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By email only: [sub22@ribblevalley.gov.uk](mailto:sub22@ribblevalley.gov.uk)

Dear Sir or Madam,

Re: Housing and Economic Development – Development Plan Document: Schedule of Identified Changes

Gladman Developments Ltd (**hereafter referred to as “Gladman”**) specialise in the promotion of strategic land for residential development and associated community infrastructure. Gladman has considerable experience in the development industry, and understand the need for the planning system to provide local communities with the homes and jobs that are required to meet Central Government objectives.

This letter provides the response of Gladman to the proposed schedule of identified changes to the Housing and Economic Development Plan Document (HEDDPD). Gladman have been involved throughout the Local Plan preparation process having previously submitted representations and have raised a series of concerns regarding the housing policies of the HEDDPD and the need for further flexibility so that the Plan is reactive to situations of housing shortfall which may occur over the plan period.

Whilst noting that the proposed revisions seek to take account of recent changes, such as the most up-to-date information relating to housing delivery and the recent resolution to grant planning permission at West of Preston Road (subject to a signed s106), Gladman remain concerned that the Plan fails to provide a flexible and effective response to meeting the Council's **housing needs**. Through our response to the publication version of the Plan, we highlighted the need for a more effective response to development proposals which have not been identified for development to ensure that the vitality and viability of settlements is maintained across the plan period. Whilst major settlements continue to play a key role in the accommodation of future development within the authority, this should not be at the expense of ensuring that the housing and employment needs of other settlements are met. The continued reliance on principle settlements to accommodate future growth provides a narrowly focused site allocations document that will lead to the failure of delivering the development needs of Ribble Valley. Gladman suggest therefore that to produce a sound plan and meet the development needs of the Core Strategy and to ensure that a demonstrable supply of housing land is available, the Council should take a wider approach than is currently being proposed. Gladman reiterate our previous submission that the Council investigates the need to allocate additional sites in sustainable settlements and the need for a criteria based approach which ensures that in instances where the Council is under delivering or where development would lead to the delivery of sustainable development, then the Council will look favorably towards these development proposals. In this respect, Gladman refers to the main modifications to the Warwick Local Plan, within which Policy H1 part 1(d) states that ***“housing development will be permitted in the following circumstances:***

*d) In the open countryside where*

- i. The site is adjacent to the boundary of the urban area or a growth village, and*

- II. *There is an identified housing need to which the proposed development can contribute, and*
- III. *The proposal is for a small scale<sup>1</sup> development that will not have a negative impact on the character of the settlement and the capacity of infrastructure and services within the settlement, and*
- IV. *The proposal is within a reasonable safe walking distance of services (such as school and shop) or is within reasonable safe walking distance of a public transport interchange providing access by public transport to services, and*
- V. *The proposal will not adversely affect environmental assets (including areas of ecological value, areas of high landscape value and designated heritage assets) unless these can be suitably mitigated in line with other policies in the Plan.”*

Similar to the case in Scarborough previously referred to in our earlier representations, this is a further example of a more flexible approach to development within the open countryside and better aligns with the objectives of the Framework. Gladman recommends a similar policy approach is appropriate in Ribble Valley and is all the more prevalent following the publication of the Housing White Paper, to which the title makes apparent that the Government considers the housing market to be broken. Indeed, the foreword from the Secretary of State sets out that we need to build more homes right now and for many years to come to resolve the housing crisis. It is clear that not delivering identified housing needs is not an option moving forward and Gladman considers the Council should be taking a proactive approach to ensure housing needs are met now.

Yours faithfully,



Gladman Developments

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<sup>1</sup> In the case of Warwick, small scale was classed as less than 50 dwellings