

FAO: Dave Morris, Planning – Manchester City Council

Monday 3rd August 2020

Dear Dave

Application Number: 127300/FO/2020
Re: 8 Birch Polygon, Manchester, M14 5HX

We would like to strongly object to the planning application in relation to 8 Birch Polygon as follows:

A) It is contrary to Manchester City Council's Policy which prioritises family housing

To convert No8 Birch Polygon into 5 self-contained flats would not only be unnecessary, but also contrary to Manchester City Council's core policies which recognise the primary importance of good availability of high quality family housing.

We note that Core Strategy Policy H5 states:

*'Central Manchester, over the lifetime of the Core Strategy, will accommodate around 14% of new residential development. **Priority will be given to family housing and other high value, high quality development where this can be sustained.***

And also:

*'The emphasis will be on **increasing the availability of family housing** and diversifying housing stock in mono-tenure areas, preserving and improving the quality of the existing housing stock and the management of areas where HMOs predominate'*

Likewise Core Strategy Policy H11 states:

*'In parts of Manchester which do not have a high concentration of HMO/student housing but where the lack of family housing has threatened the sustainability of the community to the extent that regeneration activity with the specific intention of increasing the amount of family housing has taken place, **there will be a presumption against changes of use which would result in the loss of a dwelling which is suitable for a family.***

In Core Strategy for Manchester Policy SP1, we also note the emphasis on 'creation of neighbourhoods of choice' which are appealing to families.

This development would not be consistent with this aim, nor it would seem be consistent with Section 8 of National Planning Policy Framework (Promoting Healthy & Safe Communities).

Whilst some of the development (2x1 bed apartments/2x2 bed apartments/1x3 bed apartments), 'technically' may support families, they are not large family accommodation and we strongly suspect not the size/type of family housing that Core Strategy H5 seeks to protect and promote. In any event, they will be considerably less attractive to even smaller families due to their small size and lack of any substantial private outdoor space.

We note, for example, that the 'garden' for Apt 2 is very small and of very poor quality- enclosed heavily on all sides etc). We note as well that the Manchester Residential Design Guide acknowledges the importance of amenity space:

'Providing outdoor amenity space that is well-located, safe and well-landscaped is necessary in certain types of accommodation, depending on who is living there and over what period of time.'

In these COVID times where suitability of good amenity space for families has been underlined even further, it is extremely difficult to imagine these developments having any appeal for families.

The most likely demographic for this nature of development, we strongly suggest would not be families but rather sharers, students or young professionals.

B) An unnecessary loss of a larger family home

We think that converting No8 Birch Polygon into 5 self-contained flats (as well as being contrary to local planning policy) is simply an unnecessary loss of an attractive and desirable large family dwelling that would really benefit the sustainability and vibrancy of the local community.

Whilst we recognise that in some situations it may be necessary, as a last resort, to convert larger dwellings into smaller flats in order to make them viable, but this is fundamentally not the position with No8 Birch Polygon.

Larger (especially characterful ones such as No8) family dwellings are highly desirable in the local area and rare to market. We have attached a recent valuation letter on our own property from established local property experts JP Brimelow which helps to confirm this more formally, stating specifically:

"There is a genuine shortage of properties across this area and a good supply of ready to go buyers. There is especially high demand for larger properties, such as yours, particularly 5-6 beds, which are very rare to market"

Whilst previous applications have either referred to the property as a HMO or sought (unsuccessfully) to have it declared as such, the fact is that it remains a single dwelling house (use class C3) and would be perfect for a large family seeking to establish themselves long term in the area.

Local area/Community

We thought it might be both helpful and relevant to highlight and why this locality is attractive to families, and the strength of local community spirit:

In terms of surrounding infrastructure/amenities the local area contains:

- 1) Remarkable availability of highly rated primary/secondary and sixth form options, all within very easy reach of 10 Birch Polygon (M14 5HX) -see full list and details at [Appendix 1](#)
- 2) A vibrant and thriving local community centre (Birch Community Centre) which hosts Playgroup and After School Club, as well as a wide variety of local community events such as theatre, scouts, martial arts, musical concerts, annual summer and winter fairs, local allotment shows, community 'bring and share' lunches and regular community evening functions/ad hoc community party socials (including a 'pop up' bar).
- c) A large local park (Birchfields Park).

We moved here in 2007 from a smaller family house on the Withington/West Didsbury border, seeking a large family house and attracted by the strength of local community spoken about so enthusiastically by people we knew living in the area already. We are bringing up a family of four young boys in a five bedroom property all of which attend local schools (St James and Trinity High School).

