

Edgeley Wildlife Reserve Group

Objection Document

Appendix 1.

ARBORICULTURAL ASSESSMENT RESPONSE

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About This Document

This document (*Appendix 1: Arboricultural Assessment Response*) is a response to the Arboricultural Assessment submitted by TEP/ the developer as part of the Planning Application DC/092211

It forms part of a series of documents in objection to the Outline Part of Hybrid Planning Application DC/092211 - proposing the expansion to the football club stadium to provide up to 7,405 additional seats.

The other EWRG objection documents this Appendix refers/relates to are:

EWRG Objection Documents

- Part 1: Introduction
- Part 2: Site Boundaries
- Part 3: Ecology & Biodiversity
- Part 3b: Visual Evidence
- Part 4: Community, Health & Education
- Part 5: Water, Drainage & Flooding
- Part 6: Conservation Area
- Part 7: Alternatives / Parking & Traffic
- Part 8: Summary

Terms used

EWR = Edgeley Wildlife Reserve

EWRG = Edgeley Wildlife Reserve Group

AIA = Arboricultural Impact Assessment (TEP/Developer Document)

1. What is Edgeley Wildlife Reserve



View into Edgeley Wildlife Reserve

Woodland Classification

Edgeley Wildlife Reserve meets the criteria that government department The Forestry Commission (responsible for protecting, expanding and promoting the sustainable management of woodlands) sets for itself with regard to woodland definition. Therefore, Edgeley Wildlife Reserve is a Woodland, as classified by central government. Deciduous Woodland is an asset that provides Ecosystem services, life-sustaining benefits we receive from nature.

The woodland canopy provides; water interception by rain falling onto a large canopy and infiltrating into the roots, mitigating flooding; temperature control by providing shade and evaporative cooling; and, clean air by absorbing carbon (released with felling).

Ecosystem services are important to environmental and human health and well-being, their beneficial opportunities are limited and often taken for granted. EWR currently contributes extensively to Ecosystem services and has the potential to contribute considerably more if it is left intact and enhanced by the community and partners. This area is at the heart of a biodiverse network. The nature emergency is as significant as the climate emergency and has to be taken as seriously. Damaged and dysfunctional ecosystems are contributing to this emergency.

Under the Woodland definition as defined by central government at gov.uk (see below), EWR currently constitutes a **Woodland**.

- Minimum area of 0.5 ha (5,000 sq m).
- Minimum width 20m
- Potential tree canopy cover of at least 20% *i.e.* normally 50 tree stems for 0.5 hectare as a stocking density
- Canopy consisting of specimens that meet the definition of trees

2. Policy, Designations and Protection

Planning Policy

All trees are a material consideration in the planning process. Effects on trees will therefore be considered by the consenting authority. Adverse effects that cannot be mitigated and which are not acceptable on balance against other benefits may weigh against the granting of planning permission.

AIA, 2.30, p11,

The Tree report advises that the mitigation planting that will be provided for the detailed part of the application will provide a surplus that will be offset against the future removal of the EWR woodland. Loss of this woodland **cannot** be mitigated on site. It is irreplaceable. Collectively, the detailed planting scheme (*i.e.* what will be provided now for the detailed application) comprises of a linear section, a tree cluster within the away fan car park, and tree pits. Combined, they do not meet the criteria of Woodland as defined by central government.

For the Outline Application, the mitigation scheme will be detailed as Reserve Matters within a future application and **cannot** mitigate the loss of this woodland **on-site** even by combining woodland enhancement/hedging with the “*surplus provision*” in the detailed application.

Creation of the car park, as per the outline application plan, will result in the retention of only 15,600² ft of the current woodland, which purely by definition of size, will mean that it can no longer be defined as woodland.

The proposed landscape plan shows “*Proposed birch and pine trees with woodland understorey planting*”. The collective areas provided by a narrow 3 meter wide long strip and the grouping which is being presented as ‘*mitigating woodland*’ is shown in this image. These are separated by housing and a road.



Diagram of supposed Woodland Mitigation Plans

The image below shows the planned mitigating woodland sections (the 3m wide strip and the Away Fan car park area) in relation to the size of EWR. It can be clearly seen in the image below that the planned mitigating woodland is a tiny fraction of the Woodland that is currently there.



Area comparison of Woodland Mitigation Plans

Stockport County Football Club parking requirements can be catered for in an alternate way (*see EWRG Objection Document, Part 7: Alternatives*) - For example, provision of a **two-tiered car park** on the other planned parking area. Edgeley is an area seriously deprived of natural space and woodland. Edgeley needs woodland. We believe that the adverse effects connected to the destruction of a woodland are not acceptable. The immediate and long term benefits of retaining the Deciduous Woodland, on balance, far better meet the aims of objectives of local and national planning policies.

TEP state that the following is planning policy:

“There should be a common-sense ambition to limit tree loss to that which is strictly necessary to facilitate the proposal, and to achieve a good design.”

AIA, 2.31, Page 11,

Pursuant to Stockport Councils Core Strategy Policy CS8 Safeguarding and Improving the Environment Part A – Protecting the Natural Environment and the obligatory emerging local nature recovery strategy, the council should request, consider and review other design possibilities which would meet the common-sense ambition to limit tree loss according to planning policy.

National Planning Policy Framework & Joint Nature Conservation Committee

The National Planning Policy Framework (NPPF) has an **overarching environmental objective. This embeds protecting and enhancing the natural environment, improving biodiversity,** and adapting to climate change in decision making.

