



Examination into the Soundness of  
Newcastle-under-Lyme's Local Plan.

## **Matter 5- Housing Supply**

Matter Statement by Newcastle-under-  
Lyme Borough Council

May 2025

# 1. Introduction

This statement sets out the Council's response to the Inspector's Matters regarding Housing Supply.

All documents referenced in this statement are listed in Appendix 1.

**Issue 5 - Does the Plan provide an appropriate supply of deliverable and developable sites to meet identified needs and do these align with national policy?**

**Qu 5.1 Are the assumptions that have been made to inform the trajectory justified in relation to the delivery of housing sites, in particular in relation to:**

**a) lead in times for grant of full permissions, outline and reserved matters and conditions discharge;**

**b) site opening up and preparation; and dwelling build out rates?**

5.1.1 The Council's approach to lead in times and build out rates has been informed by the approach set out in the Strategic Housing and Employment Land Availability Assessment (Methodology 2024) [ED006, para 3.11 – 3.14] but also in the drafting of the updated Housing Land Paper and Trajectory [EX/NBC/04]. In undertaking that update Council officers have contacted the owners/developers of sites with planning permission to understand the expected housing trajectory for the sites which has informed some of the considerations in the paper, consistent with para 3.14 of the Strategic Housing and Employment Land Availability Assessment [ED006].

5.1.2 In respect of proposed allocations in the Local Plan, the Council has engaged with site promoters to understand their intentions for site delivery. Statements of Common Grounds (SOCG) have been signed that outline the delivery intentions for sites and confirm that there are no legal or other constraints to bringing the sites forward [EX/NBC/04, Appendix 3].

**Qu 5.2 Is there a reasonable prospect that a total of 1648 new dwellings will be provided on sites that had planning permission at March 2024?**

- 5.2.1 The evidence set out in the Housing Supply Paper and Trajectory [EX/NBC/04, Appendix A] for Category A sites supports the identification of the 1,648-dwelling figure in the housing trajectory. This is considered to demonstrate a reasonable prospect that those sites identified will come forward as indicated in the trajectory.

**Qu5.3 Is there a reasonable prospect that the total of 5195 new dwellings to be delivered through Local Plan allocations?**

- 5.3.1 There is a reasonable prospect that in the order of 5,195 new dwellings will be delivered through the implementation of Local Plan allocations. Appendix 3 of the Housing Supply Paper and Trajectory [EX/NBC/04] contains information about Category A sites that have planning permission currently and for Category B sites, there are signed SOCG to provide evidence and confidence that the Local Plan allocations will be delivered by the end of the Plan period and in the broad timescales assumed in the document.

**Qu 5.4 Is there compelling evidence to justify a windfall allowance of 756 over the plan period and to demonstrate that they will provide a reliable source of supply?**

- 5.4.1 As set out in the Housing Supply Paper and Trajectory [EX/NBC/04, paras 5.7-5.9 and table 3] there has been a trend of windfall site completions in the borough since 2008. These typically comprise of change of use, conversions, and sites not identified through the published SHELAA. An average windfall allowance has been applied in the trajectory from year 4 onwards to reduce the potential for the double counting of existing planning approvals in the preceding years.

**Qu 5.5 Has appropriate consideration been given to non-implementation lapse rates?**

- 5.5.1 There is no requirement in the NPPF to include a lapse rate. The Council has not included a lapse rate in its calculation of housing supply. However, it is considered that in general terms, an overall housing supply of 9,670 homes compared to a housing requirement of 8,000 (which results in an approximately 21% supply flexibility) is sufficient to absorb any non-implementation of sites. It provides resilience to housing land supply.
- 5.5.2 For a considerable proportion of the proposed allocations, the Council has published SOCG noting an intention from the site promoter to bring the respective site forward for development [EX/NBC/04, Appendix 3]. The proposed allocations supported by SoCG are listed below: -

