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Date: 11<sup>th</sup> June 2025

**For Sitting Members of the Central Area Committee, SMBC**

**Ref: DC/092211**

**Dear Councillor,**

In regard to the Outline Part of Planning Application DC/092211 this letter forms part of our objection document and consists of a summary of the points raised in our objection document for the benefit of those councillors sat upon any committee discussing or making decisions relating to DC/092211.

This document raises points which we feel the council should be considering when making decisions regarding the Outline Part of Planning Application DC/092211, specifically; the parcel of land we refer to as Edgeley Wildlife Reserve (hereby referred to as EWR). This is the land that the Outline Part of Planning Application DC/092211 has designated as car parking space as part of the south stand development.

We would also like to refer councillors and members of the council to our complete objection documents which have been provided to [planning.dc@stockport.gov.uk](mailto:planning.dc@stockport.gov.uk). They can also be read and downloaded from [www.edgeleywildlifereserve.com](http://www.edgeleywildlifereserve.com)

Kind Regards  
Edgeley Wildlife Reserve Group

## **1. Background**

This parcel of land (EWR) is situated south of the stadium and east of Sykes reservoir. The land is currently designated as Open (public) Space and was recently leased to Stockport County Football Club by the council. It is approximately 5,806m<sup>2</sup> in size and has been left to re-wild for a number of decades. During the majority of that time its eastern border consisted of a brick wall of approximately 5ft in height and its southern border (along Moscow Road East) consisted of an iron rail fence of similar height and in keeping with the iron rail fence consistent with the Alexandra Park Conservation Area of which it is part. At the eastern end of the southern border (at the corner of Moscow Road East and the public footpath) an access gate had remained open for at least twenty years.

Access to this public open space was only denied approximately 4 years ago when the adjacent footpath was widened. The brick wall (along with mature trees on the land) was removed and replaced with a 2m high mesh security fence along the eastern border with the footpath and part of the southern border (Moscow Road East) where a segment of iron rail fencing was replaced by a security fence and a new gate which denied access to the designated Open Space. (Note: these changes to access occurred prior to the current lease agreement or development plans (DC/092211) being submitted.)

Edgeley is an area deprived of natural green space. Having rewilded for fifty-years this land constitutes the largest single area of natural green space in the ward. As a result, a community idea was conceived to work toward developing the land into an urban nature reserve which would give access to local community groups and school children. A preliminary communication was made to Conservation Officer Paul Hartley about this. This idea was conceived and the initial communication to the council made prior to the widening of the footpath and changes to fencing and access, prior to the lease of the land to the football club (the community/neighbourhood was not informed of this) and prior to the submission of the current Planning Application DC/092211 and/or the related preceding scoping process.

Though not situated on a flood plain, the area the land is situated upon (including parallel streets, homes and roads nearby) suffer from flooding due to the high water table. The portion of land referred to is also situated wholly within the council designated Alexandra Park Conservation Area.

The application to remove Edgeley's largest area of natural habitat to replace it with a car park comes at a time where a Climate Emergency *and* a Biodiversity Emergency have been declared and recognised by Greater Manchester Combined Authority. Britain (particularly England) has been officially ranked as one of the worst countries globally in terms of habitat loss - wildlife species and wildlife abundance are both suffering. The Climate Emergency and the Biodiversity Emergency, though connected, are separate issues and Stockport is not immune to either of them.

As stated by Greater Manchester Ecological Unit, Stockport County FC has been at this location for over a century and not needed this car parking historically. Future success of the club is unknown, not necessarily permanent and subject to negative (sometimes very negative) change. A study of historical attendance records show trends which do not necessarily justify an increase of capacity to the degree planned. Many members of the local community also have interests other than football. While it is widely acknowledged that the football club do many things for the community, members of the Edgeley community may also have misgivings about Edgeley becoming wholly synonymous with football. Edgeley also currently suffers from a lack of parking, particularly on match days. With such an increase of capacity, induced traffic is a concern which cannot be satisfied by any number of new car parks.

The following sections are points that the council should consider before granting permission for the Outline Part of this Planning Application.

## **2. Impact on Ecology, Biodiversity & Environment**

When considering this planning application in terms of ecology, councillors making decisions should be aware of the following:

Edgeley ward now consists of approximately 571 acres. Of those 571 acres, as things are, only 3.57 acres are capable of providing secure and safe space to wildlife in areas of any meaningful size. In percentage, that means that 99.3% of the surface area of Edgeley is incapable of supporting wildlife habitat to any consistent, self sustainable or meaningful degree. In terms of areas of meaningful size, this parcel of land, Edgeley Wildlife Reserve, constitutes around 40% of all of what can be considered Edgeley district's wildlife habitat.

Councillors and decision makers should be aware of the difference between Green Space and Natural Green Space (wildlife habitat) before making a decision on this application. Councillors and decision makers should also be aware of the difference between Climate Emergency and Biodiversity Emergency. *i.e.* Mitigation for (carbon, CO<sup>2</sup>, oxygen and air quality levels) and mitigation for natural green space (wildlife habitat).

Councillors making decisions should be aware that the government uses the Forestry Commission's definition of the classification of Woodland. As it is today, Edgeley Wildlife Reserve fits that classification; *i.e.* EWR is a woodland. Woodlands are designated as 'habitats of principal importance'.

Councillors making decisions should be aware that the applicant refers to certain elements of mitigation planting as 'woodland creation'. Due to space, the club's mitigation plans do not, nor cannot 'create' woodland (pursuant to government guidelines) on-site. It is also somewhat disingenuous to claim that:

A) what amounts to a wide hedgerow in area can not only mitigate for the loss of existing woodland but improve it's biodiversity value by a percentage figure and/or that tree pits amid hard standing ground subject to heavy footfall should be considered compensation for wildlife habitat.

B) that wide hedgerows situated between footpaths, industrial units and hard standing areas subject to heavy footfall, can replace the value to wildlife of existing single areas of enclosed habitat comprising of grasses, scrub and actual woodland.

The applicant's current mitigation plans cannot account for the loss of existing local wildlife habitat areas with piecemeal and fragmented mitigation plans such as those provided with this application. As a consultant to the council on such matters, Greater Manchester Ecology Unit have made the following statement:

"more weight than would normally be given for a woodland of this nature should be applied given the lack of such habitat and the site's future potential as a woodland. I would recommend that a review of the need for so much woodland should be provided prior to determination. Stockport County FC has been at this location for over a century and not needed this car parking historically, therefore in my opinion it is reasonable to request additional justification on why this locally important habitat cannot be avoided."

**Email from GMEU to Planning.DC**

Air and water quality are key elements for decision makers to consider in regard to the outline part of the application to build a car park upon EWR but the Biodiversity Emergency requires its own habitat driven measures. In local terms, in respect to biodiversity; as well as categorizing areas of a single site in terms of good, moderate and poor, ecologists should also be dutifully and professionally bound to qualify any site's baseline condition based upon a rank in respect to its local significance. The ecology reports provided by the developers in the case of the outline part of these plans fails to do that. If they did, as far as Edgeley is concerned, they would realise this parcel of land (whatever the quality of its parts) ranks, sadly, as the most significant wildlife habitat in the Edgeley ward. Thus, as far as Edgeley is concerned and in net terms, is the best chance local British wildlife has.

## Legally Binding Commitments

Councillors and decision makers should be aware that in the absence of a published Local Nature Recovery Strategy, National Government guidelines require Stockport to refer to the Local Nature Recovery Strategy implemented by Greater Manchester Combined Authority.

