

Submission in response to Planning Application 143777/FO/2025

Erection of six residential blocks, following demolition of existing buildings and structures, to provide a total of 212 dwellings (Use Class C3) comprising: one 10-storey building accommodating 86 apartments; four buildings of 5 to 6 storeys (including attic storeys) accommodating a total of 119 apartments; and 7 three-storey townhouses; together with ancillary communal facilities, associated access, car and cycle parking, refuse storage, landscaping, amenity space, signage, and other associated works.

Land Between Junctions Moss Lane East And Barnhill Street Princess Road
Manchester M14 4TE

This response is jointly submitted by:

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Response to MSV Reno housing development application

This response from local Councillors and community groups represents the outcome of a long and considered discussion about a very significant development. It reflects the concerns of a range of groups and the continued anxiety and anger voiced by numerous individuals. We are saddened that throughout discussions with MSV and the Council there has not been a serious recognition of the deep local concern, nor the very real impact this development will have. Some small concessions in terms of height and numbers have been granted, but nothing which significantly responds to this concern.

From the outset of discussions early in 2023 community representatives have made clear their opposition to an intensive development on this and adjoining sites, because of the specific adverse impact on current community use of this area and also the impact on the wider Moss Side community. This response to a detailed planning application gives detailed reasons for this opposition and urges that the application should be wholly rejected.

1. The partial nature of the plans for this area

The site in question has been named the Reno site by the developers, MSV housing. It is one of three sites identified in the triangle of land bounded by Princess Road, Moss Lane East, and Raby Street. Original plans presented to the community in 2023 showed intensive housing developments on all three sites. The illustration (from an MSV publication) now shows the site covered by this planning application as Phase 1, with sites 2 and 3 as “future phase”.



It is our contention that it is unacceptable in both planning terms and from a community perspective for only part of the proposals for the sites in this area to be brought forward. In our view the current proposals for Site 1 are already so damaging as to require them to be rejected, but this damage would be even more extreme if plans for all three sites were included. MSV may claim that the plans are not yet clear, but that is not acceptable. We believe approval of this application would be used in future to justify approval for similar intensive proposals on the adjacent sites (which has always been MSV's ambition as shown by previous plans).

We believe it is unacceptable for the Committee or the local community to be presented with only a partial view of plans for this sensitive and important part of Moss Side, and this alone would be grounds for rejecting the application.

2. The intensive nature of the proposed development

Manchester Core Strategy states:

High density developments (over 75 units per hectare) are appropriate in both the City Centre and parts of the Regional Centre given the accessible location. Within the City Centre there will be a presumption towards high density housing development.

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. Outside the Inner Areas the emphasis will be on increasing the availability of family housing therefore lower densities may be appropriate.

Moss Side is within the Central planning area. This development is for 212 units on a 0.61 hectare site. This is a unit density of 347.5 per hectare. The proposed development, therefore, is not only high density, but extraordinarily high density, around 463% of the threshold intensity figure of 75 and markedly above the “around 40 units” quoted in the Core Strategy for developments in the Central area.

Using MSV’s figures for number of people per unit (see the Accommodation Schedule) shows that anticipated occupation is 651 people. This could be marginally reduced if the M43 units had one fewer person. 651 people on a 0.61 hectare site is a population density of 1067.

Such densities may be appropriate in the city centre. But they are not appropriate as housing provision for the majority of Manchester’s population, nor we believe would be considered acceptable in other wards in the city. Although the Core Strategy does indicate the need to use well located brownfield sites, nowhere does it suggest that the use of such sites outside the city centre warrants such extraordinary levels of intensity, and we doubt whether such a suggestion would have met with approval when the strategy was produced.

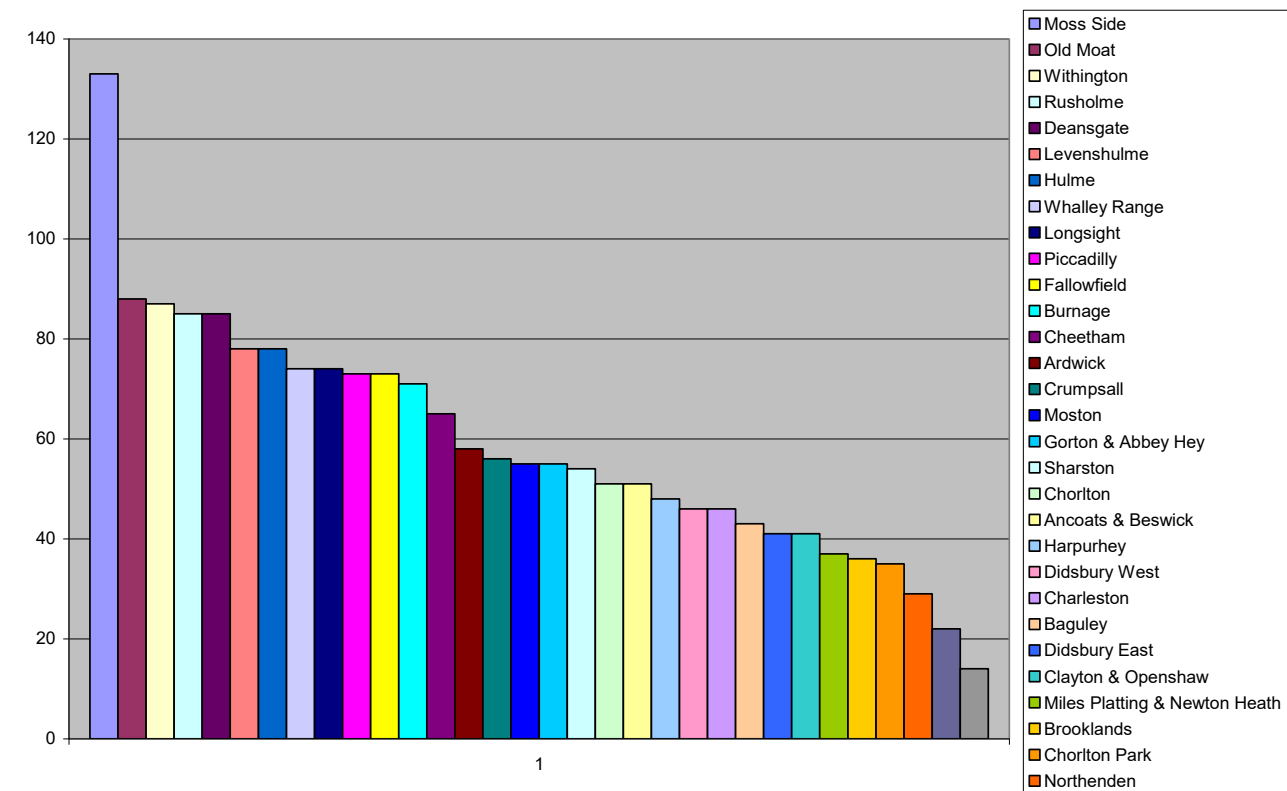
We note, too, the expectation in the Core Strategy that in other areas where developments include family housing densities lower than 40 are likely to be appropriate. This is in sharp contrast to the extraordinary density of this scheme, which includes family dwellings.

The Planning Statement notes that the population of Moss Side is expected to grow (from “around 25,000” in 2025 to “approximately 27,500” in 2031). Council and other documents over the years have documented the past and anticipated growth of Moss Side, without considering whether this is beneficial or appropriate. Past housing developments have contributed to this, often bringing in new people without any significant impact on housing need/overcrowding. At the last electoral boundary review part of Moss Side was moved to Whalley Range to take account of the high growth in numbers in the ward due to the Bus Depot development.

As a gateway ward for many communities new to Manchester, Moss Side has always had problems with accommodating the many people who want to live here. This leads to housing demand, but it cannot be assumed that all the housing demand generated in Moss Side must be met in Moss Side whatever the outcome in terms of density, quality and community impact.

The high densities associated with this development are particularly inappropriate for Moss Side, which is already by far the most densely populated ward in Manchester. Early in the process local residents informed planners about the level of density, which by Office for National Statistics (ONS) figures was 126 people per hectare in 2020. Latest figures are for 2022 and

have risen to 133. The nearest ward has 88 people per hectare, and the Manchester average is 49. Every other ward in the city would have to increase its population by at least half to equal Moss Side's current level of density, and some would have to double in population.



ONS ranking of English districts shows the authorities with the highest density are Tower Hamlets (164), Islington (148), Hackney (137) and Kensington and Chelsea (120). Moss Side does not appear in the table as it is a ward not an authority, but its level of density places it on a level between the third and fourth most densely populated places nationally.

