

Edgeley Wildlife Reserve Group

EWRG Objection Document

Objection to the Outline Planning Part of HYBRID APPLICATION - Part full / part outline planning application proposing the expansion to the football club stadium to provide up to 7,405 additional seats

Reference: DC/092211

Reference:

DC/092211

Parts of Whole Document

Executive Summary

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

Executive Summary

Edgeley Wildlife Reserve Group object to the outline part of planning application DC/092211 which includes plans to develop, change and/or disturb a parcel of land (referred to as EWR) for the purpose of the development of a car park south of the stadium.

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.

As the recent State of Nature Report shows, the decline in abundance of our wildlife is accelerating. Numbers of birds alone have almost halved in the last fifty years. Even comprehending this time scale, after over 3,500 years of British occupation since the Copper Age, is monumental. Now that the situation is recognised nationally (as well as globally) it is equally difficult to comprehend the lack of protection and designation of such sites at local level. Already an existing refuge locally, with enhancement, this land as it is now, offers real potential in contributing toward stemming these declines nationally. The potential also exists for this land to benefit local community in other ways. Only by starting at local levels can anything change.

The parcel of land's current state, its potential, its uniqueness locally, its relevance to the reservoir ecosystem and beyond that the wider river system, its connection to existing but as of yet un designated green corridors, and its place in the patchwork of the greater picture of habitat recovery, all bear relevance to commitments made by politicians on local, national and global stages. In the context of Edgeley, this area of land is irreplaceable. With the absence of a Local Plan, a Local Nature Recovery Strategy and a Biodiversity Action Plan, and according to the policies in the National Planning Policy Framework 2023, The Environment Act, and legally binding commitments toward biodiversity in regard to ecology, habitat and local communities, the land should be considered as an asset warranting protection.

As part of the objection to its development as a car park, this document presents an idea for a gated nature reserve offering local ecoservices to benefit community health, wellbeing, education and social cohesion. The idea includes community and school growing beds; social participation activities; flood risk prevention and mitigation ideas; enhancement of biodiversity; protection, restoration and encouragement of native species of flora and wildlife; and protection of the site's existing qualities contributing to cooling/shading and carbon storage.

The lone representation of this parcel of land as viable habitat in the context of the local area considered in context of legally binding commitments to recover nature and improve biodiversity at local and community levels needs to be considered. As it stands today, this parcel of land can deliver 'benefits for nature and support efforts to address climate change'. It cannot possibly be classed as surplus to requirements considering its potential to be enhanced to offer ecosystem opportunities to the local community. Opportunities for new provision in the form of a gated nature reserve in an area deprived of access to natural habitat should be informing assessments of the area.

This document delivers information about the area and this parcel of land. It provides survey material, local knowledge, and testimonies. The document refers to legally binding commitments which government (national and local) are duty bound to adhere to. It also provides comment on policies and strategies (national and local) which are relevant to this planning application. A description of the habitat(s), the flora and fauna as they exist today is provided and the potential of the area to be enhanced for nature and people is mentioned throughout the document.

In part two the geographical area this document is concerned with is defined. Part 3 argues against the outline part of the planning application on the grounds of the ecological value of Edgeley Wildlife Reserve and its importance as a biodiversity system in terms of local, national and global relevance and in accordance to legally binding commitments including those related to human benefits (ecosystem services). Image content is supplied as appendix to represent evidence of re-wilding, time the land has been unchanged, undeveloped and unmanaged, the nature of the land planned to be lost to development, contrast with subjective images contained within ecological surveys employed by the planners, and the richness of the habitats.

The argument against a car park in favour of a designated nature reserve on the basis of community health, wellbeing, education and social cohesion is covered in part four. The Edgeley community is deprived of true natural space and it considers lack of access to nature from a human perspective.

Part five adds to the argument against a car park and in favour of a designated nature reserve on the basis of the impact of developing a car park on the site of a spring fed rivulet which is ecologically connected to the neighbouring reservoirs and exists in an area already prone to serious flooding of houses and streets. Conservation Area status is the subject of part six, which is concerned with the reasons, regulations, guidelines and commitments involved in such designations. Ideas to consider alternatives for the car park are put forward in part seven and relate to legally binding commitments. A summary of all parts of this document and the final conclusions drawn in the final part, part eight.

This parcel of land, Edgeley Wildlife Reserve, constitutes 40% of all of Edgeley district's wildlife habitat. It is wrong to turn it into a car park. Instead, it should be protected, restored and enhanced. A rich network of organizations, bodies, conservation groups, voluntary groups, and funding opportunities exist to help do this. In Edgeley, local people, young and old, can benefit when Stockport helps nature to recover. Shortening the gap, expanding people's life chances, life expectations, health, standard of living, access to services and support can be boosted by caring for the environment which is so important to the others we share this land with.

EWRG believe that the solution exists in convincing a mere 175 people or so, 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.