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Table 1: Local Plan Allocations with Statements of Common Ground

Number	Site Reference	Site Address	Owner / Developer	Capacity	Estimated 5-year completions total	Page Ref in Appendix 3 of EX/NBC/04
1	AB12	Land East of Diglake Street	Staffordshire County Council	125	125	91-95
2	AB15	Land North of Vernon Avenue	Nigel Holland	33	33	96-100
3	AB33	Land off Nantwich Road / Park Lane, Audley	Staffordshire County Council	55	55	101-105
4	BL18	Clough Hall, Talke	Staffordshire County Council	150	150	106-110
5	BL32	Land at Congleton Road, Butt Lane	Josephine Elaine Brookes	20	20	111-114
6	CH14	Maryhill Day Centre, Wilnot Drive	Staffordshire County Council	30	30	115-118
7	CT1	Land at Red Street	Mr Fradley, EM Baskeyfield, N.Baskeyfield and TN Baskeyfield	550	230	119-124
8	KL13	Keele Science Park	Keele University	220	0	126-131
9	KL15	Land South of A525 Keele University	Keele University	260	0	126-131
10	KS11	Knutton Community Centre, High Street, Knutton	Aspire Housing	21	21	89 & 133-136

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Number	Site Reference	Site Address	Owner / Developer	Capacity	Estimated 5-year completions total	Page Ref in Appendix 3 of EX/NBC/04
11	KS17	Knutton Recreation Centre, Knutton Lane	Aspire Housing	54	54	90 & 133-136
12	KS18	Land North of Lower Milehouse Lane, Knutton	Aspire Housing	10	10	132-136
13	KS19	Land at Knutton Lane	Aspire Housing	5	5	132-136
14	KS3	Land at Blackbank Road	Staffordshire County Council	150	150	137-142
15	LW53	Land at Corner of Muckleston Wood Lane, Loggerheads	Shropshire Homes	150	110	143-147
16	MD29	Land North of Bar Hill	Lone Star Land Limited	150	125	148-152
17	NC13	Land at Bullockhouse Road	Bloor Homes	100	100	153-156
18	SP11	Lyme Park	Newcastle-under-Lyme Borough Council	900	120	157-160
19	SP2	Cheddar Drive, Silverdale	Aspire Housing	14	8	161-165
20	SP22	Former Playground Off Ash Grove, Silverdale	Aspire Housing	42	42	166-170
21	SP23	Land at Cemetery Road / Park Road	Richborough Estates	200	110	171-175
22	TB19	Land South of Newcastle Golf Club, Thistleberry	Richborough Estates	550	270	176-180



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Number	Site Reference	Site Address	Owner / Developer	Capacity	Estimated 5-year completions total	Page Ref in Appendix 3 of EX/NBC/04
23	TB23	Land West of Galingale View	Persimmon Homes	124	100	181-185
24	TC19	Hassell Street Car Park	Newcastle-under-Lyme Borough Council	5	5	187-193
25	TC20	King Street Car Park	Newcastle-under-Lyme Borough Council	10	10	187-193
26	TC40	Blackfriars Road Car Park	Newcastle-under-Lyme Borough Council	10	10	187-193
27	TC50	Cherry Orchard Car Park	Newcastle-under-Lyme Borough Council	5	5	187-193
28	TC52	Goose Street Car Park	Newcastle-under-Lyme Borough Council	25	0	187-193
29	TC22	Marsh Parade (fomer Zanzibar Nightclub)	Aspire Housing	60	60	194-198
30	TC7	Land bound by Ryecroft	Newcastle-under-Lyme Borough Council	214	214	199-203
31	TC71	Midway Car Park	Newcastle-under-Lyme Borough Council	111	111	204-208
32	TK10	Land at Crown Bank, Talke and Butt Lane	Dr Hodgkinson	170	90	209-213
33	TK17	Land off St Martins Road, Talke	Araripe Limited	40	40	214-218
34	TK27	Land off Coppice Road, Talke	Paul Smith Strategic Land Group	90	90	219-223