Approvals given by Planning Committee in 2023 for a 7-9 storey student block on Moss Lane East for 261 people on 0.19 hectares (unit and population density 1373 per hectare) and in 2024 for a 42 unit development on a 0.09 hectare site on Wilmslow Road (unit density of 467 per hectare) will contribute to Moss Side’s population density figures going even higher in coming years. Based solely on the number of bedrooms in these two developments this equates to a rise in population of 333. Added to the 651 projected numbers in this current MSV application this amounts to a rise of 984 people. Using MCC Intelligence Hub figures for the 2022 Moss Side population (21,827) this would mean a rise of 4.5% from these developments alone, to 22,811. It would also raise the population density score to 139 per hectare (a rise of 6 on current score) and further increase the gap between Moss Side and all other wards.

We note, too, a further planning application for an intensive development on Moss Lane East: a 132 unit student accommodation scheme on a 0.16 hectare site, replacing a smaller set of apartments and likely to increase the population by at least a further 100 if current tenants are discounted. The density of this proposed development is 625 per hectare.

Moss Side has been growing proportionately more dense over decades. This growth is almost entirely due to new developments and other housing issues (growth in HMOs for example) in that part of the ward situated between Princess Road and Oxford Road. Little has changed on

the Alexandra Park Estate, which clearly and visibly has a much lower density. The level of overcrowding, therefore, is concentrated in the eastern part of the ward, where this proposed development would take place.

Local residents consistently complain about how the area is becoming more and more crowded, but feel that their genuine concerns have been disregarded and downplayed, including in the piecemeal consultation which has taken place through the Steering Group set up by MSV. The very detailed figures provided above give quantifiable and verifiable information from official sources (mainly via MCC's own website) which give substance to this serious concern.

We contend that it cannot be appropriate in planning terms for approval to be given to a development which would seriously and knowingly exacerbate the significant gap between living conditions in Moss Side and in all the other wards of the city; is at extreme variance with Core Strategy density norms; and is inconsistent with the Council's policies on equality and fairness, and indeed with judgements on what is morally acceptable.

3. Rationale for the development

In papers provided by MSV/MCC it was stated that the "Housing Register is disproportionately weighted towards families in Moss Side." Community members of the Steering Group were told the scheme was required because "we have 100 families in Moss Side needing bigger houses". The Executive Member for Housing also stated publicly that "this new housing will be designed for, and give priority to, local families through a lettings policy that prioritises local people and residents for the new affordable housing."

During the consultation process Steering Group members consistently asked MSV for information on proposed tenure. This was only finally available through a report from the Housing Director to local Councillors. This showed the majority of units were one and two bed apartments, and adjustments to slightly reduce density had significantly reduced family housing and only marginally reduced smaller apartments. The community members of the Steering Group voted unanimously against this scheme as not meeting local need, being far too big, not prioritising family houses, and encouraging yet more people into an over-crowded area.

The 212 units in this application are made up as follows: 31 family dwellings (14.6%); 106 two-bed apartments (50.0%); and 75 one-bed apartments (35.4%). 28 of the apartments are deemed to be for older people to "rightsize". The scheme is clearly not, as promised, "designed for... local families".

In the Housing Director's report it specifically said that "to achieve the highest output for the city, densities appropriate to well-connected locations are higher than that of traditional suburban estates", and further later stated that "the delivery strategy consolidates all ownership to achieve the highest outputs for the City".

In its initial description of the project MSV said that the intention is to "regenerate this area of Moss Side and typically successful regeneration of an area does work best when there is the creation of a new and diverse and mixed community so there will be an encouragement of new people to move to Moss Side as well as to the new homes."

These statements make clear that whilst providing some housing for Moss Side families is a small part of the development, a key driver has been and continues to be delivering a substantial

number towards the city's targets, with a clear recognition that this involves bringing more people into the area.

We acknowledge that this proposal does provide a small number units for families, but will demonstrate later in this response that the intensive nature of this development has severely compromised the quality of that family accommodation, which is significantly at variance with family housing elsewhere in the city.

4. Parking

From the outset of discussions in 2023 community representatives made clear that this area is notorious for parking problems. This relates in particular to three key community institutions in the immediate area: the Church of God of Prophecy, Powerhouse Youth and Community Centre, and the West Indian Sports and Social Club.

The Church of God of Prophecy has a regular congregation for worship of around 150 people, and only a small car park. In addition to Sunday worship it hosts weddings, dedications and baptisms. It is also extremely well used by other churches in the area as a place where large funerals, particularly West Indian funerals, are held. The West Indian community is very supportive of its members, and it is usual for the church to be packed, with standing room only. Attendances are frequently in the hundreds. On occasion it uses an overflow room (most notably recently for the funeral of a young man which attracted some 500 people). It is well known locally that when funerals are taking place at the church (which can be as much as three times a week) then parking will be difficult if not impossible. (See pictorial evidence in the Appendix – this evidence was provided to MSV in August 2023.)

The West Indian Sports and Social Club is a favoured venue for the subsequent funeral wake, again associated with large amounts of parking. It hosts a range of social functions, and is used particularly at weekends for music. It is an established and important part of the community and is widely used. It has a car park, but for big events users also need to park on the adjacent streets.

The Powerhouse is not only a youth centre and young people's library, but also a valued community hub, hosting a wide range of organisations which provide services on a sessional basis in the centre (this includes Emerge NHS Emotional Needs Service, The Social Communication Pathway, Thrive in Education Manchester, The Housing Project, GM Immigration Aid Unit, Moss Side Homeless Prevention Hub, Neighbourhood Health Champions, Caribbean and African Health Network, SEND services and others). It has a sports hall which is the only venue in Moss Side capable of hosting large consultations, events, jobs fairs, etc. It is the venue for the Revelation Church on a Sunday. It, too, has only a very small car park, and users habitually park on Raby Street. The general problems of parking in this area significantly affect its work; providers and users often have difficulty parking, and it is a problem for organisations wanting to participate in jobs fairs, etc. because they need parking very close to the venue for their stands. On at least one occasion an exhibitor could not participate due to lack of parking. If parking problems were exacerbated then some important support services might find it difficult or impossible to continue to operate from the Powerhouse, and this local access to their valuable services would be lost.

Also within this area is a triangle of land between Raby Street, Westwood Street, and Moss Lane East. This site includes a discount furniture store, and the Brotherhood of the Star and Garter, a black-led church whose members park on local streets.

A residents' parking scheme on the eastern side of the ward was introduced to help residents there who were affected by large amounts of commuter parking. As a result there has been displacement westwards to the streets off Broadfield Road near to the Church of God of Prophecy, with a negative effect on their residents, and it is notable that there is now significant apparently weekday commuter parking on Moss Lane East near the site and stretching to Upper Lloyd Street. Raby Street and Barnhill Street are also affected. Residents of the part of Barnhill Street which stretches south from the site complain that parking is one of their most significant problems.

The development has 63 parking spaces, meeting the requirement for 30% parking. 5 of these are disabled parking spaces, and 7 are specifically for the houses on Barnhill Street. If 5 of the family apartments actually have disabled residents then this means there are 51 spaces which are for general use for the remaining 200 units, roughly 4 units per parking space. Parking will also be needed for visitors, tradespeople, and delivery drivers (Manchester's Development Report 20-21 noted "more shopping taking place online").

We accept and welcome that residents will be encouraged to use public transport and cycle spaces are being provided. However, whilst living close to the city means that journeys into town are most easily done by bus, many people own cars in order to do the many things in life which are not easily done by bus or cycle. This includes, for example, getting the weekly shop, holidays or days out in the country, visiting friends and relatives. For some a car is necessary for their employment, or for getting to work. This means needing somewhere to park the car, even if it is not required for daily use. The residential streets of Moss Side are testimony to the fact that local residents feel the need for their own transport, even though they live relatively close to the city centre and use buses for local journeys.

The gap in provision between units and parking spaces is 149. If only a third of this number required regular car parking spaces this would be a shortfall of 50 spaces, all of which would be trying to park on adjacent streets. Local community use of the western side of Barnhill Street for parking during big events would also now not be possible for a large part of its length due to the need to access the off-street parking associated with each of the seven houses. It is clear that the potential conflict between the parking requirements of the development and those of local community assets would be enormous.

We note that the Clockworks development immediately to the south has 58 parking spaces for 105 two-bed apartments, which is 55% provision. It is clear that in every aspect of this MSV development the intention is to squeeze as many units as possible into this very small space, regardless of the impact on the local community. (In this case in terms of parking and access to local facilities, but also, as will be shown, in relation to the quality of the accommodation.)

We note with concern that the Transport Statement submitted by the developers did not mention the current community use of the area, nor the parking problems associated with key events. It would appear that the consultants had not been informed of these issues, although they had been raised consistently by the local community and MSV had been well informed of these concerns. The consultants' sole evidence on parking need was a picture of Barnhill Street with no cars on it. It is the nature of the community use that there will be times when there is less parking, but at many other times the current parking requirements exceed current provision (see pictures in the Appendix).

