

Part 7: ALTERNATIVES (in Design & Implementation)

Other parts of this document:

Part 1: INTRODUCTION
Part 2: BOUNDARIES
3. ECOLOGY AND BIODIVERSITY
Part 3.b: VISUAL EVIDENCE
Part 4: COMMUNITY, HEALTH & EDUCATION
Part 5: WATER, FLOODING & DRAINAGE
Part 6: CONSERVATION AREA
Part: 8: CONCLUSIONS

Introduction

This part (Part 7: *Alternatives*) argues against the outline part of the planning application (Ref # DC/092211) on the grounds that there are alternatives (in regard to design and implementation of traffic and parking facilities) to a car park being constructed upon EWR, and also alternatives to that particular car park per se.

Edgeley Wildlife Reserve Group object to plans to develop the land defined by this document as *EWR* (see Part 1: *Introduction* & Part 2: *Boundaries & Measurements*) or any disturbance or landscape changes to that land for the purpose of development south of the stadium on the basis of the points raised in all the parts of this whole document.

Part 3 (*Ecology & Biodiversity*) focuses upon legally binding commitments to halt the decline of nature in the UK. Some of those commitments which are in consideration of sustainable transport and planning in the context of transport are revisited in this part (Part 7). This part adds to the argument against a car park on the basis that design and implementation alternatives exist regarding the section of car parking to the south of the stadium. Re-design at architectural level, use of existing car parks within walking distance, agreements with existing car parks, park and ride, the encouragement of use of public transport, and a change in the club's parking priorities, should all be considered.

Sections referring to the text of regulations, guidelines and legislature are included as essential to the representation of this objection and in support of the creation of a nature reserve. All parts, chapters, sections and paragraphs of this document should be considered relevant. Content on one page often informs arguments and statements on other pages.

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7.1. Declarations and Commitments by Authorities

A Biodiversity Emergency was declared by Manchester Combined Authority in 2022.

Global and national findings and data and associated reports are relevant to this planning application because the commitments made and signed in regard to the Biodiversity Emergency recognize that change to protect, recover and avoid destruction of natural habitat can only begin at local levels. It is therefore important to understand the context of Stockport's potential in making a difference not only locally but also nationally and globally.

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, wellbeing and education which in turn have a positive and long lasting impact on economy. Some, such as more sustainable transport, have a more immediate and obvious effect on the economy.

In the case of this Outline Planning Application (Part of Hybrid 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. Edgeley is an area deprived of access to natural habitat.

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. The consideration of alternatives to the planned car park must be considered by local authority.

7.2. Commitments - National

Part 3: (*Ecology & Biodiversity*) of this document covered legally binding commitments which national and local authority are duty bound to honour. Some of them are directly related to sustainable transport. This section revisits some of the legally binding commitments which are focused upon sustainable transport and those impacts of development upon biodiversity which are related.

For more in-depth detail about local authority obligations regarding legally binding commitments to improving biodiversity see Part 3: *Ecology & Biodiversity*.

The UK has made commitments to reducing biodiversity loss in England. *The Environment Act 2021* includes legally binding targets for the government to help the UK meet its international commitments and has agreed to and signed the *International Convention of Biological Diversity (CBD)*. Each country's commitments will be monitored through updated National Biodiversity Strategies and Action Plans. Countries will also submit national reports on progress to the CBD's governing body in 2026 and 2029.

7.2.1. Convention for Biological Diversity (CBD)

Ratified by 196 countries, the CBD is an international treaty for the conservation of biological diversity. The CBD was agreed in 1992 and has seen nearly every country in the world become a party to it. The UK brought the CBD into force in 1993. This put the UK government under a legal obligation to protect biodiversity in its territories.

The CBD set goals to halve biodiversity loss by 2020. Meeting the targets failed and no country (including those of the UK) achieved the ambition of halving biodiversity loss. In 2020, in its *Global Diversity Outlook Report*, the CBD concluded that to reach targets by 2050 specific areas need addressing as a priority.

The difficulties in addressing biodiversity loss were reflected in the UK's 2019 report on progress. It found that the UK had only fully met five of the 20 targets. The Royal Society for the Protection of Birds (RSPB), a nature conservation charity, concluded in 2020 that governments across the UK fell most short of the targets "*which actually make a difference for species or habitats*", calling the 2010s a "*lost decade*" for nature.

In order to reverse the trend of failing to meet targets to which national and local government is committed, opportunities need to be identified. This cannot be done, targets cannot be met, habitat can not be protected or restored, the shocking demise of species and habitats in Britain cannot be reversed, without adequate action, policy and decision making at local level.

The Environment Act 2021 targets are supported by a series of interim targets (to 2028), as set out in the government's *2023 Environment Improvement Plan*. However the environmental watchdog, the Office of Environmental Protection, concluded in January 2024 that "as

things stand the prospects of meeting key targets and commitments are largely off track” for biodiversity. This was because many policies were still in development.

As nature conservation is a devolved policy area, Scotland, Wales and Northern Ireland have their own biodiversity targets and strategies. The four UK administrations published a joint UK Biodiversity Framework in May 2024, which aims to coordinate efforts to meet the UK’s international obligations.

Biodiversity loss: The UK’s international obligations. <https://commonslibrary.parliament.uk/biodiversityloss-uk-international-obligations/> Published Thursday, 11 July, 2024

Interim Targets

Interim targets have been set according to the categories listed below. These should be of concern to planners and decision makers. **Full details of ALL the interim targets and their detail in relation to EWR are found in Part 3: Ecology & Biodiversity (p.15-p.60)**, and those which relate to community, health and education are also covered in Part 4: *Community, Health & Education*.

i. Reducing threats to biodiversity

TARGET 1: Plan and Manage all Areas To Reduce Biodiversity Loss

TARGET 2: Restore 30% of all Degraded Ecosystems

TARGET 3: Conserve 30% of Land, Waters and Seas

TARGET 4: Halt Species Extinction, Protect Genetic Diversity, and Manage Human-Wildlife Conflicts

TARGET 6: Reduce the Introduction of Invasive Alien Species by 50% and Minimize Their Impact

TARGET 7: Reduce Pollution to Levels That Are Not Harmful to Biodiversity

TARGET 8: Minimize the Impacts of Climate Change on Biodiversity and Build Resilience

ii. Meeting people’s needs through sustainable use and benefit-sharing

TARGET 9: Manage Wild Species Sustainably To Benefit People

TARGET 10: Enhance Biodiversity and Sustainability in Agriculture, Aquaculture, Fisheries, and Forestry

TARGET 11: Restore, Maintain and Enhance Nature’s Contributions to People

TARGET 12: Enhance Green Spaces and Urban Planning for Human Well-Being and Biodiversity

TARGET 13: Increase the Sharing of Benefits From Genetic Resources, Digital Sequence Information and Traditional Knowledge

TARGET 14: Integrate Biodiversity in Decision-Making at Every Level

iii. Tools and solutions for implementation and mainstreaming

TARGET 15: Businesses Assess, Disclose and Reduce Biodiversity-Related Risks and Negative Impacts

TARGET 16: Enable Sustainable Consumption Choices To Reduce Waste and Overconsumption

TARGET 18: Reduce Harmful Incentives by at Least \$500 Billion per Year, and Scale Up Positive Incentives for Biodiversity

TARGET 22: Ensure Participation in Decision-Making and Access to Justice and Information Related to Biodiversity for all

Those legally binding targets relevant to this part (Part 7: *Alternatives*) are covered below:

7.2.1.a. Interim Targets (CBD)

The legally binding interim targets included below are only those of a wider list which bear relevance to the outline part of the planning application DC/092211. They are included here based upon their relevance in **encouraging** traffic/transport/parking **alternatives**. The full list of interim targets and how they apply to the outline part of the planning application DC/092211 can be found in Part 3: *Ecology & Biodiversity*.

TARGET 1: Plan and Manage all Areas To Reduce Biodiversity Loss

This interim target is concerned with addressing biodiversity loss in regard to planning and managing all areas. As far as authority is concerned, the ward is the basic building block of the organised local authority organised system. It is also at ward level where local community is directly effected.

Recognising that land-use change is a major driver of biodiversity loss, this target pays regard to the importance of cross-sectorial approaches in consideration of interests, values and types of land-use with local community in mind.

This commitment dictates that:

- a) authority, identify the existing biodiverse nature of habitats such as EWR and consider it in spatial-planning
- b) assess the existing biodiverse nature of habitats such as EWR within a (relative) environmental setting in order to allocate land-use and relative balance of land-use within that environmental setting.
- c) authorities use the ecosystem approach to prioritise land-use within measured environmental settings, including the need to safe-guard nature, food security and human well-being.

Where EWR is concerned, the ecosystem approach in regard to the relevant environmental setting would recognize the existing habitat consists of not only woodland, grassland and scrub, but is connected ecologically to a reservoir system as a food and secure refuge habitat and in terms of water systems. The approach would also recognize that EWR is the largest and arguably the only such habitat within the boundary of the existing ward.

TARGET 2: Restore 30% of all Degraded Ecosystems

This interim target is concerned with restoring nature in degraded habitats. The aim is to enhance (improve) existing but degraded habitats and ecosystems. EWR is ecologically connected to the local reservoir system and to the wider water infrastructure.

Previously existing as a natural habitat comprising of a rivulet fed by fine white sand springs EWR was degraded by human development in the early nineteenth century.

For the last few decades, nature has reclaimed EWR and though it remains degraded due to subterranean urban footprints in parts, it is classified as woodland, scrub and grassland by ecologists. It is, as far as the current state of nature, and these targets go, already a success story.

Destroying such a success story which can contribute toward committed targets, would be contrary to those targets agreed to by authority and contribute toward the decline of the state of nature in the UK. Recognising that natural water is an important resource, among other things, Edgeley Wildlife Reserve Group would seek examining the feasibility of opening up the currently piped spring water rivulet to provide further habitat (such as the introduction of reed beds) for species and to enhance the existing Ecosystem.

In regard to 'trade-offs to consider', the argument against a car park upon EWR is the subject of this part - Part 7: (*Alternatives*).

