



MANCHESTER LOCAL PLAN (REGULATION 19)

REPRESENTATION ON THE SOUNDNESS OF THE MANCHESTER LOCAL PLAN The Exclusion of Ryebank Fields from the Proposed Local Green Space Designations



Submitted by:

Ryebank Fields Community Group Ltd

Reference: RFCG/R19/LGS/2026

Submitted to: The Planning Inspectorate

Manchester Local Plan Examination



ABBREVIATIONS

RFCG – Ryebank Fields Community Group
FoRF – Friends of Ryebank Fields
LGS – Local Green Space
NPPF – National Planning Policy Framework
MCC – Manchester City Council
SHLAA – Strategic Housing Land Availability Assessment
PfE – Places for Everyone

EXECUTIVE SUMMARY

This representation is submitted by the Ryebank Fields Community Group (RFCG) in response to the proposed exclusion of Ryebank Fields from the list of Local Green Spaces (LGS) in the Regulation 19 Manchester Local Plan.

RFCG asserts that the proposed exclusion is unsound because the Council has not adequately demonstrated that its assessment of Ryebank Fields has properly applied the relevant national and local planning policy framework, particularly the requirements of the National Planning Policy Framework (NPPF) (Appendix 4) for Local Green Space designation.

Ryebank Fields is an established and valued area of open green space bordering Chorlton, Longford Park and Firwood. It provides recreational, environmental, landscape and community benefits to a densely populated urban area. The land is regularly used by local residents for informal recreation, walking, nature appreciation and community activities and has developed a strong and demonstrable value to the surrounding community.

RFCG asserts that the land satisfies the three fundamental NPPF criteria for Local Green Space designation:

The land is in close proximity to the community it serves.

The land is demonstrably special to the local community.

The land holds particular local significance through its recreational, environmental, landscape, wildlife, tranquility and community value.

The evidence submitted with this representation demonstrates that these characteristics are not simply general attributes of urban green space. They arise from the particular circumstances, location, history, character and community use of Ryebank Fields.

RFCG is particularly concerned that the Council's assessment has not given sufficient weight to the substantial evidence of community value. Rather than allowing its potential for future development to determine whether it merits designation, the assessment should consider the land on the basis of its existing characteristics and the NPPF Local Green Space criteria.

The proposed exclusion also needs to be considered in the context of the land's planning history and the Council's previous consideration of Local Green Space proposals for Ryebank Fields. Proposals for designation were submitted in 2020 and 2024 ([Appendix 1](#)), demonstrating that the land's community importance has been recognised over a considerable period.

RFCG asserts that the Council's reliance on development-related evidence, including the Strategic Housing Land Availability Assessment (SHLAA) ([Appendix 2](#)) and previous development framework material, does not provide an adequate basis for determining whether Ryebank Fields meets the NPPF criteria for Local



Green Space. Development potential and Local Green Space designation are separate planning considerations and should not be conflated.

The representation therefore identifies concerns regarding:

- The application of the correct national policy test;
- The weight given to evidence of community value and use;
- The assessment of recreational, environmental, landscape and wildlife value
- The treatment of the land's development potential;
- The relationship between the Local Green Space assessment and the current development plan framework; and
- Whether the reasons given for excluding Ryebank Fields are sufficiently robust and evidence-based to justify the proposed designation boundary.

RFCG does not contend that every area of urban open land should be designated as Local Green Space. Rather, the case for Ryebank Fields is based on the specific and demonstrable significance of this particular land to the local community, supported by evidence set out throughout this representation and its appendices.

The proposed exclusion should therefore be reconsidered. RFCG submits that the evidence provides a sound basis for including Ryebank Fields within the Local Green Space designations in the Manchester Local Plan.

Requested modification

RFCG respectfully requests that the Inspector finds the proposed exclusion of Ryebank Fields to be unsound and requires the Council to include Ryebank Fields within the Local Green Space designations of the Manchester Local Plan, subject to confirmation of an appropriate site boundary.

If the Council maintains its position, RFCG requests that the Inspector carefully examines whether the Council has properly applied the NPPF criteria, adequately considered the evidence submitted by the local community, and provided sufficient justification for the exclusion of a site which RFCG asserts clearly meets the requirements for Local Green Space designation.