Councillors and decision makers should be aware that Greater Manchester Combined Authority (of which Stockport is part) recognised the Biodiversity Emergency and signed the Edinburgh Declaration (a UN-backed statement of intent committing to restore nature and reverse habitat loss) in 2022. The Edinburgh Declaration argues for greater prominence to be given to the role of cities and local authorities in delivering the changes required. Greater Manchester Combined Authority has recognised: **Avoiding and minimising** impacts upon wildlife habitat (especially where alternatives to planned developments can be effected) are options which local authorities within Greater Manchester are obliged to consider, and should, really, if they want to make any difference at all, be leaning toward.

The Environment Act 2021 includes legally binding targets for the government that will help the UK to meet its international commitments. These targets are discussed in terms of the National Planning Policy Framework and the Convention for Biological Diversity. Also discussed are national strategies and strategies which local government are obliged to implement. A reading of these strategies, policies and commitments should enable decision makers to make the correct decision on the fate of Edgeley Wildlife Reserve. That decision will impact directly upon our local and ultimately our national wildlife as well as the Edgeley community in regard to the benefits of access to Edgeley's only true natural space of any significance. A full description of these targets and their relevance to Edgeley has been provided to SMBC (See document: EWR-OD-Part 3-Ecology & Biodiversity).

The Environment Act 2021, dictates that :

“public authority which has any functions exercisable in relation to England must from time to time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the **conservation** and **enhancement** of biodiversity in England. **After that** consideration the authority must (unless it concludes there is no new action it can properly take), determine such policies and specific objectives as it considers appropriate for taking action to **further** conservation and enhancement of biodiversity in England and take such action as it considers appropriate, in the light of those policies and objectives, to further that objective.”

### **The Environment Act**

It should be understood by decision makers that *mitigation and compensation* are **not** the same thing as *protection, restoration and enhancement*. Stockport County Football Club's current outline plans in regard to mitigation and compensation do not benefit *protection, restoration or enhancement* of *existing* wildlife habitat. According to Greater Manchester Ecological Unit (consultant body to SMBC), the club's plans fall far short of achieving acceptable on-site mitigation calculations, let alone exceeding them as the plans claim.

Councillors and decision makers should be aware that National Government has outlined guidelines for identifying and designating local nature sites. Edgeley Wildlife Reserve meets **ALL** nine of the required attributes. A more detailed description has been provided to SMBC (See document: EWR-OD-Part 3-Ecology & Biodiversity-App 2-LNS). National planning policy **expects** plans from local authorities to identify and map these sites, and to include policies that not only **secure their protection from harm or loss but also help to enhance them** and their connection to wider ecological networks. See <https://www.gov.uk/guidance/natural-environment>, Paragraph: **013**  
**Reference ID: 8-013-20190721**

Councillors and decision makers should be aware that areas have been added to the GMBAP plan because they are considered to be of conservation concern **locally** within Greater Manchester. Being the only area in Edgeley capable of securely sustaining wildlife to any meaningful degree, EWR is certainly an area which

is of conservation concern locally. EWR should have been entered into the GMBAP and/or The Local Nature Recovery Strategy in order to contribute to the recovery of Britain's wildlife and the conservation of wildlife habitat. The ecological value of EWR should certainly not have been scoped out at the pre-application stage of this hybrid planning application. Based upon its ranking according to the number and quality of the range of natural wildlife habitat sites/areas in the locality it should also be registered into relevant strategies concerned with local community access to natural greenspaces for purposes of health and well being. Stockport and its districts should already be making a count of suitable wildlife habitat.

The new Labour government has set **nature recovery as one of the five priorities** for the Department for Environment, Food and Rural Affairs (Defra). It has also stated that it intends to **honour international agreements on biodiversity** (i.e. the CBD) and that it will update the current Environmental Improvement Plan. The CBD called for the development and enforcement of national strategies and associated action plans to **identify, conserve and protect existing** biological diversity, and to enhance it wherever possible. Councillors and decision makers should therefore be aware of and familiar with the targets set by government pursuant to the Convention of Biological Diversity before granting permission for the Outline part of this planning application.

Government has prioritized calling for and implementing policies to deliver **bigger** wildlife habitats, increase the size of remaining areas of priority habitat where appropriate; **more** areas of priority habitat; and joining habitats by enhancing ecological connections and increasing opportunity for wildlife to move around the landscape by making use of 'stepping stones', 'corridors' and other features. EWR is indeed an area which is viable for consideration by local government as an area of natural habitat potential in regard to its ecological value in its own right. As well as perfectly meeting legally binding targets and commitments set by the CBD, on a local level; EWR can meet the aim of the Biodiversity 2020 strategy by protecting, restoring and enhancing habitat in ways that can contribute to the strategic plans and ambitions the government are implementing.

When involved with development plans and decisions SMBC should consider it's biodiversity duty when complying with requirements relating to strategic environmental assessments, environmental impact assessments and habitats regulations assessments. In the case of the outline part of the planning application (Ref: # DC/092211 ) at pre-application phase, SMBC did not consider strategic or environmental impact assessments thoroughly enough, scoping out important aspects which clearly should not have been scoped out.

*"Although no detailed ecological information has been submitted yet to the LPA in relation to the proposed development, when considering what information is available (and discussions during pre-app meetings) along with the criteria set out in Schedule 2 developments, significant ecological impacts associated with the proposed scheme following implementation of best practice mitigation measures and BNG offsetting would be considered unlikely."*

**Subject: DC091614 EIA Scoping Opinion Request (Ecology Dept to Planning Dept)**

Before making a decision on this planning application councillors should be aware of the difference between species abundance and species diversity. The UK is taking the decline of species abundance seriously. The state of decline in UK species abundance is covered in more detail in section 3.0 of EWR-OD-Part 3-Ecology & Biodiversity (supplied to Planning Dept). The decline in abundance of our wildlife is accelerating. Numbers of birds alone are 43% less than they were 50 years ago. The number of birds has almost halved in FIFTY YEARS.

#### The Environment Act

Councillors and decision makers should be aware that The Environment Act Part 1 states:

*"The document entitled "A green future: our 25 year plan to improve the environment" published by Her Majesty's Government on 11 January 2018 is to be treated as an environmental improvement plan prepared by the Secretary of State under this section."*

#### The 25 Year Plan

We will conserve and enhance the beauty of our natural environment, and make sure it can be enjoyed, used by and cared for by everyone. We will do this by: Making sure that there are **high quality, accessible, natural spaces close to where people live and work, particularly in urban areas**, and encouraging more people to spend time in them to benefit their health and well being. Focusing on increasing action to improve the environment from all sectors of society.

**RN: 25yr PLAN , p28 / Pursuant to The Environment Act Part 1**

Thriving plants and wildlife already exist in EWR and there is scope (pursuant to legally binding commitments) to enhance it. Removing their home will devastate local ecology in EWR itself and will greatly effect the ecology of the neighbouring reservoirs. Locally, the life currently situated in EWR CANNOT be replaced. There is nowhere of equal size left in Edgeley to replace it. If there was, it would take thirty years to achieve anything remotely similar in regard to undergrowth and younger trees and upwards of fifty years to achieve anything similar in regard to maturer trees, microbial life, lichens, mosses, insect life and the combined system of their sum totals. Considering Britain's bird population has almost halved in fifty years, a thirty year wait to achieve habitat compensation would likely be devastating to species abundance locally.

All of these policies relate to EWR in one way or another. EWR is publicly owned land within a designated Conservation Area that can be used and managed sustainably. Designating EWR as an urban nature reserve will contribute to the recovery of nature and enhance the local area. The idea for a gated nature reserve upon EWR will connect people with the environment to improve health and wellbeing - see document EWR-OD-Part 4: *Community, Health & Education* (supplied to SMBC).