TARGET 4: Halt Species Extinction, Protect Genetic Diversity, and Manage Human-Wildlife Conflicts

This interim target is concerned with conflicts between wildlife and human activity and with species extinction and protecting genetic diversity. Section 3.0 (*State of Nature Report*) of this part (*Ecology and Biodiversity*) is relevant to understanding the relevance of species abundance and decline. As well as particular species threatened by extinction, the target committed to, aims to improve the recovery and conservation of **all species**. Decline of habitat leads to decline of abundance which in the long term leads to extinction risk.

Species Example; House Sparrows are classified in the UK as Red under the *Birds of Conservation Concern 5: the Red List for Birds (2021)*. Priority Species under the *UK Post-2010 Biodiversity Framework*. House Sparrows nest in the roof tops of houses along Moscow Road East and use EWR daily to forage for food and nesting material.

Species 'Habitat Example; European Hedgehog are protected in the UK under the *Wildlife and Countryside Act, 1981*. Priority Species under the *UK Post-2010 Biodiversity Framework*. The nature of decades old landfill forming uneven ground protected by bramble (scrub) and mergence with decaying organic matter (soil) of parts of EWR offer excellent hibernation locations and foraging opportunities for hedgehogs.

British birds of conservation concern also include: Swifts, Herring Gulls, Starlings (Red Listed); Wood pigeon, Black Headed Gull, Common Gull, Sparrowhawk, Willow Warbler, Wren, Song Thrush, Dunnock (Amber Listed) - all of which have frequented (some permanently) EWR.

Maintaining and restoring genetic diversity of species, in order to avoid decline of abundance leading to threat of extinction, requires adequate and secure habitat. Particularly habitat which is considered connected to, or potentially can be connected to, other areas of local and wider ecosystems.

Destroying, fragmenting and/or minimising the size of EWR's existing woodland, scrub and grassland habitat which is also important to the local ecosystem of reservoirs and the wider ecosystem through

water networks (see Part 5: *Water, Drainage & Flooding*) and potentially officially designated green corridors provided by railway embankments, to construct a car park, is detriment to all aspects of this target and will introduce rather than minimize human-wildlife conflict.

As more ecological and environmentally friendly alternatives to a car park upon EWR exist, humanwildlife conflict can be avoided through appropriate planning and re-design at architectural level.

It should also be noted that a great deal of the UK's red and amber listed birds are aquatic (water based) and wetland/marsh birds and reducing the natural buffer zone at the reservoir's edge which EWR provides along with its potential to provide wetland habitat and reedbeds will not increase the likelihood of attracting such birds.

TARGET 7: Reduce Pollution to Levels That Are Not Harmful to Biodiversity

A car park constructed upon EWR risks pollution and degradation of the planned 'retained' section and the water system, including the reservoirs, in various ways. The construction phase risks contamination of EWR and related natural spring water course by dust and hazardous materials.

After construction, risks include: loss of nutrients from existing soil; pest poisons; weed pesticides; litter; clogging of water course by litter; overflow contaminating water course; drainage contaminating water course; plastic and tin pollution; takeaway food wrappers; and, heavy footfall and vehicular presence risks and light and noise pollution devaluing remaining habitat value.

It can be noted that as far as Edgeley Wildlife Reserve Group are aware there have been no efforts by SCFC to remove litter from EWR over the course of three years. Two litter picks were carried out by members of EWRG in the last 18 months which transformed the area.

TARGET 8: Minimize the Impacts of Climate Change on Biodiversity and Build Resilience

The overall objective of this committed target is to reduce from all sources the impacts of climate change on biodiversity and also to build resilience. Reducing risks and integrating preventative decisions can begin at local level with consideration of EWR's current and potential significance in contributing to providing habitat which is currently 'environmentally friendly' and 'carbon efficient'.

Raising atmospheric carbon dioxide concentrations by encouraging driving together with the loss of existing habitat space is not compatible with minimizing the impacts of climate change but rather contributes to it. Minimizing impact of climate change upon biodiversity using ecosystem based approaches would consider alternatives to the destruction of EWR for the construction of a car park in view of alternatives (appropriate re-planning and re-design at architectural level and use of one car park less than planned) existing.

TARGET 12: Enhance Green Spaces and Urban Planning for Human Well-Being and Biodiversity

This interim target, focuses upon the enhancement of green-spaces and urban planning for the benefit of human well-being and biodiversity. It has been agreed to and committed to by UK government.

The aim of this interim target is to significantly increase the area, connectivity of, access to, and benefits provided by natural urban green and blue spaces. Furthermore, this commitment states the importance of enhancing (as opposed to mitigating or compensating for the loss of) native biodiversity.

Green and blue spaces have a range of positive effects on human physical and mental well-being. Ensuring the availability and accessibility of such areas is particularly important given that the increasing trend towards urbanization risks separating people further from nature, with potential negative effects on human health and reduced understanding of biodiversity, and the ecosystem services it provides.

In Edgeley, only enhancing existing, or providing more, not less, meaningful natural green space can provide important habitat for species, improve habitat connectivity and provide adequate ecosystem services.

Reducing the environmental footprint of cities and infrastructure cannot be achieved by providing car parks upon the last remaining natural green spaces of communities when alternatives exist. Spatial planning at local authority level is called to recognise that making space for nature within built landscapes will improve the health and quality of life for citizens.

The target specifically calls for the area, quality, connectivity, accessibility and benefits from such areas to be increased for the purposes of enhancing native biodiversity, ecological connectivity and integrity, and improve human health and well-being and connection to nature.

Edgeley Wildlife Reserve Group seek the recognition, designation, protection, restoration and enhancement of Edgeley's largest and only natural green space of any meaningful significance according to this target.

The accomplishment of an enhanced gated nature reserve accessible to people upon EWR as it is (in size) will satisfy elements of this target, namely: quality, connectivity, accessibility and benefits increased for the purposes of enhancing native biodiversity, ecological connectivity and integrity, and improving human health without degrading the element of 'area'.

TARGET 14: Integrate Biodiversity in Decision-Making at Every Level

This interim target aims to ensure that the government's commitments to biodiversity and its values are fully integrated into all policies, regulations, planning, development processes, strategies, and environmental assessments across all sectors and levels of government, local and national.

The aim of this target is also to align biodiversity relevant decision-making with the framework provided by the goals and targets committed to by UK government in order to ensure that the diverse values of biodiversity and the opportunities derived from its conservation and sustainable use are recognized and reflected in decision-making.

It is important therefore, indeed the CBD refer to it as critical, that for the purpose of achieving committed targets and improving biodiversity concerns with adequate measures and decisions that local government, such as SMBC, integrate these committed targets across all planning departments, policies and programmes/strategies.

“Implementing this target is critical for implementing the objectives of the Convention.”

Designated accordingly as a nature reserve and enhanced, EWR offers multiple values (biodiversity services) in education, health and well-being, employment, local food production, cultural & spiritual needs, and scientific study. It will also contribute toward meeting targets set to stem the local, national and global biodiversity crisis across a range of factors established by the targets committed to by government in Part 3: *Biodiversity & Ecology*.

“..biodiversity has multiple values, some of which can be quantified in monetary terms and others that are more abstract.”

Various decision-making frameworks guide activities at global, national and local scales and in the private and public sector. However, these frameworks often do not appropriately account for biodiversity or its values, and therefore these are not always appropriately reflected in relevant processes, including regulations, planning and development processes, poverty eradication strategies, strategic environmental assessments, environmental impact assessments and, as appropriate, national accounting.

Therefore, these targets, in relevance to this planning application, are applicable to a number of departments, policies, regulations, processes, strategies, assessments and accounting, comprised within SMBC for the purpose of contributing toward achieving the biodiversity relevant goals pursuant to commitments by UK Government.

TARGET 15: Businesses Assess, Disclose and Reduce Biodiversity-Related Risks and Negative Impact

According to Target 15, Stockport County Football Club should be encouraged to recognise and disclose that access to nature is a community asset for a number of reasons pursuant with these targets and as far as Edgeley is concerned the only reasonable biodiversity asset of any meaningful scope and is currently (due to the lease agreement) an ecosystem and set of sub-systems at risk of serious impact in terms of biodiversity loss, local and national, pursuant to these targets committed to by UK Government.

TARGET 16: Enable Sustainable Consumption Choices To Reduce Waste and Overconsumption

In the case of the planned car park upon EWR, promoting public transport and the use of existing car parks and initiating park and ride schemes should be encouraged and enabled in order to satisfy this target commitment.

The Convention of Biological Diversity signed by UK Government, states that the establishment of support policy, legislative or regulatory frameworks should improve access to alternatives leading to the reduction of global footprint by 2030.

Only by local authority action leading the way according to and relating to local issues can the nation meet targets.

Public transport is one of the best, most cost-effective solutions available to address today's climate and development challenges.

Buses and trains can reduce greenhouse gas (GHG) emissions by up to two-thirds per passenger, per kilometer compared to private vehicles. The UN's latest climate action report says that shifting more trips to public transit is "essential" to curbing climate change. At the same time, increasing access to reliable public transport brings important benefits to society, such as lower traffic fatality rates, more active city residents and broader access to jobs, education and urban services. This makes it a key driver of equitable, sustainable development in cities around the world.

<https://www.wri.org/insights/current-state-of-public-transport-climate-goals>
WORLD RESOURCES INSTITUTE

TARGET 18: Reduce Harmful Incentives by at Least \$500 Billion per Year, and Scale Up Positive Incentives for Biodiversity

This target is concerned with the removal from policies or practices (at all levels) of incentives which induce unsustainable behaviour that is harmful to biodiversity, often as unanticipated (and unintended) of policies designed to attain other objectives).

SMBC are duty bound to legally binding commitments to remove negative incentives ('perverse incentives') from policies and practices.

In regard to planning application DC/092211, decision makers should establish whether any incentives or subsidies exist or might arise between authority and applicant which can be related to these development plans.

Such existing 'perverse incentives' might include the leasing of land based upon economically driven ideas which have not fully considered biodiversity impact, and for a non transparent 'subsidised' amount.

It could also be considered that offering fragmented and piecemeal planting of trees as 'habitat' in harsh urban environs conflicted by noise and light pollution and heavy footfall is a 'perverse incentive' for the removal of an area of existing natural habitat.

