Fallowfield & Withington
Community Guardians
Planning application 129020/FS/2020

February 4th 2021

Dear Ms Roscoe

I write on behalf of Fallowfield & Withington Community Guardians to request that you refuse planning permission for application 129020/FS/2020 on the Oakley House site in Fallowfield. The planning application seeks to create purpose built student accommodation (PBSA) for 425 University students. This will be a large new development in Fallowfield and is **counter to policy H6 of the Core Strategy** for which all new developments in District Centres should be mixed use.

Community Guardians in our group are mostly long term residents who have been part of the group since we started meeting 15 years ago. We know the area well and we have worked with councillors, council officers, police and University officers to try and address the problems of over intensification of students in our area.

This objection will focus on:

1. The harm to the community

a) Students make up 64% of the population of Fallowfield in M14 (sub postcodes 6 & 7)
b) Existing problems of anti social behaviour in student accommodation on campus
c) Impact on the general residential community of proposed additional 425 bed spaces
d) Harm to residents in the vicinity of the Oakley House Site
e) More Purpose Built Student Accommodation (PBSA) will not free up family homes
f) Existing environmental problems: Evidence to support the impact on the community

2. The harm to the environment and users of Platt Fields (particularly young children)

a) Park users
b) Trees & wildlife
c) Air pollution
d) Light pollution

3. The harm to the setting of the Villa

4. The current pandemic and the future of HE

5. Conclusion

1. The Harm to the Residential Community

Oakley House is a Victorian building which has been a feature of Fallowfield since it was built in c1837. In recent decades it has been used as offices for USDAW and has been a site of peace and quiet with pleasant gardens, an oasis of calm. Opposite lies the recently expanded Owen's Park Campus which has accommodation for more than 3000 students.

a) Students make up 64% of the population of Fallowfield in M14 (sub postcodes 6 & 7)
Contrary to Policy SP1 to create Sustainable Neighbourhoods of Choice

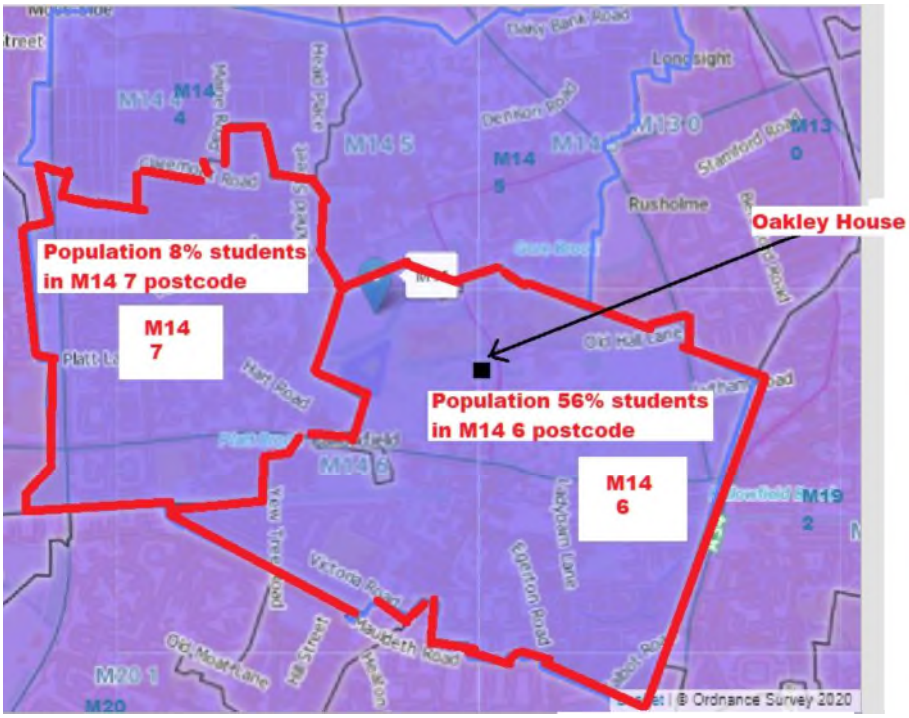
Student numbers are excessively high in Fallowfield. Not only has the Owen's Park campus been increased by 1 122 bed spaces during the current refurbishment of the campus, many other PBSA flats have been built including Mayfair Court & Chancellor's Court (Mezzino) and Mansion Point (Mansion Student). There are thousands more students living in south Manchester in residential flats and HMOs with very high numbers concentrated in the M14 6 & M14 7 sub postcodes which are the closest areas to the proposed site for development. Students reside in Fallowfield from a number of Universities including UoM, MMU, University of Salford and other new pop-up Universities such as BIMM.

Fallowfield has a party reputation and halls of residence on the Fallowfield campus are very popular for new students. An additional 425 extra beds opposite Owen's Park may well help UoM to find accommodation that is highly sought after by those coming to experience the Fallowfield scene. However, Figure 1 shows that **56% of the population in the M14 6 postcode area are students** and **a further 8% in M14 7 postcode area**. This demography is highly unbalanced and it is no wonder that Fallowfield has a very long history of student related anti-social behaviour. Many students see Fallowfield as one large campus and it is because they dominate the population so much, that is what they largely see. Permanent residents are outnumbered and invisible to them.

