



Ashfield Local Plan

EIP Hearing Statement Addendum

Matter 2 – Meeting Ashfield’s Housing Needs

On behalf of Vistry Group

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Introduction

This Hearing Statement Addendum is submitted by ADAS Planning on behalf of Vistry Group and should be read in conjunction with the Written Representations submitted as part of the Regulation 19 Pre-Submission Draft in January 2024 and the Hearing Statement for Matter 2 which was submitted in October 2024.

With previous representations, Vistry Group outlined a number of concerns about the draft plan primarily raising concerns with the housing shortfall and proposing their Brand Lane site as an alternative site to help fill this undersupply.

INS01 confirmed that the plan will be considered under the September 2023 version of the National Planning Policy Framework (NPPF), as such this Hearing Statement Addendum utilises the same version of the NPPF.

The following Statement builds upon the concerns raised in the representations, responding to the Inspectors Matters Issues and Questions.

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Issue 1

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to meeting housing needs.

Relevant policies – S1, S7, H2, H2a, H3, H4, H5, H6, H7, H8

Questions

2.7.1 Would the proposed additional sites put forward by the Council provide sufficient capacity to address the housing shortfall over the plan period?

INS05 concerns the interim finding of the Inspectors which identified a shortfall during the examination of the Ashfield Local Plan of 882 homes to the year 2040. The concerns of the Inspectors *“centre upon the effectiveness and soundness of this strategy as the Council is currently unable to identify sufficient homes to meet the housing requirement in the submitted plan”*.

Despite questions into the Council’s housing strategy, and the suggestion in INS05 of an additional call for sites exercise, the Council chose not to heed this advice. This was confirmed to the Inspectors in ADC09 *‘Ashfield District Council’s response to INS05 Re Inspectors initial findings’*. Instead, the Council chose to propose additional housing allocations at Full Council on 17th February 2025 which would provide 828 homes.

Notwithstanding any scrutiny of these 13 additional allocations, a housing shortfall of 54 homes would remain. There is no doubt that the persistence of this shortfall will be noted by the Inspectors and that the Council’s position of not conducting an additional call for sites exercise when recommended will be challenged.

The consequence of the Council proceeding against the advice offered could jeopardise the adoption of the emerging plan and the Inspectors make it clear in INS05 that *"any extensions to the six-month pause should only be allowed at the Inspectors' discretion to deliver adopted local plans"*. Therefore, there is an element of risk associated with the approach taken by the Council in resolving the housing shortfall.

Paragraph 60 of the NPPF 2023 states that: *"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed"*. Despite significantly boosting the supply of homes being the objective, the Council has not achieved the minimum of providing the number of homes in line with the objectively assessed need.

The representor has also provided a Hearing Statement in relation to Matter 10 – Site Allocations in which a reasoned discounting of an undeliverable site said to accommodate up to 60 dwellings is presented, which cumulatively would result in an unresolved shortfall of at least 114 homes up to 2040. An assessment into the deliverability of the other 12 additional allocations has not been conducted, meaning that the true housing shortfall is likely to be between 54 and 114+ homes.

To rectify this persistent shortfall and prevent any further time being wasted in the examination process, the Council need to acknowledge that omission sites can help.

Our client's interest in the Local Plan examination process stems from the submission of an outline planning application for up to 149 dwellings (ref: V/2025/0027) at Stubbinghill Farm, Brand Lane, Stanton Hill which was validated by the Council on 20th January 2025. The application site was also submitted to the Council during the Call for Sites exercise that was conducted in conjunction with the development of the emerging plan.

The site was included in the Strategic Housing and Economic Land Availability Assessment (SHELAA) 2025 and provided with the reference identifier SA093. **Figure 1** depicts the extent of SA093 which is broadly identical to the application boundary of the submitted outline application on the site.



Figure 1 – Extract from Strategic Housing and Economic Land Availability Assessment (SHELAA) Interactive Map

Despite the application being validated in January 2025 and also being in the SHELAA, no reference was made to its suitability within the '*Ashfield Local Plan 2023 to 2040: Consultation on Additional Housing Site Allocations*' which was published in February 2025. There is no explanation provided in any of the submission documents as to why SA093 has not been considered by the Council for a potential allocation. This appears to be a significant and surprising omission given need clearly exists in the District.

Lack of engagement during the determination process of the outline planning application has subsequently resulted in a non-determination appeal being submitted on 20th October 2025 and deemed valid shortly afterwards. As appellant, the representor is currently engaging with the Council to agree a Statement of Common Ground and to resolve outstanding points raised by statutory consultees.

SA093 is a non-Green Belt site and is in a highly sustainable location, with access to a wide range of local services and facilities, including shops, schools, recreational facilities, golf course and open spaces – all of which can be accessed safely via public footpaths. Given that outline application ref: V/2025/0027 is for up to 149 homes at Brand Lane, the representor would welcome engagement from the Council to include this land as a housing site allocation. The representor believes that the Council has an opportunity to produce a sound plan if it are willing to fairly assess additional housing sites, as suggested by the Inspectors.



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