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FAO: Mr Robert Griffin
Case Officer
Manchester City Council
By email to: robert.griffin@manchester.gov.uk

Date: 31st March 2025

Our Ref: 23-009-ltr-001

Re: Representation against application 142223/FO/2025 (Erection of a residential development comprising 120 dwellings (including a mix of housing types and tenures) together with open spaces, landscaping, sustainable drainage features, cycleways and pedestrian footways, vehicular accesses and highways, parking provision and other associated works) on behalf of the Friends of Ryebank Fields (FoRF)

Dear Mr Griffin

Urban Imprint have been engaged by the Friends of Ryebank Fields (FoRF) to make representations on their behalf to the above referenced planning application for the land which is known as Ryebank Fields.

Urban Imprint have been advising the FoRF for several years following the Council's decision (under delegated authority) to draft a Development Framework for the site in 2019. In providing this response we have spoken directly with several members of the local community. We are aware that there has been a long and consistent objection to the redevelopment of this site for housing, and that by far and away the most common response to the latest round of the local plan was in objection to this scheme (some 43% of respondents wished to see it allocated as a Local Green Space). It will therefore be of little surprise to note that this representation sets out an in-principle objection to the scheme. In short, the development would not achieve an appropriate balance of social, economic and environmental sustainability sought by the Framework or policy JP-S1 of the Places for Everyone (PfE) strategy.

Having examined the application package in some detail, it is our professional view that there can be no planning justification that would otherwise support the development of this non-allocated, greenfield site. Whilst we recognise that there is a significant housing shortfall within the UK, this in and of itself should not lead to inappropriate development coming forward that leads to the loss of the limited number of urban greenspaces that remain in the city. We also note that the application, as presented, appears to be very poor quality, exhibiting a 'silo thinking' mentality despite the EIA nature of the scheme, and the layout which is presented seems to run counter to the findings of the reports. In many ways it appears clear that a development scheme was designed and set out without consideration to the detailed constraints studies undertaken.

In making this response we are also aware that a 'linked' planning application has been submitted to Trafford MBC which is for engineering works to establish a northern access point to this proposed development. A copy of the representation that we have prepared to the Trafford

portion of this scheme has been appended to this submission for completeness. These applications therefore rely wholly on the delivery of each to ensure that the scheme as presented can be realised. We also note that whilst the application is at the very edge of Manchester City Council's area, there are a significant number of heritage, highways and ecological issues that are cross boundary with Trafford – these are flagged as part of this response where this is relevant. At present there is a distinct lack of clarity and transparency as to how these two 'linked' applications will function collectively, and what might be the implications for the other if one or other was to fail.

You will note that within this balance we have not included the possible 'benefits' of the sale of this land to MMU and their wider educational elements as the applicant has done. We are unable to see any evidence within the submission of how this will be facilitated and on what projects or educational specifics this might be spent – in fact it appears it may be simply placed in a large pot. As a result this cannot be considered to be a material consideration.

Appended to this response for your convenience are three key documents previously produced by FORF which are referenced as part of this response. They include:

- The response made by the FoRF to the EIA screening and scoping report submitted for this application (EIASCO/24/006) dated 17th December 2024
- A paper setting out the FoRF justification for the site to be designated as Local Green Space (Refreshed version 2024)
- A preliminary ecological appraisal commissioned by the FoRF and conducted by Stuart Spray Wildlife Consultancy (dated February 2025)

<u>Objection in principle: need does not outweigh the losses</u>

The objection in principle relates to three interlinked elements which can be summarised as follows:

- That the development of this greenfield site would result in the loss of a significant semi-natural greenspace and Strategic Open Space (identified by MCC's own evidence base documents in the City Wide Open Space Analysis [2009] and the Residential Quality Guide [2017] respectively) which has impacts for biodiversity, nature recovery, green infrastructure networks and local health and wellbeing.
- That whilst there is a countrywide housing shortage, in Manchester annual housing delivery and pipelines are sufficient to meet housing needs targets without having to develop this site. Additionally, the recently adopted PfE strategy allocates more than sufficient sites throughout Greater Manchester to meet housing need.
- That this site is neither allocated within the PfE plan or the adopted Core Strategy, and is only identified within an officer led Development Framework (final sign off was

delegated to officer level) which in and of itself is based on a strategy for housing delivery outlined in a much earlier version of the Framework.

On this final point, the FoRF fundamentally dispute the weight that is given to the Ryebank Fields Development Framework (2019) by the applicant in their submission and planning justification. Whilst it is acknowledged that this is a material consideration in determining this application, the weight that is provided to it by the applicant seems to be significantly overstated - almost as if the MCC had 'allocated' the site for residential development. This is evidently not the case, with the site neither forming part of an adopted development plan or subject to examination, with community feedback on bringing the site forward being consistently negative. In line with paragraph 188 of the Framework the LPA should take a strategic approach to site allocation; seeking to allocate land with the least environmental or amenity value. In this respect, to afford the 2019 Development Framework as anything other than limited weight would not be considered to be robust planning practice.

The FoRF acknowledge the central government objectives to bring forward new housing to address a national housing crisis, but the redevelopment of this site seems to run counter to the narrative that is being presented. On 19th September 2024, the Prime Minster reiterated his approach to housing delivery as stated that it was not sensible to *'build on old playing fields which were outside of the Green Belt, rather than disused car parks in the Green Belt.'* In promoting this site for development (former playing fields) this is exactly the form of development that is coming forward. There are more than sufficient opportunities on brownfield sites identified in Manchester's own SHLAA to meet the housing requirements set out by development plan policy and the local housing needs set by central government.

Notwithstanding the purportedly lengthy pre-application discussions that have been undertaken – the evidence of which has not clearly and transparently been presented by the applicant - the application can only be viewed as if it were a speculative housing development on a greenfield site. The FoRF have previously asked for details of these meetings it was reported by MCC that they held no written records of these extensive discussions. It would be useful if these could be provided by either the applicant or the LPA to allow for transparency.

Loss of amenity: green space

As you will no doubt be aware, the current site lies at the heart of this community, being identified as being not only of special value due to its recreation and amenity value, but also as a space for the community to come together.

In the absence of an up to date local plan allocation for this site, it's important to consider how it is presented by other evidence beyond simply the Development Framework. The 2009 City Wide Open Space, Sport and Recreation Study identifies Ryebank Fields as being a semi-natural greenspace, of which that same document identifies a deficiency within South Manchester (the shortfall is identified as being some 60 hectares in South Manchester as of the date of that report). The Residential Design Guide (2017) also identifies Ryebank Fields as a Strategic Green

Space. The Chorlton Infrastructure Framework (CIF) adopted in February 2025 identifies Ryebank Fields as an open greenspace (figures 3.4 and 5.1). In this respect it is difficult to understand how the site can be identified as anything other than an open greenspace. In that respect paragraph 1.14 of the Places for Everyone document is important and it states that '*one of the biggest lessons from the pandemic is the importance of good quality greenspace close to where people live.*'

Neither the applicant nor the development framework from 2019 appear to provide any substantive assessment or justification for the loss of this established and identified greenspace, as would typically be required where the development was proposed on open space. In this case this is highly relevant as the space was former playing fields, and had for some period provided informal public access across the site after its use ceased in 1996 (as defined by the applicant's planning statement para 2.5). Paragraph 104 of the Framework (which also replicates guidance from much earlier in the Core Strategy policy EN10) sets out three key tests under which existing open spaces should be released from development. Having examined the proposals against these three tests it is clear that none of these are satisfied. In that respect, the loss of the greenspace cannot be justified. In fact, the development of this site would appear to run counter to development plan policies in PfE and the Core Strategy (specifically policies JP-G6 and EN9 respectively).

The applicant argues that the need to remediate the site means that what would be offered, albeit significantly less than currently provided, would outweigh the loss whilst dealing with the contamination on the site. At present, it appears that the works that are required for remediation appear to mainly be focused on ensuring that the site can be used as housing land with private gardens. The FoRF note that the contamination position on this site appears to have 'shifted' from discussions with the site's owner (Manchester Metropolitan University) to this developer. Nevertheless, the presence of contamination does not change the status of this site as greenfield given that the site has obviously 'returned to nature' in accordance with the glossary contained in Annex 2 of the National Planning Policy Framework.

The FoRF have repeatedly called for this land to be designated as Local Green Space (LGS), first submitted in 2020, in accordance with now paragraph 107 of the Framework. They recognise that this can only be undertaken through a local plan and made representation to the LPA to this effect during the early stages of the emerging Local Plan. It should be noted that in the 2020 consultation on the emerging Local Plan some 43% of all responses received across the whole of Manchester were specifically in support of the designation of Ryebank Fields as an LGS. Evidence of how the site meets the three tests set out in paragraph 107 of the Framework has been submitted to the Local Plan. The Head of Planning Strategy confirmed by way of an email on 24th June 2024 that *"the material that you have previously sent… fulfil the requirements in national guidance to enable its consideration within the Local Plan. This will be considered alongside… the wider evidence base and any relevant national legislation and guidance."*

Taking the above into account, it is necessary to consider the loss of this green space (and its value to biodiversity) against the provisions of an up to date development plan which in this case is policy JP-G6 of PfE). This policy requires existing green spaces to be protected and enhanced, as well as working with developers and stakeholders to deliver new urban green spaces. It is

unclear how the loss of a substantial amount of this existing natural greenspace could be considered to meet the aspirations of this policy. Beyond the simple policy tests, the space offers something entirely different, although complementary to the green space that is provided by Longford Park and the associated athletic facilities, that of a semi-natural space - a place to connect with nature. 25,000 people live within a 15 minute walk of Ryebank Fields, for the majority this is their closest natural space, an important distinction between the more formalised Longford Park. Considering the wider community's view and an increasing understanding of the importance of nature spaces to human health there are notable material considerations that indicate that a different approach – one that preserves the open space – should be explored.

Significant biodiversity and habitat impacts

The applicant's ecology report and consideration as part of the Environmental Statement for the site appears to be limited in both its scope and depth. It appears that the applicant has sought to 'play down' the site's biodiversity value and its importance as part of the wider local wildlife network. The Lancashire and Cheshire Wildlife Trusts and Friends of Longford Park have all made representations to the GMCA for Ryebank Fields to be included in the Local Nature Recovery Network (LNRN), both because of its value in its own right, and because of its ecological importance to Longford Park, which is already included in the draft LNRN as an Opportunity Area.

FoRF have over the years commissioned surveys by suitably qualified professionals. We attach the most recent and relevant of these, a PEA carried out by Stuart Spray Wildlife (2025). These reports have been supplemented with recording by local amateur expert naturalists. The PEA report commissioned by FORF demonstrates that the site contributes significantly to the wider area's biodiversity through its mosaic of woodland, hedgerow, grassland, and scrub habitats – all priority habitats within the GM Biodiversity Action Plan (GM BAP) and the Local Nature Recovery Strategy (LNRS), and all of which have self-regenerated since the playing fields were last mown in 1996. The report also notes that the site is home to a number of GM BAP and LNRS Priority species and nationally protected plants, birds and mammals, some of whose populations are in steep decline. The report furthermore recommends that in the long term, its biodiversity has the potential to be enhanced by a minimal, 'light touch' conservation and management approach.

The applicant's own PEA will expire on April 18th and by their own admission the data gathering has been in suboptimal conditions - it also excludes a number of desk based data sources. Their BNG calculations nevertheless identify that the development would result in a highly significant net 40% loss of biodiversity from the site. The approach proposed to achieve biodiversity net gain is to compensate for this loss through purchasing off-site credits at an unspecified location. This would result in a significant reduction in local biodiversity and this urban community's access to it.

FoRF acknowledge that an attempt has been made to retain some of the woodland and hedgerows to the north and the west of the site. However, the retention appears to be the minimum required to meet the Development Brief, with development abutting right up against

trees and ecological corridors – there is no feathered edge or buffer. The loss of almost all of the grassland and most of the scrub areas, to be replaced by hard surfacing and built form, is the key issue. Grassland is an important habitat for insects, butterflies, moths, and small mammals, and hunting grounds for bats and birds including raptors such as the Sparrowhawks and Tawny Owl. Scrub provides shelter for ground nesting birds such as the (red listed) woodcock, and mammals including badgers and foxes.

FoRF would also like to draw attention to broader concerns regarding the proposed management of the trees and habitats that would be retained on site. The management plan appears to be lacking the detail necessary for the proper protection of the habitats within an urban environment. It is not clear where the boundaries of the management regime would lie, and there would inevitably be conflict between residents and landlords, estate managers, park users, and nature enthusiasts, in balancing cost, security, access, and ideas about aesthetics and wildlife conservation. As an example, the cycling and walking corridor would be lit at night, and vegetation cut back to enhance visibility and reduce safety concerns – this would significantly undermine the habitat value of the retained western woodland corridor. There are several trees very close to roadways and houses that would very likely be lopped or felled for amenity, access, safety concerns or security reasons.

Collectively this demonstrates that even if the proposed loss of the habitats were deemed to be acceptable, the scale of the development crowds the edges of those habitats and undermines the quality and integrity of the remaining habitats and their potential to sustain wildlife. While other potential development sites exist not only within Manchester, but locally within Chorlton, that have significantly less of an ecological value, it is difficult to justify bringing forward this site and it runs counter to policies in PfE including JP-G6 and JP-G7.

Poor consideration of heritage impacts

In accordance with paragraph 212 of the Framework, great weight should be given the impact of proposed development on the significance of a heritage asset. The proximity to Longford Park and its conservation area, as well the site containing (in almost all likelihood) a remnant of the Nico Ditch mean that the LPA should be significantly concerned with potential heritage impacts. The FoRF are concerned that the proposals seem to partly
fills in the Ditch, builds houses on either side and a road and greenway either end, as well as using it as a balancing pond as part of the sustainable drainage feature – this is entirely inappropriate and would result in the complete loss of the significance of this heritage asset on the site despite the application purporting to leave a 10m 'no build' restriction zone around the feature.

The Friends of Ryebank Fields believe that the applicant's archaeological consultant, Wardell Armstrong, have consistently understated the importance of the Nico Ditch, with a number of reports suggesting the ditch may instead be the Carr Ditch. However, this claim does not appear to have been progressed further within most recent reports and, to the contrary, an article

prepared independently by Michael Nevell (*Nico Ditch: Investigating An Early Medieval Monument, 1883 to 2023*) only further substantiates the working understanding that the ditch within the site is the Nico Ditch.

The work that has been submitted by the applicant, despite feedback from Greater Manchester Archaeology Advice Service (GMAAS) during the EIA screening of the proposals there has still not been any archaeological investigation undertaken to understand the significance of the feature believed to be the Nico Ditch. Based on the recent research undertaken by Michael Nevell (an acknowledged expert on the Nico Ditch) and assuming the site is indeed the Nico Ditch as is expected, it shall be subject to possible scheduling and footnote 75 of the Framework is engaged. In this respect it should be treated as a designated asset. Historic England's response to an application in 2019 to designate the Ditch as a scheduled monument is of note in this regard as it states *"the site is clearly of strong local importance. If further investigations provide evidence of the site's potential national importance, then it could be reassessed for scheduling at that time"*.

Paragraph 11.7 of the Environmental Statement non-technical summary sets out the impacts for this feature would be 'preserved, with part of the ditch being infilled to create an ecological pond while the rest remains intact'. Preservation is clearly not achieved when looking at the layout proposed, with part of the feature buried to accommodate highways infrastructure, and the rest subject to significant modifications (the extent and details for which are not provided) in order to accommodate a drainage function. The lack of consideration of this feature, and the possible impacts of leaving investigations to a later date, have the potential to cause significant impacts on the development overall and heritage asset, especially given the lack of understanding of the asset's significance in the first place (see paragraph 207 of the Framework).

Turning to Longford Park Conservation Area, the park is the subject of a suite of improvements following Heritage Lottery funding, so needs careful consideration. The Longford Park Conservation Area Appraisal (section 3.3.2) refers to the '*wide open vistas particularly in the northern part of the park, which give a sense of space within a built up area'*. In this respect, the relationship of Ryebank Fields to the Park is very much part of these characteristics. The heritage assessment concludes that impacts on the Park are limited because of the raised bank and the mature woodland and hedgerow between the site and the conservation area. The visual impact on the Conservation Area is understated for a number of reasons which we outline here. The application's heritage statement states that the development is no more than two storeys high – other documents make clear that 96 of the 120 housing units are in three-storey buildings. Moreover – though not referred to in the statement - much of Ryebank Fields is over a metre higher than the adjoining Park, The woodland and hedgerow boundary referred to is identified within the conservation area appraisal for Longford Park (SPD 5.19A - section 2.67) as being an important historical boundary of the former Longford Estate, comprising trees and an Important Hedgerow (as identified by GMEU in 2021). The trees, vegetation and scrub extend seamlessly from within the conservation area into the Ryebank Fields site, and the proposed development seeks to further erode this boundary feature with footpath connections.
Whilst the tree belt to the north may to an extent screen the development (albeit much less so in winter), this is not the case with the southern end, where the tree cover is more sporadic and development (specifically the proposed autism friendly accommodation and its car parking area)

is almost right up to the boundary with the Park and the conservation area. It is considered that there would be visual impacts on the openness of the views within and from the conservation area to this boundary. The FoRF note the comments made by Trafford MBC in response to the Autumn 2024 consultation hosted by the applicant on this matter. In their response Trafford MBC raised concerns over the impacts on the open space beyond the conservation area boundary, and impact on the gateway to the park at this point specifically, where a new park entrance is proposed. The development proposals submitted do not seem to have addressed this concern in any way.

The heritage statement that has been provided by the applicant is actually very poor in considering either of the matters raised above. The report makes use of google street view images on some occasions and poor quality dark grainy images in others, to assess the visual impact of proposals – this is poor practice and is reflective of the quality of the report overall. It is unclear from reading the material whether the author has indeed been on site at all. In any regard approach to heritage appears to have – like other elements of the application – a light touch in nature and focuses on built heritage as opposed to other elements and does not afford, in our view sufficient significance to the heritage assets on and off the site and completely misjudges any visual impacts on these. In that respect it cannot meet the requirements of the Framework as outlined in paragraphs 212 – 221. In this respect, the quality of the conclusions will of course be the subject of detailed considerations with both conservation officers at Manchester and Trafford as well as GMAAS but on what has been provided by the applicant we would be significantly concerned with making a judgement on heritage impacts from the proposal.

<u>Unclear drainage strategy and impact on Conservation Area</u>

Whilst the applicant has submitted a drainage strategy for the site the FoRF are significantly concerned regarding both its accuracy and efficacy. For example, there are three different versions of the Longford Brook route across the site and into the Park within the document. The strategy makes clear that no final decision has been taken on how surface water will be managed from the application site but there is a preference for directing water to an existing culvert and then into a swale on land that would be within the Trafford MBC boundary within the Longford Park. Under the plans proposed by the works associated with the heritage Lottery Fund, the swale would be used partly to drain a well - whose inflows have not been determined - and directing water into Longford Brook. There are a significant number of unknown flows associated with the applicants' proposals and there is no evidence presented that the proposed development will not exacerbate rather than improve the Park's drainage issues.

Poor quality design response

Whilst the matters raised above have demonstrated the lack of overall consideration of a specific planning matter, it is when we considered these in the context of the layout proposed that the poor quality of the application becomes truly evident. The layout that is presented is poor quality urban design and fails in the most basic of ways – there are exposed rear gardens, excessive areas of hard standing, and pieces of green space that lack either a role, purpose or clear ownership. In fact, it exhibits many of the tenants of a 1960 Radburn style development that has caused so many issues for housing quality in the late 20th century.

Many of the buildings on the site, specifically the larger buildings of the co-housing, autism friendly housing and the over 55s housing appear to be less than effectively integrated into a network of clear streets and spaces and frontages. The whole site appears to be inward looking and does not appear to integrate into the surroundings. In fact, they appear to be arranged in ways which are almost certainly going to cause conflict between residents, visitors and those using the site as a through route for walking and cycling. Collectively the scheme fails to respond positively to its natural surroundings which conflicts with Manchester own Residential Quality Guidance but more specifically sections N1 and N3 of the National Design Guide.

As noted, the FoRF consider that the scheme fails to engage positively with the surrounding green infrastructure on the site – it has already been mentioned that the built form 'crowds the edges'. It is evident from the submission that the need to deliver a quantum and form of development that is marketable has been the driving force behind this scheme, almost certainly set out before the constraints of the site were fully appreciated, and the highways and circulation design have driven the site's layout. The desire to deliver a viable scheme has led inextricably to a poor-quality design proposal. In this respect this point offers further support for the views of the FoRF, and the community, that this is not the best use for this site – retaining it as green open space for community use is far more deliverable.

Impacts of access and parking is unclear

The site as present takes access from two points. This has been the case in all the iterations that we have seen during the consultation either by this applicant or MMU. However, this scheme seems to awkwardly limit the access that can be taken from the northern portion of the site leading to a complex and convoluted access and service arrangement. Indeed, it appears from the submission that this was in order to limit possible impacts on highways within Trafford. Regardless of the numbers coming from either a north or south access point the impacts on the surrounding traffic network will affect both Trafford and Manchester's Road networks given the way that traffic will disperse from either access point. In that respect it is a moot point and should be afforded limited weight.

Turning to the traffic flows themselves, these are considered to be significantly repressed by the transportation statement – the use of very old TRICS data from inappropriate sites, and the

assumptions made as to travel data for the non-market housing uses on the site all present a picture that is unlikely to occur in real life.

Trafford's roads already deal with regular episodic congestion and parking issues due to events, and all the neighbourhoods between Ryebank Fields and the Old Trafford Stadium and as far eastwards as Seymour Grove are subject to resident parking permits on event days because of the pressure for parking. The planned expansion of capacity at Manchester United football ground and other developments in the surrounding Civic Quarter and Longford Park will only increase these cumulative effects. Peak congestion and out of town traffic during events (football, cricket, gigs etc) are not typical of most other suburbs and we believe that the highway modelling which has been undertaken does not adequately capture this. Peak traffic flows could be somewhere in the region of 30 – 40% higher than predicted and more generally the modelling which has been undertaken is clearly inadequate.

Furthermore, we have already raised concerns over the suitability and effectiveness of the access route through the site and the hierarchy of the streets and spaces– the applicant's own assessment identifies issues of highways safety and access. The swept path analysis submitted with the residential scheme shows that the access point is very narrow. The Stage 1 Road Safety Audit (SA 4771) submitted by Waterman Aspen as part of Transport Assessment Vol. 3 of raises concerns over traffic safety and the risk of collision resulting from narrow turning points for large service vehicles that would have to drive on the wrong side of the road to turn (point 6.5). The roadways crowd the retained habitats and green infrastructure often with parking areas pushing into these areas as well as significantly impacting on the Nico Ditch through the creation of a north-south carriageway built to adoptable standards (see earlier comments).

Notwithstanding issues of layout and highways safety, there is also considered to be a significant under supply of parking on the site, especially for the affordable over 55s housing which is only provided with one space for every two units – this approach is considered completely inappropriate. This is well below the standards that would otherwise be required, and it is considered that this can only lead to 'fly parking' within the site and on the surrounding streets. All of this results in a significant increase in nuisance to surrounding residents, to the increase in possible road safety hazards to residents, school families and visitors to Longford Park.

Neither Longford Road (southern access) nor Rye Bank Road (northern access) are what would otherwise be described as suitable routes for new development to be located along. They both have cars parked continuously on both sides which means that the carriageway is restricted to less than 4 metres wide and have significant pedestrian traffic visiting the schools, Longford Park and other community uses including the local athletics club. Increasing traffic flows along this route will cause further disruption and road-use conflict. This further demonstrates the in-principle objection to this scheme which is that this is the wrong place for this development.

It is our understanding that residents from both Manchester and Trafford have repeatedly raised concerns with both Longford and Chorlton councillors around road safety, congestion, and parking issues over a number of years and have recorded numerous accidents. The highways

authority have been engaged with both sets of discussions, and recently released a report regarding the Kensington Rd / Oswald Road junctions that supports the use of traffic calming measures. Play streets or School Streets have historically been explored (most recently in 2022) but as we understand from residents were not recommended near St John's or on Oswald Road Schools, often due to carriageway constraints (length and narrowness, as there is insufficient room for cars to pass). In a leaflet from 2019, Cllrs John Hacking, Eve Holt and Matt Strong acknowledged the "already terrible traffic issues around the Longford and Ryebank Road areas".

Taking account of all of the matters raised above, the FoRF asks officers and members to carefully consider the traffic impacts not from a position of a simple highways capacity perspective but from a much wider road safety, liveability and promotion of active travel perspective. The negative implications of the development highlighted above clearly create a hostile environment for walking and cycling, further reducing the appeal of active travel. By contrast, the current opportunity to walk through a nature rich space with a sense of community is a positive incentive to travel on foot or by bicycle rather than by car.

Any decision relating to the highways impact of this development also needs to be taken in the context of the location of two nearby Primary Schools off Longford Road, the proximity of the athletics stadium and large municipal park (Longford Park) and a community already focused on improving active travel. This approach is in line with paragraph 109 of the Framework. Paragraph 110 also goes on to state that the planning system should 'actively manage patterns of growth to support these objectives." It is considered that to support this development, on that basis would be counter to the prevailing policy direction of the Framework.

Impacts on Air Quality

Air pollution is a great concern in the community as it can impact cardiovascular health, breathing, brain development and educational attainment and affect children's life chances. Despite the site itself not being within an Air Quality Management Area (AQMA), it is surrounded by them, the nearest being 100m to the North in Trafford. It is considered that construction dust, emissions from additional traffic, and operational phase impacts could be significant given the length of development and proximity to residential areas and school playgrounds, and the impacts may be such that they result in a material change in pollution levels within AQMA's which surround the site.

