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FROM: FRIENDS OF RYEBANK FIELDS
9th July 2026

RE PLANNING APPLICATION RENOTIFICATION – RYEBANK ROAD 142223/FO/2025

Dear Rob,

Thank you for the opportunity to respond to this renotification.

This supplementary objection should be read alongside our previous objection, submitted by Urban Imprint 31st May 2025, and the technical submissions made by Irwin Mitchell LLP 2nd July 2026. This submission focuses on the additional information that has emerged following the revised application documents and subsequent consultation responses. We have drawn on advice from various experts including our planning consultants, the words are our own based on their advice.

We also endorse the objections sent by Friends of Longford Park and Rye Bank Road Resident's Association.

This supplementary objection is formed of four main parts:

1. **Objection in principle** (non compliance with NPPF and Development Framework)
2. **The Application is Premature** (not ready to be considered) with inappropriate level of deferral to post planning conditions
3. **Achievability/ Viability concerns**
4. Details of the documents submitted since our previous objection

1. Objection in Principle

In summary, we object because this site is not required to enable Manchester to meet the housing targets set by PfE. There are sufficient brownfield sites - both locally and across Manchester - to meet the need for housing land. This is set alongside a deficit of open nature and play space, both locally and across Manchester. The planning balance weighs clearly against development.

1.1 Loss Of Limited Greenfield In A City With Sufficient Brownfield

The site is designated Greenfield. Having been remediated for use as playing fields and subsequently returned to natural landscape, it is classified in the Core Strategy's evidence

base (Green infrastructure Study 2015) as, 'Natural and Semi Natural Open Space'. In addition, consideration of planning balance should account for current context and information.

Paragraph 124 of the NPPF sets out how strategic planning can ensure land is used effectively. It advocates: *"meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions... accommodate objectively assessed needs in a way that makes as much use previously developed or 'brownfield' sites as possible"*

As the **2026 Open Space Assessment** itself states (Para 6.23, our emphasis) "quantity standards lean towards **protecting the existing amount of open space** through setting standards which align with existing provision, rather than standards which require **the provision of more open space, which may be less achievable** due to land constraints and funding required to implement new open space."

It's well established and uncontested by the LPA that there is a surfeit of brownfield development land identified within the SHLAA.

Locally, 240 dwellings were recently permissioned at Chorlton District Centre. At the planning meeting for that application, the developer's agent cited the need to protect green space as a key part of justification for the massing and density of that development. There are further dwellings under construction on brownfield sites on Albany Road (40), the former Chorlton Leisure Centre site (50), and Chorlton Irish Club (58). In the planning pipeline within walking distance are approximately 90 homes through the redevelopment of Rileys Snooker Hall (25), Manchester Islamic High School for Girls site (22) and Chorlton Picture House (37).

It is also relevant to consider the developments coming forward within walking distance in Trafford. Although not the responsibility or control of Manchester, they will have a significant impact on the demand for open green space as well as providing opportunities for 'right sizing' into apartments for older residents of both Chorlton and Stretford.

Over 1,000 units are identified in the Civic Quarter pipeline (including 100 on the nearby Former B&Q site) 80 apartments under construction near Old Trafford Tram stop, and additional SHLAA sites including Stretford Memorial Hospital on Seymour Grove (40), Brixham Road (150) and over 500 apartments on two neighbouring sites on Elsinore Road. Out to consultation at the time of writing, the Wharfside Masterplan aims to deliver 15,000 units at Salford Quays.

1.2 Nature Recovery and Biodiversity

NPPF Paragraph 103 clearly sets out that access to a network of high-quality open spaces and sport is important to the health and wellbeing of local communities and will help to address climate change, and as mentioned above **NPPF Paragraph 104** that open space should be protected unless it is found to be surplus to requirements.

Paragraph 104 of the NPPF states: *"Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless: (a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or (b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable*

location; or (c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”

The wildlife, biodiversity, and nature recovery value of Ryebank Fields is recognised by a range of consultees including the Lancashire Wildlife Trust (LWT), GM Ecology Unit, and Friends of Longford Park - a neighbouring Nature Recovery opportunity area.

