



Paul Butler Associates

Planning, Development & Heritage Consultants

14 September 2022

Tom Beirne
Bury Metropolitan Borough Council
Development Control,
The Planning Service,
3 Knowsley Place,
Bury,
BL9 0EJ

Our ref: 22.1706

Dear Tom

Application Reference: 68542

Proposals: Conversion of a 6 bed HMO (C4 use) to an 8 bed HMO (Sui Generis)

Location: 79 Bury New Road, Whitefield, Manchester, M45 7EEG

This letter has been prepared by Paul Butler Associates in response to the neighbour representations received during the consultation process for application 68542.

The issues raised by occupiers of neighbouring properties have been summarised in the table below, and a response to each issue has also been provided. In addition, photographic and video evidence of the parking demand, accessibility and use of Robin Lane has been compiled by the applicant. Dated photographs are appended to this letter, and video footage of an 18 tonne wagon accessing the lane and safely doing a 3 point turn, then egressing from the lane in forward gear, as well as a large car accessing and egressing from a car parking space are also enclosed.

Theme	Key Issue	Justification
Parking	Increase in parking demand arising from an additional two HMO bedrooms.	The submitted Highways Technical Note includes an analysis of forecasted parking demand resulting from the proposed development. Based on an evaluation of typical car ownership using census data for the site location, the existing HMO, and comparison with other comparable sites using TRICS data, it is estimated that the proposed development could be expected to generate an additional car parking demand of one space. One additional car would not result in any issues and would have a negligible impact.
	Lack of car parking.	The Highways Technical Note submitted in support of the application includes details of a parking survey undertaken on 22 nd February. Of the total 23 car parking spaces available along Robin Lane, there was a <i>minimum</i> of 9 spare spaces. The spare parking capacity along Robin Lane (minimum of 9 spaces) can clearly accommodate the

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		additional car parking demand that is forecast as a result of the development, as well as being able to accommodate spikes in demand such as visitors. Photo evidence provided at the appendix also demonstrates there is ample spare car parking capacity which can accommodate much more than the forecasted additional demand for one space. The proposed development will not result in any car parking issues.
	Not all spaces can be used, i.e people would not normally park outside someone else's house.	This is not relevant to the application. Similar to any highway, people are free to park in any available space on Robin Lane (providing this does not block people in who have parking in their rear gardens). Etiquette of not parking adjacent to other people's houses is a not a planning matter and should not impact the determination of this application.
	Access road is in poor condition which discourages people from parking on it.	This is not relevant to the planning application for an additional 2 HMO bedrooms. If the condition of the access road is an issue, then upgrade of the road should be considered which is a separate matter. Notwithstanding the above, the access road is considered to be in an acceptable condition (see photographs appended to this letter). The applicant also recently resurfaced the part of the access road at the south end and adjacent to the application site.
Highways Safety	Parking on Robin Lane could result in people having to reverse out onto Bury New Road.	The submitted Highways Technical Note includes vehicle tracking for a large car. This shows the swept path analysis of a large car being able to access all of the car parking spaces, alongside the ability of a large car to access, manoeuvre, and egress Robin Lane in a forward gear, without the need to encroach onto nearby bays. The tracking prepared by highways consultant Axis confirms that there would be no requirement for people to reverse onto Bury New Road, and that the access arrangements following the development would not result in any highway safety issues. The photograph and video evidence provided demonstrates that vehicles do not need to reverse out of the lane. The evidence provided also demonstrates there is ample spare car parking capacity, meaning vehicles would not need to

		reverse out if the occupancy of 79 Bury New Road was increased by 2 persons.
	Delivery vehicles not being able to manoeuvre.	The tracking within the submitted Highways Technical Note shows that vehicles would be able to access the south end of Robin Lane and turn around so that they can egress Robin Lane in forward gear, even if all spaces were occupied. A 30 tonne wagon recently delivered concrete to the site and was able to access Robin Lane (see figures 11 and 12 of the appendix). The applicant confirms this wagon egressed from the site in forward gear. Additionally, the applicant has also provided a video showing an 18 tonne wagon accessing the lane and easily turning at the south end of Robin Lane.
General	The application has already been refused at appeal.	The original application and appeal were not supported by a Highways Technical Note or advice from a Highways Consultant. This application has been supported by a Highways Note prepared by Axis which fully addresses the reason for dismissal of the appeal.
	Works to convert the property to an 8 bed have already taken place.	This is not a breach of planning regulations. There is no restriction on internal works and any external alterations, such as the installation of 2no. roof lights have been undertaken using permitted development rights.
Refuse Arrangements	The HMO will not cope with additional recycling / rubbish.	The current refuse arrangements are adequate and can accommodate an additional 2 residents. The existing HMO does not generate refuse issues, in any event an additional bin can be obtained if there is such a requirement.
	Refuse collection vehicles not being able to access of manoeuvre in the lane.	The applicant has confirmed that the refuse vehicle accesses Robin Lane, turns around at the south end and egresses in forward gear. The proposed development will not impact refuse collection arrangements and this is not considered to be a constraint to the development.
	Bins on Robin Lane obstructing parking and vehicle movement.	The layout of parking spaces along Robin Lane is shown on the tracking diagrams included in the Highways Technical Note. This clearly shows that there is space for bins to be 'put out' for collection along side space needed for parking.

