

Mr Dave Morris
Planning & Regeneration
Manchester City Council
M60 2LA

3 August 2020

Dear Mr Morris

Reference: 127300/FO/2020

Address: 8 Birch Polygon, Manchester M14 5HX

Proposal: Erection of a single storey rear extension and conversion of property to provide 5 no. self contained apartments with associated elevational alterations, car parking and landscaping.

Re 127300/FO/2020

We are writing on behalf of the Committee of the Rusholme, Moss Side & Fallowfield Civic Society to make a representation **against** this application. _____

Please note that the Civic Society has an active committee and a membership of 161, and works, on behalf of the residents of Rusholme, Fallowfield, and part of Ardwick wards, on objectives that include:

- a) To encourage the preservation, development and improvement of the features which go to make pleasing conditions in which to live and work.
- b) To encourage high standards of architecture and town planning in the area.

We consider that the planning application is contrary to a number of Manchester City Council's adopted planning policies. On this basis, we request that the planning department determines/recommends **refusal of the application**.

Please find full details of our objection below.

With respect to the Council's Local Plan:

1. **Core Strategy - Policy SP1 Spatial Principles.** This policy requires that *development in all parts of the City should:- Make a positive contribution to neighbourhoods of choice including:-*
 - *creating well designed places that enhance or create character*
 - *making a positive contribution to the health, safety and wellbeing of residents*
 - *considering the needs of all members of the community regardless of age, gender, disability, sexuality, religion, culture, ethnicity or income*
 - *protect and enhance the built and natural environment.*

The proposed development erases the majority of landscaping and all existing trees from the plot; it will increase noise and air pollution and will be detrimental to the quality of life for the local residents.

The overlay of pedestrian and vehicular access still remains H&S risk. The natural environment has already suffered from the proposal. If implement the development will cause permanent damage to the character of the area.

As such, **this proposal is contrary to policy SP1.**

2. **Core Strategy – Policy H1 Overall Housing Provision.** This policy states that *Within the Inner Areas in North, East and Central Manchester densities will be lower but generally around 40 units per hectare. The type, size and tenure of the housing mix will be assessed on a site by site basis and be influenced by local housing need and economic viability.*
This proposal is in the Inner Area in Central Manchester, and proposes a density of 5 units in 0.0516 hectares. This is a density of c 94.4 units per hectare. This represents a significant over-development (more than twice) of the site. **This proposal is contrary to this element of policy H1.**
3. **Core Strategy – Policy H1 Overall Housing Provision (contd).** This policy also requires that: *Proposals for new residential development should take account of the need to: ...Reflect the spatial distribution set out... All proposals should make provision for appropriate usable amenity space.*
The proposed amenity space at the rear is still very poor for the number of proposed dwellers and the front garden is completely destroyed. **This proposal is contrary to this element of policy H1.**
4. **Core Strategy – H5 'Housing policy for Central Manchester' incl. Rusholme.** This policy states that *Priority will be given to family housing and other high value high quality development where this can be sustained...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.*
This proposal will result in a loss of a valuable and attractive family home which some of the local families were hoping to buy to live in but could not succeed in competing with developers at the auction. **This proposal is contrary to policy H5.**
5. **Core Strategy – H11 'HMO'.** The proposal is located in the area with very high concentration of HMOs. The property has not been licensed as HMO previously. **This proposal is contrary to policy H11.**
6. **Core Strategy – Policies EN4 and EN8, Reducing CO2/ Carbon Emissions & Climate Change**
The applicant provides no evidence how the development will seek to reduce CO2 footprint/ emission. Whilst the developer might argue that rainwater harvesting and other active environmental features are not economically viable, the very nature of the development significantly reduces opportunities for passive energy efficient design. The layout provides most flat with single orientation, omitting opportunities for natural cross ventilation and simple passive design measures. This will result in overheating and poor air quality and a use of fans and chillers during summer period. A family home would not have the same issue as the internal spaces would be interconnected. The proposal does not take opportunity 'to provide linked and diverse green space to enhance natural habitats which will assist species adaptation'. Moreover, the owners have already destroyed the existing green area which was connecting all back gardens in the neighbourhood. The proposed hard surface will increase the amount of run-off water and put more pressure on the drainage system. **This proposal is contrary to policies EN4 and EN8**
7. **Core Strategy – Policy EN9 Green Infrastructure** As mentioned above, the proposal has already destroyed a link between the existing green spaces and significantly reduced a variety of local species. MCC encourages *green roofs, green walls, tree planting and other forms of*

green infrastructure to allow for the adaption to climate change in heavily urbanised areas.

