

4. COMMUNITY, HEALTH AND EDUCATION

Introduction

Edgeley Wildlife Reserve Group object to plans to develop the land defined by this document as *EW* (see Part 1: *Introduction* and Part 2: *Site Boundaries*) or any disturbance to that land for the purpose of development south of the stadium on the basis of the points raised in this document.

In objection to the outline part of the planning application (Ref: # DC/092211) to build a car park; Part 3: (*Ecology & Biodiversity*) of this document argues for the protection, designation and enhancement of EWR as a nature reserve. Part 3 focuses upon legally binding commitments to halt the decline of nature in the UK. Many of those arguments (explained in more depth in Part 3) also consider lack of access to nature from a human perspective. The Edgeley community is deprived of true natural space and Part 3 lists various legally binding commitments in regard to protecting, restoring and enhancing biodiversity for local communities as well as arguments for the designation of a nature reserve.

This part (Part 4) adds to the argument against a car park in favour of a designated nature reserve on the basis of community health, wellbeing, education and social cohesion.

A lack of nature in people's lives is a catalyst for poor mental and physical health. The fact that already deprived neighbourhoods are suffering from poor quantity and quality of nature widens the mental and physical health disadvantage gaps for these communities.

We need more than sticking plaster solutions to tackle the symptoms of nature decline in our most marginalised communities. Major change on the ground is needed to give a natural boost to people's health through greater access to parks, woodlands, rivers and other spaces. The Government must steer this change with a decisive mission, mandatory standards and centralised funding

Abi Bunker, Director of Conservation and External Affairs at the Woodland Trust

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

EW

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4. 1. Nature, Social Impact and Health

The following passages all argue toward more access to natural space in urban environments and are presented as arguments against the outline part of the planning application (Ref: # DC/092211) and in favour of protecting, restoring and enhancing EWR pursuant to legally binding commitments covered in more detail in this document in Part 3: *Ecology & Biodiversity*.

Around 1 in 3 (7.8 million) English households don't have nature near home. And in large areas of the country the majority of the population don't have nature nearby. These new findings show that in a third of local authorities more than 70% of households don't have access to nature within 15 minutes' walk. With 1 in 10 local neighbourhoods (Lower Super Output Areas LSOAs) having more than 90% of the population without local nature access and 3% of neighbourhoods (909 LSOAs) having no accessible local nature at all.

Wildlife & Countryside Link

The pandemic exposed deep inequalities in access to green space. Nationally, there are 295 deprived neighbourhoods of 440,000 people that are grey deserts, with no trees or accessible green space.

THE NATIONAL TRUST

Access to nature isn't just an environmental issue, it's a social justice issue. These results show that the most disadvantaged and marginalised communities are most likely to be left cut off from nature.

Richard Benwell, CEO of Wildlife and Countryside Link

Having easy access to healthy natural places is proven to increase exercise and improve social connections and mental health. The truth is that too many people live in polluted, nature-deprived neighbourhoods at great cost to their health and wellbeing.

It is unacceptable that a third of us do not have green spaces near home – that must change. The Government has promised that everyone will be able to access **nature-rich areas** within 15 minutes' walk – but there is an alarming lack of information about how this will be achieved. This report clearly shows how new legal requirements and ring-fenced local funding, targeted to help those living in nature-poor areas, is critical to bridge the nature access gap.

Craig Bennett, Chief Executive of The Wildlife Trusts

4.1.1. Commitments - National & Local Government

Part 3: *Ecology & Biodiversity* of this document covered legally binding commitments which national and local authority are duty bound to honour. Many of them are directly related to **health, wellbeing and community cohesion**. This section revisits some of the legally binding commitments which are focused upon local communities and health.

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

4.1.1.a. Declarations and Commitments

It is important to understand that the public expect authorities which make declarations, sign agreements and publish commitments to take their promises seriously.

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.

EWR may be a small stone on a global mountain but it is a monumental gate pillar in local terms, both for the creatures which rely upon it, the catchment area of eight primary schools, the Edgeley community, and for other reasons covered by this document as a whole.

4.1.1.b. The International 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.

Four overarching goals of CBD set out a vision for biodiversity by 2050. Two of them are:

Substantially increase the area of natural ecosystems by maintaining, enhancing or restoring the integrity, connectivity and resilience of all ecosystems. Reduce by tenfold the extinction rate and risk of all species and increase the abundance of native wild species. Maintain the genetic diversity of wild and domesticated species and safeguard their adaptive potential.

And;

Ensure nature's contributions to people are valued, maintained and enhanced, with those contributions currently in decline being restored.

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)*.

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. In 2022 the UK agreed that goals with the year 2050 in mind should prioritize:

- **Protecting and restoring nature and substantially increasing the area of natural ecosystems**
- **Prospering with nature** using biodiversity sustainably
- **Sharing all the benefits of the genetic resources of nature fairly, including with indigenous people and local communities**

Protecting and restoring nature, or increasing the area of natural ecosystems cannot be achieved by robbing Peter to pay Paul. Urban development is the chief driving force behind loss of habitat and ecosystems. Mitigation and compensatory tactics should be a last resort. Where options remain and alternatives exist, mitigation and compensation should not be viewed as positive tools in making planning decisions. If we are to regain control and change negative trends we must recognize that

habitat needs protecting in order for nature to be restored. At EWR, nature exists. It exists in a situation and at a location which can contribute toward further restoration which will benefit people and the local community in terms of health and education, as well as the natural world.

By understanding, realising and recognizing the value of EWR and its potential, the 'area of national natural ecosystems' can be 'Increased'. With it gone, an opportunity is lost in working toward achieving legally binding commitments. Other human orientated opportunities which would come of protecting and restoring EWR would also be lost.

Biodiversity sustainability is not just about the use of new methods, technologies and environmentally friendly regard in planning design or construction. Biodiversity sustainability starts with recognising biodiversity potential in the first instance. There are also many ways humans and communities can benefit and prosper from biodiversity sustainability and sustaining biodiversity.

In the immediate locality of the planned development (*i.e.* Edgeley) there is a distinct lack of wildlife habitat of any reasonable size or condition. EWR is the largest parcel of land in Edgeley and evidently EWR is the only parcel of land in Edgeley, that can be truly considered as offering the potential to enhance wildlife habitat on any meaningful scale. Edgeley is a deprived area. It is not only deprived economically but access to meaningfully sized spaces managed for nature at this current time, is zero. Edgeley is a local community. National government has committed to sharing all the benefits of the genetic resources of nature fairly, including with indigenous people **and local communities**.

4.1.1.c. Interim Targets Set

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. UK government has therefore agreed to a set of interim targets, these include a set of targets aiming to meet people's needs. These are:

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

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

TARGET 9: Manage Wild Species Sustainably To Benefit People

Ensure that the management and use of wild species are sustainable, thereby providing social, economic and environmental benefits for people, especially those in vulnerable situations and those most dependent on biodiversity, including through sustainable biodiversity-based activities, products and services that enhance biodiversity, and protecting and encouraging customary sustainable use by indigenous peoples and **local communities**.

Importance

Biodiversity is the source of many goods and services on which people depend. The maintenance, in quantity and quality, of the benefits provided by biodiversity offers an important incentive for the conservation and sustainable use of biodiversity. It will not be possible to reach the 2050 Vision if the benefits provided by biodiversity, particularly those related to nutrition, food security, livelihoods, **health and well-being**, are not ensured.

Explanation

The main focus of this target is ensuring that the management and use of wild species is sustainable for the benefit of people. The target further contains a number of elements that need to be considered:

Social, economic and environmental benefits – Wild terrestrial, freshwater and marine species contribute to human well-being in multiple ways, including by providing nutrition, food security, medicines and livelihoods. The use and management of wild species needs to consider the various social, economic and environmental benefits provided by wild species to people. The target further specifies that particular attention should be given to those people living in vulnerable situations and for whom wild species are particularly important to their well-being as they may be engaged in biodiversity-based economic activities, or rely on biodiversity based products and services.

Customary sustainable use by indigenous peoples and local communities – Actions to implement this target should take into account indigenous and local systems for the control, use and management of natural resources and seek to protect and encourage these. Customary use of biological resources includes spiritual, cultural, economic and subsistence functions.

Guiding Questions For National Target Setting

What measures are in place to ensure the sustainable use and management of wild species? How effective have these been? How could their effectiveness be improved? How are the social, economic and environmental benefits provided by wild species accounted for in these processes? Which groups are particularly dependent on these benefits, and how are their needs accounted for? How is customary sustainable use by indigenous peoples and local communities protected and encouraged?

Which wild species are not currently being used or managed sustainably? Why is this the case?

What are the opportunities and constraints to enhancing sustainable use and management? What are the potential ecological, economic, and social costs and benefits of enhancing sustainable management? Who are the actors that may be affected? How can they be involved and their needs addressed?

What additional resources (financial, human and technical) will be required to reach the national target? How can additional resources be raised? What are the possible sources for these resources?

TARGET 9: Summary and relation to EWR:

This target focuses on the management and sustainability of wild species to benefit people. Wild native species such as hazelnuts, apple, pear, cherry, raspberry, blackberry and many overlooked wild native herbs, berries, leaves and fungi have clear benefits for people in terms of consumption and health. Likewise, the activity of interacting with such wild species in a natural environment has benefits for people in terms of wellbeing, education and cultural satisfaction.

According to the idea of creating a gated nature reserve; EWR has the potential, with correct management and enhancement, to provide historically cultural biodiverse friendly and sustainable products and activities which can also lead to improvements in health and well-being in the community. The positive differences of activities pursued in a natural habitat setting are discussed in Part 4: *Community, Health & Education*.

It is clear, particularly in urban environments, that people have lost touch with the cultural practices and learning that natural habitat can provide. There is a wealth of evidence to suggest that the negative impact of not having access to such activities locally within urban areas is detriment to health and wellbeing. EWR offers a potential opportunity to re-introduce such activities to generations of children and adults.

With the added inclusion of community growing beds such as those provided by Seeding The Change (see Part 7: *Alternatives* and Part 4: *Community, Health & Education*) EWR holds potential value in **meeting people's needs through sustainable use and benefit sharing**.

People and communities have cultural needs as well as economic needs. For example; picking wild fruit for pies and jam was once a widespread activity until relatively recently.

With Edgeley lacking in similar areas, the size of EWR as it is now, offers opportunities for people local or near to Edgeley to practice such cultural needs and/or re-educate their children of what beneficial wild species exist. In regard to wild species; EWR also has the potential to serve as an educational base for the local community.

Understanding this should be an incentive for the conservation and sustainable use of EWR after enhancement in order to thereafter provide an area which meets **people's needs through sustainable use and benefit sharing**.

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

Ensure that areas under agriculture, aquaculture, fisheries and forestry are managed sustainably, in particular through the sustainable use of biodiversity, including through a substantial increase of the application of biodiversity friendly practices, such as sustainable intensification, agroecological and other innovative approaches, contributing to the resilience and long-term efficiency and productivity of these production systems, and to food security, conserving and restoring biodiversity and maintaining nature's contributions to people, including ecosystem functions and services.

Importance

Agriculture, aquaculture, fisheries and forestry are globally important production systems that have varying impacts on ecosystems and biodiversity. The variety and variability of animals, plants and microorganisms used in these systems is an important aspect of biodiversity. Further, in many countries, activities associated with these production systems are important elements of human well-being and economic activity. However, the increasing demand for food, fibre and fuel is leading to increasing losses of biodiversity and ecosystem services, making sustainable management in these systems an urgent requirement. On the other hand, sustainable management not only contributes to biodiversity conservation but can also deliver benefits to production systems in terms of ecosystem services such as soil fertility, erosion control, enhanced pollination and reduced pest outbreaks, as well as contributing to the well-being and sustainable livelihoods of people engaged in agriculture, aquaculture, fisheries and forestry activities.

Explanation

The main focus of this target is to ensure that the areas used for agriculture, aquaculture, fisheries and forestry are managed sustainably. To accomplish this, the target sets out a number of elements that need to be taken into account:

Managed sustainably, in particular through the sustainable use of biodiversity – The sustainable use of biodiversity is defined under Article 2 of the Convention as the use of components of biological diversity in a way and at a rate that does not lead to the long-term decline of biological diversity, thereby maintaining its potential to meet the needs and aspirations of present and future generations.

Biodiversity-friendly practices – Biodiversity-friendly practices are those that help to increase the positive effects and reduce the negative effects of production practices on biodiversity. They largely overlap with practices that make enhanced use of biodiversity on farm to support the productivity and resilience of agriculture. They can take different forms depending on the production systems being considered. For example, sustainable agricultural production may include increases in productivity based on the sustainable management of ecosystem services and functions, diversification of agriculture, agroecological approaches and organic farming, the enhanced use of a diverse range of well-adapted crops

and livestock, and their varieties and breeds, and of associated biodiversity in agricultural systems, including pollinators, pest-control organisms and soil organisms that promote nutrient cycling, thereby reducing the need for or replacing chemical inputs. Biodiversity-friendly practices are an important aspect of maintaining the resilience, or the ability of productive systems to recover from stress or disturbance. They can also help to address the conservation and restoration of biodiversity.

Nature's contributions to people – Nature's contributions to people (a concept similar to and inclusive of ecosystem functions and services) refers to all the contributions from biodiversity to people's well-being or quality of life. The sustainable management of agriculture, aquaculture, fisheries and forestry is an essential element in ensuring the continued availability of nature's contributions to people and in particular food security.

Guiding Questions For National Target-Setting

Where are the main areas in the country used for agriculture, aquaculture, fisheries and forestry? Which areas are particularly important for biodiversity? Which areas are particularly important for economic reasons?

What measures are in place to ensure the sustainable management of agriculture, aquaculture, fisheries and forestry? How do these measures promote the use of biodiversity-friendly practices? How effective have these measures been? How could their effectiveness be improved? Which areas are not currently covered by any type of sustainable management? What are the opportunities and constraints to enhancing sustainable management? What are the potential ecological, economic, and social costs and benefits of enhancing sustainable management?

What biodiversity-related problems could be addressed through sustainable management? How could sustainable management be used to address the main threats to biodiversity?

Who are the actors that may be affected? How can they be involved and their needs addressed? What are the trade-offs to consider?

What additional resources (financial, human and technical) will be required to reach the national target? How can additional resources be raised? What are the possible sources for these resources?

TARGET 10: Summary and relation to EWR:

It is not known at the time of writing this document whether The Fisheries Act 2020 is directly relevant to inland freshwater fisheries such as those managed by Edgeley Park Angling Club, however, in terms of the planning application and in respect to guidance, is included here because, the act states:

(10)In this section—

“ecosystem-based approach” means an approach which—

(a)

ensures that the collective pressure of human activities is kept within levels compatible with the achievement of good environmental status (within the meaning of the Marine Strategy Regulations 2010 (S.I. 2010/1627)), and

(b)

does not compromise the capacity of marine ecosystems to respond to human-induced changes;

“precautionary approach to fisheries management” means an approach in which the **absence of sufficient scientific information is not used to justify postponing or failing to take management measures to conserve** target species, associated or **dependent species**, non-target species **or their environment**.

<https://www.legislation.gov.uk/ukpga/2020/22/section/1>
Fisheries Act 2020

Due to the adjacency of Reservoir #1 (Sykes Reservoir) to the planned car park construction, there may exist risk of immediate and long term damage from added pressures upon the ecosystem of the Sykes Reservoir itself. The variety and variability of animals, plants and micro-organisms used in these systems is an important aspect of biodiversity. The fishery may be subject to pollutants during construction directly or thereafter, in the form of dust, chemicals, spillage and litter. Litter may be of special concern with very heavy footfall incurred by the presence of a car park.