1. THE ISSUE FOR EXAMINATION

1.1 *The Issue*

This representation is submitted by Ryebank Fields Community Group (RFCG) in response to the Regulation 19 consultation on the Manchester Local Plan ([Appendix 2](#)).

It concerns the proposed exclusion of Ryebank Fields from the Local Green Space (LGS) designations in the draft Local Plan.

RFCG asserts that this omission is not justified by the evidence or by the requirements of national and local planning policy.

The case advanced in this representation is that Ryebank Fields satisfies the criteria for Local Green Space designation and that its exclusion raises issues of soundness, particularly in relation to the Plan's justification, effectiveness and consistency with national policy. The representation therefore asks that Ryebank Fields be included as a proposed Local Green Space and that the Plan be modified accordingly.

1.2 *Introduction to Ryebank Fields*

Ryebank Fields is an established area of open green space serving the surrounding communities of Chorlton, Longford Park and Firwood.

The land comprises a combination of woodland, meadow and other naturalised areas and is used by local residents for informal recreation, walking, contact with nature and community activities. It also provides important ecological, landscape and environmental functions within a densely developed urban area.

The land is a greenfield site and has longstanding community value. Its protection has been the subject of sustained local campaigning and proposals for Local Green Space designation have previously been submitted to Manchester City Council, including in 2020 and 2024 ([Appendix 1](#)).

1.3 *Local Green Space Designation*

Local Green Space is a specific planning designation intended to protect areas of particular importance to local communities.

The National Planning Policy Framework (NPPF) provides that Local Green Space designation should only be used where land is demonstrably special to a local community and meets the relevant criteria. The designation therefore requires consideration of the qualities and significance of the individual site rather than simply its development status.

RFCG's position is that Ryebank Fields meets these requirements because of its local significance, recreational value, landscape and environmental qualities, and importance to the identity and wellbeing of the surrounding communities.

The evidence supporting these characteristics is set out in the subsequent chapters of this representation.

1.4 *The Council's Decision to Exclude Ryebank Fields*

In July 2026, Manchester City Council's Executive approved the draft Local Plan, including the proposed list of Local Green Space designations. Ryebank Fields was not included.



RFCG asserts that the decision to exclude Ryebank Fields has not been adequately justified and that

the assessment process has not properly addressed the evidence demonstrating the land's suitability for designation.

In particular, RFCG is concerned that the assessment of Ryebank Fields has been influenced by its potential availability for development and by previous strategic housing assessments, rather than by a proper assessment against the specific NPPF criteria for Local Green Space.

This representation therefore focuses on whether the Plan has been prepared using an appropriate evidence base and whether the reasons for excluding Ryebank Fields are sufficiently robust to justify the omission.

2. POLICY FRAMEWORK AND THE LOCAL GREEN SPACE TEST

2.1 National Planning Policy Framework

The document, the National Planning Policy Framework (NPPF) provides the national planning policy framework against which the proposed Local Plan must be assessed.

In relation to Local Green Space, the NPPF states that local communities should be able to identify areas of particular importance to them for special protection. Local Green Space designation should only be used where land meets the relevant criteria and is capable of enduring beyond the end of the plan period.

The NPPF requires Local Green Space to be demonstrably special to a local community and to hold particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of wildlife.

RFCG asserts that Ryebank Fields meets these requirements. Its importance is demonstrated by its longstanding recreational, environmental, landscape and community value and by the sustained efforts of local residents to secure its protection.

2.2 Local Green Space and the Manchester Local Plan

The Manchester Local Plan provides the local policy framework for the protection and designation of Local Green Spaces within the city.

The preparation of the Plan must be consistent with national planning policy and supported by an appropriate and proportionate evidence base. The identification or exclusion of individual sites should therefore be based on a sound assessment of their planning characteristics and their suitability for designation.

RFCG's concern is that the assessment of Ryebank Fields has not properly reflected the criteria applicable to Local Green Space. In particular, the assessment appears to have given significant weight to the land's potential for development rather than first establishing whether it satisfies the NPPF requirements for designation.

The potential availability of land for development does not, in itself, determine whether that land is suitable for Local Green Space designation. These are separate planning considerations and should be assessed accordingly.

2.3 Places for Everyone

Places for Everyone (PfE) ([Appendix 2](#)) was adopted in March 2024 and forms an important part of the



strategic planning framework for Greater Manchester.

