

# Hearing Statement – Matter 4

For The Strategic Land Group Ltd | 17-426

Newcastle Under Lyme Local Plan 2020-2040 examination

Project: 17-426  
Hearing: Matter 4  
Client: The Strategic Land Group Ltd  
Date: 30 April 2025

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# 1. Introduction

- 1.1 Emery Planning is instructed by The Strategic Land Group Ltd (hereafter referred to as “SLG”) to attend the examination of the Newcastle Under Lyme Local Plan 2020-2040. SLG is promoting draft allocation TK27: Land off Coppice Road, Kidsgrove.
- 1.2 This hearing statement sets out our response to the Inspector’s Matters, Issues and Questions in relation to Matter 4 – The Housing Requirement. It should be read in conjunction with our detailed representations to the Regulation 19 Pre-Submission Draft of the plan and our other Hearing Statements submitted to the examination.



## 2. SLG response to the Inspectors' questions

Issue 4 - Is the identified housing requirement in table 2 justified and consistent with national policy?

Q4.1 Is the housing requirement of 8,000 homes during the 2020-2040 period (policy PSD1) a figure of 400 dwellings per annum (dpa), justified by the Council's evidence? Are the assumptions of the 2024 Housing and Economic Development Needs Assessment and Addenda (ED001) soundly based, particularly in relation to:

- a) Identifying a baseline figure;
- b) Forecasts for economic growth;
- c) Alignment of jobs and workers; and
- d) Assumptions of housing requirements arising from economic growth.

2.1 The current Local Housing Need for Newcastle under Lyme is 330 dwellings per annum (dpa). However, national policy and guidance is clear that local housing need is used to determine the minimum number of homes needed. Paragraph 2a-010 of the NPPG provides the following guidance:

**“When might it be appropriate to plan for a higher housing need figure than the standard method indicates?”**

The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);



- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”

- 2.2 Paragraph 2a-015 of the Framework provides the following in relation to how such an approach would be tested at examination:

**“If authorities use a different method how will this be tested at examination?”**

Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.”

- 2.3 The PPG recognises at paragraph 2a-010 that the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. If the amount of housing growth is not sufficient to align with jobs growth, this will serve to constrain economic growth and place significant strain on the housing market due to the additional demand. It would also worsen affordability further if the jobs growth is not matched with sufficient housing growth.
- 2.4 The relationship between the amount of jobs growth, employment land and housing is summarised in the Warrington Local Plan Inspector’s report (October 2023), which states at paragraph 62:

“We do not suggest that there needs to be an absolute match between employment land provision, estimated jobs growth and labour supply or that such an absolute match is even possible. However, there needs to be broad alignment, at least, in order for the local economy and housing market to function effectively and to avoid substantial increases in unsustainable commuting patterns.”

- 2.5 The need to provide enough housing to accommodate economic growth was also recognised in the Doncaster Local Plan, where LHN equated to 553 dpa but the plan requirement is 920 dpa. The Inspector’s report (June 2021) states at paragraph 56:

“The significant uplift is intended to allow additional people to live in the Borough to ensure a sufficient working population to take account of the number of additional jobs that the Plan aims to accommodate.”



- 2.6 Similarly, a higher housing requirement than LHN was adopted in the St Helens Local Plan to align with economic growth aspirations. The Inspector's report (May 2022) states at paragraph 54:

"The PPG also makes it clear that other circumstances might also justify a higher figure. In the case of St Helens, the 486 dpa is justified to correlate with the aspirations to achieve increased economic growth and jobs which are likely to lead to increased housing need and demand."

- 2.7 The circumstances in Newcastle-under-Lyme justify the application of an alternative method to determine local housing need, in accordance with the Framework and paragraph 2a-010 the NPPG. Specifically, the housing need associated with planned and projected employment growth is likely to significantly exceed that set out in the standard method. The PPG recognises at paragraph 2a-010 that the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. If the amount of housing growth is not sufficient to align with jobs growth, this will serve to constrain economic growth and place significant strain on the housing market due to the additional demand. It would also worsen affordability further if the jobs growth is not matched with sufficient housing growth.
- 2.8 The Housing and Economic Development Needs Assessment (2024) (HEDNA, ED001) provides an assessment of local housing and employment needs over the plan period (2020–2040). To support forecast economic growth and associated increase in the working age population, the HEDNA identifies a need to deliver approximately 8,000 dwellings (400 dwellings per annum) over the plan period (2020– 2040).
- 2.9 SLG considers that the HEDNA represents a robust assessment of housing need having regard to economic considerations. It therefore provides an appropriate basis for the proposed housing requirement.
- 2.10 Another important material consideration is that under the new standard method, local housing need for Newcastle-under-Lyme has increased from 330 dpa to 550 dpa. Therefore, whilst a requirement of 400 dpa does not come close to meeting the new local housing need (this will need to be addressed through the review of the plan), it is positive that the Council is planning for a higher figure than just the previous standard method (330 dpa), as it at least goes some way to closing the gap that will need to be addressed in the future.



**Q4.2 In relation to Affordable Housing Needs, is the identified need for 278 dpa been based on robust, up-to-date information? How has this been considered in the overall housing requirement? Based on the thresholds and requirements in Policy HOU1, will affordable housing needs be met? How will the “Golden Rules” in the NPPF2024 impact upon affordable housing provision in the Plan?**

- 2.11 As discussed under Matter 3, the Golden Rules do not apply to this plan and the proposed allocations. But in any event, the plan is supported by a Viability Study (ED004) which clearly demonstrates that 50% affordable housing is not viable across the plan area. Paragraph 67 of the Framework is clear that less than 50% affordable housing is acceptable if a higher proportion would make the development of sites unviable.

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