Ryebank Fields were also identified by LWT and GMEU as suitable for inclusion in the Nature Recovery Network and as a potential site for Biodiversity Net Gain credits. The whole site is an important connector habitat enabling wildlife to extend both north and west into the increasingly densely built out areas of Gorse Hill and Old Trafford, and east into Chorlton and Whalley range, and the wildlife corridor opportunities provided by infrastructure such as tram sidings, UU easements, and the Fallowfield Loop.

Summary of Objection in Principle

For these reasons, we submit that the proposed development is unacceptable in principle. Ryebank Fields is an established greenfield site of significant ecological, recreational and community value, situated within an area where open natural space is already in deficit. The applicant has not demonstrated that the site is required to meet housing need, nor that the substantial loss of green infrastructure can be justified when sufficient brownfield land exists to accommodate housing growth. The proposal is therefore contrary to the objectives of the National Planning Policy Framework and the wider planning balance weighs against development.

Even if the Council were not to agree with this objection in principle, we submit that the application should not be determined in its current form for the reasons set out below.

2. The Application is Premature

We object to this application on the grounds that it is fundamentally premature. The applicant has submitted an environmental evidence base which remains incomplete and which, in our view, contains significant omissions and unresolved inconsistencies. In our view, determining the application before these matters are resolved would expose the decision to unnecessary legal risk.

2.1. Statutory consultees:

None of the principal statutory consultees with responsibility for environmental protection or infrastructure has provided unequivocal support for the application.

- **United Utilities** identify assets that cross this site where easements and mapping still need to occur. We have recently shared new evidence with you regarding the culverted route of the Longford Brook across the top meadow, a pivotal factor impacting on drainage strategy, remediation, housing layout, and other factors. Such unpredictable findings are typical of the Ryebank Fields site, and have the potential to significantly alter both the design and viability of the scheme.
- The conditions suggested by the **Environment Agency** are onerous yet non-specific and highlight significant viability and deliverability risks. If detailed studies are conditioned for only once planning permission has been granted, at that point it

becomes much more challenging to retrofit plans or to abandon the scheme, leading to a risk of unacceptable levels of compromise, 'value engineering' and an overall reduction in quality.

- The **Lead Local Flood Authority** has not confirmed that the submitted drainage strategy is satisfactory. Instead, it has repeatedly requested further investigation of the site's drainage infrastructure, including CCTV investigation of the drainage network, and has recently indicated that it will recommend a comprehensive site investigation following the submission of additional evidence relating to the historic Longford Brook culvert. This demonstrates that key aspects of the site's hydrology and drainage remain unresolved and require further investigation before the application can properly be determined.
- The working assumptions relied on about the status of and opportunities for **badger habitat** in the locality are incorrect and outdated. Evidence of this will be sent under separate cover. A planning application cannot be approved unless the LPA is confident that Natural England will issue a Mitigation License ([Natural England Guidance](#))
- Cadent have once more added a holding objection until they have completed their own assessment regarding their assets.
- A number of consultees have not yet submitted or made available their responses (e.g. GMAAS re the Nico Ditch, Trafford Highways, Conservation Officer for Trafford Council, and Trafford Council).

2.2 Longford Brook and previously unidentified culverted watercourse

Since the submission of our previous objection, substantial new evidence has come to light regarding the historic course of the Longford Brook across the application site. This evidence includes historic Ordnance Survey mapping, Manchester City Council committee records approving the culverting of the brook in 1969–70, engineering drawings showing both existing and proposed culverts, and physical inspection of accessible structures connected to the wider drainage network.

Collectively, this evidence raises serious questions about the applicant's conclusion that no culverted watercourse crosses the site. At the very least, it demonstrates that the position is not sufficiently understood to support the assumptions underpinning the drainage strategy, remediation strategy and engineering design.

The implications extend far beyond drainage alone. A previously unidentified culvert or associated drainage infrastructure could materially affect:

- the drainage strategy and flood risk assessment;
- ground investigation and contamination remediation works;
- foundation and piling design;
- housing layout and road alignment;
- ecological mitigation;
- long-term maintenance responsibilities; and
- the overall viability and deliverability of the development.

