

Please note: these are the objections of group member FS Paris and reflect her own personal views. Please feel free to use any factual information from them to support your own objections.

I object to the proposals on the following grounds:

- **Does not adhere to Planning Policy in relation to Environmental Protection**
The Council's Extant Unitary Development Policy - 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'. It is stated that 'Hough End Playing Fields form a large site of high recreational leisure and open space value...The Council wishes to protect this'. Quite simply the Open Space Value is destroyed if the existing pitches are fenced.

On this basis the proposal is unacceptable and should be refused.

- **Does not support Climate Change Delivery Plan for Manchester**
Manchester City Council have declared a 'Climate Emergency' so it is completely inappropriate to provide this number of car parking spaces and encourage use of cars and the increased emissions. Excellent public transport links exist serving Hough End Fields including the nearby Withington tram stop and St.Werbergh's Road tram stop. Bus stops on Princess Road and Mauldeth Road West are even closer. The Council's Climate Change Delivery Plan aims to 'engage all individuals, neighbourhoods and organisations' to embed "low-carbon thinking" and to reduce annual carbon dioxide emissions by 41% on 2005 levels. This will not be possible by encouraging greater car use.

Disappointingly the application only provides for an additional 24 cycle spaces – this hardly supports the Council's stated aim of encouraging greener modes of transport.

In addition, the 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 on non-brownfield site is completely counterintuitive. The materials and construction involved in these features can be significantly carbon emitting and I believe this must be taken into account in the sustainability appraisal of the development or it does not reflect the true amount of carbon emissions associated with the development. I expect that by including the construction of the artificial pitches this would take the development's carbon footprint over the objective limit. Furthermore, replacing grass (a natural carbon sink) with artificial surfaces (no ability to capture carbon) will reduce resilience to climate change in Manchester, as well as increasing the urban heat island effect.

On this basis the proposal is unacceptable and should be refused.

- **Does not adhere to Policy EN10**
In the Council's Policy EN10 of its Final Core Strategy under 'Safeguarding Open Space, Sport and Recreation Facilities', it states that the Council will seek to 'improve the quality and quantity of accessible open space, sport and recreation; ...improving the network of existing open spaces, increase accessibility to green corridors, and enhance biodiversity'

The ecological report says the greenspace is 'low value for wildlife'. However, the report failed to consider the essential role of Hough End as a 'green corridor' (which Manchester City Council says it is committed to providing, according to its Citywide Open Spaces Sport and Recreation Study). Reducing and fragmenting Hough End Fields by developing on it further and fencing off areas, will reduce the area's value and use as a 'green corridor' and poses a risk to biodiversity. This includes key protected species (e.g. RSPB red listed starlings and swifts) that use and migrate to and between Hough End and other nearby green spaces. In addition, loss of such greenspace reduces ability to mitigate effects of climate change in Manchester and reduces the ability of the land to capture and store carbon.

Policy EN10, states that development proposals on existing open spaces and sport and recreational facilities (e.g. Hough End) will only be permitted where 'equivalent or better replacement open space, sport or recreation facilities will be provided in the local area'. It also states that only proposals on existing open space will be considered if the development 'will be ancillary to the open space, sport or recreation facility and complement the use or character'. The applicant's proposals actually reduce the amount of open space and reduce the recreation facilities on the site. There is a loss of any youth sized pitches and the existing use and character of Hough End Open Space should be maintained as open, accessible to all playing fields and not fenced pitches where access is restricted to only those able to pay.

On this basis the proposal is unacceptable and should be refused,

- **Does not adhere to Policy EN15**

In Policy EN15 'Biodiversity and Geological Conservation', it states that the council will maintain or enhance sites with protected and priority species, as listed in Manchester's Biodiversity Strategy. One such species is the Pipistrelle bat. The proposed development would have a negative on this animal. Pipistrelle bats have been recorded near Hough End and bats forage on site. They are legally protected as 'Schedule 5 animals'. The Bat Survey included within the application was carried out in March when any bats in the area would be in hibernation. Consideration of the application should be delayed until such time as a full bat survey can be carried out. Bats may use the existing vacant changing rooms as this is just the type of structure that is attractive to roosting bats. Any bats on the site would also be negatively impacted by the proposal to install high powered flood lights to much of the area (see below under 'Effect of Floodlights').

On this basis the proposal is unacceptable and should be refused.

- **Does not adhere to Manchester's Biodiversity Strategy - negative effects on protected and priority species**

The ecological survey was carried out in March 2021 when certain legally protected species – e.g migrating birds such as swifts – would not be located on the site, yet they are present during spring and summer months, foraging on site. Furthermore RSPB red listed starlings feed and nest on site. In addition, hedgehogs are also present on site. Hedgehogs are a 'species of principal importance' and are listed in Manchester's Biodiversity Strategy as requiring 'conservation work to stabilise and increase their numbers'. However, the proposed development would have negative effects on their numbers as nesting, hibernating and feeding ground would be destroyed. Hedgehogs would not have been detected in the survey that

was done in March 2021 as they would still have been hibernating at this point. The ecological survey is inadequate and consideration of the application should be delayed until such time as a full ecological survey can be carried out. The proposals also state that “dense vegetation” will be removed from the site (Demolition Plan, Planning Statement for the Softball Court) and this is exactly the type of vegetation that is essential for protected and priority species.