Figure 1: Percentages of students in M14 sub postcodes of Fallowfield

Postcode Area	Area km^2	Number of student residents 2018/19 per postcode area https://wonkhe.com/blogs/the-start-of-term-is-not-just-a-problem-for-universities/	Population (2011 census) https://www.nomisweb.co.uk/census/2011/postcode_headcounts_and_hou
M14 6 East Fallowfield, North Withington	2.37	11 195	19 876
M14 7 West Fallowfield	1.52	990	13 104
Total for M14 6 & M14 7	**3.89**	**12 185**	**32 980**

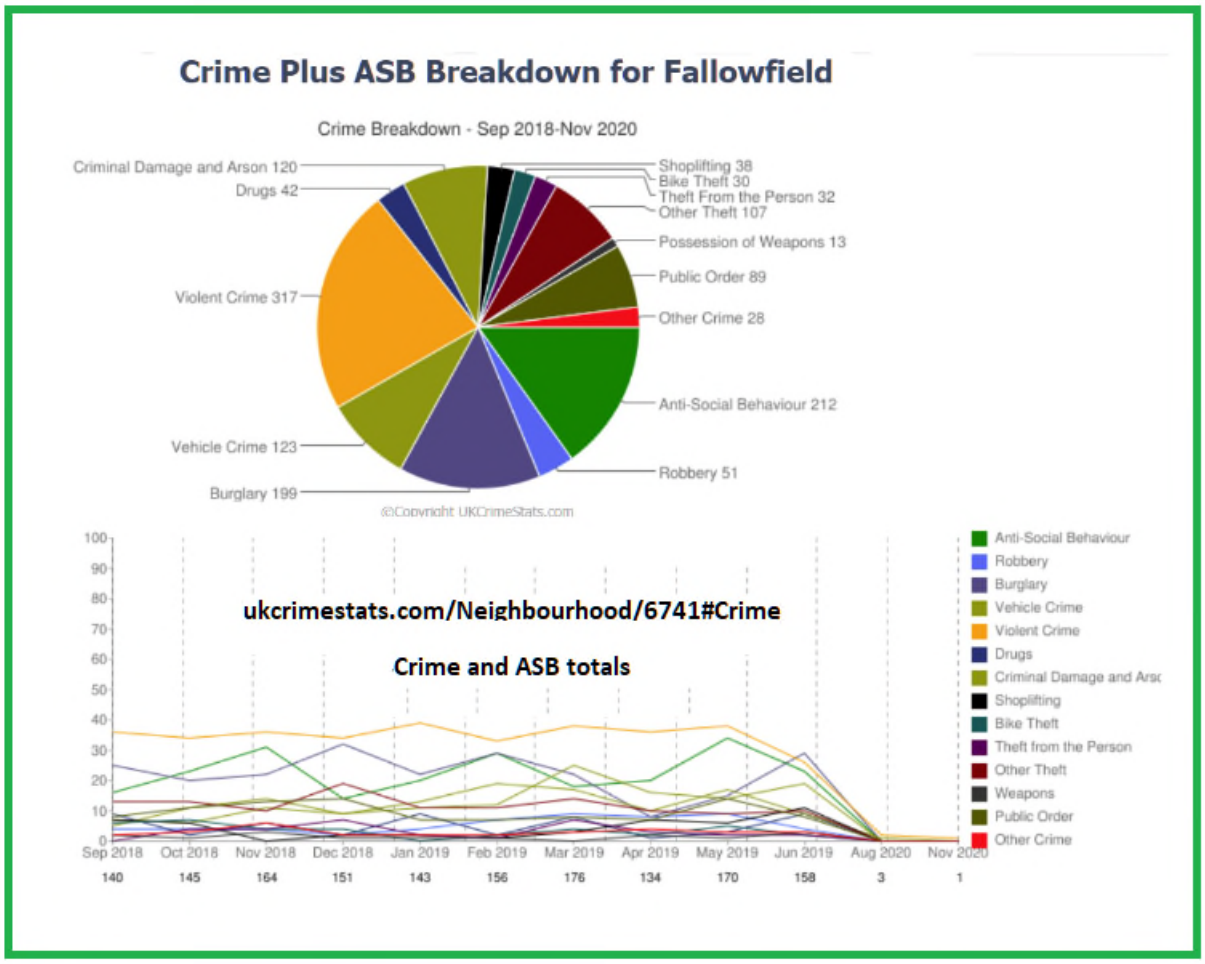
Figure 2: Map showing percentages of students in M14 sub postcodes of Fallowfield



Policy SP1 of the Core Strategy states that development in all parts of the city should **make a positive contribution to the heath, safety and well-being of the residents.**

Antisocial behaviour (ASB) levels are very high in this area of concentrated student numbers. The high density of students is known to attract burglars and other predators. ASB and crime figures are shown in Figure 3 for the Fallowfield area. Crime figures obtained from the Crime Impact Statement highlight very high levels of burglary around this site and are shown in Figure 4.

Figure 3: Pie chart of crime in Fallowfield showing high levels of violent crime, burglary and ASB



Fig

	Bicycle Theft
	41

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ure 4: Crime Statistics

Fallowfield July 1st 2018- 30th June 2019 from Crime Impact Statement
Figure 3 shows that ASB peaks coincide with student arrivals (late Sept/ October) and end of exams (Jan/Feb & May). These times are notoriously bad for residents and often lead to loss of sleep on every night of the week. The addition of a further 425 students to the population will not make a positive contribution to the health, safety and well-being of the residential population. It will encourage more student led night economy retail and drinking events, more noise and nuisance and have a detrimental effect on residential amenity for many of the people living in Fallowfield.

b) Existing problems of anti social behaviour in student accommodation on campus

The density of students on the University campus has created a lot of ASB which has repeatedly made national news during the lock down this academic year. A few examples of the recent problems on campus resulting in anti-social behaviour can be found in the following links and the montage of photographs in Figure 5.