Britain's wildlife cannot begin to recover from it's shocking decline in abundance and 'thrive' where there is nowhere left to 'thrive'. Enhanced beauty and engagement with the natural environment cannot be established in Edgeley with the creation of a car park. Enhanced beauty can be established anywhere in Edgeley including EWR. As it stands, in Edgeley, engagement with anything resembling a natural environment of any reasonable scope can **only** be established in EWR.

Long-term action requires us to take **difficult choices**, some with considerable economic consequences, about conservation. In the past, our failure to understand the full value of the benefits offered by the environment and cultural heritage has seen us make poor choices. We can change that by using a **natural capital approach**. When we give the environment its due regard as a natural asset – indeed a key contributor – to the overall economy, we will be more likely to give it the value it deserves to protect and enhance it. This is why, as signalled in our Industrial Strategy, over coming years the UK intends to use 'natural capital' approach as a tool to help us make key choices and long-term decisions.

**RN, 25 yr plan, p19 / Pursuant to The Environment Act Part 1**

**Ecology and Biodiversity Full Objection Document**  
<https://www.edgeleywildlifereserve.com/saveewr.html>  
**Also supplied to Planning Department (SMBC)**



### 3. Bowland Ecology Report

The key findings of the Bowland Ecology Report make no detailed mention of the nature or quality of existing woodland to be lost, the importance of scrub (brambles) to wildlife and other flora such as saplings, or to the importance of the understory of the existing woodland to be lost (including soil). Most importantly, notwithstanding that bramble scrub has high ecological value, the report claims that compensation will be met through the creation of woodland on site (in areas of existing scrub).

A) Compensation - **A Woodland cannot be replaced on site!** EWRG Objection Document Appendix 1: *Arboricultural Assessment Response*. (Supplied to SMBC) explains the accepted definition of Woodland in the UK.

B) Enhancement - It is disambiguous to suggest that an existing natural environment, ecological habitat or an existing ecosystem can be **enhanced** after (or by) removing what constitutes elements of an existing woodland to leave what amounts to a relatively thin screen of trees or hedgerow. Additionally, the key findings pay no regard to what is already competitive space beneath the existing treeline to be 'retained' where canopy cover is already at a maximum.

C) Grassland & Hedgerow - Any 'compensating' grassland will be situated within or between developed areas and disconnected (*i.e.* not connected to anything that can be defined as Woodland according to government guidelines). The whole site and the wider area would lose overall and combined ecological value and wildlife would lose habitat security due to loss of an area of established woodland (incorporating integral grassland and scrub) for fragmented and piecemeal attempts to mitigate it. Key findings also fail to mention that the established woodland to be lost is the largest area of such habitat in Edgeley.

The key findings on habitat also overlook that :

A) hedgerows planted on site will also be situated as narrow relatively thin strips between developed areas of car parks, footpaths, buildings and areas of extremely heavy footfall (and in the case of the eastern border - where substantial undergrowth **already exists**). This cannot compensate wildlife for the loss of an established and secure woodland which itself has the potential to be enhanced.

B) many trees will be planted in pits or relatively small fragmented areas surrounded by development in car parks and public thoroughfares expected to service thousands of people. This cannot compensate wildlife for the loss of an established and secure woodland which itself has the potential to be enhanced.

The ideas of mitigation and compensation are negligible at best and the **notion of enhancement has no grounds to be considered** where the same enhancements can be made without removing existing woodland.

#### Designated Sites

3.1 of the Key Findings mentions two statutory, two non statutory [habitat] sites, and multiple Local Nature Recovery Strategy Areas within 2km of the planned development. 3.2 notes that species using these sites may utilise habitats present within EWR when commuting between designated sites. It doesn't explain how those species know a designated site from an intermediate undesignated site and assumes that no species migrate or expand to other sites or might do as non designated sites improve in nature - which is ignorant to the whole ethos of nature recovery. The context of nature recovery requires more sites and larger sites, not less, smaller or fragmented sites posing as enhanced sites. The identification, protection, conservation and enhancement of existing sites is paramount in legally binding guidelines and policies issued by UK government.

3.2 goes on to state that the proposed development is of a small scale nature and relates that to the security of those other sites referred to, claiming it will have no negative effects, but fails to identify, recognize or acknowledge that for EWR and the whole Edgeley district the scale of the planned development is huge and the negative impact on local ecology and habitat is irreparable virtue of EWR being the only sizeable area of woodland,

grassland and scrub habitat which can sustain (as an ecosystem) wildlife to any meaningful degree. The ecological value of EWR to the neighbouring gated reservoir area, divided only by a fence, is completely overlooked.

The key findings here do not allude to protection, conservation or recovery of wildlife but to a measured surrender of precious wildlife habitat in an area deprived of it. Contrary to the findings of the Bowland Ecological Report, EWR is richer in species than it reports. Any imagery utilized in the planning application documents also seem to be subjective - showing individual bare and weary looking trees in winter. Councillors and decision makers should be aware of contrasting imagery providing a more honest representation of EWR (supplied to SMBC) in document: EWR-OD-3B-VIS-FINAL-270724

Edgeley Wildlife Reserve Group believe decision makers are dutybound to visit the site (EWR) prior to any decision being made. We are also concerned that any site visit in winter may not satisfactorily provide representation of how rich and alive with nature EWR is in spring and summer.

A more detailed list of species (flora & fauna) recorded on site (not exhaustive) can also be provided and/or viewed at [www.edgeleywildlifereserve.com](http://www.edgeleywildlifereserve.com)



#### **4. Arboriculture**

EWR is a woodland. Woodlands are Habitats of Principal Importance. Removal of this woodland contradicts a number of national government and Stockport council policies and guidelines intended to protect trees, nature and biodiversity. They include: the Core Strategy Policy - CS8 Safeguarding and Improving the Environment, Part A – Protecting the Natural Environment; the National Planning Policy Framework (NPPF); and Natural Environment and Rural Acts (NERA).

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 south area car park and the destruction of this 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.

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 narrow linear section, tree pits and woodland enhancement. Combined, they represent a significantly smaller area (886m<sup>2</sup> vs 4,352m<sup>2</sup> - a difference of 3,466m<sup>2</sup>) which would not meet the area criterion to be classed as Woodland. It 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 2,525m<sup>2</sup> 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 41m<sup>2</sup> 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.

We have a number of concerns about the Arboricultural Impact Assessment (AIA). There is 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.

#### **Arboriculture Full Objection Document**

<https://www.edgeleywildlifereserve.com/saveewr.html>

**Also supplied to Planning Department (SMBC)**

## **5. Greater Manchester Ecology Unit - Remarks & Guidance**

GMEU have noted reservations regarding the thoroughness of the ecology report and requests clarifications:

“For the outline application if access has not occurred, then I would recommend that further survey occurs prior to determination.”

GMEU makes note of proximity of reservoir:

“There is therefore a risk of adverse effects to these water bodies as a result of the outline proposals, primarily from dust, sediment and pollutants.”

GMEU recognizes local importance of EWR woodland:

“...more weight than would normally be given for a woodland of this nature should be applied given the lack of such habitat and the sites future potential as a woodland. I would recommend that a review of the need for so much woodland should be provided prior to determination. Stockport County FC has been at this location for over a century and not needed this car parking historically, therefore in my opinion it is reasonable to request additional justification on why this locally important habitat cannot be avoided.”

GMEU recognizes that the plan’s BNG metrics are not sufficient:

“Metrics have been provided for both the full and outline applications. Both show a net loss as would be expected given the nature of the development. The full metric shows a shortfall of 1.41 BU to achieve 10% BNG and the outline a 1.54BU shortfall to achieve 10% BNG.”

GMEU makes suggestions regarding alternatives:

“...reduction in the area of car parking on outline stage in order to retain and enhance a larger area of the existing woodland. I therefore recommend that prior to determination the proposals are reviewed (for both full and outline applications) to try and reduce the losses on the site, in particular the woodland to the south and that more information is provided on the developers strategy to discharge the statutory biodiversity metric.”