As already mentioned a fresh water ecosystem links EWR (the underground spring water rivulet), the reservoir's waters, and westward - the wider water-to-river system, ultimately leading to the sea. Eco-system based approaches and decisions should therefore be considered in respect to the planned application, the reservoirs, and the open stream which runs from EWR and alongside the reservoirs, it being integral to their function and the function of the eco-system there.

Consideration of the risks are important locally because, in regard to the reservoirs, activities associated with these production systems are important elements of human well-being and economic activity.

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

Restore, maintain and enhance nature's contributions to people, including ecosystem functions and services, such as the regulation of air, **water** and climate, **soil health, pollination** and reduction of disease risk, as well as protection from natural hazards and disasters, through **nature-based solutions and/or ecosystem-based approaches for the benefit of all people and nature.**

Importance

Nature's contributions to people, a concept similar to and inclusive of ecosystem services, refers to all the contributions from biodiversity to **people's well-being or quality of life**. These contributions take various forms, including material contributions, regulating services and other non-material contributions including spiritually and culturally. As a result of the ongoing decline of biodiversity, **nature's contributions to people are also in decline**, with **serious implications for human well-being and social cohesion**. The restoration, maintenance and enhancement of nature's contributions to people provides an important rationale for the conservation and sustainable use of biodiversity.

Explanation

This target calls for the **range of nature's contributions to people to be restored, maintained or enhanced by 2030** and places specific emphasis on the regulation of air, water and climate, soil health, pollination and reduction of disease risk, as well as protection from natural hazards and disasters. To accomplish this the target identifies nature-based solutions and/or ecosystem-based approaches as a specific approach to reaching this objective.

Nature-based solutions and/or ecosystem-based approaches - Nature-based solutions can be defined as actions to protect, conserve, restore, sustainably use and manage natural or modified terrestrial, freshwater, coastal and marine ecosystems, which address social, economic and environmental challenges effectively and adaptively, while simultaneously providing human well-being, ecosystem services and resilience and biodiversity benefits. Ecosystem-based approaches can be defined as the use of biodiversity and ecosystem services, particularly, as part of an overall strategy to help mitigate and adapt to the adverse effects of climate change.

Guidancing Questions For National Target-Setting

How are the contributions of biodiversity recognized in existing national policies, strategies and plans? How can the role of biodiversity be (further) recognised, supported and/or enhanced? What policy tools are in use or need to be considered?

What are the opportunities for and constraints to restoring, maintaining and enhancing nature's contributions to people? Consider potential ecological, economic, and social costs and benefits in specific ecosystems.

Who are the actors that may be affected by efforts to restore, maintain and enhance nature's contributions to people? How can they be involved and their needs addressed? What are the trade-offs to consider?

What additional resources (financial, human and technical) will be required to reach this target? How can additional resources be raised? What are possible sources?

TARGET 11: Summary and relation to EWR:

This interim target, agreed to and committed to by UK government, is concerned with the restoration, maintenance and enhancement of nature's contributions to people. The aim is to improve the quality of life and well-being of people and benefit nature by restoring, maintaining and enhancing ecosystems.

As a result of the ongoing decline of biodiversity, **nature's contributions to people are also in decline**, with **serious implications for human well-being and social cohesion**.

Edgeley is a deprived area when it comes to access to nature. Locally, EWR stands as a single well-situated viable option in giving the people of Edgeley (as well as other nearby areas of Stockport) access to ecosystem services which will contribute toward human well-being and social cohesion as well as stemming the decline of natural habitat and species abundance across the geographical spectrum.

Conversely, even with the application's 'retained area', and notwithstanding other negative issues, the construction of a car park upon EWR would remove and disturb too many variables and take away too much of the area for it to continue as a safe, secure location for nature to flourish to a degree that is meaningful locally and/or in adherence to commitments made by government and listed in this chapter.

Ecologists have established that EWR consists of woodland, scrub and grassland. These are three defined sub-systems, each of which are important for introducing and re-introducing people to nature. The sum of these sub-systems offer a range of beneficial contributions for and from nature. With enhancement, integral sub-systems such as these and EWR as a whole, provide the potential to offer the local community; educational, health, and respite services, as well as a rich variety of other general biodiversity services.

A nature-based solution/ecosystem-based approach (as advised by CBD and committed to by UK government) would aim to protect, conserve, restore, sustainably use and manage EWR in its entirety.

More of what a designated nature reserve can offer people is presented elsewhere in this document.

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

Significantly increase the area and quality, and connectivity of, access to, and benefits from green and blue spaces in urban and densely populated areas sustainably, by mainstreaming the conservation and sustainable use of biodiversity, and ensure biodiversity-inclusive urban planning, enhancing native biodiversity, ecological connectivity and integrity, and improving human health and well-being and connection to nature, and contributing to inclusive and sustainable urbanization and to the provision of ecosystem functions and services.

Importance

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. Further, green and blue spaces can provide important habitat for species, improve habitat connectivity, provide ecosystem services and help mediate extreme events, if managed with such objectives in mind. The target focuses on the importance of biodiversity-inclusive urban planning and making space for nature within built landscapes to improve the health and quality of life for citizens and to reduce the environmental footprint of cities and infrastructure. It also recognizes the dependency of urban communities on well-functioning ecosystems and the importance of spatial planning to reduce the negative impacts on biodiversity of urban expansion, roads and other infrastructure.

Explanation

The target aims to ensure biodiversity-inclusive urban planning, inter alia to increase the green and blue spaces within cities and other densely populated areas, in order to contribute to human well-being and the conservation of biodiversity in urban areas. To accomplish this, the target sets out a number of elements:

Green and blue spaces – These are areas of vegetation, inland and coastal waters, generally in or near to urban areas and other densely populated areas. 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. This could be accomplished in various ways, including by creating new green and blue spaces, better managing existing areas for biodiversity and health outcomes, and ensuring that such areas are accessible to people.

Biodiversity-inclusive urban planning – Urban planning is a technical and political process for managing the use of urban spaces. The target specifically calls for such processes to be biodiversity inclusive.

Mainstreaming – The target calls for the mainstreaming of biodiversity in the context of green and blue spaces and biodiversity-inclusive urban planning. Biodiversity mainstreaming is generally understood as ensuring that biodiversity, and the services it provides, are appropriately and adequately factored into policies and practices that rely and have an impact on it.

Guiding Questions For National Target-Setting

How is urban planning managed in your country? What processes are in place to plan and manage green and blue spaces? How can these be made more biodiversity-inclusive?

Who are the main actors involved, and what are their roles and responsibilities?

What planning decisions are (being) devolved to sub-national (state/province, city, municipal) governments? What implications does this have for action towards this target?

What are the opportunities for and constraints to increasing the area, quality, connectivity of, access to, and benefits from green and blue spaces? What are the potential ecological, economic, and social benefits and costs of taking action?

Who are the actors that may be affected? How can they be involved and their needs addressed? What are the trade-offs to consider?

What additional resources (financial, human and technical) will be required to reach the national target? How can additional funds be raised? What are possible funding sources?

TARGET 12: Summary and relation to EWR:

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

Take effective legal, policy, administrative and capacity-building measures at all levels, as appropriate, to ensure the fair and equitable sharing of benefits that arise from the utilization of genetic resources and from digital sequence information on genetic resources, as well as traditional knowledge associated with genetic resources, and facilitating appropriate access to genetic resources, and by 2030, facilitating a significant increase of the benefits shared, in accordance with applicable international access and benefit-sharing instruments.

Importance

The sharing of benefits that arise from the utilization of genetic resources and associated traditional knowledge is one of the three objectives of the Convention and a key pillar for the success of its implementation. It builds an equity dimension among countries providing and using biodiversity with the dual objective of providing incentives for conservation and sustainable use of biodiversity and mobilizing new resources redirected towards biodiversity. Access and benefit-sharing is included in several international instruments. Under the Convention, the framework for the implementation of its third objective is provided in Article 15. In addition, Article 8(j) contains provision to encourage the equitable sharing of the benefits arising from the utilization of knowledge, innovations and practices of indigenous peoples and local communities embodying traditional lifestyles relevant for conservation and sustainable use of biological diversity. The adoption of the Nagoya Protocol on Access and Benefit Sharing (ABS) created greater legal certainty, clarity and transparency for both users and providers of genetic resources and associated traditional knowledge. At COP 15 in December 2022, Parties agreed to develop a solution for the sharing of benefits arising from the use of digital sequence information (DSI) on genetic resources and established a way forward to advance the consideration of this issue under the Convention.

The International Treaty on Plant Genetic Resources for Food and Agriculture, in force since June 2004, has established the Multilateral System of Access and Benefit-sharing, which facilitates exchanges of plant genetic resources for the purposes of agricultural research and breeding to contribute to sustainable agriculture and food security, by providing a transparent and reliable framework for the exchange of crop genetic resources.

Explanation

This target has two main components. First, putting in place legal, policy and administrative measures on ABS, and secondly, putting in place capacity-building measures for ABS:

Legal, policy and administrative measures – Parties to the different ABS-related international instruments need to take legal, policy and administrative measures to implement them. This includes the need to put the necessary institutional structures in place and to take the necessary steps to comply with their international treaty obligations at the national level and to have a fully functional ABS system. This may include, for instance, administrative

measures for the issuance of permits or the functioning of the checkpoints, as applicable. This component has quantitative (having measures in place) and a qualitative (the measures being effective) subcomponents. These measures need to help achieve a significant increase in benefit-sharing. To do that, measures need to ensure the sharing of benefits in a fair and equitable manner and facilitate appropriate access to genetic resources.

Capacity-building measures – There is a need to build capacity on ABS at all levels. This includes capacity-building measures for ABS for genetic resources, DSI and associated traditional knowledge. Needs and challenges to achieve the issues addressed by this target have been identified on several occasions (e.g., documents on capacity building, decision NP-3/1 on assessment and review).

These components are further qualified as follows:

In accordance with applicable international access and benefit-sharing instruments – Applicable international access and benefit-sharing instruments which are relevant, or could be relevant in the future include the Nagoya Protocol on Access and Benefit Sharing, the International Treaty on Plant Genetic Resources for Food and Agriculture, the United Nations Convention on the Law of the Sea on the Conservation and Sustainable Use of Marine Biological Diversity of Areas Beyond National Jurisdiction. Further the target leaves room for considering new international ABS instruments as they may be developed. For example, relevant international instruments could be developed under the World Health Organization or the World Intellectual Property Organization in the future.

Guiding Questions For National Target-Setting

What international ABS treaties is your country a Party to? Is the country complying with all the obligations under these treaties? Are there other international treaties that the country should consider ratifying (for example the Nagoya Protocol or the International Treaty on Plant Genetic Resources for Food and Agriculture)?

What legal, policy and administrative measures to ensure the fair and equitable sharing of benefits are in place in the country? Are these measures effective (are benefits being shared)? If not, what are the underlying reasons? In what way could their effectiveness be improved?

What is the country's current level of capacity for ABS for genetic resources, DSI and associated traditional knowledge? What capacity-building needs exist and in which way could they be addressed? What can your country do to support the capacity-building of others?

What are the opportunities and constraints experienced in developing and implementing effective legal, policy, administrative and capacity-building measures for ABS? What are the potential ecological, economic, cultural, and social benefits and costs of taking action? Who are the actors that may be affected? What can be done to get them involved and ensure that their needs are addressed? What are the trade-offs to consider?

What additional resources (financial, human technical and technological) will be required to reach the national target? What can be done to raise additional resources? What are possible sources for these resources?

TARGET 13: Summary and relation to EWR:

This interim target, agreed to and committed to by UK government, is concerned with correlating information, sharing strategies, findings, existing knowledge and data related to efforts to protect restore and enhance biodiversity for the sake of nature and humankind.

Local government strategies and plans should involve the identification, mapping and designation of EWR and similar areas across Stockport.

Local government should develop robust, well connected, data, technology and information networks as part of nature recovery strategies so that local, regional, national and global communities can access knowledge, practices, ideas and be inspired by success and learn from failures in regard to these targets.

When it comes to planning applications and timelines, EWRG would suggest that the process be more transparent and enabled so that hundreds of pages of application papers can be analysed and responded to in a longer timeframe than is currently allotted.

EWRG also suggests that the capacity to upload documents to the 'comments' pages (as opposed to a limit of 2,000 words) relating to submitted planning applications is an essential democratic process. East Cheshire Council's model is an example to consider.

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

Ensure the full integration of biodiversity and its multiple values into policies, regulations, planning and development processes, poverty eradication strategies, strategic environmental assessments, environmental impact assessments and, as appropriate, national accounting, within and across all levels of government and across all sectors, in particular those with significant impacts on biodiversity, progressively aligning all relevant public and private activities, and fiscal and financial flows with the goals and targets of this framework.

Importance

Article 6 (b) of the Convention calls upon Parties, in accordance with their particular conditions and capabilities, to integrate, as far as possible and as appropriate, the conservation and sustainable use of biological diversity into relevant sectoral or cross-sectoral plans, programmes and policies. Such “biodiversity mainstreaming” seeks to ensure that the multiple biodiversity values are duly taken into account in decision- and policy-making of private and public actors, across governments, economic sectors and society more broadly. As many (if not most) activities that rely on biodiversity or have an impact on biodiversity are outside of the remit of biodiversity policies, implementing this target is critical for implementing the objectives of the Convention. Nevertheless, the multiple values of biodiversity are not widely reflected in decision-making. Integrating and reflecting the contribution of biodiversity and the ecosystem services it provides in relevant strategies, policies, programmes, and reporting systems is an important element in ensuring that the diverse values of biodiversity and the opportunities derived from its conservation and sustainable use are recognized and reflected in decision-making

Explanation

The aim of this target is to ensure that the values of biodiversity are fully reflected or mainstreamed in all relevant decision-making frameworks so that it is given proper attention in decision-making, leading to alignment of all activities, and of all financial flows, with the goals and targets of the framework. The target has several specific elements:

Multiple values – Biodiversity underpins a wide range of services that support economies, food production systems, secure living conditions and human health. In addition, biodiversity is central to many cultures, spiritual beliefs and worldviews and has intrinsic value. As such, biodiversity has multiple values, some of which can be quantified in monetary terms and others that are more abstract.

Policies, regulations, processes, strategies, assessments and national accounting – 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

All of government and sectors – Action to fully integrate biodiversity and its multiple values should be taken across all levels of government and across sectors, thus reflecting the fact that many decision-making frameworks, processes and policies that are relevant for biodiversity take place at different levels of public and private decision-making. The target further specifies that a specific focus should be given to those sectors that have significant impacts on biodiversity and that public and private fiscal and financial flows should be gradually aligned with the Kunming-Montreal Global Biodiversity Framework

Guiding Questions For National Target-Setting

What are the key national planning instruments and processes in place? How is biodiversity and its multiple values being reflected in these? What are the opportunities and constraints for doing so?

What gaps, in terms of instruments, legislation and processes, exist in reflecting the values of biodiversity in decision-making processes? How could these gaps be addressed?

How are the business and financial sectors being encouraged to reflect biodiversity and its multiple values in decision-making processes? How effective has this been? How could it be strengthened? What are the gaps/needs that exist?

What sectors are having significant impacts on biodiversity? How is biodiversity reflected in any associated decision-making processes? How effective has this been? How could it be strengthened? What are the gaps/needs that exist?

What are the potential ecological, economic, and social benefits and costs of integrating biodiversity and its multiple values into relevant decision-making processes? Who are the actors that may be affected? How can they be involved, and their needs addressed? What are the trade-offs to consider?

What additional resources (financial, human and technical) will be required to reach this target? How can additional resources be raised? What are possible sources?

TARGET 14: Summary and relation to EWR:

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 this section of this document.

*“..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.

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.

A more complete list of the legally binding targets are included in Part 3: *Ecology & Biodiversity*.