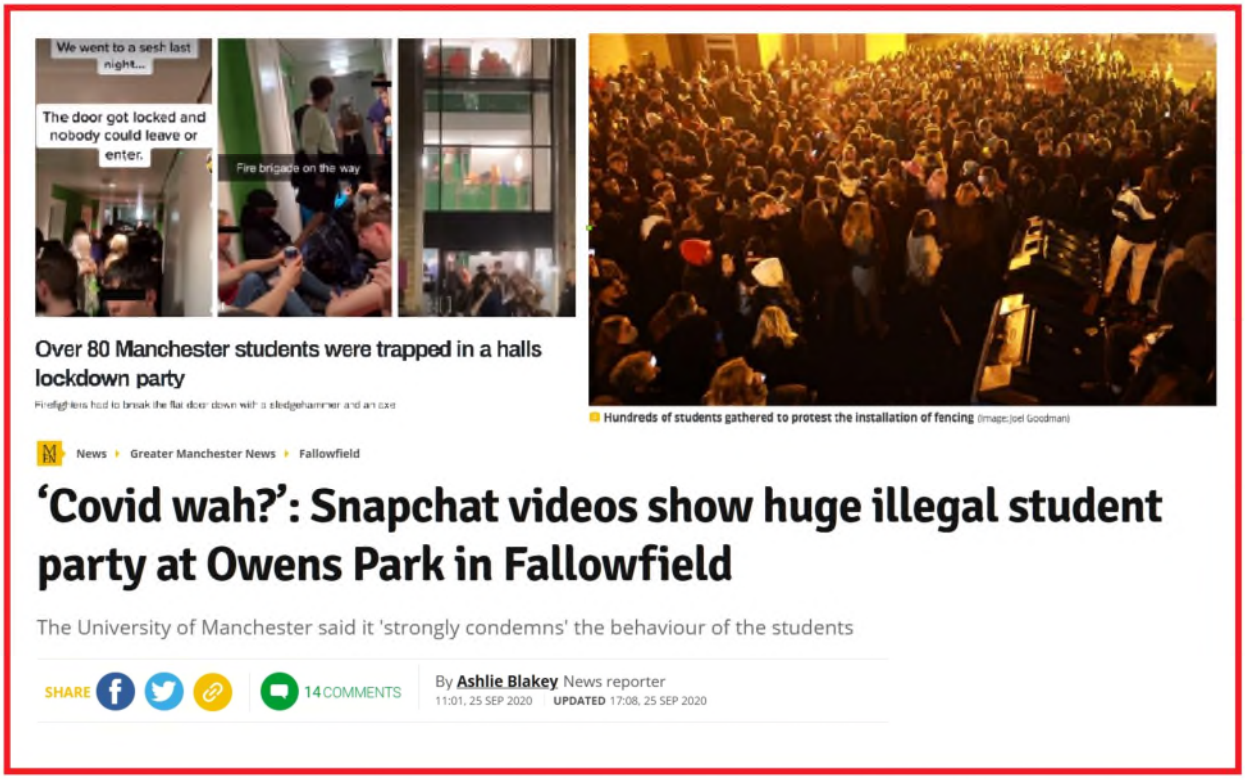


Figure 5: Examples of anti-social behaviour in UoM Campus Accommodation 2020

- https://www.manchestereveningnews.co.uk/news/greater-manchester-news/furious-students-tear-down-new-19231246
- https://www.theguardian.com/education/2020/oct/06/manchester-students-organising-covid-positive-parties

- https://thetab.com/uk/manchester/2020/12/01/over-80-manc-students-trapped-got-trapped-in-a-halls-lockdown-party-50350
- https://www.bbc.co.uk/news/uk-england-manchester-55130415

c) Impact on the general residential community of proposed additional 425 student bed spaces:
Policy H12 – there should be no unacceptable effect on residential amenity in the surrounding area through increased noise, disturbance or impact on the street scene either from the proposed development itself or when combined with existing accommodation.

Many of the residents in our group have lived in Fallowfield or Withington for many years and we have seen the effect of the landlord takeover and the huge increase in density of students in this neighbourhood. Students living on campus for their first year generally move to house shares in the residential community in their subsequent years at University. This has had a **devastating impact** on our neighbourhood.

- Rising anti-social behaviour linked with increase in night time economy;
- All night house parties in residential properties with nightclub equipment requiring MCC Out of Hours dedicated service for reporting, Top Twelve Party Streets identified, Night patrols during academic term time;
- Degradation of the area;
- Absent landlords leaving houses in a state of poor repair;
- Landlord fly tipping in alleyways, gardens and on residential streets;
- Loss of gardens to hard surfacing for easy, cheap maintenance;
- Loss of gardens to permitted developments increasing intensification;
- Rising levels of litter, graffiti, broken glass, drug dealing, vandalism and noise;
- High crime levels compared to other residential suburbs (Figures 3 & 4);
- Loss of variety of shops and services in Fallowfield District Centre and a large increase in licensed bars, nightclubs, off licenses and take-aways (Cumulative Impact policy for Fallowfield implemented in 2013);
- Loss of families, working age people, elderly;
- Loss of stable community, increasing transient population.

The unbalanced community cannot sustain any more young people. The addition of 425 extra students will add more pressure to the problems that the current unbalanced community suffers from. **Students living in PBSA are not contained on campus,** so they contribute to pressure of services under strain in Fallowfield and surrounding areas. As the Oakley development is on the edge of Platt Fields Park, we fear that the residents of Oakley would also see the park as their garden and playground.

A recent article on Fallowfield was published in Manchester Evening News in December 2020. the article goes into detail about the issues of an unbalanced population and the effects on the local community https://www.manchestereveningnews.co.uk/news/greater-manchester-news/fallowfield-reached-saturation-point-years-19053607:

'Fallowfield reached saturation point years ago... the pandemic has exposed the problems we knew were there'

The south Manchester suburb is currently the Covid-19 hotspot of England.

SHARE 12 COMMENTS By Beth Abbit 19:45, 6 OCT 2020 UPDATED 06:43, 7 OCT 2020 NEWS

d) Harm to residents in the vicinity of the Oakley House Site

Policy SP1 – Contrary to a sustainable Community

Policy T2 of the Core Strategy - The development will not adequately cater for on-site car parking to the detriment of the residential amenity of neighbouring properties, contrary to policy DM1 of the Core Strategy.

Policy H12 – there should be no unacceptable effect on residential amenity in the surrounding area through increased noise, disturbance or impact on the street scene either from the proposed development itself or when combined with existing accommodation.

