



Newcastle-under-Lyme Local Plan Examination in Public Hearing Statement

Matter 5: Housing Supply

On behalf of Persimmon Homes (North West) Ltd.

[In relation to Site Ref KL21:](#)

Land to the East and West of Quarry bank Road

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1 INTRODUCTION

- 1.1 Asteer Planning LLP has been instructed by Persimmon Homes (North West) Ltd (“Persimmon”) to prepare this Hearing Statement in relation to the Newcastle-under-Lyme (“NUL”) Local Plan 2020-2040 Submission Draft (“Submission Plan”) and the Matters, Issues and Questions (“MIQs”) posed by the Inspector.
- 1.2 Persimmon controls land to the East and West of Quarry Bank Road in Keele (“the site”) (Site Reference KL21¹) which has been promoted through the entirety of the Local Plan process. The site is wholly deliverable (being suitable, available and achievable) for residential development and could deliver significant public benefits, as demonstrated robustly by the evidence presented in duly made representations in August 2023 (at Regulation 18 Stage) and in October 2024 (at Regulation 19 Stage), which have been supported by a detailed Development Statement and Masterplan.
- 1.3 This Statement responds directly to the Inspectors MIQs at Matter 5; however, it should be read in parallel with our detailed Regulation 19 representations. Separate statements have been prepared in respect of the following matters and should be read in conjunction with this Hearing Statement:
- Matter 1b – Overarching Matters
 - Matter 2 – Spatial Strategy and Site Selection
 - Matter 3 – Green Belt
 - Matter 4 – Housing Requirement
 - Matter 6 – Allocations
- 1.4 It is our view that, to support a sound Local Plan, NUL should revisit its evidence base in relation to the requirement for student accommodation, based on the MIQs posed by the Inspector at Matter 5, including:

¹ Site Reference in the Evidence Base, including Site Selection Report and Assessments (Document ED029), SHLAA (Document ED006a) and Sustainability Appraisal (Document CD04)

1. Through dialogue with Keele University, fully establish and evidence the student growth / accommodation needs of the University throughout the Plan Period, and ensure that this requirement is factored into overall housing needs.
2. To counterbalance the current supply-reliance on student accommodation in Keele Village (and University Hub), ensure that sufficient sites that will deliver market and affordable homes are allocated in the settlement; to support the growth of the University, the development of the Science Innovation Park and overall population growth of the Borough.
3. Consider allocating deliverable sites in Keele Village (and University Hub), such as Site KL21, which has been demonstrated to be deliverable and available to support the University corridor and future its housing requirements.

2 HOUSING SUPPLY

Q5.6: What assumptions have been made in relation to the provision and delivery of student housing? Are these consistent with national policy?

- 2.1 National planning policy and guidance make it clear that when establishing the number of homes needed, that the needs of different groups, including students, should be taken into account in plan making. Paragraph 63 of the NPPF2024 states that:

*“Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing with-care and care homes); **students**; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes”.*

- 2.2 National Planning Practice Guidance (“NPPG”) goes further in providing advice on how Authorities should plan for student accommodation, stating that:

*“Strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Strategic policy-making authorities are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside university-provided accommodation. **Local Planning Authorities will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements in their area**²”.*

- 2.3 As set out in the Council’s 2023 Housing and Economic Needs Assessment³ (“HENA”) and 2024 HENA Update⁴, it is made explicitly clear that the proposed growth of the University has not been taken into account in the calculation of the Borough’s Housing

² National Planning Practice Guidance, Paragraph: 004 Reference ID: 67-004-20190722

³ Document Reference ED001a

⁴ Document Reference ED001

requirement, nor has effective engagement with the University on its future requirements been undertaken.

- 2.4 The 2023 HENA states that the number of students at Keele University had remained relatively steady, at circa 10-11,000 students, but had grown to some 12,235 students enrolled for the 2021/22 academic year, some 13% more than the figure three years earlier.
- 2.5 Moreover, the HENA notes that Keele University has developed a 2040 vision, that would enable its continued expansion via a number of capital projects, such as the £45m state-of-the-art sport and science facilities including new laboratories and teaching spaces on its campus, a £18m Smart Innovation Hub to house its management school and incubated companies and a £13m SMART Energy Network Demonstrator (SEND)⁵.
- 2.6 In the longer term, the Estates Strategy and Masterplan references the emerging 2040 Vision, and the Keele Deal initiative, in suggesting that the university plans to increase the number of students, to reach 16,000 by 2030 and 19,000 by 2040. This would increase the number of students by 31% and 55% respectively⁶.
- 2.7 Paragraph 8.34 of the 2023 HENA confirms that this context is not fully considered or understood in calculating NUL's housing requirement, stating that [Asteer **emphasis added**]:

*"As with the earlier modelling presented in the HNA, the demographic projections introduced in this report continue to principally allow for indigenous growth amongst residents of traditional student age, meaning that **a significant growth in the student population could generate an additional need for housing that is not explicitly taken into account. The HNA recommended that the Council maintains a dialogue with Keele University to ensure that its plans for investment, and specifically the anticipated allowance for additional student numbers in the plan period, are fully understood and the update above reaffirms why this will be necessary**".*

- 2.8 There is no evidence that engagement with the University has been undertaken or that student need has been addressed. A report undertaken by Lichfields, accompanying Persimmon's Regulation 19 Representations, anticipates that student demand will

⁵ HENA 2023 (ED001a), pp8.31-8.32

⁶ HENA 2023 (ED001a), pp8.31-8.32

generate a need for the equivalent of an additional 25 dwellings per annum in NUL, and specifically in the Keele corridor, which has not in any way been addressed.

2.9 Overall, Persimmon do not consider the approach to addressing the Borough's student accommodation need to be sound, nor reflect national policy. In summary:

1. There is no evidence that the proposed growth in student numbers at Keele University (which could increase by 6,756 students by the end of the Plan Period) has been considered as part of NUL's overall housing requirement.
2. There is no evidence of dialogue with the University has been undertaken, to demonstrate how the future student requirement has been robustly considered or justified.
3. The student accommodation supply in Keele Village (and University Hub) predominately comprises 406 units committed at Horwood Hall (a stated net increase of 974 student beds), 220 student accommodation units at Site KL13 and 260 student accommodation units at Site KL15. There is no evidence to demonstrate whether this will meet student demand (and a potential increase of 6,756 students during the Plan Period). If this does not satisfy demand, it could lead to a proliferation of HMOs which would place further strain on the demand for family and other housing in the University corridor and surrounding area.
4. Conversely, the proposed supply of housing in Keele Village (and University Hub) – which is predominantly student units (as set out above and in detail in our Matter 2 Hearing Statement) - will in no way satisfy the demand for market and affordable homes in the settlement; that will be needed support the growth of the University, the development of the Science Innovation Park and overall population growth of the Borough. Not planning to fully meet the demand for student accommodation will also place increasing demand pressure on traditional housing, caused by increasing student numbers.

2.10 Persimmon strongly feel that the approach to understanding Keele University's student requirement during the Plan Period is unsound, unjustified and contrary to national policy which requires strategic polices to consider the needs of different groups.

2.11 Persimmon consider that NUL should revisit its housing need evidence base to fully understand student demand, in partnership with the University, and ultimately diversify its

housing supply in Keele Village (and University Hub), and to provide a significant increase in the delivery of market and affordable housing during the Plan Period.