EWRG

1. INTRODUCTION

Contents

Part 1: Introduction

<u>1. Introduction</u>	<u>6</u>
1.1. Edgeley Wildlife Reserve Group	6
1.2. Area of Concern	6
1.3. This Objection Document	6
1.4. Parts of this Document	7
Part 1: <i>Introduction</i>	
Part 2: <i>Site Boundaries</i>	
Part 3: <i>Ecology & Biodiversity</i>	
Part 3.b.: <i>Visual Evidence</i>	
Part 4: <i>Community, Health & Education</i>	
Part 5: <i>Water, Drainage & Flooding</i>	
Part 6: <i>Conservation Area</i>	
Part 7: <i>Alternatives</i>	
Part 8: <i>Conclusion / Summary</i>	
1.5. Numbering in this Document	8

Part 2: Site Boundaries

<u>2. 1. Site Boundaries</u>	<u>10</u>
2.1.1. Identifying the Geographical Area	10
2.1.2. Measurements Of The Geographical Area	14
2.1.3. Lease of Land Encompassing EWR	14
2.1.4. Measurements Of The Unleased Strips	15
2.1.5. The Land Leased by SCFC	16
2.1.6. Ownership Information	17
<u>2.2. Habitat Lost and Remaining</u>	<u>18</u>
<u>2.3. Retained Section Border Loss</u>	<u>19</u>
<u>2.4. Area Actually 'Retained' By The Club</u>	<u>20</u>
<u>2.5. The Last Accesible Vestige of Wildlife Habitat in Edgeley</u>	<u>21</u>

1.0. Introduction

1.1. Edgeley Wildlife Reserve Group

The aim of Edgeley Wildlife Reserve Group is to protect Edgeley Wildlife Reserve by working with Stockport County Football Club, Stockport Metropolitan Borough Council, local environment focused community groups and regional/national organisations to create a gated wildlife reserve in order to protect and enrich/enhance existing local habitat for wildlife and provide an education and respite area for local children and community groups.

1.2. Area of Concern

We consider the area of concern to be an established reserve for nature, already existing, not only as a wildlife habitat, but Edgeley ward's *only* habitat capable of sustaining wildlife to any meaningful degree. For purposes of clarity, the land in question (referred to as part of 'a *site*' in planning application literature) will be referred to throughout this document as 'EWR'. EWR will refer only to the land described in the chapter Site Boundaries (See Part 2: *Boundaries*) and is only part of the land listed by Stockport County FC for development.

1.3. This Objection Document

This document sets out what EWR currently encompasses as well as its potential for wildlife and its potential benefit for health and community. EWR's current classification, lack of designation and its place in the wider context of local ecology are illustrated.

The document draws upon measures and commitments related to the ongoing biodiversity and climate emergencies and upon national, regional, local authorities' and institutional conservation organisations' strategies and policies related to those commitments and measures.

The document creates a case against any urban development (*i.e.* the planned car park) of EWR (and therefore the outline part of planning application DC/092211) and presents alternatives which the council should consider according to guidelines, policies and principles they have already committed to.

The document is concerned wholly and only with the construction of a car park as outlined in the outline planning application part of Hybrid Application DC//092211. EWRG does not object to the development of Stockport County Football Club per se.

The council should contemplate the contents of this document and its ancillary media and appendices, when making a decision concerning planning applications for the area described in this document as EWR.

1.4. Parts of this Document

The parts contained in this document are:

Part 1: *Introduction* (*This part*)

Part 1 is this introduction.

Part 2: *Site Boundaries* (sometimes referred to as just Part 2: *Boundaries*)

Part 2 defines the geographical area this document is concerned with.

Part 3: *Ecology & Biodiversity*

Part 3 argues against the outline part of the planning application on the grounds of the ecological value of Edgeley Wildlife Reserve (EWR) and its importance as a biodiversity system in terms of local, national and global relevance and in accordance to legally binding commitments including those related to human benefits (ecosystem services).

Part 3.b.: *Visual Evidence*

This part supplies image content to represent evidence of re-wilding, time the land has been unchanged, undeveloped and unmanaged, the nature of the land planned to be lost to development, contrast with subjective images contained within ecological surveys employed by the planners, and the richness of the habitats in EWR.

Part 4: *Community, Health & Education*

This part adds to the argument against a car park in favour of a designated nature reserve on the basis of community health, wellbeing, education and social cohesion. It considers lack of access to nature from a human perspective. The Edgeley community is deprived of true natural space.

Part 5: *Water, Drainage & Flooding*

This part adds to the argument against a car park and in favour of a designated nature reserve on the basis of the impact of developing a car park on the site of a spring fed rivulet which is ecologically connected to the neighbouring reservoirs and exists in an area already prone to serious flooding of houses and streets.

Part 6: Conservation Area

Part 6 argues against the outline planning application on the basis of Conservation Area status and the reasons, regulations, guidelines and commitments for and to Conservation Areas.

Part 7: Alternatives

This part puts forwards ideas, and relates to legally binding commitments to consider alternatives for the car park.

Part 8: Conclusions (sometimes referred to as Part 8: *Summary*)

This part is the final summary of the whole document and all of its parts.

1.5. Numbering in this Document

Page Numbering

Each part is numbered separately apart from Parts 1 and 2 (*Introduction* and *Site Boundaries*) which are numbered together.