It is known that air pollution outside St Johns school is in the 85th percentile and described as "very high", with readings recorded at Oswald Road school even higher, placing this address in the 87th percentile.

Localised congestion on Longford Road and at times Great Stone Road (e.g. on event days which can be 3 or 4 times a week during the summer) increases these values and results in a community who are already unduly exposed to high levels of air pollution. The redevelopment of an existing

green space (vegetation has a measurable impact on improving air quality), and its replacement with a development which will result in a significant increase in localised vehicle journeys, will undoubtedly exacerbate this issue and this should be given weight within the planning balance.

Conflict with the 2019 development framework document

It has already been outlined that it is the view of the Friends of Ryebank Fields that the development framework for this site should be given little to no weight within the planning balance. However, this notwithstanding, or in the event that the decision-maker does not arrive at this conclusion, it should be acknowledged that the proposed development fails in any event to comply with some of the basic development parameters listed within the framework. This particularly includes the following:

- At page 52 of the development framework, it is stated that *"dwelling heights should predominantly be 2 storey, however a maximum height of 3 storeys may be justified"*. The design approach which has been progressed for this site proposes 3 storey buildings throughout the site with no justification provided as to why this form of development may be appropriate within certain areas of the site.

- The development framework requires a site layout and individual dwellings to promote activity and natural surveillance. The detailed assessment of the site layout provided within this letter clearly demonstrates that this has not been achieved.

- On page 53, the development framework states that the 'Nico ditch shall be retained and include the enhancement of ecological and landscape features'. Observing the design response proposed within this development, the Nico Ditch is to be filled, split by roads and cycleways which will cross above, and flooded. Based on this and the detailed assessment of the design treatment of the ditch included within this response, it is concluded that this existing heritage asset and wildlife corridor will not be retained in a manner which holds any of its existing historic, cultural or ecological value.

Based on the above it is considered that irrespective of the weight which the decision-maker may afford to the development framework, any assessment of the development relative to this will find that the scheme is in fundamental conflict with the parameters included within it in a number of ways.

Planning balance

It is clear from the paragraphs above that the negative impacts of this scheme are not outweighed by the benefits when considering the planning balance. Clearly the balance is not in

favour of this scheme in principle, and on matters of detail the scheme as presented is far from resolved with issues of heritage, ecology and design all being significantly wide of the mark. There is insufficient justification for the loss of the greenspace presented (either from a policy perspective or from a health and wellbeing perspective) and the applicant instead relies on the status of the Development Framework.

If Manchester were unable to meet their housing targets, or if PfE had not identified and allocated several sites across Greater Manchester then this situation might be different. In any case, in its current form there are a number of unanswered questions about this proposal and the evidence on which it is based, all of which need to be addressed by the Local Planning Authority.

Having considered all of the above it is considered that this planning application should be recommended for refusal to the planning committee, who will undoubtedly be responsible for making the final decision on this site. Should you have any questions or queries regarding this submission, or the points raised, I would be happy to speak with you – please do contact me by email (bob@urbanimprint.co.uk) or telephone (01625 265232).

Yours sincerely

Bob Phillips – on behalf of members of the Friends of Ryebank Fields
MTCP(Hons), MA(Urban Design), FRTPI
Director, Planner and Urban Designer

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Encs: Representation made to Trafford MBC on application 115688/FUL/25

EIA screening response, Local Green Space justification and Preliminary ecological assessment

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Sarah Lowe
Major Planning Projects Manager
Trafford MBC
By email to: Sarah.Lowes@trafford.gov.uk

Date: 31st March 2025

Our Ref: 23-009-ltr-002

Re: Representation against application 115688/FUL/25 'Engineering operations to create vehicular access to serve residential development (within Manchester City Council's administrative boundary) comprising 120 and other associated works at Ryebank Fields' on behalf of the Friends of Ryebank Fields (FoRF).

Dear Sarah

Please find below in response to the above planning application, a representation made on behalf of the Friends of Ryebank Fields group.

A separate representation has also been made on behalf of the Friends of Ryebank Fields group to Manchester City Council (MCC) regarding application 142223/FO/2025 (MCC reference). This letter has been attached as an appendix for completeness.

This letter sets out an objection to the following elements in detail: the lack of clarity in the validity and approach of this application; its legal implications - particularly regarding the Asset of Community Value (ACV); the impact that the development will have on Trafford's local highways network due to the increase in traffic flows into and through Trafford; and concerns regarding the quality of the reports that accompany the planning application. These are all matters which Trafford Council, as the local planning authority responsible for the determination of this application, will need to consider in detail and determine a level of acceptability in each regard.

Objection to the principle of the development proposal

Application 115688/FUL/25 made to Trafford Council is fundamental to the larger scheme submitted to MCC (MCC reference 142223/FO/2025) as it seeks to provide the northern vehicular access route to the site from Rye Bank Road, which would serve 9 houses and 22 apartments on the north side of the site. Therefore, this smaller application to gain permission for the northern access point is intrinsically linked to the wider and larger scheme submitted to MCC, and both applications should be considered together. This section will briefly set out the elements of the larger scheme for 120 dwellings that this statement objects to in principle, discussing each element in detail.

Housing supply: the lack of contribution to Trafford's housing needs

The proposed development would not contribute to Trafford's housing needs, and instead the housing supply created by the scheme would benefit Manchester City Council.

As addressed in more detail in the representation submitted to MCC, sub-regional policy and the MCC development plan outline that South Manchester is not an area of focus for new housing development. This underlines that the development and intensification of the greenfield site is unnecessary and ill-suited to the surrounding context.

Impact to the setting of Longford Park Conservation Area

We find that the impact on the heritage setting of Longford Park, which is within Trafford's authority, has not been sensitively or adequately considered as part of the proposed plans.

Policy R1 (Historic Environment) of the Trafford Local Development Plan outlines that: "All new development must take account of surrounding building styles, landscapes and historic distinctiveness". Paragraph R1.2 highlights that "developers must demonstrate how the development will complement and enhance the existing features of historic significance including their wider settings, in particular in relation to conservation areas".

The proposed development would be adjacent to the eastern edge of Longford Conservation Area and the proposed development of the site would greatly impact the wider setting of the heritage asset by changing and minimising the vegetated and spacious setting.

Furthermore, there are concerns that the three storey units proposed will be built on higher ground and therefore have an overbearing visual impact on the heritage asset of Longford Park and its setting. Section 3.3.2 on page 10 of the Longford Conservation Area SPD 5.19 describes "wide open vistas, particularly in the northern part of the park, which give a sense of space within a built up urban area". The proposal would erode this sense of space. Section 2.67 of the same SPD notes that mature trees are very important to the character of the Conservation Area, and that the carefully planted 'landmark' trees are particularly significant. This includes the 'Important Hedgerow' on site identified by Greater Manchester Ecology Unit in 2021 which contributes to this special character.

The loss of natural green space

The proposed development which would be facilitated by this application for the northern access route would result in a significant loss of green space, biodiversity, and natural habitats, which are currently enjoyed by communities residing in Trafford.

The biodiversity report submitted as part of the main development proposal found that the proposal would result in a net 39.95% area of habitats and net 81.13% of watercourse habitats would be lost. This figure not only signifies the major loss that would result from the development, but also the concentration of biodiversity habitats that the green space provides in its current setting. One member of the community highlighted that "Manchester lacks green

space and places where natural habitat for wildlife is untouched" and another resident noted that "The area has provided a natural classroom where both my children and grandchildren have learnt much and come to appreciate the wonders of nature". We draw attention to the point that the green space and natural habitats which this site offers has a nature offering that is scarce across the rest of the Manchester area, which threatens being erased if the scheme comes forward.

The Trafford local development plan sets out in policy R5 (Open Space, Sport and Recreation), that LPAs should be concerned with "Protecting existing and securing the provision of areas of open space and outdoor sports facilities;". R5 also recognises that: "Green spaces are important to local communities. The availability of open space, sport and recreation facilities are key factors to the quality of life and physical well-being of people".

Places for Everyone (PfE) outlines in JP-G6 Urban Green Spaces that "existing urban green space will be protected and enhanced in balance with other considerations".

In light of both R5 and JP-G6 above, we find that the proposed residential development that this application would facilitate would result in the loss of a valuable open green space. The removal of the green space would result in a degradation of the space at Longford Park due to the rich biodiversity present at Ryebank Fields. Loss of this space is not in line with local policies and aspirations to protect and enhance green spaces and to designate Longford Park as an Opportunity Area in the Local Nature Recovery Strategy. As acknowledged in the local development plan, the loss of green space will negatively impact the well being of the local community.

It is clear from the community consultation report that the local community has already brought forward their objection and indicated a strong negative response to the proposed residential development that this application would facilitate. In the Statement of Community Involvement submitted with the above application produced by Step Places, Southway Housing Trust, and Manchester Metropolitan University, 77.6% respondents out of a pool of 975 said that they opposed the scheme overall (Page 12). We underline that the community feedback has largely not been used to inform the scheme.

Overall, it is unclear what benefits Trafford gains as a local authority if the scheme is brought forward.

The removal of an Asset of Community Value (ACV)

Leading on from the loss of valuable green open space, this letter turns to the loss of a designated Asset of Community Value (ACV) that the proposed northern access point will directly remove.

The proposed northern access route would result in the removal of a designated Asset of Community Value that currently benefits communities living within Trafford's local authority boundary. The area is currently a community garden space, which was created by local people as a community facility, an events venue and a meeting point. This space has intrinsic value as

a social space that connects the communities of Chorlton and Old Trafford. This statement supports the representation from the Ryebank Residents Association in this regard.

As discussed in more detail in paragraphs below, we find that the LPA should provide more clarity regarding how it will handle the loss of this ACV transparently, particularly regarding legal matters and ownership.

The increase in traffic flow into Trafford

It is clear that the large residential scheme submitted will benefit MCC in terms of housing supply albeit at the cost of loss of a significant proportion of South Manchester's limited natural amenity space. However, the other elements of the proposal detract from Trafford's assets, including the conservation area of Longford Park, the green space and biodiversity value, and the ACV. Adding to this, the traffic increase resulting from the proposed development would worsen traffic flows into Trafford, creating congestion and adding public nuisance and conflict to already busy roads. These roads are commonly hostile to cyclists and the aims of active travel as they have no bike lanes and parking on both sides. We find that the traffic report submitted alongside the above application underestimates the increase in traffic flow into Trafford, and overall, it is unclear how the above application for the northern access point, which serves the larger scheme submitted to MCC, generates any benefits to Trafford local authority or communities living in Trafford.

To emphasise this, we highlight Paragraph 39 of the NPPF, which states that "Local planning authorities should approach decisions on proposed development in a positive and creative way." We find that the application for the northern access point would not prove to be a positive approach to development providing that it would negatively impact the local community by removing a valuable open green space and ACV, as well as directly increasing traffic flows into Trafford.

Collectively, these elements cumulate in a matter that should be afforded significant weight in the planning balance of this application, especially given that the northern access that is sought through this application is fundamental to the facilitation of the larger scheme.

Detailed comments on application 115688/FUL/25

This part of the letter will provide a detailed discussion on the points raised above, with references to planning policy and work submitted as part of the above application.

The Asset of Community Value (ACV)

Paragraph 96 in the NPPF outlines that planning decisions should "promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other". This statement asserts that the existing community garden functions

as a valuable space where people from different communities and cultures meet, socialise and connect.

In addition, paragraph 98 in the NPPF outlines that planning decisions should aim to achieve healthy, inclusive and safe places which "plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments".

The existing community garden provides a shared space and community facility that is key to prolonging the sustainability of the local community. The space was built by the community and is an important part of their local sense of ownership, evidenced by how well maintained the space is. This application which seeks permission for a northern access point will remove the community garden. We find that this will be detrimental to the surrounding neighbourhood by erasing a popular and free meeting place where local residents meet, interact and host events.

We recognise that the application proposes the provision of community spaces in the development in the form of a community hub, village green and community garden (as shown in 5.6 Greenway in the Design and Access Statement). However, we highlight that the on site replacement will not be within Trafford, and it will not be able to replicate the community value of the existing ACV. It is clear from the community responses included within the submitted Statement of Community Involvement (as part of Objection: Other – Community Garden, page 38), that local residents object to the removal of the ACV. One response from a resident on Longford Road in particular articulates this clearly:

"Currently the design includes access through Trafford Rye Bank Road. This cannot happen. We have a community garden that has been awarded Asset of the Community status. This garden is not only important for the social well-being and interests of the immediate community but also serves many others who come to visit with their dogs, borrow books from our mini library, meet friends, enjoy listening to the birds and watching the wildlife. We have a summer and winter street party every year, centred around the community garden. These are important days when we all come together, people that have lived here for fifty years and new arrivals, to celebrate together. I know this has had incredibly positive effect on how close we all feel. This would be impossible without our garden and if the road extended further."

Overall we do not find the provision of new community facilities an appropriate solution to the loss of the ACV. The removal of the community asset would amount to an irreplicable loss for local residents, as the community gardens provides a facilitator for meeting people and forming a sense of community, which overall help to provide a unique space that helps to generate a sense of belonging and 'ownership'.

The loss of biodiversity

The applicant's ecology report and consideration as part of the Environmental Statement for the site appears to be limited in both its scope and depth. It appears that the applicant has

sought to 'play down' the site's biodiversity value and its importance as part of the wider local wildlife network. The Lancashire and Cheshire Wildlife Trusts and Friends of Longford Park have all made representations to the GMCA for Ryebank Fields to be included in the Local Nature Recovery Network (LNRN), both because of its value in its own right, and because of its ecological importance to Longford Park, which is already included in the draft LNRN as an Opportunity Area.

FoRF have over the years commissioned surveys by suitably qualified professionals. We attach the most recent and relevant of these, a PEA carried out by Stuart Spray Wildlife (2025). These reports have been supplemented with recording by local naturalists. The PEA report commissioned by FORF demonstrates that the site contributes significantly to the wider area's biodiversity through its mosaic of woodland, hedgerow, grassland, and scrub habitats – all priority habitats within the GM Biodiversity Action Plan (GM BAP) and the Local Nature Recovery Strategy (LNRS), and all of which have self-regenerated since the playing fields were last mown in 1996. The report also notes that the site is home to a number of GM BAP and LNRS Priority species and nationally protected birds, mammals and plants, some of whose populations are in steep decline. The report furthermore recommends that in the long term, its biodiversity has the potential to be enhanced by a minimal, 'light touch' conservation and management approach.

The applicant's own PEA will expire on April 18th, and by their own admission the data gathering has been in suboptimal conditions - it also excludes a number of desk based data sources. Their BNG calculations nevertheless identify that the development would result in a highly significant net 40% loss of biodiversity from the site. The approach proposed to achieve biodiversity net gain is to compensate for this loss through purchasing off-site credits at an unspecified location. This would result in a significant reduction in local biodiversity and this urban community's access to it.

FoRF acknowledge that an attempt has been made to retain some of the woodland and hedgerows to the north and the west of the site. However, the retention appears to be the minimum required to meet the Development Brief, with development abutting right up against trees and ecological corridors. The loss of almost all of the grassland and most of the scrub areas, to be replaced by hard surfacing and built form, is the key issue. Grassland is an important habitat for insects, butterflies, moths and small mammals and hunting grounds for bats and birds including the Sparrowhawks and Tawny Owl. Scrub provides shelter for ground nesting birds such as the (red listed) woodcock, and mammals including badgers and foxes.

FoRF would also like to draw attention to broader concerns regarding the proposed management of the trees and habitats to be retained on site. The management plan appears to be lacking the detail necessary for the proper protection of the habitats within an urban environment. It is not clear where the boundaries of the management regime would lie, and there would inevitably be conflict between residents and landlords, estate and park managers, park users, and nature enthusiasts in balancing cost, security, access, and ideas about aesthetics and wildlife conservation. As an example, the cycling and walking corridor would be lit at night, and vegetation cut back to enhance visibility and reduce safety concerns – this

would significantly undermine the habitat value of the woodland corridor bordering Longford Park.

Collectively this demonstrates that even if the proposed loss of the habitats were deemed to be acceptable, the scale of the development crowds the edges of those habitats and undermines the quality and integrity of the remaining habitats and their potential to sustain wildlife. While other potential development sites exist not only within Manchester, but locally within Chorlton, that have significantly less of an ecological value, it is difficult to justify bringing forward this site and it runs counter to policies in PfE including JP-G6 and JP-G7.

Ownership and legal implications

This section of the statement will draw attention to the legal implications that would result from gaining permission for the northern access point, removing the community garden.

The land north of the site has no known owner. The community garden was designated as an Asset of Community Value on the 20th of May 2021, and will expire on the 19th of May 2026. The Residents of Ryebank Fields group are custodians of the ACV.

Given the ACV designation, and the lack of registered ownership of the land north of the site which the above application is concerned with, we find that the application will result in complex legal implications due to uncertainty over ownership of the land. These matters could be further complicated if the ACV status needed to be renewed, leading to more uncertainty. The ACV's status may require the LPA to go through the appropriate legal process to ensure that the local community have the opportunity to purchase the site. It would be appropriate for the community to be given first refusal on purchasing, owning and managing the land. We find that if the application comes forward, the local authority are at risk of not following the appropriate legal processes attributed to the piece of land.

We emphasise that the local authority should clarify the legal implications that would result from gaining permission for the northern access route which would result in the removal of the existing community garden. On top of this, the local authority should ensure that the legal process is transparently considered and shared with the owners of the ACV.

Traffic impact

As mentioned in the above paragraphs of this statement, the proposed development of 120 dwellings associated with the northern access point will result in an inappropriate increase in traffic flows into Trafford.

Although the proposal provides two access points, one on the southern side and one on the northern side, we find that the traffic flow chart indicates that cars leaving the site will still travel north and add to the traffic on Rye Bank Road. Ultimately, both access points result in an increase in traffic in Trafford and the FoRF have concerns about the long term sustainability of the 'no through' route.

The flow of traffic out of the site will directly impact Rye Bank Road to the north of the site. Although the traffic reports submitted alongside the above application find that local roads have the capacity to deal with the increase in traffic flow, we find that the report underestimates the number of car users that would leave the site, and the amount of traffic at peak times that would travel along Rye Bank Road.

The swept path analysis submitted with the residential scheme shows that the access point is very narrow. The Stage 1 Road Safety Audit (SA 4771) submitted by Waterman Aspen as part of Transport Assessment Vol. 3 of raises concerns over traffic safety and the risk of collision resulting from narrow turning points for large service vehicles that would have to drive on the wrong side of the road to turn (point 6.5). We are yet to find evidence that the proposed scheme has addressed these safety concerns.

Rye Bank Road is a narrow road where many of the houses do not typically have space in their plot for car parking in the front driveway. This has led to an already narrow road which becomes scattered with chicanes because of extra cars parked on the side of the street. Understandably, this results in nuisance, road rage and conflict, particularly during peak hours. Despite the traffic report finding that the road has the capacity to deal with extra vehicles, funnelling more cars into this narrow road will result in more conflict between residents, and for this reason we find that the current solution is inappropriate and will not positively impact the community living in Trafford.

While we recognise that the traffic impact may not provide enough weight to be considered a reason for refusal, we ask officers to consider holistically whether the proposed routes are appropriate to take on additional traffic, instead of questioning whether they "can" or solely if they have the capacity to.

Parking

The proposed development has not provided sufficient car parking for age friendly housing, which represents houses for residents aged 55 and above. We find that this provision grossly underestimates the car use of older populations.

We also highlight that the Traffic Assessment Vol.4 illustrate that TRICS data gathered between 2000 and 2022 and 2015 and 2022 (as shown in Transport Assessment Vol.4) in sites around the UK has been used to inform the scheme and estimate car use and traffic flow calculations. Not only are these figures outdated, they fail to consider different populations and different car users. Traffic Assessment Vol.4 shows survey data collected broadly collected from "Retirement Bungalows, Retirement Flats," from a range of years from 2008 to 2021 in areas such as Glasgow and Halifax. This narrow use of data has also been used to inform the parking provision on site. In the proposals, the parking provision for 'age friendly' apartments group older populations into one road user, and so there is no deviation in car use between 55-65 or 90+ year olds accounted for. In the proposed development plans, paragraph 1.20 in Traffic Assessment Vol. 3 shows that 11 parking spaces have been provided in 'Age Friendly North", which serves 22 residential units. In 'Age Friendly South', 10 parking spaces are

provided for 20 units. The lack of car parking provided on site would mean that the development would result in overspill car parking on to nearby streets, including Rye Bank Road.

This once again highlights why the proposal does not result in any benefits to the LPA, and in fact detracts from the local community residing in the LPA by adding to congestion and on street car parking.

Lastly, drawing SK22351-211 in Transport Assessment Vol. 2 submitted alongside the larger scheme illustrates that the road leading from Rye Bank Road and the northern access road into the site is unadopted. Again, we find that the LPA should clarify how this road will be managed and maintained.

Drainage

We have concerns regarding the submitted Drainage Strategy and the report contains errors. For example, there are three different versions of the Longford Brook route across the site and into the Park. The report states that the Head of the Brook is in the Park when it is in fact several miles east. The strategy makes clear that no final decision has been taken on how surface water will be taken off the Fields. Preference is suggested to directing water to an existing culvert and then into a swale, all on Trafford land. Under Lottery plans, the swale would be used partly to drain a well - whose inflows have not been determined - and directing water into Longford Brook. As the well inflows are unknown, Trafford have been unable to prove the swale (never intended to take water from Ryebank Fields) will not exacerbate rather than improve the Park's drainage issues.

In summary, we find that there lacks a convincing justification for the wider residential scheme to come forward, and less justification for granting permission for the northern access point. We therefore respectfully request that this application is refused. Should you have any questions or queries regarding this submission, or the points raised, I would be happy to speak with you – please do contact me by email (holly@urbanimprint.co.uk) or telephone (01625 265232).

Yours sincerely,

Holly Rodger – on behalf of the Friends of Ryebank Fields
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RESPONSE TO EIA SCOPING REPORT REF: **EIASCO/24/006**

Submitted by: FRIENDS OF RYEBANK FIELDS 17th December 2024

Overall comments on structure and content of the Scoping report:

We acknowledge that Ryebank Fields is a complex area of land with a layered and continually evolving history. Some assumptions seem to have been made in the absence of clear evidence, and there is a lack of reference to, or knowledge of, some important cross boundary issues. The level of investment of the surrounding and wider Ryebank Fields community in our care for and attention to the Fields and their current inhabitants is also not visible in the current report. We hope our following comments are helpful in drawing your attention to some of those aspects.

It's important to highlight that the scoping report relies in many places on a number of reports dated from 2023 and 2024 which haven't been released. We are concerned that it cannot be possible for officers and consultees to confidently form an opinion on scoping without seeing this evidence base.

Chapter 2 Topics to be scoped in

'Table 2: Summary of Proposed ES Scope' does not map against its own Chapter structure, with the result that a number of topics, both scoped in and out are buried within their chapters. Transport and Access does not appear at all on the table. This has the effect of making the report somewhat opaque at first pass, but it looks as though all the relevant content is included.

Chapter 3 EIA Methodology

Paragraphs 3.12 and 3.13 – Other Existing and/or approved Projects

The report excludes a number of relevant forthcoming developments which, given their scale and timing, we consider would contribute to cumulative effects.

Within less than 1km / 10 mins walk and of significant scale:

- Chorlton Baths (approved, demolition on site) 50 affordable residential apartments **136791/FO/2023**
- Albany Road 40 residential apartments (approved) **136878/FO/2023**
- Longford Park 'People, Place and Nature' project – a £6M package (including £3M Lottery Funding) of improvements to neighbouring Longford Park, includes de-culverting of Longford Brook, improved facilities. **PA 110093/FUL/23**
- Chorlton Place Development has been consulted on and the Precinct closed and boarded up pending submission of a planning application by PJ Livesey and GMPF. An application for demolition of the buildings on site has been received **141706/DEM/2024**. Given the strategic importance of the interested parties and the site itself, the plans for c**200** homes plus 12,500 sq ft of retail space there also would seem 'reasonably forseeable'
- Former B&Q site adjacent to Lancashire Cricket Club, **204 apartments** plus leisure facilities, see **111673/DEM/23 for more details**
- Brixham Road **114228/FUL/24** residential-led mixed use scheme comprising 145 homes, a commercial unit, communal amenity space, car parking and landscaping.

Within 2km and either of significant scale or similarity in market delivery:

- Trafford Wharfside Masterplan will deliver up to 5,000 new homes and associated retail and leisure space. It is being brought forward in a Partnership including Trafford Council GMCA and Manchester United, and the Masterplan has just been to Public consultation - so these proposals fall within the definition of 'reasonably forseeable'. The additional capacity of the

new Manchester United Stadium will have a significant impact on traffic, parking, footfall and other associated impacts in the surrounding areas, including Ryebank, Longford, Copley and Rye Bank Roads.
    - Includes **114818/FUL/24 1 Trafford Wharf Road** – a residential-led mixed use development, comprising 438 dwellings, purpose built student accommodation comprising 419 bedrooms, 2500 sqm of office, academic and commercial floorspace
- Lacy Street **114329/EIASCR/24** circa 53 dwellings ranging from two-bedroom apartments to four-bedroom family housing with 25% Affordable Housing across the scheme

Chapter 4 Site Description

General comment:

The site description and identification of constraints do not appear to adequately reflect the complexities of the site, and in particular its situation on the Trafford boundary. The interrelated cross thematic impacts on Trafford seem to have been inadequately recognised.

Response to Sections:

*4.1 The location and extent of the site is shown on the Site Location Plan provided at **Appendix 1**. The site lies within the administrative authority of MCC.*

This statement is **incorrect**. Parts of private gardens, Highway, and the Community Garden/ACV lie within the Trafford administrative boundary.