The proposal includes nothing of the above. **This proposal is contrary to policy EN9**

8. **Core Strategy – Policy EN19 Waste.** The proposed management plan is based on three Eurobins and a smaller green bin (not shown on the diagrams as it wouldn't fit). The local area however is not served by large bins as evident from other apartment type developments. The proposal will result in 15 bins requirement. The area identified for bins is not shown in details but is insufficient. **This proposal does not meet requirements of Policy EN19 Waste.**
9. **Core Strategy - Policy DM1 Development Management.** This development does not have regard for a number of issues listed in DM1: *Impact on the surrounding area in terms of the scale of the proposed development. Effects on amenity, including privacy, light, noise, vibration, air quality, litter, birds, road safety and traffic generation. Adequacy of internal accommodation and external amenity space. Vehicular access and car parking. Effects relating to biodiversity, landscape. Green Infrastructure including open space, both public and private.* **This proposal is contrary to policy DM1.**

With respect to the Council's Saved UDP:

10. Citywide Development Control Policies – H2.5 'Converting Houses into Flats' and DC5 'Flats conversion'

*H2.5 Conversion of houses into flats and residential institutions such as nursing homes will only be allowed when it can be demonstrated that:- a) either off-street car parking can be provided without undue loss of amenity space around the house or it can be demonstrated that on-street parking is unlikely to create significant problems; b) the conversion will not detract from the character of the area by, for example, the removal of trees, hedges or garden walls which are important elements in the street scene. **Objective: To maintain and where necessary improve the quality of the housing stock and residential environments.***

Reason: To maintain the quality of the residential environment by limiting the loss of gardens, the increase in noise and parking problems which can be caused by the conversion of houses into flats.

FLAT CONVERSIONS DC5.1 In determining planning applications to convert property to flats, the Council will have regard to: a. the standard of accommodation for the intended occupiers of the premises; b. effects on adjoining houses as a result of noise from flats passing through party walls and affecting adjoining houses; c. adequacy of car parking, off-street car parking being normally required where practicable, and essential where there is so severe an existing on-street parking problem that unacceptable additional pressures would be created; d. general effects on the character of the neighbourhood, including the extent to which flat conversion schemes are a new or an established feature of the immediate area, avoiding the loss of front gardens and the retention of existing trees and shrubs; e. adequate private outdoor amenity space; f. the desirability of achieving easy access for all, including disabled people (as a minimum, access for disabled people will normally be required in conversions of ground floor accommodation); g. the satisfactory provision of refuse storage and collection facilities.

DC5.3 the Council will normally refuse permission for any developments in this category which: a. do not provide accommodation to the Council's current approved standards; b. are in tightly-packed residential streets where there is no scope for off-street car parking and where there is already an acknowledged problem of on-street congestion; c. involve conversion schemes without adequate private external amenity space; d. are schemes without satisfactory refuse storage and collection facilities.

This proposal is contrary to the above policies. It relies on utilising the back garden as a parking for 3 vehicles with insufficient amenity space for the number of occupants. The entire back garden area has already been cleared of all plants and greenery to be converted into a hard-paved parking area – all carried out without a permission or notification to the planning authorities. The owners have removed 12 mature trees and smaller shrubs and overgrowths which is a serious breach of planning procedures and in itself is a cause of our serious concerns. The noise and disruption from vehicles moving to the parking slots will have detrimental effect on the adjacent family homes and their quality of life due to noise and air pollution. There is no opportunity for on-street parking in the area especially considering the large numbers of spaces required. The waste strategy is still unresolved and the area proposed for the waste bins will not be sufficient for 15 bins requires to serve 5 individual apartments. The use of large Eurobins is impractical at Birch Polygon due to access issues. Other apartments are served with 3 individual bins each. **This proposal is contrary to Saved UDP H2.5 and DC5.1, DC5.3.**

- 11. Citywide Development Control Policies on ‘Residential Extensions’,** the proposal is contrary to a number of DC 1 policies, namely:
- **DC1.1 b)** – significant negative effect upon the amenity of neighbouring occupiers;
 - **DC1.2 b)** – the proposed extension will result in loss of sunlight and daylight at the neighbouring n6 Birch Polygon;
 - **DC1.3 a)** – due to extensive length over permitted limit;
 - **DC1.4** – due to inadequate distance to the party wall c 1m.

With respect to Manchester City Council’s Planning Validation Checklist (2018):

- 12. Accessible accommodation.** The proposal includes 0% of accessible accommodation v required 10%

This development is inappropriate for the area, community-destroying in its nature and is contrary to core MCC planning policies. We therefore trust that it will be refused planning permission.

If you require any further information on any of the points above, please contact us using details below.

Yours sincerely