Residents living in terraced homes on Langley Road currently face offices as shown in Figure 6. Figure 7 highlights the dominance of the proposed residences that would replace these offices. These would have 4 floors of bedrooms as shown in Figure 8 resulting in 88 bedroom or common room windows overlooking Langley Road residents. Noise from music and socialising is to be expected to emanate from windows especially in warm weather when windows will be open. **Fire alarms often go off during the night on campus** as drunken pranks or cooking under the influence. Where would the students all evacuate to without disturbing the neighbours?

This is very likely to affect the amenity for local residents especially as **University students often have different socialising hours to families and working people.** It is recognised that not all students behave anti-socially and many students in residences are also affected by the anti social behaviour of some of their peers. However when young people get together in groups, their voices are incredibly loud when socialising especially when alcohol is consumed. First year students are excited to be away from home and socialising has become a huge part of the student experience.

Figure 6: Current view of Langley Road

Figure 7: View from Wilmslow Road of proposed PBSA
Figure 8: The 88 windows of student residences facing residents on Langley Rd

The student residences would have a detrimental affect on the amenity for local residents on Langley Road and Hilltop Court flats and in neighbouring streets.

In addition, the application provides no parking. It is known to residents that many students bring cars to Manchester. Our streets are packed with them in term time and car parks are usually full on the Owen's Park campus. It is expected that students would bring cars and park on nearby residential roads. It is unrealistic to think that students will not bring a car. Many students need a car for placements (e.g. teaching, medicine, health care) and no provision has been made for this. Sometimes placements are located in schools, hospitals, clinics outside of the Manchester area and not accessible by public transport.

The development does not adequately cater for on-site car parking, contrary to policy T2 of the Core Strategy. Inadequate levels of on site car parking provision would place further pressure on off site car parking provision to the detriment of the residential amenity of neighbouring properties, contrary to policy DM1 of the Core Strategy.

e) More Purpose Built Student Accommodation (PBSA) will not free up family homes
Policy H12 - "PBSA should be located immediately adjacent to the core university areas, principally the Oxford Road Corridor area". Fallowfield is outside of this area.

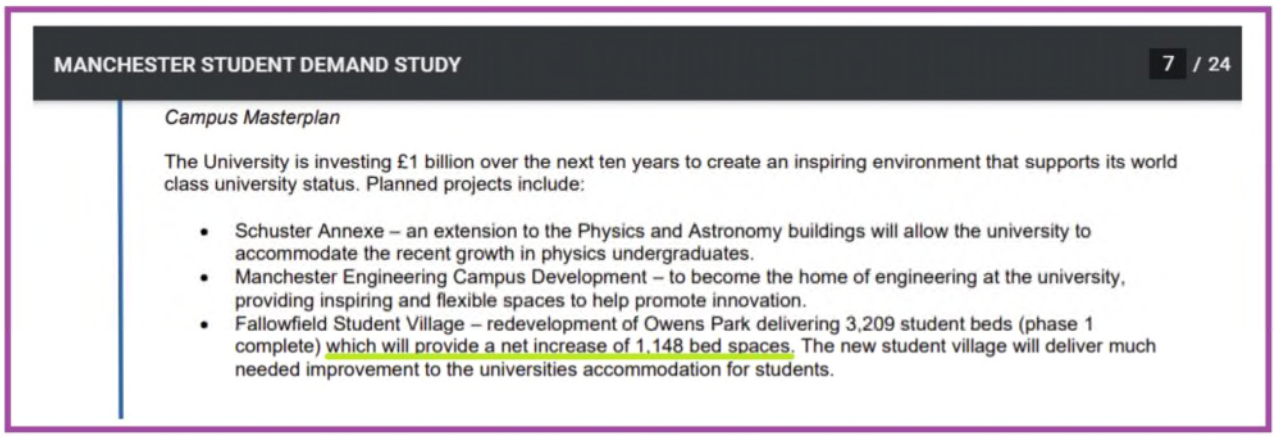
Council Policy updates at an executive meeting (decided in December 2020) state that PBSA should concentrate on areas close to the city centre and around the Oxford Road Corridor. Fallowfield is outside of this area and for this reason, the application should be rejected.

The applicant suggests that by accommodating students in PBSA, that this would free up HMOs in the community to become family homes but there is no evidence to support this.

Community Guardians in Fallowfield and other long term residents in areas of high student density in south Manchester are convinced that the extra bed spaces will attract first year students. These rooms are typical small hall of residence bedrooms with a communal lounge / kitchen/ diner. In first year, students make friends and then want a house share with more space and a garden for their subsequent years. We anticipate that rather than free up family homes, it would actually put more demand on student accommodation off campus for second and third years. Student accommodation is marketed to students to make them feel they are the only residents. Examples of a Property Blog highlight this "***Fallowfield is predominantly a student neighbourhood". "when it is sunny and warm outside, you will almost certainly venture to Platt Fields Park with a football in one hand and a Kopparberg Strawberry and Lime in the other".***
"New Zealand Wines Once you've discovered this gem of a shop you will never go back. Two bottles of wine for £5.00". *(student-cribs.com/blog/city-guides/10-things-every-student-experiences-in-fallowfield/)*
This area cannot absorb any more students; it is already unbalanced and unsustainable.

Demonstrating Demand The Student Demand study suggests that University student numbers are projected to rise and that because there is high demand for accommodation in Fallowfield, that this demand should be met. In 2016, MCC granted planning permission to expand Owen's Park by 1 033 beds from 2 176 to 3209 beds (https://www.manchestereveningnews.co.uk/news/greater-manchester-news/plans-200m-owens-park-project-10568786). The claim that there were no net gain in beds overlooks the fact that 800 of the new bed spaces replaced Grosvenor Hall bed spaces which were demolished. Grosvenor Hall was in the city centre so **there has already been a large net increase of students in PBSA in Fallowfield (+1 033).** In fact the Student Demand Study submitted with these plans shows a higher increase (**+ 1 148)** as shown in Figure 9.