4.6 The site is not within an Air Quality Management Area (AQMA), however at its closest point, the Manchester City Council AQMA is approximately 200m north of the site.

This statement is both **inconsistent** with Para 10.22, and **incorrect**. The closest Manchester AQMA is approx. 200m to the South on Edge Lane, not the North as stated. Closest to the North is the Trafford AQMA, approx. 100m from the edge of the Fields.

4.7 The site is entirely within Flood Zone 1 from river and sea flooding. The site is predominantly at no risk of surface water flooding, however there is a linear strip through the centre of the site which is between low to high risk, which is associated with the Nico Ditch.

We dispute the assertion the site is at predominantly no risk of surface flooding, when even with the current levels of vegetation there is considerable standing water on site after rain. The site and the surrounding roads, gardens, park and cellars of houses surrounding the Fields regularly experience considerable pluvial flooding, reflected in Environment Agency mapping. See section 10. We also have a bank of photographic and video evidence and testimonials from neighbours to this effect. Many households have had pumps fitted by United Utilities.

The remediated 'cap' means that the Fields are a metre or two above the surrounding houses, this may also affect the hydrology and how any development would impact the surrounding area.

4.8 There are two Scheduled Monuments within 5km of the site, the closest being Section of an early medieval boundary ditch known as the Nico Ditch in Platt Fields 480m SSE of Platt Hall, approximately 4.2km east of the site.

There is strong evidence that the Nico Ditch referred to in this paragraph runs through the Fields themselves – see comments on Chapter 10 and section 4.4.2 of the **Longford Conservation Area Appraisal.** Longford Conservation Area is immediately adjacent to the site and shares a boundary and also many ecological features, including Veteran Trees, Important Hedgerow, and wildlife corridors.

Other important aspects not highlighted here:

Stage 1 of the GM Ringway footpath passes through neighbouring Longford Park about 100m to the left, this path is also a cycle route marked on Manchester Cycle Map number 8

The culverted Longford Brook is known to run across the site, and is designated as a 'main river' by the Environment Agency a short distance to the west in Longford Park. There is a plan to 'de-culvert' it through the Park as part of a much larger Park improvement scheme.

Chapter 5 Proposed Development and alternatives

General Comment: It's unclear what parameters will be set around this consideration of alternatives. The EIA should incorporate an assessment of alternatives that could attempt to respond to some of the key ecological, climate, flooding, contamination, traffic and heritage concerns; for example, developing only either the North or South portions of the site (to preserve the Nico ditch) or following the current street line and developing only the area of hard standing along the Longford Road boundary.

Chapter 6 Planning Policy Context

6.3 The Ryebank Road Development Framework, which was approved by Manchester City Council in 2019, does not form part of the Adopted Development Plan but will be an important material consideration in the determination of the planning application

Ryebank Road Development Framework was mostly developed in 2016/7 and based on work that preceded that, almost a decade ago now. FoRF continue to reject it as deeply flawed, and based on at the time incomplete, in some cases erroneous, and now significantly outdated information.

There are also other new material considerations that are relevant:

- The adjacent Conservation Area Appraisal for Longford Park,
- The NPPF Dec 2024 and the NPPG
- The emerging Local Plan due for schedule 18 consultation this Spring
- GM Draft Local Nature Recovery Network

Chapter 7 Ecology and Arboriculture – In Scope

7.1 Relevant Guidelines - In addition to those listed we recommend referral to:

- The Bird Survey & Assessment Steering Group (2024) Bird Survey Guidelines for assessing ecological impacts should be referred to.
- Draft GM Nature Recovery Strategy – currently out to consultation. There is a strong argument for the inclusion of Ryebank Fields as a high quality nature space within that Network, which includes wildlife corridors North /South and East / West, and that supports the ecology of neighbouring Longford Park (which is included in the draft Nature Recovery Network).

7.11 The majority of the site was defined by a large parcel of other neutral grassland (g3c) that spanned much of the site's central habitat

The loss of this grassland would have significant socio-economic, landscape and visual, material asset, and flood risk and drainage impacts (see relevant sections) and should be linked to those in the ES.

7.13 The arboricultural survey assessed a total of twenty-seven individual trees, twenty-six tree groups, and four woodlands (Urban Green, 2023a).

Without sight of the reports themselves, it's difficult to comment, but the Aspen Grove is a notable tree formation and habitat, Aspen stands can be of significant biodiversity importance playing host to up to 50 moth species, including micromoths and Aspen Hoverfly, a UKBAP flagship endangered species found in older stands of Aspen. Many of these species requires a minimum size and age of Aspen to survive, constraining the size combined with proposed encroachment, disturbance,

overshadowing and other effects could likely render the habitat permanently unable to support this nationally threatened species.

7.15 *A desk study exercise conducted as part of the arboricultural survey confirmed that no Tree Preservation Orders (TPOs) are present within the site extent and the site does not fall within a conservation area.*

The site is immediately adjacent to the Longford Conservation area. The **Longford Conservation Area Supplementary Planning Document SPD 5.19A section 2.67** notes that mature trees are very important characteristics of the Conservation Area, and in particular that the carefully planted 'landmark' trees which border the proposed site are significant and would of course be protected as part of that area.

7.18 The BNG assessment was conducted in October 2023 using the Statutory Biodiversity Metric to calculate the existing biodiversity habitat units of the site.

Two issues with this are:

- The latest version on the tool, dated 23.07.2024 should be used.
- This won't take account of any of the 2024 surveys so will be out of date and using incomplete information.

7.20 The site has a high baseline unit for area habitats, which is largely due to the site being comprised of medium distinctiveness habitats which are predominantly in moderate condition. The baseline unit value for hedgerow and watercourse habitats is comparatively low as fewer of these habitats are present (Urban Green, 2024d).

Good to see the acknowledgment of the high baseline biodiversity. But the value of some of the hedges seems to have been downgraded compared to the 2020 surveys which labelled some hedges on the Eastern boundary as "Hedge with Trees species Rich" and the semi-improved grassland area in the South West corner has been ignored (Ascerta Preliminary Ecological Appraisal June 2020) which may underplay the ecological value of the site.

7.28 A minimum of five bat species were recorded utilising the site extent, however bat activity was dominated by common pipistrelle (Pipistrellus pipistrellus), with only occasional occurrences of soprano pipistrelle (Pipistrellus pygmaeus) and rare occurrences of brown long-eared (Plecotus auritus), Myotis sp., and noctule (Nyctalus noctula) (Urban Green, 2024c).

Brown Long Eared bats are sensitive to light and will not leave the roost if the light levels are too high – the impact of lighting is currently out of scope, but the lighting guidelines quoted do not take account of specialist approaches in nature sensitive areas. The EIA might consider the cumulative effects of lighting alongside other factors such as loss of grassland where invertebrates breed, disturbance or removal of trees and dead wood, standing or otherwise.

The section on *Potential Effects starting 7.31* does not include a consideration of impact on the 'Other Neutral Grassland' which the surveys found to be the majority habitat – and is also the habitat which would be most impacted by the proposals, as it would be mostly if not completely lost to the development. It is important to consider the local and wider effects of this, as the grassland is a key foraging habitat for many species who live on site such as the Sparrowhawks and Crows, and for visiting and migrating bird species including Swifts, Redwing, Tawny Owls. The Grassland is also a key feature of the landscape enjoyed both visually and for its amenity and nature connection (pollinators are observed and enjoyed here throughout the spring and summer months).

7.49 The Proposed Development may result in the loss of potential roosting sites and foraging areas. Furthermore, in the absence of mitigation, felling of trees on site could result in the killing and injuring of individual bats.

This should read, “WILL result in the loss…” – we know bats, like owls and other birds, forage over the extensive grassland areas.

7.51 All active bird nests are protected through the WCA (1981) making it an offence to intentionally damage or destroy a bird nest when in active use.

This should include ‘or kill, Injure or take a wild bird or its eggs’ for completeness as it’s not just the nests that are protected.

7.52 Habitats on site such as mature trees and scrub were assessed as suitable to support common birds species in a nesting context. Ground nesting behaviour was ruled out due to the visitor pressure (Urban Green, 2024e). The Proposed Development may lead to the direct loss of suitable nesting habitat and potential nest sites of common bird species.

We disagree with the assertion that current levels of visitor pressure rule out ground nesting behaviour. Chiff Chaff are ground nesting birds and there are several breeding territories throughout the site. Nesting behaviour is observed frequently on any given day through the nesting season, particularly in areas of scrub. Dunnock, Song Thrush (both on the most recent BoCC Amber List), and Goldfinch are also present. The areas of scrub and woodland are currently sufficient and visitor pressure low, although of course the impact of loss of most scrub and the addition of 120 households and associated formalised footpaths and roads will significantly increase this pressure, which could be further multiplied by increased visitor numbers to Longford park. **Therefore, the Proposed Development WILL lead to the direct loss of suitable nesting habitat and potential nest sites of common bird species.**

7.53 In the absence of mitigation, it is likely that there would be an impact to breeding birds in the form of damage or destruction of active bird nests. For that reason, impacts to breeding birds are scoped in for further ecological assessment.

Should include ‘and also loss of foraging habitat, particularly for those who forage on grassland for grass seeds, invertebrates, and small mammals’. Nesting birds include Sparrowhawks and possibly Tawny Owl (the latter heard and observed on a number of occasions over the last two years).

7.55 [Confidential information relating to badger setts redacted].

7.56 In the absence of mitigation and licencing, there is a risk that individual badgers may be impacted by the Proposed Development through direct killing and injuring during the construction phase of the Proposed Development. Therefore, badgers and their setts are scoped in for further ecological assessment.

Obviously, it is difficult to comment without seeing this redacted information. We strongly advocate for a methodology that assumes a likelihood of additional sett entrances in areas as yet hidden by scrub, and that local knowledge is directly sought to avoid a repeat of the near miss that took place in June where only the intervention of the community prevented disturbance of a breeding sett.

7.57 Common amphibians (such as common toad, common frog) may be present on site, however, their legal protection status (under the WCA 1981) protects them from sale only.

Should read, ARE present on site

7.67 Losses with respect to priority habitat broadleaved woodland will be considered in detail as part of the Biodiversity Net Gain – Design Stage assessment. For this reason, losses will be adequately compensated for; likely within offsite locations or via the purchase of BNG credits from a regional habitat bank.

The authors haven't quantified the loss of biodiversity but do acknowledge for the first time, that the development would lead to a **loss of biodiversity on the site**. This net loss would have a significant impact not just on the local and neighbouring ecology, including that of neighbouring Longford Park (which is identified as an Opportunity Area in the draft Local Nature Recovery Network) but also on socioeconomic and health factors and their status as material assets - given the social, cultural and health value of Ryebank Fields to thousands of local people (detailed in the Local Green Space application, first submitted in 2020 and 'validated' by Manchester City Council planners in summer 2024).

7.68 Tree climbing surveys and/or dusk emergence surveys will likely be required prior to the felling of some trees identified as having the potential to support a bat roost. Moreover, other trees with a lower likelihood of bat roosting potential will only require a check by a suitably qualified ecologist to guide felling works.

We strongly advocate that officers request a Tree climbing Survey, as ground based surveys can be hindered by leaf and ivy growth (plentiful on older trees at Ryebank Fields) obscuring potential roosts. During dawn and dusk, this difficulty is further compounded by low light levels.

The bat species found at Ryebank Fields are known to exhibit roost switching behaviour. Bats may not be present in a particular roost on the night of the surveys, but in another roost elsewhere. Climbing allows the surveyor to be more likely to identify a roost. If a bat is not present, it is possible to confirm that bats use the roost by the presence of bat droppings. The species can be identified through DNA analysis. If a bat is present, it is of course possible to identify the species in situ.

7.70 It is likely that timing of vegetation or tree felling works outside of the core nesting season (i.e. undertaking the works between September and February) will be sufficient to avoid impacts to commonly occurring bird species. In the event this is not feasible, vegetation checks completed by an Ecological Clerk of Works (ECoW) immediately prior to clearance activities should be sufficient to safeguard common bird species, their nests, eggs and young.

We are confused and slightly taken aback by the wording 'it is likely' and 'in the event this is not feasible' Presumably the planning consent would be conditional on works being undertaken outside nesting season. If not this inevitably would carry a high risk of disturbing both tree and ground nesting birds. In any event, the ECoW must be a suitably qualified and experienced ecologist (not a Graduate) who is able to confidently locate ground nesting Chiff Chaff, Song Thrush, and Dunnock nests through behavioural observation as well as physical searches. Tree felling should only be undertaken outside the nesting season.

7.71 A badger licence from Natural England will likely be required to lawfully proceed with the works and avoid any unintended, negative impacts to badgers and their setts. It is likely that some of the setts will require 'closing' under a said licence, whilst others deemed a sufficient distance from the Proposed Development footprint can remain open.

With the addition of 120 households and associated gardens, roads and other infrastructure, plus the proposed blocking of a key corridor, and given the loyalty badgers show to traditional paths and routes, the potential for household / badger conflict is high, with likely significant effects on both. In a location where persecution of neighbouring clans has recently taken place, the impact on this community of further constraints and disturbance is heightened further. We question the viability of blocking sett entrances on such a constrained site, particularly with added pressure of changes to neighbouring Longford Park, and we suggest options to be considered and evaluated through the EIA include: consideration of how to avoid blocking of routes and access to established foraging areas; designing in features that would protect the existing clan from disturbance by humans and domestic pets; designing in protection for gardens; how the clan relates to and uses neighbouring areas.

The 2023 Badger Trust Guidance for Planning and Development and future update incorporating guidance for Urban Badgers, if completed in time, should be referred to in considering the possibilities for mitigating measures. The local Badger Trust group should be consulted for advice as they are familiar with the territory and social behaviour of Urban Badgers who do not always follow typical expected behaviours.

Chapter 8 Socioeconomic and Health Factors - In Scope

This section of the scoping report is heavily weighted towards impacts on the economically active population, but some of the key beneficiaries of the Fields currently are the young and elderly, women who feel safe to access nature here in this 'contained' setting, and people with long term mental and physical health challenges.

This is particularly pertinent as the proposed demographic mix is somewhat unbalanced (a mix of mostly low income older people and high income families) and the location on the boundary of this number of new homes to be provided is also likely to impact on health (more older people's apartments) and education infrastructure in the Trafford Local Authority area – it is widely known that Chorlton's popularity owes much to Trafford's Grammar school system - and consideration should be given to this in the assessment of socioeconomic factors.

Ryebank Fields has historic intergenerational community significance for almost 100 years, it acts as an outdoor community '3rd Space' and its loss as a community space would significantly affect the social, physical and mental well-being of people living in the surrounding area.

Para 8.3 Key Plans and Strategies

As part of the core Strategy mentioned here, a key document to consider is the Open Spaces Study, in particular chapter 16 which outlines the nature deficit already present in this part of the City and a **shortfall of almost 60Ha** of this kind of space in South Manchester at the time of the report (written a decade ago). Also for consideration, The Our Manchester Strategy first phase consultation highlighted what people wanted to see in a liveable thriving Manchester of the future.

Paras 8.8 and 8.9 on Potential Effects do not acknowledge the need to examine the impact of the loss of a semi-natural / natural open space within the neighbourhood, and the value of nature connection and a shared community and cultural space.

The Environmental Statement should evaluate **Operation phase effects on neighbourhood amenity space** for the 25,000 residents who live within 15 minute walk, particularly in an urban area where green and especially nature spaces are already limited. Current access to nature, even before new housing developments for 100s more residents within 1km walk, falling well below MCC's quantity standard of 1.9Ha / 1000 people.

This community value has been acknowledged by MCC Planners in their acceptance of our submission of the Local Green Space proposal that the Fields meet the criteria of being "demonstrably special to a local community and holding a particular local significance, because of its beauty, historic significance, recreational value, tranquility and richness of its wildlife"

Chapter 9 Climate Change

Overall, the methodology appears sound, but incomplete as it only proposes to assess the following:

• Construction stage GHG emissions, including emissions on site and associated with transport of waste, materials to and from the site.

• Embodied GHG emissions associated with the materials used for construction of the Proposed Development, including extraction and production of the materials, maintenance and replacement.

• Operational GHG emissions, including both energy related GHG emissions associated with the buildings within the Proposed Development and transport related GHG emissions associated with the movement of people to and from site.

It does *not* consider emissions associated from land use change. Those would be:

a) changes in the flow of carbon to and from the atmosphere and the site biomass/soil;
b) changes in the stock of carbon presently stored onsite, in the biomass and the soil.
c) the opportunity cost for increased carbon sequestration from increased tree growth or other land management practices

These would have to take into account restoration of planting and soils (which would have to happen anyway given the intention of mitigating the toxic waste in the subsoil). Given the landscape, there would likely be a net positive emission of carbon.

For both the flow and the lost opportunity questions, the cited site lifespan of 60 years would be a reasonable time-frame to use.

In terms of climate change mitigation, the Fields are noticeably cooler on hot summer days and nights and provide a valuable escape from the fierce heat - as well as their sponging up the rainfall from our increasingly wet seasons. An understanding is needed of the opportunity cost of replacing heat and flooding mitigating green infrastructure with tarmac and concrete/brick.

We would also suggest an assessment of embodied carbon emissions within material selection at the design stage.

The options for alternatives referred to in section 5.6 could also include calculations of these impacts

9.23 It is proposed to 'scope out' assessment of climate resilience for the construction stage, as due to the short-term nature of the construction period (<10 years) of the Proposed Development, it is not considered to be vulnerable to climate change.

The relatively long construction period brings likelihood of extremes of weather during that time, including surface flooding, so we would suggest climate resilience should be considered for the construction phase.

9.39 A workshop will be held with the design team to run through the climate resilience assessment and to identify inherent and additional mitigation measures.

This should include representatives of the ecology team to consider both impact of suggested mitigation measures on ecology, and also consideration of building climate resilience for nature resilience (eg wildlife corridors) into these designs.

One final observation is that while the report cites various relevant policy documents, it is not stated which takes precedence. The Greater Manchester carbon budget and net zero date are more ambitious than the legislated national ones (2038 and 67 Mtonnes). The carbon policy in Places for Everyone (Policy JP-S2, pages 89-91) does mandate net zero operational and embodied emissions, as follows:

An expectation that new development will, unless it can be demonstrated that it is not practicable or financially viable; a. Be net zero carbon (which applies: from adoption– to regulated operational carbon emissions; from 2028 - to all emissions 'in construction'. From 2025 development should also calculate and minimise carbon emissions from unregulated emissions alongside regulated emissions. Development proposals should set out how this has been achieved in an energy statement in accordance with the energy hierarchy, which in order of importance seeks to:

i. Minimise energy demand;

ii. *Maximise energy efficiency;*
iii. *Use renewable energy;*
iv. *Use low carbon energy; and*
v. *Utilise other energy sources.*

Chapter 10 - Topics currently Scoped Out

Landscape and Visual

10.4 The proposal is situated within an existing urban setting in Chorlton. The site is bound by residential development to the north, south and east. To the west lies Longford Park, within which lies the Trafford Athletic Club. To the southeast of the site lies the St Johns RC Primary School.

The document fails to mention that Ryebank Fields shares a border with Longford Conservation Area. Section 3.3.2 on page 10 of that document describes *"wide open vistas, particularly in the northern part of the park, which give a sense of space within a built up urban area"*

In 10.6 the applicant refers to the *increased permeability within nearby green space.* The Official Pre-Planning Application identifies pathways through the western boundary of Ryebank Fields connecting to Longford Park, through the belt of mature trees which have a striking visual impact as well as their notable Heritage. The proposed plans would impact on this mature boundary. The sense of open space beyond the Conservation Area boundary enhances its setting & this would be significantly impacted by construction and housing beyond.

The Development Framework which they say is *"an important material consideration in the determination of the planning application"* says: *"There is an historic Nico ditch that runs East to West across the site which .. is an important landscape character of the site."*

There is no reference to a clear strategy for the management & maintenance of the woodland boundary with Longford Park, nor to the proposed de-culverting of Longford Brook. The proposals appear to include building a road and a water retention basin over the Nico Ditch, an important landscape feature and wildlife corridor even aside from its heritage value. All of these will have a variety of impacts across ecology, hydrology, vistas and heritage.

At night the combined areas of Longford park, St John's School grounds and Ryebank Fields currently offer a palpable 'dark sky' amenity value at night. The moon and stars, and on occasion Northern lights can be clearly visible and enjoyed on a clear night, above a natural landscape of grassland and hedgerow.

The **Longford Conservation Area Supplementary Planning Document SPD 5.19A section 2.67** notes that mature trees are very important characteristics of the Conservation Area, and in particular that the carefully planted 'landmark' trees are significant.

Trafford Council response to Consultation this autumn expressed: "…concerns over potential for significant impact of the building and associated car park in the southwestern corner of the site on the setting of the Longford Park Conservation Area... At present the sense of open space beyond the Conservation Area boundary enhances its setting and this could be impacted in this corner of the site. In addition, the access to the park at this point is proposed to be upgraded to create a 'gateway' to the park, so cumulative and conflicting impacts need to be considered."

The loss of these vistas and landscapes would have effects on heritage and amenity and knockon socioeconomic impacts. For these reasons we believe Landscape and Visual aspects should be in scope.

Heritage and Archaeology

10.8 "*The site does not contain any Heritage Assets."*

- The applicant fails to refer here to the Nico Ditch earthwork which crosses Ryebank Fields.
- The applicant also fails to mention that Ryebank Fields shares a boundary with **Longford Conservation Area**, a key GM heritage asset steeped in history of Manchester's Industrial past.

10.11 The ditch cut crossing the Site on an east-west alignment and which appears to have been relatively unaffected by the known clay extraction, is reputed locally to be part of the Nico Ditch.

The EIA scoping report refers to Historic England's rejection of an application to list this feature, and goes on to conclude *(10.12) that 'there is no evidence to reasonably indicate the potential for the presence of archaeological remains which would preclude development and result in significant effects for the purposes of the EIA.'*

This is **inconsistent** with the Developer's proposals. The Development Framework which they say is *"an important material consideration in the determination of the planning application"* says: *"There is an historic Nico ditch that runs East to West across the site which .. is an important landscape character of the site."*

They also say: *Whilst the Nico Ditch is not a listed heritage asset, we want to recognise its pathway through the site. The details of how the feature will be created and will allow people to learn more about its history will be included as part of the planning application submission.*

One of the two grounds Heritage England (HE) gave for refusal is that there was at the time insufficient evidence of the archaeological potential of this section. HE went on to say that if 'future investigations provide evidence of the site's national importance then it could be reassessed for scheduling at that time'. FORF subsequently contacted Heritage England in November 2024 to alert them to new evidence, and we have been advised that we can make a new application on those grounds. Appropriate archaeological works would need to be undertaken to rule this out as a feature of importance, and these findings may have knock on impacts on design and would need to factor in ecological, hydrological and other concerns.

The integrity of the eastern boundary of Longford Park, marked by a line of long established trees including what are locally known as 'Enrequita's Trees' – 10 Hybrid Black Poplars around 130 years old, reputedly planted at the behest of Enrequita Rylands. One of the trees has subsequently been identified as a rare Black Poplar aka Manchester Poplar – again with significant heritage value, and recorded as a Notable Tree on the Woodland Trust's Ancient Tree inventory.

The **Longford Conservation Area Supplementary Planning Document SPD 5.19A section 2.67** notes that mature trees are very important characteristics of the Conservation Area, and in particular that the carefully planted 'landmark' trees are significant. The tree line also incorporates an Important Hedgerow (classified as such by GMEU in 2021), and is a key historical feature which requires special consideration. It is significant not just for its visual amenity, but because it is the only surviving boundary marker of the Longford estate, which reached its fullest extent under John Rylands.

Trafford Council response to Consultation this autumn expressed: "…concerns over potential for significant impact of the building and associated car park in the southwestern corner of the site on the setting of the Longford Park Conservation Area. At present the sense of open space beyond the Conservation Area boundary enhances its setting and this could be impacted in this corner of the site. In addition, the access to the park at this point is proposed to be upgraded to create a 'gateway' to the park, so cumulative and conflicting impacts need to be considered."

In addition to its landscape, history, tranquillity and ecological value, the Fields hold deep cultural significance for the local community. For generations, this land has been a space where people have

connected with nature, fostering a sense of community and continuity and a sense of community and place. The Song of Ryebank Fields, a poem celebrating this connection to land and to each other was a finalist at this year's Manchester Culture Awards. **For these reasons we believe Heritage and Archaeology should be in scope**

Transport and Access

10.18 Overall, the site is sustainably located in an urban area with good proximity to transport links and key services and facilities. Given the scale of the development, it is anticipated there will be no significant effects on the highways network through traffic trip generation and distribution and therefore transport and access can be scoped out of the EIA.

Trafford Council response to consultation in Feb 2023 said "The scale of the development would have an adverse impact on the residents of Rye Bank Rd in terms of traffic & noise generated from the construction phase, and the overall increase in traffic to the site. The impacts of increased traffic on the junction with Great Stone Rd as a whole are not addressed." It is reasonable to assume a risk of similar significant impacts on Ryebank and Longford Roads to the south, compounded by the proximity to primary schools and an athletics club, all of which contribute to severe congestion and conflict at school drop off / pick up and trial meet times.

Trafford roads already deal with regular episodic congestion and parking issues due to events, and all the neighbourhoods between Ryebank Fields and the Old Trafford Stadium and as far eastwards as Seymour Grove are subject to resident parking permits on event days because of the pressure for parking. The planned expansion of capacity at Manchester United football ground and other developments in the surrounding Civic Quarter and Longford Park will only increase the cumulative effects. Peak congestion and out of town traffic during events (football, cricket, gigs etc) are not typical of most suburbs, we wonder whether standard highway modelling will capture this and particularly the potential for conflict in areas with high numbers of pedestrians, school aged children and cyclists at both North and South of the proposed development?