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Number	Site Reference	Site Address	Owner / Developer	Capacity	Estimated 5-year completions total	Page Ref in Appendix 3 of EX/NBC/04
35	TK6	Site at Coalpit Hill	Staffordshire County Council	10	10	224-227
Total				4663	2513	

**Qu 5.6 What assumptions have been made in relation to the provision and delivery of student housing? Are these consistent with national policy?**

- 5.6.1 For student accommodation, the position of the Council is considered to be consistent with the planning practice guidance in including student accommodation in principle (PPG, Paragraph: 025, Reference ID: 68-034-20190722, Revision Date: 22 July 2019). The Council has reviewed Census data (from 2011) and has applied a ratio of 2.5 to relevant student accommodation schemes as required to assume the release of one self-contained home [EX/NBC/04, paras 5.10 – 5.16]. The delivery of student accommodation has been assessed through consultation with landowners / developers and build rates assessed in the Strategic Housing Land Availability Assessment.

**Qu5.7 Overall, is there convincing evidence that:**

**a) Having regard to assumptions about commitments, allocations and windfalls the housing requirement across Newcastle under Lyme between 2020 and 2040 is likely to be met?**

5.7.1 Yes. It is the Council's position that, taking into account commitments, allocations and windfalls, a total of 9,670 dwellings will be delivered that provides for a circa 21% supply flexibility, compared with the annual housing requirement of four hundred (or Plan requirement of 8,000) contained within the Local Plan.

**b) A 5-year supply of deliverable housing land will exist on adoption?**

5.7.2 Yes. It is the Council's position, as set out in the Housing Supply and Trajectory Paper, that a five-year supply of housing will exist on adoption of the Local Plan [EX/NBC/04 pg. 12, Table 8] of between 10.1 and 11.3-years supply on the basis of 400 dwellings per annum.

**c) The Plan provides specific, developable sites to provide a supply of deliverable or developable housing land is likely to exist throughout the plan period?**

5.7.3 As set out in the Council's housing trajectory [EX/NBC/04a], there are a number of developable sites that are intended to deliver over the Plan period and beyond the initial 5-year period, post adoption [EX/NBC/04a]. These are shown in the housing trajectory as delivering over the period 2030/31 – 2034/2035. This includes sites such as SP11 Lyme Park, Silverdale. In line with paragraph 68 of the National Planning Policy Framework ("NPPF") the Council is only required to identify either broad locations for growth or a supply of specific sites for years 11-15, where possible. In fact, as the trajectory shows the Council has identified specific sites sufficient to provide 9,670 units over the plan period.

5.7.4 It is also important to note that in line with transitional arrangements contained within the 2024 NPPF [paragraphs 234b & 236] there is an expectation that the Council begin work on a new 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 in 2025 in order to address any shortfall in housing need against the local housing need figure established in the 2024 NPPF. The focus on meeting housing need may lead the Council to make additional allocations that will supplement its housing offer in the later years of the Plan period through a new Local Plan.

## 2. Appendix 1 – List of Reference Documents

A. The Council's evidence for housing supply is set out below.

**B. National Policy:**

- National Planning Policy Framework (2023 and 2024)
- National Planning Practice Guidance

**C. Government Regulations and Acts:**

- Town and Country Planning Act
- Planning and Compulsory Purchase Act 2004

**D. Newcastle-under-Lyme Local Plan Submission / Examination Documents**

- EX/NBC/04 Housing Land Paper and Trajectory
- EX/NBC/04a Housing Trajectory (A3 Size)
- ED006 Strategic Housing and Employment Land Availability Assessment Methodology
- ED006 Strategic Housing and Employment Land Availability Assessment

**E. Statements of Common Ground**

- Newcastle-under-Lyme Borough Council and various site promoters [EX/NBC/04]