The Wildlife Trust for
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Manchester &
North Merseyside

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Planning
Growth and Development
Manchester City Council
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2nd April 2025

FAO Robert Griffin

Dear Mr Griffin

RE: PLANNING APPLICATION 142223/FO/2025|ERECTION OF A RESIDENTIAL DEVELOPMENT COMPRISING 120 DWELLINGS, LONGFORD ROAD/RYEBANK ROAD, MANCHESTER

I have had the opportunity to view the above planning proposal on behalf of the Lancashire Wildlife Trust and would like to make know the following observations, concerns and current opposition to the proposed development.

I note that a number of botanical surveys have been undertaken on the site, although two of the surveys were undertaken outside of the optimal time of year for such surveys. The latest surveys dated the 3rd and 18th July 2024 were however conducted within the recognised good practice survey period and all UKHabs and BNG assessments should be based on these surveys, as surveying plants at a sub-optimal time of year would lead to species being missed and an under-estimation of the habitat quality.

With regard to the botanical surveys themselves, I note that the methodology highlighted with the survey report indicates that a systematic random sampling methodology was employed, with the 15 1m quadrats being randomly distributed between the sites habitats. I would question this methodology, as it would appear that the many of the quadrats used to assess the condition of the grasslands, identified as quadrats 1 to 10 within appendix 10, are located within non-grassland habitats. Appendix 7 identifies the location of the 15 quadrats and indicates that for the 10 listed grassland quadrats, quadrats 1, 5 and 6 are located with areas identified as Bramble scrub. Quadrat 2 is situated on the edge of a grassland parcel, but is next to a track and is therefore likely to be heavily influenced by disturbance. Quadrat 8 is located within an area of woodland and quadrats 10 and 11, whilst within grassland areas are situated within narrow grassland strips, sandwiched between two blocks of woodland and are unlikely to be representative. Only quadrats 3, 4, 7, 9 and 15 appear to be appropriately sited. I feel that some clarification is required as to the precise location of the grassland quadrats and an assurance that these are representative of the grasslands present. In terms of methodology, Natural England often advise an 'M' pattern so that a full representation of the habitat is assessed. As it stands, I believe that the random nature of the quadrats methodology could seriously undermine the accuracy of the grassland condition assessments. It would also be helpful to provide the list of species identified within each quadrat, rather than just the number of species recorded.

I feel that there is a contradiction within the botany survey report and the BNG assessment report. Section 4.2, paragraph 4.2.1.1 of the botany survey report states that *'the site's habitats were species-rich, structurally diverse, and in good condition'.* This is then contradicted within paragraph 3.5.3.16 of the BNG assessment, which states that the grasslands were not considered species rich and that no BAP indicator species had been recorded. Whilst I accept that being currently unmanaged, tall grasses might dominate grassland habitats, reducing species diversity, the species lists within the reports identify two species; Meadow Vetchling and Early Marsh Orchid that are indicative of lowland meadow. Whilst certainly not suggesting it is of that quality, I also understand that a separate survey, commissioned by the friends of Ryebank Fields, also identified three other species indicative of lowland meadow; Bee Orchid, Northern Marsh Orchid and Goat's-bead. An unidentified sedge species recorded within the developers PEA survey might also be a species indicative of meadows. The presence of these plants suggest that species interest within the grassland is persistent and that with appropriate management good quality species rich grasslands would be achievable.

I also have some queries regarding the BNG metric and the classification of some of the woodland habitat. Only the western woodland has been classified as lowland mixed deciduous woodland (w1f), with all the other blocks being classified as 'other woodland, broadleaved' (w1g), including the Aspen grove. It is my understanding that the 'other woodland broadleaved' category is used primarily for stands of non-native trees. Aspen is recognised within the UKHabs as a native species and so this area of woodland should be classified as w1f; lowland mixed deciduous woodland. Given that in most of the condition assessments of the woodlands, the majority of trees and shrub tend to be native with at least a 50-80% native cover, I would also query the categorisation of these woodlands' as other woodland broadleaved. It is interesting to note that within the ecological assessment of the site commissioned by the friends of group, the ecologist identified the woodlands as semi-natural broadleaved woodland, which translates into UKHabs as w1f; lowland mixed deciduous woodland. I would therefore recommend that the Greater Manchester Ecology Units (GMEU) view be sought on this matter.