On this basis the proposal is unacceptable and should be refused.

- **Does not comply with Parking Standards within the Core Strategy**

The Transport Statement states that to comply with Planning Policy a maximum of 67 additional spaces should be provided as part of the application. It is stated that 100 additional overspill spaces are provided as part of the application. This cannot in any way comply with the Council’s stated Planning Policy and defining these spaces as “overspill” should not mean that these are dealt with differently to a normal car parking space. By allowing these overspill car parking spaces, this will mean it is still a breach of the Policy which states that 67 additional spaces is a MAXIMUM. In total 167 spaces are proposed as part of this application and within the submission pack the applicant themselves refers to this as “a vast number of car parking spaces”. This does not comply with Planning Policy and on this basis the proposal is unacceptable and should be refused.

Despite proposing to increase the car parking spaces from 196 existing to 363 proposed, the application still maintains that a single point of access off Princess Parkway is sufficient for this number of cars, potentially all arriving at the same time. In reality this number of cars would not only cause congestion within the carpark but also cause cars to queue along the main road waiting to access the site. A single point of access is insufficient for managing a carpark of this size and a full Traffic Impact Assessment should be carried out if it is anticipated that this number of cars, plus drop off coaches will be accessing the site at any one time.

On this basis the proposal is unacceptable and should be refused.

- **Reduction of open space**

The Open Space Assessment identifies that the proposed development would reduce the current open space at Hough End Fields due to the increased car parking hardstanding and the footprint of the new building extension. Although this is stated as a “small reduction”, any reduction in open space is unacceptable. It is not clear how the 0.1h reduction calculation has been derived and the applicant should provide details of this to allow full public scrutiny.

In any event this reduction in open space is unacceptable.

Furthermore, there is a proposed reduction in the number of football pitches - all of which are identified as adult pitches - with no provision for children’s pitches (as there currently is). The suggestion that this development would promote grassroots football among children is, therefore, unconvincing.

On this basis the proposal is unacceptable and should be refused.

- **Effects on Rights of Way**

The planning application claims that no Rights of Way would need to be extinguished as part of the proposal. However, fencing the football areas would potentially affect existing Rights of Way established by dog walkers and others crossing the area, if these pitches are to be locked. We believe that as the area is designated as “Open Space” a public right of way has been established across the entire site. In addition the extension to the existing leisure centre seeks to build across an established public right of way, currently running along the front entrance to the centre and out to the fields and on this basis the proposal is unacceptable and should be refused.

- **Inadequate Statement of Community Involvement.**

It is naïve and arrogant of the applicant to fail to adopt a best practice community engagement strategy for this project. An enormous contingent of the local community use the Hough End Playing Fields on either a formal or informal basis and absolutely no effort has been made for the applicant to engage with interested parties as part of the development process. This is entirely unacceptable. The applicant seems to believe that having internal meetings with MCC colleagues and interested parties as stated within the SCI section of the planning report is sufficient to satisfy any requirement to consult with the local community. The level of concern and objection amongst local residents clearly evidences that this is misguided.

The local community are clearly very keen to engage on this proposal and the application should be refused to allow full consideration and review of the local communities’ views given the value of this space.

MCC have a duty to exercise “Open Government” and the failure to properly engage with the local community on this proposal is a failure in this duty.

On this basis the proposal is unacceptable and should be refused.

- **Current provision meets demand – unnecessary development**

There is no current need for the proposal. The report from the Strategic Director (Neighbourhoods) on MCC’s Capital Strategy for Leisure Facilities (Jan 2020) ‘informed members that leisure provision was currently sufficient to meet demand’ <https://democracy.manchester.gov.uk/ieListDocuments.aspx?CId=149&MID=584#A14137>

On this basis the proposal is unacceptable and should be refused.

- **Breach of Restrictive Covenant**

Hough End was originally given to Manchester City Council by Lord Egerton and a Restrictive Covenant placed on the Title of the land “not to use or permit to be used this area for any purpose other than as an open space and recreational ground for the free use of the public”. This is especially relevant as by fencing the area, it’s likely you will be charging for use and reducing the public open space. As the Covenant is in favour of the public ie. free use, any breach of this Covenant should presumably compensate “the public” for loss of free rights over the area.

On this basis the proposal is unacceptable and should be refused.

