keele’). The Final Draft Local Plan proposes that only two of the three sites are allocated. Talke Park is not proposed for allocation, and is proposed to remain in the Green Belt. It is not clear why this spatial strategy for more growth was discounted. As detailed in the cover letter from WSP dated 4 October 2024, Harworth has received significant interest from a range of large national and international businesses to Chatterley Park, attracted by the central location, access to the motorway network and ability to service major conurbations in all of the North West, East and West Midlands. This site and Talke Park are aimed at different uses to the two proposed Strategic Sites (AB2 seeks to support a sub-regional logistics focused employment development and KL15 seeks to support the expansion of the existing science park and create an innovation zone, linked to research and innovation of Keele University).

Response to Question 2.4

“Have the sites allocated for development in the Plan been appraised and selected in comparison with possible alternatives using a robust and objective process?...”

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The sites allocated for development in the Plan have not been appraised and selected in comparison with possible alternatives using a robust and objective process. The decision to allocate two of the three potential strategic sites appears to be informed by the Strategic Employment Sites Assessment – 2024 Update (June 2024), prepared by Aspinall Verdi. WSP submitted representations to the Final Draft Local Plan stating that some of the assumptions made in reaching this conclusion are incorrect. It is not clear how the site selection process led to the allocation of AB2 and KL15, but discounted Talke Park.

Response to Question 2.7

“Are there any omissions in the policies and are they sufficiently flexible? Are there any proposed modifications to the policies and are these necessary for soundness?”

Our clients consider that there are omissions in the policies, and insufficient flexibility. Our proposed modifications are listed in the cover letter from WSP dated 4 October 2024, and are summarised as:

- Policy PSD1 – the inclusion of the site under point 3 as a strategic site “Land off Talke Roundabout / A500 to offer a sustainable urban extension providing a strategic employment location, new homes, and public space”;
- Policy PSD5 – the site should be listed for removal from the Green Belt;
- Policy PSD3 – the figures in terms of housing and employment provision should be updated to account for the allocation of TK30.
- Addition of a new Policy TK30 relating to the site’s development, with suggested wording in the cover letter from WSP dated 4 October 2024.

We also consider that the period which the Local Plan covers should be extended beyond 2040, and cover up to 2042 as a minimum and ideally to 2045.