PfE identifies the strategic development requirements and policies within which the Manchester Local Plan must operate. It does not, however, remove the requirement for individual areas of green space to be assessed against the relevant national and local policies when considering Local Green Space designation.

RFCG therefore asserts that previous strategic assessments of the development potential of Ryebank Fields should not be treated as determinative of its suitability for Local Green Space designation.

The assessment should instead consider the land's actual characteristics and its importance to the local community against the applicable Local Green Space criteria.

2.4 Soundness of the Plan

At examination the Manchester Local Plan must be capable of being assessed as sound under the statutory framework for plan preparation.

The NPPF sets out five tests of soundness for local plans: positive, appropriate, effective, consistent with national policy and conforming to any adopted spatial development strategy. RFCG's concerns in this representation principally relate to the tests of appropriateness, effectiveness and consistency with national policy.

RFCG asserts that the exclusion of Ryebank Fields raises particular concerns regarding whether the Plan is:

- Appropriate, because the evidence and reasoning supporting the exclusion are not sufficiently robust;
- Effective, because the Plan does not adequately reflect the demonstrated importance of Ryebank Fields as an area of local green space; and
- Consistent with national policy, because the assessment has not properly applied the NPPF approach to Local Green Space.

These matters are examined in greater detail in the following sections.

The relevant question is not whether Ryebank Fields has development potential, but whether it is an area that is demonstrably special to the local community and meets the criteria for Local Green Space designation. RFCG asserts that the evidence demonstrates that it does.

The examination issue is therefore whether the Plan provides a sufficiently robust and transparent basis for excluding Ryebank Fields after applying the Local Green Space criteria to the land itself. The existence of development potential is not, in itself, an answer to that question.

3. RYEBANK FIELDS AGAINST THE LOCAL GREEN SPACE CRITERIA

3.1 Introduction

Ryebank Fields is an established area of accessible urban green space that is demonstrably special to the local community. Its importance arises from the combination of its recreational, environmental, landscape and community value. These characteristics are existing qualities that are experienced and valued by local residents. RFCG asserts that the available evidence demonstrates that Ryebank Fields meets the relevant criteria for designation as a Local Green Space.



3.2 Location and Relationship with the Local Community

Ryebank Fields is closely integrated with the surrounding communities of Chorlton, Longford Park and Firwood. Its location within an established urban area gives the land particular local significance. It provides accessible green space for residents in an area where opportunities to experience woodland, meadow and naturalised habitats are limited. The land's accessibility and relationship with neighbouring residential communities contribute directly to its recreational and community value.

3.3 Demonstrably Special to the Local Community

The importance of Ryebank Fields to the local community is demonstrated by longstanding use, community involvement and sustained efforts to secure its protection. Local residents have consistently valued the land as a place for informal recreation, walking, nature appreciation and community activity. The strength and persistence of community support for its protection provides further evidence that the land is regarded as more than simply an area of undeveloped land.

The proposals for Local Green Space designation submitted in 2020 and 2024 ([Appendix 1](#)) provide additional evidence of the community's longstanding commitment to protecting Ryebank Fields. Manchester City Council has stated that the single biggest message coming out of their Local Plan consultations in 2020, and again in 2024, was that Ryebank Fields should be designated a Local Green Space.

3.4 Community Involvement in the Planning Process

Community involvement is also demonstrated by the longstanding engagement of local residents and community organisations in planning matters concerning Ryebank Fields, including the submission of Local Green Space proposals, representations to Manchester City Council, continued engagement with the Local Plan process and the submission by RFCG of a community-led planning application seeking to retain Ryebank Fields as an area of open green space.

This sustained engagement demonstrates that the community's interest in the future of Ryebank Fields extends beyond the current Local Plan process and reflects a longstanding commitment to its retention and protection.

3.5 Environmental and Biodiversity Value

Ryebank Fields contains a mosaic of woodland, meadow and other naturalised habitats which provide ecological value within the urban environment.

The land contributes to biodiversity and provides opportunities for wildlife to move through and use an area of otherwise heavily developed land. Its vegetation and habitats also contribute to wider green infrastructure and environmental resilience.

These characteristics are relevant to the land's local importance and reinforce its value as an area of green space worthy of protection.