It is worth noting that survey commissioned by the Friends of Ryebank Fields also recorded the presence of the rare native Black Polar tree and that a survey undertaken by the GMEU identified the presence on site of an important hedgerow (Grid ref. SJ80949446 –SJ81089473). Whilst this would appear to be on the western, edge of the site, within an area proposed for retention within the development, its presence needs to be recognised within the BNG metric. Currently no hedgerow habitat has been identified within the baseline calculation, although, I would accept that as the hedgerow is being retained, there might well be no net difference in the post development BNG calculation.

The BNG metric itself shows that the proposed development would result in a huge loss of biodiversity within the local area, with a loss of 21.09 (-38.59%) area based biodiversity units (BU). There will also be a loss of 0.23 (-81%) in watercourse BU. The metric also shows that the trading rules for a variety of habitats such as woodland and grassland are not met. The BNG report concludes that as BNG has been maximised on site, then off-site delivery will be required to provide the mandatory 10% BNG uplift. I would however query if all efforts have been undertaken/identified to increase BNG delivery on-site. The metric indicates that whilst some habitats are to be retained, the only proposed enhancement is to the areas of Bramble scrub. There is no proposed enhancement to any of the retained woodland habitats nor to the retained grasslands. There will be some limited creation of modified grassland habitat, which is referred to as wildflower meadow and a rain garden within the BNG report, but overall this would appear to be a very unambitious approach to on-site BNG delivery. Buffer zones between existing habitats and any hard standing development need to be incorporated within the design proposal, with a greater area of retained habitat that can then be enhanced to promote on-site biodiversity.

I note and query that the watercourse metric indicates that encroachment into the watercourse and riparian habitats is set at minor, however if there is to be an 81% loss of watercourse habitat this should surely be set at major encroachment.

I also note that currently, whilst off-site compensation has been recognised as being needed to deliver the mandatory 10% BNG increase, no offsetting site has so far been identified. A number of options are suggested as to how the 10% BNG might be delivered, however, no clear indication of how the uplift is to be achieved has been provided. Whilst full details can be conditioned, it is important that enough information be provided to reassure the LPA that the mandatory 10% BNG uplift is deliverable. If the information supplied is insufficient to provide this reassurance, then further detail is required. I feel that in this case, a more detailed biodiversity strategy should be provided that identifies a definite pathway for BNG delivery, rather than just a list of possible alternatives. The strategy should include how the red flags identified within the metric are to be resolved and how the development complies with all the metric rules and principles. Details of how the BNG mitigation hierarchy have influenced the layout and design of the development also needs to be described. If off-site provision is required, the applicant needs to provide evidence of liaison with a third party, including written documentation and an agreement in principle that the necessary biodiversity units are available to purchase. If the developer plans to use statutory biodiversity credits, then this too should also be stated clearly and the pathway identified. Currently, I feel that there is some uncertainty in delivering the BNG uplift and that further information as outlined above is required on order to determine the application. Again, I would recommend that GMEUs advice be sought on this matter.

The location of any off-site compensation is also an issue that needs to be considered carefully. The ecological reports reference that the site has not been included within the Greater Manchester Local Nature Recovery Strategy (GMLNRS) as an opportunity area. However, both the Cheshire and Lancashire Wildlife Trusts are calling for Ryebank Field to be included as both woodland and grassland opportunity areas. The Trust feel that the site supports an important mosaic of grassland and scrub habitats that makes a significant contribution to the local ecological network. Ryebank Fields is contiguous with Longford Park, an amenity site that itself is included within the opportunity mapping of the GMLNRS. Ryebank Field helps to form part of the ecological corridor in this locality and is potentially of greater habitat quality than the included Longford Park. The PEA report agreed with this assessment of Longford Park within the section on ecological constraints. The report states that the habitat contained within Longford Park are open playing fields and were assessed as having low ecological value. Ecological thinking should dictate that those areas of better habitat quality should be included within the GMLNRS if the Lawton principle of creating bigger, better and more joined up landscapes are to be achieved. This is especially important for grassland habitats, as within Greater Manchester their distribution is so restricted that any grassland habitat of moderate interest capable of restoration to species rich grassland should be included in order to create a functioning ecological network.

With regards to the presence of badgers, it is clear that at least one active badger sett (sett 8) would be lost to the development. The badger monitoring survey report has assessed sett 8 as being periodically used as a nesting chamber in rotation with sett 3. Paragraph 5.5.1.2 of the badger report concludes that the significant earth works in the area would directly affect the badger sett. This sett would therefore be lost, with licencing required to protect the badgers from harm. I note that 30m buffer zones will be placed around the active setts and maintained around the retained setts. I

would recommend that the advice of Natural England and the local badger group be sought to establish if this distance is sufficient to avoid disturbance to the badgers during construction.