## **6. Drainage**

The catchment area of the land in question (the wildlife reserve) today is approximately 5,806m<sup>2</sup>. Based upon average rainfall (not including snow and other precipitation) for Stockport (28.7 inches/pa) the volume of water absorbed by or otherwise running off the land is 4,239m<sup>3</sup> or 4,238,961 litres per year. The catchment area of the land in question (the wildlife reserve) to be developed is approximately 4,352m<sup>2</sup>. Based upon average rainfall (not including snow and other precipitation) for Stockport the volume of water absorbed by or otherwise running off the land is 3,173m<sup>3</sup> or 3,173,000 litres per year.

Development plans claim that underground tanks totalling a capacity of 1,100 m<sup>3</sup> (over 1,000,000 Litres) will suffice in mitigating for the absorption of water as a result of situating a car park on the land. The largest underground attenuation tank found online is 50,000 litres. That means that twenty of these tanks would be required. These tanks (existing underneath a car park) would have to be linked together with piping, pressure and measurement gauging 'devices'. The tanks, pipes and gauges, underneath the car park, would need to be easily accessible if something went wrong.

Already existing underground on site there are old tanks filled with spoil, covered with soil naturally accumulated over decades, and overgrown with vegetation (trees, grass, scrub). If the intent is to use the existing tanks they would need to be emptied of spoil. The tanks (and the spoil (1100m<sup>3</sup>)) are likely to contain hazardous waste due to residual chemicals in situ at time of emptying around a century ago. Chemical residue could pose a threat to the reservoirs and ultimately the River Mersey. The state of these tanks is unknown. The existing tanks would need to have their integrity checked, they would have to be cleaned and possibly/likely re-lined. The situation would remain whereby the tanks, pipes and gauges, underneath the car park, would need to be easily accessible if something went wrong.

It can be noted, although circumstances differ, that the car park renovation at Meadow Mill in Portwood used a similar tank system with the claim that they would add 30% improvement to drainage. The recent flooding there has shown that they made no difference at all.

## **7. Flood Risk**

The council should question why none of the following was established or deemed necessary to investigate during the scoping out phase prior to this application being submitted.

The area around the site already floods quite extensively due to high water table. The complexity of the relationship between the spring fed rivulet (referred to as a 'sewer' by Asteer), the neighbouring reservoir, the flooding of homes along Moscow Road East and the flooding of Dale Street needs to be fully understood and taken into account before planning permission is granted.

Asteer have seemingly dismissed the subject of the source of natural underground springs and the effect any changes might have on the local water table. Instead, they have only explained that the rivulet (which is residual to the spring(s)) is now combined with the rainwater run-off drainage system which they refer to as 'sewers'. These 'sewers' which drained only excess surface run-off prior to the new build houses at the north-eastern corner of the stadium area are connected with the reservoir system and ultimately the River Mersey.

Not only should the council be concerned with how such a water retention/release system will be feasibly prepared, installed and maintained without risk to the ecological integrity of the reservoir and thereafter the River Mersey but also with what effects any resulting changes to the land will have upon the flow of water between the land and the reservoir and upon the water table.

The council should be concerned with establishing correct calculations regarding claims that the use of underground tanks will avert flooding from excess runoff caused by the removal of roots to provide a hard-standing car park. The calculation should not only examine drainage lost by the removal of existing trees but also drainage lost by the removal of bramble and grasses.

The club plans to depend upon tanks which hold 1,100,000 litres to mitigate rainwater runoff that would otherwise have been absorbed by roots. There are well over 280 trees of varying ages and sizes in Edgeley Wildlife Reserve, along with scrub and grasses. EWRG counted 70+ trees of 6ft in height or more two years ago and there are also many smaller saplings.

On average, a tree between the height of 6ft and 12ft is expected to absorb 5-15 litres of water per day. Trees above 12ft in height can absorb up to 450 litres per day. Based upon trees of 6ft to 12ft in height and the mean figure of 10 litres per day for each tree we see that 70 trees will currently absorb 700 litres per day (255,500 litres per year). This calculation hugely underestimates the current level of absorption provided by the wildlife reserve. That is because of the 70 trees of at least 6ft in height in 2023 most will now be larger and many of them *were* already much larger in 2023 (some reaching 30ft plus in height) and because there are more than 70 trees. Neither does the calculation take into account fruit scrub and grasses in the equation of water absorption. Neither does this calculation account for ordinary existing amount of runoff not absorbed by roots but collected by the water table.

Still, using the lower figure of 700 litres a day (to account for those trees retained) we can see that within a maximum of four years (likely half that) the tanks holding the equivalent of 3,013 litres per day would be hypothetically full if not emptied. This means that the club is going to be forced to pump water (as explained in the literature they provide) into the reservoir and the rivulet that wouldn't ordinarily have reached the rivulet/reservoir at a rate exceeding the current rate. The reservoir sluice gates will return the water to the rivulet which might contribute to the notorious flooding on Dale Street and any water pumped into the eastern 'planted' area not absorbed by flora that will take thirty years to reach the maturity of existing foliage will either; a) also join the rivulet/reservoir, or, b) flow into the roadside drains.

In regard to tank fed irrigation plans it seems an oversight that all the mitigation flora they plan will exist underneath the sky and should (if adhering to principles of mitigation) be satisfied by rainwater anyway. This means there is a strong possibility, that for the most part, irrigation from the tanks will be rejected by the trees creating boggy areas or forcing the pumped excess into drains to the reservoir, back to the tank or overflowing into footpaths and roadside drains. This means that potentially within two years of completion those tanks will have to pump into the reservoirs a lot more water than plans have so far accounted for. That water will overflow via sluice gates into the rivulet up to Dale Street at a greater rate than is currently the case.

Thus, in order to prevent a scenario whereby the drainage system is overloaded with potential effects on local flooding and the local water table, the council need to ensure that prior to any granting of planning permission, proper calculations in depth on this matter are made. The calculations should take into account the number, age, size and type of ALL trees, grasses and scrub currently on site, the surface area of draining surface soils before and after development, and, the volume of substrate down to water table level before and after development. Otherwise the council and/or the club should be held liable for any flooding or increase in flooding that may occur.

To sum up: Unless the volume of water storage tanks + the value of mitigating draining flora is greater than the combined volume of drainable substrate and spoil fill down to clay bed level as it is today + the value of draining flora as it is today; then the reservoir, sewer, drainage system and water table will be subject to greater water pressure than the plans predict and is the case today and by a calculable value (conditional to changes to precipitation levels).

An arboricultural assessment response (EWR - OD - APP - 1 - ARB - 241124 - FINAL) containing more detail about the trees on site has been provided to the planning department of SMBC.

**Water, Drainage & Flooding Full Objection Document**  
<https://www.edgeleywildlifereserve.com/saveewr.html>  
**Also supplied to Planning Department (SMBC)**

## **8. Impact on Conservation Area**

The proposed new car park (as Outlined by DC/092211), itself within the Conservation Area, will be visible from the Alexandra Park Conservation Area via Moscow Rd East and the reservoirs, especially in winter. The current woodland view, including high level tree canopy beyond the retained section, would be lost. This is demonstrated in our document - EWR-OD-3B-VIS-EVI-FINAL and contradicts 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).

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 entirety of EWR exists within the Alexandra Park Conservation Area. Conservation Areas are designated under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to preserve areas of special architectural or historic interest, *including their character and appearance*. Deciduous woodland, as a significant natural feature, contributes to this character.

