



Local Plan Examination: Response to Matter 5

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 5

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 5 Questions 5.1, 5.2, 5.3 and 5.7.

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 5.1

“Does the Plan provide an appropriate supply of deliverable and developable sites to meet identified needs and do these align with national policy?... Are the assumptions that have been made to inform the trajectory justified in relation to the delivery of housing sites...”

The Plan does not provide an appropriate supply of deliverable and developable sites to meet identified needs, and these do not align with national policy.

As set out in our client’s representations, namely WSP’s “Developer Representation: Housing and Economic Growth Evidence” (October 2024), the Council’s assumptions about delivery times and build-out rates appear flawed when compared with national benchmarks. The evidence indicates a potential shortage of 320 homes by 2040 and 1,181 homes by 2042.

The assumptions informing the Council’s housing trajectory are not robust or justified, particularly regarding:

- **Lead-in times and conditions discharge:** The Council has not provided transparent evidence to justify its assumptions. Compared to national benchmarks (e.g., Lichfields’ Start to Finish report), the projected lead-in times appear compressed and do not reflect the real-world complexities of the planning and approval process.
- **Site preparation and opening:** There is little detail on how the Council accounts for time needed to secure infrastructure, address contamination, or phase site delivery. This lack of consideration increases the risk of delayed starts.

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- **Build-out rates:** The assumed build-out rates are overly optimistic, especially given current market conditions and delivery trends. Without alignment to established national data, the rates are likely to inflate delivery projections and misrepresent the Borough’s actual housing capacity.

Response to Question 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?”

There is insufficient evidence to confirm that all 1,648 dwellings with permission as of March 2024 will be delivered within the relevant timeframe. The Council’s assumptions do not appear to account for lapse rates, stalled sites, or slow build-out, nor is there clarity on how constraints (e.g. infrastructure or viability issues) are factored in. This puts into question the realistic deliverability of the full number within the plan period. A revised housing pipeline that considered the realistic delivery rates is set out in our client’s representations, WSP’s “Developer Representation: Housing and Economic Growth Evidence” (October 2024).

Response to Question 5.3

“Is there a reasonable prospect that the total of 5195 new dwellings to be delivered through Local Plan allocations?”

There is significant uncertainty over whether 5,195 new dwellings from Local Plan allocations can be delivered. A large proportion of these sites are either:

- **Green Belt** (requiring complex policy change and lacking planning status), or
- **Dependent on optimistic delivery timelines and infrastructure provision** that is not yet secured.

This casts doubt on whether the trajectory is achievable, and undermines the credibility of the Council’s housing supply. The sites where housing delivery is in question are detailed in WSP’s “Developer Representation: Housing and Economic Growth Evidence” (October 2024).

Response to Question 5.7

“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?

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

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?”



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As per the above and our client’s representations, namely WSP’s “Developer Representation: Housing and Economic Growth Evidence” (October 2024), there is insufficient and unconvincing evidence that Newcastle-under-Lyme Borough Council will meet its housing requirement between 2020 and 2040, maintain a five-year housing land supply (5YHLS) on adoption, or sustain a developable land supply across the full plan period. This assessment reflects both the current evidence base and the implications of revised housing need figures emerging through the 2024 NPPF reforms. Key reasons are summarised below:

- **Meeting the Housing Requirement:** The Council’s proposed housing requirement of 8,000 dwellings (400 dpa) is not robustly justified and significantly understates housing need when compared to current evidence. Recent standard method figures, including 545 dpa (adopted December 2024) and 593 dpa (proposed July 2024), indicate that actual need is substantially higher. Even WSP’s midpoint assessment of 438 dpa reveals a clear shortfall. This underestimation, coupled with questionable assumptions about site capacity and delivery, creates a risk that the Borough will fail to meet its housing requirement over the 2020–2040 period.
- **5-Year Supply on Adoption:** The Council’s claimed five-year housing land supply (6.11 years) is overstated and relies on overly optimistic delivery assumptions. Once more realistic assumptions are applied, particularly by excluding or adjusting the contribution from Green Belt sites with limited planning progress, the supply falls to just 4.24 years. If measured against the adopted 545 dpa standard method figure, the 5YHLS further drops to 3.59 years. This clearly fails to meet the NPPF’s minimum 5-year requirement and signals a serious deliverability concern at the point of plan adoption.
- **Supply Throughout the Plan Period:** There is no convincing evidence that the Plan provides a consistent supply of specific, developable sites to support delivery throughout the full plan period. Delivery is heavily backloaded and reliant on sites with constraints or uncertainty. The projected shortfall of 1,181 dwellings by 2040, along with the risk of worsening under a higher housing target, reflects systemic issues in the housing trajectory and undermines confidence in the long-term effectiveness of the Local Plan.