The badger report also indicates that as well as foraging activities being impacted, the operational phase could also adversely affect badgers through increased disturbance. However, apart from the 30m buffer zone between development and the active retained setts no strategy of how to avoid adverse impacts to badgers from the increase in residential housing has been put forward. I would suggest that it is no accident that badger sett 6, which is the closest to existing residential development, is disused and long abandoned. This unfortunately may be the fate of the remaining badger setts if the development is approved without sufficient compensation/mitigation being included within the design plans. Again, the advice of the local badger group needs to be sought on this matter.

Concerning the presence of bats, I feel that given the adverse weather conditions during some of the survey period, together with the malfunction of one of the static detectors, the surveys may have underestimated bat numbers on site. The bat survey report identified that there would be large amounts of suitable foraging habitat for bats that would be lost, but concluded that the site was assessed as supporting a low level of bat activity. I am concerned that the wet weather and the failure of one of the detectors contributed to the low activity recorded. It is also worth noting the PEA report for the development concluded that the site was of moderate value to commuting bats, whilst the PEA report commissioned for the Friends of Ryebank Fields concluded that the habitat was assessed as having high potential for foraging and commuting bats. Clearly there is some dispute on the value of the site for bats, I recommend that a precautionary approach be taken, and the site assessed as high value for commuting bats. I would also recommend that advice from the local bat group be sought on this matter.

Concerning the sites bird interest, it is clear that the mosaic of grassland and scrub provides nesting and feeding opportunities for a range of bird species, many of which are Section 41 priority species. This includes the Willow Tit, a rare endemic bird that is now listed on the draft GMLNRS as a bird requiring particular conservation effort. It is the diversity of habitat types and mosaics of grass and scrub that make this site valuable to wildlife, providing complimentary edge habitat to the areas of woodland surrounding the site. These habitat interfaces provide specialised niches for both birds and insects and the loss of which will certainly result in a loss of wildlife within the local area.

It is also clear that the site is of huge amenity and community value. The site provides an important area of good quality open greenspace, rich in wildlife within the urban environment. The GMLNRS has identified that the management for wildlife and people of our urban greenspaces is one of the main priorities of the strategy. The LNRS states that '*Our urban green spaces already provide vital refuges for wildlife and spaces for people to relax. These spaces have significant potential to become more nature-rich and at the same time better adapted to climate change'.* Priority action identified for our urban green spaces include;

- Better parks and open spaces, enhanced and managed to be nature-rich and climate-adapted, with a range of habitats for wildlife **supported by local communities**.
- Town and city regeneration and development driving new and **enhanced nature-rich green space creation**, building more biodiverse, accessible and climate-adapted places.
- More **community-led** creation of new nature-rich green spaces

GMLNRS also identifies that there are huge opportunities to make the urban areas where we live and work greener and more wildlife friendly. The strategy acknowledges that creating space for

nature has knock-on benefits in our everyday lives, improving our health and wellbeing, as well as helping to adapt the city-region to climate change. Clearly, Ryebank Fields is a site where the community interest and involvement is already manifest, with an established Friends of Group and a rich wildlife interest. The site should therefore be viewed as a priority area for the delivery of the GMLNRS actions.

In conclusion, I feel that as it stands, the proposed development would lead to a loss of biodiversity within the local area, currently without any identified pathway as to how this loss can be compensated. The site currently supports significant wildlife interest including protected and priority species and habitats. Whist acknowledging that inclusion within the GMLNRS opportunity mapping, which the Wildlife Trust is currently advocating, does not preclude development; I feel that given the current biodiversity and community interest that this is a prime site for the delivery of the actions identified within the GMLNRS. Ryebank Fields would be best viewed as a habitat bank that can receive BNG credits from development elsewhere within the city rather than having to seek off-site BNG due to large losses in on-site biodiversity. As I have stated above, ecological thinking should dictate that those areas of better habitat quality should be included within the GMLNRS if the Lawton principle of creating bigger, better and more joined up landscapes are to be achieved. This is especially important for grassland habitats, as within Greater Manchester their distribution is so restricted that any grassland habitat of moderate interest capable of restoration to species rich grassland should be included in order to create a functioning ecological network. The current proposal would lead to a loss of biodiversity within an area that provides an important contribution to the local ecological network. The site supports vulnerable protected species and biodiversity assets that would be adversely impacted by the development. I therefore feel that the application as it stands should be refused.

I hope that my comments prove useful to you in reaching your decision. If you have any queries or require clarification, please do not hesitate to contact me

Yours Sincerely

M C Walker (signed electronically)

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