Document Chaptering

This document is divided into parts, chapters and sections in the following manner:

Document: Edgeley Wildlife Reserve - EWRG Objection Document

Parts numbered as: **1, 2, 3, etc.**

Chapters (using Part 1 as example) numbered as **1.1; 1.2; 1.3. Etc**

Sections (using Part 1, Chapter 1, as example) numbered **1.1.1.; 1.1.2.; 1.1.3. Etc**

Sub-sections (using Part 1, Chapter 1, Section 1, as example) numbered **1.1.1.a.; 1.1.1.b.; etc**

Section and Sub-section sub-headers underlined. e.g., What is The Local Plan

*In this document, *True Natural Space* refers to non-fragmented wild, wilded/rewilded (even if enhanced for nature) areas of land usually within urban environments as opposed to managed and planted parks used as open public amenities. *True Natural Spaces* are where (for the greater part) nature has taken course over decades to provide ample security and refuge for wildlife.

2. BOUNDARIES

2. 1. Site Boundaries

This part is concerned with boundaries and measurements. All measurements are approximate and not meant to be technically accurate.

2.1.1. Identifying the Geographical Area this Document is Concerned With

The area this document terms as *EWR* is situated with immediate boundaries north of Moscow Road East; East of Sykes Reservoir; west of the footpath running from Edgeley Road/Mercian Way to Moscow Road East parallel with the railway line; and south of the football stadium.

In Fig:2.1 below it is defined by the opaque layer.

Fig:2.1



Note: This illustration does not use exact legal boundaries (discussed in 2.x) but is an appropriate guide for the purposes of identifying the area.

In Fig:2.2 below EWR is defined by the blue outline.

Fig 2.2.

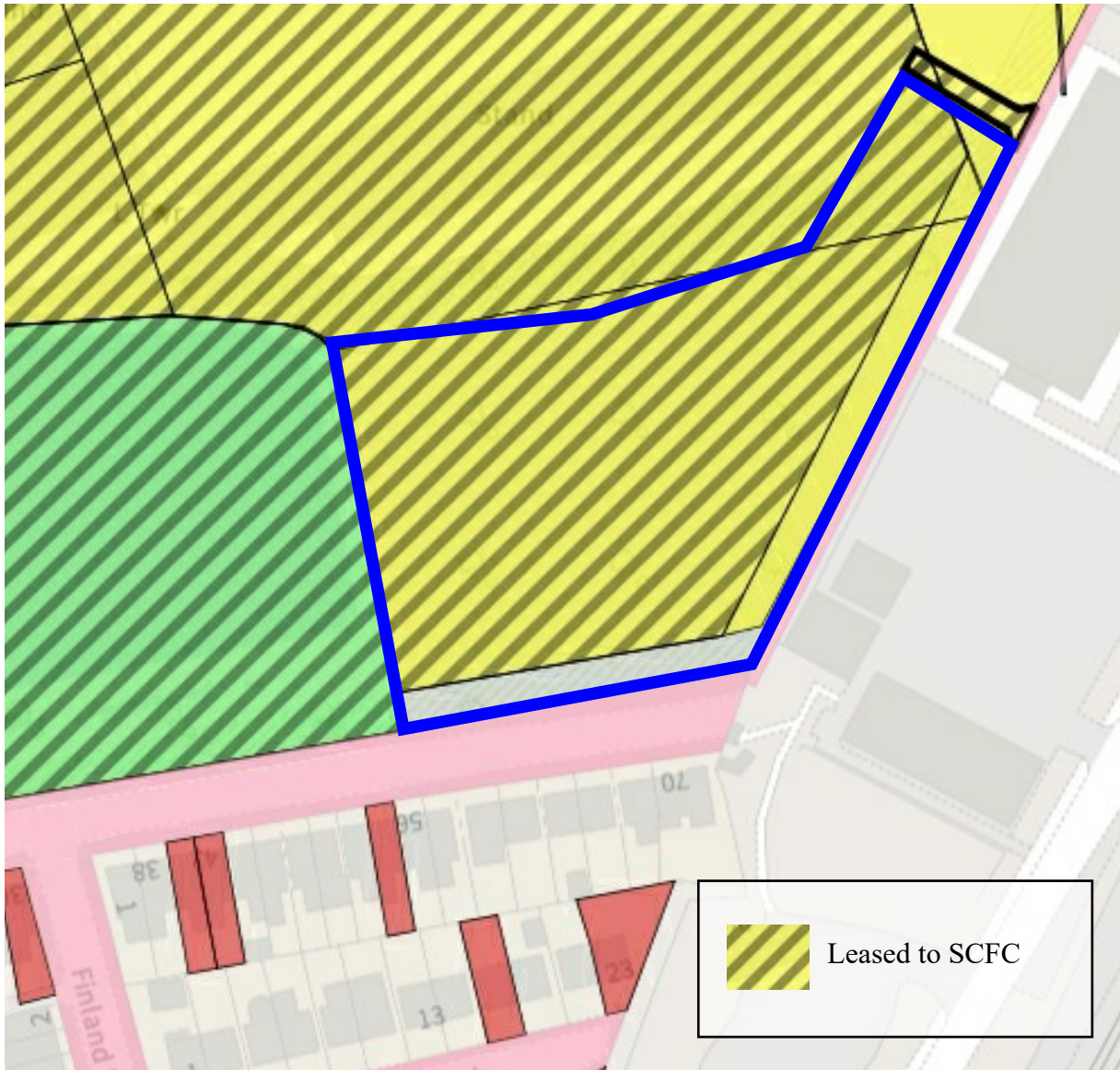


Note: This illustration is based upon the DETAILED_LANDSCAPE_MASTERPLAN-2300023 document supplied as part of the application by Asteer on behalf of SCFC

Note: in the original illustration as provided by SCFC with the planning application; EWR (marked here in blue) exists within a yellow boundary outline along with the proposed new south stand and is included as part of the Outline Planning Application part whereas the area within the red boundary outline is included as part of the Full Planning Application.