The Joint Nature Conservation Committee (JNCC), advisor to central government on nature conservation, have produced a joint statement by the Statutory Nature Conservation Bodies of the UK and shared the joint call for urgent action at COP15. It is:

We all have the opportunity to act with courage and vision to restore the ecosystems upon which we all depend. Biodiversity loss is already causing serious harm to people and it is a profound threat to humanity's future. It is not too late to change course, provided we act now. With the challenges currently facing the UK, there has never been a more critical or opportune time to invest in nature's recovery. The evidence is clear. Nature is our life support system and our economy is embedded in nature. Investing in nature's recovery is investing in our economic prosperity and societal wellbeing. The sooner we act to recover nature, the sooner and greater the benefits we reap. **We know that recovering nature leads to environmental security. Without healthy nature, climate stabilisation, economic security, water security and food security cannot be achieved.** By investing in nature within everything we do we are investing in the prosperity and wellbeing of all. We know the relationship between climate and biodiversity is inseparable and societies must focus on both in tandem. If we fail on one of the biodiversity or climate crises, we fail on both. We know how to harness nature's ability to increase the prosperity and wellbeing of our four countries and we know that nature is the key to increasing our resilience and improving our environmental security. Working together we will support governments, business, and broader society to achieve nature's recovery by:

Embedding environmental security and nature's recovery into UK decision-making frameworks. Especially when considering threats to the UK's economic security.

Nature Recovery for Our Survival, Prosperity and Wellbeing, JNCC

The council should be prioritising and implementing projects on the ground in order to comply with The National Planning Policy Framework and guidance being set by central government and its advisory bodies. EWR is a perfect example of how local government, business and broader society can support environmental security (see *EWRG Objection Document, Part 4: Community, Health & Education*)

The NPPF also states that

- **Existing trees should be retained wherever possible.**
- **Planning policies and decision making should recognise the wider benefits from natural capital and ecosystem services, including those provided by trees and woodland, and minimise impacts on and provide net gains for biodiversity.**
- **Where significant harm to biodiversity cannot be avoided, mitigated, or compensation provided, planning permission should be refused. Loss or fragmentation of trees and woodland may constitute or give rise to significant harm to biodiversity.**

The creation of the car park will cause significant harm to biodiversity by the loss of a Deciduous Woodland. This council owned woodland should not be vulnerable to development. It should be at the heart of Stockport's biodiversity strategy.

The Woodland Trust

Letting areas of land regenerate naturally creates vital habitat as well as corridors that help wildlife spread across the landscape.

There is an urgent need to make small woodlands bigger and connect them within networks of other nature-friendly habitats. In this way can we begin to reverse the collapse of biodiversity and create the opportunities for species to adapt.

Wildlife-rich landscapes are also becoming fragmented. In the past, species could move between patches of habitat and colonise new areas.

The Woodland Trust

The council should ensure that Stockport benefits from the additional planting that is proposed for the detailed application in conjunction with saving the EWR woodland to improve and maximise the corridor of nature friendly habitats. Evidence of the negative effects of fragmented nature habitats is provided by professionals and organisations. The loss of mature tree canopy and woodland floor ecotones would be devastating to the wildlife that relies on this area for survival.

Local Authorities are legally bound to national commitments to protect, designate and enhance nature friendly habitats such as EWR (see *EWRG Objection Document, Part 3: Ecology and Biodiversity*).



NPPF states:

There is a strong policy presumption against loss or deterioration of irreplaceable habitats, such as ancient woodland and ancient or veteran trees. Development resulting in the loss or deterioration of irreplaceable habitats should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

AIA states:

Not all mature trees or those of high habitat interest are veterans. Trees with individual or simple assemblages of features typically associated with veteran trees were also noted (appendix A).

The AIA document has recorded and refers to individual and groups of trees using *T#* and *G#* respectively. T9 (individual Tree) is a large multi-stemmed Elder tree which looks to be included within the Retained Area parameter plan (*i.e.* not for felling but could be included for felling in reserved matters). The Arboricultural Surveyor notes *"not quite a veteran tree but certainly with significant habitat, **very sensitive to disturbance and difficult to recreate** in the short or medium term. It represents the most likely source of a future veteran tree within the study area"*.

The planned development and adjacent tree removal will impact on the surrounds putting this tree at risk and also the surrounding habitat which this tree influences.

The flowers provide nectar for a variety of insects and the berries are eaten by birds and mammals. Small mammals, such as dormice and bank voles, eat both the berries and the flowers. Many moth caterpillars feed on elder foliage, including the white-spotted pug, swallowtail, dot moth and buff ermine.

Value to wildlife, -The Woodland Trust

Stockport Core Strategy Policy

The Council will not permit the demolition of buildings or the felling of trees where retention is necessary to preserve the character or appearance of the Conservation Area. Trees are an important part of the street scene. The removal of even **a single tree can detract significantly from the appearance of a street, not least in Conservation Areas where trees, often of considerable age, are an integral part of their character and appearance**. Advance notice must be given to the Council of any proposal to fell a tree in a Conservation Area and the Council will through **this policy and Policy NE2.1 seek the protection of significant trees**. Where approval for tree felling is granted the Council will require appropriate replacement planting.

UDP Policy HC1.1 – Demolition and Tree Felling in Conservation Areas

The proposed new car park to be created by removing the current woodland will be visible from the conservation area via Moscow Rd East and the reservoirs. The woodland view including high level tree canopy beyond the retained section would be lost. Thus a view of the car park would clearly be visible from these same areas, especially in winter, and the proposed planting/screening program will not hide this. Therefore, removal of this woodland will have a negative visual impact thus being detrimental to the appearance and characteristics of the Alexandra Park Conservation Area. (See page 9 (Appendix A)).

Natural Environment and Rural Acts 2006

All public authorities, including local planning authorities and statutory undertakers have a duty to have regard to the purpose of conserving biodiversity. Habitats of Principal Importance provide a means of evaluating effects on biodiversity, and thereby a metric to demonstrate the discharge of this duty. In the context of planning, adverse effects on Habitats of Principal Importance that cannot be mitigated are material to decision making.

NERA 2006

Central Government classifies all types of native woodlands as woodland priority habitats. Priority habitats have the potential to provide the richest and most varied components of biological diversity within the UK. Increasing woodland creation in England is in line with their aspiration of 12% cover by 2060.

