

**THE STOCKS RESIDENTS ASSOCIATION**  
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cc. Members of the Planning Committee of Bolton Council

12 June 2018

**Planning Application 02434/17**  
**300 Dwellings, Land off Victoria Road, Horwich, BL6 5PH**

Dear Ms Williams,

This is a further submission from the Stocks Residents Association (the 'SRA') in objection to Planning Application 02434/17 – 300 Dwellings, Land off Victoria Road, Horwich, BL6 5PH (the 'Site') (the 'Application') as submitted by Emery Planning on behalf of Peel Investments (North) Ltd ('Peel').

This submission is supplementary to, and should be read in conjunction with, the letters of objection submitted by the SRA on 22 January 2018, 13 February 2018 and 9 April 2018 (together the 'SRA Objections').

The SRA has considered it necessary to make this further submission in light of recent developments which have raised concern and doubt in relation to the process surrounding the Application and whether key issues which have previously been raised by the SRA have been considered and/or addressed. These concerns are set out below in more detail.

As we have previously stated in the SRA Objections, the Application was, and remains, contrary to the wishes of the people of Horwich and represents the 'final straw' in terms of the over development of the town which is confirmed by the many hundreds of personal objections to the Application.

The SRA therefore implores Bolton Council and its officers to withstand the considerable pressure being applied by Peel to force through a development which is contrary to the Local Plan and to reject the Application in order to uphold the wishes of the people of Horwich.

The members of the Planning Committee and the political parties they represent, should not underestimate the long term consequences of the Application being approved as it will represent a further high-profile failure of Bolton Council to uphold the will of local population in favour of property developers. Such an outcome will further undermine the limited trust and confidence that the people of Horwich have in Bolton Council and its senior officers.

The Council, and in particular the members of the Planning Committee, have the opportunity and ability to restore that trust and confidence by withstanding the pressure from Peel and reject the Application to uphold the will of the people of Horwich.

In addition, the SRA considers that any decision to approve the Application on the basis that there is a 'presumption' to do so under Paragraph 14 of the National Planning Policy Framework due to a shortage in the five year housing supply in Bolton, would be a misinterpretation of the Framework as the Site is not in itself 'deliverable' within the next five years and thus provides no immediate benefit to alleviate the housing shortfall. Indeed, Bolton Council would not be permitted to include the proposed 300 houses in its own projected housing figures and a decision to approve the Application on such basis would be unlawful and subject to challenge by way of judicial review.

We now turn to consider the key issues which have made it necessary for the SRA to write this further objection.

## **A. Traffic Issues**

The SRA notes the '*u-turn*' that has taken place with regard to the analysis of the traffic data with the Local Highways Authority ('LHA') firstly recommending rejection of the Application on traffic grounds in its report of 14 May 2018. This conclusion was challenged by Peel's traffic consultants which led to the LHA changing its mind and reaching an opposite conclusion in its report of 6 June 2018 whereby it is now recommending approval of the Application. The SRA however considers the LHA's position to be mistaken due to a number of material issues which have not been taken into account which are set out below.

### *Failure to take into account daily variation in traffic levels*

The LHA had previously recommended refusal of the Application on the grounds that the impact of a signalised junction at the A673 / Victoria Road junction would be detrimental to traffic flow on the Key Route Network and without a highway solution at this junction, the development traffic would have detrimental impact on the operation of Victoria Road. In light of the revised growth factors associated with the Rivington Chase development the concerns of the LHA has apparently been removed.

The SRA notes from the LHA Report of 6 June 2018 that Peel's transport consultants, TTHC, by their own admission, presented incorrect figures in its original report and had allegedly "*over-estimated the future Baseline development flows*" as they had not made an allowance for the removal of trip generation from existing use classes currently operating on the Loco Works site. This 'over-estimation' was not identified by the LHA (which is also of concern as to the level of attention and resource it has applied to the Application) but once identified has apparently satisfied the LHA that the increase in traffic caused by the proposed development would not lead to the A673 / Victoria Road junction operating beyond capacity and hence there is no longer a requirement for a signalised junction which had been central to the Application from the outset.