In Fig:2.3 below EWR is again defined by the blue outline.

Fig:2.3



BOUNDARIES MAP - SMBC (map.stockport.gov.uk)

Note: This illustration is based upon the boundaries map supplied by Stockport Metropolitan Borough Council at www.map.stockport.gov.uk

Note: According to SMBC two strips of EWR are not leased to SCFC. One along Moscow Road East to the south and one along the footpath to the east. (See Section 2.1.4. And Chapter **2.3.**)

Fig:2.4 below (from HM Land Registry) defines a titled area of land (GM545954) as defined by a red outline.

Fig:2.4b illustrates EWR in comparison.

Fig:2.4 Note: This is a copy of the title plan on 16 MAR 2024 at 03:51:02.

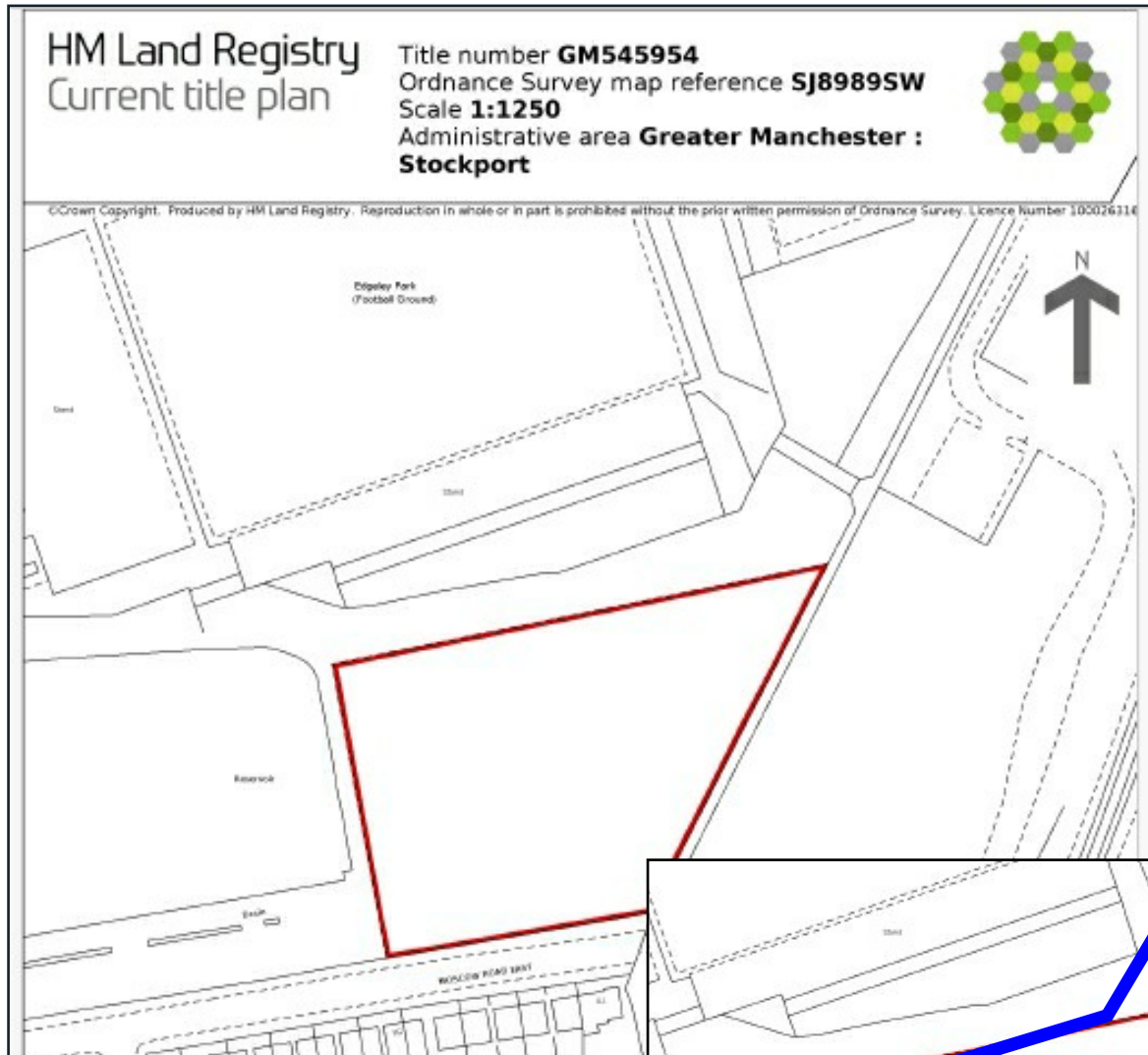
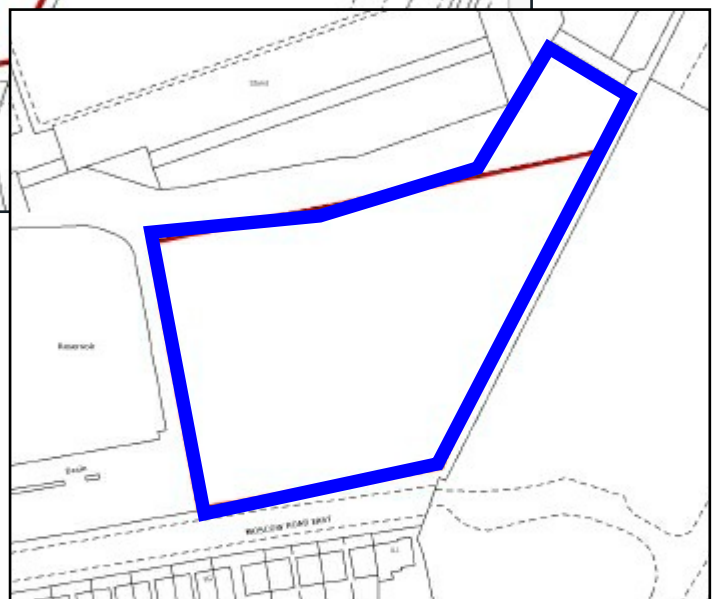