The relevant factors (as listed by SMBC at <https://www.stockport.gov.uk/about-conservation-areas>) are:

*Public Space, Trees, Views and Vistas*

### **Conservation Area protections**

Planning Permission Requirements:

In Conservation Areas, certain developments that might otherwise fall under Permitted Development Rights (PDRs) require planning permission to protect the area's character. Converting woodland into a car park constitutes a material change of use, requiring explicit planning permission from the Local Planning Authority (LPA). The LPA must consider whether the development preserves or enhances the Conservation Area's character (Section 72 of the 1990 Act). A car park, with its potential to disrupt natural landscapes and visual amenity, should be deemed harmful unless significant mitigations are proposed. The planned car park cannot possibly preserve or enhance the existing woodland and the woodland's removal cannot possibly be mitigated in terms of factors contributing toward the value of Conservation Areas.

NPPF Guidance on Heritage Assets:

The National Planning Policy Framework (NPPF, 2024), paragraph 206, requires LPAs to assess the impact of proposed developments on the significance of heritage assets, including Conservation Areas. Any harm to the woodland's contribution to the area's character (e.g., visual, ecological, or historical significance) must be weighed against public benefits. The plans for this car park struggle to demonstrate sufficient public benefit to outweigh the loss of a significant green space, especially as it is the largest such natural area in the ward.

### **Tree Preservation Orders (TPOs)**

Councils have a duty to protect trees that contribute to public amenity, particularly in Conservation Areas or on public land, under the National Planning Policy Framework (NPPF, 2024), Paragraph 180, which emphasizes safeguarding biodiversity and valued landscapes. The woodland exists upon council land within a Conservation Area, it benefits from both LPA oversight and Conservation Area protections akin to TPOs.

The deciduous woodland, located within a Conservation Area, benefits from statutory protections under Section 211 of the Town and Country Planning Act 1990, requiring prior notification and LPA approval for any tree work.

This ensures that tree removal for a car park would be subject to rigorous scrutiny, equivalent to a Tree Preservation Order, to safeguard the area's heritage and environmental value.

As council-owned land, the woodland is managed under the LPA's arboricultural policies, which prioritise the retention of ecologically significant trees, akin to protections under a TPO. These policies ensure that any development, such as a car park expansion, must justify the loss of trees / woodland against their public amenity and biodiversity value.

The woodland's high amenity value, as the largest natural green space in the ward, and its biodiversity significance provide protections equivalent to a TPO. Under NPPF Paragraph 180, the LPA must prioritise its retention, ensuring that car park development is refused unless it can demonstrate negligible ecological impact, which is unlikely given the woodland's unique re-wilded character.

The proposed car park expansion would require tree removal, triggering Section 211 protections in the Conservation Area and council oversight of its own land. These safeguards, equivalent to a TPO, ensure that the LPA must reject or heavily scrutinize any proposal that harms the woodland's ecological and heritage value, especially when existing parking and alternative plans meet or would meet stadium needs.

#### Prohibited Activities:

Statutory equivalents (Conservation Area / Council land) to TPOs prohibit cutting down, topping, lopping, uprooting, or damaging trees without LPA consent. Developing this car park would involve tree removal and/or root damage (*e.g.*, from surfacing or excavation), to a large majority of the trees on site. The Outline part of DC/092211 cannot justify the loss of trees in terms of the values relating to this Conservation Area - Public (open) Space\*, Trees, Views and Vistas.

#### Amenity Value:

Visibility, environmental impact, and community enjoyment are important considerations in terms of public amenity. A deciduous woodland, especially the largest green space in the ward, qualifies due to its ecological and aesthetic contributions. The protection of these trees within a Conservation Area already bring public benefit.

#### National Planning Policy Framework (NPPF):

The NPPF provides overarching guidance that LPAs must follow when making planning decisions, emphasizing sustainable development and environmental protection.

#### Biodiversity and Green Spaces (Paragraph 180):

The NPPF prioritises protecting and enhancing biodiversity, including habitats like deciduous woodlands. Development resulting in significant harm to biodiversity should be refused unless the harm can be mitigated or compensated. Converting this woodland to a car park would cause significant ecological loss. No justification or offsetting measures can practically compensate for the loss of Edgeley's largest wildlife space / Natural Green Space.

#### Open Space Protection (Paragraph 103):

The NPPF protects open spaces of community value, particularly those with environmental significance. As the largest Natural Green Space in the ward, the woodland qualifies, and its loss to a car park can not be justified by providing alternative spaces of equal value because a) there aren't any, and b) it would take decades to establish an equivalent (the loss to ecology in that time would be irreversible). In the context of the existence of this unique habitat within a Conservation Area, EWR is irreplaceable.

Councillors and decision makers should also be aware that It is wrong for departure from Open Space designation to be agreed upon at the advice/suggestion of the private company wishing to develop the land (as has been the case with this application), more so when it exists within a Conservation Area.



#### Sustainable Development:

The NPPF's presumption in favour of sustainable development (Paragraph 11) can be countered if the development causes demonstrable harm to valued landscapes or biodiversity, which a car park in a woodland does do.

#### Forestry and Permitted Development

EWB is a woodland. Woodlands are Habitats of Principal Importance. Forestry-related activities have some exemptions under the General Permitted Development Order (GPDO) 1995, but these do not support car park development.

#### Forestry Exemptions:

Part 7 of the GPDO allows certain forestry buildings (e.g., tool sheds) without planning permission, but a car park does not qualify as a forestry-related use. Any change of land use to a car park requires planning permission, and the Prior Notification Procedure would apply, giving the LPA 28 days to assess the proposal's impact on the Conservation Area.

#### Non-Forestry Use:

Converting woodland to a car park is a non-forestry use, automatically requiring planning permission. The LPA should evaluate the proposal against Conservation Area and environmental policies, and reject the Outline part of DC/092211 based upon harm to the woodland's character and/or ecology, recognizing it as a unique habitat within the Conservation Area.

#### Local Planning Policies

The Environment Act gives power to the Government's 25 year plan authorizing Local Authority to identify and protect and include specific policies to *protect* green spaces and Conservation Areas.

National Government expects Local Authorities to have policies prioritizing the retention of green spaces, especially those with ecological or community value. EWB's status as the largest natural green space in the ward strengthens its protection under local biodiversity or open space policies. If SMBC has no published Local Nature Recovery Strategy then it must concur with that of Greater Manchester Combined Authority. SMBC has been made aware that EWB stands to be considered for protection and designation and no plans to develop the land should be granted until its viability as a Local Nature Reserve is assessed properly and honestly with an in-depth Conservation Area Appraisal and Management Plan.

#### Planning (Listed Buildings and Conservation Areas) Act 1990

Section 69 of the Planning (Listed Building and Conservation Areas) Act 1990 defines Conservation Areas as 'areas of special architectural or historic interest, the character or appearance of which it is desirable to *preserve or enhance*'. When planning development in a UK conservation area, councils have a statutory duty to consider the *preservation* and enhancement of the area's character. This means that planning applications are assessed not only on normal planning grounds, but also on how they affect the Conservation Area's appearance.

#### Policies for Conservation Areas

Section 71 of the act requires LPAs to formulate and publish proposals for the preservation and enhancement of conservation areas. There is also a duty to consult the public on the proposals.

(1)It shall be the duty of a local planning authority from time to time to formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas.

(2)Proposals under this section shall be submitted for consideration to a public meeting in the area to which they relate.

(3)The local planning authority shall have regard to any views concerning the proposals expressed by persons attending the meeting.

Clearly the production of a Conservation Area character appraisal at the time of designation or review is essential to provide an understanding of what the council is seeking to conserve. Planning Act 1990:71: (1) clearly states that SMBC must formulate any proposals relating to preservation and enhancement within [existing] Conservation Areas. It also stands that in regard to notions of *enhancement* (by council or 3<sup>rd</sup> parties) any changes must also therefore fall under public consultation.