Arising 'perverse incentives' might include, for example, a response from the applicant to the ideas contained within this document, attempting to offer the installation of community growing plots else-

where on-site (or off-site) in order to gain positive outcome in decision making in regard to establishing a car park upon EWR.

A positive incentive would be (for example) offering discounted tickets for use of public transport or selling tickets combined with an existing car parking slot in an already existing car park within walking distance. A positive incentive might also include subsidized park and ride schemes from already existing car parks.

7.2.2. The Environment Act 2021

According to The Environment Act 2021, '*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 Section 1.

According to the government, pursuant to The Environment Act 2021 and legally binding targets set out by the Convention for Biological Diversity; utmost importance is placed upon commitment to strategies for the recovery of nature in the UK. Additional (as opposed to mitigated or compensated) wildlife habitat is to be considered through changes in the way land is managed.

PART 1, CHAPTER 1, Environmental targets, Section 1,

Environmental improvement plans

(7)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 Environment Act 2021

'A Green Future: *Our 25 year Plan to Improve the Environment*' is to be treated (by government at all levels) as an environmental improvement plan. This plan is examined in detail in the next section.

7.2.2.a. A Green Future: Our 25 year Plan to Improve the Environment

According to the government, pursuant to The Environment Act 2021 and legally binding targets set out by the Convention for Biological Diversity; utmost importance is placed upon commitment to strategies for the recovery of nature in the UK. Additional (as opposed to mitigated or compensated) wildlife habitat is to be considered through changes in the way land is managed.

This 25 Year Environment Plan sets out government action to help the natural world regain and retain good health. It aims to deliver cleaner air and water in our cities and rural landscapes, protect threatened species and provide richer wildlife habitats. It calls for an approach to agriculture, forestry, land use and fishing that puts the environment first.

Respecting nature's intrinsic value, and the value of all life, is critical to our mission. For this reason we safeguard cherished landscapes from economic exploitation, protect the welfare of sentient animals and strive to preserve endangered woodland and plant life, not to mention the greening of our urban environments

RN: 25yr Plan, p6

The government has recognised ‘four Grand Challenges’ where environment and industry meet. Two of those bearing direct relevance, are:

- Clean Growth – maximising the advantages of UK industry from the global shift to clean growth.
- Future of Mobility – becoming a world leader in the way people, goods and services move.

Environmental protection is at the heart of the strategy, as our Clean Growth Grand Challenge shows, and is also evident in our investment in clean innovation, the support for zero-emission vehicles, and measures to tackle local air pollution.

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 a ‘natural capital’ approach as a tool to help us make key choices and long-term decisions.

RN: 25 yr plan, p19

7.2.3. National Planning Policy Framework (NPPF)

NPPF and the outline part of planning application DC/092211

The National Planning Policy Framework sets out the government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans can provide for sufficient housing and other development in a **sustainable manner**. Preparing and maintaining up-to-date plans should be seen as a priority in meeting this objective.

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.

NPPF, 2023, p4

Any planning policies and decisions must reflect the international obligations and statutory requirements described in Part 3 of this document: *Ecology & Biodiversity (3.1. Commitments - National)*.

Part 4: (*Community, Health & Education*) of this document revisits the planning policies listed in this section directly related to health, wellbeing and community cohesion in more detail.

All of the relevant planning policies are found in more depth in Part 3: *Ecology & Biodiversity (3.1.4.d. p102)*. This section includes summaries of some of those.

Achieving sustainable development

At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs

NPPF, 2023, p5

Meeting the needs of the present without compromising the ability of future generations to meet their own needs requires consideration of access to true natural space, the preservation of true natural space and the protection and designation of true natural spaces, especially in urban environments. (See Part 3: *Ecology & Biodiversity (Chapter 3.2.)* and Part 4: *Community, Health and Education*).

Strong, vibrant and healthy communities require access to true natural spaces. Sometimes true natural spaces are available in the right places at the right time and can be rare in urban areas such as Edgeley. Once local access to true natural spaces are taken by urban development they may never reappear and opportunities which can benefit local communities are lost for ever. (See Part 4: *Community, Health and Education*).

Sustainable solutions would include protecting and enhancing natural environment according to legally binding commitments (See Part 3: *Ecology & Biodiversity* (Chapter 3.2.)) and not mitigating or compensating for its destruction. Local circumstances in Edgeley dictate a need for access to natural green space (as opposed to managed open parks for human recreation) and such spaces should be protected.

The presumption in favour of sustainable development

The promotion of a sustainable pattern of development would make allowances for areas of natural habitat where areas of natural habitat are rare and where there is a need for access to it. Ecosystem service in Edgeley is at bare-bones level and the local community would benefit by the protection, designation and enhancement of existing habitat as well as improving and creating more natural environment (in terms of wildlife habitat) to enable a boost in terms of wellbeing, health, education and social cohesion. (See Part 4: *Community, Health & Education*).

In the context of Edgeley, EWR (as an area of habitat) 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 NPPF 2023, EWR should be considered as an asset warranting protection.

Plan making - Strategic policies

The strategic policies for Stockport should consider the presence of natural spring fed rivulets and their ecological importance to neighbouring reservoirs and the wider river systems. It should be considered in terms of water infrastructure as well as in ecological terms. Where cellars of streets running parallel with reservoirs are subject to serious flooding, the impact of sloping car parks and the effect of the removal of woodland and vegetation (roots) on water tables and on natural spring fed rivulets should be considered. (See Part 5: *Water, Drainage & Flooding*)

Plan making - Non-strategic policies

The non-strategic policies for Stockport's specific areas should consider the presence of a natural spring fed rivulet in EWR and its ecological importance to the neighbouring reservoirs and the wider river systems. It should be considered in terms of water infrastructure as well as in ecological terms. The cellars of the houses on the street running parallel with the reservoirs are subject to serious flooding. The impact of a sloping car park and the effect of the removal of woodland and vegetation (roots) as a result of the outline part of this planning application (Ref: # DC/092211) on water tables and on natural spring fed rivulets should be considered. (See Part 5: *Water, Drainage & Flooding*)

This document (parts related to the protection, designation and enhancement of EWR as a nature reserve) can be considered as the basis for, or contribution toward, the shaping of a neighbourhood plan. See Part 3: *Ecology & Biodiversity* (Sections 3.1.4.h. and 3.1.4.i.).

Plan making - Preparing and reviewing plans

In regard to the outline part of the planning application (Ref: # DC/092211); environmental (in the case of loss of wildlife habitat, flooding and risk to water bodies) and social impacts (in the case of losing Edgeley's only reasonable space giving access to true natural habitat and resulting ecoservices) can be avoided and alternative options are available to consider which will reduce and eliminate those impacts. See Part 5: (*Water, Drainage & Flooding*) and Part 7: (*Alternatives*).

Plan making - Examining plans

Local plans and spatial development strategies should have assessed that the local area (Edgeley) is deprived of access to true natural habitat. The outline part of the planning application (Ref: # DC/092211 - development of a car park to the south) involves permanently removing the last reasonable vestige of natural habitat in Edgeley and along with it the chances of establishing ecoservices which access to true natural habitat can offer in contribution to health, wellbeing and social cohesion for many people over many generations.

Local plans and spatial development strategies should identify that reasonable alternatives to the car park would involve convincing, encouraging or incentives; for use of public transport for an average perceived figure of 150-200 out of 19,750 people. See Part 4: (*Community, Health & Education*) and Part 7: (*Alternatives*).

Decision Making Pre-application engagement and front-loading

The environmental impact assessment and flood risk assessment in regard to the outline part of the planning application (Ref: # DC/092211) were not thoroughly informed and wider impacts and implications of developing the area have not been examined. The existing quality and potential scope of the area of EWR in regard to ecological surveying was lacking. Neither was the lone representation of EWR 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. See Part 3: *Ecology & Biodiversity* (Sections 3.1.4.h. and 3.1.4.i.) and Part 5: (*Water, Drainage & Flooding*).

Decision making - Determining applications

There is no published/completed Local Plan, Local Nature Recovery Strategy or Biodiversity Action Plan. Therefore it must be assumed that these plans are emerging. Likewise, the outline part of the planning application (ref:# DC/09221) does not consider adequately the effect it would have upon local biodiversity (for reasons mentioned in this document as a whole) or alternatives which emerging Local Plans, Local Nature Recovery Strategies and Biodiversity Action Plans are obliged to consider to meet legally binding commitments.

Decision making - Tailoring planning controls to local circumstances

It is necessary to protect Edgeley's last vestige of accessible true natural habitat of reasonable size for reasons relating to legally binding commitments to biodiversity and for the health, wellbeing, educational

opportunities and social cohesion of the Edgeley community and surrounding areas, the latter reasons also encompassed by legally binding commitments to biodiversity. See Part 3: *Ecology & Biodiversity* (Section 3.1)

Promoting healthy and safe communities

Many individuals in Edgeley, including children, marginalized 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. See Part 4: (*Community, Health & Education*).

Gated wildlife and nature reserves offer schools options to expand education beyond school grounds, especially where (like Alexandra Park primary School in Edgeley) schools have no green areas or space to create natural habitat of their own. This should be a consideration of town planners in plans and strategies across Stockport when making decisions on sites that have potential to be reserved for nature and wildlife.

Open space and recreation

As it stands today, EWR can deliver ‘benefits for **nature and support efforts to address climate change**’. EWR 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. See Part 3: *Ecology & Biodiversity* (Sections 3.1.4.h. and 3.1.4.i)

EWR is not an extensive tract of land. It is easily accessible to the community of Edgeley. It is special because it is the last vestige of accessible natural habitat in Edgeley and of particular significance because of the ongoing biodiversity emergency and because it is the only area in Edgeley of reasonable size capable of being enhanced to provide community-wide ecosystem services for health, wellbeing and education. Its ecological significance and potential is furthered by its proximity to the neighbouring reservoirs particularly reservoir # 1 and reservoir #2.

7.2.3.a. NPPF and Promoting Sustainable Transport

Promoting sustainable transport

The outline part of the planning application (Ref: # DC/092211 - development of a car park to the south) involves permanently removing the last reasonable vestige of self sustainable natural habitat in Edgeley and along with it; the chances of establishing ecoservices which access to true natural habitat can offer

in sustainable contribution to health, wellbeing and social cohesion of many people over many generations. See Part 4: (*Community, Health & Education*).