Fig:2.4b



2.1.2. Measurements of the Geographical Area Referred to as EWR

Using satellite imagery measurement tools it can be said that the area defined as EWR and marked with an opaque layer in Fig.2.1 has the approximate following dimensions:

<u>Area:</u>	<u>Perimeter:</u>
62,497 ft ²	1,095 ft
5,806 m ²	334 m
1.43 Acres	
0.5806 Hectares	

2.1.3. Lease of Land Encompassing EWR

A large percentage of the area defined as EWR is leased to SCFC.

However, as can be seen by observing Fig:2.3 (page 11), according to SMBC; two strips of the area defined as EWR and included within the Outline Planning Application are not leased to SCFC.

Clarification in regard to ownership, lease status or title easements should be made in regard to these strips in order for the public and any consultant agencies to make correct judgements, decisions and appeals.

It is, for instance, understood that a natural freshwater rivulet fed by springs and connected to the reservoirs and the wider river/water system runs through EWR along the line of both these boundaries recorded by SMBC as not leased to SCFC.

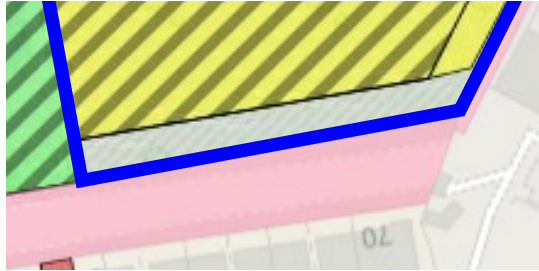
The public, United Utilities, Natural England, DEFRA and GMEU and other relevant bodies and consultancy agencies should all be informed/aware or made aware that this is the case before any decisions are made in regard to pursuing the Outline Planning Application any further.

More about the water system mentioned here is presented in Part 5: *Water, Drainage & Flooding*.

2.1.4. Measurements of the Unleased Strips

Using satellite imagery measurement tools it can be said that the southern strip area defined by SMBC at www.map.stockport.gov.uk as un leased and which is encompassed by the area defined as EWR has the approximate following dimensions:

<u>Area:</u>	<u>Perimeter:</u>
4,600 ft ²	416 ft
427 m ²	127 m
0.11 Acres	



Using satellite imagery measurement tools it can be said that the eastern strip area defined by SMBC at www.map.stockport.gov.uk as un leased and which is encompassed by the area defined as EWR has the approximate following dimensions:

<u>Area:</u>	<u>Perimeter:</u>
5, 575 ft ²	624 ft
536 m ²	190 m
0.13 Acres	



Conclusion (if SMBC mapping is correct): 52, 322 ft² (4,843 m²) is the area of land leased by SCFC.

2.1.5. The Land Leased by SCFC

The land leased by SCFC does/may not include a great portion of the land which planners are claiming is to be retained (southern strip area) by their plans.

If the owners of this land are SMBC or any governmental department or body with responsibilities relating to ecosystem; then planning frameworks (NPPF) and government policies and guidelines for legally binding strategies (Environment Agency, Defra) and legislation (The Environment Act 2021) and commitments (The CBD and 25 yr Plan) require that local authority consider the impact of the outline part of the planning application (DC/092211) upon the existing ecosystem, ecology and biodiversity of the wider area and upon areas that will remain (be retained) by the submitted plans.

For more about the impact upon ecosystem, ecology and biodiversity and related legally binding commitments and regulations see Part 3: *Ecology & Biodiversity*.