The full list of targets can be found at <https://www.cbd.int/gbf/targets>.

4.1.1.d. The Environment Act 2021

In England, the Environment Act 2021 includes **legally binding targets** for the government that will help the UK to meet its international commitments.

The UK is taking the decline of biodiversity and the resulting impact on society (communities, health, wellbeing and education) seriously.

Only by starting at local levels can anything change. Already an existing refuge for nature locally, with enhancement, EWR as it is now, offers real potential in contributing toward stemming species abundance decline nationally as well as offering a potential wealth of ecoservice benefits to people in Stockport.

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.

‘A Green Future: Our 25 Year Plan to Improve the Environment’ is examined in the following section. It is to be treated (by government at all levels) as an environmental improvement plan.

PART 6, Biodiversity objective and reporting, Section 102,
General duty to conserve and enhance biodiversity

(3) For subsections (A1) and (1) substitute —

“(A1) For the purposes of this section “the general biodiversity objective” is the **conservation and enhancement of biodiversity in England** through the exercise of functions in relation to England.

(1) A public authority which has any functions exercisable in relation to England must from time to time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective.

(1A) After that consideration the authority must (unless it concludes there is no new action it can properly take)—

(a) determine such policies and specific objectives as it considers appropriate for taking action to further the general biodiversity objective, and

(b) take such action as it considers appropriate, in the light of those policies and objectives, to further that objective

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

4.1.1.e. Recovering Nature: Our 25 Year Plan to Improve the Environment

According to 'The Environment Act 2021', 'Recovering Nature: 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.

Considering how environmental therapies could be delivered through mental health services:

We will consider how NHS mental health providers in England can establish new working arrangements with environmental voluntary sector organisations to offer appropriate therapies – such as gardening, outdoor exercise and care farming – in natural settings to people with mild to moderate mental health conditions and who may be struggling to overcome loneliness and isolation.

RN 25yr plan, ch3, p73

Actions the government will take:

- Considering how NHS mental health providers in England could work with environmental voluntary sector organisations to offer mental health therapies.
- Sharing lessons learned from existing social prescribing programmes widely so others can adopt best practice.
- Developing standardised tools for service providers to support the roll-out of social prescribing across England. We will do this by seed-funding a project, led by The Conservation Volunteers and supported by NHS England.

RN 25yr plan

Promoting health and wellbeing through the **natural environment**:

We will launch a three-year 'Natural Environment for Health and Wellbeing' programme, focused on supporting local authorities, health organisations, health professionals, teachers and planners in promoting the natural environment as a pathway to good health and wellbeing. Mental health problems and early interventions will be an initial area of interest,

however the programme will be charged with considering other health issues, such as obesity, where children and adults would benefit from better access to nature. To make sure that it reaches as many people as possible, we would welcome the programme being replicated at local level. Ideally, we would like access to the natural environment put at the heart of all local Health and Wellbeing Board strategies.

Actions the government will take include:

- Establishing a cross-government alliance on environment and health to design and oversee the 'Natural Environment for Health and Wellbeing' programme.
- Supporting the alliance to review evidence, develop tools and **support local authorities**, commissioners, and professionals.

Green infrastructure in urban areas:

Urban residents prize the parks, playing fields, woods, street trees and footpaths that make their district an attractive place. People in greener surroundings have longer and healthier lives. Green infrastructure brings wider benefits, including sequestering carbon, absorbing noise, cleansing pollutants, absorbing surface water and reducing high temperatures. The number and condition of green spaces has declined and current investment is confined to specific projects. We risk losing more good quality green spaces.

As we build more homes, preserving and creating green spaces in towns is more important than ever. Local authorities and developers need to take account of all the benefits when deciding how much land to allocate as green space.

RN, 25 yr plan, p79

The uplifting sights, sounds and smells of our natural and urban environments are **integral to our daily lives**. More fundamentally, **the environment is lifegiving**. It nourishes and nurtures all life, human, animal or plant. We rely on our blue and green spaces for food, water and the air we breathe. Each vital element is a gift from a healthy, wellfunctioning planet. In turn, we are healthier and feel better the more time we spend out and about **in the natural world**.

RN: 25yr PLAN , p15

The economic benefits that flow from the natural world and our natural heritage have begun to take a greater prominence in policy-making, thanks in part to the ground-break ing work of Professor Dieter Helm's Natural Capital Committee (NCC). We see these benefits in increased productivity from our natural resources and a lessening of the demands placed on them. We see them in the boost to our mental and physical wellbeing.

RN: 25yr PLAN , p16

The twenty-five year plan (to be treated as an environmental improvement plan prepared by the Secretary of State under Section 1. Pursuant of The Environment Act) to recover nature in the UK recognizes how time spent in the natural world is integral to human health and daily life. By providing and/or restoring, preserving and/or protecting wildlife habitats in ecologically deprived urban areas such as Edgeley, nature can contribute toward a healthier community as well as a healthier eco system. Walking beside a hazel lined hedgerow dividing a car park from industrial facilities or placing pit grown trees surrounded by cars, is NOT pursuant to 'additional wildlife habitat' because it is not true 'wildlife habitat' and it is NOT 'additional', nor can it contribute to 'time spent in nature'!

Conversely, it follows therefore, that with EWR gone or depreciated there will be no local 'natural world' of any reasonable size or potential to spend time in to 'feel better'.

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

The goals set out in the 25 year plan aim to achieve :

1. Clean air.
2. Clean and plentiful water.
3. **Thriving plants and wildlife.**
4. A reduced risk of harm from environmental hazards such as flooding and drought.
5. **Using resources from nature more sustainably and efficiently.**
6. **Enhanced beauty, heritage and engagement with the natural environment.**

RN, 25 yr plan, p23

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

RN: 25yr PLAN , p28

Government policies will focus on:

- Using and managing land sustainably
- Recovering nature and enhancing the beauty of landscapes
- Connecting people with the environment to improve health and wellbeing
- Increasing resource efficiency, and reducing pollution and waste
- Securing clean, productive and biologically diverse seas and oceans
- Protecting and improving the global environment

RN: 25yr PLAN , p23

All of these policies relate to EWR in one way or another. EWR is land that can be used and managed sustainably by the local community. Designating EWR as an urban nature reserve will contribute to the recovery of nature and enhance the local area. The idea for a gated nature reserve upon EWR will connect people with the environment to improve health and wellbeing through activities, education and local food production.

A decision to deny permission for a car park upon EWR will increase and encourage resource efficiency (in terms of more eco-efficient modes of travel and use of existing and potential biodiversity services) and will contribute toward reducing pollution in terms of air quality by encouraging other forms of more eco-friendly travel and in terms of integral water systems by minimizing the risk of negative effects upon the spring water rivulet and the reservoirs and wider river system, from chemicals, spillages, dust, pollutants used during construction and litter from heavy footfall during use after construction. Protecting, restoring and enhancing EWR as a whole will contribute toward improving the global environment and still allow ecologically concerned peoples and businesses to enhance other areas of the locality freely in what would constitute true **additions** to positive biodiversity measures.

Using and managing land sustainably:

Many people in urban areas would also like to enjoy the sights and sounds of British wildlife. Many people in urban areas would like, need, and would benefit from, the local opportunity to experience an oasis of natural habitat for many reasons. Some may like to see or sow wild flowers away from the bricks and mortar and concrete which surrounds them. Some would like to experience hearing the wind rustle among long grasses in a natural setting. Britain's wildlife and habitat cannot begin to recover from its shocking decline in abundance and 'thrive' where there is nowhere left for it to 'thrive'.

Engagement with the beauty of natural environments is beneficial to health and wellbeing. Natural environments are also a great source of education. Activities connected with the enhancement, management and involvement of and within natural environments can lead to more cohesive communities.

Enhanced beauty and engagement with the natural environment cannot be established in Edgeley with the creation of a car park. Enhanced beauty can be established anywhere in Edgeley including EWR but, as it stands, in Edgeley, engagement with anything resembling a natural environment of any reasonable scope can only be established in EWR.

Recovering nature and enhancing the beauty of landscapes:

i. Publishing a Strategy for Nature

*We place the **utmost importance on our commitments to biodiversity and nature conservation** under international agreements such as the Convention on Biological Diversity (CBD).*

ii. Developing a Nature Recovery Network

*Through changes in the way we manage our land, we will develop a Nature Recovery Network providing 500,000 hectares of **additional** wildlife habitat, more effectively linking existing protected sites and landscapes, **as well as urban green and blue infrastructure**.*

*As well as helping wildlife thrive, the Nature Recovery Network could be designed to bring a wide range of **additional** benefits: greater public enjoyment; pollination; carbon capture; water quality improvements and flood management.*

RN: 25yr PLAN , p58

Removing true existing wildlife habitats to replace them with car parks cannot achieve the same additional benefits. It is contradictory to creating '**additional** wildlife habitat'. Mitigation and compensation delivered piecemeal cannot re-create adequately sized wildlife habitat or benefit local communities in the same ways.

Putting the environment first and providing richer habitats are key policy actions and commitments government is legally bound to. Respecting nature's intrinsic value is a critical aspect of the government's mission in establishing the recovery of nature in the UK and improving our environment so that people can enjoy it.

*In order to help leave the environment in a better condition for the next generation, we need to **restore and create** areas of wetland, **woodland, grassland** and coastal habitat, to provide the greatest opportunity **for wildlife to flourish** and to promote the **wider economic and social benefits that healthy habitats offer**.*

RN: 25yr PLAN , p57

Restoring and creating woodland and grassland is not synonymous with mitigation and compensation. The greatest opportunity for wildlife to flourish cannot be achieved by destroying existing woodland, grassland and scrub in favour of car parks and fragmented and piecemeal mitigation strategies.

Connecting people with the environment to improve health and wellbeing:

Pursuant with legally binding commitments established in The Environment Act 2021 and the targets referred to in pages 8 to 22 of this part (Part 4: *Community, Health & Education*) and pages 15 to 59 of Part 3: (*Ecology & Biodiversity*) government is committed to taking action toward establishing the following policies:

- Helping people improve their health and wellbeing by using green spaces including through mental health services.
- Encouraging children to be **close to nature, in and out of school, with particular focus on disadvantaged areas.**
- ‘Green’ our towns and cities by **creating green infrastructure** and planting one million urban trees.

RN: 25yr PLAN , p71

Government also remains bound to commitments to *“help children and young people from all backgrounds to engage with nature and improve the environment.”*

Spending time in the **natural environment** – as a resident or a visitor – improves our mental health and feelings of wellbeing. It can reduce stress, fatigue, anxiety and depression. It can help boost immune systems, encourage physical activity and may reduce the risk of chronic diseases such as asthma. It can combat loneliness and bind communities together.

RN: 25yr PLAN , p71

Promoting the wider economic and social benefits that healthy habitats can offer can only be achieved if the habitats exist in the first place, are created, or are restored.

EWR exists. There is nowhere else and no opportunity anywhere else in Edgeley to enhance, restore, or create wildlife habitat of any meaningful size or degree. EWR is situated in an ideal place for designation and already possesses natural elements. It is beside a gated reservoir; it is the site of a natural spring water rivulet; it contains woodland, grassland and scrub; it is connected to as-of-yet undesignated green corridors; it is in the local area and within walking distance of 8 primary schools, many of which have little, and some no, green space on site; and it is close to a natural habitat deprived urban centre with high levels of mental and physical health diagnosis.

4.1.1.f. Biodiversity 2020: A strategy for England's Wildlife and Ecosystem Services

Biodiversity 2020: A strategy for England's wildlife and ecosystem services was published by the UK Department for Environment, Food and Rural Affairs (Defra). It sets out a vision and a mission, along with desired outcomes hoped to be achieved by 2030.

The aims, ambitions and priorities of the strategies implemented are widescale and landscape based. However, landscape scale projects require building blocks established at local level. The criteria and aspects included in this strategy can also be applied to local projects or can be used to establish a basis for participation in larger projects such as NIAs or equivalent in the future. Priorities at landscape level reflect those of the building blocks of such schemes at local level. Removing those building blocks and their potential will permanently negatively effect the long term strategy for the recovery of England's wildlife and ecosystem services.

The National Ecosystem Assessment (NEA) established that the natural world and its ecosystems are critically important to our **wellbeing and economic prosperity** but are consistently undervalued in conventional analyses and decision-making. Actions taken and decisions made now will have consequences far into the future for ecosystems, **ecosystem services** and **human wellbeing**. It is important that these consequences are understood, so that we can make the best possible choices for present and future generations.

*We fully recognise the importance of people in helping to arrest the loss of species. We must ensure that the **value of nature's services** is better understood and **enhance people's personal connection with wildlife and nature**. Ultimately, conservation efforts can only truly succeed **with society's support**. This strategy provides the national framework for action to help us collectively achieve our goals. We need to work together, in partnership, to put this into practice, for the sake of England's wildlife, but **also for ourselves and for future generations**.*

Biodiversity 2020, pages 2-3

*The mission for this strategy, for the next decade, is: to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with **more and better places for nature for the benefit of wildlife and people**.*

Biodiversity 2020, p4

*Establishing a **new green areas designation**, empowering communities to protect local environments that are important to them.*

Biodiversity 2020, p5

*We also need to take better account of **how much nature does for us**. Biodiversity provides **a range of benefits to people**, but these are often not taken into account in decision-making. This is often because biodiversity benefits are outside the market economy, meaning that they are unpriced and therefore too easily ignored in financial decisions. This strategy therefore draws on the Natural Environment White Paper, and aims to ensure that **the value of biodiversity is reflected in decision-making** in the public and private sector.*

*We need to **ensure biodiversity is taken into account by decision-makers** within sectors which have the greatest direct influence on our biodiversity, and we need to reduce direct pressures on our biodiversity.*

***Planning and Development** – Through reforms of the planning system, we will take a strategic approach to planning for nature. We will **retain the protection and improvement of the natural environment as core objectives** of the planning system.*

Biodiversity 2020, p6

Habitats and ecosystems on land:

Biodiversity in Britain continues to decline. Reviews of England's wildlife sites and ecological network, *Making Space for Nature* chaired by Professor Sir John Lawton and *The Latest State of Nature Report 2023*, reveal that England's collection of wildlife areas (both legally protected areas **and others**) are now failing to be coherent and resilient ecological networks.

Making Space for Nature concludes that establishing a functional ecological network would effectively conserve biodiversity and **ecosystem services**, delivering **many benefits to people**, while also making efficient use of scarce land and resources. It recommended that priorities in England should include **better, more, bigger** and joined sites for nature. Ecological networks are considered to be an effective means to conserve ecosystems and wildlife in environments, such as England, that have become fragmented by human activities. We need to extend this approach much more widely.

Biodiversity 2020, p6 / Defra

People:

People value the natural world in many different ways and for different reasons. These include valuing it for its own sake (sometimes called its 'intrinsic' or 'existence' value), because it makes our streets and gardens more attractive, or because **people enjoy experiencing nature-rich green places** for recreation, whether a walk in a park or in relatively wild places such as National Parks. Others enjoy bird watching, or activities such as angling or wildfowling. Evidence supports what many people feel instinctively – that regular **opportunities to experience natural environments have quantifiable positive impacts** on our **mental and physical health**. A host of other ecosystem services are also becoming better understood. All can motivate people to take or support positive action for biodiversity.

Biodiversity 2020, p6 / Defra

We need to better take account of the values of biodiversity in decision-making. There is potential to expand and establish new markets and financing approaches for nature's services.

