



Local Plan Examination: Response to Matter 4

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 4

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 4 Question 4.1.

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 4.1

“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?...”

The housing requirement of 8,000 dwellings, or 400 dwellings per annum (dpa) over the 2020–2040 plan period, as set out in Policy PSD1, is not sufficiently justified by the Council’s evidence base, including the most recent HENA updates and the HSDPS. While the proposed figure marginally exceeds the Local Housing Need Figure (LHNF) of 347 dpa cited in earlier assessments, it does not reflect the full scale of housing need indicated by more recent data. Notably, the Government’s proposed standard method in July 2024 suggested a requirement of 593 dpa, later revised to 545 dpa and adopted in December 2024. WSP’s own assessment “Developer Representation: Housing and Economic Growth Evidence” (October 2024)”, prepared during the NPPF consultation period, used a midpoint between versions to arrive at a need of 461 dpa, will be adjusted to 438 dpa following the December revision. These figures all significantly exceed the Council’s 400 dpa, indicating that the Local Plan underestimates true housing needs.

The Council’s approach risks long-term delivery shortfalls, particularly when considered alongside housing supply metrics. Based on the new standard method (545 dpa), the Borough’s five-year housing land supply (5YHLS) would be just 3.59 years, well below the 5-year requirement. Even using the adjusted midpoint figure (438 dpa), the supply remains inadequate at 4.46 years. These shortfalls raise serious concerns about the plan’s deliverability and its capacity to respond to future needs.

Although the Plan may be examined under the transitional NPPF, it will be judged against the new standard method figures upon adoption. Without an upward revision to the housing requirement and a more robust



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supply strategy, the Council risks a persistent housing deficit, weakened policy performance, and misalignment with national policy objectives.