Residents on both sides have repeatedly raised concerns with both Longford and Chorlton councillors around road safety, congestion, and parking issues over a number of years and have recorded numerous accidents. The highways agency have been engaged with both sets of discussions, and recently released a report regarding the Kensington Rd / Oswald Road junctions that supports the use of traffic calming measures. Play streets / School Streets have historically been explored (2022) but not recommended near St John's or on Oswald Road Schools, as not feasible due to carriageway constraints (length and narrowness, as there is insufficient room for cars to pass). In a (2019) leaflet, Cllrs John Hacking, Eve Holt and Matt Strong acknowledged the "already terrible traffic issues around the Longford and Ryebank Road areas"

There is also a wealth of photographic evidence of blockages (eg an ambulance not being able to pass on Longford Road), and accidents at junctions. Residents have provided examples of how they arrange their lives around avoiding school run and rush hour, and St John's School asks parents to participate in an informal 'one way system' at school run times.

The authors of this report propose to deal with any additional Transport and Access issues arising from 120 additional homes via a 'travel plan' - this in itself suggests inadequate understanding of existing local issues. It is overoptimistic to expect the majority of older adults living at least a 15 minute walk from local shops, high income families with young children, in an area with known road safety issues, will choose walking or cycling at peak times.

In addition to the daily inconvenience, stress, and road safety issues are the air quality concerns described in section 10 and again heightened by the areas' proximity to athletics grounds and a primary school with playing fields, and with additional pressure from the cumulative effects of

developments itemised in section 3.12/3.13, including visitor traffic alongside significant additional residential developments.

All of these factors create a hostile environment for walking and cycling, further reducing the appeal of the active travel option. By contrast, currently the opportunity to walk through a nature rich space with a sense of community and the added possibility of social interaction is a positive incentive to travel on foot or by bicycle rather than by car. For all these reasons we believe Transport and Access should be in scope

Noise

10.20 The construction phase will involve a number of activities which have the potential to generate short term, temporary increases in noise levels at nearby sensitive receptors if unmitigated. However, these activities will be managed by a CEMP and secured by planning condition, and it is not anticipated there would be significant construction phase effects.

The word 'temporary' is doing some heavy lifting here. The construction phase, including remediation, would likely be over a significant period of time – possibly 2-3 years or more.

Given that the school grounds are bounded to the East and North by the proposed construction site, and to the South by a key access road, this is a potentially significant impact on children who could spend half of their school career surrounded by a construction site, operating mostly through school hours.

Similarly for wildlife, many birds and mammals have a lifespan of less 3 years, so this is a significant impact – also on their breeding patterns and the overall populations.

10.21 At the competed development phase internal noise levels will be achieved through the use of appropriate design measures such as glazing and ventilation strategies, where this is deemed to be required. As the proposals are for residential development, and therefore not a noise generating use, no significant noise impacts are expected on existing receptors. As such, it is not considered that significant noise effects are likely and this topic can be scoped out of the ES.

Vegetation and wildlife are evidenced to 'deaden' city noise, both objectively and subjectively. The 'tranquility' on the Fields is one of the arguments made for them being designated as Local Green Space. The removal of a significant area of open space surrounded by trees, and its replacement with hard services will significantly impact on the tranquillity experienced by residents and schoolchildren in proximity to the fields. For all these reasons we believe Noise should be in scope,

Air Quality

10.22 The site is not located within an Air Quality Management Area (AQMA). The closest AQMA is the Greater Manchester AQMA which, at the closest point, is located approximately 200m east of the Proposed Development

This statement is both **inconsistent** with Para 4.6, and **incorrect**. The closest Manchester AQMA is approx. 200m to the South on Edge Lane, not the North as stated. Closest to the North is the Trafford AQMA, approx. 100m from the edge of the Fields.

10.22 (contd) During construction of the Proposed Development, dust may be generated through enabling works and construction activities. Dust generation would be managed in accordance with standard best practice measures…With appropriate mitigation in place..significant effects are not considered likely….there would be increased emissions from construction vehicles including HGV vehicles. ..the construction phase will be temporary.

The word 'temporary' is again doing some heavy lifting here. If the construction phase, including remediation, may last 2-3 years or more. Given that the school outdoor play areas are bounded to the

East and North by the proposed construction site, and to the South by a key access road, this is a potentially significant impact on children who could spend half of their school career surrounded by construction traffic and the related air quality impacts.

10.23 Once operational the development is not expected to generate significant numbers of vehicle movements. Considering this, no significant adverse effects are expected in relation to air quality and therefore it has been scoped out of the EIA

Despite the site itself not being within an Air Quality Management Area (AQMA), it is surrounded by them, the nearest being 100m to the North in Trafford. Construction dust, emissions from additional traffic, and operational phase impacts could be significant given the proximity to residential areas, school playgrounds, and Opportunity Area of the LNRN in Longford Park.

Air pollution outside St Johns school is in the 85th percentile and described as "very high", The readings recorded at Oswald Road school are higher placing this address in the 87th percentile. See addresspollution.org. Localised congestion on Longford Road and at times Great Stone Road (eg on event days which can be 3 or 4 times a week during the summer) increases these values.

Measures on site and at the school showed huge disparities – from AQI of 145 to 13 at school drop off Grasses, mosses, ivy and trees are known to clean the air and go some way to mitigating the effects of air pollution. A significant cumulative impact on air quality from increased traffic from this and other developments plus loss of mitigating green infrastructure can't be ruled out at this stage.

A City Centre based community group 'Trees not Cars' successfully challenged MCC's planning approval of a temporary car park over a lack of attention to air quality issues particularly given the proximity to a school. The new design incorporates a park which 'buffers' the effects of the main road from the surrounding areas, in recognition of the protective effects of vegetation.

Air pollution is also a key socioeconomic factor, as it can impact cardiovascular health, breathing, brain development and educational attainment and affect children's life chances. For these reasons we recommend air quality be deemed in scope.

Flood Risk and Drainage

10.24 *The site is located entirely within Flood Zone 1 and is therefore at a low risk of flooding. A small section within the centre of the site is at high risk from surface water flooding however the majority of the site is classified as low risk. The site is located in an existing urban area and the Proposed Development would not significantly increase the amount of impermeable area and therefore would not increase flood risk at the site or for the surrounding area.*

The 'small section' referred to is most of the Nico Ditch as it runs through the site. A large section of the Southern grassland area continues to exhibit surface water flooding several times a year, and the majority of this area of permeable topsoil and vegetation would be replaced by impermeable surfaces. During the previous site investigations in 2020/21 a large proportion of boreholes flooded before they reached full depth

Surrounding gardens, and the Park experience extensive surface flooding, with over 30cm of water, and are marked as a High surface water flood risk area as per Environment Agency mapping. Residents on Longford Rd, Nicolas Rd have experienced water under the floorboards and in the cellars of their properties and many have had pumps installed by United Utilities.

Ryebank Fields are also in a Critical Drainage Area and an area At Risk of Ground Water Rebound.

The Longford Brook was previously culverted under Ryebank Fields and evidence of what appears to be the Victorian culvert was exposed during MMU 2020 excavations. See pic:

The report suggests "no significant environmental effects" for water-related impacts. However, the presence of Nico Ditch and areas of "low to high" surface water flood risk within the site warrants reconsideration. The potential impact of construction and development on local drainage patterns and flood mitigation needs assessment.

10.24 A Flood Risk Assessment and Drainage Strategy will be prepared and submitted alongside the application

The Flood Risk Statement and Conceptual Drainage Strategy (BWB June 2020) stated that "The proposed development will increase the area of impermeable surfaces on site. This will result in an increase in surface water runoff, which could increase flood risk downstream unless properly mitigated". Page 17.

It will be important to properly understand the status and course of watercourses and drainage within the Fields as well as understanding how they relate to the wider catchment and surrounding areas. In addition to consider the adequacy and impacts of proposed flood risk and surface water management strategies on ecology, on Longford Brook both within the Fields and onwards into Longford Park, on neighbouring gardens and homes, and any effects on ground or surface water contamination levels. There may also be heritage impacts if any diversion / culverting of the Brook interacts with the Nico Ditch. In addition, the socioeconomic impact of alterations to drainage and flood risk should be taken into account. For all of these reasons we believe Flood Risk and Drainage should be in scope

Ground Conditions and Soils

10.26 *On the basis of the data gathered to date, which includes a Phase 1 Desk Study, a Phase 2 Geoenvironmental Site Assessment and preliminary recommendations for remedial works, the topic of 'Ground Conditions' can be scoped-out of the EIA process. The ground conditions do not consist of a baseline which would require complex remediation techniques and which would trigger the need for a detailed assessment through EIA. Indeed, the proposed remediation measures, consist of standard, well-established procedures that can be secured by suitably worded planning conditions. Further details are included in the Ground Conditions Technical Note prepared by E3P at Appendix 3.*

There is a significant number of these processes to be undertaken, and these include some substantial and invasive works. The likely combined and cumulative impacts of these works on ecology, trees, flood risk patterns, contamination, socio economic effects should all be considered in the round.

At Page 4 of Appendix 3 – Ground Conditions Technical Note of the scoping report e3P now write that the north of the site was classified as CS1, however monitoring wells in the south of the site have been identified as CS2 and CS3. Within WS102, WS103 and WS104 monitoring has suggested the locations to be classified as CS4; however when reviewing the calculated GSVs, the classification has been noted as CS2 and CS3 within these locations."

The above statement in Appendix 3 is **inconsistent** with the original reports….

“Ground Gas - the south of the site has been assessed as being Amber 2 / CS3 and Red/CS4. The gas source is deemed to be associated with the underlying Made Ground deposits. As WS102 and WS103 have been assessed as being Red/ CS4 this would suggest this area is not suitable for residential development”. Page 6 PHASE II GEOENVIRONMENTAL SITE ASSESSMENT E3P March 2020.

Page 33 of the phase II reports tabulates CH4 methane at WS102 at 26 % V/V with a flow rate of 0.26 l/hour and at WS103 at 64-74 % V/V with flow rates of 1.6-4.3 l/hour.

Page 50 4.3 explains how the risks and Gas screening values (GSVs) were derived.

- GSV = concentration (by vol) 100 × flowrate (1 / hr)
- So, at WS102 GSV = 6.76
- And at WS103 GSV = 64 & 318

The threshold for High Risk / Red is and land not suitable for residential development is 3.5. The GSVs in the South Field are well above 3.5.

The air quality section 10.22 discusses dust arising from construction, but says nothing about the risks from the hazardous ground gas (carbon dioxide and methane). These were identified by e3P as posing ‘a low-level risk to construction workers and residential end users’. Phase I Geoenvironmental Site Assessment March 2020.

In addition, there could be significant impacts on Longford Brook of these proposed remediation methods within Ryebank Fields, and these in combination factors should be considered.

The landowner’s main justification for developing the site is a need for remediation, therefore presumably they intend impact to be significant. Given the complexity of the interrelated factors particularly impacts on ecology, potential contamination of a river, socioeconomic factors relating to concerns about the risk of contamination and air quality and accidents from UXOs caused by remediation works, we believe ground condition and soils should be within scope.

Material Assets

Trafford Council’s response to the 2023 draft included the statement that the Fields are “a key recreational, community & historical assets of the area…..development will impact on Trafford residents & our management of the park & its environs”

The plans propose highway access over privately owned Trafford land, currently the site of a Community Garden, between the end of the carriageway along Rye Bank Rd and the border with Manchester. This **Community Garden**, created, cared for, celebrated and enjoyed by residents, visitors and passers-by, is listed as an **Asset of Community Value**.

The proposals to re-locate this within the Ryebank Fields development do not appear to have given consideration as to whether that would be acceptable to the residents who created, how it would be managed, and what safeguards would be in place to ensure the garden was usable by the community within the Trafford Local Authority Area who originally created it.

Ryebank Fields themselves have even greater assets of both human and natural origin that are hugely important to the local community. They are an open air ‘third space’ where connection with nature and other people happens in all sorts of structured and unstructured ways – from dawn chorus walks, to festivals, to moon gazing, to picnics, open air meetings, plays, poetry reading and crafting, wassails and carol singing – the list is long.

As identified in 7.67, The authors acknowledge that the development would lead to a **loss of biodiversity on the site**. This net loss would have a significant impact not just on the local and

neighbouring ecology, including that of Longford Park (identified as an Opportunity Area in the draft Local Nature Recovery Network) but also on socioeconomic and health factors, and their status as material assets - given the social, cultural and health value of Ryebank Fields to thousands of local people (detailed in the Local Green Space application, first submitted in 2020 and 'validated' by Manchester City Council planners in summer 2024).

The Fields have also been a subject of academic interest for many from undergrad to Professor, particularly for research related to local ecosystems, biodiversity, anthropology, arts, architecture and music. Their loss could impact future research opportunities and educational engagement with the community.

Overall, the development would result in a significant loss of green infrastructure benefitting residents of both Trafford and Manchester. Up to 25,000 residents live within 15 minutes' walk of Ryebank Fields. This loss of the Fields would also significantly increase demand on the open space at Longford Park and its facilities, already set to significantly increase visitor numbers from further afield, and increase pressure and encroachment on the woodland with sensitive wildlife areas.

For these reasons we argue that Material Assets should be in scope

Lighting

10.30 The scoping report proposes the use of standard guidance and that: *..Lighting will be designed in conjunction with the design team and landscape consultant to ensure that lighting is appropriate in terms of the potential effects on public realm and surroundings of the site..*

No reference is made to the immediate proximity of houses and highways to wildlife habitats including homes of protected and endangered species. The proposed retained woodland areas include potential roosts, nests and foraging habitats of bats, owls, and nocturnal mammals including voles, hedgehogs and badgers all of whom are sensitive to light, as are invertebrates many of them feed on.

Sensitively balancing the demands of public safety, and protection of wildlife areas from anti-social behaviour at night against the need to minimise the ecological impacts of artificial lighting, would be a challenge in design terms that needs to factor in the interplay of socio economic and ecological impacts of the options considered, and the links to wider developments, in particular the proposals for Longford Park.

In addition, the combined areas of Longford park, St John's School grounds and Ryebank Fields currently provide a significant 'dark sky' amenity value at night. In addition to the value to humans of an area of sky where the moon and stars can be clearly visible on a clear night, dark patches of land are important to navigating birds flooding that area with domestic and street lighting will have a significant impact which needs consideration.

Finally, all of these factors are likely to have a cumulative impact when considered alongside significant other foraging and nesting habitat loss, encroachment of human activity, and physical and noise disturbance, with increased footfall, littering, dog and cat littering and removal of ground cover.

Because of the significant interplay of socioeconomic, amenity, visual, ecological effects of lighting strategies described, their wider impacts beyond the site, and cumulative interplay with other factors causing disturbance to wildlife, we consider it very important that lighting is in scope.

Accidents and Disasters

The reports by E3P refer to a risk of UXOs – this would of course presumably be subject to conditioned site management practices, however we are slightly concerned that they have not been referred to, so we would seek reassurance that this has been part of the consideration of the EIA scoping process. It is certainly a very live concern for people who are local to the Fields and parents of schoolchildren.

Daylight and Sunlight

10.34 *There would be no potential for issues of overshadowing or light obstruction to adjacent properties such that an assessment would need to be undertaken to quantify the impact and propose mitigation. It is therefore proposed that an assessment of daylight, sunlight and overshadowing effects can be scoped out*

The applicant fails to acknowledge that the land at Ryebank Fields, under Operation Eyesore, was 'made up'. The levels of the made land on Ryebank are significantly higher than the neighbouring residential properties on Park Sq, Copely Rd, Peveril Cres. The Official Pre-Planning application proposes densely formed 3 storey structures adjacent to current 2 story residential properties that are sited on lower land. As a consequence, there is a risk of significant overshadowing & light obstruction to these properties.

Additionally, the Aspen Grove as a natural feature will also suffer impacts from overshadowing, light obstruction and densely formed structures.

For these reasons we believe Daylight and Sunlight should be in scope

Water

Regarding the (culverted) Longford Brook and water being scoped out the authors seem to be relying on the 'diversion of Longford Brook' to rule it out of scope. At page 2 of Appendix 3 – Ground Conditions Technical Note of the scoping report e3P write *"Longford Brook (culverted) is located circa 210 m west of the site. Longford Brook historically flowed through the site, however has since been diverted."*

This statement we believe is incorrect, and it is unclear what diversion they are referring to, where it has been diverted to, or why this would rule out the assessments on water being required. Whilst the course of the Brook in the past was diverted it is believed that it has reverted, at least partly, to its original course - and nevertheless it has always run through some part of the site, either through the north field or along the course of the Nico Ditch.

Longford Brook is designated as a 'main river' by the Environment Agency 200m to the west in Longford Park and beyond. As previously highlighted, Trafford Council's plans for Longford Park include the 'daylighting' of Longford Brook through the Park. The combined implications of these proposals for with plans for Ryebank Fields could be significant, given the number of people impacted (according to the HLF bid documents, currently 365,000 park visits annually, with expectation to increase this substantially following the improvements) and also given the heritage nature of the proposals.

The risk to the Brook has been recognised previously many times in the previous reports, e,g,

- 'Risk from Mobile contaminants such as metals, PAHs, hydrocarbons, volatile compounds (Made Ground) via surface run off and/or Migration through permeable strata and preferential pathways.to Groundwater and Longford Brook. Recommendation: Sampling of groundwater and surface water required'. Page 32, Phase I Geoenvironmental Site Assessment March 2020
- 'Further controlled waters risk assessment using the mBAT tool for heavy metals following the completion of supplementary groundwater sampling'; Page 9, PHASE II GEOENVIRONMENTAL SITE ASSESSMENT March 2020.
- 'A detailed controlled water risk assessment will be required in order to confirm the absence of risk to controlled waters'. Page 15, PHASE II GEOENVIRONMENTAL SITE ASSESSMENT March 2020.

The Flood Risk Statement and Conceptual Drainage Strategy (BWB June 2020) stated that "Further investigation of the culvert is required in order to understand the connectivity of the ditch to the west of the site and confirm any connectivity to the Longford Brook". (see Page 11). We are not aware that

any of these recommendations have been acted on, or of any other new evidence to support scoping out the risk to water.

There is overall a lack of clarity and many assumptions being made which do not seem to be founded in material evidence. The impact of survey findings and suggested further works required may have knock on effects on other aspects currently both in and out of scope including contamination, flood risk, ecology, proposals for Longford park, etc. For these reasons we believe Water should be in scope.

CONCLUSION

Thank you for the opportunity to comment on the EIA Scoping Opinion submitted by Asteer on behalf of Step Places, Southway Housing Trust Limited and Manchester Metropolitan University (dated November 2024)

In addition to Ecology and Arboriculture, Socioeconomic and health, and Climate Change, we believe the following should be in scope, for the reasons given throughout the report above, summarised in bold at each section:

Landscape and Visual; Heritage and Archaeology; Transport and Access; Noise; Air Quality; Flood Risk and Drainage; Ground Conditions and contamination; Material Assets; Lighting; Daylight and Sunlight; and Water.

We also hope you will also consider our comments and contributions to those matters that are already deemed ‘in scope’ in order to provide an appropriately thorough and accurate analysis of some complex and sensitive issues.

Kind regards,

Friends of Ryebank Fields 17th December 2024

Response to: Manchester City Council Draft Local Plan
From Friends of Ryebank Fields – 2024 refreshed edition

In April 2020, the Friends of Ryebank Fields (FORF) submitted a formal proposal that Ryebank Fields be classified as a **Local Green Space** in the Local Plan. As the Local Plan process has been delayed for the last 4 years, FORF have reiterated this wish at every opportunity. Preserving this rewilding urban greenspace would safeguard it for present and future generations of people and wildlife, and serve as a signal of intent and model of excellence in fostering connection between urban dwellers and nature, to mutual benefit.

As declared by Manchester City Council in July 2019, we are facing a Climate Emergency. In March 2022, the Greater Manchester Combined Authority declared a Biodiversity emergency, and signed the **Edinburgh Declaration**, a statement of intent calling for action to reverse biodiversity loss, and making a case for the role of cities and local authorities in delivering that change. Protecting existing wild spaces will play a significant part in the response to these intertwined and urgent crises. In March 2024 **The GM State of Nature Report** included a commitment to Nature Recovery and to increasing the accessibility of nature connection within walking distance for Greater Manchester residents.

Ryebank Fields, pictured above, is 12 acres of Greenfield land which was purchased by the Council in the 1960s, to preserve it as open green space for recreation and education. In the early 1970's it was remediated with Government funding and then allocated to Manchester Polytechnic - at that time part of Manchester City Council and now Manchester Metropolitan University (MMU) - for use as playing fields. MMU moved its sports facilities elsewhere in the 1990's and the fields, no longer mown, have rewilded into meadow and boundary hedges into woodland. Ryebank Fields is special to the local community, and exemplifies all the criteria for 'Local Green Space' designation, as confirmed by the Council's Planning Strategy Lead in an email in June 2024.

Legal Framework

The National Planning Framework (NPPF), published by the Department for Levelling Up, Housing & Communities in December 2023, sets out the government's planning policies for England.

Paragraphs 105 to 107 of the NPPF[1] provide for a Local Green Space designation (LGS) to **protect local green areas of particular importance to local communities.** These paragraphs set out the use of the designation and the criteria to be satisfied, which are as follows:

Local Green Space Criteria:

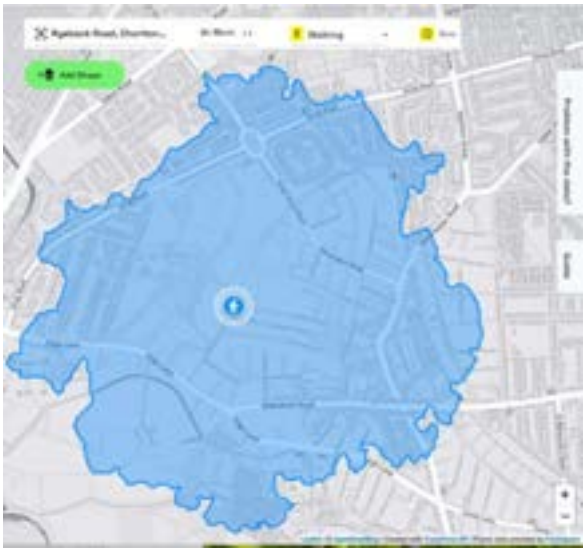
(1) The Green Space is in reasonably close proximity to the community it serves;
(2) The Green Space is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife;
(3) The Green Space is local in character and is not an extensive tract of land

Annexed to this proposal is also a 2020 Research Report on the uses and impacts of Ryebank Fields by Dr Jenna C. Ashton, University of Manchester. It provides detailed evidence and analysis of the eligibility of Ryebank Fields as a Local Green Space and has informed both our original response in 2020 and this refreshed version which includes some updates and other relevant evidence.

Evidencing the Local Green Space Criteria:

(1) The Green Space is in reasonably close proximity to the community it serves;

Ryebank Fields is within the community it serves. Located within the North West of Chorlton ward, Manchester, to the north and west it is bordered by Stretford, in Trafford.



The Fields are extensively visited by the local community. At least 12,000 people[2] from broad socio demographic and housing mix live within a 15 minute walk of the centre of the Fields.

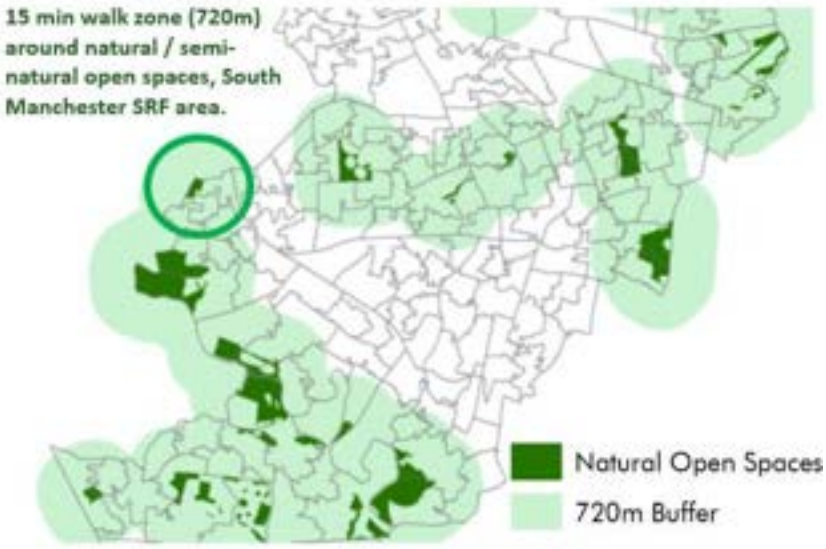
Map – from Travel Time map demo[3]

(2) The green space is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife;

General evidence that Ryebank Fields is demonstrably special to the local community
The Fields and their trees, woodlands, meadows, hedgerows and scrublands are an integral part of the history and culture of the communities that surround them. This is demonstrably reflected in

[1] https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-and-safe-communities#para100
[2] Source: https://www.freemaptools.com/find-population.htm
[3] https://app.traveltime.com/

the passions driving the decades long, multigenerational campaign to save the Fields from being developed, and also in the arts and cultural activities that have sprung up here over the decades.



This map from Manchester City Council's Green Infrastructure report 2015 (p52), shows areas within a 15 minute walk of Natural Open Spaces (Ryebank Fields is circled green). It's clear from this map how much of the South Manchester Regeneration area has no walkable access to nature. This lack of natural green spaces also means that current access, even before new housing developments for 100s more residents, falls well below MCC's **quantity standard** of 1.9Ha / 1000 people. Only Central SRF has a lesser amount per person.