It is however noted that Victoria Road is still predicted to be over operational capacity in 2025 at 0.852 reserve flow capacity, therefore over the 0.85 level which indicates the junction is about to break. Given the importance of this junction and its proximity to two primary schools, it is simply not appropriate to allow a scheme to progress with no mitigation when the junction exceeds the 0.85 threshold.

Importance must be placed on the potential for daily variation in traffic levels. These can be significant and it is clear that neither TTHC nor the LHA has taken this into account. Indeed the Transport Research Laboratory produced a paper on seasonal variation in traffic flows. It is more than reasonable to conclude that base traffic flows at this junction could have a variation +15%. As a

consequence this would send the results of the Victoria Road arm well over the theoretical capacity of the junction, thereby creating a very real operational and highway safety risk.

This point underlines the small margins involved and it is thus of great surprise to the SRA how the LHA reached its conclusion particularly given the increased accident risk for children as the junction is outside two primary schools (St Mary's and Chorley New Road). Given the increased risk of accidents involving children, the only reasonable and proper course of action where there is any doubt whatsoever as to the theoretical future capacity of the junction, would be for the LHA to exercise extreme caution and at the very least require a sensitivity test to be presented to understand such implications or maintain its original position that a signalised junction is required.

Indeed, it is of considerable concern that despite Transport for Greater Manchester stating in its report of 29 January 2018 that given the close proximity of two primary schools "*BMBC may wish to suggest a safety audit is carried out prior to approval of the scheme*" (see Page 3), there is no reference to any such safety audit in the LHA's report nor any requirement for Peel to carry one out.

In the circumstances, the LHA should consider the long term implications of proceeding with its current position without a safety audit and the consequences of such a decision for Bolton Council in the event that there is even one more accident than there would have otherwise been without a signalised junction being in place.

#### *Unreliable data*

The multiple conflicting and apparently erroneous interpretations of the traffic data also leaves the SRA with no confidence whatsoever in the process that has led to the LHA's conclusion that no signalised junction is required at the A673 / Victoria Road junction.

Indeed, the SRA questions the data which is being relied upon (in particular the 2025 Baseline figure) as self-evidently, it does not reflect the reality on the ground.

To take one example, the LHA Report of 6 June states:

*"The corrected and updated 2025 Base flow for the A673 / Victoria Road junction forecast that the existing junction would operate within capacity with growth, with a Ratio Flow to Capacity (RFC) of 0.687 and a queue of **2 Passenger Car Units (PCU) in the AM peak on the Victoria Road arm and a RFC of 0.394 and a queue of 1 PCU in the PM Peak**. Likewise the Chorley New Road East and West arms will operate at RFC of 0.422 and 0.438 with a queue of 1 PCU and 1 PCU in the AM Peak respectively and RFC of 0.556 and 0.314 with a queue of 1 PCU and 1PCU in the PM Peak respectively. This clearly forecasts that the junction will operate well within capacity within 2025 Future Year Forecast with the correct growth applied."* (emphasis added)

The members of SRA know only full well from their daily travelling experiences that the queues at the A673 / Victoria Road junction during peak times are more than as stated in the 2025 Base flow figures referenced in the above extract from the LHA Report and there can regularly be queues extending back from the junction up to St. Mary's School and towards the entrance to the College development.

The current actual volume of traffic using the junction is thus considerably greater than is reflected in the 2025 Base flow figures and thus the conclusions of both TTHC and the LHA are fundamentally flawed and cannot be relied upon to determine the Application. The SRA therefore considers that any decision to recommend approval of the Application upon such conclusions would be unlawful.

*No consideration of the combined health care centre on the 2025 Baseline figures*

No account appears to have been taken of Horwich's proposed new health centre development in the traffic assessments. This important new centre for health service provision will not only bring existing GP services from Horwich together but is likely to include the provision of further services including scanning and diagnostic services. This results from the attempt within health services design and delivery methodology to move a range of medical services out of the acute sector into primary care. The centre, which is intended for completion in the next five years, will therefore focus existing traffic on the Victoria Road area of Horwich, but it will also lead to increased traffic as patients and medical staff attend the centre from the rest of the west of Bolton.

