

Hough End Leisure Centre / Hough End Fields.

Planning Application Reference: 129948/VO/2021

I have the following comments on the proposals.

I frequently visit Hough End Fields and value it as an open space for relaxation and exercise. My visits have increased over the last year as a consequence of the restrictions resulting from the Covid-19 pandemic. I envisage that my increased level of use, like that of many non-sporting users, will continue.

I support the concept of making improvements to the site to improve public accessibility and citizen health and well-being.

I have no major objection to the demolition of the condemned building and extension of the existing building, including the provision of a cafe.

However, **I find the proposals flawed in overall conception while some aspects are actually destructive. My detailed objections follow.**

I am very disappointed that there appears to have been no consultation prior to the drawing up of the plans. This follows a woeful “done deal” approach to community consultation and planning.

Matters of concern

Hough End Leisure Centre / Hough End Fields.....	1
Reduction of open space.....	1
Exclusion/inclusion and rethinking the fields as a multi-use space.....	2
Multi-user amenity.....	3
Climate change and greenhouse gas emissions.....	3
Biodiversity and the natural realm.....	5
Red Lion Brook.....	5
Trees.....	6
Plastic pollution.....	6

Reduction of open space

The Council’s Citywide Development Control Policy, Part 2 Area 13: Chorlton and Barlow Moor under ‘Environmental Improvement and Protection’, states ‘*The Council will retain the open character of Hough End Playing Fields as a major recreational facility and seek to improve the visual appearance of the site*’. ‘*Hough End Playing Fields form a large site of high recreational leisure and open space value...The Council*

wishes to protect this'. The fencing of some areas goes against this policy.

The proposed development would reduce the open space at Hough End Fields due to the increased car parking and the fencing of some of the pitches.

The applicant claims that there is a minimal reduction of Open Space from 35 hectares to 34.9 hectares. However, considering the fenced off areas, the reduction in Open Space appears closer to 17%.

Hough End Fields is 35 hectares in total - the area bounded by red lines in the planning application is 6.12 hectares, comprising fenced off pitches, the new changing rooms and 167 car parking spaces. This is equivalent to 17.5% of the current open space.

Exclusion/inclusion and rethinking the fields as a multi-use space

Children.

Currently there are children's pitches but in the proposal all the pitches appear to be adult pitches.

Disabled and older people

While, *"There will be targeted programmes for under-represented groups including but not limited to Women and Girls, Disability Groups and Older People."* (FAQ) these are organised programmes. There has been little thought applied to questions of informal leisure, including the provision of benches and some accessible footpaths.

"... a children's play area or sensory play area has not been planned as part of this proposal." FAQ

Local communities

While the transport plan does indicate accessibility to local housing, there is a community close by that will not be served: the Arrowfield Rd estate is on the other side of the tram track with no crossing point. It would be advisable to consider the provision of a footbridge between the estate and the fields, making them accessible on foot and cycle.

"Additional residential areas and associated facilities/amenities can be accessed within 1,000m - 2,000m of the site, as the site is located within a wider residential area of south Manchester, with Withington situated to the immediate east, Fallowfield to the north-east, Whalley Range to the north-west, and Chorlton-cum-Hardy further to the west." Travel plan 5.2.9 But no mention of Arrowfield.

Access from Metrolink

It is astonishing that the possibility of improving access from the so-called Withington tram stop has been rejected. This involves a walk along an extremely busy main road. Repair and upgrading of the access

(for the fit only given its very deteriorated state) just north of the tram-line would make walking access directly into the fields possible.

Multi-user amenity

The softball development is to meet a regional demand, not a City demand, which, as the application points out, is adequate. Softball provision is relatively inclusive, with its predominately mixed gender teams (<http://manchester-softball.co.uk>) and this would open up space on Hough End fields to more women teams. However, the fencing requirements and the concrete dugout will destroy the nature of the North field.

There is a need to rethink the the location of the softball pitch.

I can see no analysis for the need for a baseball pitch: there are other games as or more worthy of support which have lower material demand on the site.