Campaign

Save Ryebank Fields is an umbrella campaign, involving a diverse range of individuals and community groups who work together to protect the Fields. The overriding objective is to protect the Fields from development, as reflected in the campaign motto 'Not One Blade of Grass'.

Photos by Jay Clarke

As at July 2024, the Friends of Ryebank Fields Facebook Group has over 2.5k members, the Instagram channel had 860 followers, and on Twitter/X 1,360 followers, both local and from further afield, reflecting alliances with related campaigns elsewhere.

The overriding message of the Local Plan consultations, as highlighted in MCC's own report on the consultation findings, was that 44% of respondents received across the whole city wanted Ryebank Fields to be protected and given Local Green Space status.

a) Beauty

"I prefer Ryebank Fields to the park nearby because there is a plethora of wildlife and vegetation that is limited in the park. The bird song is immense […] it is such a beautiful way to start the day surrounded by wild grasses full of glistening spider webs and a beautiful sunrise." (57, m)

Through the seasons - Pictures by Jay Clarke

The land has rewilded over the last 25-30 years. This gives it a unique untamed beauty, rare in urban spaces, and provides a different character and ecology to the neighbouring mown and managed parkland. It offers an invitation to rediscover our own wild selves. Emerging research[4] suggests the physical and mental health benefits of wild spaces have significant effects not experienced in more managed parks and gardens.

"Walking in Ryebank Fields is very different to visiting parkland which has been managed and controlled. There is a wonderful sense of serendipity to each visit; a rural rather than urban environment." (52, f)

[4] https://www.outsideonline.com/health/wellness/wilderness-nature-outdoors-good-your-health/

"This unique green space has an aura of its own, different to other local green spaces." (64, f)

'Longford park...is ..well looked after. However, Ryebank Fields has a roughness of nature diversity of wildlife plants and a sense of history" (75, m)

(b) Historical Significance

The Nico Ditch crossing Ryebank Fields from East to West dates back to Anglo-Saxon times and is of significant historical importance, recognised by Historic England and written about by scholars.

Within modern history, many of the local houses are believed to have been built from the clay extracted here, so people's homes are intimately connected with the land. Generations of local families have played, loved, laughed and grieved on Ryebank Fields. The local community has long loved, fought for, and cared for the land, and the Fields in turn bring us both solace and joy.

Robert, Jackson, Steven, Martin 1992

"I used to play there in the 1950s and 60s […] I can remember on really hot days how the willow herb flowers and stems used to be covered in hawk moth caterpillars. At school we read a poem about a young boy spending the long summer days out in the fields. That poem revives childhood feelings in a similar way. Occasionally instead of feeling like an elderly sick person I feel like a child." (68, m)

"It is very important to me in that I first went there 30 years ago when my children were small, and so it does have many memories for me." (61, f)

I was born in 1952 and for as long as I remember the fields have been part of my life. I played there as a child and have many happy memories. In adult life it has been just as important for physical and mental health." (67 m)

I have walked this area for over 40 years with many memories." (52, f)

In the 1990's residents ran a successful campaign to save the Fields from being developed.

Community Picnic June 2005

In 2017 the community launched the Save Ryebank Fields campaign. 'Friends of Ryebank Fields' formed in August 2017 and became constituted in October 2019.

(c) Recreational value

"I am a single parent […] full time carer. This was very isolating but using the Fields involves me in the neighbourhoods and community events." (54, f)

"I have walked dogs on the fields for 15 years. Before having dogs we often took our children there to play and make dens. We picked blackberries there and had bonfires picnics and other social events with friends. (61, f)

"There are a lot of elderly people with dogs who use the Fields. Everyone stops for a chat; I think it's important to them." (46, f)

Local people have been using Ryebank Fields for recreational purposes for more than 80 years, fulfilling the covenanted purpose of the City Fathers in purchasing the land, then having it remediated under publicly funded Operation Eyesore, and finally in gifting it to Manchester Metropolitan University for use as Playing Fields with public access.

There is an explosion of research into how spending time in natural environments improves people's health and well-being outcomes[5]

The now naturalised rewilding space is no longer used for Football. Instead they are a place for play, exploration, nature connection, and an almost limitless array of arts, cultural and community pursuits.

A few of these are listed below, and many can be viewed on our YouTube channel

- Everyday outdoor activity, walking to work or school or to visit friends and family, running, dog walking, bike riding;
- Guided community nature walks and citizen science, dawn chorus walks, Birdwatching, Butterfly watching, Bat watching, Wildflower searches, Fungal forays; tree measuring, dowsing, pollinator surveys, bee, bird and butterfly surveys;
- Cultural events like Christmas carol singing, Easter egg hunts, snowflake trail, Valentine hearts trail, wassailing, and other land based and seasonal rituals and celebrations;
- Fruit picking and foraging
- Children playing - climbing trees, daisy chains, playing ball sports, make believe and adventure play, making dens;
- Nature therapy, forest bathing, observing and feeling part of nature in a wild setting;
- As a place to unwind and de-stress informally or through activities such as Yoga, Tai Chi, Sitting circle, silent walks;
- Stargazing and moon watching
- As inspiration and source material for arts, Craftivism, Photography, and music

[5] White, M.P., Alcock, I., Grellier, J. *et al.* Spending at least 120 minutes a week in nature is associated with good health and wellbeing. *Sci Rep* **9,** 7730 (2019). https://doi.org/10.1038/s41598-019-44097-3

- Archery, Kite flying, Flying model aircraft and drones, in the past driving model cars on the undulating terrain;
- Picnics, coffee breaks, walking meetings, organised social gatherings and incidental chats;
- Performances, folk music, dancing, travelling mummers, mini 'festivals'.

In the small community orchard, an annual Wassail ceremony is celebrated. An old English land based tradition to wake up the trees, ward off bad spirits and ensure a good harvest. Through the revival of such old traditions, people are rediscovering a connection to seasons and to the land, inspiring them to want to take care of it, as it does us.

> *'we have lived in Chorlton for 40 years and used the fields constantly – we have walked our dogs, picked blackberries elderberries and met friends on numerous occasions' – (f66)*

(d)Tranquility

The community places great value on the tranquil "countryside" feel of the land, which differentiates it from the adjoining Longford Park. It is also noticeably quieter than Turn Moss and Chorlton Meadows, being much further from the motorway.

> *"with my dog I walk Ryebank Fields on a near daily basis. It is a chance for both of us to escape the deep polluted pavements of Whalley Range and enjoy a unique natural wildlife haven. To see a bird of prey hover and dive or come across an orchid (the Northern marsh orchid grows here) produces sheer elation. I feel I could be in the countryside even if only for a few minutes' (74 m)*

> *'after driving through the urban sprawl of Manchester this is a getaway It is so quiet and tranquil small and unpretentious, a natural haven for birds animals and insects and lest we forget ourselves too' (m, 74)*

There is also a sense of containment and safety, as there are residential roads on three sides. This is something often spoken about between women who walk on the Fields. There's a sense of freedom in being in a wild space that doesn't feel isolated far away from the safety of streetlights and people.

(e) Richness of Wildlife and Nature Recovery Network

> *'being less manicured than the other park area it attracts far more wildlife and sometimes walking through it feels like I am back to the farm where I grew up in the Peak District" female aged 44*

Ryebank Fields is the only significant patch of land outside the Mersey Valley that hasn't been intensively managed and mown for the last few decades. Its resulting rewilding nature and mosaic of habitats from grassland through scrub to woodland, hedgerow, and on different topsoil means the recorded species list is ever evolving. It is fascinating to see the changes[6] over the years and many local and regional and even national ecologists have visited the Fields and found something of interest. Meanwhile ordinary people of all ages are inspired to get to know the natural world, taking part in surveys and recording activities.

> *"The fields themselves have always been so valuable for me not just for exercise but for the joy of being virtually in the countryside when walking through. The grasses flower and trees and the many birds with their birdsongs are a real delight and have helped calm me through some very troubled times." (m, 67)*

Greater Manchester's State of Nature Report[7] published in March 2024 found that Manchester's bird species populations showed declines of up to 40% over the last 40 years and the abundance of once common mammals including foxes and hedgehogs has dropped by between 20-40% since 1995.

Ryebank Fields bucks that trend, with over 82 species of birds recorded on the Fields so far, both passing migrants and nesting species including Blackcaps, Whitethroat, Chiffchaffs, Swifts, and apex predators such as Tawny Owls and Sparrowhawks.
Many different species of insects can be found on the fields including bees, hoverflies, butterflies, damselflies, rare moths, grasshoppers, crickets and beetles. Unmown tussocky grasslands left to grow tall and set seed provide habitat for moths and butterflies who struggle on mown areas of parkland.

Ryebank Fields is also home to, or provides foraging to, a rich variety of mammals including bats, badgers (protected from disturbance by their own 1992 Act), foxes, shrews, voles, mice, and hedgehogs (listed under the International Union for Conservation of Nature (IUSN) 'Red List of Threatened Species'). Older trees within the woodland have hollows and cracks with potential to support roosting, so rate as 'Category 1' value under Bat Conservation Trust Guidelines.

A community led audit counted over 1400 trees in one day in Ryebank Fields. This was corroborated by a preliminary arboricultural report commissioned by FORF in 2021[8]. Most of these trees are within the perimeter woodlands and along the Nico Ditch, all of which act as important wildlife corridors linking wildlife to other parts of the city and beyond. There are a few special Tree features worthy of mention:

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[6] https://youtube.com/playlist?list=PLeA9t7g3AZnulDlM8MRHX_ONGmoe56k3Z&feature=shared
[7] https://www.greatermanchester-ca.gov.uk/media/9526/gm-state-of-nature-report.pdf
[8] https://www.saveryebankfields.co.uk/forf-tree-survey-2021/

The Aspen Grove at the northern perimeter is a unique feature, rare in the UK and the site of many community events and daily walks. It is featured in the forthcoming book “Great British and Irish Trees” by author Paul Wood, who wrote this blog post about it.

Historic Manchester Hybrid Black Poplars aka ‘Enriqueta’s trees’

These trees are believed to have been planted at the behest of well known benefactor Enrequita Rylands, wife of John Rylands in the latter part of the 19th Century. There is also a very rare native Wild Black Poplar located within this group, which is recorded on the Woodland Trust Ancient Tree Register as a notable tree.

Enrequita’s Trees
Photo by Jay Clarke

With similar foresight, over 100 Millenium Oaks are scattered around the perimeters of both meadows, sprung from local acorns planted by a local man. They will celebrate their Quarter Century next year.

Ryebank Fields hosts a biodiverse range of vegetation reflecting the mosaic of different habitats from mixed deciduous woodland, to colonising scrub, to ruderal species that indicate its colourful past such as Bee Orchids, Marsh Orchids, Rosebay Willowherb (a popular bee feeding station), Nettle, and both Creeping and Meadow Buttercup. Pasture and nitrogen fixing plants such as clover and vetches are abundant, as are those loved by pollinators such as Thistles, Lady's Smock and Ragwort. There are a wide range of grasses include crested dogstail, reed canary grass, perennial rye grass, common couch grass, cocksfoot, red fescue, false oat grass, brome and Yorkshire fog and many more.

Important Hedgerow

The largest continuous section of hedgerow[9] is the 270m that forms the edge between Ryebank Fields and the Longford Park conservation area. In 2021 it was surveyed by the Greater Manchester Ecology Unit (GMEU) who confirmed that it fulfils the criteria for a hedgerow of importance, and so is protected by law.

GM Local Nature Recovery Strategy and Manchester Biodiversity Strategy

Ryebank Fields form an important corridor and stepping stone for Nature Recovery within the City. There are apex species breeding here, a sign of a thriving ecosystem, and the land connects the green and nature rich Mersey valley and Meadows areas to the greyer more cultivated and concreted urban neighbourhoods of Old Trafford, Hulme and Whalley Range.

Greater Manchester Local Nature Recovery Strategy (LNRS) Opportunities, 2021

This spatial dataset attempts to plot opportunity parcels for habitat creation, restoration and enhancement a region. It was created as part of the Local Nature Recovery Strategy (LNRS) Pilot 2021. This dataset combines datasets. A full list of contributing datasets is provided below.

Ryebank Fields are identified on the Local Nature Recovery Strategy as having potential for grassland habitat enhancement. This habitat is vanishingly rare – we have lost 95% of our unimproved grassland Nationally since 1970. This loss is linked to insect decline, as many pollinators depend on meadow habitats. The **Manchester Biodiversity strategy**[10] has explicit targets for developing new areas of species rich grassland, and that could happen here with appropriate management.

[9] https://www.saveryebankfields.co.uk/features/important-hedgerow/

[10] https://democracy.manchester.gov.uk/documents/s35928/Appendix%201%20Biodiversity%20Strategy.pdf

(f) Climate resilience and residents' wellbeing

As we experience increasingly warm and wet summers, respite from the heat is particularly important for the elderly and very young. Air temperatures in green spaces are typically 3-5 degrees cooler than surrounding areas especially where vegetation is dense, as both shade and evapotranspiration cool the air around the plants. As well as being a refuge in the heat, the effect also cools the surrounding area for a few 100 metres[11]. This cooling effect can be felt on a hot midsummer day, walking through certain areas where it is damp and shady.

The streets surrounding these Fields are already in or above the 85th percentile[12] for air pollution in the UK and exceed multiple WHO limits. A development on Ryebank Fields would result in more cars and increased congestion on these small roads and reduce tree cover that filters out particulates, and so will worsen this existing health risk. This is particularly concerning for neighbouring residents, children who attend the two adjacent schools, especially those who walk, and could even have an impact on air quality at the neighbouring athletics track.

Houses close by regularly experience pluvial flooding in their cellars and gardens (caused by rainfall overwhelming the drains, rather than river waters rising). Many have had pumps installed by United Utilities. Ryebank Fields form an important buffer to this rainfall burden, soaking the water like a sponge and releasing it gradually in a way that helps stem the flow.

(3) The Green Space is local in character and is not an extensive tract of land.

The 4.6 ha area is bounded by the residential streets around Longford and Ryebank Roads to the South, St John's school and further residential streets to the East and North, and the edge of Longford Park to the West.

It is most frequently accessed by people who live within walking distance, though visitors come from further afield to see its special features, to experience its unique character and community.

[11] https://www.nature.com/articles/s41598-023-36850-6
[12] https://www.addresspollution.org/results/52933786-5550-4c8a-a5ed-48c9eb5bcc24

Preliminary Ecological Appraisal

Ryebank Fields, Chorlton-cum-Hardy, Manchester. (Grid Reference SJ811946).

Prepared by:
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February 2025

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Contents

1 Summary

This Preliminary Ecological Appraisal (PEA) was commissioned by Friends of Ryebank Fields to assess the conservation status of Ryebank Fields, Chorlton-cum-Hardy, Manchester (Grid Reference SJ811946) in connection with an application to retain the land as a community woodland and meadow.

This report details the findings of the habitat and protected species surveys, evaluates the conservation status of Ryebank Fields and recommends a course of action aimed at protecting and enhancing the biodiversity of the site.

1.1 The Main Findings

With a mosaic of habitats including woodland, aspen grove, grassland, and scrub habitats that have naturally regenerated since the area was abandoned in 1996, Ryebank Fields contributes significantly to the biodiversity of the area. It supports a rich diversity of flora and fauna, including protected species such as bats, hedgehogs, badgers, and breeding birds. The site is also home to a rare native black poplar tree and an ecologically significant hedgerow.

Ryebank Fields supports several Greater Manchester nature-based and green space initiatives including:

- The Greater Manchester Biodiversity Action Plan (GM BAP)
- Greater Manchester Draft Local Nature Recovery Strategy (LNRS)
- Manchester Green and Blue Infrastructure Strategy
-

Ryebank Fields satisfies the criteria for Local Green Space designation and qualifies for protection within the context of Greater Manchester due to its significant environmental, social, and ecological value.

The site, an important green space in an increasingly urbanised city, provides a vital habitat for local wildlife and acts as a natural carbon sink, aiding in climate change mitigation and flood prevention.

1.2 Recommendations

Ryebank Fields is an ecologically significant area that has benefited from the process of natural succession over the past 30 years. In the long term, its biodiversity has the potential to be enhanced by a minimal, ‘light touch’ conservation and management approach.

Recommendations aim to protect and enhance the biodiversity and ecological integrity of the site.

1.2.1 Key objectives

- Biodiversity Conservation: Protect existing habitats and priority species.
- Community Engagement: Continue to foster local involvement in conservation and education activities.
- Historical Preservation: Safeguard historical features.
- Sustainable Land Management: Use chemical-free methods for habitat restoration and long-term care.
- Climate Resilience: Increase carbon sequestration through woodland conservation.

1.2.2 Management of specific habitats

- Woodland Conservation: Protect mature trees and plant more native species.
- Grassland and Meadow: Implement rotational scything, encourage wildflowers, and support pollinators.
- Hedgerows and Scrub: Protect hedgerows, conduct coppicing, and enhance habitat corridors.
- Badger, Hedgehog and Bat: Protect badger setts, preserve bat and hedgehog habitats, and install bat boxes.

1.2.3 Other recommendations

- Monitoring and evaluation strategies include annual surveys, assessing habitat restoration success, and gathering community feedback through meetings and surveys.
- Inclusion of Ryebank Fields in the Greater Manchester Local Nature Recovery Strategy (LNRS) is recommended to emphasise its role in enhancing regional biodiversity.

2 Introduction

2.1 Terms of Reference and Scope of Study

Friends of Ryebank Fields (FORF) is a community organisation dedicated to preserving Ryebank Fields, a 5.07ha green space on the border of Chorlton and Stretford in South Manchester. Established in 2018, FORF aims to protect this unique wild space for the benefit of the community and its diverse flora and fauna.

A planning application is expected to be submitted imminently by Asteer Planning on behalf of Step Places, Southway Housing and Manchester Metropolitan University, to develop Ryebank Fields for housing. If the development goes ahead it will result in the irreversible loss of locally important habitats that currently support a diverse range of fauna and flora.

This Preliminary Ecological Appraisal (PEA) was commissioned by FORF to assess the conservation status of Ryebank Fields, Chorlton-cum-Hardy, Manchester (Grid Reference SJ811946) in connection with an application to retain the land as a community woodland and meadow.

This report details the findings of the habitat and protected species surveys, evaluates the conservation status of Ryebank Fields and recommends a course of action aimed at protecting and enhancing the biodiversity of the site.

2.2 Relevant Legislation

The 1994 The Conservation Regulations have been amended to allow the obsolete European Union Habitat Regulations to be transposed, almost word for word, into domestic law. This means that there is effectively no change in the laws protecting the UK's vulnerable species and habitats now that the Brexit transition period has ended.

All wild birds, their nests and their young are protected by the Wildlife and Countryside Act 1981, as amended by the Conservation of Habitats and Species Regulations 2017.

Protection in the UK is afforded to badger under the Wildlife and Countryside Act 1981 as amended by the Conservation of Habitats and Species Regulations 2017. Further protection is afforded to badger under the Protection of Badgers Act 1992.

Protection in the UK is afforded to all amphibians and reptiles under Schedule 5 of the Wildlife and Countryside Act 1981 as amended by the as amended by the Conservation of Habitats and Species Regulations 2017.

All bats their places of rest are protected by law under the 1981 Wildlife and Countryside Act (as amended) and as amended by the Conservation of Habitats and Species Regulations 2017. As 'European Protected Species', further protection is afforded to all UK bat species under the Regulation 39(1)

of the Conservation Regulations 1994 and the Conservation of Habitats and Species Regulations 2017.

It is an offence under Wildlife and Countryside Act 1981, Part II of Schedule 9 as amended by the Conservation of Habitats and Species Regulations 2017 to plant or cause the growth of Japanese knotweed, Himalayan balsam and giant hogweed.

2.3 Site Description

Ryebank Fields comprises 5.07ha mosaic of woodland, hedgerow, grassland and scrub habitats situated on the border of Chorlton and Stretford in South Manchester (Grid Reference SJ811946: See Appendix One and Two: Photos 1 to 3).

The site, a large proportion of which was formerly clay pits and subsequently pre regulations landfill, was remediated in the 1970s under the national open spaces initiative, Operation Eyesore. It was then converted into playing fields by the City Council before being entrusted to Manchester Polytechnic (now Manchester Metropolitan University) for use by students and the public. The fields were last maintained in the mid-1990s when the University relocated its sports facilities. Since being abandoned in 1996, the area has naturally transformed into a diverse habitat, now home to over 1,400 trees and a rich variety of birds, bats, mammals, and insects.

Habitats adjacent to Ryebank Fields include Longford Park, amenity grassland, semi-improved grassland, marshy grassland, hedgerow, scattered broadleaved woodland and gardens.

2.4 Proposed Housing Development

A development partnership between Step Places and Southway Housing Trust is proposing to build 120 new housing units (See Appendix Three).

According to the latest development plan some of the woodland will be retained. However, most of the remaining habitats will be lost.

3 Survey Methodology

All survey methodology follows best practice outlined in the *Guidelines for Preliminary Ecological Appraisal (2017)* published by the Institute of Chartered Ecology and Environmental Management (CIEEM) and survey guidelines relevant to each species.

3.1 Data Search

A data search was conducted to identify species records from within the boundary of Ryebank Fields.

Data sources included the Greater Manchester Local Records Centre, iNaturalist, eBird and the National Biodiversity Network Atlas (NBNA).

A search for protected areas, such as Local Nature Reserves, SSSIs, SACs and SPAs, within 1.5km of Ryebank Fields was also conducted.

3.2 Phase One Habitat Survey

A Phase One Habitat Survey was carried out in 2024 to establish baseline data on habitats present within the boundary of Ryebank Fields.

Habitats were assessed and mapped in the field using standard JNCC habitat classification.

Where necessary, target notes (TNs) were also made in the field describing features of interest.

The survey also aimed to identify the presence of non-native invasive plant species, important habitat for protected species (such as breeding habitat for birds) and habitat of high wildlife conservation value.

A final colour digital habitat map was prepared using standard JNCC codes.

3.3 Protected Species Walkover Survey

Several walkover surveys were carried out in 2024/25 to identify protected species within the boundary of Ryebank Fields.

3.3.1 Preliminary Bat Roost Assessment: Trees

Trees were surveyed from the ground with the aid of binoculars looking for features capable of supporting bat roosts, including rot holes, cracks, splits, woodpecker holes, folds, overhangs, wound callus rolls and flaking bark, and were classified as one of the following categories:

- **No Potential (Cat. 3):** No features able to support roosting bats.
- **Unknown Potential:** Tree cannot be fully assessed from ground due to size or view obscured by leaves or ivy.

- **High potential:** Tree has features with potential for roosting bats including rot holes, cracks, splits, woodpecker holes, folds, overhangs, wound callus rolls and flaking bark.

3.3.2 Bat Foraging and Commuting Habitat

The habitat within the footprint of Ryebank Fields was assessed for its potential use by bats for foraging and commuting. Based on this assessment, the habitat was categorized into the following levels:

- **High Potential**: High-quality habitat that is well-connected to the broader landscape, and likely to be used regularly by foraging bats. This includes features such as broad-leaved woodland, tree-lined watercourses, and grazed parkland. The site is in close proximity to known roosts and is connected to them. This continuous, high-quality habitat provides an ideal corridor for bat flight-paths, including river valleys, streams, hedgerows, lines of trees, and woodland edges.

- **Moderate Potential:** Habitat that is continuous and connected to the surrounding landscape, offering potential for bats to use it for flight-paths. This may include lines of trees, scrub, or linked back gardens. It also includes habitat suitable for foraging, such as trees, scrub, grassland, or water features.

- **Low Potential:** Habitat that may be used by small numbers of bats for flight-paths but is isolated and not well-connected to the surrounding landscape. Examples include gappy hedgerows or unvegetated streams. Suitable, yet isolated, habitat for foraging bats could include a lone tree (not in a parkland setting) or a small patch of scrub.

- **No Potential:** Areas without any habitat features likely to be used by commuting or foraging bats at any time of the year. This includes habitats that do not provide continuous shelter or protection for flight-lines or support insect populations that would attract foraging bats.

- **Negligible Potential:** While no obvious habitat features are present that would typically attract bats, a small degree of uncertainty remains in case of non-standard bat behaviour. These areas are unlikely to be used by bats but cannot be entirely ruled out.

3.3.3 Badger

Since 2020, the badgers at Ryebank Fields have been the subject of an ongoing study by FORF.

During the walk over surveys and the on-going study, all habitat within the footprint of Ryebank Fields was surveyed for evidence of badgers including:

- Sett entrances;
- Badger paths linking sett entrances and foraging areas;

- Tufts of black and white hair caught on barbed wire and/or outside sett entrances;
- Footprints;
- Claw marks scratched on tree trunks;
- Spoil heaps of earth outside sett entrance;
- Bedding dropped on paths or near sett entrances; and
- Latrines (droppings).

In addition, camera traps have been regularly set up overlooking the badger sett entrances to determine the status of the local badger clan.

3.3.4 Breeding Birds

All habitat within the footprint of the proposed development was assessed for suitability to support breeding birds.

3.3.5 Amphibians and Reptiles

Potential refugia (e.g. stones, logs and debris such as sheets of metal) and breeding and foraging habitat within the footprint of the proposed development were assessed.

3.3.9 Non-native Invasive Plant Species.

The site was surveyed for non-native invasive plant species such as Himalayan balsam, giant hog weed and Japanese knotweed.