It is obvious that a health care centre of such a size will have a significant impact on the volume of traffic using Victoria Road before 2025 and yet, there is no reference to such additional traffic in the data upon which the Application is being considered. Despite being invited to add any further developments into the background figures by Transport for Greater Manchester in its report of 29 January 2018 (see Page 3), the Planning Department has simply failed to take the new medical centre into account. This alone could have a significant and determinative impact on the conclusions reached by the LHA.

*No account for the increase in capacity of Chorley New Road Primary School*

It is also noted that there is no reference to the increase in the capacity of Chorley New Road Primary School having been taken into account in the 2025 Baseline figures despite Bolton Council being invited by Transport for Greater Manchester to include any further developments into the background figures.

It is noted that the school's intake is in the process of changing to a two form entry from its current a one and a half form entry. This will add approximately an additional 15 places per academic year so approximately 90 additional students in total and thus 'theoretically' an additional 90 vehicles in the area during the am and pm peak times. This is a material change which means that the 2025 Baseline figures currently being relied upon by the LHA to recommend approval of the Application are flawed and cannot be relied upon.

*No impact assessment on other junctions*

Furthermore, as set out in the SRA's Letter of 9 April 2018, there have been no traffic impact assessments whatsoever carried out in respect of Bond Close, Mayfair / The Strand and Stocks Park Drive generally and/or Stocks Park Drive's junctions with Victoria Road and Chorley Old Road which are already over capacity during peak times (in part due to the presence of a private nursery on the site of a former residential property at the Stocks Park Drive / Chorley Old Road junction which does not have car parking facilities and thus has led to on-street parking in sight lines at the junction mouth).

There has also been no impact assessment whatsoever on the B6226 Church Street / Victoria junction despite the AECOM Report (05/02/2018) stating as a formal 'Recommendation' that:

*"Recommendation: the TA should assess the B6226 Church Street / Victoria junction in all scenarios including a sensitivity test which takes account of an increase in traffic at the junction as a result of increases in delays at the southern section of Victoria Road."* (see Paragraph 7.1.2.2 of AECOM's Report).

In its response note of 27 February 2018, Peel's traffic consultants, TTHC, confidently stated as follows:

*"AECOM have then requested a sensitivity test of the B6226 Church Street/Victoria Road mini roundabout on the basis that they suggest traffic heading via Victoria Road to/from the south-east would divert through the Site via Bond Close or Mayfair. The new signalised junction would result in a reliable journey time to/from Chorley New Road, so the majority of traffic would use this route. However, any traffic heading to and from the north east direction would route east/north on Stocks Park Drive, avoiding the mini roundabout. The requested sensitivity test is therefore not necessary."*  
(See Paragraph 19 on Page 3 & 4 of TTHC's Response Note)

Not only has the sensitivity test recommended by AECOM not been undertaken and simply ignored by TTHC, the position adopted by TTHC that it was unnecessary due to the existence of a new signalised junction at the Chorley New Road / Victoria Road junction, is no longer justifiable given that based upon the latest LHA report, a signalised junction would not now be implemented. The effect of this change would be traffic being re-routed and using alternative side streets to avoid queuing at the A673 / Victoria Road junction including traveling to the opposite end of Victoria Road in order to travel along Church Street to Chorley Old Road. In the circumstances, it is now of even greater importance that a traffic impact assessment be carried out at the B6226/Victoria Road mini roundabout as recommended by AECOM.

Given the significance of the traffic impact of the proposed development, the fact the Planning Department has not even insisted that Peel undertake such further testing despite the clear recommendation in AECOM's report to do so, is of major concern and represents a failure on its part to properly test the Application.

It is therefore submitted that given there would no longer be a signalised junction at the Chorley New Road end of Victoria Road, any decision to recommend approval of the Application without any testing whatsoever of the B6226/Victoria Road mini roundabout as well as the junctions of Stocks Park at Victoria Road and Chorley Old Road would be unlawful. This testing should also take into account the projected traffic flows to be generated by the proposed combined medical centre. The determination of the Application must therefore be postponed to enable such testing to take place.

#### *Summary on traffic issues*

Given the numerous issues above, it is clear that the data upon which the LHA has based its recommendation is unreliable and needs to be reviewed. If the Planning Department makes a recommendation to approve the Application based on the LHA's conclusion then the SRA would have serious concerns over the lawfulness of such a recommendation.