These are not minor technical matters capable of being addressed through detailed design after planning permission has been granted. They go to the heart of whether the proposed development has been designed on an accurate understanding of the site.

It is particularly notable that, following submission of this evidence, the Lead Local Flood Authority has indicated that it will recommend a comprehensive site investigation. This reinforces our submission that the current environmental evidence base is incomplete and that further investigation is required before the application can properly be determined.

The existence, alignment and condition of any historic culverted watercourse should therefore be established before any planning decision is made. If further investigation confirms that the current technical assumptions are incorrect, the implications could require significant amendments to the drainage strategy, engineering design, remediation proposals and site layout. Determining the application before these matters are resolved would therefore be premature.

2.3 Proposed Planning Conditions would fail to meet Statutory Tests

We object to the suggestion that the significant unknowns of this former landfill site can be managed through planning conditions. The draft conditions outlined by the Environment Agency (EA) are legally flawed, procedurally unworkable, and fail the strict statutory tests required by national planning policy.

If considered at the current state of play, we consider there would be an inappropriate level of deferral of investigations and strategies being left to post-permission conditions.

NPPF Para 57 requires planning conditions to be *“enforceable, precise and reasonable in all..respects”*

- **Precision:** The conditions regarding the extent of contamination and remediation in the made ground are vague, generalized, and unspecific. They rely on ‘future scoping’ rather than defined parameters, meaning neither the developer nor the community can be certain of what is required.
- **Enforceability:** A condition that cannot be clearly monitored or enforced is legally invalid. Because the sub-surface contamination profile is incomplete, the LPA cannot establish a clear, enforceable baseline to judge compliance.
- **Reasonableness:** Passing the operational risk and monitoring duties of a highly hazardous engineering process onto the council’s planning department directly violates the NPPF test of reasonableness. The council’s planning enforcement team lacks the specialized expertise, equipment, and statutory resources required to oversee active borehole, piling, and related investigative and construction operations.

If these conditions are attached to a decision notice, they could create an immediate legal vulnerability. Because they are imprecise and structurally unenforceable by the LPA, the planning permission itself could be susceptible to a formal legal challenge.

2.4 Summary of major outstanding factors, unresolved issues, and inaccuracies

- **Longford brook and impacts on design, environmental and drainage impacts**

- **Inadequate Drainage Strategy**
- **EA conditions require further drainage and geotechnical surveys**
- **Treatment of Nico Ditch not compliant with Development Framework or considerate of its heritage status– further investigations recommended by GMAAS**
- **Approach to mitigation for or prevention of disturbance of a protected species. A planning application cannot be approved unless the LPA is confident that Natural England will issue a Mitigation License**
- **Highways access application not yet determined**
- **Long-Term Estate Management to deliver SUDS, BNG and community benefit:**
Uncertainties remain around the detail of the following aspects, which should be considered material as they impact on the satisfactory delivery of BNG, affordability and other aspects which would otherwise be given ‘community benefit’ weight:
 - Future maintenance responsibilities.
 - Service charges for residents.
 - Management of drainage infrastructure, woodland, landscaping and ecological features

In summary, the application attempts to bypass essential pre-determination requirements by pushing critical environmental risks onto post-permission conditions, which the LPA would carry the burden of monitoring and enforcing.

Taken together, these unresolved matters demonstrate that the application before the Council is not a fixed scheme capable of proper assessment, but one whose technical design, environmental mitigation and engineering requirements remain subject to potentially significant change.

3 Achievability / Viability

We also object to this application on the grounds that the applicant has not demonstrated that the scheme can be delivered as proposed in light of the significant unresolved technical constraints that remain across the site. The public benefits relied upon in support of the application, including the provision of affordable housing and Passivhaus construction, should only be afforded significant weight in the planning balance where there is a realistic prospect of their delivery. The evidence base now appears to contain significant omissions and inaccuracies relating to underground infrastructure and site conditions, undermining confidence in the assumptions on which the engineering design, remediation strategy and overall scheme viability have been based.