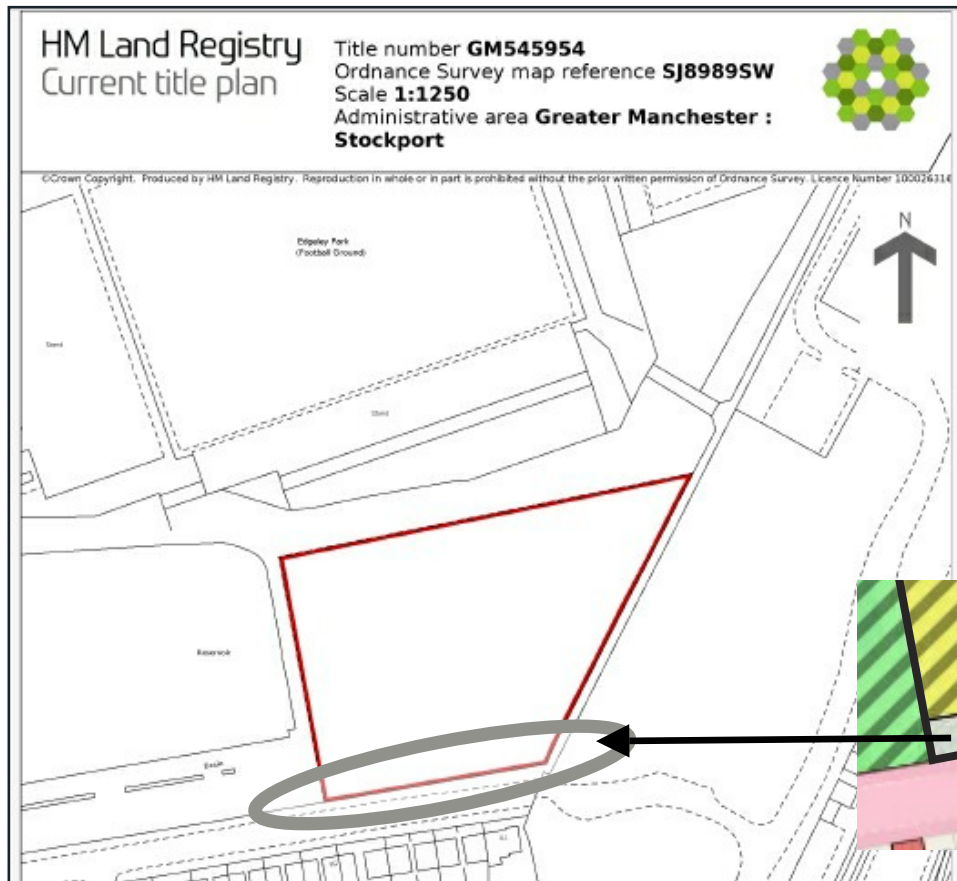
Fig:2.5



2.1.6. Ownership Information

The information supplied by HM Land Registry (boundary) in regard to GM54953 does not correspond with information at www.map.stockport.gov.uk

In regard to legally binding expectations explained in 2.1.5. any inaccuracies or oversights in council mapping (or display of mapping) or land ownership irregularities or special considerations (such as the easements connected with this land) should be identified before decision is made upon the outline part of the planning application DC/092211.



The grey shaded area infers the southern strip area is not council owned (according to the key on the council map web pages).

Land Information

Council owned land

Committee: Corporate

Title Number(s): GM545954, GM510433

Lease Information

Lease I.D: LP43 / Lease

Tenant: Stockport County 2010 Ltd

Lease Type: Leases granted by SMBC

Property leased: Sport centre / Pool / Stadium

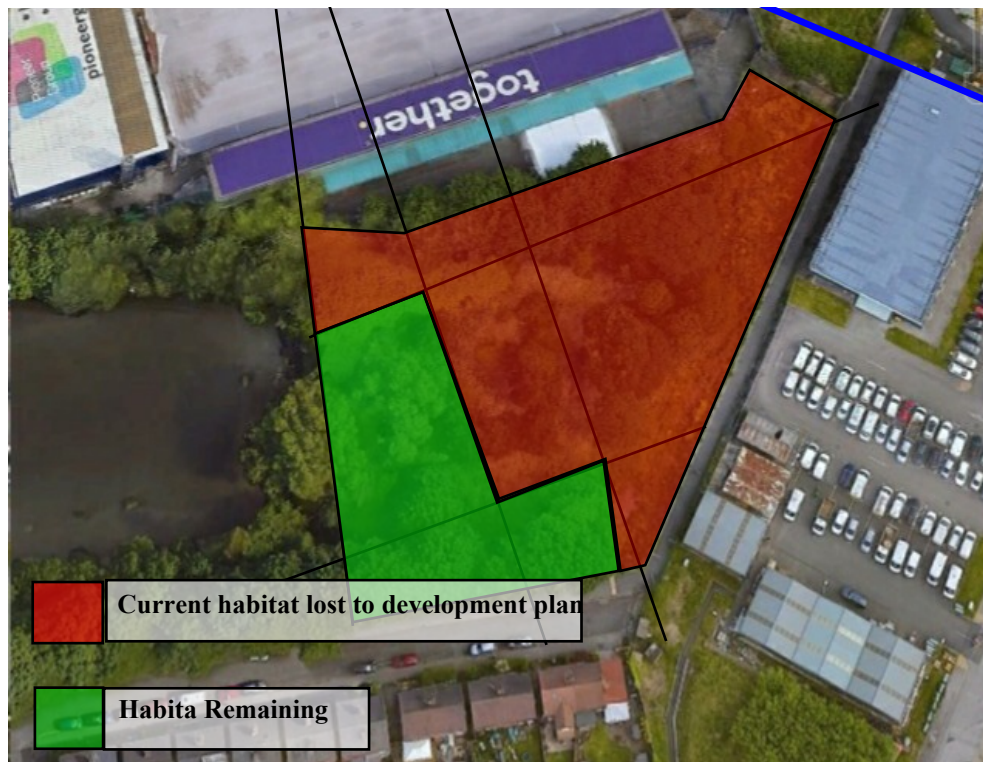
Property Type: Commercial property Investments

2.2. Habitat Lost and Remaining

Using satellite imagery measurement tools it can be said that the habitat area of EWR set to be lost according to the outline part of the planning application DC/092211 is as follows:

2.2.1. Habitat Lost

	m	ft	He	Acre
Perimeter:	327	1,072		
Area:	4,352 ²	46,845 ²	0.44	1.1



2.2.2. Habitat Remaining

	m	ft	He	Acre
Area:	1,454 ²	15,652 ²	0.14	0.3

33.4% of EWR's current wildlife habitat will remain and 66.6% will be lost.