- **I do not support the exclusive continued use of most of this large open space for the predominantly male and competitive sports of football, rugby, cricket, Gaelic Football, nor the addition of the North American sport, Baseball.**
- **I do not support the removal of reduced size pitches which will reduce usability by children.**
- **I do support the inclusion of amateur Softball facilities, (which would likely not require the level of hard infrastructure proposed), which are accessible to mixed generation teams, but would like to see these replacing football pitches, which are under-utilised anyway.**

The pandemic has led to many people discovering the joy and practical benefit of walking, picnicking, sunbathing, kite-flying, frisbee, catch games, golf practice, dance, idling with a book, and so on, in the fields. This should be recognised and supported. **The North field itself should be reserved as meadow with no sports fields, for multi-use recreation, both non-competitive and informally competitive in nature.**

Hough End Fields are used by a variety of people for a variety of activities. These go well beyond competitive, male-dominated sports. **I object strongly to the further intensification of competitive sports on this large public space. Instead, the council should be turning it into a multi-functional public park, catering for a variety of activities for all sections of the community.**

Climate change and greenhouse gas emissions

Manchester City Council has declared a 'Climate Emergency' and works to a demanding carbon budget, reducing to almost zero by 2038, to represent our fair share of the global emissions that could yet be made with a chance (actually a rather slim one at these emission levels) of keeping within safe global heating limits. Any additional emissions, and any foregone opportunities to sequester carbon, are therefore totally unacceptable, helping to condemn

much of the global population, including those yet to be born, to a catastrophic fate. Yet we see in this proposal a cavalier attitude to the climate and ecological crisis.

1) An increase in car parking.

The plan states, **“The maximum permitted level of parking is proposed at this site, with 67 additional car parking spaces in the main car park”** (travel plan 4.3.3,) and also an overspill car park.

I submit that this is an encouragement of private car use and hence of unnecessary emissions. This is despite the claim that excellent public transport links are present, including the so-called Withington tram stop and bus stops on Princess Road and Mauldeth Road West.

The Council’s Climate Change Delivery Plan aims to *‘engage all individuals, neighbourhoods and organisations’ to embed “low-carbon thinking”*. This is inconsistent with encouraging greater car use **so the proposal must be declined.**

There is only 1 mention of coaches in the Travel Plan and that concerns site access not encouragement of **collective transit in lieu of cars.**

Furthermore the provision of extra car parking spaces means the **loss of opportunity for increased carbon sequestration**, which could be aided, along with better air quality, by putting in carefully designed plant assemblages.

2) Overall site emissions not assessed.

The tabled *Sustainability Appraisal* only considers carbon dioxide emissions associated with the construction and use of the new building. It does not include the significant carbon emissions involved in the construction of the proposed 3G pitches and baseball pitch. Replacing grass with an artificial material is a poor choice from a sustainability perspective. The materials and construction involved are significantly carbon emitting.

There needs to be a comprehensive quantitative assessment of the carbon impact of the entire development, covering both the construction and ongoing impacts, comprising building and other material inputs, travel, and land-use changes, including loss of tree and grassland cover.

3) The building misses an opportunity for solar gain.

While there are many sound ideas in the actual building design, the avoidance of solar gain is a mistake. Solar gain from glass covered South and West facing walls can make a significant contribution to space heating. It has to be appropriately designed and managed but these statements are telling (sustainability appraisal section 5):

“The building’s south façade avoids the use of glazing to reduce solar gains to the spaces. West facing glass has been provided with passive solar shading, to reduce the potential risk of overheating during late

summer afternoons and evenings. Non-temperature-sensitive spaces (such as the plant room) have been deliberately placed on the south façade, so that temperature sensitive spaces can be prioritised for location on the east and west façades.”

And while,

“The building has been developed to maximise, where possible, the daylight potential to the spaces to maximise the ability to harness light and reduce the electrical energy consumption of the artificial lighting systems.” An analogous opportunity with the much greater heating demand has been missed.

Solar space heating is omitted from the table on page 17.

Biodiversity and the natural realm

The Biodiversity survey is rather superficial. It does not mention insects, yet the site is frequented by many swallows and swifts in the summer months, feeding on the insects. There is also a large population of corvid species.

3.3.8 “Invertebrates

*Since the site was dominated by amenity grassland, it was concluded that there was low **potential for significant invertebrate assemblages”***

So no actual assessment has been made.

The proposal as a whole and its assessments do not offer the opportunity to improve the natural realm. This could involve the perimeters (these are mostly just scrubby areas with no obvious management: hedgerows could be planted and areas of grass allowed to grow with only annual cutting after seeding. The wooded area could be extended with attention to shrub and understory diversity. The brook too offers opportunities for nature and biodiversity whereas at present it just seems to be treated as an inconvenience. Indeed these measures could offer high “ **potential for significant invertebrate assemblages”**.