When we bought our house, it was clear larger local family properties change hands infrequently and we were quite taken aback by how positively we were received and how strong the local community actually was.

This characteristic of the local area has travelled by 'word of mouth' for years is well known within local area, making the area highly desirable for families.

The availability of larger family housing, which encourages residents to settle in the medium to long term, is therefore an integral part of the ongoing strength and stability of this local community.

C) Previous similar determinations

This priority focus on retaining quality family housing was a core consideration in the recent rejection in February 2020 of the appeal from other developers to convert neighbouring 10 Birch Polygon) from a single large family dwelling house (6 bedrooms) into 4 self-contained flats. A copy of the full decision accompanies this email.

In that instance the Planning Inspectorate encouragingly upheld Manchester City Council's prior decision to preserve family housing in the area.

An extract from the decision reads:

Loss of Family Housing – 10 Birch Polygon
Family housing 12. Whilst the evidence and my observations on site indicated that flats and apartments are common within the locality, so too are family sized dwellings. Although the property appears to have been subject to a period of dis-use the evidence suggests that it was in use as a single dwelling until it was vacated. The proposal would result in the loss of a larger family sized dwellinghouse. 13. The Council's policies encourage a mixed and diverse community through retaining or attracting economically active households to central Manchester, with an emphasis on increasing the provision of family housing. As a result of my above findings on living conditions, the particular configuration of the appeal proposal does not readily lend itself to being family accommodation, whereas the existing dwelling, while large in size, could. Accordingly, the proposal would result in the loss of a unit that could be suitable for family accommodation. 14. The appellant suggests that this is not an area where families requiring such a dwelling would want to live and that there is subsequently very little demand for a larger family dwelling in this location. However, very limited evidence has been supplied to justify this position and I can only therefore afford this matter limited weight. 15. I conclude on this issue that the proposal would have a significant adverse effect on the range of housing provision, with particular regard to family accommodation. Therefore, the proposal would conflict with policies SP1, H1, H5 and DM1 of the CS and guidance within the SPD which has similar aims

We have also set out at [Appendix 2](#) planning appeal decisions where other similar developments have been considered. These highlight the consistent approach by Manchester City Council and the Planning Inspectorate in prioritising the promotion and preservation of local family housing. Full copies of these decisions accompany this email for ease of reference.

D) It is inconsistent with Manchester City Council's Policy on 'high density housing'

The provision of 5 self-contained flats at 8 Birch Polygon can be regarded as high density housing compared to a large single family dwelling.

We note that Policy H5 identifies locations where high density housing will be supported. However, the subject site is not located within or adjacent to the Regional Centre, nor within Hulme, Longsight or Rusholme District Centre. As such there is clear conflict with this adopted development plan policy.

In the recent decision to refuse the conversion of 10 Birch Polygon, it was great to see the Council uphold its policy of retaining accommodation for families in this area.

Unlike other parts of Rusholme, this local area is much more characterised by larger family housing.

It is pertinent that Manchester City Council have introduced an Article 4 Direction which removes permitted development rights to convert dwellinghouses to HMOs.

Whilst relating specifically to HMOs one of the main issues this was brought in for was to combat the loss of family accommodation and the negative impact this was having on communities such as Rusholme.

The introduction of Article 4 highlights that this is a key concern of the Council.

E) Size and Mix of Apartments

Whilst at first review the apartments (only just!) meet the minimum space standards set by The Manchester Residential Design Guide for new residential developments, we are advised that it is possible, in relation to Apt 5 which is set in the loft space, that floorspace of less than 1.5m may erroneously have been included in calculations of available floor space. We cannot confirm this, but thought worth asking the question in case it perhaps had.

Irrespective, two apartments of the development (i.e. 40%) are one bedroom units which runs contrary to Manchester City Council's Checklist (2008) which states

"The Council at present would only look to **33%** of any residential development to be one bedroom units, with the rest being two bedrooms or larger units, in order to achieve a more sustainable and stable population within the City Centre'.

The scheme is therefore contrary to the Council's desire to create more sustainable neighbourhoods of choice. Likewise, it is contrary to Core Strategy Policy SP1, Core Strategy Policy H5 (promoting family housing) and also Sections 8 & 12 of the NPPF.

F) The Extension

The proposed additional extension is over development and again, just unnecessary. This is already an excellent sizeable property with great potential to serve as large family home.

It has already been extended once. If the further development was allowed, the total size of the extension would exceed the 3.65m maximum noted by Saved UDP Policy DC1.3

G) Car Parking and Site Layout

A lot of these points just spring out of the fact the proposed development would see the property being unnecessarily overdeveloped with significant negative impact to surrounding properties (whilst also providing substandard facilities/amenities for its residents).