Local plans and spatial development strategies should identify that reasonable alternatives to the car park in question would involve convincing, promoting, encouraging or incentives; for use of public transport for an average perceived figure of only 150-200 out of 19,750 people.

An alternative option that can also be considered is a robust match/event day system of park and ride buses from existing nearby town car parks. Such a system would provide added employment opportunities as well as encouraging use of more environmentally friendly and sustainable modes of transport.

If setting local parking standards for residential and non-residential development, policies should take into account:

- a) the accessibility of the development;*
- b) the type, mix and use of development;*
- c) the availability of and opportunities for public transport;*
- d) local car ownership levels; and*
- e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.*

NPPF, 2023, p31-33

The development area exists within easy reach of public transport routes.

Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.

Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.

NPPF, 2023, p31-33

The stadium is well situated within walking distance of Stockport railway station, close to Stockport bus station, has numerous bus stops, footpaths and means of access by sustainable transport. It is also situated within walking distance of numerous existing car parks, including a large multi-level NCP. Public transport routes also exist between those existing car parks and the stadium.

Considering development proposals

In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

*a) **appropriate opportunities to promote sustainable transport modes** can be – or have been– taken up, given the type of development and its location;*

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Within this context, applications for development should:

*a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to **facilitating access to high quality-public transport**, with layouts that maximise the catchment area for bus or other public transport services, and **appropriate facilities that encourage public transport use**;*

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

NPPF, 2023, p31-33

Virtually no events/matches (non of significance which can be foreseen) will be taking place during rush-hour traffic or when public transport is at capacity usage. The majority of matches currently take place on a Saturday and some in the evenings during weekdays. Possible, further promotion in the future (being an assumed justification for increased capacity) will also lead to more games on a Sunday. The development is a good example with which to promote sustainable transport modes utilizing public transport, especially considering its existing location in proximity to numerous routes of good quality public transport and existing nearby car parks. A specific match-day regular bus service could also be introduced which could run from the bus station up Wellington Rd (passing car park catchment zones), down Greek Street, to the stadium. Encouragement to utilize public transport and existing car parks would relieve traffic pressure on roads and streets in the immediate vicinity of the stadium (and neighbourhood) and minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, in what is a designated Conservation Area.

Making effective use of land

*Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while **safeguarding and improving the environment** and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating **objectively assessed needs**, in a way that makes as much use as possible of previously-developed or 'brownfield' land (Except where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity).*

The outline part of the planning application (Ref: # DC/092211) is counter to safeguarding and improving the natural environment. Mitigation and compensation is not the same as safeguarding and improving the natural environment. Strategy for accommodating objectively assessed needs should make consideration for areas deprived of access to local natural habitat.

Planning policies and decisions should:

a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;

In the case of the development of the outline part of the planning application (Ref: # DC/092211), planned new 'habitat' creation would be fragmented and piecemeal. Much of it would exist in ecologically harsh conditions; it would take decades for trees to become established; soil, microbe and fungi ecosystems would likely take longer; there would be little to no opportunity for deadwood habitat; it would likely be prone to over-management; it would be subject to extremely heavy footfall in immediate proximity and subject to litter, noise pollution and light pollution; and, is extremely unlikely to ever compensate for the loss of EWR in respect to its existing and potential qualities in contributing toward legally binding commitments to improve biodiversity and wildlife habitat.

*b) recognise that some undeveloped land can perform many functions, **such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production**;*

The idea presented in this document (in opposition of the outline part of the planning application DC/092211) is for a gated nature reserve offering ecoservices to local community including food production 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.

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and

e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well- designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers. They should also allow mansard roof extensions on suitable properties where their external appearance harmonises with the original building, including extensions to terraces where one or more of the terraced houses already has a mansard. Where there was a tradition of mansard construction locally at the time of the building's construction, the extension should emulate it with respect to external appearance. A condition of simultaneous development should not be imposed on an application for multiple mansard extensions unless there is an exceptional justification.

NPPF, 2023, p36-38

Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.

Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

*a) it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, **deallocate a site which is undeveloped**); And*

Identified needs:

As it stands today, EWR can deliver ‘benefits for nature, help stem declining wildlife abundance and support efforts to address climate change’. EWR cannot possibly be classed as surplus to requirements considering its potential to be enhanced to offer ecosystem service 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.

b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.

Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to:

a) use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework; and

*b) make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision **and access to open space***

NPPF, 2023, p36-38

Achieving appropriate densities

Planning policies and decisions should support development that makes efficient use of land, taking into account:

a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

b) local market conditions and viability;

*c) **the availability and capacity of infrastructure and services** – both existing and proposed – as well as their potential for further improvement and the **scope to promote sustainable travel modes that limit future car use;***

NPPF, 2023, p39-41

Edgeley is already one of the most densely built districts of Stockport. In the case of the planning application (Ref: # DC/092211) there exists an availability and capacity of infrastructure and services

related to public transport, and, the scope to promote sustainable travel modes that limit future car use by rejecting the outline part of the planning application (Ref: # DC/092211).

*d) the desirability of **maintaining an area's prevailing character** and setting (including residential gardens), or of promoting regeneration and change; and*

*e) the importance of securing well-designed and beautiful, attractive and **healthy places**.*

NPPF, 2023, p39-41

There is no better way of maintaining an areas prevailing character and healthy places than by not removing them.

Conserving and enhancing the natural environment

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;*

*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*

Policies and decisions should reflect understanding for the need to protect and enhance sites of biodiversity. Protection and enhancement is not the same as mitigation and compensation. Policies and decisions should also reflect an understanding of the wider benefits of natural capital and ecosystem services for local communities such as Edgeley. Policies and decisions should consider prevention of contributions toward soil, air, water or noise pollution or land instability. In the case of EWR that would entail the consideration of the natural spring fed rivulet which is ecologically connected to the reservoirs and the wider river system. Policies and decisions would also consider the effect of noise and light on any areas of habitat retained by car parks or piecemeal areas created in mitigation. In regard to stability of land, policies and decisions should also require consideration of a car park sloping toward said rivulet and

water system and the risk of increasing flow pressure westward (including Dale Street) an area already subject to flooding. In regard to stability of land, policies and decisions should also require consideration of a car park sloping toward houses whose cellars are already subject to flooding.

See Part 4: (*Community, Health & Education*) and Part 5: (*Water, Drainage & Flooding*).

*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.*

In terms of EWR, the area subject to the outline part of the planning application (Ref: # DC/092211) is the most valuable in Edgeley in terms of environmental value and in terms of potential for establishing a basis for ecoservices related to health and wellbeing and education. See Part 4: (*Community, Health & Education*).

Habitats and biodiversity

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*

As far as Edgeley is concerned, EWR is the ward's **only** area capable of supporting wildlife habitat to any consistent, sustainable or meaningful degree. The identification, mapping and safeguarding of EWR as a locally wildlife-rich habitat is covered in Part 3: *Ecology & Biodiversity*.

*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***

The development is a good example with which to promote sustainable transport modes utilizing public transport, especially considering its existing location in proximity to numerous routes of good quality public transport and existing nearby car parks. In consequence, refusing the outline part of the planning application DC/092211 would be promoting conservation of Edgeley's only area capable of supporting wildlife habitat to any consistent, sustainable or meaningful degree. Conserving EWR as a natural space, already serving as an area of functioning biodiversity, would be pursuant of identifying and pursuing opportunities at securing net gains for biodiversity as opposed to creating situations where securing such gains are forced. See Part 3: *Ecology & Biodiversity*.

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**;*

Not only would building a car park upon EWR contribute toward inducing local traffic, road clutter and conflict. It would also force compensation and mitigation measures in relation to biodiversity which would otherwise be unnecessary and which cannot replace habitat in Edgeley to the degree that it exists today. For more on the difference between the Climate Emergency (net gain, BNG) and the Biodiversity Emergency (wildlife habitat) see Part 3: Ecology & Biodiversity.

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

*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*

EWR is comprised of habitat of a scope and size which cannot be replaced locally. Compensation strategies published by the planning application are too fragmented and piecemeal and exist of areas too small or narrow to be considered viable solutions in terms of habitat creation. There is too high a risk of deterioration and loss of habitat value to any 'retained' section due to issues arising from the immediate proximity to a car park with very high footfall.

*d) development whose **primary objective** is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.*

The **primary objective** of this development (outline part of planning application (Ref: # DC/092211)) is **not** to conserve or enhance biodiversity.

*The following should be given the **same protection as habitats sites**:*

*a) **potential** Special Protection Areas **and possible** Special Areas of Conservation;*

b) listed or proposed Ramsar sites; and

c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

*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.

NPPF 2023, p53-54

The promotion of a sustainable pattern of development would make allowances for areas of natural habitat where areas of natural habitat are rare and where there is a need for access to it. Ecosystem service in Edgeley is at bare-bones level and the local community would benefit by the protection, designation and enhancement of existing habitat as well as improving and creating more natural environment (in terms of wildlife habitat) to enable a boost in terms of wellbeing, health, education and social cohesion. (See Part 4: *Community, Health & Education*).

In the context of Edgeley, EWR (as an area of habitat) 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 NPPF 2023, EWR should be considered as an asset warranting protection.

Ground conditions and pollution

Planning policies and decisions should ensure that:

*a) **a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.** This includes risks arising from **natural hazards** or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that Remediation);*

b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and

c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.

Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

*Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the **likely effects** (including cumulative effects) of pollution on health, living conditions and **the natural environment**, as well as the **potential sensitivity of the site or the wider area to impacts that could arise from the development**. In doing so they Should:*

*a) **mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development** – and avoid noise giving rise to significant adverse impacts on health and the quality of life;*

*b) **identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value** for this reason; and*

c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

*Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account **the presence of Air Quality Management Areas and Clean Air Zones**, and the cumulative impacts from individual sites in local areas. **Opportunities to improve air quality or mitigate impacts should be identified**, such as through traffic and travel management, and **green infrastructure provision and enhancement**. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.*

The outline part of the planning application (Ref: # DC/092211) would bring any 'retained' areas of existing natural environment within EWR and the natural spring fed rivulet ecologically connected to the reservoirs and the wider river system; into immediate proximity of a car park and subject to risk of pollution (noise and light), litter and anti-social behaviour. Any 'retained' areas of existing natural environment would drastically lose value in terms of security and provisions for wildlife.

Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

*The focus of planning policies and decisions should be on whether proposed development is an **acceptable use of land**, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.*

NPPF 2023, p55-56

7.3. Commitments - Local

A Biodiversity Emergency was declared by Greater Manchester Combined Authority in 2022. Commitments and associated reports and guidelines are relevant to this planning application because the commitments made and signed in regard to the Biodiversity Emergency recognize that loss (or lack) of natural habitat and biodiversity also has an impact upon local communities, health and education.

Understanding those impacts and making changes (to strategies and policies) pursuant of legally binding commitments aimed at stemming the biodiversity crisis can only begin at local levels. It is therefore important to understand the context of Stockport's potential at decision making level to reach goals and targets which favour community, health and education.

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, wellbeing and education which in turn have a positive and long lasting impact on the economy.

In the case of this Outline Planning Application (Part of Hybrid 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. Edgeley is an area deprived of access to natural habitat.

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.

7.3.1. Greater Manchester Combined Authority

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. See Section 7.2.1.

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:

*the need for transformative change across terrestrial and marine ecosystems, and across urban development and all productive sectors to ensure enhanced food security, human health and sustainable livelihoods whilst **avoiding, mitigating or minimising the negative impact on biodiversity.***

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.

None of the legally binding commitments, policies and strategies introduced or implemented by UK government at national level, such as the CBD's targets to reduce threats to biodiversity and to meet people's needs through sustainable use; *The Environment Act 2021*; the government's *Restoring Nature: The 25 Year Plan To Recover Nature and Improve the Environment*; the government's *Biodiversity 2020: a strategy for England's wildlife and ecosystem services*; or *The UK's National Biodiversity Strategy and Action Plan*; can be effected without local authority level participation.

In an effort to meet **requirements to global, national and local commitments** mentioned in this chapter, Greater Manchester's Local Wildlife Recovery Strategy is aimed at establishing ways of stemming habitat loss, protecting existing areas and improving biodiversity.

Time is needed to do this and it should be deemed unacceptable to lose natural wildlife habitat sites/areas to urban development before they are adequately surveyed and assessed for existing value and potential value in terms of not only quality as a unit but also by ranking according to the number and quality of the range of natural wildlife habitat sites/areas in the locality.

According to Greater Manchester Combined Authority, in order to remain in line with existing statutory regulation and guidance published by Defra, strategies should:

Map valuable existing areas for nature (as defined by Defra)

- ***Ascertain the state of nature, and the opportunities and issues important in Greater Manchester***
- *Collaboratively agree the priorities and opportunities for nature recovery in GM, for broad habitat types and species*
- *Detail measures (practical actions) for delivering them*
- ***Map proposals 'opportunity areas' for creating or improving GM for habitats and Species***
- *Set out how the strategy will be monitored*
- *Undertake a public consultation*

The Greater Manchester Local Wildlife Recovery Strategy, March 2024, / GMCA, p4

"Map proposals 'opportunity areas' for creating or improving GM for habitats and species" is entirely relevant and SMBC should consider the arguments in this document carefully before making any decision regarding the future of EWR. Consideration of the outline parts of the planning application which relate to changes to the landscape of EWR should wait until the ecological importance of EWR (both to biodiversity and to humans and the local community) is established with impartial honesty. As part of GMCA, Stockport Metropolitan Borough Council are required to fulfil legally binding commitments and statutory regulation. See Part 3: *Ecology & Biodiversity* and Part 4: *Community, Health & Education*.

7.3.2. Stockport

The Greater Manchester Biodiversity Action Plan 2009

The Greater Manchester Biodiversity Action plan (GM BAP) aims to provide an over-arching document across all ten districts in Greater Manchester; these are Bolton, Bury, Manchester, Oldham, Rochdale, Salford, **Stockport**, Trafford, Tameside and Wigan. The overall aim of the GM BAP is:

"To promote the conservation, protection and enhancement of biological diversity in Greater Manchester for current and future generations".

The Greater Manchester audit identified those species and habitats that are of local conservation importance and require action in order to conserve and protect them. Those habitats and species selected for the GM BAP were included for the following reasons:

- They are priority habitat or species within the UK BAP and occur in the GM area.
- They are considered to be of **conservation concern locally** within GM.

https://gmlrc.org/projects/gm_bap/

The list of habitats is: Grassland; Hedgerows; Lowland moss lands; Reedbeds and bittern; Ponds and lodges; Canals; Native woodland; Uplands; and Urban managed green space.

EWR is comprised of two of these: Grassland and Native woodland.

With enhancements and some of the ideas presented in this document regarding enhancement, EWR has the potential to add Hedgerows, Reed beds and Ponds to its composition. There is also scope, due to size, to make considerations for the re-introduction and attraction of endangered and listed species and others whose abundance is declining.

"Whilst it provides an overview of biodiversity concerns and actions for the county, some districts have created their own local action plans to focus biodiversity conservation to meet particular needs for their local area."

Areas have been added to the plan because they are considered to be of **conservation concern locally** within Greater Manchester.

EWR should be entered into the GM BAP and/or The Local Nature Recovery Strategy in order to contribute to the recovery of Britain's wildlife and the conservation of wildlife habitat. 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 green spaces for purposes of health and wellbeing.

Stockport and its districts should already be making a count of suitable wildlife habitat

Areas Considered to be of Conservation Concern Locally

As already considered in previous chapters; The Greater Manchester Biodiversity Action plan (GM BAP) aims to provide an over-arching document across all ten districts in Greater Manchester; these are Bolton, Bury, Manchester, Oldham, Rochdale, Salford, **Stockport**, Trafford, Tameside and Wigan. The overall aim of the GM BAP is:

"To promote the conservation, protection and enhancement of biological diversity in Greater Manchester for current and future generations".

The Greater Manchester audit identified those species and habitats that are of local conservation importance and require action in order to conserve and protect them. Those habitats and species selected for the GM BAP were included for the following reasons:

- They are priority habitat or species within the UK BAP and occur in the GM area.
- They are considered to be of conservation concern **locally** within GM.

Before making planning decisions relating to natural habitat in urban areas, councils, councillors and decision makers should consider independent ecological reports or otherwise initiate independent ecological reports with emphasis on changes to species abundance and in consideration of the number of such natural habitat areas within the locality.

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. A thorough survey should examine it over four seasons and not fail to understand its current importance and potential in regard to local species abundance. The length of time and establishment of its reclamation by nature (its re-wilding) should be noted and consideration of its situation in regard to links and corridors considered, even if they are not-as-yet officially designated.

Pursuant to ongoing and developing strategies and legally binding commitments aimed at protecting, restoring and enhancing biodiversity, wildlife habitats and the environment; local authority should be examining the feasibilities of all such sites. We need more, not less, protection by designation of wildlife habitat, whether it be small local habitats or larger nationally or regionally recognized areas.

Doing such is an ongoing process. *i.e.* those areas already designated now weren't at some point. Areas with existing suitable habitat or having potential to be so are no less important because they are not 'officially' designated. By not recognizing the ongoing process and not working toward securing suitable sites for nature, local authorities are reneging on their duty to adhere to policies and strategies set out to achieve such.

Targeted conservation efforts by environmental organisations have often been effective when and where species have been threatened. In order to remain within guidelines that have been set the same should now apply to the potential of suitable habitat (irrespective of whether endangered species exist upon site) in order to attract and re-introduce declining species. This can be done by officially designating protected areas and nature reserves which already, in essence, exist.

Highways and Transport

Policy T-2 outlines that developers must demonstrate that developments will not:

- result in inappropriate on-street parking
- have a damaging impact on the safety of the highway
- have a negative impact on the availability of public car-parking

As part of a planning submission, developers are expected to show that parking facilities to be provided as part of a development (or, where appropriate, off-site parking facilities) will be able to meet demand.

<https://www.stockport.gov.uk/highways-and-transport-advice/parking-in-developments>

An increase of the capacity of Edgeley Park stadium from 10,000 to 19,700 (doubling capacity) will induce traffic to the local area. Induced traffic will invariably result in inappropriate street parking, impact the safety of the highway in the local vicinity of the stadium and have a negative impact upon availability of public car-parking. The construction of a car park providing circa 60-70 spaces upon Edgeley's only area of habitat capable of sustaining wildlife to any meaningful degree will make insignificant difference in view of a perceived increase of 9,700 match and event goers. Such a car park, will, in effect, simply invite traffic into the vicinity whilst extinguishing Edgeley's last vestige of natural habitat of any size. The solution therefore, would be for the club to minimize parking capability and adopt a sustainable transport approach. Utilizing very adequate high quality public transport, creating a park and ride (shuttle) service from existing car parks, and encouraging, promoting and incentivizing a no car / public transport / park and ride approach.

Development must be situated in locations that are, or can be made accessible by foot, cycle and public transport. They must also have facilities and measures which ensure that staff, occupiers, customers and visitors can travel to the development by all modes of transport.

<https://www.stockport.gov.uk/highways-and-transport-advice/transport-highway-overview>

Local and national policy (including local policies CS9 'Transport and Development' and T-1 'Transport and Development') encourages / requires development to be located in accessible locations and easily accessible by sustainable modes of transport. Paragraph 108 of the National Planning Policy Framework (NPPF) outlines that when assessing applications for development, it should be ensured that appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location. Paragraph 102 outlines the need for transport issues to be considered so that opportunities to promote walking, cycling and public transport use are identified and pursued.