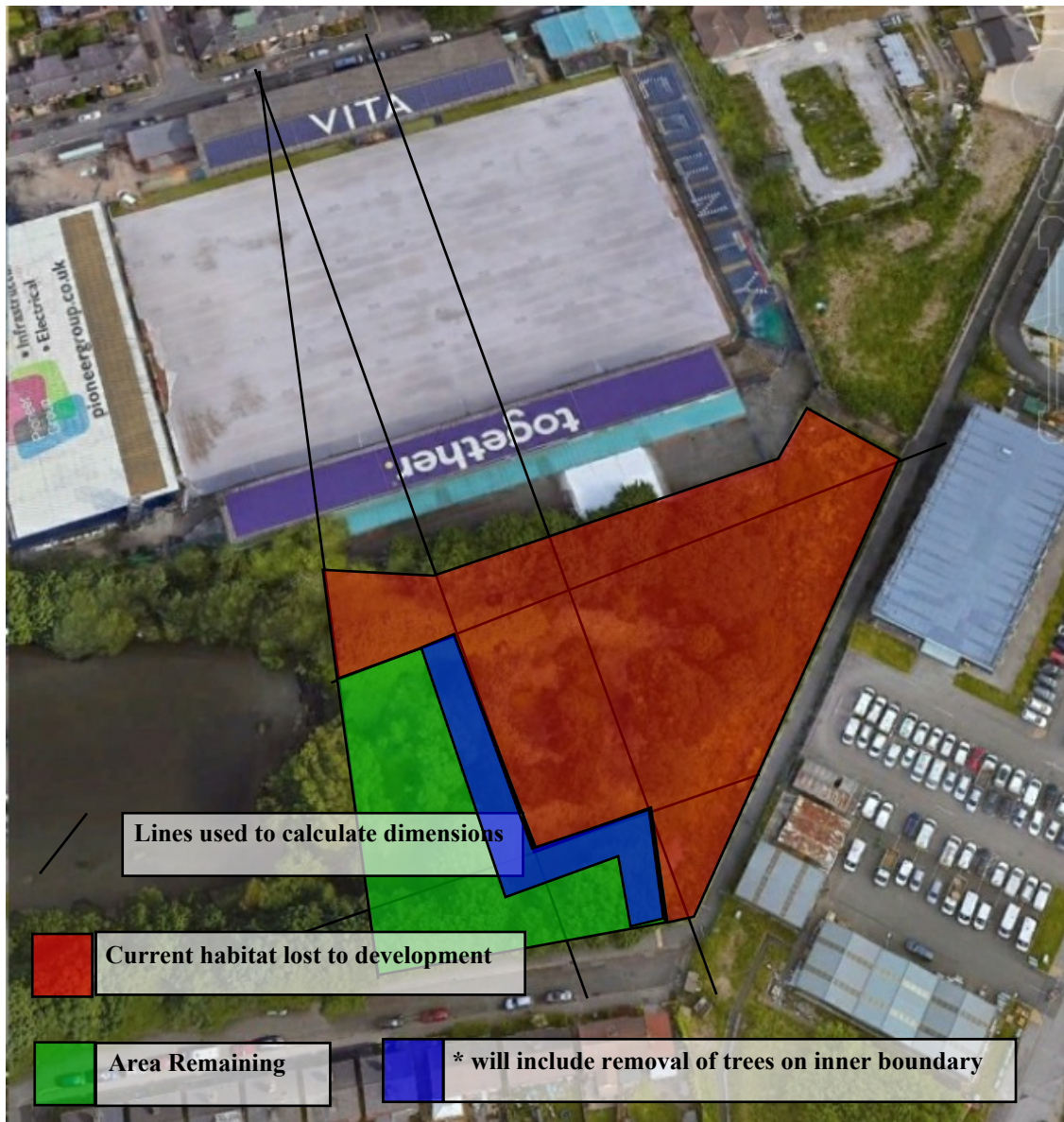
As it stands today EWR comprises of 40% of Edgeley's meaningful (in size), secure and safe space in terms of wildlife habitat. If we lose a third of EWR :

We will lose 27% of Edgeley's overall wildlife habitat.

Along with that potentially a huge % of our WILDLIFE!

2.3. Retained Section Border Loss

Further to the loss/remain border calculations illustrated in 2.2. further loss to habitat will be incurred. In order to avoid tree fall (fruits, branches, etc) falling onto parked cars, developers intend to fell trees and vegetation within the 'retained' section. The extent of this is not adequately illustrated in plans. An approximate indication of the extent is illustrated in blue below.