- **Reduction in air quality**

In the Air Quality assessment document, they state the IAQM (International Air Quality Management) threshold for development-generated LDVs (light duty vehicles ie. cars) is 'expected to be exceeded'. Manchester City Council itself say on their website: Nitrogen dioxide levels are particularly high in the city centre and close to busy roads. Princess Road is one of the main routes into Manchester and extremely busy, as local residents know. Proposing to increase the amount of car parking on the site can only make air quality within the area worse, impacting on the health of those using the site for sport but also those within the local area.

On this basis an increase in car parking is unacceptable and the proposal is unacceptable and should be refused.

- **Increased risk of flooding**

Part of Hough End is included within Flood Zone 2 (in the Environment Agency's flood risk assessment for the area). Although not included within the red line boundary of this site, this area is adjacent and the impact of the proposals ie extensive hardstanding for car parking, as well as artificial surface areas for pitches, adjacent to this area will put additional pressure the area and on Chorlton Brook which runs along the north of the site, as a result of rain water run-off. The last year has seen significant flooding within the local area and year on year as a result of climate change this is expected to intensify.

The proposal will increase the likelihood of this and on this basis is unacceptable and should be refused.

- **Effect of floodlights**

The plans claim there would be no impact of the flood lighting or fencing on wildlife; however, this is not correct. There are bats on site which forage at Hough End. Bats are legally protected as Schedule 5 species and both their foraging and roosting behaviour are known to be negatively affected by floodlights.

Floodlights would also impact on adjacent residents as the proposed development has its hours of opening until 10pm. Such bright lights until this time would disturb and disrupt residents' sleep, causing problems. Additionally, the noise and emissions from vehicles accessing or leaving the site at this time, would further disturb residents.

On this basis the proposal is unacceptable and should be refused.

- **Loss of trees**

This would have negative impacts on the ecology and character of Hough End. The developer would be removing very large (height of 11 – 17m high), mature, quality and healthy Category B trees as part of the development including Ash, Sycamores, Red Norway Maple and London Plane. As Category B trees, it is unacceptable for these to be felled as part of the development. Given the maturity of the trees consideration should be given to listing these trees under a Tree Preservation Order.

Additionally, a young Oak tree would be lost. Oaks host the most species out of all the native woodland trees and are hugely beneficial in a woodland. At 5m high, the developers consider it small enough to transplant; however, it is unrealistic to successfully transplant an oak of 5 metres high, since it will be over 10 years' old and have formed a significant root system. Loss of trees has a range of negative effects

including reduced carbon capture and storage, reduced removal of air pollutants and particulate matter, loss of wildlife habitat, reduced capacity of the ground to absorb surface water, and increased noise pollution (mature trees are excellent sound absorbers). The proposed mitigation measures to replace over 23 of the lost trees are inadequate. It takes many years for any new trees to become established in order to confer the same or similar benefits as the lost trees.

Furthermore, the planner (Case Officer Principal Planner Rob Griffin) commented himself that there would be 'zero loss of viable trees' and that the use of a mitigation strategy depends on the quality and maturity of the new trees proposed. These would have to equal or improve on the quality of the native Ash and Oak that would be lost. This would be very hard to do.

The Softball Planning Statement identifies a further area adjacent to Chorlton Brook that would require culling. This area is identified as a wildlife corridor along the Brook and therefore has significant benefits for nature.

On this basis the proposal is unacceptable and should be refused.

- **Is not equitable and accessible for all – indirect discrimination under Equality Act (2010)**

Currently, Hough End Fields is an open greenspace, free of charge for everyone to use. Many people go there to play sports casually, without the need for paying or booking or specialised equipment or clothing. However, a fenced off, paid for sports development would discriminate against those who do not have the means to access this. Furthermore, the current open space is accessible to all. Fencing off areas of open space on public land would indirectly discriminate (Equality Act 2010) against people who are no longer able to walk freely across, such as pregnant women, as well as people with disabilities and mental health problems (protected characteristics).

On this basis the proposal is unacceptable and should be refused.

- **Failure to conduct a real time baseline noise level and establish a true baseline**

The baseline level for the noise impact assessment was unable to be completed due to Covid restrictions. Instead, a desktop study was completed and figures taken from historic studies. I believe that a noise impact assessment must be completed as standard prior to the scheme being considered. Although the authors of the report state that this was a robust approach as 'background noise levels generally increase over time', they fail to take into account the changes in travel and therefore the reduction in noise resulting from the pandemic – this is due to the increase in working from home and its effects on traffic within the area. This means that the baseline figure for the area is likely to be different than expected based on historical records. The difference between the baseline noise figure and the expected noise resulting from the construction and the operation of the new development may well fall into the 'adverse' or 'significant adverse' category.

Furthermore, it is clear that, following development, the pitches will be holding more sports games and matches, therefore increasing spectators and this will subsequently increase noise levels.

On this basis the proposal is unacceptable and should be refused.