When considering the suitability of a site for development, developers therefore need to consider whether a site is accessible and this will need to be demonstrated in a Transport Assessment, Transport Statement or Transport Note submitted in support of a planning

application. When reviewing a site's accessibility, developers must consider a range of factors including:

- whether the site is situated within 400m of a bus stop on a high frequency bus route
- whether the site is situated within 1000m of a train station with a frequent service
- the ability to travel to / from the site by public transport from a range of locations in a reasonable length of time
- whether the site is situated within 800m of a district shopping centre or Stockport Town Centre
- whether the site is within a reasonable walking distance of the shops, services, schools and places of employment
- whether the site is within a reasonable cycling distance of the shops, services, schools and places of employment
- the availability and quality of pedestrian and cycle routes and infrastructure in the vicinity of the site
- gradients in the vicinity of the site

<https://www.stockport.gov.uk/highways-and-transport-advice/accessibility-developments>

The site exists within 400m (actually 150m) of high frequency bus routes. The site exists within 1,000m (actually 600m) of the town's main train station (6 platforms connected by a subway) with frequent service to most parts of England. The existing public transport network connects the site to other areas of Stockport by bus and train services in reasonable length of time directly (within 150m (bus) and 600m (train) and by the bus station (within 880m) and by numerous other bus stops in the area (closer than the bus station). The site exists within a district centre (181m from the district High Street). The site is in reasonable walking distance of all public modes of transport in Stockport and the district centre. There are numerous adequate pedestrian access routes to the site.

In regard to the outline part of the planning application DC/092211, the construction of a car park upon EWR would necessitate a gradient running north to south (from the stadium toward Moscow Road East). Homes along Moscow Road East, which is immediately adjacent to the proposed site, already suffer serious flooding. The water table, the natural spring fed rivulet running through EWR, the situation of the reservoirs and the function of the rivulet in regard to the local and wider water system should be of concern. Runoff and/or drainage from a gradient car park with an absence of (removed habitat) water soaking roots in perspective of local flooding issues should be of concern. The biodiverse sensitivity of EWR and adjoining land (reservoirs and homes) cannot be ignored. The concern should be in respect to potential road/highway flooding as well as ecology, ecosystem and homes. See Part 5: *Water, Drainage & Flooding*.

Suggested Considerations

In preparing a transport assessment the following considerations would be relevant:

Encouraging environmental sustainability

Reducing the need to travel, especially by car – reducing the need for travel (e.g. working from home and home delivery), reducing the length of trips, and promoting multi-purpose or linked trips by promoting more sustainable patterns of development and more sustainable communities that reduce the physical separation of key land uses.

Tackling the environmental impact of travel – by improving sustainable transport choices and by making it safer and easier for people to access employment, education facilities, health facilities, shopping, leisure facilities and services by public transport, walking, and cycling.

The accessibility of the location – the extent to which a site is, or is capable of becoming, accessible by non car modes, particularly for large developments that involve major generators of travel demand.

Other measures which may assist in influencing travel behaviour (ITB) – achieving reductions in car usage (particularly single occupancy vehicles), by travel planning and adopting [related] measures such as, encouraging public transport use through increased information, car sharing/pooling, and parking control. See Chapter 4 Travel Planning for further ideas.

Sustainable Transport / SPD, p8-9

7.3.3. Stockport Council and Encouraging Sustainable Transport

A travel plan is a package of measures implemented to manage the access to a development or institution so that it reduces the impacts of vehicle transport on the local environment and congestion and promotes sustainable modes of travel to and from the site and will be required as detailed in the policy above (TD1.3).

An effective travel plan will include measures to **increase travel choice** and **reduce dependency on the car** (for example offering discounted bus tickets or implementing a car share scheme) and measures to **discourage unnecessary car use** (for example by site design).

Travel plans can bring a range of benefits and address a range of issues, including:

- Reducing the need to travel.
- Reducing congestion and peak time conflicts.
- Reducing energy use/reducing emissions.
- Cutting the costs of providing and maintaining car parking.
- Freeing up car park space for expansion.
- Addressing car park shortages and local congestion on / around the site.
- Improving access to the site and travel choice.
- Tackling social exclusion
- Facilitating improved public transport through economies of scale.
- Encourage healthier lifestyles

Sustainable Transport / SPD, p13-14

The policies within the UDP Review and other council policy are attempting to improve this situation so that **sustainable transport modes including walking are a realistic alternative** for accessing facilities. A primary way of doing this is through the promotion of walking facilities in new developments. Planning Policy Statement 13 states that walking offers the greatest potential to replace short car trips, particularly those under 2 km and so walking should be promoted especially for journeys within this area from a development.

Sustainable Transport / SPD, p19

The Council **favours the use of public transport:**

To support the social and economic activity patterns that exist, are planned or desired for Stockport including:

- the regeneration of the Borough

- helping Stockport make its contribution to the accelerated growth desired within the sub-region, promoting of an inclusive community which, for example, requires transport equity to access work and leisure opportunities
- To offer a viable choice for journeys, particularly the daily commute, instead of the car, thus reducing the impact of private transport on the environment by achieving a switch to sustainable modes.

Sustainable Transport / SPD, p39

The recovery of nature and Edgeley's lack of wildlife habitat, along with the protection of that which remains, should be a concern in regard to the re-generation of the borough as should be the human benefits from community based activities, produce and learning -ecoservices - on health, wellbeing and social cohesion. Protecting, designating and enhancing Edgeley's last vestige of wildlife habitat of any meaningful size and choosing, instead, sustainable modes of transport, would contribute to legally binding commitments to improve the environment.

Public transport is likely to be more viable if there is a sufficient volume and concentration of movements between locations and along corridors. Networks become established over time and people make work and housing decisions on the basis of existing networks .The council seeks to ensure that development in Stockport should be in locations that benefits from good public transport provision that provides **an alternative to the car.** To this end the UDP has identified the Town Centre and A6 area from Heaton Lane to Greek Street as a transport hub.

The eastern end of Greek street is 710m from the stadium. The eastern end of Greek st identified as a transport hub, offering adequate alternatives to the car. Planning Policy Statement 13 states walking under 2km has the greatest potential to replace short car trips. And so "walking should be promoted especially for journeys with in this area from a development." The eastern end of Greek Street (the transport hub) is well under the 2km (2,000m).

Larger developments should have integrated public transport information systems.

The Greater Manchester Public Transport Executive (GMPTE) will wish to comment on developments directly affecting public transport infrastructure (existing or proposed); and developments which may have significant transport implications in terms of their trip generation or the fact that they are inaccessible by public transport The UDP acknowledges the need to work with the GMPTE in relation to public transport issues.

Sustainable Transport / SPD, p40

Intergrated Transport Corridors and Bus Network

The Council supports the creation and extension of a network of Integrated Transport Corridors and will take account of this network when considering development proposals. New developments should take account of the potential of the Integrated Transport Corridor network to assist in reducing road traffic and meeting the aim of modal shift in strategic corridors.

Development proposals close to the network will be required to make a contribution in accordance with Policy TD1.1. Elsewhere, developments will be expected to maximise the use of existing bus services and/or promote new services to meet their travel needs, enhancing infrastructure and service levels where appropriate to mitigate the transport impact of their Developments.

Sustainable Transport / SPD, p44

An alternative solution to the outline part of planning application DC/092211 therefore, would be for the club to minimize parking capability and adopt a well organised, well promoted sustainable transport approach. Utilizing very adequate high quality public transport, creating a park and ride (shuttle) service from existing car parks, and encouraging, promoting and incentivizing a no car / public transport / park and ride approach.

Possible Travel Plan Ideas

Adopting a sustainable approach in seeking alternatives to the outline part of planning application DC/092211 would/could include considering implementing :

Improved transport network provisions where needed
Providing travel information at all points of contact with the stadium - adverts, letters, tickets, *etc*
Discounted tickets on public transport for matchday/event ticket holders
Discounted matchday/event tickets for using public transport
Interest-free season ticket loans and /or tax free bus tickets
Introducing a park and ride shuttle bus from existing car parks
Introducing a special frequent matchday/event day circular bus
Discounted parking permit schemes in existing car parks
Encouraging personalised journey planning, walking and car sharing.
Matchday merchandize stalls along Greek Street or along walking routes from A6 transport hub

7.4. Match Going Fan Base - Analysis

Is the destruction of Edgeley's only reasonable sized area of wildlife habitat to construct a car park justified?

The following is an analysis of the match-going fan base in regard to Stockport County Football Club.

Data sources: www.worldfootball.net / www.transfermarkt.co.uk / www.european-football-statistics.co.uk / www.footballwebpages.co.uk / www.englishfootballstats.co.uk

7.4.1. Stockport County League Status:

Average League Position (1889 - 2023) = **75th**

There are four (4) tiers in English football. Each Tier contains circa twenty-two (22) teams.

There are a further two significant non-league tiers :

- a) A National non-league tier
- b) A North / South non – league tier

The various leagues and non-league divisions have changed format and names often since **Tier 1** became the Premier League in 1992/93.

E.g. League 1 can refer to Tier 3 and Division 1 can refer to Tier 3.

Therefore, for clarity, the following stats refer only in terms of '**Tiers**'.

At the time of writing Stockport County are currently (end of 2023/24) in Tier 3 after being promoted from Tier 4. They are yet to play in Tier 3 as the 2024/25 season has not begun.

7.4.2. Stockport County Attendance History:

Average home attendance (1889 – 2023) = **6,267**

Tier 3	Av. Home Attendance
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92/93	4755
93/94	5488
94/95	4525

95/96	5903
96/97	6424

(overall average / 5 seasons: **5,419**)

Within **Tier 3** (between 1993 and 1997) we can see that average attendance rose to levels consistent with the clubs 134 year average attendance of **6,267** with the likelihood of promotion to Tier 2.

Tier 2 Av. Home Attendance

97/98	8271
98/99	7778
99/00	7411
01/02	6245

(overall average / 4 seasons: **7,426**)

Within **Tier 2** (between 1998 and 2002) we can see that the 150 year average attendance rose by around 2,000 and began to drop off again (by 1,000+) to a level closer to the clubs 134 year average attendance with the club struggling to maintain Tier 2 status.

***Tier 2** includes clubs vying for a place in the Premier League and is populated by big well supported clubs with recent Premier League history. This is considered a high level in football. *E.g.* This tier included Manchester City, Wolverhampton Wanderers, Birmingham City.

Stockport County had the lowest average attendance of all the clubs in this tier. The average attendance for all clubs in this tier in the 01/02 season was **14,693**

While in Tier 2 Stockport's average attendance matched half that figure.