This letter has sought to address the issues raised by neighbours in response to the development proposals. The responses provided in the above table demonstrates that there is no adverse impact upon highway safety resulting from the proposals.

The photographic evidence of parking demand and capacity to safely manoeuvre vehicles on Robin Lane appended to this letter, together with the enclosed video evidence of the same, also demonstrates that the increase in capacity of 79 Bury New Road by two individuals will not result in any highway issues.

Paragraph 111 of the NPPF states that “*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*” This letter, together with the submitted Highways Technical Note prepared by Axis clearly demonstrate that the proposed development would not have severe impacts on highway safety or the road network. We consider there is no reason which could substantiate refusal of the application.

Indeed, the application is associated with a host of public benefits; primarily that the development would be providing a valuable source of affordable housing in a sustainable and accessible location within an existing residential unit, and making more effective use of an existing building and land. On this basis, we respectfully request that the application is recommended for approval.

Yours sincerely

Lynsay Ewart

Lynsay Ewart BSc (Hons) MSc MRTPI
Senior Planner

Appendix: Photographic Evidence of Car Parking at the Site

Photos taken Tuesday 23rd August 2022 at circa 8.30 pm



Figure 1 : View from Robin Lane looking towards Bury New Road. Car parking easily Accommodated (photo 8.30pm on 23.08.22).



Figure 2: View from the north end of Robin Lane looking west. Car parking easily Accommodated (photo 8.30pm on 23.08.22).



Figure 3: View looking south along Robin Lane. Car parking is easily accommodated (photo 8.30pm on 23.08.22).



*Figure 4: View of south end of Robin Lane, here vehicles can turn
(photo 8.30pm on 23.08.22).*



Figure 5: View of parking outside the application site. There are a number of spare car parking spaces (photo 8.30pm on 23.08.22).



Figure 6: view showing the condition of the access road (photo 8.30pm on 23.08.22).

Photos taken Wednesday 31st August 2022 at circa 11.30am



*Figure 7: View looking south on Robin Lane. Spare car parking spaces available
(photo taken 11.30am on 31.08.22).*



*Figure 8: View looking north on Robin Lane. Spare car parking spaces available
(photo taken 11.30am on 31.08.22).*



Figure 9: View of car parking adjacent to the application site at the south of end of Robin Lane. Spare parking available (photo taken 11.30am on 31.08.22).



Figure 10: View from south end of Robin Lane looking north, showing the area for cars to turn (photo taken 11.30am on 31.08.22).



Figure 11: Concrete delivered by a 30tonne wagon which was able to access Robin Lane (photo taken 11.30am on 31.08.22).



Figure 12: Tyre marks from the concrete delivery wagon on Robin Lane, which demonstrates a large vehicle can access this route (photo taken 11.30am on 31.08.22).

Photos taken Wednesday 7th September 2022 between 4.30pm and 5.30pm



Figure 13: View of Robin Lane showing car parking in the rear gardens of some properties (photo taken 4.30pm -5.30pm on 07.09.2022).



*Figure 14: Spare parking capacity and turning space at the south end of Robin Lane
(photo taken 4.30pm -5.30pm on 07.09.2022).*



Figure 15: 18 tonne wagon travelling north on Robin Lane after tuning at the south end (photo taken 4.30pm -5.30pm on 07.09.2022).



*Figure 16: 18 tonne wagon travelling north on Robin Lane after tuning at the south end
(photo taken 4.30pm -5.30pm on 07.09.2022).*

Photos taken on Friday 9th September at circa 5pm



Figure 17: Parking capacity adjacent to the application site (photo taken 5pm on 09.09.2022).



*Figure 18: View looking west into Robin Lane from the junction with Bury New Road
(photo taken 5pm on 09.09.2022).*

Photo taken Sunday 11th September circa 9.30am



Figure 19: View looking north on Robin Lane (photo taken 9.30am on 11.09.2022)



Figure 20: Spare parking capacity adjacent to the application site (photo taken 9.30am on 11.09.2022).



Figure 21: Land available for turning at south end of Robin Lane (photo taken 9.30am on 11.09.2022)).



Figure 22: View on Robin Lane looking south (photo taken 9.30am on 11.09.2022).



Figure 23: Car parking capacity on a Sunday morning, which is likely to be the busiest time ((photo taken 9.30am on 09.09.2022)



Figure 24: Cars parked outside the application site (photo taken 9.30am on 09.09.2022)