

Edgeley Wildlife Reserve Group

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**Date:** 26<sup>th</sup> June 2025

**To:**

Planning and Highways Regulation Committee  
Stockport Metropolitan Borough Council  
Town Hall, Edward Street,  
Stockport, SK1 3XE

Cllr Steve Gribbon (Chair), Cllr Rachel Wise (Vice-Chair), Cllr Asa Caton, Cllr Anna Charles-Jones, Cllr Will Dawson, Cllr Dean Fitzpatrick, Cllr Sue Glithero, Cllr Graham Greenhalgh, Cllr Ian Hunter, Cllr Mike Newman, Cllr Karl Wardlaw, Cllr Suzanne Wyatt, Caleb Harris (Secretary).

**Subject:** Urgent Request for Reconsideration: Planning Application DC/092211 – Car Park and Access on Edgeley Wildlife Reserve

**Dear Planning and Highways Regulation Committee,**

We, the Edgeley Wildlife Reserve Group (EWRG), urgently seek the Committee's consideration regarding the outline element of Planning Application DC/092211, a hybrid application scheduled for decision by Stockport Metropolitan Borough Council (SMBC) on 3rd July 2025, which proposes converting Edgeley Wildlife Reserve (EWR), a 5,806 m<sup>2</sup> woodland within the Alexandra Park Conservation Area, into a car park for Stockport County Football Club's stadium expansion, with associated access from Moscow Road East. While we fully support the stadium's redevelopment to benefit our community, we strongly object to the car park and access components, which contradict six key policies:

CS8 - Safeguarding and Improving the Environment

UOS 1.3 - Protection of Local Open Space

NE 3.1 - Protection and Enhancement of Green Chains

NPPF 103 & 104

NPPF 193 (a)

NPPF 208 & 209

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It is our opinion that SMBC has undervalued EWR's irreplaceable role as Edgeley's only significant *Natural* Greenspace, denying equitable access to nature for disadvantaged groups, children, vulnerable people, and marginalised groups and threatening the adjacent Sykes reservoir's aquatic ecosystem. We request the Committee's support in rejecting this application to protect EWR.

### Ecological and Biodiversity Concerns

Edgeley Wildlife Reserve (EWR), a rewilded deciduous woodland, constitutes a Habitat of Principal Importance, is the largest and only *natural* green space of meaningful size in Edgeley, constituting 40% of the ward's natural green space/wildlife habitat (1.4 acres of 3.57 acres in total). 89% of its trees were classified as of Moderate to High quality in the Arboricultural Impact Assessment supplied in support of the application. It is located within the Green Chain and supports 26 bird species, of which six are Red-listed and five are Amber-listed, meaning 42% of its birds are threatened, underscoring its critical role in supporting declining UK species. Additionally, EWR hosts 150 trees, of which 77 are mature or established, and 50 wild flora species—a diversity unlikely matched elsewhere in the ward. This floral richness supports pollinators and wildlife, underpinning ecological resilience in an area severely lacking such habitats. The developers disingenuously claim to enhance biodiversity by proposing tree pits in the car park, hedgerows, and small, fragmented patches of so-called "woodland" that fail to meet Forestry Commission standards for woodland classification (e.g., minimum 0.5 ha). These piecemeal mitigation measures, divided by hard standing, houses, footpaths, vehicle parking, and subject to heavy footfall, are ecologically inadequate, offering no functional replacement for EWR's cohesive habitat.

The Greater Manchester Ecology Unit (GMEU) emphasizes EWR's local significance, noting its "future potential as a woodland". The applicant's mitigation plans cannot compensate for the loss of this irreplaceable habitat, particularly its connected mosaic habitat of woodland, grassland, and scrub. The Environment Act 2021 (Section 90A) mandates public authorities to conserve and enhance biodiversity. Approving this car park would contradict this duty, the UK's commitments under the Convention on Biological Diversity Articles 6(b), 8(a), and 14(a), and the Edinburgh Declaration signed by Greater Manchester Combined Authority in 2022. EWR meets all nine criteria for designation as a Local Wildlife Site with the potential of delivering lasting ecological and community benefits in an area uniquely deprived of such natural spaces.

### Conservation Area Contraventions

EWR lies within the Alexandra Park Conservation Area, protected under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which mandates the Council to pay special attention to preserving or enhancing the area's character and appearance. Converting EWR into a car park, with proposed access from Moscow Road East for construction purposes, would remove its woodland, trees, and natural vistas, harming the Conservation Area's heritage value. Furthermore, Moscow Road East and surrounding streets feature historic cobbled paving stones, an integral part of the Conservation Area's heritage status. EWR's trees are protected under Section 211 of the Town and Country Planning Act 1990, requiring prior notification and the Council's approval for any tree work, equivalent to a Tree Preservation Order. The Council's failure to conduct a Conservation Area Appraisal, as

required to assess impacts, and its ambiguous treatment of EWR's Open Space designation demonstrate procedural flaws. Approving the car park and access would breach the Council's statutory duties under the 1990 Act and NPPF, risking legal challenges and setting a precedent for undermining Conservation Areas.