We are concerned and surprised by the statement about parking in the Transport Statement that “priority will be allocated to specific units – prospective occupiers will be aware of parking availability and would decide whether to rent such a property”. They justify this by saying “existing on-street parking is available in the vicinity of the site to cater for visitors, delivery drop-offs, etc.” This seems an extraordinary, complicated, restrictive and potentially discriminatory suggestion which would tend to exacerbate the likely impact on the locality, and does not recognise current community use. Residents cannot be prevented from owning a car, and if they are not one of the “lucky” ones then they would always have to park on local streets.

There is already a significant problem with parking in this area, associated with the various uses of the Church of God of Prophecy, the West Indian Sports and Social Club, and the Powerhouse Youth and Community Hub. Further parking pressure would threaten the essential services and events they provide. There is simply not room on local roads to accommodate the potential parking requirements of the 70% of units for which there is no onsite provision, nor associated parking requirements of tradespeople, delivery drivers, and visitors.

5. The cultural significance of this area

Manchester’s Building Back Fairer Framework says:

“Participants told us that social connections are essential to good health. A sense of belonging enables people to feel safe, both physically and emotionally. These connections are developed and maintained in a variety of different spaces but religious buildings, specialist retail spaces, green and outdoor spaces and Minority Ethnic-led community and voluntary organisations were considered to be especially important spaces of social infrastructure. These must be safeguarded and supported. Local assets need to be accessible to local people.”

Manchester’s Housing Strategy says:

Addressing inequalities and creating neighbourhoods is not just about buildings homes. It is about place-making and recognising community heritage is integral to this. For example, the redevelopment of the former Reno nightclub site in Moss Side will be guided by the needs of the current community whilst at the same time celebrating the history and culture of the many black communities who have made Moss Side their home.

This particular part of Moss Side is of great significance to the West Indian Community, with institutions which reflect the fact that many West Indian families made their home in Moss Side when they came to Manchester. The institutions which served them remain and are as important now as then.

The Church of God of Prophecy, a black-led church, has operated from the church building next to the Powerhouse since 1968. In addition to services of various kinds (already outlined) it has provided a lunch club four days a week since the 1980s, and until recently had a weekly food bank (temporarily suspended due to building issues). It is, along with the West Indian Sports and Social Club, an integral part of the sense the West Indian Community has that this part of Moss Side is not only a key part of their history but remains a special place to this day.

The West Indian Sports and Social Club dates back to 1953, having started on Darcy Street before moving to Westwood Street. It is the only surviving organisation from a range of organisations set up to meet the needs of the West Indian community in Moss Side. The current building dates from 1983, and is widely used for a range of different events. Commonly

referred to simply as “Westwood Street” it is a significant place where the community comes to mourn and to celebrate.

MSV decided that the Reno nightclub was the important cultural feature of this area, even though it has not only been closed but the site actually buried for a very long time. They proposed that they should honour the community by writing the word RENO on the side of a tower block. Reference to the West Indian Sports and Social Club was in relation solely to noise mitigation. This was a major misunderstanding. Community members made clear the importance of WISSC, which was threatened by intensive development all around it.

Parking issues are important. However, the community has also always been extremely concerned about the fact that residential development close to the club could threaten its future. The club generates considerable noise at weekends and on some evenings. Future residents could use noise complaints to threaten the club’s licence. The situation of the Night and Day Club in the Northern Quarter is evidence that this is a very valid threat. Agreement to a large number of housing units close to the club would substantially increase this threat. In past years assurances have been given by the Council that it will be protected as a key community venue.

The Noise Assessment report includes an assessment of the noise generated by WISSC. Since this report also includes assessments of all noise on the site, this will be commented on later in this response.

The Council and MSV have acknowledged that WISSC needs support, and MSV have offered a small amount of funding and the Council has worked on issues with the lease. This is much welcomed by the club. But there has been no acknowledgement of how central the club and the church are in the life of the West Indian community, nor how disrespectful it feels when the great anxiety and concern rightly felt by the community is downplayed and disregarded.

The Windrush generation experienced much hostility and racism when they first came to Manchester. They and their descendants have made enormous contributions to the city’s economic and social life. Subsequently the “Windrush scandal” affected many West Indian people in this city – another sense of betrayal. The Reno scheme is disrespectful to the West Indian citizens of Manchester and beyond, and is felt as such.

We believe that the statement that “Minority Ethnic-led community and voluntary organisations were considered to be especially important spaces of social infrastructure. These must be safeguarded and supported” has not been honoured in this application, and is another and important reason to reject the application.

6. Quality of accommodation on offer

Our comments are set within the context of the following quotes from the Core Strategy:

4 Core Strategy Vision

4.1 By 2027 Manchester will be a City with neighbourhoods where people choose to live all their lives because they offer a wide range of quality housing and an attractive environment where locally distinctive character is conserved and enhanced.

...a City defined by excellence in urban design and environmental quality, where its distinctive historic environment is understood, valued, cared for and its potential fully realised.

S03. Housing

Provide for a significant increase in high quality housing provision at sustainable locations

throughout the City, to both address demographic needs and to support economic growth. The emphasis will be on providing a good range of high quality housing, (in terms of size, type, tenure, accessibility and price) including affordable housing across the City; to create sustainable lifetime neighbourhoods with high quality environments, good local facilities and with easy access to employment opportunities.

It is our contention that this development neither provides “high quality housing” nor an “attractive” or “high quality environment”.



6.a Environment

The site is bounded by Princess Road on the west and Moss Lane East to the north. Princess Road is a major highway into the city, and Moss Lane East is a significant east/west highway. The eastern side of the site is bounded by Barnhill Street, and the south by Raby Street. The design has buildings close to the pavements on every side, with car parking spaces in the middle. It is dominated by a ten-storey block, with subsequent blocks declining in size. It is effectively a set of mainly high buildings surrounding car parking spaces.

In relation to the windows looking outward from the development: the outlook for windows facing the north is a main road and the Heineken brewery (although this is to some extent masked by trees); to the west is the two-lane Princess Road dual carriageway and beyond a commercial unit and the Alexandra Park Estate; to the south is the Clockworks development; and to the east Barnhill Street, with beyond a derelict area and the West Indian Sports and Social Club. Inward facing windows will overlook the car park and (crucially) other buildings and the minimal private space available to some dwellings. It is not an attractive environment.

The more detailed site plan shows there is a small triangular planted area behind the northern block, some trees are shown in front of the houses on Barnhill Street, some small trees/shrubs alongside the western parking spaces, and some narrow grassed/planted areas along the other perimeters. It is also intended to have some roof planting. The height of the blocks will mean that the inner area is likely to have periods of significant shade.

There is no analysis in the application of the impact of the height of the blocks on dwellings within the complex. The Daylight and Sunlight report looks solely at the impact on neighbouring properties, of which the only relevant one is the Clockworks. The assessment states that properties on the north side of the Clockworks would “experience some reductions which exceed the default BRE guidelines” but argued that in order to allow a new development this was acceptable. The Clockworks is situated some 17 metres from Block E. Within the development, Blocks C and D are some 14 metres from the edge of the balconies of the houses

in Block F. This indicates that levels of daylight for these balconies and house windows will be affected to some degree.

The noise assessment report is also of relevance in relation to the quality of the environment (see later).

6.b The nature of the housing

The distance between Barnhill Street (top of plan below) and Princess Road (bottom) is 49 metres. This compares with 47.25 metres from, for example, the southern side of Haydn Avenue and the northern side of Ruskin Avenue (two traditional terraced streets in Moss Side). This gives a sense of scale. This whole development is barely wider than two terraced rows of houses with yards and an alleyway between them.



Block F is 7 “traditional houses” for families. All the other Blocks are made up of apartments. On the ground floor 12 are designated for families (those in orange and lightish blue) with 5 one-bed apartments fitted in. The yellow areas are for the necessary infrastructure for such an intensive development, eg plant, bin stores, post room, etc. The white areas are access areas.

In considering the family housing offer in this development, we do so in the context of principles laid out in the Guide to Development in Manchester Supplementary Planning Document and Planning Guidance.

10.4 Developments should provide a satisfactory internal layout which makes the best use of the space available - for example, avoiding the creation of unnecessary circulation space or the provision of inner rooms. Designers should seek to ensure that spaces are well lit and ventilated naturally. A high quality of sound insulation will be required to ensure that residential amenity is protected, whatever the housing type.

