



Local Plan Examination: Response to Matter 3

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 3

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 3 Questions 3.4, 3.8, 3.9 and 3.10.

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, “Developer Representation: Housing and Economic Growth Evidence” (October 2024), the Talke Park Vision Document (October 2024), and the letter from Wendy Lancaster at Tyler Grange dated 30th September 2024.

Response to Question 3.4

“The Council has produced a Green Belt Assessment (ED8, 8a, 8b, 8c). Is the Council’s approach to assessing Green Belt appropriate? What are your reasons for this view?”

The Council’s approach to assessing Green Belt in the Green Belt Assessment (ED8, 8a, 8b, 8c) is not appropriate. It does not take account of updated evidence provided by our client to the submission version including the letter from Wendy Lancaster at Tyler Grange dated 30th September 2024. The Green Belt Assessment also fails to consider the implications of the Grey Belt as introduced by the NPPF2024 and should be revisited (see response to 3.9 and 3.10 below).

Response to Question 3.8

“Is the Council’s decision to not include safeguarded land soundly based?”

There is no sound basis to the Council’s decision to not include safeguarded land” and not elaborate in the statement/ session. As detailed at 4.2.1 of the “Developer Representation: Housing and Economic Growth Evidence” (October 2024), there is a risk that the housing shortfall will continue to grow unless more sites are allocated and considered deliverable before 2045.

Response to Question 3.9

“How relevant to this Examination are the provisions of the NPPF2024?”



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The provisions of the NPPF2024 are very relevant to the Examination. The Grey Belt is now established in the NPPF which is a material planning consideration in the determination of any application. Therefore, whilst the Plan could in principle be examined under the NPPF December 2023, this would mean upon adoption it would be out of date, as any applications pertaining to the Green Belt would be considered against the NPPF2024. The Local Plan should therefore be revisited in light of the NPPF2024. Paragraph 148 states *“where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations”*. The LPA have done undertaken an assessment to establish whether any sites are Grey Belt and therefore this approach has not been followed.

Response to Question 3.10

“If you consider this to be the case, which sites within the Green Belt Review would be considered to be Grey Belt?”

Talke Park (TK30) is an omission site (i.e. not allocated in the submitted Local Plan) albeit it is within the Green Belt review and therefore relevant to this question. The LPA’s own evidence base confirms that this site should be considered to be Grey Belt; ED8 confirms on page D-53 that TK30 makes a weak contribution to Purpose 1 (to check the unrestricted sprawl of large built-up areas), a weak contribution to Purpose 2 (to prevent neighbouring towns merging into one another) and no contribution to Purpose 4 (to preserve the setting and special character of historic towns). NPPF2024 is clear in Annex 2: Glossary that land which does not strongly contribute to any of these purposes is Grey Belt for the purposes of plan-making and decision-making. The NPPF2024 definition does elaborate that Grey Belt excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development. The potential site constraints of Talke Park have been assessed in the Talke Park Vision Document (October 2024), which demonstrates there are no areas of assets in footnote 7 pertaining to the site which would provide a strong reason for refusing or restricting development. For example, a scheme can be delivered to ensure no harm to the significance of the Wedgwood Monument, a Grade II Listed Building, c.140m from the site boundary. Also, whilst detailed survey work would need to be completed to inform a planning application, it is considered that the proposed development would be able to accommodate mitigation requirements and enhancements for BNG.