



Newcastle-under-Lyme Local Plan Examination

Matter 4 – The Housing Requirement

May 2025



[gladman.co.uk](https://www.gladman.co.uk)



01260 288888

MATTER 4: THE HOUSING REQUIREMENT

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

Policy SP2

4.1 Given 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.

1.1.1 The Council has set a housing requirement which is higher than the relevant standard method as recommended at paragraph 61 of the December 2023 NPPF. The methodology is set out in previous National Planning Practice Guidance which was relevant at the time of the Final Draft Local Plan 2024 (Regulation 19) consultation.

1.1.2 Gladman welcome the Council being proactive by using its 'Housing and Economic Needs Assessment' (HENA) 2024 derived figure (400 dwellings per annum (dpa)) over the plan period rather than the former local housing need figure of 347 dpa. The modelling undertaken in the HENA suggests that exactly 400dpa could be needed to accommodate this growth and support the creation of 237 jobs every year to 2040. The 400dpa annualised housing requirement would roughly align with the average housing delivery in the borough over the last five monitoring years (2020-2025 – 2,071 net housing completions, which equates to an average housing delivery of 414

dpa. The NPPF supports the delivery of housing above the standard method where it is justified by a local economic strategy.

- 1.1.3 However, Gladman suggest that the Council will need to include a strong review policy within the emerging Local Plan due to the changes introduced through the revised National Planning Policy Framework (December 2024). The local housing need figure, as calculated by the Government's standard methodology, for Newcastle-under-Lyme is 550dpa which will require the Council to prepare a new Plan immediately following adoption.
- 1.1.4 In line with the provisions of the December 2024 Framework (paragraphs 234b & 236 respectively) for local plan making, where a local plan has been submitted for examination on or before the 12th March 2025 and the emerging Local Plan provides for less than 80% of local housing need (72.7% in the case of Newcastle-under-Lyme BC), the local planning authority will be expected to begin work on a new local 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 – anticipated to be summer / autumn 2025) in order to address any shortfall in housing need.
- 1.1.5 The Council has included indicative dates for the preparation of a new Local Plan under the new local plan-making system within its most recent Local Development Scheme (February 2025).
- 1.1.6 Within the NPPF, a range of proposed transitional arrangements are outlined intended to facilitate the meeting of higher housing requirements without stagnating the plan-making process. published Local Housing Need figure will be expected to commence plan-making in the new system at the earliest opportunity to address the shortfall in housing need.
- 1.1.7 As such, Gladman recommend an immediate review of the Local Plan to ensure that the new local housing need figure is accommodated as soon as possible. Gladman recommends the following policy wording is inserted into the Local Plan to ensure

that the Plan remains up to date and in line with national policy. The following wording is suggested below:

Policy XX: Reviewing the Newcastle-under-Lyme Local Plan

- 1.1.8 *The Council will undertake an immediate review of the Newcastle-under-Lyme Local Plan. An updated plan will be submitted for examination no later than 30 months after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies relating to the supply of land will be deemed out of date in accordance with paragraph 11d) of the National Planning Policy Framework. The reviewed plan will secure levels of growth that accord with the Standard Method and any growth deals that have been agreed.*
- 1.1.9 Should there be a housing requirement for designated neighbourhood areas within the Plan? (paragraph 66 in the NPPF) If so, what should this be?
- 1.1.10 No. Draft Policy PSD1 of the Local Plan sets out the indicative levels of housing growth each settlement is allocated to deliver a proportionate amount over the plan period.
- 1.1.11 In light of the above, Gladman question whether it is necessary for the draft Local Plan to set housing requirements for neighbourhood areas.