Less than 33.4% of EWR's current wildlife habitat will remain and more than 66.6% will be lost.

As it stands today EWR comprises of 40% of Edgeley's meaningful (in size), secure and safe space in terms of wildlife habitat. If we lose a third of EWR :

We will lose more than 27% of Edgeley's overall wildlife habitat.

2.4. Area Actually 'Retained' by the Leaseholder

The following illustration shows area to be lost (red), approximate area lost in addition within retained section (blue), area to remain (green) and areas possibly not even leased to SCFC. (yellow).

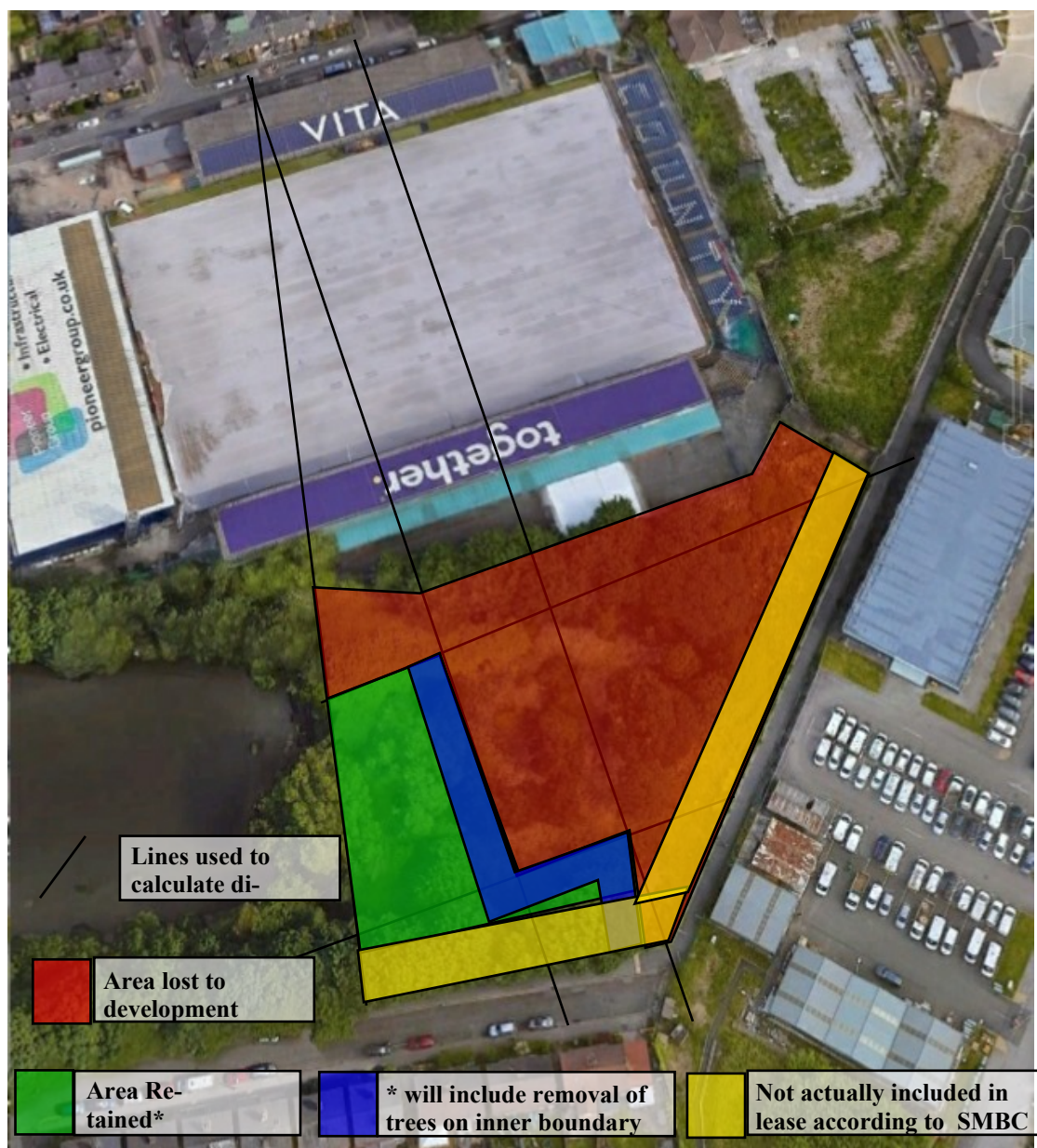
According to this illustration the club's plans are actually only responsible for 'retaining' approximately :
 $1,126 \text{ m}^2 / 12,121 \text{ ft}^2$ of the $1,454 \text{ m}^2 / 15,652 \text{ ft}^2$ that will remain.

Of that remaining $1,454 \text{ m}^2 / 15,652 \text{ ft}^2$ an approximate further $328 \text{ m}^2 / 3,531 \text{ ft}^2$ of tree canopy (as well as the trees themselves) could be lost within the border to protect cars.

The area of habitat that the club's plans are offering to 'retain' is more realistically described as approximately :

$1,126 \text{ m}^2 / 12,121 \text{ ft}^2$

How that looks is illustrated on the following page.



2.5. The Last Accessible Vestige of Wildlife Habitat in Edgeley plus a Line of Trees