4 Results

4.1 Data Search

4.1.1 Protected Species

A total of 281 species were reported from within the footprint of Ryebank Fields during the data search. This included 80 species of bird (See Appendix Four and Five), 10 terrestrial mammals (See Appendix Six), two amphibians, 90 flowering plants (See Appendix Seven), 59 insects (See Appendix Eight and Nine), 26 trees and shrubs (See Appendix Ten), one moss, one lichen and 12 fungi.

However, the number and abundance of protected species utilising the site is likely to be significantly under reported due to a lack of formal biological recording.

63 bird species were recorded within the boundary of Ryebank Fields (See Appendix Four) with a further 17 species recorded in fight above the site (See Appendix Five). Confirmed breeding birds included blackbird, blackcap, blue tit, carrion crow, chaffinch, dunnock, house sparrow, goldcrest, long tailed tit, robin, song thrush, sparrow hawk, stock dove, willow warbler and whitethroat.

Eleven species from the UK Birds of Conservation Concern Red List were reported within the boundary of Ryebank Fields during the data search, along with an additional 15 species from the Amber List (See Appendix Four).

Notable mammal species included badger, soprano pipistrelle bat, noctule bat and hedgehog.

Common toad and common frog were both recorded within the footprint of the site. Tadpoles were observed in March 2023 in a ‘bath tub pond’ located in the south western corner of the site. The bath tub was removed in 2023.

Bee orchid and northern marsh orchid are located at TN1 (See Appendix Two: Images 32 and 33). Although not currently listed as threatened species in the UK, both species of orchid face threats from habitat destruction, inadequate maintenance, and competition with other plants.

Nine species of bee were reported including the relatively uncommon dull-vented sharp tailed bee and the rufous-footed furrow bee (See Appendix Nine and Appendix Two: Image 4).

A rare native black poplar tree - *Populus Nigra Betulifolia* Clone 28 - also known as the 'Manchester' Poplar was reported at TN2 (See Appendix Twelve) on the boundary between Ryebank Fields and the Longford Park Conservation area (See Appendix Two: Image 13). The tree was confirmed as a native black poplar through a DNA test in April 2021.

In April 2021 a survey conducted by Greater Manchester Ecological Unit (GMEU) confirmed that the hedgerow at TN3 (See Appendix Twelve and

Appendix Two: Photos 29 to 31) meets ecological and regulatory thresholds under the Hedgerows Regulations 1997 for designation as an *Important Hedgerow*.

No records of Japanese knotweed, giant hog weed or Himalayan balsam were reported.

4.1.2 Protected Areas

The nearest non-designated sites included the Bridgewater Canal, Broad Ees Dole, Chorlton Ees, Hardy Farm and Meadows at Sale Waterpark Sites of Biological Interest (SBIs) which were located approximately 1044m, 1271m, 1163m, 1569m and 1609m south west of Ryebank Fields respectively (See Appendix Eleven).

Broad Ees Dole and Chorlton Ees are also designated as Local Nature Reserves

4.2 Phase One Habitat Survey Summary

Ten habitats were identified during the phase one habitat survey (See Appendix Twelve for Phase One Habitat Map and Appendix Thirteen for Target Notes).

4.2.1 A1.1.1 Semi-natural broadleaved woodland

Approximately 1.4ha of semi-natural broadleaved woodland is located on the perimeter of Ryebank Fields. Since the site was abandoned over three decades ago the woodland has naturally succeeded onto the adjacent grassland.

Woodland at TN4, along the western edge of Ryebank Fields, has good structure with a canopy, understory, field layer and ground layer all present (See Appendix Two: Photos 5 to 12). Tree species include oak, black poplar and ash with the shrub layer comprising dogwood, holly, hawthorn, elder, hazel coppice and regenerating trees. Ground flora includes ramson, wood anemone, bramble, wood sorrel and grasses.

The native black poplar reported in the data search is located at TN2 (See Appendix Two: Photo 12).

An aspen grove at TN5 comprised several mature trees along with hundreds of new sucker shoots (See Appendix Two: Photos 12 to 14).

4.2.2 A2.1 - Dense/Continuous Scrub

Several areas, totalling 1.25ha, of dense and continuous scrub dominated by bramble have developed on the edges of the semi-improved neutral grassland (See Appendix Two: Photos 18 to 21).

The scrub provided excellent potential for a variety of nesting birds and cover for mammals including fox, badger and hedgehog.

4.2.3 A3.1 - Scattered Broadleaved Trees

Scattered trees, both planted and self-seeded, were recorded throughout the site. A number of oak trees, now approximately 25 years old, were grown from locally gathered acorns and planted in 1999 to commemorate the new millennium. Self-seeded saplings recorded around the planted oaks are likely to be a result of acorns having been buried by jays and other wildlife.

The scattered trees provide valuable foraging opportunities for bats and offer nesting cover for birds. (See Appendix Two: Photos 22 to 26).

4.2.4 A3.2 Scattered Conifer trees

Two scattered Leyland cypress, also known as Leylandii, were recorded during the habitat survey.

4.2.5 B2.2 - Semi-improved Neutral Grassland

The dominant habitat within the footprint of Ryebank Fields comprised 2.36ha of semi-improved neutral grassland (See Appendix Two: Photos 27 to 33). The lack of management since the site was abandoned in 1996, has resulted in the grassland being transformed from amenity grassland with little or no biodiversity to a diverse habitat supporting a wide range of fauna and flora.

The grassland to the north of the Nico ditch at TN6 was dominated by false oat grass with abundant cocksfoot. Other species included crested dogs' tail, Yorkshire fog, meadow fox tail, ribwort plantain, sorrel, creeping thistle, and red clover.

Grass species recorded in the grassland to the south of the Nico ditch at TN7 included Yorkshire fog, cocks' foot and red fescue. Other plant species recorded during the survey comprised creeping buttercup, ragwort, meadow butter cup, lesser stitchwort, yarrow, and lesser trefoil.

Bee and northern marsh orchid are both present at TN1 (See Appendix Two: Photos 32 and 33).

The long grass provides cover for invertebrates and small mammals such as field vole and weasel.

4.2.6 C3.1 - Tall Ruderal

Several patches of tall ruderal were present within the boundary of the proposed development. Predominant species was rosebay willowherb (See Appendix Two: Photo 34).

Rosebay willowherb is beneficial for a variety of insects including pollinators such as bees, butterflies and hoverflies.

The caterpillars of the elephant hawk moth feed on the leaves whilst ladybirds and lacewings are known to feed on the aphids found on the plant.

4.2.7 J2.1.2 Intact Hedge - Species Poor

A laurel hedge is located on the southern boundary of Ryebank Fields at TN8 (See Appendix Two: Photo 35 and 36).

4.2.8 J2.3.1 Hedge with Trees – Native Species Rich

As described in the results of the data search, in April 2021 a survey conducted by Greater Manchester Ecological Unit (GMEU) confirmed that the hedgerow at TN3 (See Appendix Two: Photos 37 to 39) meets ecological and regulatory thresholds under the Hedgerows Regulations 1997 for designation as an *Important Hedgerow*.

4.2.9 J2.6 Dry Ditch

A dry ditch known as the Nico ditch was located at TN9.

Nico ditch is a historical earthwork that runs approximately 6 miles (10 km) across Greater Manchester from Ashton-under-Lyne to Stretford. It is thought to date back to the early medieval period, possibly the 8th or 9th century, and may have served as a boundary marker or defensive fortification.

The Ryebank Fields section of the ditch is obscured by bramble scrub (See Appendix Two: Photo 40).

4.2.9 J2.8 Earth Bank

An earth bank with young, scattered trees growing on it is located at TN10 (See Appendix Eleven; See Appendix Two: Photos 41 to 42).

4.2.11 J4 - Bare Ground

Hard standing was recorded at TN11 where a carpark and driveway were located when the site was used as a sports facility prior to 1996. The hard standing is gradually being invaded over by scrub and trees (See Appendix Two: Photo 43).

4.3 Protected Species

4.3.1 Preliminary Bat Roost Assessment: Trees

The majority of trees within the boundary of Ryebank Fields were relatively young and did not have any features suitable for roosting bats and were assessed as *No Potential (Cat. 3).*

However, 14 mature trees were assessed as having high or unknown potential for roosting bats. A black poplar at TN14, Norway maple at TN22 and a London Plane at TN23 all had features with potential for roosting bats (See Appendix Two: Photos 44 to 46).

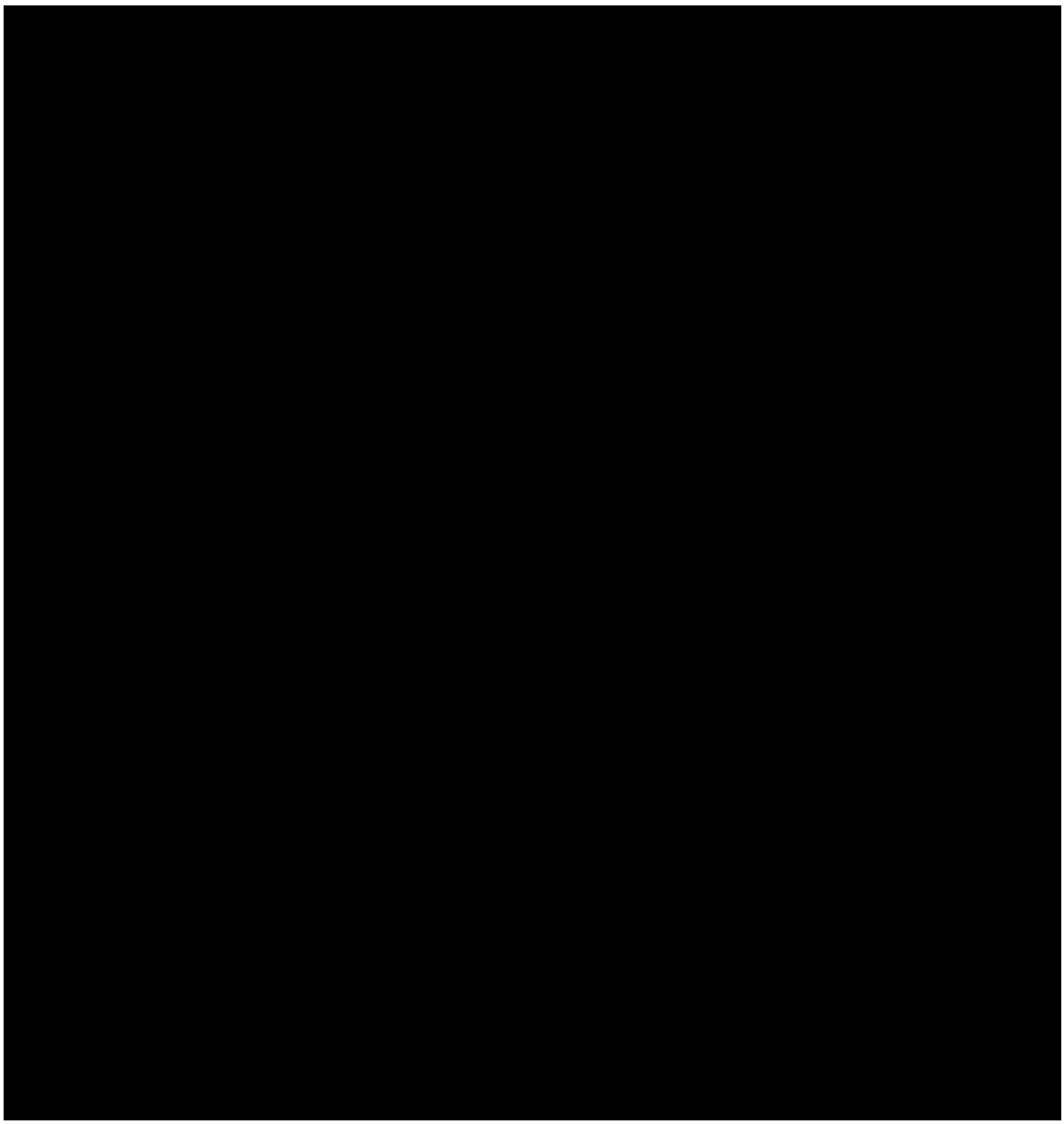
4.3.2 Bat Foraging and Commuting Habitat

The woodland, scrub, and semi-improved neutral grassland within the footprint of the proposed development all offered excellent foraging and commuting potential for bats.

The nearby houses and mature trees are also likely to provide roosting opportunities for a variety of bat species.

As a result, the habitat was assessed as having high potential for foraging and commuting bats.

4.3.3 Badger



4.3.4 Breeding Birds

The broadleaved woodland, hedges, scattered trees, and scrub within Ryebank Fields offered excellent foraging and nesting opportunities for a diverse range of bird species.

Although a data search recorded 63 bird species within the boundary of Ryebank Fields, with 16 species observed breeding, a coordinated breeding bird census would likely reveal that breeding birds have been significantly under-recorded.

The rot hole located high in the black poplar at TN15 has potential for nesting tawny owl (See Appendix Two: Photos 44).

4.3.5 Amphibians and Reptiles

Although frogs are regularly seen in Ryebank Field, no evidence of amphibian or reptile was recorded during the walkover surveys.

Terrestrial habitat favoured by both common toad and common frog includes wet/rough grasslands, woodlands, forest edges, hedgerows and ditches.

Slow worms require dense vegetation and tussock grass for cover to forage and sunny areas to bask. In Manchester they typically hibernate from October to March depending on the weather, with hibernation sites including large tussocks of grass, burrows and loose soil.

Common lizards can be found in a wide variety of habitats including heathland, moorland, woodland glades, rough grassland and embankments. In the Manchester area, they typically hibernate from October to March. As with slow worms, the exact timing depends on weather conditions. If autumn is mild, they might stay active longer, and if spring warms up early, they may emerge sooner. They usually hibernate in frost-free refuges such as burrows, rotting logs, or dense vegetation.

The habitat within the footprint of Ryebank Fields, therefore, was assessed as providing good foraging opportunities for reptiles and amphibians with several areas suitable for basking or hibernating reptiles.

4.3.6 Non-Native Invasive Plant Species

No areas of Himalayan balsam, Japanese knotweed or giant hog weed were recorded during the course of the walkover survey.

5 Ecological Assessment

Biodiversity loss in the UK is a significant environmental issue, driven by habitat destruction, climate change, pollution, invasive species, and intensive agriculture.

The UK is one of the most nature-depleted countries globally, with over 40% of species in decline and 15% at risk of extinction. For instance, over the last 20 years, hedgehog populations in the UK have declined by around 30% in urban areas due to urbanisation, habitat loss, road deaths, and food shortages caused by pesticides.

Efforts to combat biodiversity loss include conservation initiatives, rewilding projects, and government policies like the Environmental Land Management Scheme and Biodiversity Net Gain (BNG). However, urgent action is needed to restore ecosystems and prevent further declines.

With its mosaic of habitats including woodland, aspen grove, grassland, and scrub habitats that have naturally regenerated since the area was abandoned in 1996, Ryebank Fields contributes significantly to the biodiversity of the area by supporting a rich diversity of flora and fauna, including protected species such as bats, hedgehogs, badgers, and breeding birds. The site is also home to a rare native black poplar tree and an ecologically significant hedgerow.

Ryebank Fields also qualifies for, and supports several Greater Manchester Combined Authority (GMCA) nature-based and green space initiatives including:

- The Greater Manchester Biodiversity Action Plan (GM BAP)
- Greater Manchester Draft Local Nature Recovery Strategy (LNRS)
- Local Green Space (LGS)

5.1 The Greater Manchester Biodiversity Action Plan (GM BAP)

The Greater Manchester Biodiversity Action Plan (GM BAP) highlights key species and habitats that are locally significant and require focused conservation efforts to ensure their preservation and improvement. These species and habitats were chosen based on their status in the UK Biodiversity Action Plan and their relevance to the Greater Manchester area.

Priority species supported by Ryebank Fields include:

- Bats
- Native Black Poplar
- Farmland Birds
- Hedgehog

- Willow Tit

Priority habitats supported by Ryebank Fields include:

- Grasslands
- Hedgerows
- Native woodlands
- Urban managed greenspace

5.2 GMCA Local Nature Recovery Strategy (LNRS)

The Greater Manchester Combined Authority (GMCA) has developed a draft Local Nature Recovery Strategy (LNRS) aimed at fostering nature's recovery across the city-region. This strategy outlines a vision to create a resilient network for nature, connecting and enhancing wild spaces to benefit both people and wildlife. It serves as a roadmap detailing collaborative efforts and priority areas to maximize impact.

The draft LNRS identifies 16 priority species and groups of species that are particularly at risk locally and in need of bespoke conservation action.

Priority species supported by Ryebank Fields include:

- Willow Tit
- Swift
- Hedgehog
- Black Poplar
- Common Toad

The draft LNRS also identifies six broad habitat types that are priorities for the area.

Habitat types supported by Ryebank Fields include:

- Woodland, trees, scrub, and hedgerows
- Grassland, *[farmland, and lowland heath]*
- Urban green spaces *[and buildings]*

Although neighbouring Longford Park is included in the draft LNRN, Ryebank Fields has been omitted. However, a number of agencies, including the two Local Wildlife Trusts, have advocated for Ryebank Fields to be additionally included via the recent consultation round which closed on January 31 2025.

5.3 Local Green Space (LGS)

Local Green Space (LGS) confers protection similar to Green Belt status and is intended to protect green spaces of particular importance to a local community. To qualify for LGS designation, a green space must meet specific criteria outlined in the National Planning Policy Framework (NPPF).

Criteria to qualify as an LGS includes:

- Proximity: The green space should be in reasonably close proximity to the community it serves.
- Special Significance: It must be demonstrably special to the local community, holding particular local significance due to factors such as beauty, historic importance, recreational value, tranquillity, or richness of wildlife.
- Local Character: The area should be local in character and not constitute an extensive tract of land.

It's important to note that LGS designation can only occur during the preparation or review of a local or neighbourhood plan. Therefore, engaging with local planning authorities during these times is crucial to advocate for the protection of valued green spaces.

FORF responded to the Local Plan consultation in 2020 proposing Ryebank Fields as a LGS. Although the process has been postponed several times, GMCA replied in summer 2024 confirming: "The material you previously sent in 2020 effectively fulfils the requirements set out in national guidance to enable its consideration within the Local Plan. This will be considered alongside the wider evidence base and any relevant national legislation/guidance."

5.4 Biodiversity Net Gain (BNG)

Biodiversity Net Gain (BNG) is a legal requirement in England under the Environment Act 2021. It requires developers to assess the biodiversity value of a site before and after development, aiming for at least a 10% net gain in biodiversity. This is achieved through habitat creation, restoration, or off-site compensation if necessary.

A baseline BNG score is the initial assessment of a site's biodiversity value before any development or enhancements take place. It is typically measured using biodiversity units, which are calculated based on factors like habitat type, size, distinctiveness, condition, and strategic significance.

Although Ryebank Fields would be allocated a relatively high baseline BNG score if calculated, determining this score is unnecessary at this time since the Ryebank Fields Community Group’s proposal does not involve developing the site.

6 Conclusion

Ryebank Fields qualifies for protection within the context of Greater Manchester due to its significant environmental, social, and ecological value.

The site, an important green space in an increasingly urbanised city, provides a vital habitat for local wildlife, including many protected species, and acts as a natural carbon sink, aiding in climate change mitigation and flood prevention.

7 Recommendations

7.1 Aims

Ryebank Fields is an ecologically significant area that has benefited from the process of natural succession over the past 30 years. In the long term, its biodiversity has the potential to be enhanced by a minimal, 'light touch' conservation and management approach.

The following recommendations aim to protect and enhance the biodiversity and ecological integrity of the site. However, it is recognised that decisions to be taken around implementing any of the proposed recommendations would need to be the product of discussion amongst the community and other key stakeholders and subject to availability of resources, future ownership, and further specialist advice.

7.2 Management Objectives

7.2.1 Biodiversity Conservation

Maintain and enhance existing habitats to support wildlife populations, particularly priority species identified in the Greater Manchester Biodiversity Action Plan.

7.2.2 Community Engagement

Continue to support and grow the existing community connection through ecological, cultural, educational and recreational activities and by introducing improved accessibility measures and outreach events.

7.2.3 Historical Preservation

Protect features of historical significance, such as the Nico ditch and the treeline boundary within the historic Longford Conservation Area, in a way that also respects their value as important wildlife corridors.

7.2.4 Sustainable Land Management

Implement best practices for habitat restoration and long-term maintenance without the use of harmful chemicals.

7.2.5 Climate Resilience

Enhance carbon sequestration through woodland conservation and habitat management initiatives.

7.3 Habitat Management

7.3.1 Woodland Conservation

- Maintain semi-natural broadleaved woodland.
- Protect mature trees, especially those with potential bat roosts.
- Plant additional native tree species to enhance canopy diversity.
- Consider management options for the aspen grove including recommendations to mitigate the impact of succession onto the semi-improved neutral grassland.

7.3.2 Grassland and Meadow Management

- Implement of a programme of rotational cutting to encourage wildflower growth and maintain habitat for pollinators.
- Leave sections of grassland uncut to support invertebrates and small mammals.
- Introduce additional wildflower species to improve plant diversity.

7.3.3 Hedgerow and Scrub Management

- Protect and extend species-rich hedgerows.
- Conduct periodic coppicing to maintain structural diversity.
- Enhance habitat corridors by linking hedgerows with additional planting.

7.3.4 Badger, Hedgehog and Bat Conservation

- Protect and buffer known badger setts from disturbance.
- Protect high-value bat foraging and commuting routes.
- Install bat boxes in suitable locations to support roosting.
- Protect existing hedgehog habitat for foraging and wildlife corridors allowing hedgehogs to move safely in search of food, mates, and shelter.
- Maintain long grass, logs piles, and leaf piles for shelter and food sources.

7.4 Monitoring and Evaluation

7.4.1 Biodiversity Monitoring

- Conduct annual surveys of key species and habitats.
- Engage local universities and citizen scientists in monitoring efforts.
- Maintain a central database of ecological data.

7.4.2 Habitat Management Review

- Assess the success of habitat restoration efforts annually.
- Adapt management techniques based on ecological findings.
- Report progress to stakeholders and the local community.

7.4.3 Community Feedback

- Host public meetings to gather input on site management.
- Conduct periodic visitor surveys to assess community engagement.
- Adjust educational and recreational programs based on feedback.

7.5 Greater Manchester Combined Authority (GMCA) draft Local Nature Recovery Strategy (LNRS)

It is recommended that the inclusion of Ryebank Fields in the LNRS is reconsidered by GMCA allowing its existing and potential benefits for nature to be highlighted whilst contributing to and enhancing the region's habitat and wildlife connectivity.

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9 Appendices

9.1 Appendix One: Map Showing the Location of Ryebank Fields

9.2 Appendix Two: Site Photographs

Photo 1: Image showing an aerial view of Ryebank Fields from the south.

Photo 2: Image showing an aerial view of Ryebank Fields from the north.

Photo 3: Image showing an aerial view of Ryebank Fields and its close proximity to the City of Manchester.

Photo 4: Images showing a selection of pollinators recorded at Ryebank Fields (Images: Jay Clarke).

Photo 5: Image showing broadleaved woodland at TN4.

Photo 6: Image showing broadleaved woodland at TN4.

Photo 7: Image showing broadleaved woodland at TN4.

Photo 8: Image showing broadleaved woodland at TN4.

Photo 9: Image showing broadleaved woodland at TN4.

Photo 10: Image showing broadleaved woodland at TN4.

Photo 11: Image showing 140-year-old Hybrid Poplar trees *P. nigra x P. deltoides* emerging from important hedgerow and broadleaved woodland at TN4 (Image: Jay Clarke).

Photo 12: Image broadleaved woodland at TN4 (Image: Jay Clarke).

Photo 13: Image of the native black poplar at TN2 (Image: Jay Clarke).

Photo 14: Image showing aspen grove at TN5.

Photo 15: Image showing aspen grove at TN5.

Photo 16: Image showing aspen grove at TN5.

Photo 17: Image showing aspen grove at TN5.

Photo 18: Image highlighting the location of some of the areas of scrub.

Photo 19: Image showing example of scrub habitat.

Photo 20: Image showing example of scrub habitat.

Photo 21: Image showing example of scrub habitat.

Photo 22: Image highlighting the location of the scattered trees.

Photo 23: Image showing scattered oak tree .

Photo 24: Image showing scattered oak trees (Image: Jay Clarke).

Photo 25: Image showing scattered trees (Image: Jay Clarke)

Photo 26: Image showing scattered trees (Image: Jay Clarke)

Photo 27: Image showing semi-improved neutral grassland at TN6.

Photo 27: Image showing semi-improved neutral grassland meadow buttercups at TN7.

Photo 28: Image showing semi-improved neutral grassland meadow buttercups at TN7 (Image: Jay Clarke).

Photo 29: Image showing semi-improved neutral grassland with red clover at TN7 (Image: Jay Clarke).

Photo 30: Image showing semi-improved neutral grassland with ragwort and creeping thistle at TN7 (Image: Jay Clarke).

Photo 31: Image showing semi-improved neutral grassland with creeping thistle at TN7 (Image: Jay Clarke).

Photo 32: Image showing northern marsh orchid at TN1 (Image: Jay Clarke).

Photo 33: Image showing bee orchid at TN1.

Photo 34: Image showing example of tall ruderal with rose bay willowherb (Image: Jay Clarke).

Photo 35: Image showing species poor intact laurel hedge at TN8.

Photo 36: Image showing species poor intact laurel hedge at TN8.

Photo 37: Image showing species rich hedge with trees at TN3

Photo 38: Image showing holly in native species rich hedge with trees at TN3

Photo 39: Image showing hazel coppice in native species rich hedge with trees at TN3

Photo 40: Image showing the location of the dry ditch known as the Nico ditch at TN9.