#### Planning powers in Conservation Areas

Section 72 of the act requires that LPAs pay special attention in the exercise of planning functions to the desirability of preserving or enhancing the character or appearance of a conservation area.

(1)In the exercise, with respect to any buildings or other land in a conservation area, of any [functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of *preserving* or enhancing the character or appearance of that area.

This means that LPAs must take account of this in the adoption of planning and council policies, development control decisions, enforcement, controls relating to trees, advertisements, properties in need of maintenance and in exercising their highway powers. With such powers in place, there is all the more reason for LPAs to take a holistic and strategic approach to the management of their conservation areas and to ensure that they have the proper resources and skills to do so.

National planning policy and advice from Historic Scotland and English Heritage is placing greater emphasis on the need to take a holistic and proactive approach to managing conservation areas and making full use of planning powers. Clearly an understanding of a conservation area's qualities and issues is key to developing the most suitable management tools and policies, along with the need to foster public and political support and to secure a resource commitment. The introduction of Article 4 directions should be considered in those areas which are vulnerable to insensitive incremental damage and a greater adoption of public realm strategies is needed in urban areas.

Councillors and decision makers should also be aware that a car park situated upon EWR in the context of use for heavy footfall events such as football matches and concerts would not only effect views and trees and vistas but increase noise, litter and light directly within the Conservation Area.

#### Conservation Area Duty-of-Care

It should be noted that the only litter picks to have been practiced within EWR for at least the last four years have been done by Edgeley Wildlife Reserve Group and not by the leasee. It should also be noted that the leasee has been responsible for leaving behind large amounts of refuse within the Conservation Area, particularly from works done beyond the border of EWR to the north. There were also numerous instances in the past winter where the leasee left the club's main sign light on throughout the night. The effect of the bright yellow glow gave the impression of daylight in the area of EWR and the surrounding neighbourhood throughout the night and the birds were calling throughout those nights. EWRG are also concerned about the historical practice of the leasee of pushing large amounts of snow from its existing hard surface areas over the boundary and onto the undergrowth of the northern bank of the Sykes reservoir - potentially trapping wintering blackbirds and other species.

NPPF / 16. Conserving and enhancing the historic environment.

The proposed development (the Outline part of DC/092211) will lead to substantial harm to a Natural Green Space within a Conservation Area and a significant impact by way of loss of biodiversity and ecosystem / ecoservice potential to the wider area. As an existing unique habitat locally, the site (EWR) is perfectly suited to benefit the community as a gated Local Nature Reserve and meets all nine requirements set out by government for designation as a Local Wildlife Site (local xxx). Such a designation would conserve its existing immediate and medium term benefits for use in the long term and interest has already been established by Sector 3 groups involved in the local community.

**EWR and Criteria for Local Wildlife Sites**

<https://www.edgeleywildlifereserve.com/saveewr.html>

**Also supplied to Planning Department (SMBC)**

## **9. National Planning Policy Framework**

NPPF / 15. Conserving and enhancing the natural environment:

**187.** Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate; d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs; e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

**188.** Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

**192.** To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity

**193.** When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

**195.** The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

## 10. Impact on Highways

In seeking justification for car parking spaces Asteer have referred to SMBC's *Adopted Parking Standard* policy and quoted the maximum standard for stadia. Based upon a stadium seating 18,000 that maximum provision is 1,200 parking spaces.

Councillors and decision makers should be aware that although the *Stockport Adopted Parking Standard* policy in regard to stadia does have guidance/policy for maximum quota of general parking provision, being 1 space per 15 seats, it has **NO minimum standard** for general parking provision (as opposed to having a minimum for disabled parking provision).

We surmise that having **NO minimum standard** for general parking is an important consideration when evaluating future developments (of stadia) in regard to promoting sustainable travel, as well as in protecting areas of natural green space important to local areas.

### Examples of New Modern Stadia Development

**A) Tottenham Hotspur Stadium, London. Premier League. Capacity 62,850.** Opened in 2019.

Based upon SMBC's standard the maximum parking provision would be for 4,190 parking spaces. The Tottenham Hotspur Stadium currently has **319** spaces for staff, players and media. This equates to 1 space per 197 seats.

The equivalent at Stockport County (assuming capacity of 17,800) would be provision for **90** vehicles as opposed to the 160 or so planned. That difference in number equates almost exactly to the number of spaces which would be provided if EWR were to be flattened (according to plans) .

In keeping with attempts to achieve sustainable travel targets, THFC encourage use of public transport, a club operated shuttle service, and arrangements with green buses.

**B) Everton Stadium, Liverpool. Premier League. Capacity 52,888.** Opens 2025/26.

Based upon SMBC's standard the maximum parking provision would be for 3,525 parking spaces. The new Everton stadium doesn't have dedicated parking spaces. Instead, the club will operate a scheme promoting sustainable travel and agreements with ample parking areas (such as industrial zones) and new parking zones within walking distance.

### English Football League Guidelines

As well as the council having **no minimum** quota for parking provision and taking example from other leading clubs in urban settings it can be noted that the English Football League guidelines with reference to the Companies Act 1985 in Section Six states the following:

**Section Six | EFL Regulations: Appendix 1 / Membership Criteria / Part 3 - The football club and the ground upon which it plays:**

22: BROADCAST FACILITIES

*22.4: Outside Broadcast Compound. At each League Match, the Home Club shall provide a secure, level area (suitable for the parking of the Broadcast Partner(s) vehicles) outside and adjacent to the Stadium*

*of at least 1500m<sup>2</sup> for Championship Clubs and 600m<sup>2</sup> for League One and Two Clubs, for the exclusive use of the League's and Broadcast Partner(s) vehicles ('Outside Broadcast Compound').*

**p399 (doc) / p214 (pdf)**

*22.5 The Outside Broadcast Compound shall:*

*22.5.1 be sufficiently close to the Stadium to allow for access to the Stadium power supply;*

*22.5.2 guarantee access to the Stadium's network access facility for the Broadcast Partner(s);*

*22.5.3 be separate from (or sufficiently divided from) the general supporter car park(s);*

Guidance

*The Outside Broadcasting Compound should include a minimum of 20 parking spaces in, or as near to, the compound as possible for use by Broadcast Partner(s) crew, which is included in the total space required for the Outside Broadcasting Compound (i.e. it is not additional to the requirements of paragraph 22.4)*

**p400 (doc) / p 215 (pdf)**

## 24: PARKING FACILITIES

*24.1 Parking facilities must be provided for Directors, with a **minimum** of 6 places for the visiting Directors and club officials in a location comparable to those provided to Home directors. There must be safe parking arrangements for both the visiting team's coach and the Match Officials. All shall be provided free of charge.*

**p410 (doc) / p216 (pdf)**

In paragraph 24, 'Parking Facilities', there are no rules nor guidance for provision of parking for press, and in paragraph 21, 'Press Facilities', there is no mention of provision for parking.

The entirety of land available to the development (not including Edgeley Wildlife Reserve) for staff, executive, and player parking and for an outside broadcast compound consists of the existing car park at the west / Cheadle End (approximately 2,130m<sup>2</sup>) and the east side (approximately 5,740m<sup>2</sup>). Both of these have close and convenient access to the respective ends of the south stand. The total area is approximately 7,870m<sup>2</sup>. With the deduction of the space needed to create an Outside Broadcasting Compound of 1,500m<sup>2</sup> that leaves approximately 6,200m<sup>2</sup> of space to allow for parking for staff, players and executives.

Taking into consideration **no minimum requirements for parking provision** by SMBC, **examples of leading premier league clubs** and **English Football League Guidelines** we can see that it should be unnecessary for SCFC to destroy Edgeley Wildlife Reserve to create extra parking spaces. The east side offers space for around 76 cars, the west currently has potential for 85 cars (a total of 161).