From the plans submitted, there are number of issues that we would like to highlight:

- i) The car parking provision involves an active car park to the rear of the property which would be highly detrimental to the surrounding/adjacent properties

This would have a really negative impact on not only us at 11 Birch Grove, but also our neighbours at No 9/No 7/etc) and No 6 Birch Polygon (which would then even have a car park on either side of it!). It would also detract significantly from the garden at No10 Birch Polygon which we expect will now operate as a large family house and be requiring high quality garden/amenity space.

On Birch Grove we only have modestly sized gardens, which back right onto this proposed car parking space and will therefore be very negatively impacted by the inevitable increase in noise from vehicle engines & doors closing, as well as disturbance from vehicle headlights etc (especially as the vehicles would be coming very close to the boundaries with our properties).

This is even more relevant for us, given there are also (approved) plans for car parking provision at the rear of No12 Birch Polygon (which backs onto part of our rear garden) for a (yet unbuilt) extension there. This would mean we would have two active car parks to the rear of our garden (which is also a heavily used family garden) with all the associated negative noise, visual implications and change to the character of the surroundings.

It is also relevant to note that if a car park was allowed it would not only sandwich No6 Birch Polygon but also No10 (and their garden) between two car parks/primarily hard standing rear areas. Surely this can't be ideal?

ii) Negative impact on character/visual amenity

More generally, the proposed car parking and associated surfacing would erode the landscape setting of the building harming the character of the area and visual amenity.

The area itself generally is positively characterised by mature landscaped rear gardens that would be negatively affected by the provision of the hard surfacing associated with car parking.

The proposed car parking at the front (two very tightly arranged spaces) would also mean the potential very little soft scaping towards the front of the property, and a general predominance of just car parking and hard standing. By contrast a well-set family home with excellent soft landscaping and small front garden/trees/shrubs etc, would be a much better visual asset/benefit to the street.

iii) Loss of biodiversity

Until very recently the area to the rear of No6 was a mature garden with trees, and could readily be returned to such.

Putting a car park there would mean a significant permanent loss in biodiversity (and therefore contrary to Sections 12 and 15 of NPPF which seek to promote an increase not reduction in biodiversity), just replacing garden with hard standing. This would make a permanent and negative change to the character of the surroundings.

iv) Insufficient amenity space

The rear area is badly designed. Once developed with car parking spaces, there is hardly enough amenity space for four apartments which would be sharing the space.

v) Parking Implications

Whilst the car parking provision meets the minimum 'starting point' set out by The Manchester Residential Design Guide, given these are larger apartments with (again with the distinct likelihood shared users) with higher levels of occupancy, it is extremely difficult to imagine only one car per unit. Much more likely is the challenge of additional cars and increased on-street car parking/parking challenges.

vi) Provisions for alternative transportation

Whilst a cycling storage facility in the basement has been indicated,

this looks rather awkward to use in practice (90 degree turn etc) and much less easier to use than an external secure storage facility that might have been expected had their been more space. Again, we would suggest, just another compromise flowing out of trying to overdevelop the site.

H) Disabled Access

We are advised that the MCC's Validation Checklist (2018) states that details should be provided of accessible bedrooms and at least 10% of residential units need to be DDA compliant. The application drawings do not suggest that any regard has been had to providing disabled access into and within apartments.

As a result there is conflict with Core Strategy Policy DM1, an Saved UDP Policies DC5.1 and DC7.1. If disabled access is not possible then justification should be provided by the applicant.

Again in this regard it is in conflict with Sections 8 and 12 of the NPPF.

I) Summary

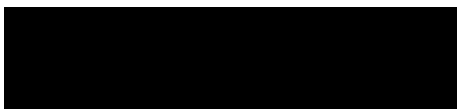
We appreciate the local council has to consider many potentially different interests, but are encouraged by its active policies focusing on prioritising family housing which is crucial to ensuring strong, sustainable local communities.

No8 Birch is not in need of 'rescuing' by a breaking it down into flats/apartments. It is a potentially magnificent large family home that could be a real asset to a large family seeking a prestige home, as well as the local community generally. To see it irrevocably converted into apartments when there is real demand for these types of properties would be entirely unnecessary and a real shame.

Additionally, to allow it to be converted into apartments would also create a substantial negative impact (in so many ways) to the adjacent properties, character of the local surroundings, and general local community.

As long standing local residents who are hugely committed to the wellbeing of this area, commit hours of voluntary service to make it a better place, we would simply like to urge you as strongly, and yet as politely as possible, not to allow this excessive and unnecessary overdevelopment.