The applicant has referred to potential Homes England funding. The delivery of the scheme, including the remediation works and the provision of both affordable and private housing, appears likely to depend upon significant public funding. Whilst funding arrangements are not ordinarily a material planning consideration, they become relevant where there are substantial doubts about the deliverability of the development itself. Given the unresolved environmental constraints, the outstanding technical investigations, and the extent of further work now being sought by statutory consultees, the Council cannot be satisfied that the development presented in this application is capable of being delivered in the form proposed.

Rather than reducing uncertainty, each successive stage of investigation has identified further constraints affecting the site. The cumulative effect is that the achievability of the proposed development has become progressively less certain as more information has emerged. Significant issues relating to contamination, biodiversity, drainage, underground infrastructure, heritage, archaeology, trees, highways access and long-term site management remain either unresolved or subject to further investigation.

Potential Consequences of Unresolved Viability

If the costs associated with remediation, drainage, underground infrastructure and other technical constraints prove greater than currently anticipated, there is a significant risk that:

- the applicant may seek to vary Section 106 obligations or submit a Section 73 application to reduce planning obligations, including affordable housing, Passivhaus standards, ecological mitigation, Sustainable Drainage Systems (SuDS) and long-term biodiversity management;
- additional public funding may be required to enable the scheme to proceed in its current form;
- further redesign may be required as additional technical information becomes available; or
- elements of the scheme may ultimately prove undeliverable.

The Council is therefore being asked to determine an application whose environmental constraints remain incompletely understood, whose engineering requirements continue to evolve, and whose financial implications cannot yet be reliably assessed. Until these uncertainties have been resolved, the public benefits relied upon by the applicant should be afforded limited weight in the planning balance because their delivery has not yet been demonstrated.

4. Outstanding Matters requiring resolution prior to Determination

In addition to the principal objections set out above, a number of further material planning issues remain unresolved. Individually, each raises legitimate concerns regarding the adequacy of the submitted evidence. Collectively, they reinforce our submission that the application is premature and that the Council cannot yet be satisfied that the development has been properly designed, assessed or demonstrated to be deliverable.

Traffic and Highways

The proposed northern access remains the subject of a separate planning application before Trafford Council. Until that application has been determined, the final access arrangements for the development remain uncertain. Should permission for the northern access be refused, significant amendments to the site layout, servicing arrangements and estate management proposals may be required.

Regardless of the outcome, concerns remain regarding highway safety and residential amenity. In particular:

- there remains no satisfactory solution to the long-standing traffic congestion associated with school pick-up and drop-off times, sporting fixtures and other peak periods;
- responsibility for the future funding, maintenance and management of the proposed unadopted highways, including carriageways, footways, SuDS features and rain gardens, remains unclear;
- there is likely to be continuing pressure to create a through-route between the Trafford and Manchester sides of the development to accommodate service vehicles, deliveries and emergency access, creating ongoing uncertainty regarding the long-term operation of the estate.

These matters have direct implications for the design and operation of the development and should be resolved before the application is determined.

Long-term Estate Management

Many of the public benefits relied upon by the applicant—including biodiversity enhancement, Sustainable Drainage Systems (SuDS), publicly accessible open space and long-term landscape management—depend upon effective future management arrangements.

However, important aspects of those arrangements remain insufficiently defined. The supporting documents rely upon management responsibilities that have yet to be clearly established, whilst key management plans remain incomplete or in draft form. Uncertainty also remains regarding future maintenance responsibilities, service charges and the long-term management of ecological mitigation and community assets.

These arrangements are fundamental to the successful delivery of the development and should be clearly established before planning permission is granted.

Ryebank Community Garden

Rye Bank Road Residents' Association has set out detailed objections regarding the proposed loss of the Ryebank Community Garden, which we support.

The proposal to relocate the garden fails to recognise that its value derives not simply from the physical land it occupies but from its established location, history and long-term community stewardship. This significance is reflected in its designation as an Asset of Community Value.

The application has not demonstrated that the proposed replacement would provide an equivalent community benefit, nor that the loss of this established community asset has been satisfactorily mitigated.