When considering the proximity of the ground to the local transport hub, train station, bus stops, cycle routes, footpaths, nearby large NPC car park (often empty on match days), other local car parks (often empty on match days), any shuttle schemes that can be introduced, and the introduction of residential car parking zone schemes, there is no official argument for creating extra car/coach parking spaces.

The council committee and planning processes exist, not to commit to foregone conclusions, but to determine the best way forward - even if it means changes to plans. Edgeley Wildlife Reserve Group consider the current plans (in particular the outline plans for the south stand) represent what the football club want, not what they need - at the cost of the largest area of natural green space in Edgeley.

Stadium expansion will induce traffic and in our opinion, there is, or should be (according to council process) still scope for a re-design of the new Stockport County south stand and/or it's envisioned car park which would retain EWR in full and commit to more sustainable means of transport. EWRG believe that the solution exists

in convincing a mere 175 people or so (70 cars), from a perceived figure of 19,700, to seek alternative modes of transport and for the proposed new south stand to be re-thought at architectural level.

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 other parking areas, releasing the spaces that currently house the food court, which can now be catered for inside the new stands.



## **11. Community & Health**

### **Social Cohesion & Health and Wellbeing**

‘Fresh air and exercise’ has long been recommended as a way for many to feel better, physically and mentally. Now evidence shows us that the quality of our relationship with nature is part of the reason for its positive impact on our well being. Researchers use the term ‘connectedness’ to describe the ideal relationship. ‘Connectedness’ refers to the way we relate to nature and experience nature. A strong connection with nature means feeling a close relationship or an emotional attachment to our natural surroundings.

#### **Mental Health & Nature 2021 / Mental Health Foundation**

Whilst nature can be found anywhere, high-quality nature spaces which we know are most likely to help support good mental health are not available equally to everyone in the UK. This is a more complicated picture than just how far we live from a high-quality nature space. Proximity is certainly a factor, with deprived communities least likely to live near a high quality nature space. Perhaps unsurprisingly, our poll found that people living in urban areas were less likely than rural residents to connect with nature as much as they wanted, and people without gardens less likely than those with gardens. Younger adults in particular may face many barriers to connecting with nature. People living with a disability or health condition often face particular barriers to access, when natural spaces are not equipped with inclusion in mind or there is a lack of accessible routes. For some groups, including many women, younger people, disabled people and people from ethnic minorities, nature spaces may feel inaccessible or less enjoyable because they are not safe – from risk of physical harm, sexual harassment, hate crime or discrimination. For many of these groups there is a double effect of this inequality.

#### **Mental Health & Nature 2021 / Mental Health Foundation / p5**

The number of people who spend little or no time in natural spaces is too high. Recent data from the Monitor of Engagement with the Natural Environment survey tells us that some 12% of children do not visit the natural environment each year. In the most deprived areas of England, people tend to have the poorest health and significantly less green space than wealthier areas. In healthcare and school settings, and despite some excellent examples of pioneering practice, the possible benefits of contact with nature to promote good mental health or support early interventions for mental health problems are often overlooked.

#### **25 yr Environment Plan / UK Govt / p72**

Many individuals in Edgeley, including children, marginalised groups, and people with disabilities or health problems, have interests other than football. They also need gateways leading to social interaction and local more accessible opportunities to enjoy and benefit from the activities within natural habitat that urban wildlife and nature reserves can provide. Such activities would include being involved in the protection, creation, restoration, enhancement and management of urban nature reserves as well as activities which such reserves can provide. Access to such areas should be one of the priorities considered in town planning.

Edgeley and its people should not be defined by football alone. People value the natural world in many different ways and for different reasons. These include valuing it for its own sake (sometimes called its ‘intrinsic’ or ‘existence’ value), because it makes our streets and gardens more attractive, or because people enjoy experiencing nature-rich green places for recreation, whether a walk in a park or in relatively wild places such as National Parks. Others enjoy bird watching, or activities such as angling or wildfowling. Evidence supports what many people feel instinctively – that regular **opportunities to experience natural environments have quantifiable**

**positive impacts** on our mental and physical health. A host of other ecosystem services are also becoming better understood.

Local authorities are positioned with key roles to protect and enhance biodiversity and wildlife habitat and to make decisions and deliver actions which meet the need for positive changes in attitudes and policies that contribute to a myriad of beneficial aspects which a healthy ecosystem (global, national and local) will deliver. These beneficial aspects are termed 'ecoservices' and they have widespread often not directly obvious positive implications on health, well being and education which in turn have a positive and long lasting impact on economy.

Edgeley is an area deprived of Natural Green Space and wildlife habitat. In the case of the Outline Part of Planning Application DC/092211, Stockport Metropolitan Council have the power and opportunity to protect and avoid the destruction of an existing habitat. That habitat is the only reasonably sized area capable of sustaining wildlife to any meaningful degree in Edgeley and has the potential to benefit the Edgeley community and wider communities with ecoservices.

In view of declarations made by authorities and the commitments agreed to, along with the knowledge in data/statistics and findings presented by numerous institutional conservation organisations; the need to protect and enhance such sites in such areas is absolutely evident. EWR may be a small stone on a global mountain but it is a monumental gate pillar in local terms, both for the creatures which rely upon it, the catchment area of eight primary schools, the Edgeley community, and for other reasons covered in EWRG Objection Documents Part 3: *Ecology & Biodiversity* and Part 4: *Community, Health & Education*.

A wealth of information, data and guidance is available in support of nature for health.

**Community, Health & Education Full Objection Document**

<https://www.edgeleywildlifereserve.com/saveewr.html>

**Also supplied to Planning Department (SMBC)**

## **12. Economic Argument**

### **Ecosystem Services**

The woodland's ecosystem services provide long-term economic benefits that outweigh the short-term convenience of additional parking for a football stadium, which likely has limited match-day, event and operational use.

#### **Carbon Sequestration and Climate Regulation:**

A 0.5806-hectare deciduous woodland with an estimated 90 trees (assuming 150 trees per hectare, typical for urban woodlands) sequesters approximately 1.5 tonnes of CO<sub>2</sub> annually (each tree sequesters 15 kg CO<sub>2</sub>). At UK carbon prices (£85/tonne in 2025), this is valued at £128/year. Developing 0.4352 hectares (75% of the woodland) would reduce this to £32/year, losing £96/year. Over 20 years, this loss totals £1,920, plus increased emissions from vehicle traffic and impermeable surfaces, costing the council £18,000 in climate mitigation efforts (e.g., tree planting elsewhere). Retaining the full woodland avoids these costs and supports net-zero goals.

#### **Air Quality Improvement:**

The woodland filters pollutants like PM2.5 and NO<sub>2</sub>, contributing to £190 million in UK-wide healthcare savings, per Public Health England. For 0.5806 hectares, this translates to £7,300/year in local healthcare savings (scaled from national estimates for urban tree cover). Developing 0.4352 hectares would reduce this to £1,825/year, losing £5,475/year. A car park expansion increases vehicle emissions, raising NHS costs for respiratory issues by £7,500/year in the ward, especially without the woodland's buffering effect.

#### **Biodiversity Support:**

A re-wilded, biodiverse woodland supports pollinators and wildlife, underpinning food security and ecological resilience. Pollinators contribute £400-£680 million annually to UK agriculture. Losing this habitat to a car park would require expensive biodiversity offsetting (mandated by the Environment Act 2021's 10% Biodiversity Net Gain requirement), potentially costing developers £20,000-£50,000 per hectare to replicate elsewhere.

### **Social Cohesion**

Urban woodlands foster community interaction and social capital, which have economic ripple effects.