Although EWR is not mapped as a Habitat of Principal Importance maintained by the Secretary of State this does not alter the fact that it meets the governments criteria and characteristics for a Woodland. Deciduous Woodland is a Habitat of Principal Importance. As the ONLY area in Edgeley capable of sustaining wildlife to any meaningful degree, in terms of local importance, it is clear that EWR should be recognised as a habitat worth designating and protecting. The loss of this woodland can never be mitigated by the proposed landscaping plans presented by the club.

Local Planning Policy

Stockport Metropolitan Borough Council has an adopted Development Plan that contains policies of relevance to trees and this site. These policies are contained within the 2011 Core Strategy DPD and are saved policies from the 2006 Stockport Unitary Development Plan (UDP). See Core Strategy policies SD-6; CS8; SIE-3 and UDP policy HC1.1 below:

Core Strategy Policy SD-6 – Adapting to the Impacts of Climate Change

Development, particularly within the urban area of the Borough, that takes into account the urban heat island effect and incorporates measures to reduce this phenomenon will be given positive consideration. Measures might include:

- Provision of appropriate green cover (shaded green space and tree cover)
- Provision of green roofs, walls and boundaries

The main cause of the Urban Heat Island (UHI) effect is from the modification of land surfaces. The negative impacts associated with UHI effect are well documented and include increased rainfall and

poorer air quality. The woodland reduces the temperature of the immediate urban area. The development will increase the UHI. The existing woodland currently counters the UHI effect. Development proposals will increase the UHI effect.

Core Strategy Policy CS8 – Safeguarding and Improving the Environment

The Council working with local communities, developers and partners, will **protect**, develop and enhance an integrated network of high quality and multi-functional **GI** (Green Infrastructure) that will mitigate the negative effects of climate change and support biodiversity, for example inclusion of green roofs, green walls and tree planting.

The council, developers and partners, have the opportunity to protect and enhance this Green Infrastructure instead of suggesting mitigation measures to counter its destruction.

EWR already exists as valuable Green Infrastructure in terms of local access to current, future and potential ecosystem services and natural space value to the Edgeley and wider communities. Ecosystem services is not just an environmental issue but an economic and social issue as it not only affects the environment but also the economy and individual wellbeing. Habitat loss is amongst the most prolific threats to ecosystem services.

Stockport Council have dedicated service teams and a long, successful history of partnership working with community groups, external funders, charitable organisations, private sector organisations and the Association of Greater Manchester Authorities to deliver and implement green infrastructure projects that have secured provision of both capital and revenue resource streams.

Have the council assessed possible opportunities that retaining this Deciduous Woodland would present, particularly by suitably identify opportunities of the trees and woodland maturing from it's present status combined with partnership working/management?

Core Strategy Policy SIE 3– Protecting, Safeguarding and Enhancing the Environment

What we're going to do or require:

A) PROTECTING THE NATURAL ENVIRONMENT:

Development proposals affecting **trees, woodland and other vegetation** which make a positive contribution to amenity should make **provision for the retention of the vegetation** unless there is **justification** for felling, topping or lopping to enable the development to take place. Even where there is a strong justification for a proposal the design should maximise the potential for retaining some mature planting, and replacement planting of appropriate species and covering a similar area should be provided within the site or nearby. Proposals that will result in an **increase** in the woodland cover of the borough (including planting of trees as a bio-fuel crop) will be given positive consideration as long as it is not harmful to existing habitats or ecosystems.

This 'strategy policy' is titled '*Protecting, Safeguarding and Enhancing the Environment*'. By definition, In natural environment terms, the words *protecting* and *safeguarding* infer a relation to existing habitat and

enhancement to improving or adding to existing habitat. Other binding policies aimed at guiding environmental strategies local and national and supported by legally binding commitments, establish grounds to challenge any justification for felling, topping or lopping of any vegetation on this site in the context of the outline part of this planning application. These policy and strategy commitments are covered in full in *EWRG Objection Document Part 3: Ecology and Biodiversity*.

The trees, woodland and vegetation already make a positive contribution to local 'amenity' in terms of the site's uniqueness to the area of Edgeley. The potential for ecoservice resource by way of natural green space is simply awaiting designation and enhancement. There is therefore no 'justification' in view of the possibility of alternative options / architectural amendments to the existing outline part of the application. Especially as, as plans stand, (evidenced by this document) there is NO INCREASE to woodland cover in the borough as a result of this application.

The council needs to turn words into tangible results. Safeguarding this existing woodland would meet the aim of Protecting the Natural Environment.

3. Arboriculture Impact Assessment

The Environment Partnership (TEP) undertook the Arboricultural Impact Assessment (AIA) in support of the hybrid planning application. In Survey Method, Appendix B, they state the methodology of how the survey has been carried out. This includes condition, maturity, crown spread and locations of trees. Woody vegetation is either recorded as an individual Tree, Group of Trees, Woodland or Hedge-row.

It is important to understand that the survey details arboricultural effects for the outline application. *The AIA states, "In-principle effects are those that would certainly occur but cannot be described in detail now."* EWR falls into this category. Outline planning permission would establish the principle that such effects are acceptable without knowing which trees are to be retained, felled or pruned. The Parameter Plan that is supplied does not contain this information either.

Unless a significant re-design occurs for the outline part of this application, granting planning permission now will result in significant tree loss. (See *Drawing 3. Tree Works Plan – Outline Application (EFFECTS)* submitted on the planning application portal as part of the AIA.

TEP state they have used the methodology of counting the number of individual trees within the Groups (see below). The methodology advises counting, *"The number of stems arising below a height of 1.5m, or for Groups, Woodland and Hedgerows an estimate of the **number of trees.**"* Therefore, the number of trees, in each Group should be listed in the survey data sheets provided by TEP. This is what Edgeley Wildlife Reserve Group has utilised to calculate approximate numbers of trees for felling.