Indeed, in the current climate the SRA anticipated that Bolton Council would put the health and safety of its residents (and in particular its children) ahead of the interests of a private property developer whose sole aim and objective is the generation of profit for its shareholders and who evidently has no regard for the safety of children attending the two primary schools in close proximity to the Site. If the Application is recommended for approval in such circumstances, rest assured that the local residents will hold Bolton Council liable for such negligent decision taking in the event of any increase in accidents in the vicinity of the Site and this letter shall act as permanent record of the advance warning provided to the Council of these risks.

## B. Detrimental Impact on the Landscape

The SRA notes the report dated 22 May 2018 from Sue Rigby, Landscape Regeneration Manager, Landscape Development & Design (the 'Landscape Report'). Whilst the SRA welcomes the Landscape Report and its conclusions, the SRA was surprised to see this report being produced so late in the process given that it focuses upon issues that were raised by the SRA in its first submission on 22 January 2018 (i.e. some four months later). The SRA finds it surprising that the Planning Department only sought to procure such a report well after the consultation process would have actually closed if the original timescale for a decision had been met.

The SRA does however welcome the Landscape Report and considers that it provides a further basis upon which the Planning Department must recommend the refusal of the Application. In particular, reference is made to the following points arising from the Landscape Report which describe the unique and historic nature of part of the development site:

- *"...the fields on the upper part of the proposed development site which are not part of the golf course possess far more naturalistic and vernacular landscape character; following the natural flowing contours of the land they are the remnants of the upland livestock farming landscape that would have been typical along the valley in the past decades, and would have pre-dated the industrial growth of Horwich-but that now is being increasingly lost or degraded by built development and landscape change as a result agricultural change."*
- *"Small to medium sized grazing fields enclosed by dry stone walls, that would have been typical along this valley, and which provide the visually pleasing setting for the South-Western edge of the Wallsuches Conversation Area, in particular the vernacular stone buildings informally clustered at Knowles Farm and at the top of Fleet Street. The experience of walking along the top end of Fleet Street in the environs of Knowles Farm is delightful; there is a real sense of historic Horwich from the Georgain (sic) period still living on here, when it was predominantly still a rural, farming economy in this location with narrow lanes, woodland blocks, plenty of wildflowers, an abundance of birdsong and open countryside."*
- *"If the housing development were to encroach into the fields closest to Knowles Farm this would impact on the setting of the Conservation Area and further add to the loss of the rural vernacular farming landscape. If however the housing were only to extend over the present footprint of the golf course proper, the negative impact on views out from the Conservation Area South-West from the dwellings around Knowles Farm, and to the setting of the Conservation Area would be very much reduced-as would the impact on views from residential properties in the vicinity of Mayfair, Belgrave Crescent, Kensington Drive et al, looking South currently across an open field to woodland, and from those around Buckingham Avenue looking North-West towards the Conservation Area, currently across open fields."*

The Landscape Report thus supports fully the submissions which the SRA has made from the outset in respect of the aesthetic and historic nature of the fields adjoining the golf course and the loss that will be suffered if the Application is to be approved. It must also be reiterated that not only does the land have aesthetic and historic value it is the habitat for a wide variety of species of wildlife such as deer, foxes and bats which will be lost forever if the Application is approved.

It is clear that Peel places no value on the damage that the development would have on the landscape which, according to the Landscape Report, is one of the last few examples of 'old' Horwich – the SRA

fully expects however, that the members of the Planning Committee will value the preservation of landscape and reject the Application in order to be acting consistently with the Local Plan including Policy CG1, Policy CG6AP, Policy OA1 all of which enshrine the protection of Protected Open Land.

Furthermore, if the presumption in favour of development is deemed to apply in this case under Paragraph 14 of the National Planning Policy Framework due to the Local Plan being out of date (in respect of which see further below), it is recalled that there is a presumption that ‘decision-takers’ should grant permission unless “...*any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole...or specific policies in this Framework indicate development should be restricted.*” It submitted that in accordance with Landscape Report, the detrimental impact on the landscape adjacent to the golf course would significantly and demonstrably outweigh the benefits of the development. This constitutes a material factor which in itself, provides a basis upon which the Application must be rejected.