Priorities:

Priority action: Establish more coherent and resilient ecological networks on land that safeguard ecosystem services **for the benefit of wildlife and people.**

The *Making Space for Nature* review summarised what needs to be done to establish a more coherent and resilient network in 4 words, which describe our ambitions under this priority: **better, bigger, more and joined.**

Better

We will improve the quality of priority habitat both within and outside protected sites, including where appropriate, by improving the heterogeneity and structural diversity of habitats which in turn will provide suitable niches for a wider range of species and enhance resilience to climate and other environmental change. The *Making Space for Nature* review concluded that the first priority is to protect and enhance the quality of existing priority habitat. It is much harder, more expensive and not always possible to re-create habitat than it is to look after what we currently have.

Bigger:

We will increase the size of remaining areas of priority habitat where appropriate

More:

We will create new areas of priority habitat where appropriate

Joined:

We will enhance ecological connections between, or join up, existing areas of priority habitat, increasing opportunity for wildlife to move around the landscape by making use of 'stepping stones', 'corridors' and other features

Biodiversity 2020 ,p20

Priority action: Take targeted action for the recovery of priority species, whose conservation is not delivered through wider habitat-based and ecosystem measures

We, through Natural England, will agree a prioritised programme with our partners, allocating responsibilities for recovery action for the species. Greatest priority will be given to species at most risk of extinction, and those for which England has a particular international responsibility, for example, species that are endemic or which are threatened at European or global scales. We will work with a range of public bodies and authorities to **encourage community action**, including by **supporting communities** in 'adopting' locally-relevant species.

Priority action: Work with the biodiversity partnership to **engage significantly more people in biodiversity issues**, increase awareness of the value of biodiversity and increase the number of people taking positive action

Action to **get more children learning outdoors**, removing barriers and increasing schools' abilities to teach outdoors. The Natural Connections initiative provides an example of Natural England and the nature conservation sector coming together to try to become more effective in engaging schools through a collaborative approach;

A new green areas designation, **empowering communities to protect local environments** that are important to **them**

Help for public bodies to fulfil their duty under the Natural Environment and Rural Communities Act 2006 to take account of biodiversity, by developing tools and guidance for them to use, and by raising the profile of this duty with Parish Councils.

Priority action: Promote taking better account of the values of biodiversity in public and private sector decision-making, including by providing tools to help consider a wider range of ecosystem services

The consideration of **nature's value** in all relevant Impact Assessments. Later in 2011 we will publish new supplementary guidance to the Treasury's Green Book for use by all Government Departments on valuing the natural environment in appraisals.

Priority action: Through reforms of the planning system, take a strategic approach to planning for nature **within and across local areas**. This approach will guide development to the best locations, encourage greener design and enable development to enhance natural networks. We will retain the protection and improvement of the natural environment as core objectives of the planning system

Although affecting a much smaller proportion of the land each year than agriculture, development (including for urbanisation, infrastructure and industrial use) can also drive ecosystem and biodiversity change as a result of a range of direct effects, such as land take, and indirect effects, such as fragmentation of habitats and degradation, for example, due to water abstraction or pollution.

The Government expects the planning system to deliver the homes, business, infrastructure and thriving local places that the country needs, while **protecting and enhancing the natural** and historic environment. Planning has a key role in securing a sustainable future. However the current system is costly and bureaucratic with excessive central control, preventing **local communities** from shaping development in their neighbourhoods. It is also failing to achieve the kind of integrated and informed decision-making needed to support sustainable land use. **We must enable communities** to achieve lasting growth in a way that meets all of their needs: economic, social **and environmental**.

We will retain protection and improvement of the natural environment as core objectives for **local planning** and development management. The planning system will continue to facilitate coherent and resilient ecological networks in association with local partners and reflect the value of natural systems.

How EWR can meet aims, ambitions and priorities of Biodiversity 2020:

Stockport, through EWR, has the opportunity to inspire people through an enhanced experience of the natural environment. EWR as it is today offers opportunities to establish and improve ecological networks by protecting and enhancing and connecting an existing wildlife site in terms of the wider strategy to benefit nature, people and the local community. It holds the potential to meet shared visions for the natural environment among a wide partnership of local people, including statutory and voluntary sectors.

A designated nature reserve upon EWR can benefit the people of Edgeley and surrounding areas and communities, whilst at the same time contributing to ecological networks extending elsewhere into and ultimately out of urban areas.

EWR is also a win-win opportunity offering multiple benefits, such as for: the water environment and Water Framework Directive objectives and the low-carbon economy.

As well as perfectly meeting legally binding targets and commitments set by the CBD, on a local level, EWR can meet the aim of the Biodiversity 2020 strategy by protecting, restoring and enhancing habitat in ways that can contribute to the strategic plans and ambitions the government have implemented.

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 greenspaces for purposes of health and wellbeing.

4.1.1.g. Local Authority Commitments

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.

*We, subnational governments, cities and local authorities - as participants and contributors to the Edinburgh Process for Subnational and Local Governments on the development of the post-2020 global biodiversity framework, and supported by the Secretariat and some Parties to the Convention on Biological Diversity - are deeply concerned about the significant implications that the loss of biodiversity and climate change has on our livelihood **and communities**. The impacts on our environment, infrastructure, economy, **health and wellbeing**, and **our enjoyment of nature** are already visible. Indeed, the COVID-19 global pandemic has reminded us **how important it is to live in harmony with nature**. Healthy biodiversity and the ecosystem services that it provides are **key for human well-being and to build the resilience of our cities and regions**, both during and after the pandemic, and **it should be central to our recovery**.*

Signed by: Councillor Tracey Rawlins, Executive Member for Environment, Manchester City Council (England), 13 October 2021.

Signed by: Andy Burnham, Mayor, Greater Manchester Combined Authority (England), 28 March 2022

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.

This document presents alternatives and suggestions for consideration in Part 7: *Alternatives*.

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 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**, covered more thoroughly in Part 3 of this document: *Ecology & Biodiversity*, Greater Manchester's Local Wildlife Recovery Strategy is aimed at establishing ways of stemming habitat loss, protecting existing areas and improving biodiversity in what amounts to a dual effort to improve the health of our natural heritage and our communities.

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.

The designation of any natural wildlife habitat areas that can be protected and enhanced should be paramount in local town planning. Likewise, it should be expected that local authorities within Greater Manchester, such as Stockport, being in a position of access to modes of inter and intra department communication, would notify GMCA of any such sites/areas existing within local boundaries.

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

An email was sent to a conservation officer at Stockport Council’s planning department before these commitments were drawn up, shortly before Stockport County Football Club leased EWR, and before plans to extend Edgeley Park stadium were publicly known, proposing that the land that comprises EWR be considered as a Nature Reserve.

The authors and supporters of this document (Edgeley Wildlife Reserve Group) request that “*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, pursuant of Defra’s advice (previous page) in order to remain in line with existing statutory regulation and guidance.

As part of GMCA, Stockport Metropolitan Borough Council are required to fulfil legally binding commitments and statutory regulation.

As already considered in Part 3 of this document: *Ecology & Biodiversity*; 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.

Stockport:

Public authorities who operate in England **must consider what they can do to conserve and enhance biodiversity** in England. This is the strengthened 'biodiversity duty' that the Environment Act 2021 introduces. As a public authority, SMBC are duty bound to consider what they can do to **conserve and enhance** biodiversity. Conserving and enhancing biodiversity is **not** the same as mitigating or compensating for its loss.

SMBC should be implementing policies and objectives and acting to deliver strategies to achieve goals which meet national and global legally binding commitments.

SMBC is obliged to initiate strategies concerned with **local nature recovery**, species conservation and protected sites in order to meet its duty according to the Environment Act 2021.

SMBC must agree what its priorities are concerning the recovery of nature in Stockport and map the existing most valuable areas .

SMBC should be mapping/identifying specific areas for the **creation and enhancement of habitat for nature** and wider reaching environmental goals. The creation and enhancement of natural habitat is **not** the same as mitigating or compensating for its loss.

The government has advised local authorities to consider being involved in contributing by acting on proposals to **create or improve habitat on land they own** or manage., or helping someone else to do so.

SMBC is expected to commit to species conservation strategies aimed at safeguarding the future of the species that are at greatest risk. SMBC is expected to commit to protected site strategies by taking a new approach in **protecting** and **restoring** species and **habitats** in protected sites. **Protecting** and **restoring** species and **habitats** is **not** the same as mitigating or compensating for their loss. **Restoring habitats** is not the same as restoring species. Restoration of species will often require restoration of habitats. Thus, the need for more and better protected or otherwise, designated, sites.

The successful implementation of local government strategies pursuant to national government guidelines and legislature will contribute to legally bound commitments aimed at achieving goals and targets relating to the biodiversity crisis. Stockport are duty bound to help achieve a decline in species abundance, to increasing abundance to non-critical levels and to restoring or creating a range of rich wildlife habitats.

A Natural Capital approach is suggested in devising biodiversity strategies. This involves a greater consideration of the services which the ecosystem provides in benefiting people **and communities** including in **wellbeing, education, health and social cohesion** as well as **local production and the wider economic** knock-on effects.

When engaged in development plans and decisions, SMBC is advised to **consider its biodiversity duty** when complying with requirements related to strategic environmental assessments, environmental impact assessments and habitats regulations assessments.

SMBC is expected to consider how it manages land to improve biodiversity. Improving biodiversity is **not** the same as mitigating or compensating for its loss.

In order to meet commitments to improve biodiversity, the state of nature, and the environment, locally and nationally; national government advises that local governments such as SMBC **create habitats for wildlife and 'nature corridors'** that connect existing habitats. The creation of natural habitat is **not** the same as mitigation or compensation for its loss.

In order to meet commitments to improve biodiversity, the state of nature, and the environment, locally and nationally; national government advises that local governments such as SMBC **create dedicated spaces for wildlife**. The creation of dedicated spaces for wildlife is **not** the same as mitigation or compensation for its loss.

National advise, pursuant to local authority commitments, advises using legislation to protect sites such as local nature reserves.

Protecting, restoring, enhancing and dedicating EWR as a local nature reserve would meet all of the guidelines suggested.

Compensating or mitigating for the loss of half of it would meet none.

4.1.1.h. National Planning Policy Framework (NPPF)

Part 3: *Ecology & Biodiversity* of this document covered legally binding commitments which national and local authority are duty bound to honour. Many of them are directly related to **health, wellbeing and community cohesion**. This section revisits some of the legally binding commitments which are focused upon local communities and health.

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

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 / Commitments - National*.

The National Planning Policy Framework (NPPF) states that Local Plans must pass 4 tests of soundness before they can be considered appropriate for adoption. Planning Aid England has explained these tests, which set out that a plan must be:

1. Positively prepared

The plan should seek to meet the area's development needs. In preparing the plan we also have to consider if it would be sustainable to help meet the needs of other nearby areas.

2. Justified

*The plan should set out an appropriate strategy for future development. It must be based on **evidence**. It should be the result of considering a range of reasonable alternatives.*

3. Effective

The plan should be capable of being delivered, including through joint working with other councils where required.

4. Consistent with national policy

*The plan **should deliver sustainable development and conform with the NPPF** and other national planning policy.*

<https://www.stockport.gov.uk/about-the-stockport-local-plan/the-national-planning-policy-framework-nppf>

Alternative ecosystem development needs and access to ecosystem services for the Edgeley community and surrounding areas are discussed throughout this document. A healthy biodiverse environment, access to natural space, connection with nature, the opportunity to exercise self-sustainability, the option to participate to society and biodiversity in sustainable ways and with activities connected to nature and the natural world are all important aspects of a healthy society. In terms of Edgeley, a community deprived in many ways; the need for development of meaningful (in size and scope) of natural sites and the resulting ecoservices is blindingly obvious.

National policy, as pursuant with The Environment Act, stipulates considerations relating to the declared biodiversity crisis and meeting legally binding commitments described in part in this chapter (Part 4: *Community, Health & Education / Commitments - National & Local Government*) and in full in Part 3: *Ecology & Biodiversity / Commitments - National*.

The idea for the designation and thereafter enhancement of a nature reserve at EWR is provided in Part 3 of this document: (*Ecology & Biodiversity*) and some alternatives to the outline part of the planning application (Ref: # DC/092211) are presented in Part 7: *Alternatives*.

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. Edgeley is already deprived of such space.

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

*a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

NPPF, 2023, p5

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. Benefits to health and wellbeing of such spaces have been recognised across a spectrum of health and governmental bodies. In the long term benefits can also be measured economically. For example, in preventative terms, such spaces contribute to health and wellbeing which minimizes the impact upon economy and spending within the NHS infrastructure.

Sustainable solutions would include protecting and enhancing natural environment according to legally binding commitments 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:

Plans and decisions should apply a presumption in favour of sustainable development.

For **plan-making** this means that:

*a) all plans should promote a sustainable pattern of development that seeks to: meet the **development needs of their area**; align growth and infrastructure; **improve the environment**; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

*i. the **application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area**; or*

The policies referred to are those in this Framework (rather than those in development plans) relating to: **habitats sites** (and those sites listed in paragraph 187) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, **Local Green Space**, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; **irreplaceable habitats**; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 72); and areas at risk of flooding or coastal change.

*ii. any adverse **impacts of doing so would significantly and demonstrably outweigh the benefits**, when assessed against the policies in this Framework taken as a whole.*

For **decision-taking** this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

*i. the application of **policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed**; or*

*ii. any adverse **impacts of doing so would significantly and demonstrably outweigh the benefits**, when assessed against the policies in this Framework taken as a whole.*

NPPF, 2023, p6

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. 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.

The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.

NPPF, 2023, p6

Plan making - Strategic Policies

Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;*
- b) infrastructure for **transport**, telecommunications, security, waste management, water supply, **wastewater**, **flood risk** and coastal change management, and the provision of minerals and energy (including heat);*
- c) community facilities (such as **health, education and cultural infrastructure**); and*
- d) **conservation and enhancement of the natural**, built and historic environment, including **landscapes and green infrastructure**, and planning measures to address climate change mitigation and adaptation.*

NPPF, 2023, p9

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*)

In terms of conservation, provision for EWR, for the benefit of people and the community as well as for ecological reasons, should be essential in regard to strategic policies relating to spatial planning for Edgeley. (See Part 3: *Ecology & Biodiversity*)

Plan making - Non-strategic policies

*Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include **allocating sites**, the provision of infrastructure and community facilities at a local level, establishing design principles, **conserving and enhancing the natural** and historic environment and setting out other development management policies.*

NPPF, 2023, p10

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*)

Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies

NPPF, 2023, p10

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. The designation of EWR as a nature reserve meets legally binding commitments at improving biodiversity for the sake of nature and local communities.

Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently.

NPPF, 2023, p10

Plan making - Preparing and reviewing plans

*The preparation and review of all policies should be underpinned by relevant and **up-to-date evidence**. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.*

*Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, **social and environmental objectives** (including opportunities for net gains). Significant **adverse impacts on these objectives should be avoided** and, wherever possible, **alternative options which reduce or eliminate such impacts should be pursued**. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).*

NPPF, 2023, p11

Notwithstanding duty to legally binding commitments toward the Biodiversity Crisis, 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) (See Part 7: Alternatives)

Plan making - Examining plans

Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs¹⁹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

*d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

NPPF, 2023, p11-12

Local plans and spatial development strategies should have assessed that the local area (Edgeley) and its community 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 of 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 figure of 150-200 out of 19,750 people.
(See Part 7: *Alternatives*)

Decision Making Pre-application engagement and front-loading

The right information is crucial to good decision-making, particularly where formal assessments are required (such as Environmental Impact Assessment, Habitats Regulations assessment and flood risk assessment). To avoid delay, applicants should discuss what information is needed with the local planning authority and expert bodies as early as possible.

NPPF, 2023, p13

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 implications of developing the area have not been examined (See Part 5: *Water, Drainage & Flooding*). The existing quality and potential scope of the area of EWR in regard to ecological surveying was lacking (see Part 3: *Ecology & Biodiversity*). Neither was the lone representation of EWR as viable habitat in the context of the local area and its community considered in context of legally binding commitments to recover nature and improve biodiversity at local and community levels.