We can also note a steady falling away of 2,000 supporters over the four year period in Tier 2

Tier 3 Av. Home Attendance

02/03	5489
03/04	5315
04/05	5000

(overall average / 3 seasons: **5,268**)

Compared with the club's previous spell in **Tier 3** (92/93 to 96/97) we can see that average support dropped by around 1,000. This could be for many reasons (ticket prices, economic climate, fewer free tickets for schools, *etc*).

Within this spell in Tier 3 we can see that average attendance was approx. 1,000 below the 134 year average.

We can note a steady falling away of 489 supporters over the 3 year period in Tier 3.

Tier 4 Av. Home Attendance

05/06	4772
06/07	5514
07/08	5643

(overall average / 3 seasons: **5,309**)

Within **Tier 4** (2005 to 2008) we can see that average attendance dropped again to a level 1,500 below the 134 year average but then increased to a level only 600 below that average with the likelihood of promotion to Tier 3.

We can note a steady increase of 871 supporters over the 3 year period in Tier 4.

Tier 3 Av. Home Attendance

08/09	6126
09/10	4420

(overall average / 2 seasons: **5,273**)

Within **Tier 3** (2008 to 2010) we can see that average attendance rose to levels 1,000 below the clubs 134 year average attendance but when faced with descent to tier 4 , support dropped off to levels even lower than the last spell in tier 4.

We can note a steady falling away of 1,706 supporters over the 2 year period in Tier 3.

Tier 4

10/11	4163
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(Overall average / 1 season: **4,163**)

Within **Tier 4** (2010 to 2011) we can see that average attendance was 2,000 below the 134 year average and 1,000 less than the previous spell in tier 4.

Non-League Tier(s)	Av. Home Attendance
11/12	3677
12/13	3480
13/14	2260
14/15	2590
15/16	n/a * Work on Stadium?
16/17	3000 (circa)
17/18	2984

18/19	3997
19/20	4342
20/21	103 * Covid?
21/22	7128

(overall average / 9 seasons (15/16 & 20/21 not included): **3,717**)

Within the **non-league Tiers** (2011 to 2022) we can see that average attendance was almost half the 134 year average in total.

Exceptionally, in the aftermath of Covid, the 2021/22 season saw a sudden rise in attendance which was double the overall average for this period. It was also 1,900 above the 134 year average.

There may be complex explanations relating to many things including better marketing, prices, COVID restrictions being lifted, *etc*).

Tier 4

22/23	8790
23/24	8682

(overall average / 2 seasons : **8,736**)

Within **Tier 4** (2022 to 2024) we can see that average attendance level of 2021/22 which suddenly improved by 1,900 above the 134 year average attendance gained a further 1,700 average making a total of 8,736 which is a total of 2,500 above the 134 year average but still **2,200 below the capacity of the stadium as it is today.**

Conclusions:

Since 1997, it can be noted that after initial boosts in the initial year after promotion, Stockport's average attendance has always steadily declined during spells in tiers above Tier 4.

Tier 2 (97/98 – 01/02)

8,271 - 6,245 DECLINE over 4 years

Tier 3 (02/03 to 04/05)

5,489 – 5,000 DECLINE over 3 years

Tier 4 (05/06 to 07/08)

4,772 – 5,643 INCREASE over 3 years

Tier 3 (08/09 to 09/10)

6,126 – 4,420 DECLINE over 2 years

The **population of Stockport is 297,107** according to mid-2022 population figures published by the ONS. The population of Edgeley is 14,182 according to the 2021 census. The average home attendance of SCFC is **6,267**. Stockport County FC match-going fan base is (on average) **2.1%** of the population of Stockport.

7.5. Existing Car Parks

7.5.1. Match Day Parking Survey

Local Car Park Survey. 8th May 2023 (Coronation Bank Holiday). 3pm - 4pm

The survey was conducted during the final league game of the season. Stockport County FC were playing at home against Hartlepool. This survey was undertaken while the match was in progress. Stockport were chasing promotion from League Two (4th Tier) to League One (3rd Tier). There was a large crowd. Attendance: 10,118 (full).

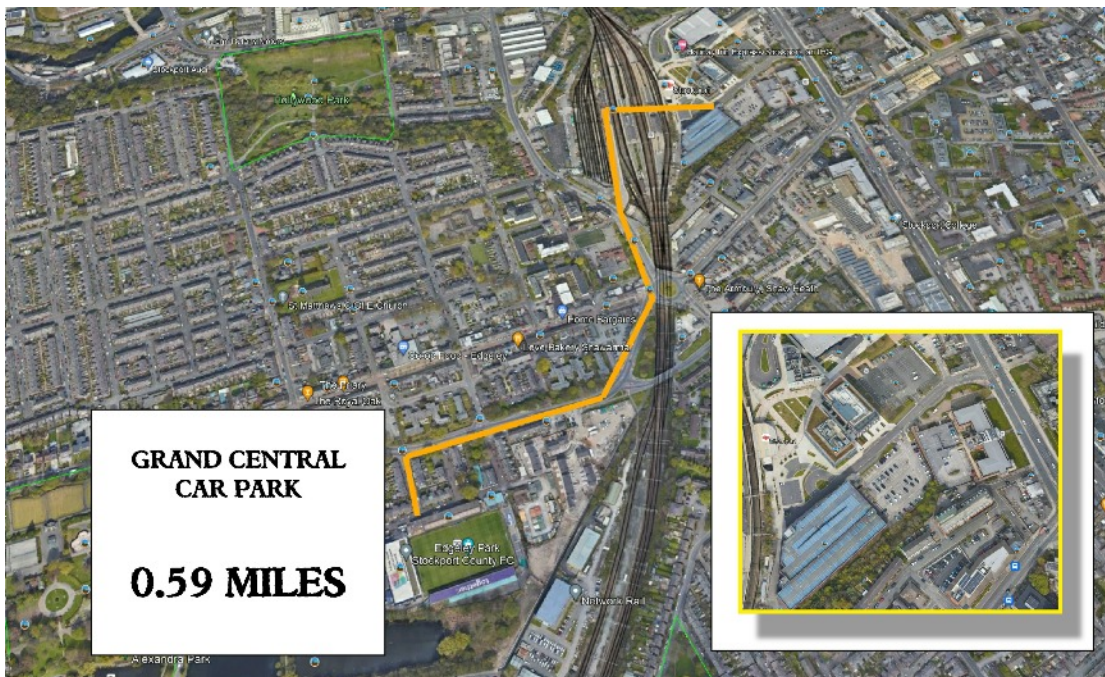
The survey noted spaces in local car parks and thereafter made measurements to determine distances. Not all local car parks were observed.

*An image of Castle Street in Edgeley is attached here in order to give local perspective to walking distances.

PERSPECTIVE

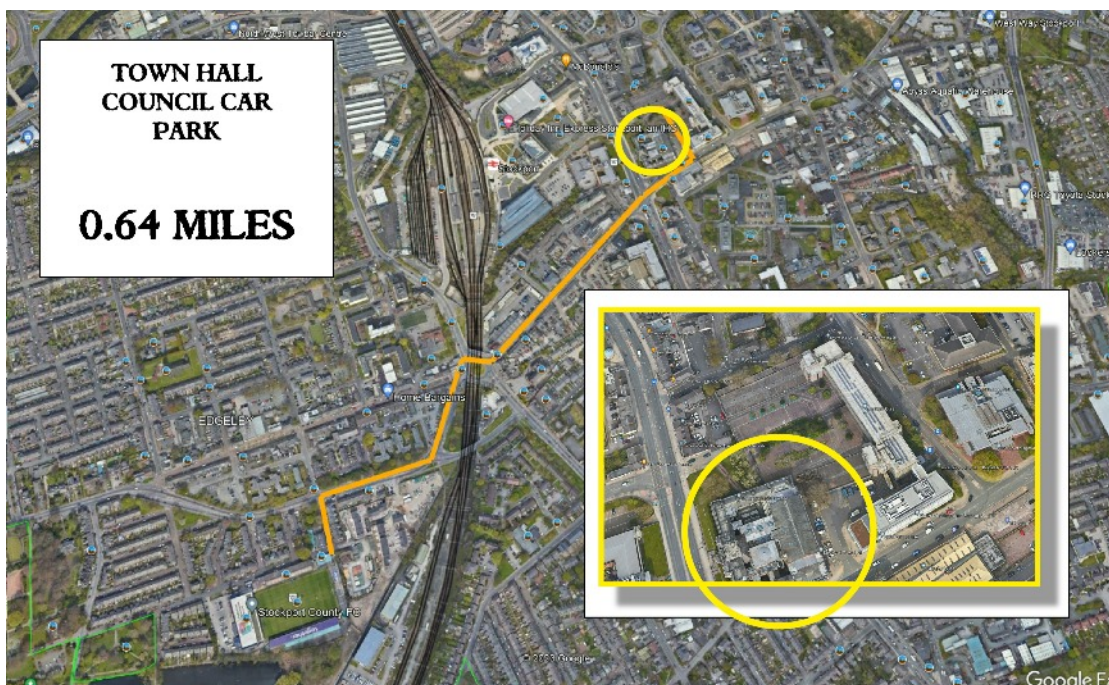


**WALKING THE LENGTH OF CASTLE STREET AND BACK AGAIN
(0.6 miles)**

NCP - Grand Central Car Park

Distance from stadium entry - 0.59 miles / 0.95 km. Just over half a mile.