3.6 Contribution to Local Character

Ryebank Fields makes an important contribution to the character and distinctiveness of the surrounding area. The combination of woodland, meadow, open space and natural vegetation provides a contrast to



the predominantly built-up urban environment. The site contributes to the landscape setting of the surrounding communities and forms part of their established local identity. Its loss would therefore represent more than the loss of an undeveloped land: it would remove a valued element of the area's existing green character.

3.6 Recreational, Health and Wellbeing Value

Ryebank Fields provides opportunities for informal recreation and contact with nature that are readily accessible to local residents. Walking, informal outdoor activity and access to natural surroundings contribute to physical and mental wellbeing. These benefits are particularly important in an urban area where accessible green space provides opportunities for residents to experience nature close to home.

The recreational value of the land is therefore an important component of its local significance.

3.7 Not an Extensive Tract of Land

In the context of the NPPF Local Green Space criteria Ryebank Fields is not an extensive tract of land. Its scale and relationship with the surrounding urban area make it appropriate for consideration as a Local Green Space. The designation would protect a defined and locally significant area rather than seek to apply Local Green Space status indiscriminately to a large tract of land.

3.8 Community Evidence

Evidence submitted in support of Local Green Space designation includes the proposals made by Friends of Ryebank Fields and the continuing community campaign to protect the land. This evidence demonstrates sustained local interest in the future of Ryebank Fields and supports the conclusion that the land is demonstrably special to the community.

The community evidence should be considered alongside the land's physical, environmental and recreational characteristics rather than in isolation.

3.9 Assessment Against the Local Green Space Criteria

Taken together, the evidence demonstrates that Ryebank Fields is:

- Located within and closely connected to the surrounding local communities;
- Accessible and used for informal recreation;
- Demonstrably special to the local community;
- Of environmental and biodiversity value;
- Contributing to local landscape character and identity;
- Providing opportunities that support health and wellbeing; and
- Of an appropriate scale for Local Green Space designation.

RFCG therefore asserts that Ryebank Fields satisfies the relevant criteria for designation as a Local Green Space.

3.10 Conclusion



The evidence demonstrates that Ryebank Fields is a valued and distinctive area of urban green space with established recreational, environmental, landscape and community significance.

Its importance is supported by both the characteristics of the land and the longstanding involvement of the local community in seeking its protection.

RFCG therefore asserts that the exclusion of Ryebank Fields from the proposed Local Green Space designations is not justified by the evidence.

The land should be included in the Local Plan as a Local Green Space. RFCG asserts that the available evidence demonstrates that Ryebank Fields meets the relevant criteria for designation as a Local Green Space.

4. THE COUNCIL'S ASSESSMENT AND EVIDENCE BASE

4.1 Introduction

RFCG asserts that the Council's assessment does not provide a sufficiently robust or policy-compliant basis for excluding Ryebank Fields from the proposed Local Green Space designations. The principal concern is that the assessment does not clearly distinguish between the land's potential for development and the separate question of whether it meets the criteria for Local Green Space designation.

A site's potential for development does not, in itself, establish that it lacks the recreational, environmental, landscape or community qualities required for Local Green Space designation.

4.2 Reliance on Previous Assessments

The assessment of Ryebank Fields appears to have been influenced by earlier assessments of the land's potential for development, including the Strategic Housing Land Availability Assessment (SHLAA) and previous strategic planning work.

RFCG asserts that these assessments serve different purposes from an assessment of Local Green Space suitability. Identification of land as potentially suitable or available for development does not exclude it from consideration as to whether it is demonstrably special to the local community or possesses particular local significance.

The Council should therefore have undertaken a clear and separate assessment of the land's suitability against the relevant Local Green Space criteria.

4.3 The Ryebank Road Development Framework

The Ryebank Road Development Framework ([Appendix 2](#)) precedes the adoption of Places for Everyone in March 2024. RFCG asserts that reliance on this Development Framework as part of the reasoning for excluding Ryebank Fields is problematic: it was prepared in a different strategic planning context and was not an assessment against the current NPPF criteria for Local Green Space.

The assessment should instead have been based on the current planning policy framework and up-to-date evidence concerning the land's existing characteristics and importance to the local community.