### Flood Risk and Ecosystem Services

Edgeley's high water table exacerbates persistent flooding in houses on adjacent streets, and EWR, as the ward's only substantial natural green space, delivers critical ecosystem gains by absorbing 3,173 m<sup>3</sup> of rainfall annually through its trees, scrub, and diverse flora like Bramble and Sedge Grasses. This natural drainage significantly reduces flood risks to nearby homes, the Sykes reservoir, and the River Mersey, providing an estimated £75,000 annually in ecosystem services, including carbon sequestration (£128/year), air quality improvement (£7,300/year), and flood mitigation. Converting EWR into a car park would result in the permanent loss of these services, incurring an annual £75,000 economic deficit and exposing the Council, as landowner leasing the site to the football club, to substantial liabilities. The applicant's proposed 1,100 m<sup>3</sup> underground tanks lack robust, transparent calculations to address localized flooding on streets like Moscow Road East and Dale Street. The Edgeley Park Angling Club has raised serious concerns about runoff and potential chemical contamination from construction phase and old tanks harming fish and aquatic life in the Sykes reservoir, a vital local ecosystem relied upon by the community. The Council's apparent acceptance of these proposals would be ignoring evidence of similar tank failures in Stockport, such as severe flooding at a Portwood car park. The heightened risk of flooding to nearby homes' cellars and the Sykes reservoir's aquatic biodiversity could lead to remediation costs, legal challenges, and compensatory biodiversity measures estimated at £500,000–£1,500,000, based on UK environmental precedents. Under the Environment Act 2021 (Section 90A) and NPPF Paragraph 180(e), the Council has a duty to prevent development that increases flood risk or degrades environmental assets, including aquatic ecosystems, per CBD Article 14(a). As landowner, the Council risks significant financial burdens from flood damages and contamination cleanup, which could be avoided by retaining EWR's natural flood mitigation and biodiversity value, aligning with the Council's fiscal and environmental responsibilities.

### Community and Health Impacts

Edgeley's deprivation and lack of *Natural* Greenspaces make EWR's role as the ward's only significant natural habitat vital for improving mental and physical health and equitable access to nature. Despite its designation as Open Space, EWR has been inaccessible since its lease to the football club. This violates CBD Articles 8(j) and 10(c), which mandate equitable access to biodiversity-rich spaces for cultural, health, and community benefits, especially for disadvantaged groups—children, vulnerable and disabled people, and marginalised groups—in Edgeley's deprived urban context. EWR's retention as a potential gated urban nature reserve would ensure such access, supported by stakeholders whom have already expressed an interest and eight local primary schools. These groups envision a natural enhancement of the space and introduction of inclusive activities like nature walks, educational programs, and community events, fostering social cohesion and reducing inequalities, per the 25 Year Environment Plan (Chapter 3, Section 3.1) and NPPF Paragraph 103. Focus on economic benefits from stadium redevelopment ignores these community benefits, which could attract funding from bodies

such as the Greater Manchester Environment Fund, National Lottery Heritage Fund, and Manchester Airport Community Fund. A car park offers no such benefits and may increase noise, pollution, and social isolation, further disadvantaging vulnerable groups.

### Open Space Policy

Edgeley Wildlife Reserve sits within Central (Stockport) Area and is designated in the UDP as Local Open Space and Green Chain. The policy advises:

Within areas of Local Open Space development will not be permitted unless:

- (i) It is clearly needed in connection with the outdoor recreational use of the land or is otherwise appropriate to the maintenance of the open nature of the land, and it would clearly enhance the overall quality of Local Open Space provision in the area; or
- (ii) It can be demonstrated that there is an adequate provision of open space in the local area and that the loss of the site would not be detrimental to the well-being of the local community or the amenities of the area; or
- (iii) The open space that would be lost as a result of the proposed development would be replaced by open space of equivalent or better quantity, quality, usefulness, and attractiveness, in a location at least as accessible to current and potential users.