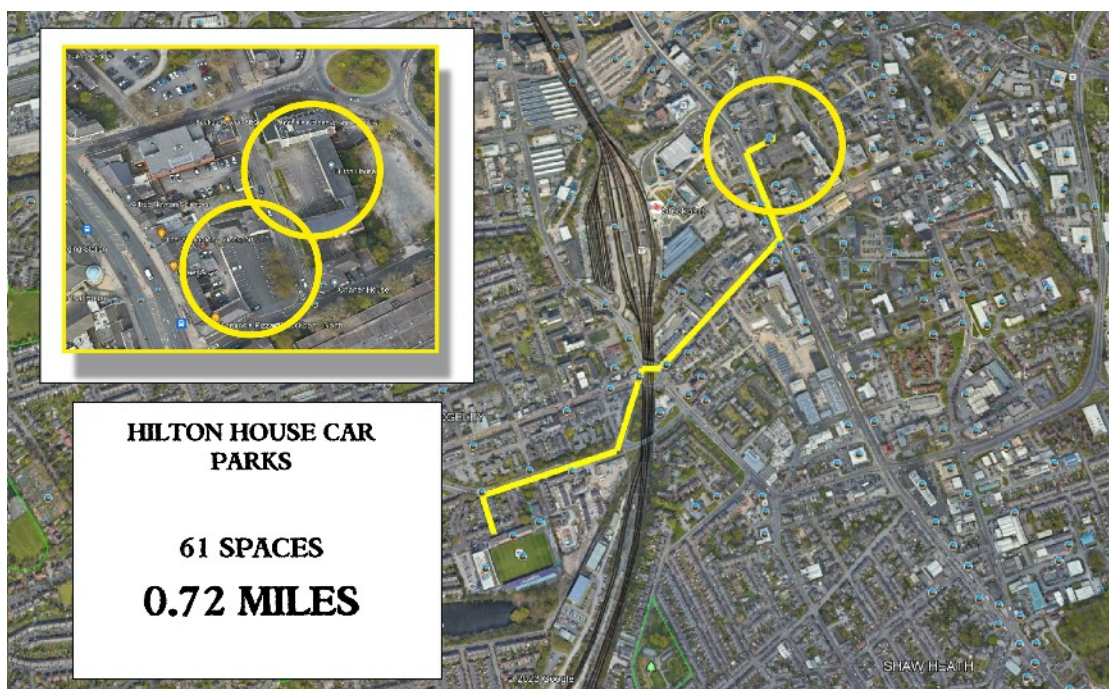
Many empty spaces observed inside the main car park.

Town Hall Council Car Park

Distance from stadium entry - 0.64 miles / 1.02 km. Just over half a mile.

Many empty spaces observed inside the main car park.

Hilton House Public Car Parks



Distance from stadium entry - 0.72 miles / 1.15 km. Just under $\frac{3}{4}$ of a mile.

These neighbouring car parks (containing almost the same number of spaces planned to be created upon EWR (wildlife habitat) by the outline part of planning application DC/092211 were open and **completely empty**.

It should also be noted that as clubs progress up the football league tier system (due to TV rights) they play increasingly more games on Sundays and on weekday evenings.

This means that many games will be played when shops and offices are closed and car parking is easier to find in existing car parks such as the NCP behind the train station.

7.6. Sustainable Transport

Park&Ride, alternatively written as 'Park & Ride' or 'Park and Ride', is an integrated transport system enabling users of private vehicles to park in a safe location outside the town/city and travel directly into the centre via public transport. This service is also commonly used to take customers to other congested sites such as hospitals or attractions (e.g., Bicester Village) where available parking is scarce and expensive. Although other forms of public transport can be used, Park&Ride is typically centred around a high-frequency bus service that provides customers with fast, convenient, and excellent value travel.

The key objectives of Park&Ride are usually to:

- Decrease urban congestion.
- Decrease vehicle-related pollution.

Congestion can be reduced by using high-capacity buses. For example, a typical Park&Ride double-decker bus has seating and standing space for 75 customers. When at total capacity, this reduces the number of private vehicles on roads leading into city centres, therefore helping to improve mobility in urban areas for both buses and other vehicles.

The second key objective is to reduce vehicle-related pollution. As an inevitable by-product of the combustion process, petrol and diesel vehicles produce waste emissions such as carbon monoxide (CO), carbon dioxide (CO₂), and nitrogen oxides (NO_x). These emissions contribute to air pollution and can be harmful to the environment and our health.

7.6.1. Park & Ride Example, Greater Manchester

Park and Ride Manchester UK facilities offer commuters and travellers a convenient solution for parking their vehicles on the outskirts of the city and continuing their journey into the city centre using public transportation. Typically, these facilities provide ample parking spaces along with frequent bus or tram services that connect commuters to key destinations within the city.

One of the primary advantages of Park and Ride Manchester UK facilities in Greater Manchester is their convenience and accessibility. By parking your vehicle in designated park-and-ride lots located near major highways or public transportation hubs, you can avoid the hassle of navigating congested city streets and searching for parking in the city centre. Instead, you can board a bus or tram directly from the park run and ride site, enjoying a stress-free journey into Manchester city bustling heart.

Although its key objectives are to reduce urban congestion and vehicle-related pollution, there are also other benefits that make Park&Ride a fantastic choice for travel into the city centre: Generally cheaper than city parking. Generally quicker than driving. Reduces stress.

- Generally cheaper than city parking
 - Generally quicker than driving
-

- Reduces stress
- Positive impact on the economy

7.6.2. Park & Ride Example, Oxford

By encouraging more people to use the bus, many of which have hybrid engines (e.g., Euro 6), urban congestion and vehicle-related pollution are significantly reduced.

Using Oxford's Park&Ride services reduces congestion by decreasing the number of private vehicles on the roads in urban areas. This is achieved by:

- Locating Park&Ride car parks outside the city in well-connected areas.
- Using high-capacity buses.

In turn, this contributes to a reduction in vehicle-related pollution in urban areas. As many buses utilise hybrid engine technology, the benefits of taking the bus over private transport are further emphasised. For example, catching the 300 bus from Pear Tree Park&Ride to the Westgate Shopping Centre in Oxford would save 911g of CO₂ compared to driving, the same as keeping a light bulb on for 256 hours!

Compared to driving and parking in the city, Park&Ride is generally a cheaper option. For example, we currently offer a combined parking and bus ticket so you will pay no more than £5 for 16 hours of parking as well as return bus travel for two adults. This also includes free travel for up to three children.

Park&Ride is a faster way to get into the city centre. This is because:

- Well-connected and highly accessible car parks eliminate the time-consuming process of finding parking spaces in the crowded inner city.
- High-frequency buses ensure minimal waiting time for transport into the city centre.
- Buses can use priority measures such as bus lanes and bus gates, often providing more direct routes into the inner city (e.g., Oxford High Street between Queens Lane and Catte Street).

Using Park&Ride in Oxford can help reduce stress by allowing customers to spend time unwinding rather than driving in congested traffic and searching for a parking space in the city centre. In fact, recent research conducted by Transport Focus and Highways England suggests 'less stressful' is the second most cited benefit of Park&Ride by service users, beaten only by 'ease of travel'.

This benefit is also important for those who use Park&Ride for their daily commute. By enabling faster, more direct journeys into certain areas, Park&Ride in Oxford reduces time costs for commuters so they can spend less time travelling and more time being productive. Many commuters use their bus journey to get ahead on work, reducing their workload during the working day and further alleviating work-related stress.

Park&Ride systems have a **positive impact on the economy**. By providing a convenient and affordable way to get to the city centre and other points of interest, more people have access to businesses and services in these areas. In turn, this stimulates growth in the business and tourism sectors.

7.7. Summary

An increase of the capacity of Edgeley Park stadium from 10,000 to 19,700 (doubling capacity) will induce traffic to the local area. Induced traffic will invariably result in inappropriate street parking, impact the safety of the highway in the local vicinity of the stadium and have a negative impact upon availability of neighbourhood public car-parking. The construction of a car park providing circa 60-70 spaces upon Edgeley's only area of habitat capable of sustaining wildlife to any meaningful degree will make insignificant difference in view of a perceived increase of 9,700 match and event goers. Such a car park, will, in effect, simply invite traffic into the vicinity whilst extinguishing Edgeley's last vestige of natural habitat of any size. The solution therefore, would be for the club to minimize parking capability and adopt a sustainable transport approach. Utilizing very adequate high quality public transport, creating a park and ride (shuttle) service from existing car parks, and encouraging, promoting and incentivizing a no car / public transport / park and ride approach.

The site exists within 400m (actually 150m) of high frequency bus routes. The site exists within 1,000m (actually 600m) of the town's main train station (6 platforms connected by a subway) with frequent service to most parts of England. The existing public transport network connects the site to other areas of Stockport by bus and train services in reasonable length of time directly (within 150m (bus) and 600m (train) and by the bus station (within 880m) and by numerous other bus stops in the area (closer than the bus station). The site exists within a district centre (181m from the district High Street). The site is in reasonable walking distance of all public modes of transport in Stockport and the district centre. There are numerous adequate pedestrian access routes to the site.

In regard to the outline part of the planning application DC/092211, the construction of a car park upon EWR would necessitate a gradient running north to south (from the stadium toward Moscow Road East). Homes along Moscow Road East, which is immediately adjacent to the proposed site, already suffer serious flooding. The water table, the natural spring fed rivulet running through EWR, the situation of the reservoirs and the function of the rivulet in regard to the local and wider water system should be of concern. Runoff and/or drainage from a gradient car park with an absence of (removed habitat) water soaking roots in perspective of local flooding issues should be of concern. The biodiverse sensitivity of EWR and adjoining land (reservoirs and homes) cannot be ignored. The concern should be in respect to potential road/highway flooding as well as ecology, ecosystem and homes. See Part 5: *Water, Drainage & Flooding*.

The recovery of nature and Edgeley's lack of wildlife habitat, along with the protection of that which remains, should be a concern in regard to the re-generation of the borough as should be the human benefits from community based activities, produce and learning -ecoservices - on health, wellbeing and social cohesion. Protecting, designating and enhancing Edgeley's last vestige of wildlife habitat of any meaningful size and choosing, instead, sustainable modes of transport, would contribute to legally binding commitments to improve the environment.

The eastern end of Greek street is 710m from the stadium. The eastern end of Greek street has been identified by SMBC as a transport hub, offering adequate alternatives to the car. Planning Policy Statement 13 states walking under 2km has the greatest potential to replace short car trips. And so "walking

should be promoted especially for journeys with in this area from a development.” The eastern end of Greek Street (the transport hub) is well under the 2km (2,000m).

An alternative solution to the outline part of planning application DC/092211 therefore, would be for the club to minimize parking capability and adopt a well organised, well promoted sustainable transport approach. Utilizing very adequate high quality public transport, creating a park and ride (shuttle) service from existing car parks, and encouraging, promoting and incenticizing a no car / public transport / park and ride approach.

7.8. Alternative Example