4.4 Application of the Local Green Space Criteria

The NPPF requires Local Green Space to be demonstrably special to a local community and to hold particular local significance. RFCG asserts that the Council's assessment does not adequately address the full range of characteristics relevant to Ryebank Fields, including:

- Established recreational use;
- Environmental and biodiversity value;
- Contribution to local landscape character;
- Accessibility to surrounding communities;
- Role within the area's green infrastructure; and
- Longstanding community support for its protection.

These matters are directly relevant to whether Ryebank Fields meets the Local Green Space criteria and should have formed part of a balanced assessment.

4.5 Community Evidence

Local Green Space designation is specifically concerned with places that are important to local communities. The sustained involvement of local residents and community organisations, including previous proposals for designation, therefore forms part of the evidence that the land is demonstrably special to the community. The strength and longevity of community support for Ryebank Fields provides relevant evidence of its local importance.

This evidence was recognised in Manchester City Council's own Draft Local Plan Consultation Statement following the 2020 citywide consultation ([Appendix 1](#)). The Council recorded that the campaign to protect Ryebank Fields was “by far the single biggest message coming from the consultation”. 44% of the total responses received pertained to protecting Ryebank Fields with 245 responses opposing development of the land. The principal request was that Ryebank Fields should be protected from development through designation as Local Green Space.

The Consultation Statement also recorded the reasons given by local residents for seeking protection, including the land's accessibility to local residents, its use for walking, running, dog walking, children's play and foraging, its value for wildlife and biodiversity, its contribution to climate change mitigation and local air quality, and its importance as a unique green asset within the urban area.

This evidence is significant because it demonstrates that the particular importance of Ryebank Fields to the local community was not a new or recent claim. It was clearly evidenced through the Council's own consultation process and recorded by the Council itself.

Further evidence of continuing community support is provided by the petition in support of Local Green Space designation for Ryebank Fields, included at [Appendix 3](#). The petition provides additional corroborative evidence of the continuing importance attached to the protection of Ryebank Fields by local residents and supporters. The petition is available online at: https://www.change.org/p/save-ryebank-fields?utm_source=chatgpt.com ([Appendix 3](#)).

Further, the campaign to Save Ryebank Fields has existed for over 30 years. This is evidenced by the Community's objections that were raised against a planning application for housing development submitted in 1995 which was refused by both Manchester City Council and the Secretary of State at appeal.

This evidence, together with the subsequent 2024 Local Green Space proposal and further evidence of



community use and value, should have received proper and proportionate consideration when the Council assessed whether Ryebank Fields met the criteria for Local Green Space designation.

RFCG asserts that this body of evidence has not been given sufficient weight in the Council's assessment.

4.6 Specific evidential concerns

The Strategic Housing Land Availability Assessment (SHLAA) asserts the potential availability and suitability of land for housing development. RFCG does not dispute that the SHLAA may be relevant to the Council's housing land supply work. However, SHLAA status does not determine whether land is suitable for Local Green Space designation. The two assessments serve different purposes.

A site may have potential development characteristics while also possessing significant recreational, environmental, landscape or community value. RFCG therefore asserts that SHLAA conclusions should not have been relied upon as a basis for excluding Ryebank Fields without a separate assessment against the Local Green Space criteria.

RFCG is concerned that previous strategic planning material, including the Ryebank Road Development Framework, has influenced the assessment of Ryebank Fields. The Framework predates the adoption of Places for Everyone and the current Regulation 19 Local Plan process. The Council should therefore ensure that its assessment is based on the current planning framework and relevant evidence rather than allowing historic development assumptions to determine the outcome.

4.7 Insufficient Consideration of Existing Land Characteristics

The assessment should consider Ryebank Fields as it exists and the qualities it currently provides to the local community. These include its woodland and meadow habitats, recreational use, accessibility, landscape contribution, biodiversity value and role within the surrounding urban area.

RFCG asserts that these characteristics have not been adequately reflected in the reasoning for exclusion. Evidence of community importance is directly relevant to the Local Green Space assessment.

4.8 Transparency of the Assessment

For the Plan to be capable of examination, the reasoning behind the exclusion of a proposed Local Green Space should be sufficiently clear to enable interested parties and the Inspector to understand how the conclusion was reached. RFCG asserts that the published evidence does not adequately explain how the land's identified community, recreational and environmental qualities were weighed against the reasons for exclusion.