In addition, the contents of the Landscape Report supports the previous submissions made by the SRA dated 13 February 2018 that the permission should not apply as the Application conflicts with the following core principles of the National Planning Policy Framework:

- The fifth core planning principle which provides that planning must “...*take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;*”
- The seventh core planning principle provides that planning must “...*contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;*” and
- The tenth core planning principle provides that planning must “...*conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;*”.

The Planning Committee is also requested to consider the effect of granting approval to the Application on the land which adjoins the development site to the rear of Windsor Drive and bordering New Chapel Lane which shares similar historic qualities to the field forming part of the Application including Nellie’s Clough. Other developers will see an approval in this case as a ‘green light’ for them to apply to build on adjoining land and it will be difficult, if not impossible, for the Council to refuse any such subsequent applications based on the decision in this case. There can be no doubt therefore based upon the Landscape Report alone, that to approve the Application would be unlawful as to

grant approval would lead to a material and irreversible impact on landscape which has heritage value and borders a Conversation Area.

### **C. The National Planning Policy Framework (the 'Framework')**

As set out in the previous SRA submissions, the Application conflicts in material respects with most of the core Planning Policy Principles. It is queried however whether the points which have been raised by the SRA in this respect have been considered by the Planning Department?

In particular, the SRA notes from the publically available documents and correspondence that the Planning Department may not have considered and/or addressed the issues previously raised by the SRA regarding the Framework and the question of the shortfall in the five year housing supply in Bolton. As the Planning Department is aware, the so-called 'tilted balance' and the presumption in favour of granting permission only applies where there the Local Plan is considered to be out of date due to a shortfall in housing supply.

Whilst it appears that the Local Plan may be considered to be 'out of date' due to the failure of Bolton Council to ensure an adequate five year supply of housing, this does not mean that any application then simply gets 'waved through'. First and foremost, the Local Plan does remain relevant – it is simply has less weight attached to it in the 'titled balancing' exercise and so the above-mentioned Council policies to refuse permission on Protected Open Land remain relevant and valid.

A vitally important feature in the balancing exercise which does not appear to have been addressed is the fundamental flaw in the Application that it does not provide any short term benefit as it does not contribute to alleviating the shortfall in the five year housing supply. As set out in our previous submissions, as the golf course is subject to a lease which cannot be determined until 31 January 2023, there can be no 'spades in the ground' until such date and thus no prospect of any houses actually being built for some time after such date. Indeed, the SRA understands that Horwich Golf Course is still actively encouraging and accepting new members to join the club and will do so for a number of years.

This underlines why the Application is entirely opportunistic in nature as there is no immediate intention for the development to take place in the short term but simply to secure outline permission during a window of opportunity whilst there is a shortfall in the five year housing supply. Peel knows full well that this window of opportunity will close once the Loco Works (Rivington Chase) development is built out. Granting outline approval simply gives Peel a 'blank cheque' to cash in when it comes to sell the Site to other developers in due course when the golf course lease expires.

This point is of material significance as the Site cannot be considered 'deliverable' in accordance with the Framework:

*"11 To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans." (Footnote 11 to Paragraph 47)*



As the Site cannot be delivered in the next five years, it does not satisfy the test set in the Framework to be considered as being 'deliverable' and thus should not be given any weight in the 'tilted balancing' exercise as it provides no benefit to assist the local housing shortfall and Bolton Council would not be permitted to include the proposed 300 houses in its own projected housing figures. This underlines why it stands to reason why the presumption is not intended to apply in respect of sites which are not themselves 'deliverable'.

The importance of housing delivery has also been highlighted in the Consultation Paper relating to the proposals for the revised National Policy Framework. A key feature of the new National Policy Framework is for sites to be approved which can lead to a quick delivery of houses and to avoid 'land banking' by developers. As previously noted, Paragraph 78 of the draft Framework which provides that authorities should consider imposing a planning condition to bring forward development within two years. If such a condition was to be imposed on the Application, then Peel would simply be unable to satisfy it.

The Application is thus distinguishable from the three recent appeal decisions of the Planning Inspectorate which overturned the decisions of Bolton Council to refuse permission for development on sites which conflicted with the Local Plan. In those cases, the sites were deemed to be deliverable in order to benefit of the five year supply of houses. As noted, the Site in this case is not 'deliverable' in the next five years.

