

Hearing Statement – Matter 7

For The Strategic Land Group Ltd | 17-426

Newcastle Under Lyme Local Plan 2020-2040 examination



Project: 17-426
Hearing: Matter 7
Client: The Strategic Land Group Ltd
Date: 30 April 2025

This report has been prepared for the client by Emery Planning with all reasonable skill, care and diligence. No part of this document may be reproduced without the prior written approval of Emery Planning. Emery Planning Partnership Limited trading as Emery Planning.

Contents

1.	Introduction _____	1
2.	SLG response to the Inspectors' questions _____	2



1. Introduction

- 1.1 Emery Planning is instructed by The Strategic Land Group Ltd (hereafter referred to as “SLG”) to attend the examination of the Newcastle Under Lyme Local Plan 2020-2040. SLG is promoting draft allocation TK27: Land off Coppice Road, Kidsgrove.
- 1.2 This hearing statement sets out our response to the Inspector’s Matters, Issues and Questions in relation to Matter 7 – Housing Policies. It should be read in conjunction with our detailed representations to the Regulation 19 Pre-Submission Draft of the plan and our other Hearing Statements submitted to the examination.



2. SLG response to the Inspectors' questions

Issue 7 - Does the Plan set out positively prepared policies to meet affordable housing needs and the housing needs of other groups, which are justified, effective and consistent with national policy?

Q7.1 a) In Policy HOU1 are the (brownfield/greenfield) affordable housing requirements justified, and will the policy be effective in helping to maximise affordable housing and not undermining deliverability? The affordable housing requirements are based on the findings of the Local Plan Viability Assessment (ED004). Are the assumptions used within this soundly based? Why do the thresholds in policy HOU1 differ from those recommended in ED004? Should the policy include a threshold for older person homes and at what level should this be set?

- 2.1 The policy proposes that for major residential developments of greenfield sites, 30% of all units are to be affordable. The Local Plan Viability Assessment (ED004) indicates that this level of provision is not viable across the majority of sites in Value Area 1. We therefore propose that the policy is amended to reduce the affordable housing rate for greenfield sites in Value Area 1 to 20%. The policy would then reflect the evidence base, in particular Table 8.1 of ED004 which demonstrates that greenfield sites of 60-150 dwellings are at least marginal or viable based on 20% affordable housing.

d) The Policy will be assessed in relation to the most up to date version of the Framework which has higher affordable housing requirements for green belt sites. Is it appropriate that these changes be reflected in the Policy? If so, how?

- 2.2 Paragraphs 234 and 235 of the new Framework are clear that this plan is to be examined under the relevant provisions of the previous Framework. The Golden Rules therefore do not apply to the proposed allocations as the plan is being examined against the policies of the previous Framework.
- 2.3 But in any event, the plan is supported by a Viability Study (ED004) which clearly demonstrates that 50% affordable housing is not viable across the plan area. Paragraph 67 of the Framework is clear that less than 50% affordable housing is acceptable if a higher proportion would make the development of sites unviable. As we have set out above, the plan currently proposes an affordable housing requirement which is not viable based on the current evidence.



Q7.3 a) Are the requirements of HOU3 relating to the provision of homes that comply with M4(2) of the building regulations and the Nationally Described Space Standards (NDSS) justified by evidence relating to need and viability?

- 2.4 SLG has no objection to the proposed requirements in relation to M4(2) dwellings and the NDSS. Our concern relates to the requirements in Policy HOU3 relating to M4(3) dwellings.
- 2.5 For major developments, Policy HOU3 seeks that 10% of market dwellings should meet the requirements of Building Regulations Part M4(3)(2)A wheelchair adaptable homes standard and 10% of affordable / social rented housing should meet the requirements of Part M4(3)B accessible homes. Whilst we recognise the need to provide for such housing, this is a very significant cost to development. The Local Plan Viability Assessment (ED004) applies the following costs as an extra-over policy cost in the appraisals:
- M4(3)(A) Adaptable: £10,500 per house applied to 10% of open market houses.
 - M4(3)(A) Adaptable: £8,000 per flat applied to 10% of open market flats.
 - M4(3)(B) Accessible: £23,000 per house applied to 10% of affordable houses.
 - M4(3)(B) Accessible: £8,000 per flat applied to 10% of affordable flats.
- 2.6 Given that ED004 identifies that the cumulative policy requirements (including affordable housing) are not viable in Value Area 1, we consider that the requirement to provide M4(3) housing should be removed in Value Area 1. However, if the affordable housing requirement in Value Area 1 is reduced as per our suggested amendment to Policy HOU1 (see above), then this amendment may not be necessary.

Word count: 535



emery

PLANNING

2-4 South Park Court, Hobson Street
Macclesfield, Cheshire, SK11 8BS

+44 (0)1625 433 881

Regus House, Herons Way
Chester Business Park, CH4 9QR

+44 (0)1244 732 447



[emeryplanning.com](https://www.emeryplanning.com)