Yours sincerely



APPENDIX 1

(0.3m away) - St James, Birch-in-Rusholme - A very good, well led, friendly community minded local primary school - Rated 'Good' by Ofsted in Oct 2017.

(1m away) – Birchfields Primary School – rated 'Good' by Ofsted in most recent visit.

(0.6m away) - Manchester Grammar School – Highly regarded (North West Independent Secondary School Of The Year 2018 – Sunday Times Schools Guide 2018))- includes Junior School (From Y3 right through to sixth form).

(1.8m away) -Trinity High School state funded school including sixth form, rated 'Outstanding' by Ofsted in both 2014/2017).

(0.6m away) - Manchester High School for Girls – Highly rated (North West Independent Secondary School Of The Year 2019 – Sunday Times Schools Guide 2019)

(1m away) - Xaverian College – Sixth Form College – currently rated 'Outstanding' by Ofsted.

(1m away) - MEA Central – brand new (Sept 2017) secondary academy, yet to be rated by Ofsted

(1.5m away) – Withington High School for Girls – highly rated (North West Independent Secondary School Of The Year 2020 – Sunday Times School Guide)

APPENDIX 2

Location/Proposal	Comments
9 Daisy Avenue, Manchester, M13 0LY Conversion of existing three bedroom dwelling to one x 3 bedroom dwelling and one x 1 bedroom dwelling.	One of the main issues of this appeal related to ‘the effect of the proposal on the range of housing provision, with particular regard to family accommodation’. Within the assessment the Planning Inspectorate noted that the appeal site is a two storey semi-detached dwelling within a small avenue of similarly sized dwellings. The dwellings were predominantly if not exclusively family sized dwellings. The Planning Inspector considered that the internal and external space of the proposed property and the living conditions provided mean that the property would not readily lend itself suitable for family accommodation whereas the existing dwelling does. He therefore concluded that the proposal would result in loss of a unit suitable for family accommodation. Furthermore, that loss would be within a street where flat conversions are not a predominant or an established feature. The appeal was dismissed.
20 Bosley Avenue, Withington, Manchester M20 1BQ Conversion from dwelling house into . two x 2 bedroom self-contained flats with two storey side and part single storey, part two storey rear extension	One of the main reasons of this appeal related to ‘the effect upon the supply of housing suitable for family occupation in the area’. Within the assessment the Planning Inspectorate noted that the site is located outside certain areas where higher density development is supported by policy. He notes that the proposed 2-bedroom flats would be less suitable for occupation by families. He also states that although policies do not include a specific presumption against the loss of family homes (in South Manchester), it reasonably follows from policies seeking to increase the availability of family housing that the loss of family housing should be avoided where possible. The Inspector goes on to state that given the proximity of the appeal property to other family housing he is not satisfied that the presence of nearby flats justifies the harm arising from its loss.

	The appeal was dismissed.
9 Oakdene Street, Manchester M9 4NL Retrospective change of use from dwelling house to two x 1 bedroom flats	One of the main reasons of this appeal was ‘the effect upon the supply of housing suitable for family occupation in the area’. In considering this issue the Planning Inspector states: ‘The subdivision of the existing property from a three bedroom dwelling into two self-contained one-bedroom flats has resulted in the loss of family housing for which a need has been identified. Policy H3 of the CS does not specifically state that proposals which involve the loss of family housing in North Manchester will be refused. However, the site is not within or adjacent to the nearest district centre on Moston Lane where higher density housing is permitted. It is therefore reasonable that the application of the policy, in seeking to prioritise family housing in this location, intends that the loss of such existing housing should generally be avoided’. The appeal was dismissed.

91 Palatine Road, Manchester, M20 3JQ Conversion of the existing single dwelling house into four self-contained flats, and associated external works, provision of car parking spaces, altered access, bin storage and landscaping	One of the main issues of this appeal was ‘the effect of the proposed development on the mix of housing provision in the locality’. 5 four self-contained flats, and associated external works, provision of car parking spaces, altered access, bin storage and landscaping. The Planning Inspector notes that policy states that high density development will only be appropriate within various district centres, as part of mixed-use schemes and that outside the district centres priorities will be for housing which meets identified shortfalls, including family housing. The Inspector goes on to state that the proposed development would result in a large single family dwelling house being lost and replaced by a high density flat development outside of a district centre. She goes on to state ‘although policies do not specifically presume against the loss of family homes in South Manchester it seems to me that the logical conclusion of the application of the policies in seeking to increase the availability of family housing in the locality is that the loss of such existing housing should be avoided’. The appeal was dismissed.
--	---