10.9 All residents should enjoy useable private amenity space wherever they choose to live in the City. All new developments should be designed to provide on-site amenity space which is fit for purpose and which is informed by, and relates to, the character of the area. Simply this means the provision of gardens that perform well as multi-functional space. Gardens are valuable within any development by contributing the following:

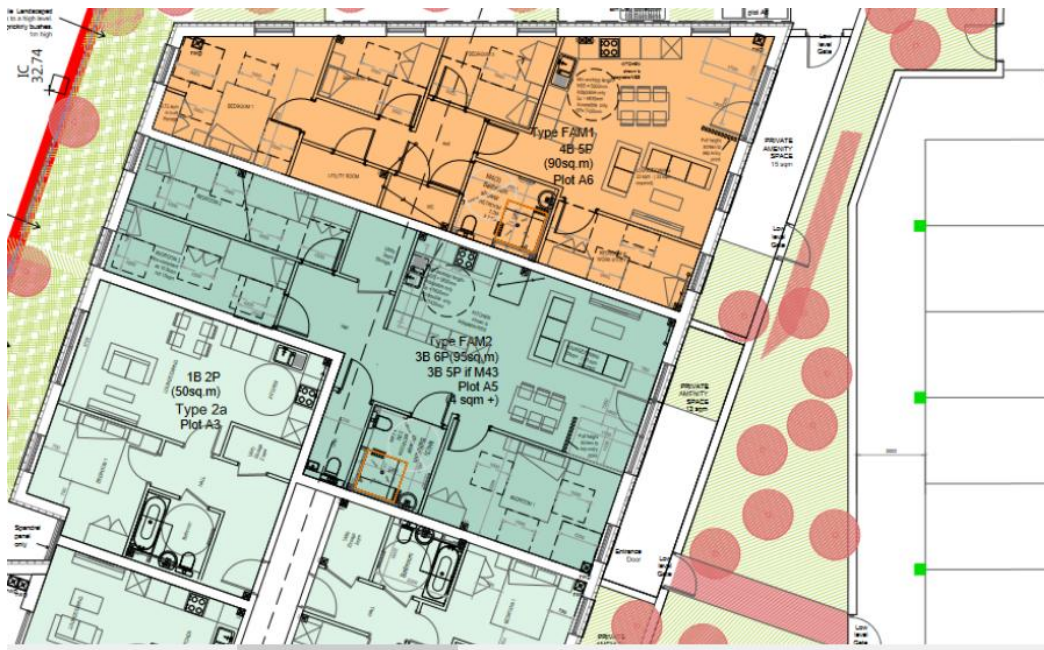
A safe play area for children

Additional storage outside the house

The provision of outside drying area for clothes which additionally assists the environmental sustainability of a development
Space in which to relax which helps the overall sense of well-being
An increased amount of planting which enhances the quality of the natural environment
The space to provide home grown food which benefits the health of the local community

Throughout the consultation process community members have emphasised the importance of private outdoor space for families, a feature which did not appear at all in the original plans. Subsequently community members were told that the final scheme includes 30 square metres “private amenity space” for every ground floor family dwelling, plus “their own front door”.

The very limited size of the site has led to a scheme which prioritises creating as many units as possible within the space. Thus the orange unit in the top left-hand corner (known as Family 1 and shown in detail below, part of Block A), which is a 4 bed 5 person property, has most of the rooms with a wall at an angle to the front and back walls, creating acute (probably unusable) corners in three of the bedrooms and the communal living area. This design is clearly simply a response to the shape of the site.

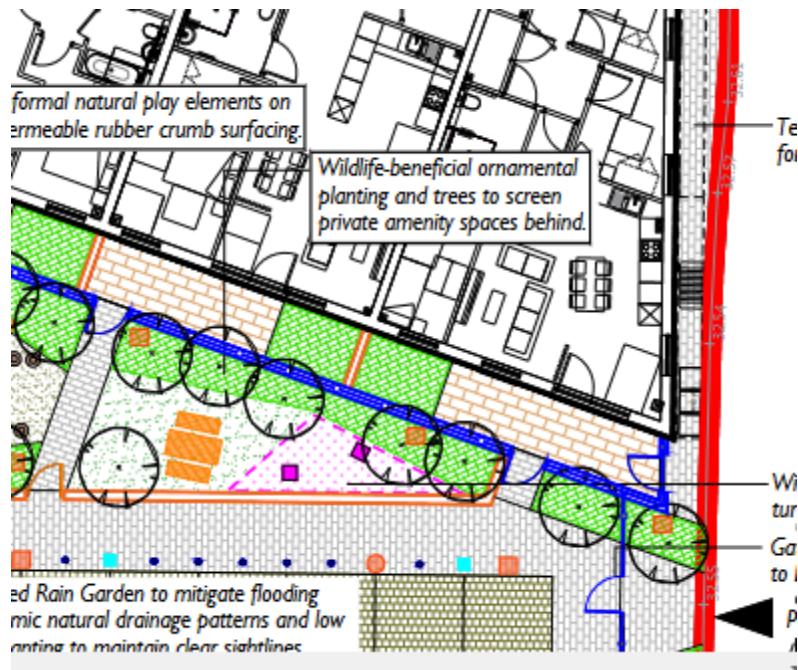


Family 1 is on the corner of Barnhill Street and Moss Lane East. Despite having windows on three sides there is no natural light for internal areas. There is just one combined toilet/bathroom for 5 people. *[The Technical Housing Standards say Gross Internal Area for one storey dwellings should include enough space for 1 bathroom and 1 additional WC (or shower room) in dwellings with 5 or more bed spaces.]*

There is no access directly from a road. Traditionally a front door gives access from the road, but in this case sole access is via the “private amenity area” running along the right hand side, close to a general amenity area. This space includes bin storage and is not even as wide as one parking space. This space can only be accessed by a gate directly off Barnhill Street. This means that if the family parks in one of the communal parking spaces they will have to leave the site by the northern vehicular entrance on Barnhill Street and walk northwards to their

pedestrian gate. Given that this would make unloading the family's weekly shop difficult, they would probably try to park near their property on Barnhill Street. This means the parking provided within the scheme does not meet their specific requirements.

The small "private amenity space" is clearly much smaller than the "30 square metres" of private amenity space for all ground-floor family dwellings promised by MSV to Steering Group members. It is difficult to see what real use this family of 5 people could make of this space, especially if, as the diagram suggests, there is a tree growing in one corner. As the diagram below shows, it will also be bordered by trees "to screen the private amenity spaces behind". The narrowness of the space compared to the parking spaces below is evident, and any trees planted alongside the space would overshadow the little space there is.