Photo 41: Image showing earth bank at TN10.

Photo 42: Image showing earth bank at TN10.

Photo 43: Image showing the hard standing at TN11 with scrub and self-seeded silver birch.

Photo 44: Image showing tree with high potential for roosting bats at TN15

Photo 45: Image showing tree with high potential for roosting bats at TN23

Photo 46: Image showing tree with high potential for roosting bats TN24

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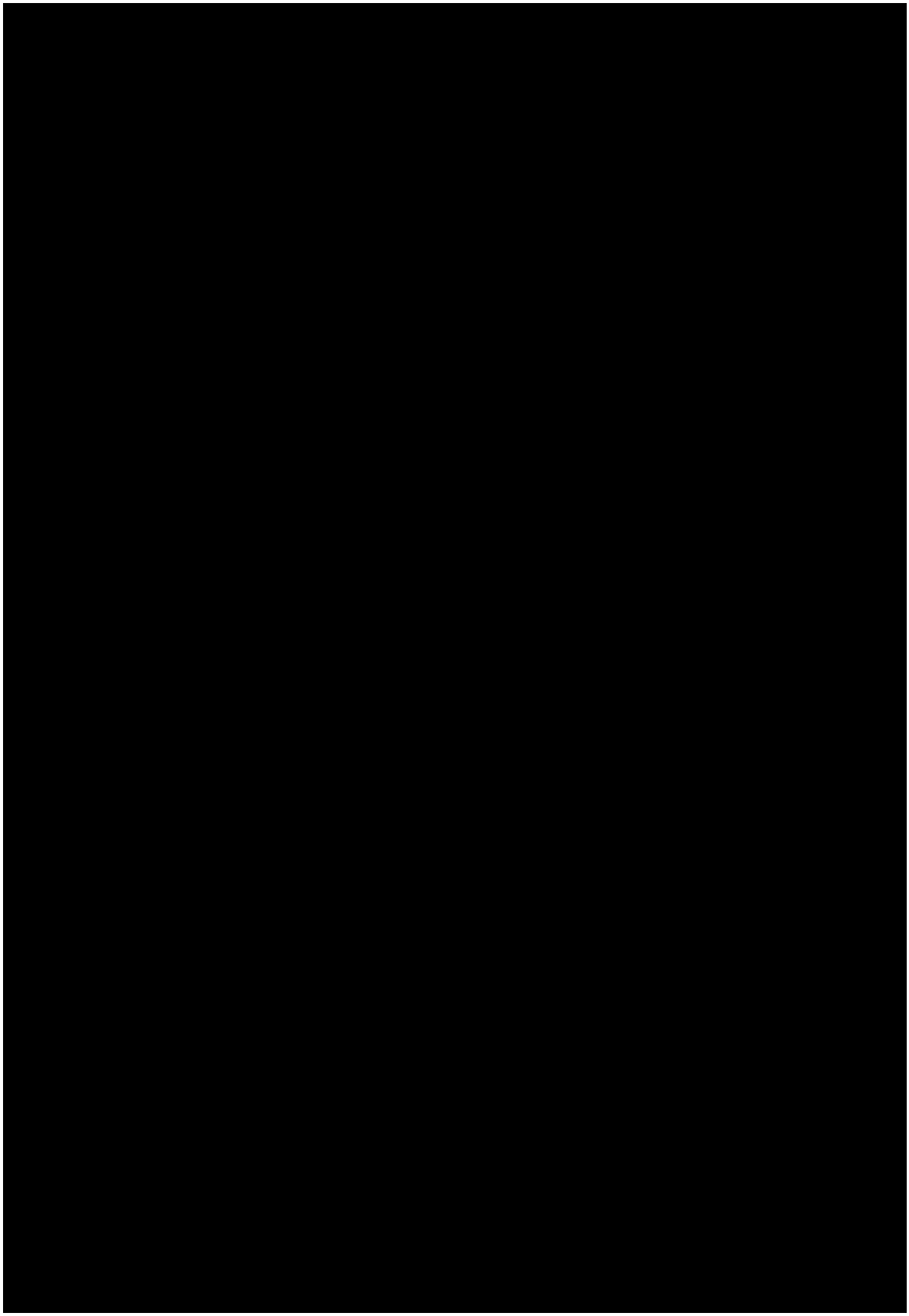
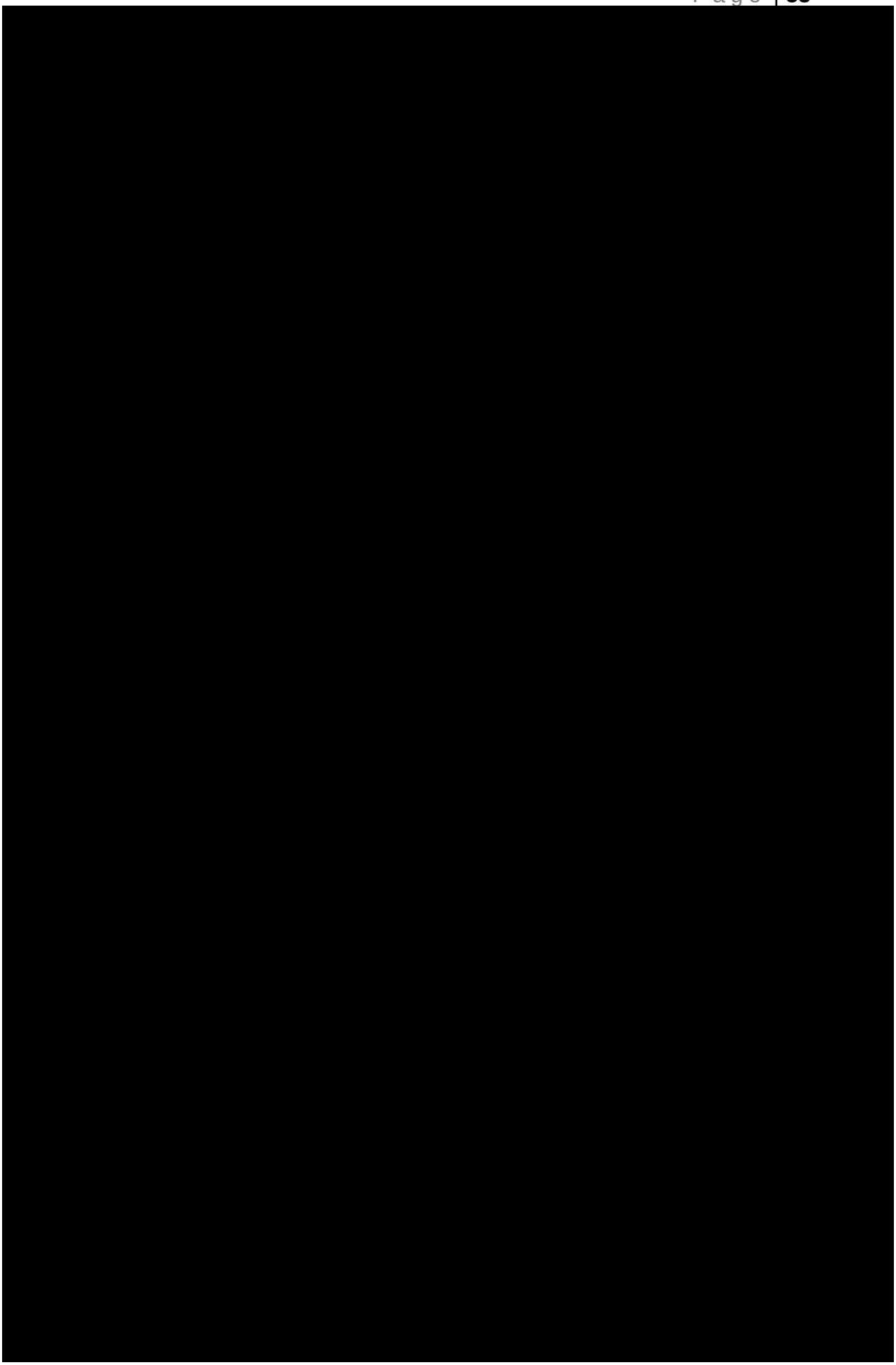
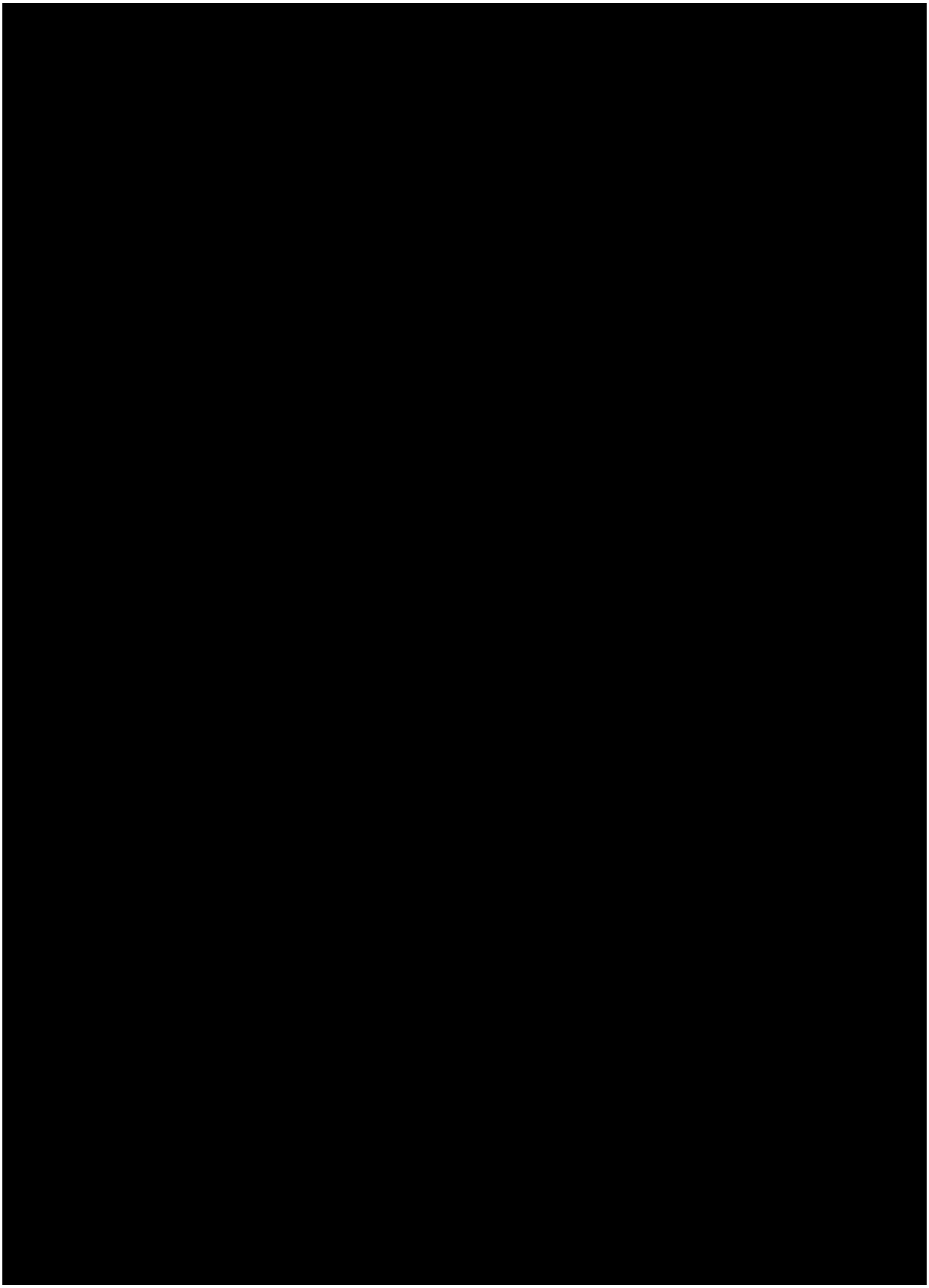
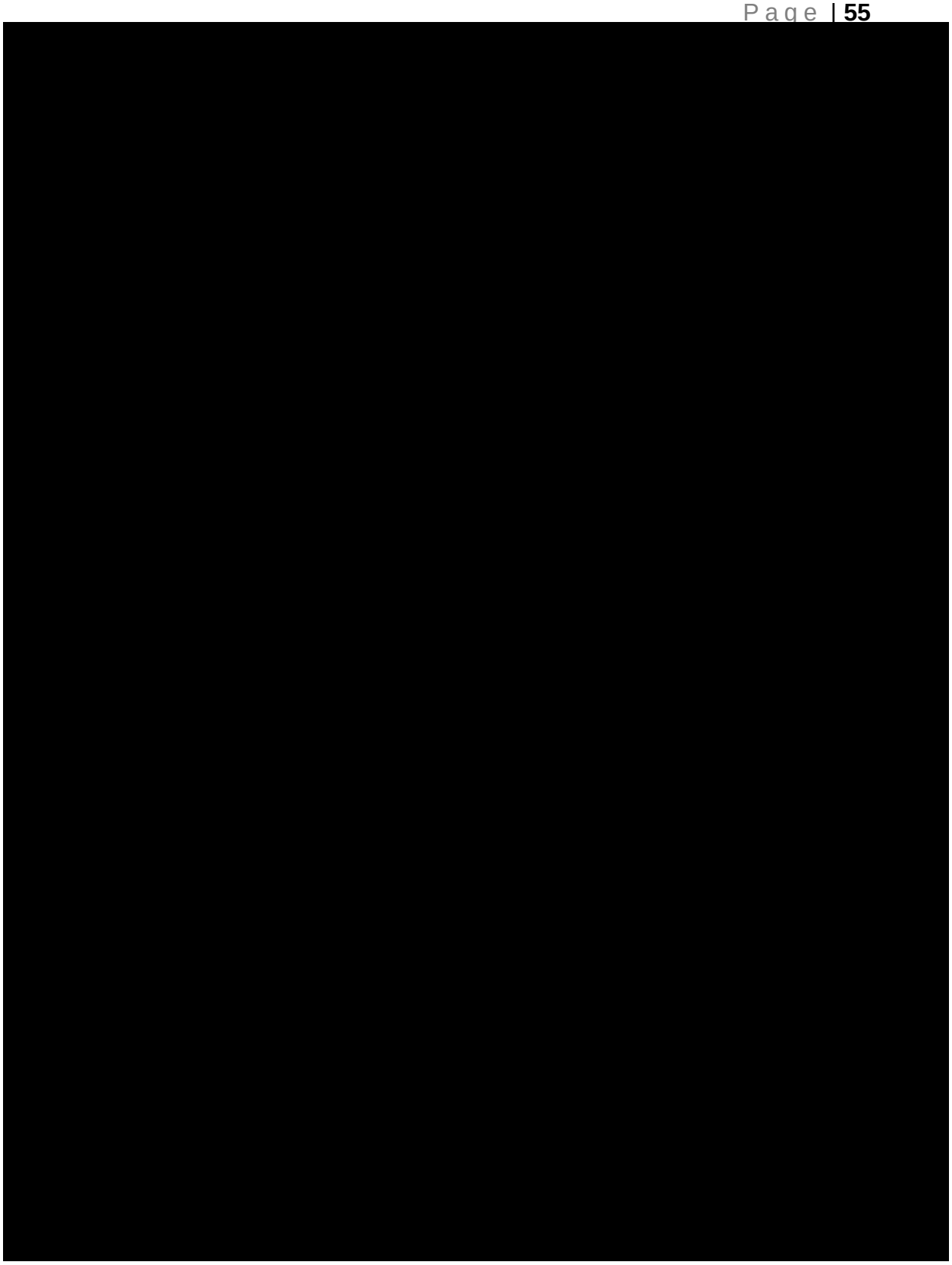
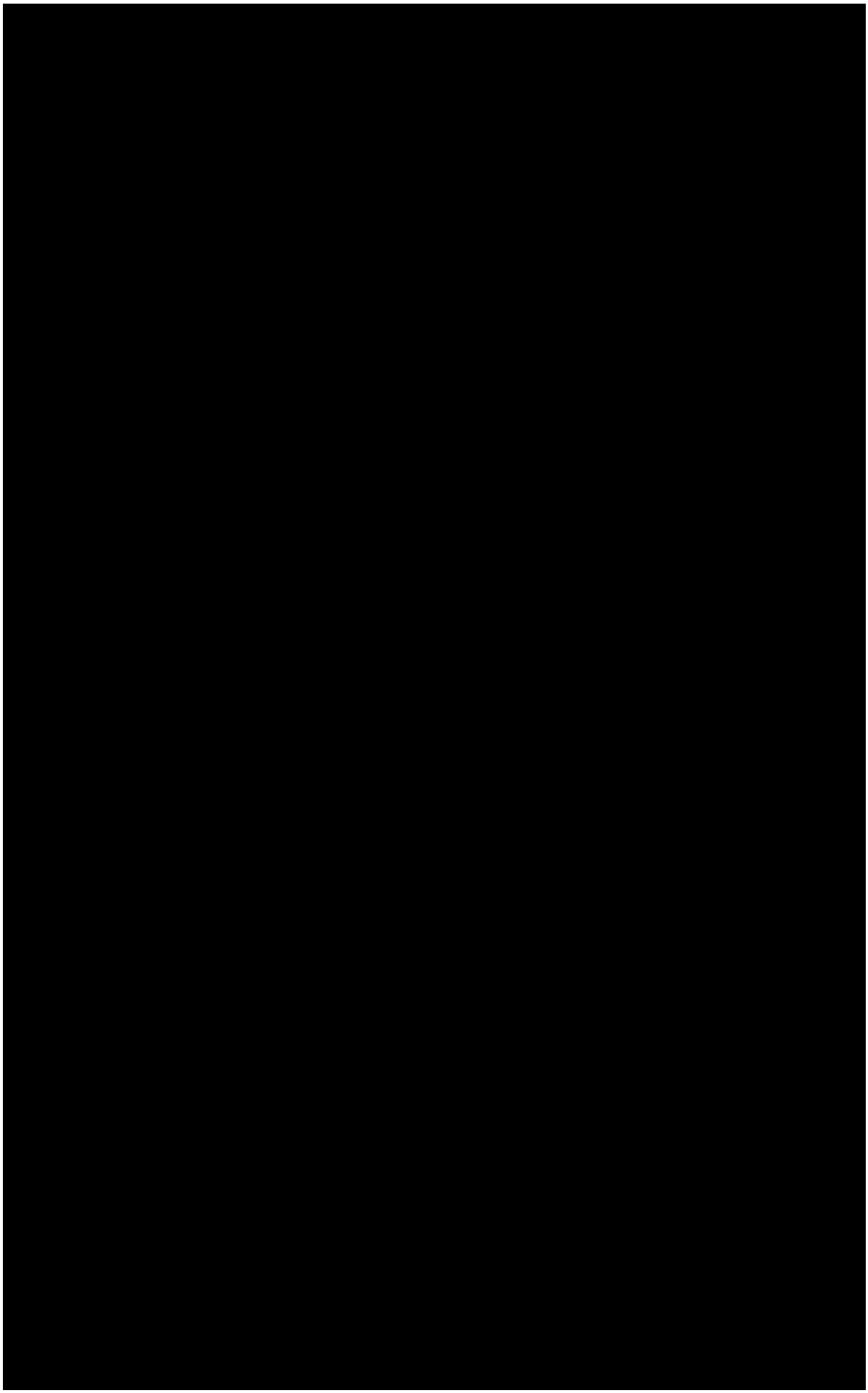
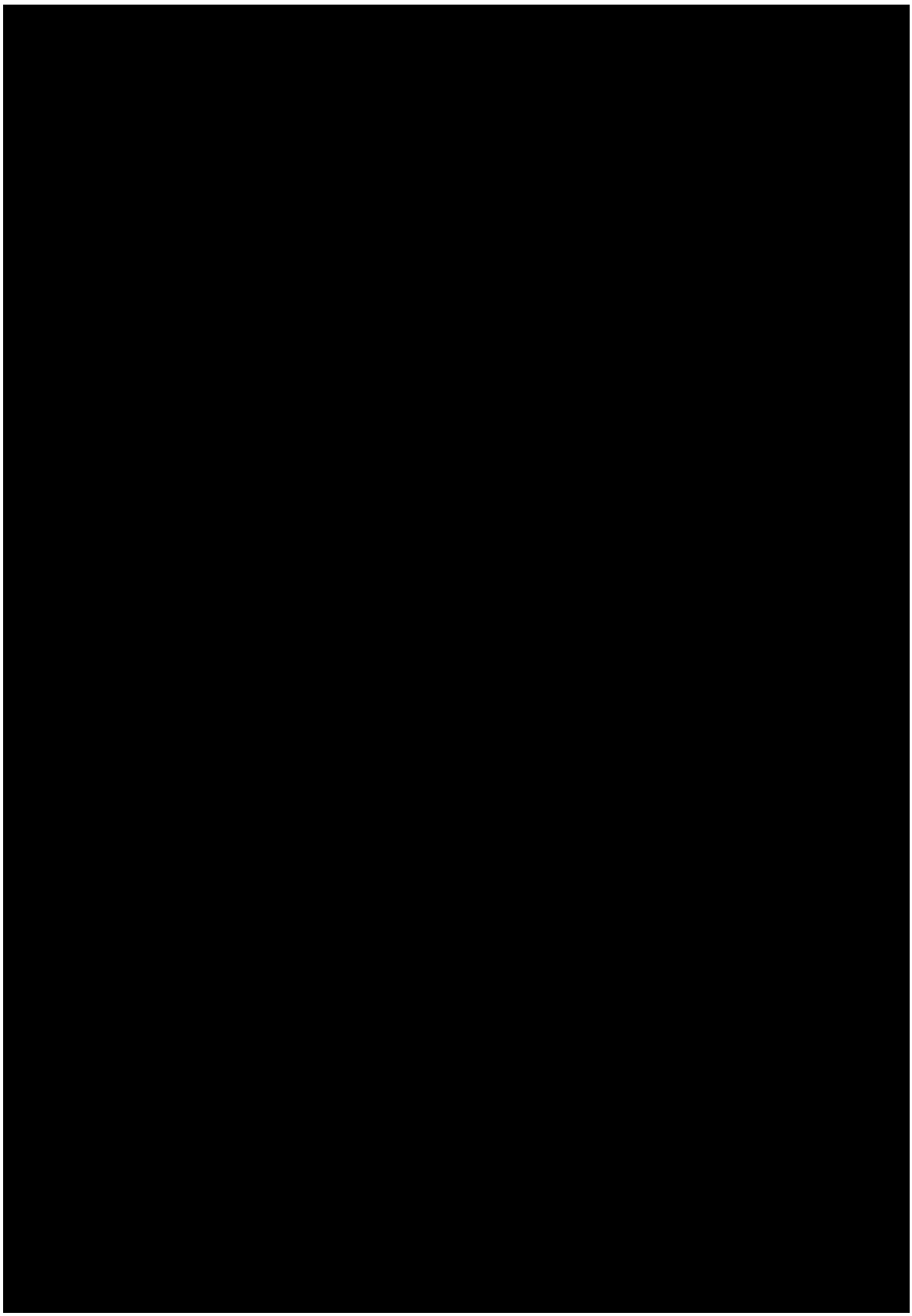


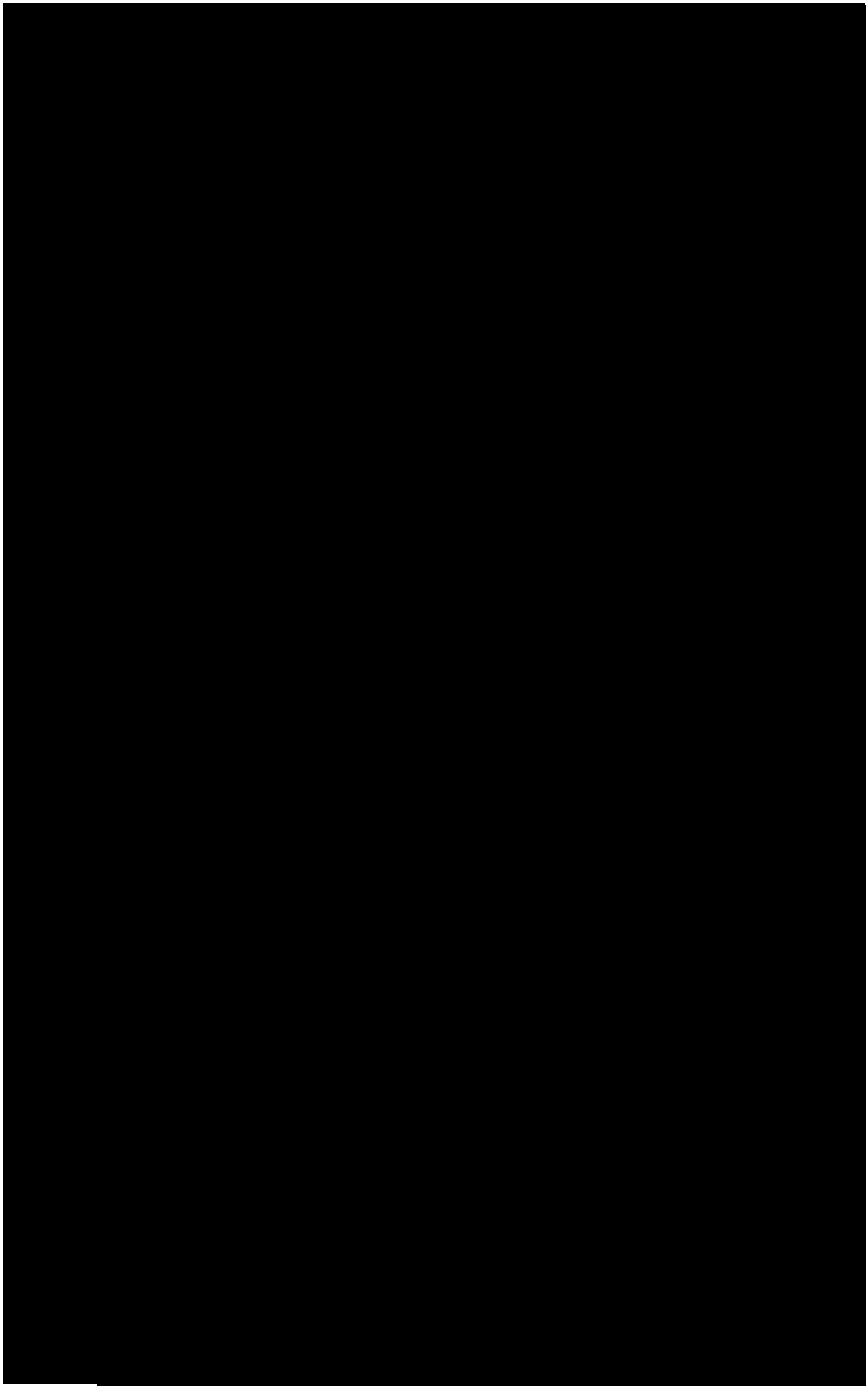












9.3 Appendix Three: Plans of the Proposed New Housing Development.

9.4 Appendix Four: Birds reported in the data search highlighting species that on Red and Amber list of Birds of Conservation Concern.