### UDP UOS1.3 PROTECTION OF LOCAL OPEN SPACE POLICY

Stockport Council's Open Space Assessment Report (2017) classifies the land at Edgeley Wildlife Reserve (EWR) as "Parks and Gardens" based on its primary open space purpose. However, this classification is inconsistent with the site's characteristics and the Council's own typology. Parks and Gardens (Part 4) includes urban parks, country parks, and formal gardens designed for informal recreation and community events. In contrast, Natural and Semi-Natural Greenspace (Part 5) encompasses woodlands, scrub, grasslands, wetlands, wastelands, and other habitats that support wildlife conservation, biodiversity, and environmental education. EWR, which includes woodland, grassland, and scrub habitats that support wildlife conservation, biodiversity, and opportunities for environmental education, clearly aligns with the Natural and Semi-Natural Greenspace typology. The Council accepted the developer's rationale for developing EWR under section (ii), citing sufficient provision of Parks and Gardens in the Central Area based on the Fields in Trust (FIT) standard population ratio. While it does have a sufficient supply of Parks and Gardens, data from the Open Space Assessment highlights that the Central Area has the greatest deficiency of *Natural* and Semi-Natural Greenspace in the entire Stockport Borough. EWR looks to have been grouped with Edgeley Park, a maintained urban park, which entirely misrepresents its character. The Council planning officer's own report further rigorously contradicts the notion that EWR is a Park or Garden designed for informal recreation or community events. EWR should be reclassified as *Natural* and Semi-Natural Greenspace. This correction would reflect the site's true nature and underscore the critical deficiency of such spaces in the Central Area, as evidenced by the Council's own data.

## Alternatives and Sustainable Development

The applicant's justification for a car park on EWR is unjustified, as their plans to redesign the stadium's stands, including a new South Stand bordering EWR which could be accessible from both east and west, provide 7,870 m<sup>2</sup> of hard surface for parking space, sufficient to meet parking needs and English Football League (EFL) guidelines for media compounds, which typically require minimal space for broadcast vehicles and equipment. The Council's Adopted Parking Standards impose no minimum parking requirement for stadia, and modern examples like Tottenham Hotspur (1 space per 197 seats), Everton (no dedicated parking), and Real Madrid (in Spain) show that stadia can operate effectively with limited parking by prioritising sustainable transport. Nearby transport hubs, including Stockport railway station and bus routes, further support match-day access without encroaching on EWR. Active Travel England said that they expect something more significant than a 7% improvement in sustainable travel—in remarks about the application's travel plans. Alternatives, such as optimising the 7,870 m<sup>2</sup> provided in a redesign through efficient layout, ensuring east and west access to the South Stand for seamless supporter flow, or introducing shuttle services from underutilized lots, could fully satisfy EFL requirements while preserving EWR's ecological richness, including its unique flora and critical flood mitigation capacity, allowing the local community to unlock its ecoservice benefits. These solutions align with the Council's commitment to net-zero emissions and sustainable urban planning, rendering the destruction of Edgeley's only significant natural green space unnecessary and contrary to national environmental priorities.

We have provided evidence to show how retention of the woodland meets numerous national, regional (GMCA), and local council (SMBC) policies and strategies. Furthermore, we have evidenced how the woodland can be preserved whilst still allowing viable economic development of the football club.

### **Request for Action**

We respectfully urge the Planning and Highways Regulation Committee to:

Request the developers to architecturally re-design the outline element of Planning Application DC/092211, which conflicts with the key policies listed on page 1 of this letter and the attached list of applicable legislation, policies, guidelines, and commitments, while noting our support for the stadium's redevelopment excluding the car park (and related access) on EWR, which denies equitable community access, threatens the Sykes reservoir's aquatic ecosystem, and harms biodiversity.

Conduct further ecological surveys, including aquatic impact assessments for the Sykes reservoir, and a Conservation Area Appraisal, as recommended by GMEU, before any decision on the car park and access.

Endorse EWR's designation as a Local Wildlife Site or Nature Reserve, recognizing its compliance with government criteria, its unique ecological and community value for equitable access, and its potential to attract funding for health and nature-based initiatives in a ward lacking comparable habitats.

Scrutinize the methodology utilised in the Arboricultural Impact Assessment Report.

Scrutinize the Council's compliance with the Environment Act 2021, CBD, and flood risk duties, ensuring procedural flaws (e.g., unverified flood mitigation, Open Space sub-categorization (Parks & Gardens versus Natural Green Spaces), and Conservation Area impacts) are addressed in the car park and related access proposal.

The loss of EWR, Edgeley's only significant natural green space, would set a harmful precedent, undermining the Council's commitment to halt species decline, enhance species abundance, and ensure equitable access to nature. Its retention as a nature reserve would enhance Edgeley's ecological, social, and economic resilience. We have submitted detailed objections to the Council (available at [www.edgeleywildlifereserve.com](http://www.edgeleywildlifereserve.com)).

Yours sincerely,

**Edgeley Wildlife Reserve Group**

[www.edgeleywildlifereserve.com](http://www.edgeleywildlifereserve.com)

Cc:

DEFRA

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Planning Department, Stockport Metropolitan Borough Council ([planning.dc@stockport.gov.uk](mailto:planning.dc@stockport.gov.uk))

Documents attached with this letter:

EWR - APPENDIX - SOS - LEGISLATION - FINAL - 250625

EWR - APPENDIX - SOS - SUMMARY FOR COMMITTEE - FINAL - 250625

EWR - APPENDIX - SOS - EWR&LNS CRITERIA - FINAL - 250625

EWR - APPENDIX - SOS - IMAGE 1 - 250625