Figure 9: Net gain bed spaces on Owen's Park during redevelopment



MANCHESTER STUDENT DEMAND STUDY 7 / 24

Campus Masterplan

The University is investing £1 billion over the next ten years to create an inspiring environment that supports its world class university status. Planned projects include:

- Schuster Annexe – an extension to the Physics and Astronomy buildings will allow the university to accommodate the recent growth in physics undergraduates.
- Manchester Engineering Campus Development – to become the home of engineering at the university, providing inspiring and flexible spaces to help promote innovation.
- Fallowfield Student Village – redevelopment of Owens Park delivering 3,209 student beds (phase 1 complete) which will provide a net increase of 1,148 bed spaces. The new student village will deliver much needed improvement to the universities accommodation for students.

The new block at Unsworth Park has only been open since September 2020 and there have been significant problems on campus this academic year. The lock down restrictions have prevented partying in HMOs so students have been going on campus to party instead.

The Student Demand Report summarises *"there are 12,390 full-time students living within the local Fallowfield area (within a 0.5-mile radius of the Wilmslow Road site), only 40 (0.3%) live at home and 3,918 (31.6%) live in PBSA, we can deduce that the remaining 8,432 (68.1%) full-time students live in non-PBSA accommodation/HMO accommodation within the mainstream private rented sector. The proposed scheme will provide high quality PBSA accommodation at an affordable price point, in a location where student demand remains very high (and increasing), where there is a serious deficiency of PBSA, and where there is continuing pressure placed on the mainstream housing stock. The proposed scheme will cater for proven demand and provide the potential to draw students out of HMOs in the local area, in a way that the more expensive city centre PBSA is very unlikely to."*

The **"potential to draw students out of HMOs" is not sufficient to demonstrate that it will.** We believe it will add more students to Fallowfield as reasoned above. We also disagree with the affordability claims. MCC Report to Executive Nov 2019 (4.3) states *HMOs in South Manchester remain popular - in part because they are cheaper on average than the direct-let PBSA sector. Average rents are roughly £100 per week for a room (£5,200 p.a. on a 52 week let length) in Fallowfield (including bills).* These figures match those provided by Manchester Student Homes. Their accredited properties average £95-£110 per week (source off Campus Affairs Officer, MSH). This is much cheaper than the prices being quoted by the applicant. Price is an important factor for students as is the opportunity to live in a house with friends. We anticipate a rise in students living in the community if this development goes ahead. Whilst the application is supported by a letter from UoM, this is not a formal agreement with a HEI for the supply of all or some of the bed spaces as required to prioritise the site for PBSA.

Furthermore, residents are already concerned about the additional impact of the extra bed spaces at Owen's park. In September 2020 the manager of Sainsbury's in Fallowfield told residents that profits were far higher than normal. These extra students at Owen's Park will be wanting to move into the community later this year. Because life on campus has been so bad for them this year, it is

expected that demand for HMOs will be higher than ever, especially properties with a garden. For most residents, the past year has been much quieter compared to most years because students have not been resident in their HMOs due to the pandemic and the closure of pubs and bars.

The impact for residents of the **additional 1 148 students at Owen's Park** is causing, and will to continue to cause harm to the residential community. There are also approved plans to turn Chancellor's Hotel into 64 more student bedrooms **(+64) on the Fallowfield Campus**. If student numbers increase by 425 more, families will leave and there will be even more unbalanced demography.

More than half of the population in this part of Fallowfield are students so residents are already in the minority. **We would urge you to take note of the harm to the residential community outlined in personal letters of objection**

It is difficult to keep families in the neighbourhood because night noise disturbance is so distressing to normal family life. Some new residents in Fallowfield have already moved away or are planning to move away because of the night time noise nuisance. **However, a family housing development built by Watkin Jones in Fallowfield in 2013 with covenants to prevent use as HMOs has been successful in providing family housing.** Whilst some of the family residents have struggled to cope with the noise and antisocial behaviour, many have settled and are valuable members of the community. Family housing would be a far more suitable use of the land on the USDAW site.

Adding more students to Fallowfield's unbalanced population will not promote Policy SP1 to create Sustainable Neighbourhoods of Choice. This is a key reason for the rejection of this planning application.

f) Existing environmental problems: Evidence to support the impact on the community: Contrary to Policy H12 & Policy SP1, Policy DM1

Long term evidence of anti-social behaviour linked to the night economy in Fallowfield has led to the introduction of Manchester's first Cumulative Impact Special Licensing Policy in January 2013. A similar Stress Area has been designated for Withington. Despite these special policy areas, anti-social behaviour has continued. Anti-social behaviour is linked to the intensity of University students in this area. To try and address these problems many council resources are spent in running Out of Hours services from 8.45pm to 4am. Visits from MCC, GMP and the off campus University officer are also made and Noise Abatement Notices often served. The council have identified streets with the worst levels of noise complaints from student house parties and these streets are patrolled on three nights per week during term time by University night patrol staff.

Street noise of passing students is often unbelievable and occurs on most nights of the week during term time. This is fuelled by events being run on most week nights as well at weekends by nightclubs in Fallowfield such as 256, Nest & Ziggy Sixx. Residents get woken up by students going out (typically 11pm-midnight) and then again on return (typically 2am -4am). Where there are house parties (with professional sound systems, door staff and guest lists), screaming and shouting can go on all night. These parties attract drug dealers and alcohol and takeaway deliveries. Residents in our group call the Out of Hours team to intervene but this can be a stressful process as it means residents have to report and then often have to wait up to speak to an officer and allow them access to hear the noise from within our homes.

Many financial resources are also spent on cleansing the area of litter. The volumes of end of term rubbish clear outs have also been so excessive that they have made national news. The sheer numbers of students concentrated in this suburb causes immense strain on all services and problems such as those seen in Figure 10.