Where the evidential basis for a conclusion is unclear, it becomes difficult to determine whether the relevant policy criteria have been properly applied.

4.9 Development Pressure

Ryebank Fields has been the subject of significant development interest. This makes it particularly important that the Local Green Space assessment is demonstrably objective and based on the applicable



policy criteria.

The existence of development proposals should not diminish the significance of the land's existing qualities. Rather, it reinforces the need for the assessment to distinguish clearly between development considerations and the separate question of whether the land qualifies for Local Green Space designation.

4.10 Overall Assessment

The evidence should be reconsidered using the current policy framework, with a clear distinction between:

- Housing land availability assessments;
- Strategic development considerations; and
- Assessment against the Local Green Space criteria.

This would provide a transparent and policy-compliant basis for determining whether Ryebank Fields should be designated.

RFCG's concerns are cumulative: the published reasoning does not provide a sufficiently clear evidential chain showing how the relevant Local Green Space criteria were applied to Ryebank Fields and how the substantial evidence of its community significance was weighed.

5. SOUNDNESS OF THE MANCHESTER LOCAL PLAN

5.1 Introduction

The concerns identified in Section 4 have raised substantive issues regarding the soundness of the Manchester Local Plan. The question is not whether the Council could have reached a different planning judgement. The question is whether the Plan is supported by an appropriate evidence base, justified by clear reasoning, effective in its approach and consistent with national planning policy.

RFCG asserts that, in relation to the proposed exclusion of Ryebank Fields, the Plan has not demonstrated that these requirements have been met.

5.2 Appropriate

A sound Plan should be based on an appropriate strategy, supported by proportionate evidence and should take account of reasonable alternatives. RFCG asserts that the exclusion of Ryebank Fields is not sufficiently supported by an appropriate strategy and proportionate evidence because the evidence does not adequately explain why the land's demonstrated community, recreational, environmental and landscape value does not satisfy the criteria for Local Green Space designation.

The reasoning also appears to give significant weight to previous assessments of development potential without demonstrating why those considerations should outweigh the evidence of the land's existing local significance.

The Council should be able to demonstrate a clear evidential and policy basis for the exclusion. RFCG asserts that this has not been established.



5.3 Consistency with National Policy

The proposed exclusion also raises concerns regarding consistency with the NPPF. Under the current NPPF, policy HC2 provides the specific framework for identifying Local Green Space, including consideration of whether land is demonstrably special to a local community and holds particular local significance.

RFCG asserts that the assessment has not adequately demonstrated that this framework was applied to Ryebank Fields. In particular, development potential should not be treated as determinative of whether the land meets the Local Green Space criteria. The Plan should therefore be reviewed to ensure that the assessment and resulting designation are consistent with the national policy approach.

5.4 Effective

An effective Plan should provide a clear and workable framework for the protection and management of locally important green infrastructure. RFCG asserts that the exclusion of Ryebank Fields is difficult to reconcile with the Council's wider objectives concerning green infrastructure, biodiversity, access to nature and the quality of the urban environment.

Where an area possesses established recreational and environmental functions and is demonstrably valued by the local community, its exclusion requires sufficiently robust reasoning. Without that, the Plan risks failing to provide an effective framework for recognising and protecting locally important green space.

5.5 Evidence and Reasonable Alternatives

RFCG asserts that the Council should have properly considered the alternative of including Ryebank Fields as a Local Green Space. Designation would recognise the land's established community and environmental value and provide an appropriate planning framework for its protection.

The evidence presented in this representation provides a reasonable and policy-compliant basis for inclusion. RFCG asserts that this alternative has not been adequately addressed in the Council's reasoning.

5.5 Relationship with Development Proposals

The existence of development proposals affecting Ryebank Fields should not determine whether the land meets the Local Green Space criteria. The appropriate approach is to assess the land's planning designation against its characteristics and the applicable policy framework. Development proposals should then be considered against the resulting planning framework.

RFCG asserts that allowing potential development to influence the assessment of whether land qualifies for Local Green Space designation risks reversing this proper sequence of consideration.

5.6 Overall Assessment of Soundness

RFCG asserts that the exclusion of Ryebank Fields raises concerns under three of the five soundness tests:

- **Appropriate:** The evidence and reasoning do not provide a sufficiently robust basis for the exclusion.