Information contained within the AIA is not sufficient to enable a count of all the trees that are to be felled for the outline application and within EWR. This is primarily due to trees being in Groups rather than the identification and plotting of individual Trees. According to their data, there are at least 115 individual trees to be felled. As can be seen in the image on page 16 **ALL** of these trees fall within the designated Conservation Area. Additionally this Woodland is designated as Local Open Space.

Information contained within the AIA is not sufficient to enable a count of all the trees to be felled for the full application. **This is** due to Groups containing Buddleia bush, however **every single** individual and group of trees in the full application boundary area are to be felled, barring approximately 10 saplings located in the Away Fan car park.

Grouping of Trees - Why this is not appropriate

Whether vegetation is recorded individually (Trees), Groups, Woodland or Hedgerow, is at the discretion of the surveyor. Within EWR the surveyor has grouped 280 trees into 5 groups. There is no justification or reasoning provided to enable an understanding of why. Classifying trees as Group rather than as individual Trees saves the applicant time/work/effort/money. There is a lower level of report transparency, visualisation of the tree area and difficulty in assessing the identify of trees to be felled or any benefit to the natural environment of individual trees.

According to *Appendix B*, the TEP survey method states that, “Typically, Trees (as single entities as opposed to Groups) are recorded where they are arranged separately; different from adjacent trees; or where the assessment would benefit from greater detail.” **Under this methodology the surveyor should have provided a survey of Trees instead of Groups.**

The trees in the Groups listed as G5 and G7 comprises 110 trees and are **different from each other and adjacent trees in species, height, condition and maturity**. They range from 4m-16m in height and 50–780 mm in stem diameter. The trees in group G6, comprises 25 trees that have stem diameter ranges between 400-1200mm, and as noted by the surveyor, “contain 4 substantial trees and are a major component in the overall woodland character of the area.”

All the trees in these Groups have a long, estimated remaining contribution (over 40 years) for the young, middle aged and mature trees contained within this Deciduous Woodland and range from young to mature. Therefore, how can the assessment **not benefit from greater detail** (i.e. classifying trees individually rather than Groups) for reasons such as:

- a) The ability to accurately understand/picture the height, maturity, condition and health of individual trees to be felled
- b) The ability to accurately understand/picture trees of note or importance to be felled
- c) Recording canopy spread - Grouped trees do not have their individual canopy spread/size recorded
- d) Recording the stem location of each tree
- e) The inability to identify, utilising current plans/literature, which trees are to be felled along the removal/retention border region
- f) To enable the community to request a TPO for trees at risk
- g) Recognising the wildlife habitat value of individual trees

For example, there exists a magnificent specimen of hawthorn located along the development border region which may be in the removal or retention category. Even if this is in the retention category the AIA advises that removal of additional trees may be requested in the future due to vegetation overhanging vehicles.

The assessment does not provide a drawing showing the combined number of all trees to be removed.

Lack of detail to understand trees to be felled in outline application

Tree Groups G5, G6 and approximately 90% of G7 trees are to be felled, additionally Tree 8. These tree Groups comprise, Sycamore, Ash, Goat Willow, Elder, Goat Willow, Downy Birch, Hawthorn, Holly, Bird cherry, Oak, Grey willow. As detailed earlier it cannot be known, by either decision makers or the community (i.e. those who may want to object), what type, size, condition or canopy spread each tree to be felled constitutes.



4. Tree Protection

Tree Preservation Orders and trees within a Conservation Area

Stockport Council mapping shows that group G8 was protected by a tree Preservation Order (Reservoirs, Edgeley 1981) which has since been revoked. This does not take away the worthiness of this status, rather it is that the council does not place TPO's on trees on its own land because they are evaluated and protected by the virtue of being council land. TPOs are created under the provisions of the Town and Country Planning Act 1990 and associated Regulations.

This means that it is an offence to:

- cut down
- top
- lop
- uproot
- wilfully damage
- or wilfully destroy a tree without the planning authority's permission

This act recognises the importance of protecting trees that are worthy of a TPO.

National Government Policy

Explains the legislation governing Tree Preservation Orders and tree protection in conservation areas. Removal of trees within a conservation area requires a 6 week notice to the authority in order that they may assess whether a TPO would be appropriate and if so TPO controls and procedures would apply.

SMBC Website

Trees in a Conservation Area are protected by the provisions of the Town and Country Planning Act 1990 (Section 211) and associated Regulations. If work is required on a tree within a Conservation Area, you **must** notify the Arboriculture Team of your intention to carry out the proposed tree works. All types of trees over 75mm diameter and 1 metre high are covered by Conservation Area status, except hedges, bushes and shrubs.

TEP methodology does not advise that trees 1m or above are included in the report. If these trees are covered by Conservation Area status then they should, at this stage, be included in tree numbers for which in principle authorisation is being sought.

Edgeley Wildlife Group are raising objections about individual trees and request that SMBC assess implementation of TPO status on seeking TPO's (or equivalent) on individual trees within EWR based upon a number of reasons:

1. reaching goals committed by government in regard to protecting biodiversity
2. historic TPO's being revoked on this land due to council being custodians of trees, prior to lease agreement
3. protection of trees providing habitat interest
4. importance of contribution to the character, landscape and distinctiveness of the Conservation Area
5. the time for new planting to reach maturity
6. in view of "*in principle effects that would certainly occur*"

Pre-Application Council Advice

Discussions were held in September 2022. One of the principle points agreed was "*direction from Council to forecast/measure canopy cover for new trees at middle age onwards.*"

EWR is raising concern about whether this advice meets British Standard/policy/good practice guidance.

Agreed Priorities - Council / Developer:

- Lack of significant off-site planting opportunities in the vicinity, that are under council control, make **planting on-site a priority**.

There is a lack of significant off-site planting opportunities in the vicinity due to the size of area and number of trees that will be removed. As already documented on-site planting, according to the landscape proposal plans submitted, will not be adequate in mitigating for the loss of the existing habitat and woodland provided by EWR.