Decision making - Determining applications

In the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:

a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and

b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.

NPPF, 2023, p14

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) or alternatives which emerging Local Plans, Local Nature Recovery Strategies and Biodiversity Action Plans are obliged to consider to meet legally binding commitments (see Part 7: *Alternatives*).

Decision making - Tailoring planning controls to local circumstances

The use of Article 4 directions to remove national permitted development rights should:

a) where they relate to change from non-residential use to residential use, be limited to situations where an Article 4 direction is necessary to avoid wholly unacceptable adverse impacts (this could include the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability, but would be very unlikely to extend to the whole of a town centre)

*b) in other cases, be limited to situations where an Article 4 direction is necessary to **protect local amenity or the well-being of the area** (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities)*

*c) in all cases, be based on robust evidence, and apply to the smallest geographical area possible. Similarly, planning conditions should not be used to restrict national permitted development rights unless there is **clear justification** to do so.*

NPPF, 2023, p15

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.

Promoting healthy and safe communities

Planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which:

*a) **promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other** – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of beautiful, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and

*c) **enable and support healthy lifestyles**, especially where this would address identified **local health and well-being needs** – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.*

NPPF, 2023, p28

To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;

*b) take into account and support the delivery of local strategies to **improve health, social and cultural well-being** for **all** sections of the community;*

c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;

d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and

e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

NPPF, 2023, p28

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

well as activities which such reserves can provide. Access to such areas should be one of the priorities considered in town planning.

Planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. Local planning authorities should use their planning powers to help deliver estate regeneration to a high standard.

It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and

b) work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

NPPF, 2023, p28-29

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

*Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the **health and well-being of communities**, and can deliver wider benefits for **nature and support efforts to address climate change**. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and **opportunities for new provision**. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.*

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

NPPF, 2023, p29-30

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.

Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

The Local Green Space designation should only be used where the green space is:

a) in reasonably close proximity to the community it serves;

b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

c) local in character and is not an extensive tract of land.

Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

NPPF, 2023, p29-30

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 and the as-of-yet undesignated green corridor provided by the railway embankment reaching southward.

Promoting Sustainable Transport

Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) **opportunities to promote walking, cycling and public transport use are identified and pursued;***
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – **including appropriate opportunities for avoiding and mitigating any adverse effects,** and for net environmental gains; and*
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.*

*The planning system should actively manage patterns of growth in support of these objectives. **Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.** This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.*

NPPF, 2023, p31-33

Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;*
- b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;*

c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;

d) provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);

e) provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements; and

f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy.

NPPF, 2023, p31-33

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. Local plans and spatial development strategies should identify that reasonable alternatives to the car park in question would involve convincing, encouragement of, or incentives for; use of public transport for an average figure of 150-200 out of 19,750 people. The figure is based upon the number of car users that would utilize the car park which would be built upon EWR during any given event.

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 modes of transport (See Part 7: Alternatives).

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 existing 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

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

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 for the sake of nature and local community.

*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 is for a gated nature reserve offering ecoservices to local community (including food production growing beds); social participation activities; flood risk prevention and mitigation; 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**);*

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.

and

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;***

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.

Achieving Well-Designed and beautiful Places

Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

*C) are **sympathetic to local character and history**, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

*f) create places that are safe, inclusive and accessible and which **promote health and well-being**, with a high standard of amenity for existing and future users; and where crime and **disorder, and the fear of crime**, do not undermine the quality of life or community cohesion and resilience.*

NPPF, 2023, p39-41

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*

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

For ecological reasons, especially in view of health and wellbeing benefits of local communities, 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 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 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.

*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 and to the Edgeley community, in terms of environmental value and in terms of potential for establishing a basis for ecoservices related to health and wellbeing and education.

Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 182), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

NPPF 2023, p52-53

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*

*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.***

Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

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;***

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. The loss of EWR or any part of it would greatly impact the scope of potential human benefits which can be provided by ecosystem services.

*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

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.*

NPPF 2023, p55-56

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

4.1.2. Nature and Health

We know that many people living and working in dense urban environments have limited connection with nature or perceive it to be something which is only found in the countryside. Whether we are connected with nature or not, it is beneficial to us all. Some benefits are fundamentally obvious – the air we breathe, the water we drink and the food we eat are all ultimately reliant upon a healthy natural environment. Increasingly, health professionals and researchers are recognising the benefits of true natural spaces in contributing to healthy people and healthy societies.

Nature is an important need for many and vital in keeping us emotionally, psychologically and physically healthy.

General Health

Spending time in the natural environment – as a resident or a visitor – improves our mental health and feelings of wellbeing. It can reduce stress, fatigue, anxiety and depression. It can help boost immune systems, encourage physical activity and may reduce the risk of chronic diseases such as asthma. It can combat loneliness and bind communities together. A wide range of activity is under way to help people experience these benefits. A number of outdoor sports and leisure organisations, green space managers, environmental organisations and schools encourage people to participate in activities in green spaces.

The forest school approach encourages children to explore nature and have a relationship with the outdoors. The new science and geography curriculum and qualifications encourage pupils to undertake fieldwork as part of their course of study.

25 yr Environment Plan / UK Govt / p71

However, there is more to do. The number of people who spend little or no time in natural spaces is too high. Recent data from the Monitor of Engagement with the Natural Environment survey tells us that some 12% of children do not visit the natural environment each year. In the most deprived areas of England, people tend to have the poorest health and significantly less green space than wealthier areas.

In healthcare and school settings, and despite some excellent examples of pioneering practice, the possible benefits of contact with nature to promote good mental health or support early interventions for mental health problems are often overlooked.

25 yr Environment Plan / UK Govt / p72

Some health professionals have adopted a practice known as ‘green prescribing’, a type of social prescribing where naturebased interventions are used to treat people with health

conditions. Examples of interventions include gardening, conservation, care farms and green gyms.

25 yr Environment Plan / UK Govt / p72

Mental Health

This report provides a summary of the evidence of how and why our relationship with nature is so important and beneficial to our mental health. The report highlights the unequal access to nature's benefits for specific groups and the steps needed to address that inequality.

www.mentalhealth.org.uk

Our relationship with nature – how much we notice, think about and appreciate our natural surroundings – is a critical factor in supporting good mental health and preventing distress.

When it comes to mental health benefits, nature has a very wide definition. It can mean green spaces such as parks, woodland or forests as well as blue spaces like rivers, wetlands, beaches or canals. It also includes trees on an urban street, private gardens, verges and even indoor plants or window boxes. Surprisingly, even watching nature documentaries has been shown to be good for our mental health. This is great news as it means the mental health benefits of nature can be made available to nearly every one of us, no matter where we live.

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

Mental Health & Nature 2021 / Mental Health Foundation

There are ways that we can develop our connectedness with nature. Activities that involve the senses can help to develop our connection with the natural world, as can activities where we feel emotions such as compassion, perceive beauty or find meaning in nature.

Mental Health & Nature 2021 / Mental Health Foundation / p4

Research shows that people who are more connected with nature are usually happier in life and more likely to report feeling their lives are worthwhile.

Mental Health & Nature 2021 / Mental Health Foundation / p5

Whilst nature can be found anywhere, high-quality nature spaces which we know are most likely to help support good mental health are not available equally to everyone in the UK. This is a more complicated picture than just how far we live from a high-quality nature space.

Proximity is certainly a factor, with deprived communities least likely to live near a high quality nature space. Perhaps unsurprisingly, our poll found that people living in urban areas were less likely than rural residents to connect with nature as much as they wanted, and people without gardens less likely than those with gardens.

Younger adults in particular may face many barriers to connecting with nature. People living with a disability or health condition often face particular barriers to access, when natural spaces are not equipped with inclusion in mind or there is a lack of accessible routes.

For some groups, including many women, younger people, disabled people and people from ethnic minorities, nature spaces may feel inaccessible or less enjoyable because they are not safe – from risk of physical harm, sexual harassment, hate crime or discrimination. For many of these groups there is a double effect of this inequality.

Mental Health & Nature 2021 / Mental Health Foundation / p5

4.1.2.a. Connecting With Nature - Lessons to be Learned

The idea behind creating a nature reserve at EWR incorporates use of a section for raised growing beds for local community groups and primary schools to utilize. This means that EWR as a gated nature reserve would be able to provide all the benefits listed below. Access to self-grown food is access to sustainable living and in correctly managed circumstances can benefit the local high street with locally grown produce as well as a range of other benefits.

Studies from the United States of America

Community Gardens for Health

Inner-city neighbourhoods often are at a disadvantage when it comes to finding healthful, nutritious food. Along with lack of exercise, poor diet can be a contributing factor to obesity and related health problems among people who live in these neighbourhoods.

Community gardens provide both stress-reducing exercise and healthy, inexpensive or free produce. In 1999, 15 community gardens in New York City grew 11,000 pounds of fresh produce, of which they donated 50 percent to local soup kitchens and food pantries.

The same year a single garden in the South Bronx grew 200 pounds of tomatoes and 75 pounds of peppers. At many gardens throughout the city, gardeners give away their produce to neighbours and passersby.

Gardening builds strength, endurance, and flexibility. For example, raking or carrying leaves builds endurance and strength, while pruning cultivates flexibility. Studies show that gardeners eat vegetables more frequently than nongardeners. And gardening helps people relax, unwind, and connect with others. It also reduces blood pressure and relieves muscle tension. Moreover, gardening is a form of physical activity that people can do at any age.

The Health Benefits of Parks, 2006, p10
THE TRUST FOR PUBLIC LAND

Exposure to Nature and Greenery Makes People Healthier

A growing body of research shows that mere contact with the natural world improves physical and psychological health. One important study reviewed the recovery of surgical patients in a Pennsylvania hospital. The rooms of some patients offered views of a stand of trees, while others faced a brown brick wall. A review of ten years of medical records showed that patients with tree views had shorter hospitalizations, less need for pain killers, and fewer negative comments in the nurses' notes, compared with patients with brick-wall views.

The benefits extend to psychological health. "The concept that plants have a role in mental health is well established," according to a review of previous studies by Howard Frumkin in the American Journal of Preventive Medicine. "Horticultural therapy evolved as a form of mental health treatment, based on the therapeutic effects of gardening. It is also used today

in community-based programs, geriatrics programs, prisons, developmental disabilities programs, and special education.” Further, “research on recreational activities has shown that savanna-like settings are associated with self-reported feelings of ‘peacefulness,’ ‘tranquility,’ or ‘relaxation,’” Frumkin writes. “Viewing such settings leads to decreased fear and anger ... [and] is associated with enhanced mental alertness, attention, and cognitive performance, as measured by tasks such as proofreading and by formal psychological testing.

The Health Benefits of Parks, 2006, p15
THE TRUST FOR PUBLIC LAND

Why Exposure to Green Space May Benefit Health

Important theoretical foundations in the area of nature and health were laid by Harvard biologist Edward O. Wilson, who in 1984 hypothesized the existence of biophilia, “the innately emotional affiliation of human beings to other living organisms.” Howard Frumkin has extended this idea to postulate “an affinity for nature that goes beyond living things, to include streams, ocean waves, and wind.” This affinity may stem from evolutionary roots: “For the great majority of human existence, human biology has been embedded in the natural environment,” Frumkin writes. “Those who could smell the water, find the plants, follow the animals, and recognize the safe havens, must have enjoyed survival advantages.” These theories make the findings of the studies mentioned in this section easier to understand, especially when considered along with a related theory called habitat selection. This suggests that organisms gravitate toward environments in which they are likely to flourish, and many researchers have documented a human preference for natural elements. Conversely, animals stuck in unsuitable habitats suffer social and psychological breakdown. Researcher Frances Kuo suggests that humans prefer nature in their landscapes because it is a key ingredient of human habitat, is essential to our psychological and social health, and has an apparent beneficial effect on blood pressure, heart rate, mood, day-to-day effectiveness, social behaviour, cognitive functioning, and work performance.

Some experts advise that children today are not getting enough access to nature owing to fear of crime in distressed areas, parental paranoia about “stranger danger” in more affluent areas, media hype of infrequent child violence cases, and overexposure to technologies like computers and video games. Author Richard Louv calls this problem “nature-deficit disorder,” and says that children miss out on all kinds of growth opportunities when they are not allowed to explore the relative edges of civilization.

The Health Benefits of Parks, 2006, p16-17
THE TRUST FOR PUBLIC LAND

4.1.2.b. Community Gardens - Lessons to be Learned

Studies from the United States of America

Community Building - Getting the Community Involved

Research supports the widely held belief that community involvement in neighbourhood parks is correlated with an increase in “social capital.” That is, when people work together toward shared goals, such as working in a community garden or creating a park from a vacant lot, they get to know one another, trust one another, look out for one another, and feel invested in their neighbourhood. These benefits may be abstract, but they lead to concrete community improvements such as fewer homicides and other violent crime; fewer property crimes, including graffiti; reduced juvenile delinquency; higher educational achievement; lower rates of asthma and teen pregnancy; and better response to the community’s needs by central governments because they see a united front.

A similar idea to social capital is “collective efficacy”—when neighbours feel part of a community, trust one another, and are willing to intervene for the common good when trouble arises.

Activities such as working together to create parks foster in individuals the belief that they can effect other changes in their lives. A community park comes to symbolize not only the accomplishment of creating a haven where there was once a vacant lot, but perhaps more important, the general ability to create change. They have had a success, a small bit of power—for some, maybe, the first in their lives.

Neighbours continue to remain an important resource once a park is established. John Kretzmann, co-director of the Asset-Based Community Development Institute at Northwestern University, says that park managers should think of local residents as people with assets who can contribute their gifts and skills, turning parks into resource exchanges and learning networks.

The Health Benefits of Parks, 2006, p18
THE TRUST FOR PUBLIC LAND

Health Benefits of Community Gardens

Community gardens provide access to fresh, traditional produce and nutritionally rich foods in low-income neighbourhoods, where nutritious food is much less available than in other areas. “A study of all food stores in three low-income zip codes in Detroit found that only 19%, or fewer than one in five stores, carried a minimal ‘healthy food basket’ [of] products based on the food pyramid” (Pothukuchi 2003).

Studies (like the one conducted by Lackey and Associates) have shown that community gardeners and their children eat healthier, more nutrient rich diets than do non-gardening families (Bremer et al, 2003, p.54).

People who garden (or who live with someone who gardens) tend to eat more fruits and vegetables on a daily basis. In a survey in Flint, Michigan, while only 17.8% of respondents from non-gardening households ate fruits and vegetables at least 5 times a day, that number rose to 32.4% in households with a gardener. The same study showed that gardeners also tend to eat one more serving of fruits or vegetables per day than non-gardeners (Alaimo et al., 2008).

Increasing the consumption of organic local produce reduces exposure to chemical fertilizers and pesticides. Local food can also “be eaten fresh, without the preservatives that are typically added to produce that is shipped long distances” (Bremer et al, 2003,p. 54).

Multiple studies have shown that natural areas such as community gardens grant a variety of mental health benefits. Being in natural places fosters recovery from mental fatigue, improves outlook and life satisfaction, helps us to cope with and recover from stress, improves our ability to recover from illness and injury, restores concentration, and improves productivity (Maller et al., 2005).

Simply viewing plants has been shown to reduce fear, anger, blood pressure, and muscle tension (Relf, 1992 p. 161; Ulrich, 1979; Ulrich, 1986).

Carbon Footprint

Food in the United States travels an average of 1,300 miles from farm to fork, changes hands half a dozen times, and consumes 10 calories of fossil-fuel energy to produce a single calorie of modern supermarket food (Kloppenburger, Hendrickson and Stevenson, 1996, p. 33, 42; Pollan, 2008).

