

Dear Sir/Madam,

Re: 143413/FO/2025- Change of use of former university playing fields to community woodland and meadow.

We are writing from the Environmental Law Foundation, a legal charity that assists communities with environmental problems. In our work, we see how vital the maintenance of open green space in urban areas is, and the irreversible harm caused when adequate steps are not taken to protect these scarce sites from development.

Therefore, we wish to register our strong support for the above planning application submitted by the Ryebank Fields Community Group, which seeks full permission for the change of use of the Ryebank Fields site to a Community Woodland and Meadow- an application that seeks to maintain and enhance the green space, formalising its current use.

We have been in contact with Ryebank Fields Community Group for over a year now and are aware of the history of the site and how a once abandoned field has rewilded over the years, becoming part of the local ecological network. In this time, it has also become both a valuable community resource for south Manchester, both for day-to-day activities and events.

We understand there have been several applications in the past which have sought to develop this land for residential uses, with there currently being an undetermined application from February 2025 for 120 dwellings. There is a precedent of this site being rejected on environmental reasons, with the loss of open space being a key factor. This reasoning has only become more pertinent in 2025, as local authorities are working to tackle the climate and nature emergencies. The importance of nature and open space is seen consistently in local and national policy. Allowing this application, and lawfully establishing the current use, will align both with policy and with the Council's recognition of the importance of the site, ensuring residential development takes place on more appropriate sites.

We urge the Council to place great weight on the below points when considering this application for approval.

1. Environmental and Biodiversity Benefits

ELF notes that Ryebank Fields is an exceptionally species-rich environment, which acts as a vital habitat for local wildlife and acts as a natural carbon sink in an area of the city that is being increasingly developed with limited green spaces.

The site contains ten distinct habitats and at least 281 species, including legally protected species such as bats, breeding birds, hedgehogs, and other protected wildlife. There are over 1,400 trees in the site, many of which are identified as having high potential for roosting bats. The site is also home to a rare native black poplar tree and an ecologically significant hedgerow.

Urban encroachment onto the Fields would therefore be a disaster for local wildlife. The Preliminary Ecological Appraisal refers to the outstanding housing application, stating it would cause "irreversible loss of locally important habitats that currently support a diverse range of fauna and flora. ". By contrast, approving this application would not only ensure protection for this site but would enhance through light touch conservation methods.

We are currently in a nature crisis, with nature and biodiversity being recognised nationally and globally as declining at an unsustainable rate. The change of use will protect natural habitats, strengthen ecological networks, act as a natural carbon sink, and aid flood prevention - all in direct accordance with policies JP-G6, JP-G7, and JP-G8 of Places for Everyone, contributing to Greater Manchester's Biodiversity Action Plan, the Local Nature Recovery Strategy and the Manchester Green and Blue Infrastructure Strategy.

2. Community Value and Public Support

The site has enormous community value due to its size, accessibility, and incredible nature. It supports a diverse range of activities such as themed guided walks, singing, painting, trails, honouring festivals, dog walking, cycling, bird watching, star gazing, photography and being in nature. It contains the Nico Ditch, a non-designated heritage asset of emerging significance, and an Asset of Community Value is found on the northern entry of the site.

It is within a 15 minute walk for 25,000 people and is within the area of South Manchester which is the only area of the city where current provision of green space is below the minimum standard, with the shortfall equating to 45.17 hectares.

The importance of the site to the local community is a clear mandate, with over 725 residents submitted positive responses during pre-consultation, with no objections received. The community expressed excitement about additional elements that could be added to the space to support the range of cultural and recreational activities such as observation booths and sculptures, again emphasising the site's importance as a recreational, cultural and community hub.

ELF supports maintaining Ryebank Fields as an open, rewilded green space in order to maintain access to nature and accord with the local and wider communities who have made it clear they wish to prevent urban development on the land.

3. Policy Support and Principle of Development

ELF considers that this proposal fully accords with both local and national planning policy objectives, as required by Section 38 (subsection 5) of the Planning and Compulsory Purchase Act (2004) as amended by the Levelling Up and Regeneration Act (2023) . It clearly supports various policies within the National Planning Policy Framework (2024) and the Places for Everyone Joint Development Plan (2022-2039) (see Policy JP-Strat9: Southern Areas, Policy JP-Strat13: Strategic Green Infrastructure, Policy JP-G1: Landscape Character, Policy JP-G2: Green Infrastructure Network, Policy JP-G6: Urban Green Space, Policy JP-G7: Trees and Woodland, Policy JP-G8: A Net Enhancement to Biodiversity and Geodiversity, Policy JP-C6: Walking and Cycling) , which strongly encourage the protection, enhancement, and creation of accessible urban green spaces. It also meets the aims of the Manchester Core Strategy (2012-2027) (see Policy EN9: Green Infrastructure, Policy EN10: Safeguarding Open Space, Sport and Recreation Facilities, Policy EN12: Area priorities for Open Space, Sport and Recreation, Policy EN15: Biodiversity and Geological Conservation) which promote biodiversity, safeguard open space, and improve recreational access.

ELF considers that this application meets the two overarching policy tests of principle of development and technical acceptability which arise from these frameworks.

With regards to the former test which considers whether proposed change of use is appropriate

for the site and location when assessed against the policies which guide and direct this land use within the borough, it is clear the change of use in this matter will only be formalising the use of the land and protecting it as an open space with community and ecological value, which the policies within frameworks are wholly supportive of.

With regards to the latter which considers whether change of use can be implemented in a manner which avoids adverse impact to wildlife, and whether the use can be implemented safely with regard to historic contamination, ELF considers the reports submitted as part of the planning package demonstrate that this application is technically acceptable.

Formalising the site's long-standing community use as open green space represents sustainable development, the goal of all planning policy, in its truest sense-promoting health, wellbeing, and social cohesion while protecting the environment.

4. Positive Planning Balance

Though it is recognised that there are local development frameworks that outline ambitions in relation to the Fields for residential development, namely the Ryebank Road Development Framework, ELF notes this framework is based on outdated policy and predates important updates, particularly the adoption of Places for Everyone.

In any case, when weighed within the planning balance, the clear and consistent policy in favour of this development, as outlined above, substantially outweighs the significance of this framework such that this framework is not a preclusion to approving this application.

Conclusion

In light of these strong and demonstrable benefits, and the absence of any significant adverse impacts, this application clearly meets the tests of sustainable development set out in national and local planning policy. ELF urges Manchester City Council to approve the application in full and allow the Ryebank Fields Community Group to continue protecting and enhancing this invaluable community asset.

Kind regards,



Environmental
Law Foundation