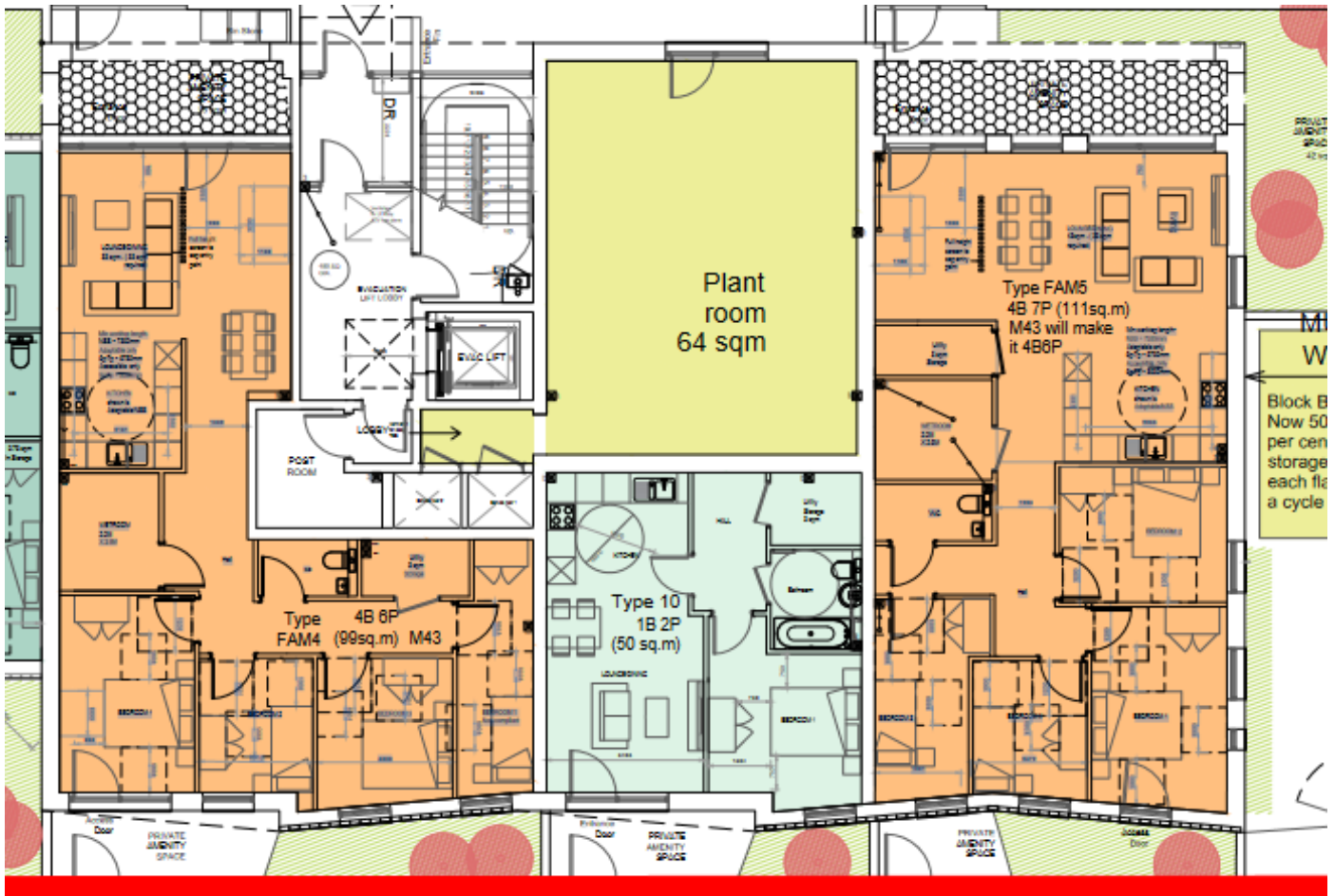


The blue dwelling next to Family 1 is Family 2, a three-bed 6 person apartment. It has two small bedroom windows at the front on Moss Lane. At the back where it faces the communal grassed area and the parking spaces beyond it has one large window for the communal living area and one small bedroom window. Like Family 1 its sole access is directly into the open plan living area from the "private amenity space". As with Family 1 this amenity space is narrower than a parking space. It, too, would be affected by the adjacent tree planting. In this case this is even more consequential, since the main source of light within the dwelling is from the two windows which overlook the amenity space.

This amenity space is sandwiched between the spaces of Family 1 and a neighbouring two-bed apartment. To reach the only access door to the property on foot (eg after getting off a bus) family members would have to access the site from Barnhill Street through a pedestrian gate (situated near the top right hand corner of the diagram) which leads to a path behind parking spaces to small gate in the communal amenity space, which then has to be crossed on a path to a gate into Family 2's amenity space (the path is shown in pink in the bottom right hand corner). Or undertake a similar manoeuvre from the entrance between Blocks B and C.

There are ten further family apartments on the ground floor. Because they are located in blocks, six of these ten family apartments only have windows front and back. The four

exceptions are those where the dwelling is at the end of the block and adjacent to either a road or the pedestrian access to the site from Princess Road. This means that for six of these dwellings there is no natural light source in the middle of the dwelling, where toilets, bathrooms, etc. are located, and it is unclear what ventilation there might be. To enable light from the lounge/kitchen area to reach the middle of these dwellings the various layouts show no door closing off this area, so any noise generated here will be more widely heard within the dwelling. In all cases areas such as bathrooms and toilets have no windows.



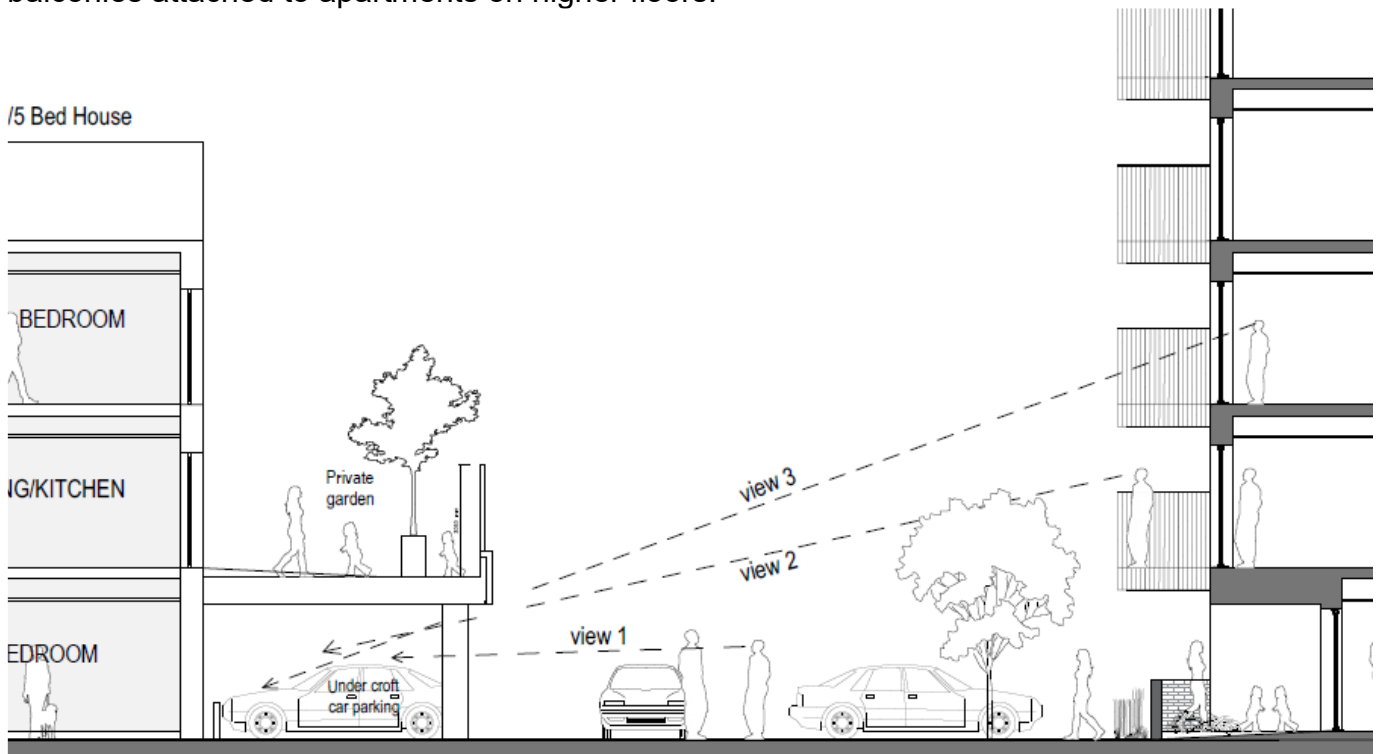
All of the ground floor family apartments have their open plan living area facing onto the parking area, with varying amounts of private outdoor space. Bedrooms are situated facing the road. The diagram above of part of the ground floor of Block B shows what is a generally common layout for all these dwellings, though they may differ slightly in shape due to where they are situated (for example the dwelling on the left is shaped to take account of the post room).

All of the family apartments have access directly into the open plan living area through a “private amenity space” accessed from the parking area by a gate. All family apartments on Princess Road and Raby Street also have an “access door” in a bedroom, which leads outside into a “private amenity space” which MSV has subsequently described as “a buffer zone for the buildings bedroom windows that are set back from the public pavement” and they claim is not intended to be used for access to and from Princess Road, but to enable tenants to access and enjoy this “amenity space”. However, the provision not only of this door but also a gate from the “amenity space” onto the road means this bedroom door is likely to be used by tenants for pedestrian access to and from the road.

We consider this extraordinary and unacceptable, and clearly not “high quality design”.

Notably, all access to all the ground floor family dwellings is through publicly accessible “private amenity space”, ie space which has a gate onto a public area and opened from that area. Along Princess Road these amenity spaces are simply a small access area, and not suitable for or capable of being used by a family as an amenity space. This is analogous to small frontages giving access to houses on terraced streets, for example. The spaces accessed from the parking area are bigger (though the space for the left hand dwelling – marked as 20 sqm - is markedly smaller than the area available to the right hand dwelling). However they are not “private” in the way that gardens and yards are traditionally only accessed from within the property and where any external gate is operated from within the property. This would significantly affect the degree of safety of children using these areas, of storage, and indeed of privacy. Notably the amount of “private amenity space” is not determined by either adherence to particular standards or by equity, but by the particular layout of the site and the width of the communal living space.

These “private amenity spaces” are not only small and situated next to a large parking area, but their access to light/sunlight is likely to be affected by the fact that they are situated under the balconies attached to apartments on higher floors.



As the diagram shows on the right, the narrow “private amenity space” is directly under and not even as wide as a balcony. This will affect the amount of light available, particularly since there is also an intent to plant trees in the parking space, thus restricting light even further. **Not only does this affect the amenity space, but since the windows in the communal living space need to provide light into internal spaces which have no windows, this suggests that internal light levels are likely to be poor.**

This diagram was produced by MSV to show the way in which the privacy of the “private amenity space” of the houses in Block F would be affected. It is notable that it only includes view-lines from the first and second floor, whilst it is the upper floors which will have clear views onto the balconies.

There are twelve family apartments not on the ground floor. There are three 3-bed 4 person apartments, one each on the second, third, and fifth floors. There are four 3-bed 5-person apartments, one each on the first, second, third, and fourth floors. There are five 3-bed 6-person apartments, one each on the first, sixth, seventh, eighth, and ninth floors.

The issues associated with the ground floor dwellings in terms of lack of windows also apply here, with inner areas and toilets/bathrooms etc. all having no natural light and ventilation. A small number have one 5.5 sqm balcony.