Contamination and ACM Management

As set out within the separate technical objection submitted by Irwin Mitchell LLP on 2 July 2026, significant uncertainties remain regarding contamination and remediation across the site.

We are also concerned that the proposed remediation strategy for asbestos-containing materials (ACMs) within the woodland has not been adequately justified.

The methodology appears to rely principally upon modelling rather than incorporating the existing programme of quarterly monitoring data collected over a number of years. This raises questions as to whether the current level of risk has been accurately characterised and whether the proposed remediation represents a proportionate response.

Furthermore, the proposed 'clear cover' remediation system (topsoil with or without a membrane) gives rise to a number of practical concerns:

- altering soil levels within Root Protection Areas appears difficult to reconcile with BS5837:2012 guidance;
- the proposed covering would not address the underlying source of the problem, namely asbestos-containing materials being excavated from deeper made ground by burrowing mammals;
- burrowing mammals are likely to penetrate any membrane or cover system, reducing the long-term effectiveness of the proposed mitigation.

Until this methodology has been fully justified, the Council cannot be satisfied that an appropriate and proportionate remediation strategy has been demonstrated.

Flood Risk

The application does not appear to fully assess the potential impact of surface water runoff on neighbouring residential properties, many of which are situated at lower elevations than the application site. Local residents have consistently raised concerns regarding existing drainage problems and localised flooding.

These concerns are heightened by the continuing uncertainty regarding the site's drainage infrastructure, the evidence relating to the historic Longford Brook culvert, and the further investigations now being sought by statutory consultees.

Until these matters have been resolved, we do not consider that the flood risk implications of the development have been adequately assessed, and the Council cannot be satisfied that flood risk has been properly understood.

Trees and Landscape Management

The landscape proposals include approximately 97 non-native trees. No clear ecological justification has been provided for this approach on a site promoted for its biodiversity value and contribution to nature recovery.

In addition, the Landscape Management Plan identifies extensive areas of existing woodland and scrub as presenting opportunities for "improvement" and intervention, yet provides very little detail regarding the nature of those interventions or the ecological evidence supporting them. Many of these areas currently provide valuable wildlife habitat and contribute significantly to the established character of the site.

Until the proposed management approach has been properly justified, the Council cannot conclude that the landscape and ecological benefits relied upon by the applicant will be achieved.

Concluding Remarks

This supplementary objection advances two independent grounds on which planning permission should be refused.

First, we maintain our objection in principle. Ryebank Fields is an established greenfield site of significant ecological, recreational and community value. In circumstances where Manchester has sufficient brownfield land to meet its housing requirements, the unnecessary loss of this site cannot be justified. The planning balance weighs decisively against development.

Secondly, and independently of that objection, we submit that the application is premature. Since our previous objection was submitted, further information has consistently revealed additional constraints rather than reducing uncertainty. New evidence relating to the Longford Brook, continuing concerns raised by statutory consultees, unresolved drainage and contamination issues, uncertainty surrounding highways access, and outstanding questions regarding long-term management and deliverability all demonstrate that the site is not yet sufficiently understood for planning permission to be granted.

The Council is therefore being asked to determine an application based upon an evidence base that remains incomplete. Fundamental aspects of the site's drainage, environmental constraints, underground infrastructure and engineering requirements continue to evolve. As a consequence, neither the technical feasibility nor the financial deliverability of the scheme has been satisfactorily demonstrated.

These are not matters that can appropriately be deferred through planning conditions. Many go to the heart of the acceptability, design and deliverability of the development itself. We do not consider that conditions requiring extensive further investigation after permission has been granted would satisfy the tests set out in paragraph 57 of the National Planning Policy Framework, namely that planning conditions should be necessary, relevant, enforceable, precise and reasonable in all other respects.

For these reasons, we respectfully request that Manchester City Council refuses planning permission. If the Council is not minded to refuse the application in principle, it should nevertheless decline to determine the application until the outstanding technical investigations have been completed, the environmental evidence base is demonstrably complete, and the applicant has shown that the development can be delivered safely, lawfully and in the form presented.

With kind regards,

Sarah Benjamins (Chair) on behalf of the Friends of Ryebank Fields