- **Level changes necessitate tree removal for south stand because of steep existing bank.**

Alternatively, differing architectural plans could be considered. The majority of the trees will be removed to create a car park which is entirely unnecessary. (See EWRG Objection Document - *Part 7: Alternatives/Parking & Traffic/Car park Survey.*)

- Retain and augment woodland belt around reservoir, principally through understorey planting and removal of Japanese Knotweed .

The club is implementing a Japanese knotweed removal programme. A car park is not the only solution to knotweed. A partnership managed, designated and enhanced Nature Reserve would also seek to

replace the knotweed with enhanced native tree and understorey cover. The council has an established process for Japanese Knotweed removal on council land, however, if required, grants for Knotweed removal are available via conservation and private organisations as well as governmental backed stewardship schemes.

Environment Act

Biodiversity is only one of the benefits provided by trees. **Tree removal and planting may affect other functions or objectives, and the BNG assessment process does not provide a comprehensive means of either evaluating, mitigating or offsetting effects on arboriculture**

AIA, p15

In general terms, effects on arboriculture should be assessed in parallel to biodiversity, and any overlap between assessments identified. Tree planting or enhancement for biodiversity should be treated as part of arboricultural offsetting measures, and supplemented as necessary by other measures to render all adverse arboricultural effects acceptable. On this site, further guidance has been provided via correspondence with the **SMBC tree officer and it is understood that tree planting for BNG purposes can be counted towards an overarching tree replacement objective planting.**

AIA, p15

What does the sentence (indicated by bold blue type) actually mean? Please explain.

Conservation Areas

They are areas of special architectural or historic interest that are worthwhile preserving or enhancing their character or appearance.

Stockport MBC website Conservation areas

Mature trees, which can clearly be seen from a public highway/path/cycle way, are to be felled. This will impact on the character and appearance of the conservation area. The views add to the character and mature landscape feel of the Alexandra Park Conservation Area. The EWR trees and wild space provide a sense of a cool, quiet, unusual space, improve the characteristic of the location and provide attractiveness in and for our community. Photographic evidence of trees and vegetation to be felled according to the plans and visible from the street within the Conservation Area are included as *Appendix A* on page 27. It should also be noted that the entirety of the habitat to be removed is fully visible from the footpath that runs parallel with the Conservation Area

A check with the local authority was undertaken on 27th March 2024. The online mapping system confirmed that **some trees** to the south of the site are located within the Alexandra Park, Edgeley Conservation Area. This broadly covers survey features T8, T9 and G5 to G13

AIA, Conservation Areas, p15

This is incorrect! **ALL of the trees** to the south of the site are located within the Alexandra Park, Edgeley Conservation Area!

At pre-app on 20th September 2022, Paul Hartley (SMBC Conservation) confirmed that the Alexandra Park Conservation Area is a designated heritage asset, and the area of the site located within it is designated as key open space and also includes some key trees and tree groups. It was also outlined that Mature trees contributing to the character of the conservation area to be retained where possible. Following correspondence with Heritage Architecture, although **all trees located within the Conservation Area make a positive contribution to its historic character, tree groups G6, G8 and G9 are considered to be of particular historic value** due to their age and their historic link to the fringe environment around the reservoir.

AIA, Conservation Areas, p16

Group 6 (G6) is divided into two sections totalling 25 trees. Both of these sections would be felled should this outline application be approved.

Alexandra Park Conservation Area Character Appraisal (October 2006 / Updated 2012) includes reference to significant groups of trees defining and articulating spaces and routes, and framing views being a criteria of the designation of the Conservation Area. In effect, granting the outline part of this application would amount to a precedent in the dismantling of the designated Conservation Area.

There would be no known effects on trees within a Conservation Area. **Outline planning permission would establish the principle that such effects are acceptable, but the extent, location and timing would be established later, normally as reserved matters.**

AIA, Conservation Areas, p27

Additionally,

The proposed development may result in an increased likelihood of applications to prune or remove trees within the Conservation Area in the future. This would likely be a result of maintaining the required clearance of retained trees overhanging the South Stand car park.

AIA, Conservation Areas, p27

Combined, the un detailed parameter plan, trees being in Groups and the above statement provide no clarity of which trees will be safeguarded should planning permission be granted. And the council will have given permission that the principle of such effects are acceptable for a Woodland in a Conservation Area on public Open Space.

In Section 3 the AIA advises that inclusions for the priorities for trees within the proposed development include:

- Maintenance and enhancement of habitat corridors
- Retaining and enhancing the backdrop for views across the reservoir and from the conservation area
- No net loss of tree canopy cover, and enhancement where possible

There would be in-principle effects on trees within a Conservation Area due to the removal of G5; G6 and a large proportion of G7. **These trees are generally not visible from within the Conservation Area.**

AIA, Conservation Areas, p28

This is not true. Leaf cover varies throughout the seasons and especially during the late autumn, winter and early spring months there is visibility from the conservation area across the entire site. During the summer reduced visibility from the conservation area may be true, however views from the Moscow Road East, the adjacent reservoir and pedestrian/cycle route provides **an integral part of the character and appearance of the conservation area**. Providing a screening hedgerow will not provide a woodland view with a woodland edge where glades and grassland habitat provide open areas.

Photographic evidence of trees and vegetation to be felled according to the plans and visible from the street within the Conservation Area are included as *Appendix A* on page 29. It should also be noted that the entirety of the habitat to be removed is fully visible from the footpath that runs parallel with the Conservation Area.

Community Forests

The area planned for development exists within a community forest, being the City of Trees Community Forest.

Online mapping confirmed that the site is within the City of Trees Community Forest. An approved Community Forest Plan may be a material consideration in preparing development plans and in deciding planning applications.

AIA, Community Forests, p 17

With this application, trees within a City of Tree Community Forest will be removed.