Table One: Birds reported in the data search highlighting species that on Red and Amber list of Birds of Conservation Concern.			
Blackbird (Breeding)	Dunnock (Breeding)	Long-tailed Tit (Breeding)	Spotted flycatcher
Blackcap (Breeding)	Great black backed gull	Mallard	Sparrowhawk (Breeding)
Black-headed gull	Goldfinch	Magpie	Starling
Blue tit (Breeding)	Goldcrest (breeding)	Meadow pipit	Swallow
Bullfinch	Great spotted woodpecker	Mistle thrush	
Buzzard	Great tit	Nuthatch	Tree pipit
Carrion crow (Breeding)	Greenfinch	Peregrine	Stock dove (Breeding)
Chaffinch (Breeding)	Grey heron	Pied wagtail	Tree creeper
Coal tit	Herring gull	Reed bunting	Tawny owl
Collared dove	Hobby	Redwing	Willow warbler (Breeding)
Common chiffchaff	House martin	Redpoll	Whitethroat (Breeding)
Common gull	House sparrow (Breeding)	Ring-necked parakeet	Great spotted woodpecker
Dunnock (Breeding)	Jackdaw	Robin (Breeding)	Woodcock
Feral pigeon	Jay	Rook	Woodpigeon
Garden warbler	Lesser black-backed gull	Siskin	Wren
Grasshopper warbler	Kestrel	Song thrush (Breeding)	

9.5 Appendix Five : Birds reported in flight above Ryebank Fields in the data search.

Table Two: Birds reported in flight above Ryebank Fields in the data search.			
Brambling	Heron	Merganser	Skylark
Canada goose	Lapwing	Moorhen	Swift
Cormorant	Linnet	Mute swan	
Curlew	Little egret	Pink footed goose	
Fieldfare	Little grebe	Raven	

9.6 Appendix Six: Table summarising the preferred habitats and conservation status for mammals reported in the data search

Table Three: Table summarising the preferred habitats and conservation status for mammals reported in the data search. Conservation Status is based on the IUCN Red List.		
Species	Conservation Status	Habitat Preferences
Pipistrelle Bat	Least Concern	Urban areas, woodlands, forests, agricultural land, near water
Fox	Least Concern	Woodlands, grasslands, urban areas, agricultural land
Badger	Least Concern	Woodlands, hedgerows, grasslands, farmlands, coastal areas
Noctule Bat	Least Concern	Woodlands, forests, parks, near rivers, rural areas
Soprano Pipistrelle	Least Concern	Woodland, urban areas, parks, farmland, near water bodies
Hedgehog	Vulnerable (declining)	Woodland edges, hedgerows, gardens, grasslands, parks
Weasel	Least Concern	Woodlands, grasslands, agricultural land, hedgerows, rural areas

9.7 Appendix Seven: Table summarizing the preferred habitats and conservation status of the flowering plants reported in the data search.

Table Four: Table summarising the conservation status of flowering plants reported in the data search. Conservation Status is based on the IUCN Red List.		
Species	**Conservation Status**	**Notes**
Bee Orchid	Common (Least Concern) Declining/Under Threat in UK	Habitat loss affecting population
Bindweed	Common (Least Concern)	Widespread and resilient
Bluebell (spn/hyb)	Protected (Native) / Invasive (Spanish Hybrid)	Native Bluebell protected; Spanish hybrid invasive
Bramble	Common (Least Concern)	Found in a variety of habitats
Broad-leaved Dock	Common (Least Concern)	Often considered a weed
Bull Thistle	Common (Least Concern)	Native thistle species
Broad-leaved Willowherb	Common (Least Concern)	No conservation concerns
Butterfly-bush	Invasive Species	Spreads rapidly, outcompeting native plants
Cat's-ear	Common (Least Concern)	Similar to dandelion
Cleavers	Common (Least Concern)	Prolific and widespread

Species	Conservation Status	Notes
Cock's-foot	Common (Least Concern)	Common grass species
Common Cleavers	Common (Least Concern)	Sticky weed, widespread
Common Dog-violet	Common (Least Concern)	Important for butterflies
Common Mugwort	Common (Least Concern)	No conservation concerns
Common Mouse-ear	Common (Least Concern)	Small flowering plant
Common Nettle	Common (Least Concern)	Beneficial for butterflies
Common Sallow	Common (Least Concern)	A willow species, important for pollinators
Common Sorrel	Common (Least Concern)	Widespread in grasslands
Common Vetch	Common (Least Concern)	A nitrogen-fixing legume
Cornus (Dogwood)	Common (Least Concern)	Shrub/tree species, various types
Cotoneaster	Invasive Species	Non-native, spreads aggressively
Cow Parsley	Common (Least Concern)	Widespread in hedgerows
Creeping Buttercup	Common (Least Concern)	Can become invasive in gardens
Creeping Thistle	Common (Least Concern)	Native but can be invasive
Crested Dog's-tail	Common (Least Concern)	A common grass species
Cuckoo Flower	Common (Least Concern)	Important for Orange-tip butterflies
Daisy	Common (Least Concern)	Found in grasslands and lawns
Dog Rose	Common (Least Concern)	Native hedgerow species
Dandelion Agg.	Common (Least Concern)	Important for pollinators
Druce's Crane's-bill	Common (Least Concern)	Less common than other geraniums
False Oat Grass	Common (Least Concern)	Widespread grass species
Field Forget-me-not	Common (Least Concern)	No conservation concerns
Field Mouse-ear	Common (Least Concern)	Small flowering plant
German Chamomile	Common (Least Concern)	Often used in herbal medicine
Garlic Mustard	Common (Least Concern)	Host plant for Orange-tip butterflies
Goat Willow	Common (Least Concern)	Supports early pollinators
Goat's-beard	Common (Least Concern)	Also called "Jack-go-to-bed-at-noon"
Great Willowherb	Common (Least Concern)	Thrives in damp areas
Greater Stinging Nettle	Common (Least Concern)	Beneficial for butterflies
Greater Plantain	Common (Least Concern)	Found in compacted soils
Ground-elder	Invasive Species	Spreads aggressively
Hairy Vetch	Common (Least Concern)	Legume species
Herb Robert	Common (Least Concern)	Wild geranium species
Hairy Sedge	Common (Least Concern)	Found in wetlands
Hard Rush	Common (Least Concern)	Common in damp areas
Ivy-leaved Speedwell	Common (Least Concern)	Small creeping plant
Ivy	Common (Least Concern)	Important for winter pollinators
Jointed Rush	Common (Least Concern)	Found in wet habitats
Leek	Cultivated/Non-Native	Occasionally found wild
Lenten Rose	Cultivated/Non-Native	A garden plant, not a true rose
Lesser Celandine	Common (Least Concern)	One of the first spring flowers
Lesser Trefoil	Common (Least Concern)	Small yellow-flowered clover
Lords and Ladies	Common (Least Concern)	Toxic, but widespread woodland plant
Marsh Foxtail	Common (Least Concern)	Found in wetlands

Species	Conservation Status	Notes
Meadow Salsify	Common (Least Concern)	Resembles Goat's-beard
Meadow Buttercup	Common (Least Concern)	Widespread in grasslands
Meadow Fescue	Common (Least Concern)	A grass species
Mugwort	Common (Least Concern)	Used in traditional medicine
Meadow Foxtail	Common (Least Concern)	A typical grassland species
Northern Marsh Orchis	Common (Least Concern) Declining/Under Threat in UK	Threatened by habitat loss due to human activities
Orange Hawkweed	Invasive Species	Non-native, spreads in meadows
Oxford Ragwort	Invasive Species	Originally from Sicily, spreads rapidly
Pale Persicaria	Common (Least Concern)	Found in damp areas
Pampas Grass	Invasive Species	Introduced ornamental grass
Perennial Rye-grass	Common (Least Concern)	Used in agriculture
Ragwort	Common (Least Concern)	Important for Cinnabar Moth caterpillars
Ramsons (Wild Garlic)	Common (Least Concern)	Found in woodlands
Raspberry	Common (Least Concern)	Cultivated and wild forms
Red Bartsia	Common (Least Concern)	Semi-parasitic plant
Red Clover	Common (Least Concern)	Beneficial for pollinators
Red Fescue	Common (Least Concern)	A grass species
Redshank	Common (Least Concern)	Found in damp soils
Reed Canary-grass	Common (Least Concern)	Found in wetland areas
Ribwort Plantain	Common (Least Concern)	Widespread, used in herbal medicine
Rock Crane's-bill	Common (Least Concern)	A type of geranium
Rose	Common (Least Concern)	Various species, including wild and cultivated types
Rosebay Willowherb	Common (Least Concern)	Pioneer species in disturbed areas
Rough Meadow-grass	Common (Least Concern)	Widespread grass species
Russian Spiraea	Invasive/Non-Native	Introduced ornamental plant that can spread
Smooth Vetch	Common (Least Concern)	Legume species, beneficial for pollinators
Smooth Meadow-grass	Common (Least Concern)	A widespread grass species
Snowdrop	Common (Least Concern) / Some Native Species Protected	Many cultivated varieties, some native populations under conservation interest
Spear Thistle	Common (Least Concern)	Native thistle species, supports insects
Spanish Bluebell	Invasive Species	Hybridizes with native Bluebell, threatening its genetic integrity
Syringa (Lilac)	Cultivated/Non-Native	Common ornamental shrub
Tufted Vetch	Common (Least Concern)	Important for pollinators
White Clover	Common (Least Concern)	Valuable for nitrogen-fixing and pollinators
Wood Avens	Common (Least Concern)	Widespread woodland plant
Yorkshire-fog	Common (Least Concern)	A common grass species in meadows and pastures
Yellow Archangel	Common (Least Concern) / Invasive (Garden Variety)	Native species is fine, but variegated garden forms can become invasive
Rough Meadow-grass	Common (Least Concern)	Widespread grass species
Russian Spiraea	Invasive/Non-Native	Introduced ornamental plant that can spread

9.8 Appendix Eight: Table summarizing the preferred habitats and conservation status of the invertebrates reported in the data search.

Table Five: Table summarizing the preferred habitats and conservation status of the invertebrates reported in the data search.

Species	Preferred Habitat	Conservation Status
Speckled Wood	Woodlands, gardens, and hedgerows; prefers dappled sunlight	Common and widespread
Comma	Woodland clearings, gardens, and hedgerows; often found near nettles	Common and widespread
Large White	Gardens, fields, and meadows; commonly associated with cultivated brassicas	Common and widespread
Meadow Brown	Grasslands, meadows, and roadside verges; favours tall grasses	Common and widespread
Peacock	Gardens, parks, and woodland edges; often found near nettles	Common and widespread
Small Skipper	Grasslands, meadows, and roadside verges; prefers areas with abundant grasses	Common and widespread
Small Tortoiseshell	Gardens, meadows, and urban areas; commonly associated with nettles	Common and widespread
Small White	Gardens, fields, and meadows; often found near brassicas	Common and widespread
Pale Straw Pearl	Information on preferred habitat is limited	Data not available
Narrow-bordered Five-spot Burnet	Rough grasslands, calcareous grasslands, undercliffs, roadside verges, embankments, woodland clearings	Common and widespread
Cinnabar	Grasslands, meadows, and disturbed areas; often found near ragwort	Common and widespread
Apple Leaf Miner	Orchards and areas with apple trees; larvae mine apple leaves	Data not available
Black-headed Dwarf	Information on preferred habitat is limited	Data not available
Essex Skipper	Grasslands, meadows, and roadside verges; prefers areas with abundant grasses	Common and widespread
Gatekeeper	Hedgerows, woodland edges, and grasslands; often found near bramble	Common and widespread
Lesser Meadow Katydid	Wet meadows, marshes, and grasslands; prefers areas with tall grasses	Data not available
Roesel's Bush Cricket	Grasslands, meadows, and roadside verges; favours tall, ungrazed grasses	Data not available
Hairy Shieldbug	Various habitats including gardens, woodlands, and grasslands; often found on a variety of plants	Data not available
Cow Parsley Leaf Beetle	Hedgerows, woodland edges, and areas where cow parsley (Anthriscus sylvestris) is abundant	Data not available
Druce's Crane's-bill Beetle	Information on preferred habitat is limited	Data not available
Nettle Weevil	Gardens, woodlands, and areas with abundant nettles	Data not available
Common Red Soldier Beetle	Meadows, grasslands, and gardens; often found on flowers such as hogweed and cow parsley	Data not available
Meadow Spittlebug	Meadows, grasslands, and gardens; nymphs create characteristic frothy spittle masses on plants	Data not available
Two-spotted Lady Beetle	Various habitats including gardens, woodlands, and grasslands; often found on a variety of plants	Data not available
Sloe Bug	Hedgerows, woodlands, and areas with blackthorn (Prunus spinosa)	Data not available
Seven-spotted Lady Beetle	Various habitats including gardens, woodlands, and grasslands; often found on a variety of plants	Data not available

Species	Preferred Habitat	Conservation Status
Asian Lady Beetle	Various habitats including gardens, woodlands, and grasslands; often found on a variety of plants	Data not available
Patchwork Leafcutter Bee	Gardens, meadows, and areas with abundant flowering plants; nests in cavities	Data not available
Timothy Grassbug	Grasslands and meadows; associated with timothy grass (Phleum pratense)	Data not available
Green Shieldbug	Various habitats including gardens, woodlands, and grasslands; often found on a variety of plants	Data not available
Notch-horned Cleg	Long grasslands and damp woodlands.	Common and widespread.
Oak marble gall wasp	Associated with oak trees, particularly the native species *Quercus robur* and *Q. petraea*.	Introduced species.
Nursery Web Spider	Grasslands, meadows, and woodland edges; constructs nursery webs for its young	Data not available
Xysticus cristatus	Grasslands, meadows, and heathlands; often found on low vegetation or the ground	Data not available

9.9 Appendix Nine: Table summarising the preferred habitats and conservation status bees reported in the data search

Table Six: Table summarising the preferred habitats and conservation status of bees reported in the data search

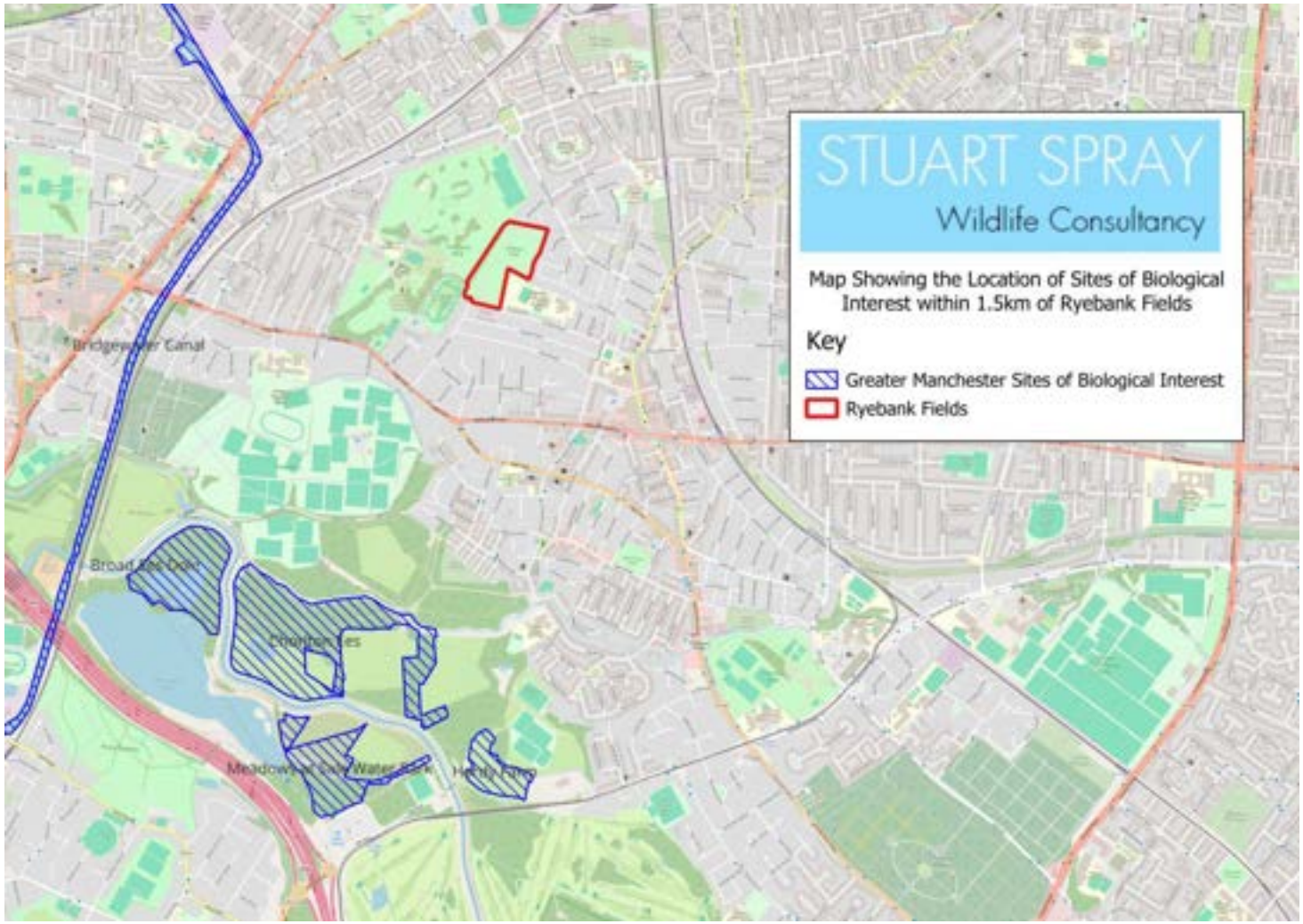
Species	Preferred habitat	Conservation Status
Western honey bee	Woodland, grassland and gardens.	Domestic
Common carder bumble bee	Feeds on a variety of wild flowers, including nettles knapweed, vetches, red and white clover, brambles and fruit trees.	Common and widespread
Tawney mining bee	Parks and gardens.	Common and widespread
Fabricius' nomad bee	Gardens, parks, allotments, churchyards, meadows, coasts, and roadside verges.	Widespread in the south of England and Wales, but more scattered and rarer in the north.
Rufous-footed furrow bee	Visits a variety of flowers, including hawkweeds, lesser celandine, wood anemone, bramble, and buttercups.	Uncommon.
Buff-tailed bumble bee	Gardens, farmland, grasslands, and urban areas.	Common and widespread
Early bumble bee	Gardens, woodlands, hedgerows, and meadows.	Common and widespread
Large red tailed bumble bee	Open landscapes like gardens, grasslands, and meadows.	Common and widespread
Dull-vented sharp-tail bee	woodland edges and scrub.	Widespread but local.

9.10 Appendix Ten: Table summarizing the preferred habitats and conservation status of the invertebrates reported in the data search.

Table Seven: Table summarizing the conservation status of the trees and shrubs reported in the data search. Conservation Status is based on the IUCN Red List.

Common Name	Conservation Status	Notes
Ash (Fraxinus excelsior)	Near Threatened (UK)	Severely affected by ash dieback (Hymenoscyphus fraxineus).
Aspen (Populus tremula)	Least Concern	Important for biodiversity; supports many insect species.
Beech (Fagus sylvatica)	Least Concern	Iconic broadleaf tree; sensitive to climate change.
Birch (Betula spp.)	Least Concern	Includes silver birch & downy birch; pioneer species.
Black Poplar (Populus nigra)	Endangered (UK)	One of Britain's rarest native trees, suffering habitat loss.
Cherry (Prunus avium)	Least Concern	Attractive spring blossom; supports pollinators.
Elder (Sambucus nigra)	Least Concern	Produces edible berries; used in herbal medicine.
Elm (Ulmus spp.)	Critically Endangered (UK)	Dutch elm disease devastated populations.
Field Maple (Acer campestre)	Least Concern	UK's only native maple; thrives in hedgerows.
Goat Willow (Salix caprea)	Least Concern	Supports early pollinators with spring catkins.
Hawthorn (Crataegus monogyna)	Least Concern	Important for wildlife; known as 'May tree'.
Hazel (Corylus avellana)	Least Concern	Produces edible nuts; traditional coppicing species.
Hornbeam (Carpinus betulus)	Least Concern	Dense hardwood; often used for hedging.
Holly (Ilex aquifolium)	Least Concern	Evergreen with red berries; important winter food for birds.
Hybrid Black Poplar (Populus x canadensis)	N/A	Fast-growing, commonly planted, but lacks biodiversity value.
Hybrid Poplar (Populus spp.)	N/A	Bred for timber & biofuel; various hybrids exist.
Lawson's Cypress (Chamaecyparis lawsoniana)	N/A	Introduced species; widely used in ornamental planting.
Lime (Tilia spp.)	Least Concern	Native small-leaved & large-leaved limes are pollinator-friendly.
London Plane (Platanus x hispanica)	Least Concern	Hybrid species; highly pollution-tolerant, common in cities.
Norway Maple (Acer platanoides)	Least Concern	Non-native; aggressive spreader in some areas.
Pedunculate Oak (Quercus robur)	Least Concern	Iconic British tree; supports over 2,300 species.
Silver Birch (Betula pendula)	Least Concern	Pioneer species; thrives in poor soils.
Swedish Whitebeam (Sorbus intermedia)	Least Concern	Non-native; planted in urban settings.
Silver Maple (Acer saccharinum)	Least Concern	North American species; fast-growing but weak-wooded.
Sycamore (Acer pseudoplatanus)	Least Concern	Non-native; invasive tendencies but good for pollinators.
White Willow (Salix alba)	Least Concern	Used for cricket bats; fast-growing near water.

9.11 Appendix Eleven: Map showing the location of non-designated protected areas within 1.5 km of Ryebank Fields



9.12 Appendix Twelve: Phase One Habitat Survey Map

9.13 Appendix Thirteen: Phase One Habitat Survey - Target Notes

Table Seven: Details of target notes (TNs)	
[redacted]	
2	Native black poplar - Potential bat roost in tree
3	Important species rich hedge
4	Semi-natural broadleaved woodland
5	Aspen grove
6	Semi-improved neutral grassland
7	Semi-improved neutral grassland
8	Species poor intact laurel hedge
9	Dry ditch known as Nico ditch
10	Earth bank
11	Bare ground – hard standing where car ark used to be

[redacted]

9.14 Appendix Fourteen: Table showing results of visual inspection of trees at from the ground looking for potential roosts

Table Eight: Table showing results of visual inspection of trees at from the ground looking for potential roosts

TN	Species	Description	Potential for roosting bats	Recommendations
2	Black Poplar	Mature tree to tall to inspect fully inspect from the ground.	Unknown	Inspect from ladders/rope and harness
12	Black Poplar	Mature tree too tall to inspect fully inspect from the ground.	Unknown	Inspect from ladders/rope and harness
13	Black Poplar	Mature tree too tall to inspect fully inspect from the ground.	Unknown	Inspect from ladders/rope and harness
14	Black Poplar	Mature tree too tall to inspect fully inspect from the ground.	Unknown	Inspect from ladders/rope and harness
15	Black Poplar	Mature tree too tall to inspect fully inspect from the ground. Cavity high in canopy.	High	Inspect from ladders/rope and harness
16	Black Poplar	Mature tree too tall to inspect fully inspect from the ground.	Unknown	Inspect from ladders/rope and harness
17	Black Poplar	Mature tree too tall to inspect fully inspect from the ground.	Unknown	Inspect from ladders/rope and harness
18	Black Poplar	Mature tree too tall to inspect fully inspect from the ground.	Unknown	Inspect from ladders/rope and harness
19	Black Poplar	Mature tree too tall to inspect fully inspect from the ground.	Unknown	Inspect from ladders/rope and harness
20	Black Poplar	Mature tree too tall to inspect fully inspect from the ground.	Unknown	Inspect from ladders/rope and harness
21	Black Poplar	Mature tree too tall to inspect fully inspect from the ground.	Unknown	Inspect from ladders/rope and harness
23	Black Poplar	Mature tree too tall to inspect fully inspect from the ground.	Unknown	Inspect from ladders/rope and harness
23	Norway maple	Cavities on trunk at 7m	High	Inspect from ladders/rope and harness
24	London plane	Cavity on branch at 12m	High	Inspect from ladders/rope and harness