Figure 10: End of term clear out rubbish; such sights are commonplace around Fallowfield in most alleyways around student tenancy turnover weekend end of June/beginning July

Figure 11 highlights the high number of interventions required by GMP, MCC & Universities for students living in the community during the academic year to date (September – December 2020). Despite the current pandemic and lock down, there have been significant numbers of cases of anti-social behaviour as demonstrated by the data in Figure 3. These are evidence of harm to the community, very real harm which members of our group regularly suffer. Residents often get woken night after night by groups of students going to and from social events in clubs and bars or between houses for pre drinking events or all night house and garden parties. As so many students live in this neighbourhood, they walk to destinations, disturbing many of us who live on streets that are on route. We then suffer their anti-social behaviour on their return to their HMOs. This causes a lot of residents sleep loss and anxiety. **The effect of recurrent sleep loss is known to be extremely harmful to health.** It also creates fear because sometimes drunken groups cause criminal damage to cars and property as they pass by. They also damage the street trees and tree bases that residents care for to improve the environment.

Figure 11: Academic term Sept-Dec 2020 Data for Noisy/ anti-social students living in the community

Summary Off Campus Interventions

During the first semester (September – December 2020) and of the many hundreds of student houses within off campus communities, we have been required to provide interventions at 446 houses in response to complaints regarding COVID regulation breaches, and noise / anti social behaviour.

GMP

200 students were issued with fixed penalty notices for COVID breaches off campus. The Antisocial Behaviour Action Team have undertaken visits to 97 off campus student properties to issue Premises Closure Order warnings. Following this, just one Premises Closure Order was issued.

Manchester City Council:

The Licensing and Out of Hours Team have undertaken 50 visits to properties to follow up on repeat noise complaints and issued Noise Abatement Notices to 24 properties.

Universities

At the University of Manchester, 70 students residing off campus have been engaged via the disciplinary process. At Manchester Metropolitan University, 65 students residing off campus have been engaged via the disciplinary process. These referrals were made by Manchester Student Homes.

Data in Figure 11 is for the pandemic period. Problems of antisocial behaviour have been rampant for years. Complaints and logs show that there is a continuing problem of harm to the community. It takes many students the full three years of their stay in Manchester to realise that there are other members of the community and there are concerted efforts by Off Campus University Officer and MCC Officers to try and educate students about community cohesion. It's a recurring educational campaign. By the time students work out how to manage their bins and that they need to keep the noise down, they move on and the process has to start again. The Universities seem to ignore the problems of social responsibility of their students living in the community. Many students have spoken to Community Guardians and expressed horror that we could actually live in Fallowfield. They are aware that most students like to party particularly in their second year and the party place is Fallowfield.

There is an immense of amount of data to support the fact that there are **existing environmental problems including noise and anti-social behaviour** without the addition of more young people into our neighbourhood. This planning proposal is therefore contrary to policy DM1.

There is significant harm to the community due to the unbalanced demography with 64% student population in the postcodes around the Oakley site. **This application is completely contrary to policy SP1 to create sustainable neighbourhoods of choice.**

2. The harm to the environment and users of Platt Fields (particularly young children)
Contrary to Policy EN9 Manchester Core Strategy for new development to maintain existing green infrastructure

Park Users
The proposed development will create harm for the users of Platt Fields Park. The proposed high rise tower block will overshadow the park and spoil the visual amenity of natural tree lines which surround the park. The attractive spire of Holy Trinity Platt Church is aesthetically pleasing but a 13 storey tower block is not. Reference is made to the Owen's Park tower which is some distance away and is due for demolition. The tower block near to the iconic Toast Rack is also referred to by the applicant but may never be built. We see this as no justification for creating a monstrous tower next to a very well used public green space.

Residents in our group enjoy using this park for all sorts of leisure activities. However, the park is often used by hundreds of University students and this already causes residents to avoid the park during the academic term. Groups of students socialising in the park can be very loud and often use language that parents do not want their children to listen to. These groups of students often consume alcohol and drugs in the park as part of their socialising. This can lead to anti social behaviour which is particularly unsuitable for young children to witness. The park is close to many schools including St James' CE Primary, Manchester High School for Girls and Manchester Grammar School. Many parents with children at these schools want to enjoy the park facilities. The park needs to be accessible for all sectors of the community. Adding another 425 students to accommodation without amenity space will effectively turn the park into a garden and playground for an additional 425 students. It shouldn't be forgotten that there are thousands more students in the local area whose landlords have removed all amenity garden space by building extensions to maximise occupancy and profits. Fallowfield Brow is home to many of these and the park is already their garden.

Trees & wildlife
We are concerned that many of the mature trees around the perimeter will be damaged during construction and this loss would have a detrimental effect on biodiversity for insects, birds and wildlife. Platt Fields is known to have many species of bats and we consider that the light and noise pollution from the proposed accommodation blocks will cause considerable environmental harm to wildlife. It is noted that in the Ecological Appraisal (4.10) that "in addition to the buildings,

seven mature trees were noted as having potential to support roosting bats and that three trees with bat roosting potential are to be felled to facilitate the proposed development (BT4, 5 & 7), and tree pruning works may be required on trees to be retained" It is clear that wildlife will be affected by this development.