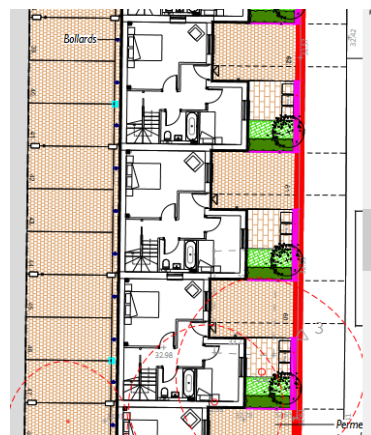
This means that of the 31 family dwellings within this development, 12 (38.7%) have no ground floor access or private amenity space. These higher dwellings are intermingled with smaller apartments in different blocks, with no sense of community. There are significant challenges in having to access the dwelling: first (presumably) by an entry code to the block, then in a lift, and only then into the dwelling. Unloading the family's weekly shop might mean doing this in several loads. How safe would it be for children returning from school having to use a lift alone in a block with a wide range of different tenants? Is this a suitable environment for a family?

These non-ground floor family dwellings fall far short of the standard for family housing the Council promotes, and are significantly inferior to family housing developments across the city.

The remaining family dwellings are seven "traditional family houses" which were added into the original design because of local complaints about the lack of actual houses.



The design was originally for apartment blocks on the north, west and south side of the site, with parking situated in the space to the east (as shown left). Houses were then added on the eastern boundary of the site. However, this threatened to compromise the provision of parking. In order to protect the parking the houses are shown on a very small footprint in the white space adjacent to the road. This leaves no room for any private amenity space.

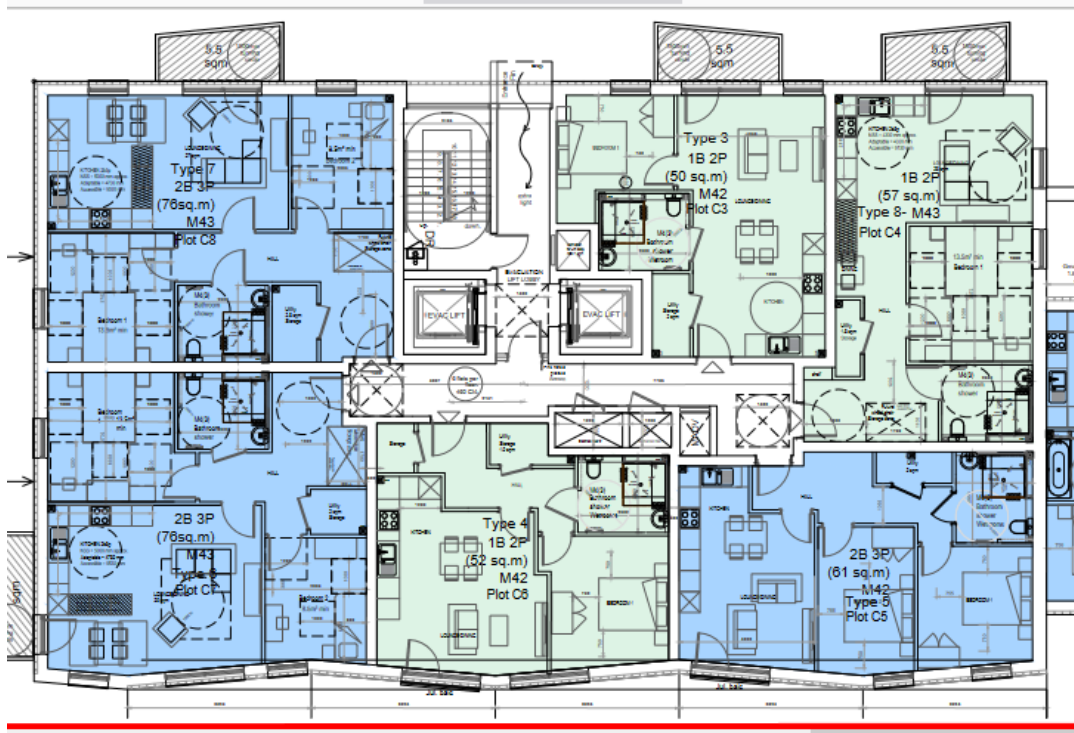


In order to provide “private amenity space” each house has a balcony situated over the parking spaces. This leads to the open plan living space having to be situated on the first floor in order to give access onto the balcony. The layout of each house is: two bedrooms and a combined toilet/bathroom on the ground floor (as shown above); an open plan living area on the first floor; two or three bedrooms and toilet/bathroom on the second floor. This means that because the communal area is on the first floor parents in these “traditional” houses will have to sleep separated from and out of earshot of some of their children.

We consider this unacceptable, not good design, and clearly solely determined by the desire to squeeze as much as possible into this small site.

Decades ago Manchester City Council resolved to no longer house families in tower blocks. It has an admirable record in building good family houses around the city. In assessing whether this development is high quality we would expect it to reach similar standards for family housing in the numerous other developments around the city, namely houses and not apartments, with adequate private outdoor space and an attractive environment.

There are 28 apartments designated for “rightsizing”, allowing older people occupying family homes to move into smaller age-appropriate dwellings. The overall plan shows Block C as designated for older people. Information from MSV to Councillors and Steering Group members showed 15 one-bed and 13 two-bed apartments. As the ground floor of Block C is taken up by family apartments, all these apartments are on the floors above.



The diagram shows the layout of Floor 1 in Block C, and there are identical layouts on Floors 2, 3 and 4. They show six apartments: three 1-bed 2-people and three 2-bed 3-people. As “rightsizing” is intended for elderly people it is not clear why there are 3-people apartments. Whilst an elderly single person or couple might like to have 2 bedrooms so they can put up guests, there seems no reason for them to require a 3-person apartment. It is clear, however,

that these larger apartments are required in order to fit into the block structure. There is a concern that this designation might lead to higher rent than a 2-bed 2-person apartment.

Floor 5 has a different layout: there are three 1-bed 2-person apartments and one 2-bed 4-person apartment, making a total of 28 apartments in all, with a similar query about the 4-person requirement. On this floor there is a small 30 square metre residents' lounge and access to a roof terrace. All the apartments facing the courtyard (except on the 5th floor) have 5.5 square metre balconies.

This older persons' accommodation meets basic requirements, such as a specific number of apartments (although with a query about the inclusion of 3 and 4 person accommodation, possibly leading in future to use other than by older people) and a small lounge, plus access to a roof terrace. However, it has no specifically attractive features which would persuade an older person to relocate here. Apart from the small lounge, and the fact there are two lifts rather than one, there is no distinctive quality about this block which makes it attractive.

This compares unfavourably with other recent older person's accommodation in Manchester, such as that provided on the former Chorlton Baths site, for example, which has dedicated buildings in landscaped gardens.



"Rightsizing" is driven at least as much, if not more, by policy makers who want to free up homes which are deemed to be under-occupied. This means encouraging older people to leave the homes they may have lived in all their adult lives, which are associated with important memories, in a familiar environment, with known neighbours, and where they feel comfortable. Grants are to be provided to encourage people to move. For such a strategy to be successful then the accommodation on offer should be attractive and feel safe. ***We do not believe that Block C offers such an environment, nor that older people in Moss Side should be offered facilities which are not comparable with those offered in other areas.***

7. Noise

The Noise Assessment report looked at the main sources of noise: West Indian Sports and Social Club, Heineken brewery, and Princess Road. It is a detailed report giving very specific noise levels in different places at different times from different sources.

"The facades facing onto Princess Road/Moss Lane East would represent the most significant risk in terms of the adverse impact. These elevations possess an elevated risk of overheating requiring enhanced ventilations which would normally be offered by opening windows. The noise risk assessment relying on opening windows would result in significant noise intrusion, thus disrupting normal sleep... The overall design of the background and purge ventilation for the Princess Road and Moss Lane East elevations has been assessed with the assumption that

windows on (all floor levels) of these elevations will not normally be open owing to the elevated levels of noise present.”

Noise mitigation is to be addressed by glazing and wall thickness requirements, but noise levels are still such in relation to these roads that windows should never be opened. In relation to noise from WISSC it is suggested that the requirement to keep windows closed would only apply when the club was in operation. Because an inability to open windows affects ventilation, “ventilation on worst affected elevations shall be via boosted mechanical ventilation”.

Since most of this development is situated on Princess Road and Moss Lane East, this means that most of the dwellings will never be able to open windows, and must rely on mechanical ventilation (increasing energy use and costs). This will also apply to the houses on Barnhill Street when WISSC is in operation.

We consider this unacceptable. Residents who reasonably want to open their windows, eg on a summer evening, could presumably choose to do so. They could argue in a licensing situation that their right to open their windows is a reasonable right as a resident, and that noise from WISSC when they do so interferes with their enjoyment of their home.