#### **Community Value and Property Prices:**

Green spaces increase property values by 5-15%, according to studies from the Office for National Statistics. A small woodland could boost local property values by £5,000-£15,000 per household within 500 meters, increasing council tax revenue. A car park, conversely, may depress property values due to noise, pollution, and reduced aesthetic appeal, potentially costing the council £100,000+ in lost revenue over time.

**Community Conflict:** Prioritizing stadium parking over a public green space risks alienating residents, reducing social capital. The woodland unites diverse groups, while a car park for elite users may foster resentment, requiring council resources to manage backlash (e.g., £7,500 in consultation or PR costs).

#### **Reduced Social Costs:**

Woodlands provide spaces for social interaction and organised activities, reducing social isolation and associated costs (e.g., mental health services, estimated at £105 billion annually in the UK). A car park offers no such benefit and may deter community engagement by prioritizing vehicular use over pedestrian-friendly spaces.

### **Health and Well-Being**

The woodland's role in promoting physical and mental health translates into significant economic savings.

#### Mental Health Benefits:

Access to green spaces reduces stress, anxiety, and depression, saving the NHS £2.1 billion annually in mental health costs, per Public Health England estimates. A small woodland, as the largest green space in the ward, has potential to serve as a key recreational area, offering residents free access to nature-based therapy. A car park provides no equivalent benefit and may increase stress through urban sprawl and traffic congestion.

#### Physical Health:

Woodlands encourage physical activity (e.g., walking, jogging), reducing obesity and cardiovascular disease. The UK spends £6 billion annually on obesity-related healthcare; green spaces can cut this by promoting exercise. A car park encourages sedentary behaviour, potentially increasing healthcare costs.

#### Heat and Noise Mitigation:

The woodland cools the environment and buffers stadium noise, saving £5,850/year in health and mitigation costs (scaled from £200 million UK-wide). Developing 0.4352 hectares would lose £4,388/year, as the car park exacerbates heat island effects and noise. Urban woodlands mitigate heat island effects, reducing heat-related illnesses (costing the NHS £200 million annually). A car park absorbs and radiates heat, exacerbating health risks and requiring costly urban cooling measures.

### Community Activities

The woodland can support inclusive community activities that generate economic and social value, unlike a car park.

#### Recreational Value:

Urban Woodlands and Nature Reserves support community activities such as nature walks, bird watching, foraging workshops, or educational/school programs, fostering community engagement and local economic activity, attracting local spending (e.g., on guided tours or community events). A small woodland could generate £10,000-£50,000 annually in local economic activity through volunteer-led events or ascendancy, or community cohesion.

#### Cultural and Educational Benefits:

Re-wilded woodlands serve as living classrooms for environmental education, fostering community pride and knowledge. Schools and youth groups can use the space for free or low-cost programs, saving councils thousands annually compared to funding alternative educational venues. A car park has no such cultural or educational value.

#### Stadium Synergy:

The woodland could host nature based fan engagement events, attracting sponsorships or grants. A car park offers no such synergy and may deter eco-conscious fans.

### Long-Term Economic Resilience

#### Future-Proofing Urban Areas:

Protecting the woodland aligns with long-term urban planning trends favouring green infrastructure over car-centric development. As cities like London push for net-zero emissions by 2030, woodlands contribute to carbon neutrality, whereas car parks entrench reliance on fossil fuel-based transport, risking stranded assets as parking demand falls (e.g., UK car park usage dropped 10-15% in urban areas from 2019-2024 due to remote work and sustainable transport policies). Retaining the woodland avoids future retrofitting costs (e.g., £50,000-£200,000 to convert a car park back to green space).

#### Tourism and Local Identity:

A biodiverse woodland enhances the area's appeal as a destination for eco-tourism or local recreation, potentially attracting £20,000-£100,000 annually in visitor spending, especially if marketed as a unique re-wilded site within a Conservation Area.

#### Balancing Stakeholder Needs

The stadium's existing parking and the space available to accommodate it suggests the additional 0.4352 hectares is not critical.

Alternatives include:

Optimize Existing Parking: Reorganize current spaces, preserving the woodland's benefits.

Sustainable Transport: Subsidize public transport or cycling for staff/officials aligning with UK policy and avoiding BNG costs.

#### Comparative Economic Analysis

Woodland Retention (0.5806 hectares):

Annual Value: £75,000 (ecosystem services, health, property uplift, activities).

Costs: £7,500/year (maintenance).

Long-Term Gains: Sustained benefits, policy alignment (NPPF Paragraphs 103, 180), heritage grants (£33,000).

Annual Value: £50,000-£200,000+ from ecosystem services (carbon, air quality, flood mitigation), property value uplift, health savings, and community activities.

Long-Term Benefits: Sustained ecosystem services, increased property tax revenue, reduced healthcare and climate adaptation costs, and enhanced community resilience.

Costs: Minimal maintenance (£5,000-£20,000/year for paths, signage, or invasive species control), offset by volunteer efforts and grants (e.g., National Lottery Heritage Fund).

Car Park Development:

Costs: £100,000-£500,000 for construction (clearing, surfacing, drainage), plus ongoing maintenance (£10,000-£30,000/year) and biodiversity offsetting (£20,000-£50,000 under Environment Act 2021).

Losses: Permanent loss of ecosystem services (£50,000-£150,000/year), reduced property values (£50,000-£150,000 in lost tax revenue), and increased health and flood management costs (£10,000-£50,000/year).

#### Strategic Considerations

Conservation Area Protections: The woodland's role in the Conservation Area (Planning Act 1990, Section 72) restricts development, per NPPF Paragraph 206.

Community Advocacy: Emphasize the woodland's universal benefits versus the car park's elite use, citing Natural Capital Committee (2020) valuations (£3,000/person/year).

Stadium Reputation: Woodland retention enhances the stadium's image, attracting eco-conscious sponsors, while expansion risks PR costs (£7,500).

Policy Alignment: Retaining the woodland aligns with the National Planning Policy Framework (NPPF, 2024), particularly paragraphs 103 (open space protection) and 180 (biodiversity enhancement), strengthening planning objections to car park development. It also supports Environment Act 2021 biodiversity net gain requirements, which a car park would struggle to meet without costly offsets.

### Community Leverage:

The woodland's status as the largest natural green space in the ward amplifies its value for social cohesion and health, rallying community opposition to development. Public campaigns can highlight economic benefits, citing studies like the UK's Natural Capital Committee (2020), which valued urban green spaces at £2,000-£4,000 per person annually in health and well-being benefits.

### Conservation Area Synergy:

As part of a Conservation Area, the woodland's preservation enhances the area's heritage value, potentially attracting heritage grants (e.g., £10,000-£100,000 from Historic England), which a car park would not qualify for.

### Conclusion

Protecting the urban re-wilded deciduous woodland delivers superior economic benefits—estimated at £50,000-£200,000 annually in ecosystem services, health savings, property value uplift, and community activity revenue—compared to a car park's limited and declining returns, offset by high construction and ecological costs). The woodland's role in carbon sequestration, air quality improvement, flood mitigation, biodiversity, social cohesion, and health promotion aligns with UK policy and long-term urban trends, while a car park risks obsolescence and environmental harm. Community advocacy, emphasizing these economic and social benefits, can strengthen the case for designation as a protected Local Green Space or Site of Importance for Nature Conservation.

Protecting the 0.5806-hectare (5,806 m<sup>2</sup>) woodland delivers £75,000 annually in ecosystem, health, social, and community benefits, a 0.4352-hectare (4,352 m<sup>2</sup>) car park, incurs £211,056 in costs and losses. Existing parking and alternatives like optimization or sustainable transport align with UK policy (NPPF, Environment Act 2021). Community advocacy and Conservation Area protections can block the expansion, ensuring long-term gains.