In such circumstances, the SRA maintains its argument that 'the presumption' under Paragraph 14 of the Framework should not apply and the Local Plan should prevail. This provides a clear legal basis and in fact, a requirement, for the Planning Committee to reject the Application.

**The SRA considers that any decision by the Planning Department to recommend approval of the Application based on the presumption under Paragraph 14 of the Framework and any subsequent approval of the Application by the Planning Committee based upon such recommendation, would be a misinterpretation of the Framework and thus be unlawful and subject to challenge by way of judicial review.**

#### **D. Section 106 Contributions**

The SRA also wishes to re-iterate the point for the benefit of any new members of the Planning Committee that it highly likely that the promised 'Section 106' contributions which accompany the Application will simply not materialise. The 'commitment' to deliver 35% of the Site by way of affordable housing will inevitably be diluted and so will the financial contributions as Peel, once it has secured outline permission, sells the Site to other developer(s) who will look to re-negotiate these liabilities on the basis that they are no longer economically viable. The SRA's members have professional industry experience and know full well how the 'game' works and it would be naïve for the Planning Department to contend otherwise.

The SRA therefore requests the Planning Department to inform members of the Planning Committee that the financial contributions which have been promised by Peel, are not in fact guaranteed and thus they should not be counting on such contributions finding their way to support infrastructure projects in their own wards across Bolton.

## E. Conclusion

As will be noted, the SRA has identified certain fundamental areas which have not been considered and/or addressed that require further consideration before the Application can be determined. These include the uncertainty and deficiencies in the traffic impact assessments, the impact of the Landscape Report and the fact the site is not 'deliverable' within the next five years and so the presumption in favour of development under the Framework should not apply.

Furthermore, it is again reiterated that the Planning Department has a duty when considering applications which fall outside of the Local Plan, to consider the cumulative harmful effect of the Application in the context of other developments in the local area and not just the Application in abstract. In this regard, the Application needs to be considered in the context of the 2,000 houses which already have permission to be built less than one mile from the Site and the cumulative material impact such developments will have on local infrastructure and resources in Horwich.

It is again emphasised that where the presumption in favour of development is deemed to apply, it applies in respect of '*sustainable development*' only and not '*any development*'. In order to achieve '*sustainable development*', it is necessary for development to result in '*net gains*' from economic, social and environmental perspectives. The Application would deliver '*net losses*' from all of these perspectives and thus would not constitute '*sustainable development*'.

The development foreseen in the Application is the wrong development in the wrong place at the wrong time. This is not just the view of the SRA but it is the view of the people of Horwich generally as evidenced by the hundreds of personal objections which have been submitted. The wider concern is that a decision to approve the Application will set a dangerous precedent for further unrestricted development across Bolton generally as developers will see a clear route for obtaining approval from Bolton Council in places where there are clear and material reasons to refuse permission.

Individually and collectively, the points set out in this letter of objection mean that the Application must be rejected. The SRA also expects the Planning Department to respond to this letter and confirm that the issues raised are being considered and/or addressed.

In the event these issues are not considered and/or addressed and the Planning Department proceeds to recommend approval of the Application, the SRA would consider such a course of action as unlawful and subject to legal challenge. The SRA must thus entirely reserve its position in respect of any steps and action that it may feel compelled to take in the event it considers Bolton Council to have acted unlawfully in relation to the consideration and any approval of the Application.

Finally, given the concerns held by the SRA with regard to the Planning Department's seemingly passive approach to the Application and failure to address material issues, the SRA has taken the opportunity to write to the following individuals to make them aware of the issues and concerns held: Simon Gallagher (Planning Inspectorate (MHCLG Representative)), Ben Linscott (Director of Inspectors, Planning Inspectorate), Rt Hon. James Brokenshire MP (Ministry of Housing, Communities & Local Government), Dominic Raab MP (Minister of State for Housing), Melanie Dawes CB (Permanent Secretary, Ministry of Housing, Communities & Local Government), Chris Green MP,

Karen Sykes (Director of Investigation, The Local Government and Social Care Ombudsman), Andy Burnham (Mayor of Greater Manchester).

Yours faithfully

**Malcolm Harrison**  
Chairperson