EWR can be assessed by City of Trees, free of charge, via an invitation by the council with regard to potential for further enhancement. City of Trees will work with landowners and communities by providing trees, planting schemes and volunteers to undertake improvement projects.

Habitats of Principal Importance – UK Government

A list of habitats which are of principal importance for the purpose of conserving biodiversity is maintained by the Secretary of State. The geographical extent and location of these habitats is mapped by Natural England on the Priority Habitat Inventory. The list includes habitat types that are defined by woody vegetation and includes Deciduous Woodland.

Natural Environment and Rural Acts 2006

All public authorities, including local planning authorities and statutory undertakers have a duty to have regard to the purpose of conserving biodiversity. Habitats of Principal Importance provide a means of evaluating effects on biodiversity, and thereby a metric to demonstrate the discharge of this duty. In the context of planning, adverse effects on Habitats of Principal Importance **that cannot be mitigated** are material to decision making.

The area containing survey features G5, G6, G7, G8, G9, G10, G11, and T9 are not mapped as Deciduous Woodland, but they form a single woodland area that has the characteristics of a Habitat of Principal Importance. The better-quality woodland that fits the habitat description more closely is in the south and west, although these trees also benefit from being part of a larger woodland parcel.

AIA, p18

The methodology advises Woodland is recorded where areas of tree cover have the qualities of a woodland habitat, including age and species structure, natural regeneration, and associated non-arboreal features.

The AIA states: *"2 trees and 9 groups of trees are within a conservation area. The survey found that some trees collectively form a Deciduous Woodland and should be regarded as such."*

The following table provides the aggregated canopy area for mapped trees and the total length of mapped hedgerow on Drawing 1 (shows detailed and outline area). In some cases this may be more than the absolute area due to canopy overlap between adjacent features."

So, as per EWRG reasoning for recording Trees rather than Groups, this statement alludes to less canopy being measured and mitigated for than is actually there.

Trees	Groups	Woodland	Hedgerow
0.0141 ha	0.7847 ha	0 ha	61 m

Table 1 Existing canopy cover, Section 2.12, p7, AIA

Woodland canopy is not included in this aggregated table of existing canopy cover. The government criteria details that this is woodland and the AIA advises (see the two paragraphs quoted above) that "this area forms a woodland and should be treated as such"

5. Effects & Mitigation

Types of Effect

This report supports a hybrid planning application. Tree removal and retention for outline elements of the site is a reserved matter and would not be determined by this application, **except for tree removal that is necessary to facilitate detailed parts of the layout.**

AIA, 3.14, p24

We understand that this means that the Outline element of the application (*i.e.* EWR) and the “retained” section are not adequately safe from felling. See page 20 of this document.

In Principle Effects – Outline Application

The woodland is not without problems. It is at least partly growing on demolition or building material, possibly associated with the former use of the land, and there is significant litter and waste material within the area. It is clear from historic mapping that the lower ground occupied by group G7 is a former reservoir, and the infill material is of unknown composition and stability. It is possible that when these trees reach mature height, they would become unstable.

AIA, 2.20, p8

This is a purposely vague explanation in an attempt to devalue the woodland area. Sounds like a red herring! What is the litter and waste material that is referred to? Is this easily removable surface debris or if it is underground, how has this been established? Have trial pits or land surveys been completed? This is guesswork, equally trees in this location can provide a long-term remaining contribution. The sub bases of arterial highways, including motorways and A roads, are commonly constructed of crushed aggregate which comprises crushed inert waste material *e.g.* 6F2. This is in line with the government’s Waste and Resource Action Program. When this type of material has been incorporated, over time, it settles and becomes stable.

There would be in-principle effects on Deciduous Woodland due to the removal of G5; G6 and a large proportion of G7. These are part of the woodland area to the south of the south stand, which would be reduced in size by the development, although tree planting elsewhere on the site would more than offset this.

AIA, 3.42, p28

This is a disingenuous statement. Thirty years of predicted canopy cover growth will not more than offset woodland removal. There will be not be a woodland floor in the car park and future tree retention/survival predictions are unforeseen.

This offset statement relates to the below agreement for provision of 1 sapling planted to replace a current canopy of 41m². Net gain for 30 year forecast is guesswork, banking on the best possible outcome of trees surviving and thriving. Many new trees do not survive and canopy cover for the trees that are removed will have grown considerably within that time. BNG, (detailed on Page 25) is a new process, and Stockport MBC as with all others are still working out what the process will be never mind how it's short or long term success is measured.

The AIA advises that via agreement with the tree officer they can use the BNG Metric to describe 'small trees' for all new individual tree planting. This figure embeds a forecast for canopy growth because it is based on a 30-year outlook rather than the size of trees on the day they are planted to allow for canopy growth of saplings to become 41m².

The tree removal canopy area for the outline application is 2,525m² with the proposal of 37 new trees to be planted within this area. Quite apart from measuring canopy, the below features of a woodland would not be recreated in the areas that the majority of the offsetting planting would be provided.

Mixed Deciduous Woodland Habitat Features

Mixed Deciduous Woodland supports the most wildlife species if it is diverse in structure. Open soil, leaf litter, a complex structure of canopy and older and younger trees, scrub, standing and fallen dead wood, and a variety of plant ground cover - each feature increases biodiversity and adds to the range of species supported. Key requirements for supporting the biodiversity is to consider the requirements of key species such as woodland birds to ensure minimum patch size is retained. Decaying wood ensures both resilience of dependent species and the replenishment of woodland soils' organic content and hence the capacity for moisture retention and provision of other essential ecological functions needed by trees and other species. Woodland edges and places where woodland grades into open scrub, sheltered glades and rides, and grassland are important for a range of wildlife species such as butterflies which use both the trees and shrubs and the grasses and flowering plants found in more open areas.

