



Local Plan Examination: Response to Matter 9

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 9

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 9 Questions 9.1, 9.3 and 9.8.

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 9.1

“How much employment land is allocated in the Plan? How have “local” and “strategic” employment needs been identified and quantified and how does the Plan seek to address these?”

The Local Plan does not distinguish between local and strategic employment needs, beyond noting that strategic employment sites “*will be allocated in the Plan to support a resilient supply of employment land and investment and growth*” (Policy PSD1). The needs have not been sufficiently identified and quantified as per our responses to Questions 9.3 and 9.8.

Response to Question 9.3

“In relation to strategic employment needs is the amount of land allocated for strategic employment needs justified and consistent with national policy?”

The draft Local Plan fails to plan for all types of employment growth. The Final Draft Local Plan proposes to allocate two strategic employment sites, which are aimed at different uses (AB2 seeks to support a sub-regional logistics focused employment development and KL15 seeks to support the expansion of the existing science park and create an innovation zone, linked to research and innovation of Keele University). The overall delivery for industrial and logistics sites is therefore very low and limited. Emerging industries' needs are underrepresented, without considering additional site for logistics or accommodating advanced manufacturing, digital infrastructure, and e-commerce may crowd out opportunities for high-value employment provision.



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Response to Question 9.8

“Taken together, does the Plan provide for an appropriate amount and range of employment sites to meet the needs of the Borough for the Plan period?”

The Plan does not provide for an appropriate amount and range of employment sites to meet the needs of the Borough for the Plan period.

As set out in WSP’s “Developer Representation: Housing and Economic Growth Evidence” (October 2024), our client considers NULBC underestimate the growing demand for logistics and warehousing land, which will likely lead to future shortages and missed economic opportunities. The Council’s employment land provision is imbalanced, relying on outdated forecasting and failing to reflect the increased spatial requirements of the B8 sector and other high-growth industries.

With sectors such as advanced manufacturing, e-commerce, telecommunications and digital infrastructure experiencing rapid growth and technological change, competition for available land will intensify. The Plan’s current allocations, totalling just 63 hectares, do not adequately account for the unique needs of these industries, many of which require highly specified, digitally enabled sites or strategic access to transport infrastructure. As a result, the Plan lacks the flexibility necessary to support a diversified and resilient economic base, increasing the risk of long-term constraints on sectoral growth and inward investment.

Moreover, the employment land strategy is inconsistent with national policy, including the NPPF’s expectations for local plans to proactively support economic growth, respond to emerging sectoral demands, and plan effectively for logistics and infrastructure-led development. Without appropriate land allocations that reflect both current and future market trends, the Borough risks being unable to compete regionally and nationally for high-value jobs and investment.

To address these shortfalls, NULBC must revisit its land use planning strategy, reassessing B-Class employment land needs using updated demand models, and allocating additional, well-located and diverse employment sites. Introducing flexible or mixed-use policy mechanisms would allow the Borough to respond dynamically to changes in the economic landscape, ensuring a supply of deliverable and developable employment land that meets the needs of both established industries and emerging economic drivers throughout the Plan period and beyond.