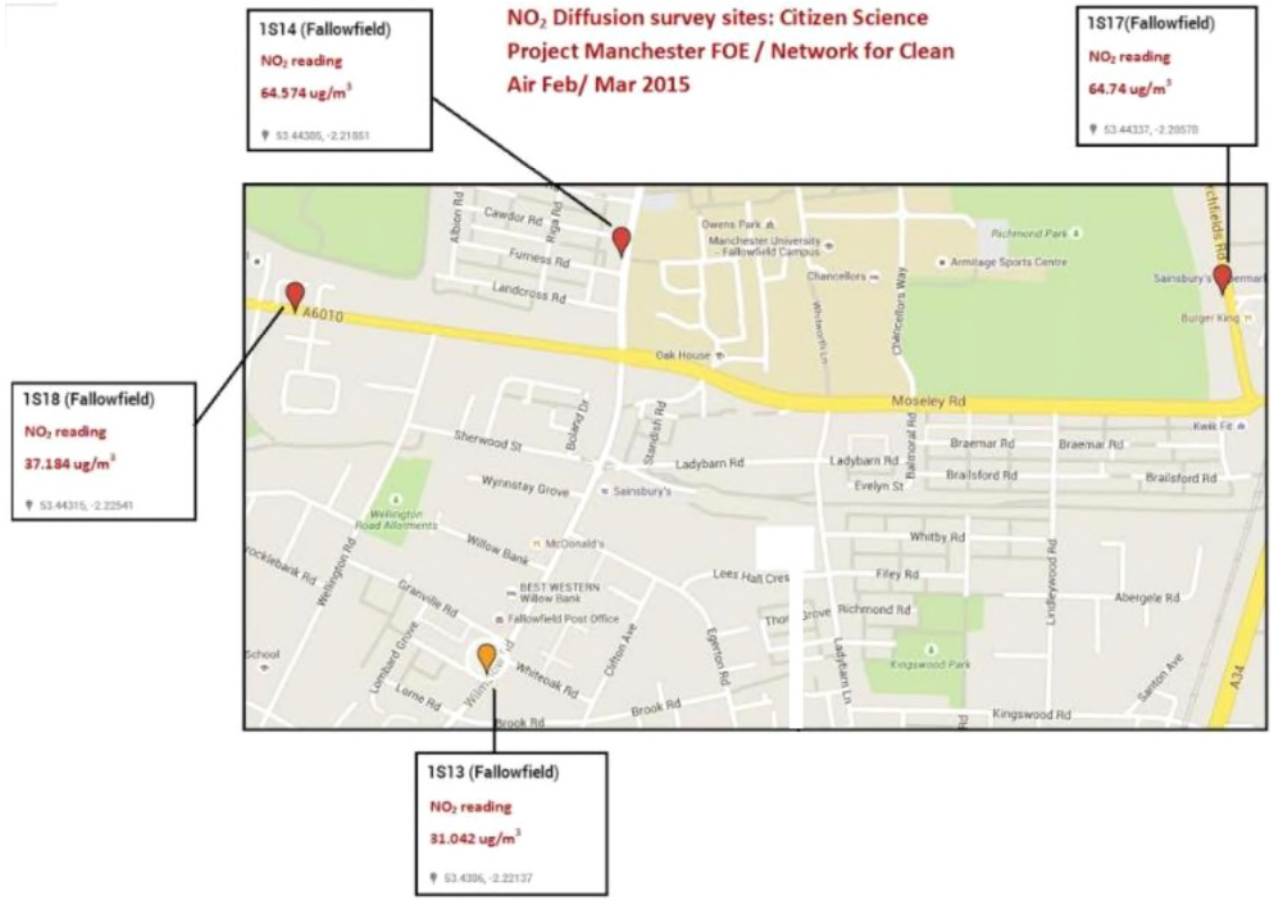
Whilst we are not experts of trees, we support the views of Friends of Platt Fields and Victoria & Fallowfield Civic Society who write in more detail on the effect on the trees in Platt Fields in their objections. We are concerned about the potential damage to mature trees on the boundary of the site which are likely to be damaged through deep excavations for the foundations of such large buildings.

Air Pollution

The additional 425 students will add to the congestion on transport routes and thus contribute to more air pollution. This number of students is equivalent to six full double decker bus loads of extra people to be transported along the heavily congested bus route (Europe's busiest) to University lectures. At peak times bus users already find their bus journeys slow. Bus frequency along this route during non pandemic times are every minute. Outside the Oakley Villa site, there is already the biggest (and ugliest) bus shelter in Europe which is regularly fly posted with student club events and littered with broken glass and empty wine bottles (discarded before getting on the night buses). The volume of students make a normal 20 minute bus ride into a 40 minute journey at peak times. The roads frequently suffer huge potholes due to the frequency of bus traffic and this adds to the danger for cyclists. Additional students at this site will create more demand for buses and increase air pollution. Air pollution along Wilmslow Road already regularly exceeds World Health Organisation recommended levels long this bus corridor.

FOE Manchester helped to organise a Citizen Science air pollution NO_2 survey in March 2015 which Community Guardians also participated in. NO_2 diffuser tubes were left in situ for 30 days and analysed at a national laboratory. **NO_2 recorded on Wilmslow Road near the Oakley site (site S14) was 64.7ug/m3**,**well above the EU limit of 40ug/m3** as shown in Figure 12.

Figure 12: Citizen Science data 2015, map of results FOE



Extra bus demand created by more students at Oakley will add to air pollution levels. This is contrary to The National Planning Policy Framework (NPPF) in relation to Air Quality that the Planning system should contribute to and enhance the natural and local environment by: "preventing both new and existing development from contributing to or being put at unacceptable risk from, of being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability"(Para 109). In April 2015, the Supreme Court ordered the UK government to cut NO_2 pollution levels because of the high number of deaths attributed to air pollution. Local authorities are expected to help reduce NO_2 pollution. Many of the buses on this route are diesel which contribute significant pollutants to the atmosphere.

Light pollution

There will be significant light pollution created by 425 bed spaces in the proposed accommodation. Students are often nocturnal in their socialising and this will mean a lot of extra light from these accommodation blocks during the normal night time hours. This will have an impact on bats and other wildlife such as badgers who are sensitive to light pollution but will also be detrimental for those living in residential properties nearby.

3. The harm to the setting of the Villa

Oakley Villa is a heritage asset, one of few remaining in this area. Whilst it is not a listed building it has many fine Victorian features and is set in gardens which have provided calm to this area. In contrast the 13 storey tower and 4/5 building around the perimeter will not enhance the setting or continue to provide calm. It will be a site occupied 24/7 by 425 students, most of whom will be just 18 years old and away from home for the first time.