8. Wider impacts

Making Manchester Fairer states:

“There is concern about growing inequalities within the city – not just in comparison with other parts of the country. Participants highlighted the huge challenges to services, which were described as underfunded as well as over-stretched. The difficulty of accessing health services, especially appointments with GPs and dentists, are well documented. Other wider issues were raised too.... Digital exclusion is a significant barrier to using services, not only because of the costs but also because many can only be accessed online – an extra barrier for people who cannot read or write English. Many participants said that there could sometimes be a lack of accessible information meaning that some people don’t know that services exist.”

A significant concern of Moss Side residents is the way in which the continuing growth in housing in the area impacts upon the well-being of residents and upon their ability to access key services such as doctors and dentists. Both the Maine Road development and the Bus Depot development identified sites for health facilities, but neither ever materialised.

The Reno development is specifically designed to bring more people into the area; it aims to contribute significantly to overall housing and social housing targets. But the anticipated growth in population is significant, and the fact that 72% of the new units would be one or two bedroom apartments (neither family housing nor older people’s housing) suggests that this would be likely to be a younger population and thus more digitally aware and competent.

Institute for Government research indicates that the proportion of patients seeing a GP in person has plummeted from 80.7% in 2019 to 66.2% in 2024, with more contact being on-line or by telephone. As Making Manchester Fairer notes, “digital exclusion is a significant barrier to using services”. Competition for GP time and services with digitally aware younger people brought in by this development is likely to disadvantage many Moss Side residents, making it yet harder for them to access health services.

Guide to Supplementary Housing Standards states:

Improve housing quality : UDP Part 1 Policy H2.7 states that new housing will expected to be of a high standard of design. Improving the design of dwellings is considered to be a way of also improving the health of the occupants. This can be achieved by designing and orientating dwellings to maximise natural light and provide views over aesthetically pleasing spaces.

As this response has shown, there are considerable concerns about the availability of natural light in this development; there is no “view over aesthetically pleasing spaces”; and residents will be living in an extremely crowded environment. These are not conducive to good health.

9. The scale of the development

Further reference to Council policy:

The layout of the scheme and the design, scale, massing and orientation of its buildings should achieve a unified urban form which blends in with, and links to, adjacent areas. Increased development density can be appropriate where it is necessary to reinforce community identity, promote a more economic use of land, increase demand for local facilities and contribute to safer, self-policed streets. However density levels must be informed by the character of an area and the specific circumstances of a proposal.

Although a street can successfully accommodate buildings of differing heights, extremes should be avoided unless they provide landmarks of the highest quality and are in appropriate locations. In established residential areas, significant variation in height may not be appropriate.

And further from the Manchester Plan:

“Even in areas where higher densities are appropriate, there is still a need to focus on family housing. In the main, this should manifest in a mix of housing units in which the majority are a conventional family format alongside more limited apartment provision.”

We contend that the height and density of this development are in conflict with the above statements. To the west of the development is the Alexandra Park social housing estate, to the north, next to the brewery, is the Monton Street social housing estate, to the east are terraced streets, and to the south, alongside the Clockworks, is a listed alms house complex and further terraced streets.

This development, with its density and height, is completely out of character with the adjacent areas. We do not accept that the height of the brewery, which is a commercial and not residential building, can be used to justify the height of a residential building which is completely out of the context of the residential buildings in the area and out of character. Nor does the development meet the standards of the second extract from the Manchester Plan.

10. Equality

In relation to social housing, policy states:

9.31 In different Strategic Regeneration Framework Areas the balance varies. There are small surpluses in North and East Manchester and Wythenshawe, and small shortfalls in Central and South Manchester suggesting that current policies aimed at achieving a

better balance of supply across the City will continue to be needed. To meet the shortfall in housing need, the Council will continue to develop provision on a city-wide basis since the availability of land for new housing and demand for affordable accommodation cannot be addressed on a small geographic area basis.

This development requires Moss Side, the most densely populated ward in the city, to contribute a substantial number of housing units, including social housing units. It has been explicitly stated that this development aims to significantly meet the city's targets. Opponents have been accused of "not supporting social housing".

All the signatories to this response are fully supportive of the Council's aim to build housing, especially social housing. However, we draw attention to the statement that "the demand for affordable accommodation cannot be addressed on a small geographic area basis". One tiny site in an overcrowded ward cannot be required to meet a significant proportion of the city's targets. We recognise that providing social housing is complicated, but reject this solution.

Additionally, our commitment to social housing is that it should be of good quality, which this manifestly is not. It is inferior to other examples of social housing elsewhere in the city, eg in Newton Heath. We are not prepared to endorse a model of social housing which offers a significantly inferior experience to that in other areas. Not only is this of immediate concern, but this development builds inequality into the future.

We do not accept that the existence of a small brownfield site near a bus route in Moss Side justifies the ward being forced to accept wholly unacceptable housing density and quality. We do not accept that Moss Side families should be forced to accept housing in apartments, some of which is at high level in a tower.

Moss Side has the highest level of ethnic minority population of any ward in the city (67.9%). The inferior and detrimental nature of the housing offer in this development is an equality issue. The Moss Side families who are offered apartments rather than houses will inevitably reflect that level of ethnic diversity. The Equality Act places a public duty to consider the effect of policies on those with protected characteristics, such as race.

Due to local ethnic make-up it is members of ethnic minority groups who will be more likely to be offered this inferior quality, densely packed, unattractive housing, in comparison to residents in predominantly white areas. This disparity will continue for decades. This is unacceptable.

Conclusion

We recognise and value the City's commitment to building housing and social housing. However we believe that when this scheme was first conceived there was inadequate understanding of a range of relevant issues which would have indicated that an extraordinarily intensive development on this site was inappropriate and harmful. We regret that, despite clear and constant articulation of the problems with this development, decisions have been taken which are seen as making it inevitable. Such decisions can and should be reversed.

This response gives a detailed analysis of why the Planning Committee should reject the scheme in total. We would welcome working with MSV and the Council about appropriate housing on this site.

Appendix: Funeral parking 28th July 2023



Moss Lane East and parking on the grass opposite the church



Raby Street



Westwood Street/Cardigan Street

Addendum to submission in response to
Planning Application 143777/FO/2025
which was submitted by

Moss Side Councillor Erinma Bell
Moss Side Councillor Mahdi Mahamed
Moss Side Councillor Esha Mumtaz

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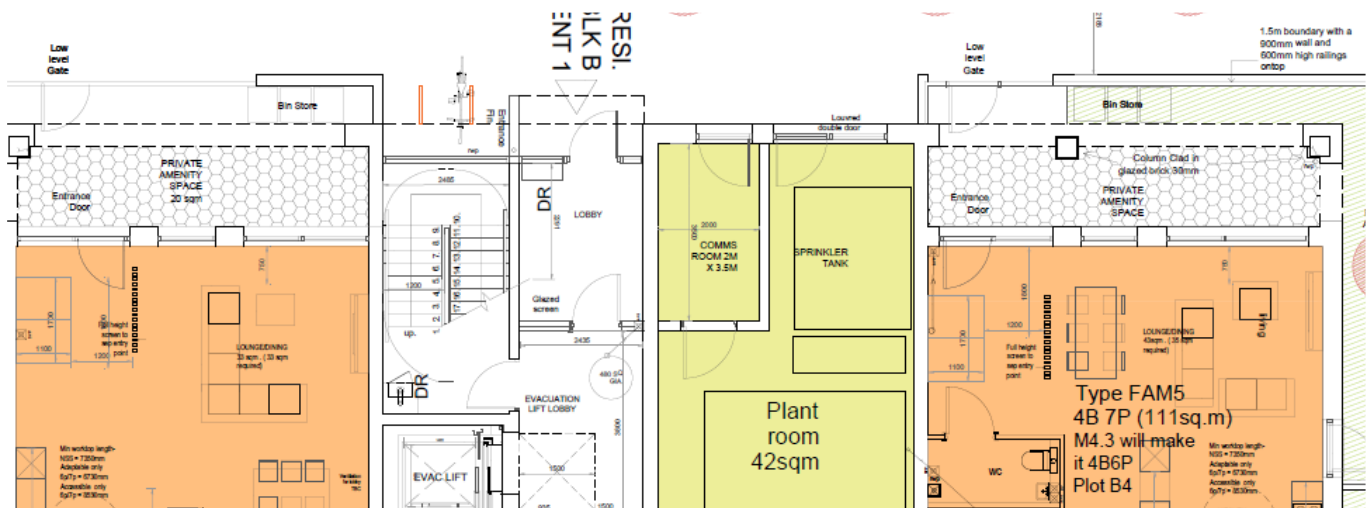
We request that you will accept this addendum to the response which was submitted within time by the above. This results from the opportunity to look more closely at two issues of key significance in relation to this application, namely “private amenity space” and “natural light”, which are related. We believe the issues raised are so significant that they must be considered.