Producing food locally greatly reduces the greenhouse gas emissions related to transportation of food.

Fruits and vegetables sold in supermarkets spend as many as 7 to 14 days in transit. During this time, almost 50% of the transported food is lost to spoilage. Locally grown food reduces or eliminates this transit time, helping to greatly reduce waste (Community Food Security Coalition, 2003, p. 4).

Municipal Benefits - Community Gardens are an economic benefit to local governments:

Developing and maintaining garden space is less expensive than parkland area, in part because gardens require little land and 80% of their cost is in labor (Saylor, 2005).

Community gardens provide a place to retreat from the noise and commotion of urban environments, and have been shown to attract small businesses looking to relocate (Sherer, 2006).

Community garden programs provide employment, education, and entrepreneurship opportunities for a wide variety of people, including students, recent immigrants, and homeless people (Community Food Security Coalition, 2003)

While vacant lots can be magnets for litter and criminal activity, community gardens are observed and managed by the gardeners, resulting in a cleaner space and more active local community. All of this often comes at little or no cost to the city (Schmelzkopf, 1995).

Food Production

Community gardens allow families and individuals without land of their own the opportunity to produce food, and provide a place for gardeners to share knowledge and skills.

Exercise

Gardens can be areas for recreation and exercise. According to the American Journal of Preventive Medicine, the “creation of or enhanced access to places for physical activity combined with informational outreach” produced a 48.4% increase in frequency of physical activity in addition to a 5.1 percent median increase in aerobic capacity, reduced body fat, weight loss, improved flexibility and an increase in perceived energy (as referenced in Sherer, 2006).

Gardening is considered a moderate to heavy intensity physical activity, and has been linked to significant beneficial changes in total cholesterol, HDL cholesterol, and systolic blood pressure (Armstrong, 2000).

Besides being a great way to exercise, gardening motivates people to stay active longer than other activities. In one study, participants spent significantly more time gardening (225 minutes/week) than doing other leading forms of exercise, such as walking (160 minutes/week) and biking (170 minutes/week) (Caspersen et al., 1991).

Crime Prevention

Community gardens offer a focal point for community organizing, and can lead to community-based efforts to deal with other social concerns.

Community gardens give youth a safe place to interact with peers and can involve them in beneficial activities (Sherer, 2006).

Community gardens increase neighbourhood surveillance or “eyes on the street”, often deterring crime (Kuo & Sullivan, 2001b).

In a study of violent and property crimes around public housing buildings in Chicago, buildings with a high level of vegetation that doesn't obscure view (such as most garden

plants) had 52% fewer crimes than those with no landscaping. Buildings with medium levels of this type of vegetation had 42% fewer crimes (Kuo & Sullivan, 2001).

Scientific studies show that crime decreases in neighbourhoods as the amount of green space increases, and that vegetation has been seen to alleviate mental fatigue, one of the precursors to violent behaviour (Kuo and Sullivan, 2001).

Community gardening is recognized by many police departments as an effective community crime prevention strategy. In Philadelphia, burglaries and thefts in one precinct dropped by 90 percent after police helped residents clean up vacant lots and plant gardens. ("Healing America's cities" p. 5-6, as cited in Englander, 2001).

Youth Education

Community gardens can serve as an outdoor classroom where youth can learn valuable skills, like those involving practical math, communication, responsibility and cooperation. They also provide the opportunity to learn about the importance of community, stewardship and environmental responsibility.

When combined with science education, gardening can be a form of experiential learning that is more effective than traditional classroom learning. In a study of Hispanic and African American middle school students in Los Angeles, students who participated in a science class with a school garden project showed dramatically improved science-processing skills when compared to those in a traditional science class (Blair, 2009 p. 19).

In California, the San Francisco League of Urban Gardeners has a program in Alemany, a community with an unemployment rate of 84%, which employs 20-25 local youth during the school year and about 60 during the summer. They are trained in gardening, landscaping, habitat restoration, work skills and leadership development (Feenstra et al, 1999 p.40).

4.1.2.c. Manchester Strategy

Example of Biodiversity Strategy For Health - Manchester

To help nature recover in Manchester we will need more people to take greater action to protect it. This will also lead to the improved health and wellbeing of those involved. The growing focus on social prescribing provides an effective approach, linking individuals suffering from poor mental health to practical volunteering opportunities in the natural environment (eight out of 10 GPs are now issuing social prescriptions). Alongside benefits for health and wellbeing, nature is a critical component in creating thriving spaces where people want to live. Sites that have a high value for nature bring people together from different communities and this can address barriers and reduce loneliness.

Greener neighbourhoods have also been shown to give rise to stronger neighbourhood ties. Evidence shows that house prices are intrinsically linked to the aesthetic value and “greenness” of an area. It is critical that these vibrant natural spaces are equitable and available to residents living throughout the city – reinforcing the need for a recovery plan which improves the quality of ‘the spaces in between’ as well as flagship sites. Similarly, wildlife can be a catalyst for a sense of identity at a street, neighbourhood or even city level. The ‘Manchester Bee’ is the most compelling example of this, but consultation has evidenced that many residents living in Manchester want to act for nature as part of a bigger movement.

4.1.2.d. Testimonies from Health Professionals

Testimony from Local GP / 1

Dear Sir / Madam,

I am writing in support of Edgeley Wildlife Reserve Group and their application to oppose development of the area by Stockport County.

I am a Stockport based GP, Green lead for Heaton's PCN, Co Chair of Greater Manchester Greener Practice, Director of Seeding the Change C.I.C, and member of Stockport's Green Network.

As a GP I am dealing with more complex physical and mental health problems. Medication is often ineffective and increasingly, as GP's, we are promoting increased access to green space and time in nature to patients. Evidence shows that living in areas of green space is associated with less income related health inequality. It lowers cortisol levels slowing cognitive decline, improves mood and wellbeing whilst also reducing the risk of diabetes, hypertension and obesity. Natural England recommends for health benefits people should have a minimum of 2 hectares of green space within 5 minutes walk from home. It is estimated $\frac{1}{3}$ GM population aren't within 15 mins of greenspace. This is also the case for many of Edgeley's residents.

It therefore is not surprising that in 2021-22, 66% of >18's in Stockport's population were overweight or obese. Between 2016 and 2020 the number of people diagnosed with anxiety increased by 30%. Between 2016 and 2022, depression had increased by 63% . Between 2005 and 2022, individuals with serious mental health illness increased by 41%.

Stockport needs to increase accessibility of Green Space and protect already existing pockets, including Edgeley Wildlife Reserve. Not only for the community it serves but also as part of an approach to deal with the Climate Emergency and Biodiversity Crisis it faces.

I appeal to you, Stockport County, who have a well respected central role within Stockport, promoting exercise for health, to protect the wildlife reserve within Edgeley that means so much to so many, so that it can continue to flourish and provide an essential habitat for our rapidly declining native species whilst also serving as an essential health tool for those that are increasingly in need.

Many Thanks,

Dr Aimee Priestman

Testimony from Local GP / 2

Dear All,

My name is Dr Mugdha Wakodkar and I along with my husband Dr Vishwanath Siddagangaiah are putting this document forward to express our objection to the proposed plan of using Edgeley Wildlife Reserve space for car park development.

We reside at [REDACTED], Stockport [REDACTED] for the last 7 yrs and have relished the wildlife reserve area in our vicinity.

I have also come across other residents through meetings and talks and the majority feel this proposed plan will be quite disrupting to the wildlife.

There are also thoughts on using some of the wildlife areas for plantation (health professionals initiated) for better and healthy eating and maintaining healthy lifestyles. I am a GP myself and I strongly feel this will be very essential for the community struggling with major health issues and challenges.

We henceforth are coming forward to raise our objection through this email.

Thank you

Dr Mugdha Wakodkar

Testimony from Mental Health Support Worker

To whom it may concern,

My name is Tom Powell and I am a support worker currently working in secondary care mental health services in the Stockport locality. I have been supporting individuals with their recovery from severe and enduring mental health issues for over 14 years. I am writing in support of the Edgeley Wildlife Reserve Group and their campaign to preserve and enrich the area of land behind the South Stand, Edgeley Park.

This area is currently the largest area of land capable of supporting a suitable habitat for wildlife in the Edgeley ward and as such its value from an ecological perspective is tremendous. I am aware that surveys conducted by the Edgeley Wildlife Reserve Group have identified the presence of numerous flora and fauna in the area which will be in danger of being lost should the development continue as currently proposed.

From a mental health perspective, green social prescribing and nature-based interventions play a vital role in improving people's mental and physical wellbeing, fostering a sense of community and reducing loneliness and social isolation. I have seen first-hand the role that interventions such as nature walks, gardening and allotment projects, outdoor arts and cultural activities, foraging groups and conservation projects have in supporting people's recovery from mental illness and promoting mental and physical wellbeing more generally.

There is strong and growing evidence regarding the demonstrable positive impact that access to nature and natural green spaces has on peoples' mental and physical wellbeing. Government funded research by the National Academy for Social Prescribing found that contact and connection with nature was linked to a range of positive mental and physical health outcomes. The research found that nature-based social prescribing can have a positive impact on wellbeing and reduce social isolation. I am aware that this is a sector which is attracting increasing funding for community-led projects, such as the £2.6m Greater Manchester Green Spaces Fund. I believe that this area of land represents a unique opportunity to provide a space capable of hosting such community projects which would benefit the health and wellbeing of the local community.

I understand the desire from Stockport County to continue to develop the club and its infrastructure. I am also very aware of the excellent work that the club do in terms of supporting various groups in the local community including around supporting mental wellbeing. Therefore, I ask that Stockport County consider amending their current plans regarding the development of the South Stand in order to support the preservation of local wildlife and its habitat and in doing so continue the good work the club does in terms of promoting the health and wellbeing of the local community.

Yours Sincerely,

Tom Powell

4. 2. Nature and Education

It is time to make nature a NORMAL part of childhood again and restore wildlife so it can recover and thrive across urban jungles.

THE WILDLIFE TRUSTS

To sit in long grass and enjoy wildlife in a natural habitat, children in Edgeley need to catch a bus or train.

EWRG

The health benefits of urban green space are well recognised for children, whose physical and mental development is enhanced by living, playing and learning in green environments. The elderly also benefit significantly from visiting green and blue spaces, through improved physical health and social well-being.

European Environment Agency

In order for children to benefit from a richer natural environment close to home, as should be their right, first we have to protect such environments and enhance them. In areas where such environments are rare they need to be identified and designated.

Children in Edgeley are deprived of true natural green spaces. Creating such spaces is part of the government's 25 year plan pursuant of legally binding commitments.

EWR is the perfect size and location to create, develop and designate a gated nature reserve to serve local primary schools and community groups with educational and health benefiting activities and respite.

4.2.1 Commitments - National & Local Government

Encouraging children to be close to nature, in and out of school

We will launch a Nature Friendly Schools Programme to help more communities create the kind of school grounds that support learning about the natural world and also keep children happy and healthy.

The government will provide support for schools in our most disadvantaged areas that wish to create nature friendly grounds and to design and run activities that support pupil's health and wellbeing through contact with nature.

Supporting more pupil contact with local natural spaces

We want to make it easier for schools and Pupil Referral Units to take pupils on trips to natural spaces on a regular basis where they can combine learning with feeling healthier and happier. This might involve class visits to a city farm, a local nature reserve, woodland or National Park. In cases of individual need, a pupil might go to a care farm on a bespoke itinerary.

Actions we will take include:

- Developing a programme to support schools and Pupil Referral Units in our most disadvantaged areas in establishing progressive programmes of nature contact for their pupils, which can be opened to schools from autumn 2019.
- Supporting the expansion of school outreach activities delivered by community forests.
- Supporting a national expansion of care farming by 2022, trebling the number of places to 1.3m per year for children and adults in England.

RN, 25 yr plan, p75

4.2.2. Stockport Schools

4.2.2.a. Biodiversity and Local Access to Nature

Stockport Schools CAN Report 2022:

Stockport Metropolitan Borough Council have a Climate Action Now committee (CAN). CAN created the Stockport Schools Climate Assembly project, *Young Voices*, to hear children's views.

"It sets out that we as a council will take responsibility to act on what they tell us and deliver what is important to them".

In 2022, twenty-three schools from across Stockport attended the town hall to debate the development of climate action ideas to assess what actions schools and colleges could undertake and to tell the council what they wanted them to do.

In the appendix of *The Stockport Climate Action Now (CAN) Schools Climate Assembly Report For Full Council* (dated 14th July 2022) is a section titled: *Full List of Climate Action Ideas Submitted by Young People*.

In that section is a table titled: *Table 1: What Would You Like To See The Council Do To Tackle Climate Change?*

Under the subject of *Biodiversity and Green Spaces*, the answers presented by the seven schools chosen were:

- Bee Zones,
- Protect Green Spaces,
- Make public allotments which have been rewilded,
- Beehives in schools,
- Protect Green Spaces and plant more trees,
- Don't allow building on green spaces
- Rewild areas of council owned parks to provide opportunity for natural habitats.

With this in mind and with consideration to Greater Manchester and Stockports' focus on Green Spaces, as well as legally binding commitments aimed at protecting, restoring and enhancing existing natural habitat; how can the council justify destroying **63,000** square feet of natural habitat (including trees young or mature, undergrowth and grasses) to build a car park (as per the plans of Stockport County Football Club) and justify such plans under the auspiciousness of *improving* the environmental value of Edgeley?

Stockport Schools CAN Report 2023:

In 2023, over 850 young people took part in a climate action lesson at the start of the *Young Voices* project and 130 climate action ideas (all thought up by young people) were submitted to the council as part of the project.

The Town Hall debates took place in March where 78 young people representing 28 schools and colleges took part. The young people voted on which climate action idea they thought was most important, supporting an action around **community gardens** where people can plant and pick fruit and vegetables, reducing the carbon footprint of food. This idea was originally submitted by St Paul's Primary School in Brinnington. **The council has committed to act on this.**

EWR absolutely already does meet the aims of these *Biodiversity and Green Spaces* ideas from children. It has the scope and potential to include provision for a school community food garden.

There are five primary schools within half a mile walking distance of EWR, eight are within a 15 minute walking distance. EWR will be accessible to some of the most deprived children in Stockport. Most of them have very limited school grounds, (some don't even have a blade of grass) limited access to wild space and certainly no access to a fenced, dog free, clean, safe space designated to wildlife and nature.

EWRG have spoken to these schools and five of them said they would value and use this space as a gated resource for school children. The potential of the space EWR offers for our children is paramount.

Many individuals in Edgeley, including children, 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. Access to such areas should be one of the priorities considered in town planning.