A biodiversity strategy would include steps to increase the biodiversity of such a large green space with varied habitats: the absence of this is a huge gap in the proposal.

Red Lion Brook

Red Lion Brook flows through the fields. It is a somewhat neglected watercourse, with sections canalised. There is an opportunity for restoring a more natural course which would flow more slowly, increasing the ecological edge and providing habitat for amphibians and other species.

Proposals to increase the area of hard surfacing (buildings, car parks etc) and for them to drain into the brook, are questionable given the predictions of increasing rainfall as the climate crisis intensifies in coming years. Already, the flood risk downstream is increasing, see <https://tinyurl.com/2u3hm55c>.

Trees

23 trees will be removed and replaced with 46 trees. This nevertheless means a net loss of carbon stock since it takes many years for new trees to reach the size of the felled trees.

Plastic pollution



image from <https://www.3ptechnik.co.uk/how-to-stop-microplastics-from-artificial-turf-sports-pitches-polluting-our-oceans/>

The provision of 3G artificial all weather pitches is a matter of concern. The proposal brushes aside objections with, *“Indeed, the European Chemicals Agency has recently published its own findings, following an extensive EU-wide study, and has found no reason to advise people against playing sport on 3G pitches with rubber crumb.”*

The [ECHA](#) did state the above, but their report also produced recommendations including:

“Consider changes to the [REACH](#) (Registration, Evaluation, Authorisation and Restriction of Chemicals) regulation to ensure rubber granules were only supplied with very low concentrations of PAHs and any other relevant hazardous substances.

Ask owners and operators of existing (outdoor and indoor) fields to measure PAH and other substances’ concentrations in rubber granules used in their fields and making such information available to interested parties in an understandable manner.

Ask producers of rubber granules and their interest organisations to develop guidance to help all manufacturers and importers of (recycled) rubber infill test their material. ”

The precautionary principle would militate against the use of such substances. I have no confidence that significant amounts of rubber crumb particles will not,

1. adhere to players and their clothing and equipment, to be washed off and pollute the water system,
2. be blown off the pitch, especially when disturbed by play, and pollute the surrounding soil and ultimately the watercourses (see <https://www.sciencedirect.com/science/article/abs/pii/S0045653520328058>), as well as increasing the proportion of potentially harmful micro-organisms. A study has found that the relative abundance of potentially pathogenic bacteria was higher in synthetic than in natural samples <https://www.sciencedirect.com/science/article/pii/S2405844019359948>
3. present a continuing toxic hazard to participants, spectators and wildlife.

See also <https://www.pitchcare.com/news-media/3g-pitches-is-the-uk-sleepwalking-into-a-public-health-crisis.htm> | <https://www.sciencedirect.com/science/article/abs/pii/S0013935118305528> <https://www.pnas.org/content/116/50/25156.short>

If the outcome were to continue with the proposal for all weather pitches, then, following the precautionary principle, other options should be explored.

“Several companies have turned to the waste of the 75 billion coconut husks produced every year, 85% of which is currently burnt or landfilled, with olive pits, walnut shells, and wood also being used successfully. Moreover, cork infill has long been used as a suitable alternative, supporting a sustainable rural industry and biodiverse habitat.”

https://www.eauc.org.uk/3g_sports_pitches_so_long_to_rubber_crumb

Most of the evidence and available discussion centres on the question of the rubber crumb infill. However, a further problem is the plastic grass itself. The microplastic particle risk from the plastic grass appears to be an unknown quantity but given that wear and tear will occur, this should also be considered in applying the precautionary principle.

To conclude, this is part of the summary from a 2020 literature review on the hazards of microplastics. The focus is on tyre and road wear but is relevant to the rubber crumb problem, especially given the origin of the rubber in used tyres. **This is later than the ECHA report.**

“There is currently insufficient knowledge to evaluate the effects on the environment and human health caused by the exposure to current levels of microplastics in the environment. Despite this, the fact that emissions from tyre and road wear are very high and increasing; that the particles are likely to be persistent in the environment; and that the particles themselves, as well as hazardous substances in particles, or adsorbed on the surface of the particles, may cause negative effects on organisms, are deemed sufficient to motivate measures to be taken.”

<https://www.diva-portal.org/smash/get/diva2:1430623/FULLTEXT02.pdf>

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