ADDITIONAL RESPONSE

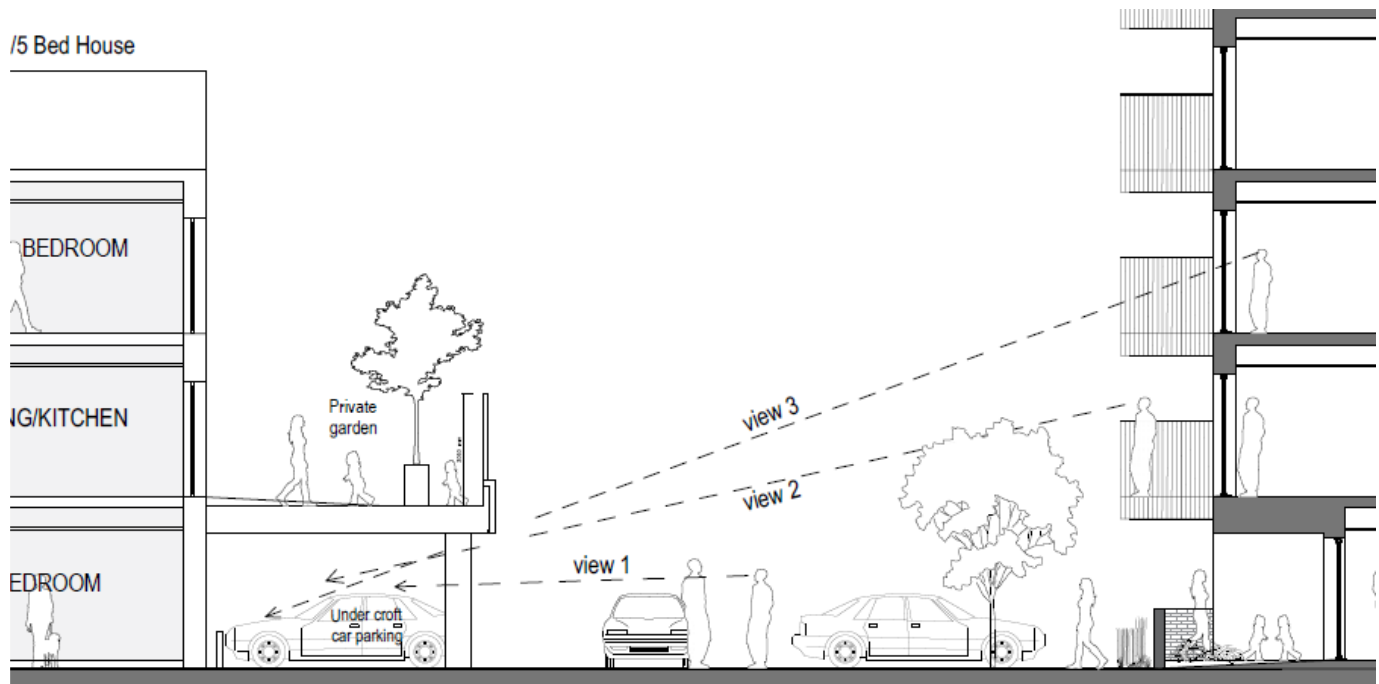
The plan of the ground floor of the development (below) shows that in Blocks B, C, D and E eight of the family dwellings have darkly shaded areas at the parking space end of the dwelling.



In finer detail below are the two family dwellings in Block B which we discussed in our initial response to the application. This detail shows that the areas which show as darkly shaded in the larger plan are identified as “private amenity space” (in the case of the dwelling on the left “20sqm”). **We should have identified earlier that these shaded areas are actually situated underneath the apartments above** (the dotted line being the boundary of the Block and the squares sited near this line are “column clad in glazed brick”).



This is also clear from the other diagram we submitted showing a side elevation. Here we originally identified the small area under the balcony as the “private amenity area”, since it was impossible to conceive that the actual “private amenity area” was the space to the right which is situated underneath the apartments above. However, our concern has led us to revisit the plans in detail and to identify that there is in fact no other explanation.



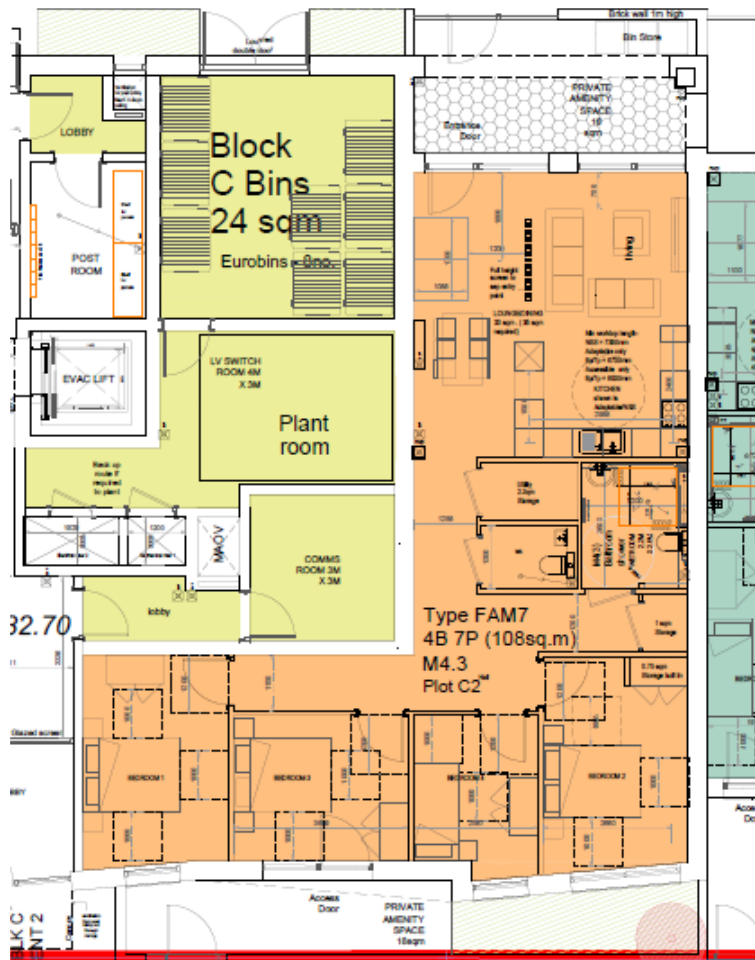
We cannot express strongly enough how extraordinary we find this. These “private amenity spaces” are not only accessible to the public but are analogous to a garage or other underground facility. Are families supposed to sit here to relax? Are children expected to play here? In what way can they realistically use this space for leisure or enjoyment? These “private amenity spaces” do not in any way meet the requirements set out in 10.9 of Guide to Development in Manchester Supplementary Planning Document and Planning Guidance, which we cited in our original response. We submit that no other housing development in Manchester has or would put forward such a proposal for family amenity space **and is wholly unacceptable in planning terms and in relation to Manchester’s commitment to “building a better and fairer Manchester”**.

We submit, too, as a separate document, an article from the Manchester Evening News about the problems of anti-social behaviour faced by residents in the Clockworks development immediately to the south of the proposed Reno development. In response One Manchester housing association is planning “improved door systems” and “long-term security solutions”. This is for a “closed” development, completely protected by entrance doors. The “private amenity spaces” on the Reno site are (as noted) directly accessible from the car park which would be particularly vulnerable to the kind of behaviours in the article. This concern is compounded by the fact that these spaces underneath the apartments would be attractive to the rough sleepers identified as problematic at the Clockworks.

In our previously submitted response we noted that

As the diagram shows on the right, the narrow “private amenity space” is directly under and not even as wide as a balcony. This will affect the amount of light available, particularly since there is also an intent to plant trees in the parking space, thus restricting light even further. **Not only does this affect the amenity space, but since the windows in the communal living space need to provide light into internal spaces which have no windows, this suggests that internal light levels are likely to be poor.**

The now identified fact that the “private amenity space” is actually situated underneath apartments means that the capacity for light to enter the building is much more severely compromised, since the windows which are the source of light are situated in a wall at the back of a significantly shadowed area. **We find it difficult to believe that any reasonable assessment would indicate that light levels within the dwelling would be adequate for everyday living.**



The issue of light is particularly apparent in this Family 7 dwelling (4 beds 7 people). The only light available to this building is from the windows overlooking the “private amenity space” – which is actually a shadowed space under apartments – and windows in each of the four bedrooms which face onto Princess Road. The light into the open plan area is clearly likely to be significantly compromised. Beyond the open plan area there is a utility room, a toilet and a bathroom, with no source of light, and then a further extensive inner area (from which the bedrooms lead) which again has no source of light.

The layout of the apartments is clearly driven by the need to accommodate the development’ infrastructure, rather than being designed with a family in mind. Each, therefore, tends to have slightly different amounts of outdoor space, etc. However, all those with overhanging apartments will have significant light issues.

We reiterate our view that this development is in no way a high quality development in an attractive environment. We are amazed at the family accommodation which is being offered, both on the ground floor and on areas above.

We reiterate our view that the scheme should be rejected as a whole.