Capping - Parameter Plan

For the above reasons, some tree planting within the detailed application areas would be provided 'early' and thereafter relied on to offset anticipated losses in outline areas. There are sound arboricultural reasons to do this, and the result will be earlier provision of benefits to offset later losses that may or may not materialise. The later adverse effects (tree removal) are effectively 'capped' by the Parameter Plan, and may decrease, but could not increase.

AIA, 4.18, p32

This is not true. Page 27 of the AIA document, Section 3.38, says *"The proposed development may result in an increased likelihood of applications to prune or remove trees within the Conservation Area in the future. This would likely be a result of maintaining the required clearance of retained trees overhanging the South Stand car park."*

Biodiversity Net Gain and Arboriculture (BNG)

“It does not change existing legal protections for important habitats and wildlife species. It maintains the mitigation hierarchy of avoid impacts first, then mitigate and only compensate as a last resort.”

Local Government Association Biodiversity Net Gain - Key Components

People are intimately connected with nature and can suffer or benefit from BNG. For example people at a development site could lose a public park and could live too far from the biodiversity offset to benefit. Net gain is not possible if irreplaceable habitats are impacted. More than 50% of stakeholders mentioned social justice when asked about biodiversity offsetting as a conservation tool for England.

BNG is a relatively new principle and the short comings are yet to be fully identified.

Institute of Environmental Management and Assessment (IEMA)

Central government advises using BNG as a last resort. The BNG system often does not account for many aspects. It cannot measure special attributes relating to specific sites and cannot recreate the diverse structure of the biotic life in EWR.

Considerable soil deposit produced by organic matter from on-site fallen flora and from other organic matter is evident across the whole of EWR. Diverse biotic life (trees of numerous types, grasses, flowers, scrub and shrubs - all of which add to the trophic cycle of various other on-site living beings as well as contributing toward the non-living organic aspects) is evidence of a self-contained biological material cycle and trophic system. *i.e.* EWR is a community of biotic, living and dead ‘objects’ which sustains itself. Therefore, the site is not only an ecosystem unit in of itself, but also (due to its trophic interactions with the reservoir and water system) is part of an ecosystem unit covering a wider area. EWR can be classed as an ecosystem because it has produced itself and continues to do so while also enrichening the ecological value of the reservoir.

Recommended Measures

The following table gives a summary of the consequences for arboriculture of granting outline planning permission in accordance with this report. It assesses the net effect on each of the receptors identified in Section 2.0, including any proposed mitigation measures that are described in Section 4.0.

AIA, 4.44, p35

Receptor	Known Effects	In-principle Effects
Tree Canopy Cover	Positive	Positive
Conservation Area	Neutral	Neutral
Community Forest	Positive	Positive
Deciduous Woodland	Neutral	Negative
Hedgerows	Positive	Positive

Table 8 : Net effects of the proposed development, p35, AIA

Receptor Known Effects

In Principle effects are only because it isn't happening now! Removal of a minimum (remember we don't know how much) of 3,083m² canopy including young, semi mature and mature trees in a woodland in Alexandra Park Conservation Area to be replaced by saplings does **not** constitute **positive, known** and **in-principle effects** on Tree Canopy cover, Community Forest and neutral for Conservation Area. The only true statement is that there will be negative in principal effects on Deciduous Woodland.

Overall Balance

Known effects and in-principle effects on arboriculture can be mitigated and/or offset within the site in accordance with the recommendations of this report. The offsetting of in-principle effects should be detailed within a future reserved matters application.

AIA, 4.47, p35

The detailed application area landscaping/tree provision plan should be conditioned/sought by the council to underpin all the policy and strategies referenced as well as safeguarding the woodland.

6. Summary

EWR constitutes a **Woodland**, as defined by central government (Gov.uk Woodland definition), which provides ecosystem services - life-sustaining benefits we receive from nature. Removal of this deciduous woodland would **contradict a number of national and Stockport council policies and guidelines** intended to protect trees, nature and biodiversity. Woodlands are Habitats of Principal Importance.

This includes contradiction of **council planning policy to protect trees**, including the **Core Strategy Policy CS8 Safeguarding and Improving the Environment Part A – Protecting the Natural Environment**, as well as the **National Planning Policy Framework (NPPF)** and **Natural Environment and Rural Acts (NERA)**.

These policies embed protecting and enhancing the natural environment, improving biodiversity, and adapting to climate change in decision making.

Stockport MBC Core Strategy Policy states 'Development proposals affecting trees, woodland and other vegetation which make a positive contribution to amenity should make **provision for the retention of the vegetation** unless there is **justification** for felling, topping or lopping to enable the development to take place'.

NERA states 'All public authorities, including local planning authorities and statutory undertakers have a duty to have regard to the purpose of conserving biodiversity. In the context of planning, adverse effects on Habitats of Principal Importance that cannot be mitigated are material to decision making'

NPPF states 'Existing trees should be retained wherever possible. Where significant harm to biodiversity cannot be avoided, mitigated, or compensation provided, planning permission should be refused. Loss or fragmentation of trees and woodland may constitute or give rise to significant harm to biodiversity.'

The creation of the car park and the destruction of this deciduous woodland **will cause significant harm to biodiversity**. The loss of mature tree canopy, woodland floor and other ecological elements would be devastating to the wildlife that relies on it for survival. EWR is unique in its ability to sustain wildlife to a meaningful degree due to the lack of human footfall and disturbance. It holds future possibilities for use by community keyholders where benefits have been identified by health professionals. In terms of local importance, EWR should be recognised as a habitat worth protecting. It is also an important link between outlying habitats to the south and the reservoirs, being situated within a green corridor.