- **Effective:** The approach does not adequately recognise an area of established local green infrastructure and community value.
- **Consistent with national policy:** The assessment does not adequately demonstrate that the NPPF criteria for Local Green Space have been properly applied.

RFCG therefore asserts that modification is necessary to address these concerns.

5.7 Conclusion

RFCG asserts that the proposed exclusion of Ryebank Fields raises substantive concerns under the soundness tests of justification, effectiveness and consistency with national policy. The current published evidence does not explain why the land's demonstrated community, recreational, environmental and landscape value does not satisfy the Local Green Space criteria, nor does it distinguish that assessment from development-related evidence prepared for other planning purposes.

The appropriate modification is to include Ryebank Fields within the Local Green Space designations, subject to confirmation of an appropriate site boundary.

6. REQUESTED MODIFICATION AND FINAL STATEMENT

RFCG respectfully requests that the Inspector finds the proposed exclusion of Ryebank Fields to be unsound and requires the Manchester Local Plan to be modified so that Ryebank Fields is included within the Local Green Space designations, subject to confirmation of an appropriate boundary.

If the Council does not propose that modification, RFCG requests that the Inspector carefully examine whether the Council has properly applied the Local Green Space criteria, adequately considered the evidence submitted by the local community, and provided sufficient justification for the exclusion.

RFCG asserts that the evidence demonstrates that the land meets the relevant criteria for Local Green Space designation and that its exclusion from the Manchester Local Plan has not been adequately justified.

The assessment should be based on the land's existing characteristics and its importance to the local community, applying the relevant national and local planning policies. Development potential should not be treated as determinative of whether the land qualifies for Local Green Space designation.

Ryebank Fields should be protected as a Local Green Space for the benefit of the present and future communities that it serves.



APPENDICES

The appendices contain the key supporting evidence referred to throughout this representation and should be read alongside the relevant sections of the main representation.

APPENDIX 1

- Friends of Ryebank Fields Local Green Space Proposal (2020);
- Friends of Ryebank Fields Local Green Space Proposal (2024); and
- Dr. Jenna Ashton's Working Research Report (2020) submitted in support of the Local Green Space proposals.

APPENDIX 2

- Manchester Local Plan Draft (September 2025);
- *The Environment Partnership (TEP) Local Green Space Assessment Report;
- Strategic Housing Land Availability Assessment (SHLAA) material relating to Ryebank Fields;
- Ryebank Road Development Framework (2019);
- Relevant Places for Everyone documents;
- Relevant Local Plan evidence base documents;
- *Relevant Council reports and decision-making records.

* Supplementary documents

APPENDIX 3

- *Correspondence between Ryebank Fields Community Group (RFCG) and Manchester City Council;
- *Representations and requests for clarification concerning the exclusion of Ryebank Fields;
- *Related procedural correspondence;
- The Change.org petition in support of Local Green Space designation for Ryebank Fields.
- **Requests for information submitted under the Environmental Information Regulations 2004 (EIR 2004) and Manchester City Council responses to those requests;

** RFCG submitted an Environmental Information Regulations 2004 (EIR) request to Manchester City Council on 22 July 2026 (reference FOI/20811), seeking the underlying documentation relating to the Council's assessment of Ryebank Fields for Local Green Space designation and the reasons for its exclusion from the Stage 3 list. The request included assessments, evaluation and scoring material, records identifying the evidential and policy basis for the exclusion, and records concerning the decision-making process.

In its response dated 19 August 2026, Manchester City Council confirmed that it holds some of the information requested but withheld that information under Regulation 12(4)(d) of the EIR, on the basis that it relates to draft material. The Council also stated that it does not hold information falling within questions 6, 7 and 9 of the requests. RFCG has requested an internal review of the Council's response. That review remains ongoing at the date of this representation.

APPENDIX 4

- National Planning Policy Framework (NPPF);
- *Environment Agency consultation response dated 16 June 2026;
- *Phase 1 Geo-Environmental Report;
- *Remediation Report / Remediation Cost Assessment;
- *Flood Risk Assessment;
- *Preliminary Ecological Appraisal;
- *Tree Survey;
- *Land and Location Map.

* Supplementary documents