
Application number: 14366/FO/2025

From [REDACTED]
Date Wed 02/09/2026 16:27
To Julie Roscoe [REDACTED]
Cc David Lawless [REDACTED]
[REDACTED]

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Dear Julie,

Application number: 14366/FO/2025

I am writing on behalf of the Rusholme & Fallowfield Civic Society and local residents to **strongly object** to the proposed roof conversion at Carfax Court. The reasons for our objection are as follows:

1. Protection of Protected Species

The application lacks a mandatory, statutory Bat Survey, which represents a direct breach of Policy EN15 of the Manchester Core Strategy and the Wildlife and Countryside Act 1981. The development involves converting an old, undisturbed roof space directly adjacent to mature trees. Local residents routinely observe bats emerging and foraging at dusk. Because bats are a European Protected Species, the Council cannot legally grant planning permission until a competent, seasonally appropriate bat surveys are submitted and assessed by the Greater Manchester Ecology Unit (GMEU). Proceeding without this is a procedural and legal error.

Two distinct types of bat surveys are required upfront before the application can be legally determined:

Stage 1: A Preliminary Roost Assessment (PRA)

Stage 2: Seasonal Dusk Emergence and Dawn Re-entry Surveys

These surveys must adhere to the **Bat Conservation Trust Good Practice Guidelines**. Case law dictates that these surveys cannot be left to a planning 'condition' to be done later; they must be provided upfront to the **GMEU** before determination. As we are moving outside the peak active survey window, the council must defer or refuse this application until next summer's survey data is fully produced.

This matter was raised with the case officer last year during the initial application, yet the application has been allowed to progress without this vital information. We trust the planning department will rectify this situation as a matter of urgency. However, we remain concerned that evidence of the bat habitat may have already been removed by the applicant.

2. Harm to the Conservation Area

The application site sits within the designated Victoria Park Conservation Area. It is therefore bound by a statutory duty to preserve or enhance the historic environment under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposal to raise the existing roof level and clutter the traditional roofscape with multiple upward-facing rooflights—solely to facilitate substandard student accommodation—fails to complement the historic features of the area. This directly violates Policy EN3 of the Manchester Core Strategy and Saved Policy DC18 of the UDP. It harms, rather than preserves, the architectural integrity of the roofline and the streetscape, no street views / CGIs are provided to prove otherwise.

3. General Amenity, Overdevelopment, and Garden Overshadowing

Under Policy DM1, all developments must ensure they do not have an adverse impact on the amenity of the neighbourhood. The proposed structural alterations to the fourth-level roof space will severely overshadow the adjacent private gardens. Under Building Research Establishment (BRE) guidelines for outdoor amenity spaces, at least 50% of a garden must receive at least two hours of direct sunlight on 21 March. The applicant has provided no transient overshadowing diagrams or hour-by-hour shadow plots to prove compliance with this test. Restricting daylight and cutting off sunlight to these vital green spaces will drastically diminish their usability, ecosystem health, and the enjoyment of local residents.

4. Failure to Demonstrate Compliance with BRE Daylight Guidance (25-Degree Rule)

The application completely fails to address the impact of raising the roofline on the daylight enjoyed by the habitable windows of neighbouring properties. Under BRE guidelines, a 25-degree line must be drawn from the midpoint of the lowest habitable windows of facing properties to ensure diffuse daylight is not significantly obscured. The applicant has failed to provide any sectional drawings, elevation diagrams, or a formal Daylight and Sunlight Assessment to demonstrate compliance with this rule. Because the proposal seeks to increase the height and massing of the roof, it is highly likely to breach the 25-degree threshold, causing a noticeable loss of daylight to neighbouring homes. The Council cannot accurately assess the harm to local residential amenity under Policy DM1 without these critical technical diagrams, and permission should be refused.

5. Equality and Discrimination

The applicant implies that because these units are intended for students, a lower standard of living amenity is acceptable. This is a discriminatory approach to housing provision. Students require high-quality living environments to support intensive study. Forcing students into fourth-level, windowless, outlook-free 'boxes' directly undermines their mental health, well-being, and academic capabilities.

6. Manchester Core Strategy: Policy H12 – Student Accommodation

The proposal fails to meet the strict criteria of Policy H12 (Student Accommodation) of the Manchester Core Strategy. Policy H12 demands that student developments deliver high-quality, sustainably managed accommodation. Subdividing a fourth-level roof space into self-contained units that rely entirely on skylights represents a low-quality, exploitative design that fails to provide a positive or humane residential environment. Zero horizontal outlook for future occupiers directly contradicts the **Manchester Residential Quality Guidance**, which mandates that new homes must provide a meaningful visual connection to the outside world and a high standard of residential amenity to support tenant mental health and well-being.

7. High Risk to Student Health: The "Exam Season" Heat Trap due to Extreme Overheating via Solar Gain During Summer Months

The combination of a fourth-level roof location and top-lit skylights creates an inevitable greenhouse effect. Students heavily occupy these spaces during peak summer revision and exam periods (May to early July), precisely when solar heat gain is at its worst. Without vertical windows to allow for cross-ventilation, these rooms will become dangerously hot and uninhabitable during the most critical times of the academic year, failing basic HHSRS health and safety guidelines and conflicting with Core Strategy policies on sustainable design and climate resilience.

Without vertical windows to allow for dual-aspect cross-ventilation, daytime heat will be permanently trapped. This will cause indoor temperatures to routinely exceed 25°C during the critical summer exam period (May–July), a threshold the World Health Organisation (WHO) and HHSRS warn significantly elevates the risk of cardiovascular strain and heat stroke. Because this proposal creates an immediate, severe danger to tenant health, the development would effectively present a **statutory Category 1 Hazard** upon completion. Manchester City Council cannot legally grant planning permission for a residential layout that would fail basic statutory fitness standards and be illegal to safely occupy or rent out from day one.

The two communal areas proposed in the centre of the plan create further risk as they can be easily converted into two additional studios.

8. Fire Safety in Multi-Occupancy Layouts

High-density student accommodation carries elevated fire safety risks. Relying entirely on rooflights on the fourth level eliminates any possibility of external emergency rescue or egress via windows. This overdevelopment places vulnerable young occupiers at an unacceptable risk.

We trust the above points will be taken into consideration and that Manchester City Council will uphold its high standards regarding this application.

Best regards,



Rusholme & Fallowfield Civic Society