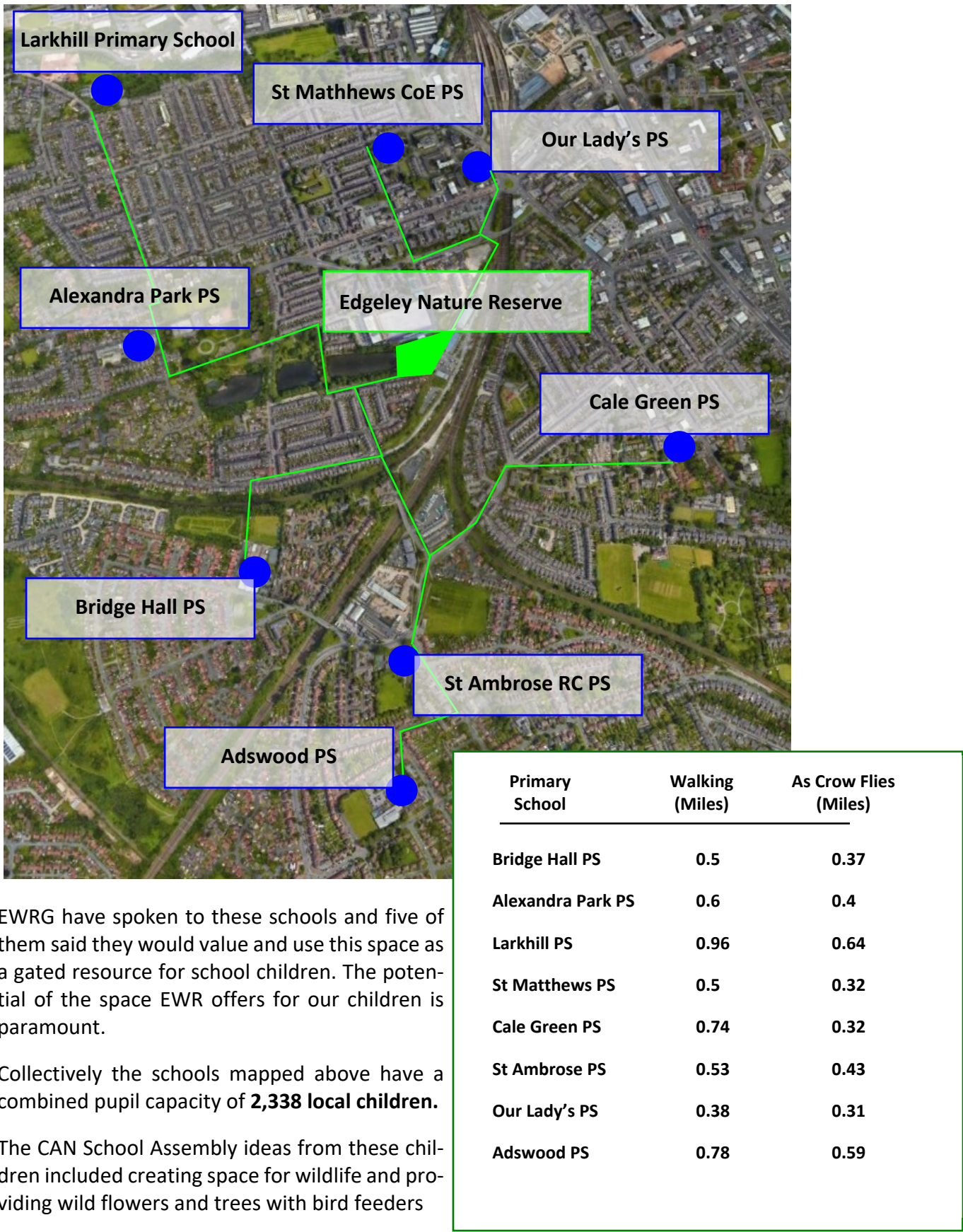
The long-term aim of EWR as an urban nature reserve would be to include children in an educational programme of development and care. Without the basis of locally accessible natural habitat there will exist an absence of opportunity in delivering related educational activity based benefits.

Securing this wild space now would be of huge benefit to our children. Access to and protection and restoration of wild space for children in the Edgeley and surrounding communities is a must for consideration in regard to the outline part of this planning application (Ref: # DC/092211) and in regard to the wider legally binding commitments aimed at protecting and improving biodiversity.

Collectively the schools mapped on the following page have a combined pupil capacity of **2,338 local children**.

The CAN School Assembly ideas from these children included creating space for wildlife and providing wild flowers and trees with bird feeders

4.2.2.b. School Distribution in Relation to EWR



4.3. Match-Going Fan Base Analysis

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

4.3.1. 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.

4.3.2. Stockport County Attendance History:

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

Tier 3	Av. Home Attendance
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 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.

4.4. Summary of Part 4: Community, Health & Education

It is clearly obvious, to most, that contact with the natural world is beneficial to humans in many ways. It is also well established by health professions and major health organisations such as the NHS, that access to nature is key to treating many health problems in many ways and should be an integral part of growing up. Scientists and researchers across the globe have found that nature parks in urban areas have priceless value and offer benefits to local communities which potentially last forever.

Unlike many generations before and many other areas of the country, in Edgeley children are deprived of the opportunity to experience nature on the doorstep. Therefore, they are missing out upon the joys and educational benefits which previous British generations may have taken for granted. We are increasingly seeing a situation whereby experiencing nature and having access to it close to home is for privileged neighbourhoods only. British children, specifically in deprived neighbourhoods and urban district centres, are being denied what should be a basic human right to witness the natural world their ancestors shared life with.

Stockport County FC have a huge footprint in Edgeley. First and foremost, Stockport County FC are a football club. Football leads their ambitions and their development. The district which is Edgeley, and the Edgeley community, should not be synonymous with, or rely upon, only a football club. Since 1889, SCFC have had an average match going following of 6,267. The population of Stockport is 297,107 and the population of Edgeley is 14,182. Other ideas, other people, need space to see Edgeley developed how *they* would like.

Allowing the last vestige of natural habitat of any meaningful size in Edgeley be uprooted for a car park would take away the opportunities for generations of local people; children, elderly and others; to local access to something which is so important in many ways. In respect of Edgeley, allowing the outline part of the planning application DC/092211 would be saying experiencing nature in a natural setting is a privilege only some communities should expect. Health, wellbeing and education is important across a wide spectrum of ages and situations and access to health and education services are an important thing for the future of society and communities. Mental Health and wellbeing, in particular, is an increasing concern, particularly for our young people.

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

In objection to the outline part of the planning application (Ref: # DC/092211) to build a car park; Part 3: (*Ecology & Biodiversity*) of this document argues for the protection, designation and enhancement of EWR as a nature reserve. It focuses upon legally binding commitments to halt the decline of nature in the UK. Many of those arguments (explained in more depth in Part 3) also consider lack of access to nature from a human perspective. The Edgeley community is deprived of true natural space and Part 3 lists various legally binding commitments in regard to protecting, restoring and enhancing biodiversity for local communities as well as arguments for the designation of a nature reserve.

This part (Part 4) adds to the argument against a car park in favour of a designated nature reserve on the basis of community health, wellbeing, education and social cohesion.

Commitments

It is important to understand that the public expect authorities which make declarations, sign agreements and publish commitments to take their promises seriously. 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 the outline part of the planning application DC/092211, Stockport Metropolitan Borough 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. EWR may be a small stone on a global mountain but it is a monumental gate pillar in local terms, both for the creatures which rely upon it, the catchment area of eight primary schools, the Edgeley community, and for other reasons covered by this document as a whole.

Ratified by 196 countries, the Convention of Biological Diversity 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. Four overarching goals of CBD set out a vision for biodiversity by 2050. Two of them are: **Substantially increase the area of natural ecosystems by maintaining, enhancing or restoring the integrity, connectivity and resilience of all ecosystems.** Reduce by tenfold the extinction rate and risk of all species and increase the abundance of native wild species. Maintain the genetic diversity of wild and domesticated species and safeguard their adaptive potential, and; **Ensure nature's contributions to people are valued, maintained and enhanced, with those contributions currently in decline being restored.**

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)*.

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. In 2022 the UK agreed that goals with the year 2050 in mind should prioritize:

- **Protecting and restoring nature** and **substantially increasing the area of natural ecosystems**
- Prospering **with nature** using biodiversity sustainably
- Sharing all the benefits of the genetic resources of nature fairly, including with indigenous people **and local communities**

Protecting and restoring nature, or increasing the area of natural ecosystems cannot be achieved by robbing Peter to pay Paul. Urban development is the chief driving force behind loss of habitat and ecosystems. Mitigation and compensatory tactics should be a last resort. Where options remain and alternatives exist, mitigation and compensation should not be viewed as positive tools in making planning decisions. If we are to regain control and change negative trends we must recognize that habitat needs protecting in order for nature to be restored. At EWR, nature exists. It exists in a situation and at a location which can contribute toward further restoration which will benefit people and the local community in terms of health and education, as well as the natural world.

By understanding, realising and recognizing the value of EWR and its potential, the 'area of national natural ecosystems' can be 'Increased'. With it gone, an opportunity is lost in working toward achieving legally binding commitments. Other human orientated opportunities which would come of protecting and restoring EWR would also be lost. Biodiversity sustainability is not just about the use of new methods, technologies and environmentally friendly regard in planning design or construction. Biodiversity sustainability starts with recognising biodiversity potential in the first instance. There are also many ways humans and communities can benefit and prosper from biodiversity sustainability and sustaining biodiversity.

In the immediate locality of the planned development (*i.e.* Edgeley) there is a distinct lack of wildlife habitat of any reasonable size or condition. EWR is the largest parcel of land in Edgeley and evidently EWR is the only parcel of land in Edgeley, that can be truly considered as offering the potential to enhance wildlife habitat on any meaningful scale. Edgeley is a deprived area. It is not only deprived economically but access to meaningfully sized spaces managed for nature at this current time, is zero. Edgeley is a local community. National government has committed to sharing all the benefits of the genetic resources of nature fairly, including with indigenous people **and local communities**.

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. UK government has therefore agreed to a set of interim targets, these include a set of targets aiming **to meet people's needs**.

Target 1: This target focuses on the management and sustainability of wild species to benefit people. Wild native species such as hazelnuts, apple, pear, cherry, raspberry, blackberry and many overlooked wild native herbs, berries, leaves and fungi have clear benefits for people in terms of consumption and health. Likewise, the activity of interacting with such wild species in a natural environment has benefits for people in terms of wellbeing, education and cultural satisfaction. According to the idea of creating a gated nature reserve; EWR has the potential, with correct management and enhancement, to provide historically cultural biodiverse friendly and sustainable products and activities which can also lead to improvements in health and well-being in the community. The positive differences of activities pursued in a natural habitat setting are discussed in Part 4: *Community, Health & Education*.

It is clear, particularly in urban environments, that people have lost touch with the cultural practices and learning that natural habitat can provide. There is a wealth of evidence to suggest that the negative impact of not having access to such activities locally within urban areas is detriment to health and wellbeing. EWR offers a potential opportunity to re-introduce such activities to generations of children and adults. With the added inclusion of community growing beds such as those provided by Seeding The Change, EWR holds potential value in **meeting people's needs through sustainable use and benefit sharing**. People and communities have cultural needs as well as economic needs. For example; picking wild fruit for pies and jam was once a widespread activity until relatively recently.

With Edgeley lacking in similar areas, the size of EWR as it is now, offers opportunities for people local or near to Edgeley to practice such cultural needs and/or re-educate their children of what beneficial wild species exist. In regard to wild species; EWR also has the potential to serve as an educational base for the local community. Understanding this should be an incentive for the conservation and sustainable use of EWR after enhancement in order to thereafter provide an area which meets **people's needs through sustainable use and benefit sharing**.

TARGET 10: It is not known at the time of writing this document whether The Fisheries Act 2020 is directly relevant to inland freshwater fisheries such as those managed by Edgeley Park Angling Club, however, in terms of the planning application and in respect to guidance, is included here because, the act describes an ecosystem approach which **ensures that the collective pressure of human activities is kept within levels compatible with the achievement of good environmental status**.

Due to the adjacency of Reservoir #1 (Sykes Reservoir) to the planned car park construction, there may exist risk of immediate and long term damage from added pressures upon the ecosystem of the Sykes Reservoir itself. The variety and variability of animals, plants and micro-organisms used in these systems is an important aspect of biodiversity. The fishery may be subject to pollutants during construction directly or thereafter, in the form of dust, chemicals, spillage and litter. Litter may be of special concern with very heavy footfall incurred by the presence of a car park. A fresh water ecosystem links EWR (the underground spring water rivulet), the reservoir's waters, and westward - the wider water-to-river system, ultimately leading to the sea. Eco-system based approaches and decisions should therefore be considered in respect to the planned application, the reservoirs, and the open stream which runs from EWR and alongside the reservoirs, it being integral to their function and the function of the eco-system there. Consideration of the risks are important locally because, in regard to the reservoirs, activities associated with these production systems are important elements of human well-being and economic activity.

TARGET 11: This interim target, agreed to and committed to by UK government, is concerned with the restoration, maintenance and enhancement of nature's contributions to people. The aim is to improve the quality of life and well-being of people and benefit nature by restoring, maintaining and enhancing ecosystems.

As a result of the ongoing decline of biodiversity, **nature's contributions to people are also in decline**, with **serious implications for human well-being and social cohesion**.

Edgeley is a deprived area when it comes to access to nature. Locally, EWR stands as a single well-situated viable option in giving the people of Edgeley (as well as other nearby areas of Stockport) access to ecosystem services which will contribute toward human well-being and social cohesion as well as stemming the decline of natural habitat and species abundance across the geographical spectrum.

Conversely, even with the application's 'retained area', and notwithstanding other negative issues, the construction of a car park upon EWR would remove and disturb too many variables and take away too much of the area for it to continue as a safe, secure location for nature to flourish to a degree that is meaningful locally and/or in adherence to legally binding commitments made by government.

Ecologists have established that EWR consists of woodland, scrub and grassland. These are three defined sub-systems, each of which are important for introducing and re-introducing people to nature. The sum of these sub-systems offer a range of beneficial contributions for and from nature. With enhancement, integral sub-systems such as these and EWR as a whole, provide the potential to offer the local community; educational, health, and respite services, as well as a rich variety of other general biodiversity services.

A nature-based solution/ecosystem-based approach (as advised by CBD and committed to by UK government) would aim to protect, conserve, restore, sustainably use and manage EWR in its entirety.

TARGET 12: 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.

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 13: This interim target, agreed to and committed to by UK government, is concerned with correlating information, sharing strategies, findings, existing knowledge and data related to efforts to protect restore and enhance biodiversity for the sake of nature and humankind. Local government strategies and plans should involve the identification, mapping and designation of EWR and similar areas across Stockport. Local government should develop robust, well connected, data, technology and information networks as part of nature recovery strategies so that local, regional, national and global communities can access knowledge, practices, ideas and be inspired by success and learn from failures in regard to these targets.

When it comes to planning applications and timelines, EWRG would suggest that the process be more transparent and enabled so that hundreds of pages of application papers can be analysed and responded to in a longer timeframe than is currently allotted. EWRG also suggests that the capacity to upload documents to the 'comments' pages (as opposed to a limit of 2,000 words) relating to submitted planning applications is an essential democratic process. East Cheshire Council's model is an example to consider.

TARGET 14: This interim target aims to ensure that the government's commitments to biodiversity and its values are fully intergrated 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.

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 this section of this document. 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.

The Environment Act 2021

In England, the Environment Act 2021 includes **legally binding targets** for the government that will help the UK to meet its international commitments. The UK is taking the decline of biodiversity and the

resulting impact on society (communities, health, wellbeing and education) seriously. Only by starting at local levels can anything change. Already an existing refuge for nature locally, with enhancement, EWR as it is now, offers real potential in contributing toward stemming species abundance decline nationally as well as offering a potential wealth of ecoservice benefits to people in Stockport.

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

The 25 yr Plan

According to 'The Environment Act 2021', 'Recovering Nature: 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.

The twenty-five year plan (to be treated as an environmental improvement plan prepared by the Secretary of State under Section 1. Pursuant of The Environment Act) to recover nature in the UK recognizes how time spent in the natural world is integral to human health and daily life. By providing and/or restoring, preserving and/or protecting wildlife habitats in ecologically deprived urban areas such as Edgeley, nature can contribute toward a healthier community as well as a healthier eco system. Walking beside a hazel lined hedgerow dividing a car park from industrial facilities or placing pit grown trees surrounded by cars, is NOT pursuant to 'additional wildlife habitat' because it is not true 'wildlife habitat' and it is NOT 'additional', nor can it contribute to 'time spent in nature'! Conversely, it follows therefore, that with EWR gone or depreciated there will be no local 'natural world' of any reasonable size or potential to spend time in to 'feel better'.