The loss of this woodland **cannot be mitigated by the proposed landscaping plans presented by the club**. The planting scheme proposed for woodland mitigation purposes comprises a linear section, tree pits and woodland enhancement. Combined, they **represent a significantly smaller area** (886m² vs 4,352m² - a difference of 3,466m²) which would not meet the area criterion to be classed as Woodland; **would be fragmented and divided by houses and asphalt**; and would **entirely fail to provide the diverse habitats found in mature woodland**. The Arboriculture Impact Assessment, provided in support of the application, details that the effect on the woodland would be **negative**. Tree felling within the woodland equates to a minimum of 2,525m² canopy removal of mostly middle aged/mature trees in good condition with a long-estimated contribution. Mitigation proposals detail planting 8 trees in the remaining area of woodland. Overall canopy mitigation is based on 1 sapling providing 41m² of canopy over a 30-year period.

In addition, the proposed development **will increase the urban heat island effect**, which the existing woodland currently counters, contradicting Core Strategy Policy SD-6 – Adapting to the Impacts of Climate Change.

The proposed new car park to be created by removing the woodland will also be **visible from the Alexandra Park Conservation Area** via Moscow Rd East and the reservoirs. The current woodland view including high level tree canopy beyond the retained section would be lost. This will **contradict Stockport Council's commitment to protect trees** in and surrounding conservation areas in **order to preserve the character or appearance of a conservation area** (UDP Policy HC1.1 – Demolition and Tree Felling in Conservation Areas).

We have a **number of concerns about the Arboricultural Impact Assessment (AIA)**. They include the provision of insufficient detail on the number, size and type of trees that would or could be felled. This is primarily due to the methodology undertaken by the assessor in Grouping trees rather than detailing individual Trees. For instance, a proportion of Group 7 trees will be felled. This Group contains trees that vary from 13 feet to 42 feet high, decision makers and the community cannot know which trees are at risk.

As a result, **granting outline planning permission would establish the principle that it is acceptable for the felling of unidentified and unspecified trees in a Woodland designated as Public Open Space within Alexandra Park Conservation Area.**

The loss of this woodland **is also entirely unnecessary since parking requirements can be catered for in an alternative way** (see *EWRG Objection Document, Part 7: Alternatives*) - for example, provision of a **two-tiered car park** on the other planned parking area. Instead, the Council has **an opportunity to protect and enhance this woodland as green infrastructure**, in line with its Core Strategy Policy CS8. Safeguarding the existing woodland would meet the aim of Protecting the Natural Environment and provide **the opportunity to recognise and increase its amenity value to the local community.**

We request Stockport Council **consider its commitment to nature and biodiversity** and **reject this application** in its current form.

APPENDIX A

Photographic evidence of trees and vegetation to be removed visible from the street within the Conservation Area (view beyond shaded areas are flora to be replaced by car park):

These images were taken in early summer. In autumn and winter the whole area of the site planned to be felled is fully visible.

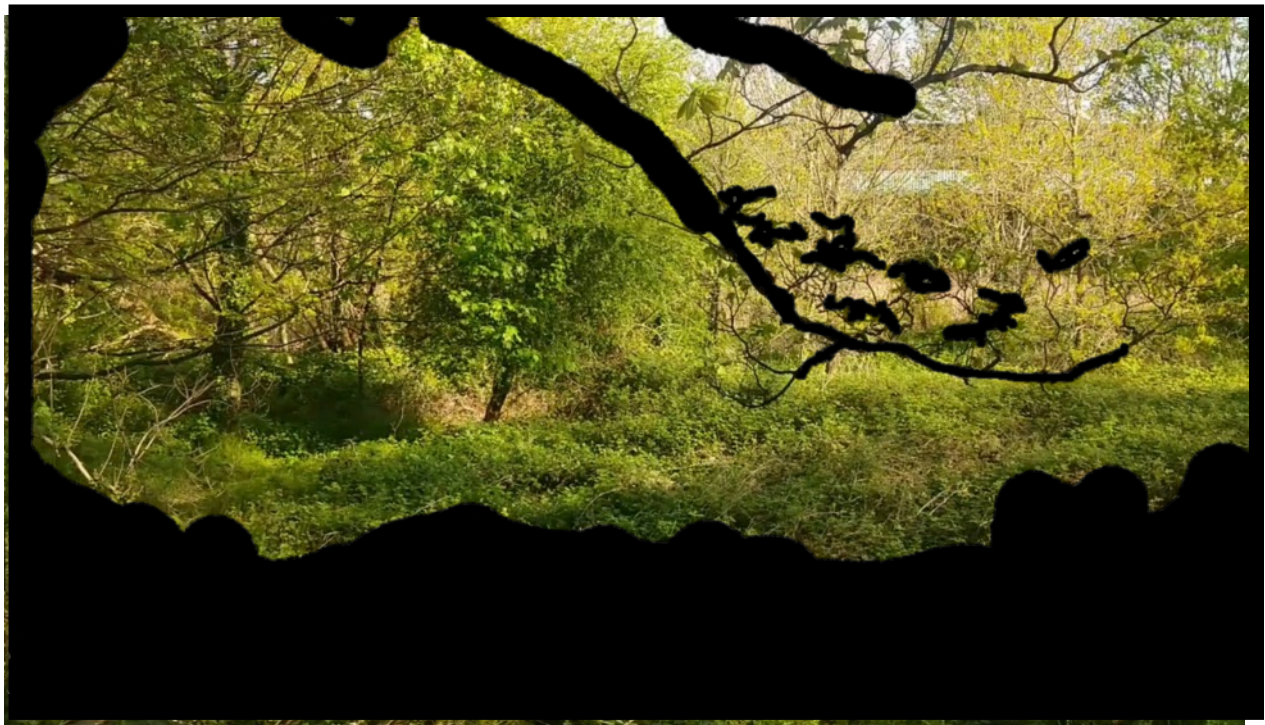




Note: According to the developers in a meeting with us, the large willow on the left may also be under threat of felling due to it existing at the envisaged pedestrian entry/exit point and posing a danger.











Note: According to the developers in a meeting with us, the large willow on the right may also be under threat of felling due to it existing at the envisaged pedestrian entry/exit point and posing a danger.





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