Figure 12 highlights the calm setting of Wilmslow Road near the Oakley entrance on a postcard (1908). The contrasting recent photograph (Figure 13) shows students walking down Wilmslow Road at 3am after a night out. This is indicative of the harm this causes to residents in homes along Wilmslow Road and all the surrounding streets where they branch off. Light and noise pollution, alcohol and take away litter harm the environment and cause loss of amenity for residents who have the right to sleep at night. More students adding to the night economy noise and ASB will harm the setting even more.

Figure 12: Wilmslow Road 1908 near the gates of Oakley Villa

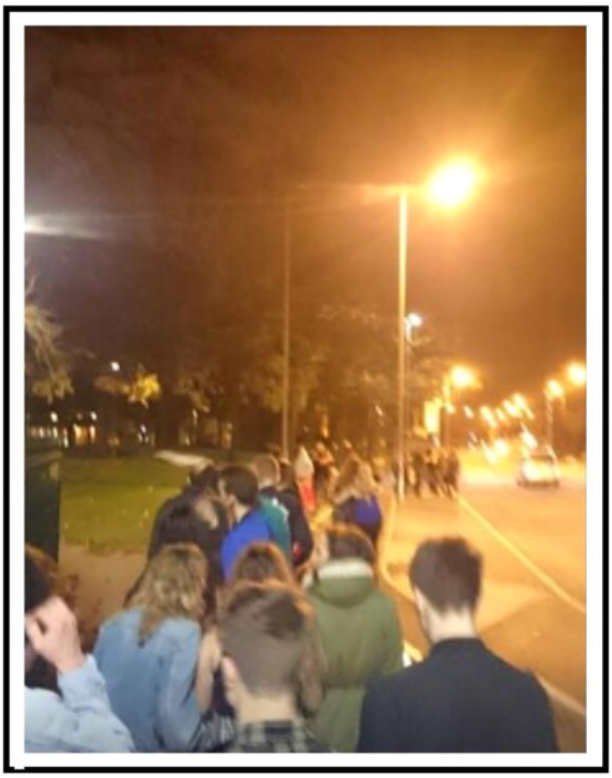


Figure 13: Wilmslow Road 3am students returning to their halls, flats, HMOs after a night out

The extension of the Villa is art deco and no consideration seems to have been given to preserving this. We consider the demolition and large mass of buildings proposed to be highly energy intensive and costly to the environment in terms of carbon emissions. A significant reduction in carbon emissions could be achieved by upgrading rather than demolishing. **We feel that this site would be ideal for mixed housing, with the Villa itself converted into luxury accommodation.** In this way, USDAW would leave a legacy of benefit to the neighbourhood and provide much needed family housing which would not harm the community or Platt Fields Park whilst also preserving the heritage of an important Victorian Villa.

The Villa is also set close to the boundary of the Park and we consider that the tower in particular will spoil the views from Wilmslow Road and within the park. The tower block is particularly out of character to the surrounding area and would create an overbearing structure on nearby Platt Fields. We consider that the building along Langley Road would cause harm to immediate residents on Langley Road and other neighbouring streets by the height and the number of student bedroom windows from which noise is bound to emanate (day and night). The height of the tower contravenes the Tall Buildings Policy and is considered an incongruous feature in the street scene that would have an adverse impact on the visual amenity of the area. **This is contrary to policies SP1 and DM1 of the Manchester Core Strategy and guidance contained in the Guide to Development in Manchester Supplementary Planning Document and Guidance.**

4. The Pandemic and Future Effect of HE

The applicant suggest that whilst there might be a small dip in University student numbers due to the pandemic, the demand for PBSA will continue to rise in coming years. We think this is very speculative and likely to be very inaccurate. The pandemic is having long lasting consequences and it is likely that there will be profound changes to working practices. This is likely to include a reduction in numbers at University. Many potential students are likely to choose apprenticeships over degrees because of the recession and the consequences of building up large student debt with the prospect of no guaranteed job after graduating.

Online learning for students from home is much more likely to increase especially if the socialising aspect that lures them to Fallowfield continues to be curtailed due to social distancing restrictions. Student well-being is also a factor that needs to be considered. Many students do not want to be housed in high rise tower accommodation due to a sense of isolation.

It is likely that due to pandemic restrictions many international students may study at Manchester Universities online in the future. This will reduced the need for PBSA significantly.

Whilst nobody yet knows the full extent of the pandemic on learning, it is likely to significantly change University education with more students choosing to live at home and study at a more

local University as is common in most other countries in Europe. The future for PBSA is extremely uncertain in current times and we think the site would be much more viable for family homes of which there is a desperate shortage.

Conclusion

The view of Community Guardian residents is that this is an unsuitable proposal which should be rejected because it a large new development in Fallowfield and is counter to policy H6 of the Core Strategy which states that all new developments in District Centres should be mixed use. The population of the surrounding areas (sub postcodes M14 6&7) already has a very unbalanced and unsustainable population made up of 64% students. This is contrary to Policy SP1 to create sustainable neighbourhoods of choice.

The Owen's Park Redevelopment under construction is providing an additional 1 148 bed spaces (+ 64 at Chancellor's Hotel) to PBSA in Fallowfield which will add incredible strain to this area already under stress. Adding a further 425 student bed spaces next to Fallowfield Brow residential housing would create harm to the amenity of residents near the site as well as those in the wider area. Students are not contained on campus and will spill into the community adding more noise, anti social behaviour and attracting more criminal activity.

The residential amenity of park users will also be affected by the sheer size of the tower which is out of keeping and will spoil the skyline and create an urban distraction.

This application would cause a lot of harm to the residential community. We feel that there are many better uses of the site that could be explored which could include mixed housing with the heritage villa being converted into luxury apartments. USDAW would in this way be contributing to the good of the community rather than leaving a legacy of harm.

Members of our group are also members of other local groups including SEFRG, Victoria & Fallowfield Civic Society, Friends of Platt Fields, Sherwood TRA and Withington Civic Society. We have seen the submissions from these groups and support their views.

Thank you for considering the views of residents.

Yours

[redacted]
Community Guardian Coordinator
Fallowfield & Withington