All of these policies relate to EWR in one way or another. EWR is land that can be used and managed sustainably by the local community. Designating EWR as an urban nature reserve will contribute to the recovery of nature and enhance the local area. The idea for a gated nature reserve upon EWR will connect people with the environment to improve health and wellbeing through activities, education and local food production. A decision to deny permission for a car park upon EWR will increase and encourage resource efficiency (in terms of more eco-efficient modes of travel and use of existing and potential biodiversity services) and will contribute toward reducing pollution in terms of air quality by encouraging other forms of more eco-friendly travel and in terms of integral water systems by minimizing the risk of negative effects upon the spring water rivulet and the reservoirs and wider river system, from chemicals, spillages, dust, pollutants used during construction and litter from heavy footfall during use after construction. Protecting, restoring and enhancing EWR as a whole will contribute toward improving the global environment and still allow ecologically concerned peoples and businesses to

enhance other areas of the locality freely in what would constitute true **additions** to positive biodiversity measures.

Many people in Edgeley have other interests than football. Many people in urban areas would also like to enjoy the sights and sounds of British wildlife. Many people in urban areas would like, need, and would benefit from, the local opportunity to experience an oasis of natural habitat for many reasons. Some may like to see or sow wild flowers away from the bricks and mortar and concrete which surrounds them. Some would like to experience hearing the wind rustle among long grasses in a natural setting. Britain's wildlife and habitat cannot begin to recover from its shocking decline in abundance and 'thrive' where there is nowhere left for it to 'thrive'.

Engagement with the beauty of natural environments is beneficial to health and wellbeing. Natural environments are also a great source of education. Activities connected with the enhancement, management and involvement of and within natural environments can lead to more cohesive communities. Enhanced beauty and engagement with the natural environment cannot be established in Edgeley with the creation of a car park. Beauty is subjective. Enhanced beauty can be established anywhere in Edgeley including EWR but, as it stands, in Edgeley, engagement with anything resembling a natural environment of any reasonable scope can **only** be established in EWR.

Removing true existing wildlife habitats to replace them with car parks cannot achieve the same additional benefits which are lacking. It is contradictory to creating '**additional** wildlife habitat'. Mitigation and compensation delivered piecemeal cannot re-create adequately sized wildlife habitat or benefit local communities in the same ways. Putting the environment first and providing richer habitats are key policy actions and commitments government is legally bound to. Respecting nature's intrinsic value is a critical aspect of the government's mission in establishing the recovery of nature in the UK and improving our environment so that people can enjoy it. Restoring and creating woodland and grassland is not synonymous with mitigation and compensation. The greatest opportunity for wildlife to flourish cannot be achieved by destroying existing woodland, grassland and scrub in favour of car parks and fragmented and piecemeal mitigation strategies.

Pursuant with legally binding commitments established in The Environment Act 2021 and the targets referred to in this document in Part 3: (*Ecology & Biodiversity*) government is committed to taking action toward establishing the following policies:

- Helping people improve their health and wellbeing by using green spaces including through mental health services.
- Encouraging children to be **close to nature, in and out of school, with particular focus on disadvantaged areas**.
- 'Green' our towns and cities by **creating green infrastructure** and planting one million urban trees.

RN: 25yr PLAN , p71

Government also remains bound to commitments to “*help children and young people from all backgrounds to engage with nature and improve the environment.*” Promoting the wider economic and social benefits that healthy habitats can offer can only be achieved if the habitats exist in the first place, are created, or are restored. EWR exists. There is nowhere else and no opportunity anywhere else in Edgeley to enhance, restore, or create wildlife habitat of any meaningful size or degree. EWR is situated in an ideal place for designation and already possesses natural elements. It is beside a gated reservoir; it is the site of a natural spring water rivulet; it contains woodland, grassland and scrub; it is connected to as-of-yet undesignated green corridors; it is in the local area and within walking distance of 8 primary schools, many of which have little, and some no, green space on site; and it is close to a natural habitat deprived urban centre with high levels of mental and physical health diagnosis.

Biodiversity 2020

Biodiversity 2020: A strategy for England’s wildlife and ecosystem services was published by the UK Department for Environment, Food and Rural Affairs (Defra). It sets out a vision and a mission, along with desired outcomes hoped to be achieved by 2030.

The aims, ambitions and priorities of the strategies implemented are widescale and landscape based. However, landscape scale projects require building blocks established at local level. The criteria and aspects included in this strategy can also be applied to local projects or can be used to establish a basis for participation in larger projects such as NIAs or equivalent in the future. Priorities at landscape level reflect those of the building blocks of such schemes at local level. Removing those building blocks and their potential will permanently negatively effect the long term strategy for the recovery of England’s wildlife and ecosystem services.

The National Ecosystem Assessment (NEA) established that the natural world and its ecosystems are critically important to our **wellbeing and economic prosperity** but are consistently undervalued in conventional analyses and decision-making. Actions taken and decisions made now will have consequences far into the future for ecosystems, **ecosystem services** and **human wellbeing**. It is important that these consequences are understood, so that we can make the best possible choices for present and future generations.

Making Space For Nature

Biodiversity in Britain continues to decline. Reviews of England’s wildlife sites and ecological network, *Making Space for Nature* chaired by Professor Sir John Lawton and *The Latest State of Nature Report 2023*, reveal that England’s collection of wildlife areas (both legally protected areas **and others**) are now failing to be coherent and resilient ecological networks. *Making Space for Nature* concludes that establishing a functional ecological network would effectively conserve biodiversity and **ecosystem services**, delivering **many benefits to people**, while also making efficient use of scarce land and resources. It recommended that priorities in England should include **better, more, bigger** and joined sites for nature. Ecological networks are considered to be an effective means to conserve ecosystems and wildlife in environments, such as England, that have become fragmented by human activities. We need to extend this approach much more widely.

People:

People value the natural world in many different ways and for different reasons. These include valuing it for its own sake (sometimes called its 'intrinsic' or 'existence' value), because it makes our streets and gardens more attractive, or because **people enjoy experiencing nature-rich green places** for recreation, whether a walk in a park or in relatively wild places such as National Parks. Others enjoy bird watching, or activities such as angling or wildfowling. Evidence supports what many people feel instinctively – that regular **opportunities to experience natural environments have quantifiable positive impacts** on our **mental and physical health**. A host of other ecosystem services are also becoming better understood. All can motivate people to take or support positive action for biodiversity. We need to better take account of the values of biodiversity in decision-making. There is potential to expand and establish new markets and financing approaches for nature's services.

Priorities:

Priority action: Establish more coherent and resilient ecological networks on land that safeguard ecosystem services **for the benefit of wildlife and people**.

Priority action: Take targeted action for the recovery of priority species, whose conservation is not delivered through wider habitat-based and ecosystem measures

Priority action: Work with the biodiversity partnership to **engage significantly more people in biodiversity issues**, increase awareness of the value of biodiversity and increase the number of people taking positive action

Priority action: Promote taking better account of the values of biodiversity in public and private sector decision-making, including by providing tools to help consider a wider range of ecosystem services

Priority action: Through reforms of the planning system, take a strategic approach to planning for nature **within and across local areas**. This approach will guide development to the best locations, encourage greener design and enable development to enhance natural networks. We will retain the protection and improvement of the natural environment as core objectives of the planning system

How EWR can meet aims, ambitions and priorities of Biodiversity 2020:

Stockport, through EWR, has the opportunity to inspire people through an enhanced experience of the natural environment. EWR as it is today offers opportunities to establish and improve ecological networks by protecting and enhancing and connecting an existing wildlife site in terms of the wider strategy to benefit nature, people and the local community. It holds the potential to meet shared visions for the natural environment among a wide partnership of local people, including statutory and voluntary sectors. A designated nature reserve upon EWR can benefit the people of Edgeley and surrounding areas and communities, whilst at the same time contributing to ecological networks extending elsewhere into and ultimately out of urban areas. EWR is also a win-win opportunity offering multiple benefits, such as for: the water environment and Water Framework Directive objectives and the low-carbon economy.

As well as perfectly meeting legally binding targets and commitments set by the CBD, on a local level, EWR can meet the aim of the Biodiversity 2020 strategy by protecting, restoring and enhancing habitat in ways that can contribute to the strategic plans and ambitions the government have implemented. 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 greenspaces for purposes of health and wellbeing.

Local Commitments

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. **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. This document presents alternatives and suggestions for consideration in regard to the outline part of the planning application DC/092211 in Part 7: *Alternatives*.

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 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**, covered more thoroughly in Part 3 of this document: *Ecology & Biodiversity*, Greater Manchester's Local Wildlife Recovery Strategy is aimed at establishing ways of stemming habitat loss, protecting existing areas and improving biodiversity in what amounts to a dual effort to improve the health of our natural heritage and our communities. 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.

The designation of any natural wildlife habitat areas that can be protected and enhanced should be paramount in local town planning. Likewise, it should be expected that local authorities within Greater Manchester, such as Stockport, being in a position of access to modes of inter and intra department communication, would notify GMCA of any such sites/areas existing within local boundaries. According to Greater Manchester Combined Authority, in order to remain in line with existing statutory regulation and guidance published by Defra, strategies should: **Map proposed 'opportunity areas' for creating or improving GM for habitats and species**; Set out how the strategy will be monitored; Undertake a public consultation.

An email was sent to a conservation officer at Stockport Council's planning department before these commitments were drawn up, shortly before Stockport County Football Club leased EWR, and before

plans to extend Edgeley Park stadium were publicly known, proposing that the land that comprises EWR be considered as a Nature Reserve. The authors and supporters of this document (Edgeley Wildlife Reserve Group) request that *"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, pursuant of Defra's advice (previous page) in order to remain in line with existing statutory regulation and guidance.

As part of GMCA, Stockport Metropolitan Borough Council are required to fulfil legally binding commitments and statutory regulation.

As already considered in Part 3 of this document: *Ecology & Biodiversity*; 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.

Stockport:

Public authorities who operate in England **must consider what they can do to conserve and enhance biodiversity** in England. This is the strengthened 'biodiversity duty' that the Environment Act 2021 introduces. As a public authority, SMBC are duty bound to consider what they can do to **conserve and enhance** biodiversity. Conserving and enhancing biodiversity is **not** the same as mitigating or compensating for its loss.

SMBC should be implementing policies and objectives and acting to deliver strategies to achieve goals which meet national and global legally binding commitments.

SMBC is obliged to initiate strategies concerned with **local nature recovery**, species conservation and protected sites in order to meet its duty according to the Environment Act 2021.

SMBC must agree what its priorities are concerning the recovery of nature in Stockport and map the existing most valuable areas .

SMBC should be mapping/identifying specific areas for the **creation and enhancement of habitat for nature** and wider reaching environmental goals. The creation and enhancement of natural habitat is **not** the same as mitigating or compensating for its loss.

The government has advised local authorities to consider being involved in contributing by acting on proposals to **create or improve habitat on land they own** or manage., or helping someone else to do so.

SMBC is expected to commit to species conservation strategies aimed at safeguarding the future of the species that are at greatest risk. SMBC is expected to commit to protected site strategies by taking a new approach in **protecting** and **restoring** species and **habitats** in protected sites. **Protecting** and **restoring** species and **habitats** is **not** the same as mitigating or compensating for their loss. **Restoring habitats** is **not** the same as restoring species. Restoration of species will often require restoration of habitats. Thus, the need for more and better protected or otherwise, designated, sites.

The successful implementation of local government strategies pursuant to national government guidelines and legislature will contribute to legally bound commitments aimed at achieving goals and targets relating to the biodiversity crisis. Stockport are duty bound to help achieve a decline in species abundance, to increasing abundance to non-critical levels and to restoring or creating a range of rich wildlife habitats.

A Natural Capital approach is suggested in devising biodiversity strategies. This involves a greater consideration of the services which the ecosystem provides in benefiting people **and communities**

including **in wellbeing, education, health and social cohesion** as well as **local production and the wider economic** knock-on effects.

When engaged in development plans and decisions, SMBC is advised to **consider its biodiversity duty** when complying with requirements related to strategic environmental assessments, environmental impact assessments and habitats regulations assessments.

SMBC is expected to consider how it manages land to improve biodiversity. Improving biodiversity is **not** the same as mitigating or compensating for its loss.

In order to meet commitments to improve biodiversity, the state of nature, and the environment, locally and nationally; national government advises that local governments such as SMBC **create habitats for wildlife and 'nature corridors'** that connect existing habitats. The creation of natural habitat is **not** the same as mitigation or compensation for its loss.

In order to meet commitments to improve biodiversity, the state of nature, and the environment, locally and nationally; national government advises that local governments such as SMBC **create dedicated spaces for wildlife**. The creation of dedicated spaces for wildlife is **not** the same as mitigation or compensation for its loss.

National advise, pursuant to local authority commitments, advises using legislation to protect sites such as local nature reserves. Protecting, restoring, enhancing and dedicating EWR as a local nature reserve would meet all of the guidelines suggested. Compensating or mitigating for the loss of half of it would meet **none**.

National Planning Policy Framework (NPPF)

Part 3: *Ecology & Biodiversity* of this document covered legally binding commitments which national and local authority are duty bound to honour. Many of them are directly related to **health, wellbeing and community cohesion**. This section revisits some of the legally binding commitments which are focused upon local communities and health. For more in-depth detail about local authority obligations regarding legally binding commitments to improving biodiversity (for nature and people) see Part 3: *Ecology & Biodiversity*.

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

Alternative ecosystem development needs and access to ecosystem services for the Edgeley community and surrounding areas are discussed throughout this document. A healthy biodiverse environment, access to natural space, connection with nature, the opportunity to exercise self-sustainability, the option to participate to society and biodiversity in sustainable ways and with activities connected to nature and the natural world are all important aspects of a healthy society. In terms of Edgeley, a

community deprived in many ways; the need for development of meaningful (in size and scope) of natural sites and the resulting ecoservices is blindingly obvious. National policy, as pursuant with The Environment Act, stipulates considerations relating to the declared biodiversity crisis and meeting legally binding commitments described in this part (Part 4) in part and in full in Part 3: *Ecology & Biodiversity / Commitments - National*.

The idea for the designation and thereafter enhancement of a nature reserve at EWR is provided in Part 3 of this document: (*Ecology & Biodiversity*) and some alternatives to the outline part of the planning application (Ref: # DC/092211) are presented in Part 7: *Alternatives*.

Achieving sustainable development

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. Edgeley is already deprived of such space.

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. Benefits to health and wellbeing of such spaces have been recognised across a spectrum of health and governmental bodies. In the long term benefits can also be measured economically. For example, in preventative terms, such spaces contribute to health and wellbeing which minimizes the impact upon economy and spending within the NHS infrastructure.

Sustainable solutions would include protecting and enhancing natural environment according to legally binding commitments 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. 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*)

In terms of conservation, provision for EWR, for the benefit of people and the community as well as for ecological reasons, should be essential in regard to strategic policies relating to spatial planning for Edgeley. (See Part 3: *Ecology & Biodiversity*)

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. The designation of EWR as a nature reserve meets legally binding commitments at improving biodiversity for the sake of nature and local communities.

Plan making - Preparing and reviewing plans

Notwithstanding duty to legally binding commitments toward the Biodiversity Crisis, 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*) (See Part 7: *Alternatives*)

Plan making - Examining plans

Local plans and spatial development strategies should have assessed that the local area (Edgeley) and its community 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 of 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 figure of 150-200 out of 19,750 people. (See 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 implications of developing the area have not been examined (See Part 5: *Water, Drainage & Flooding*). The existing quality and potential scope of the area of EWR in regard to ecological surveying was lacking (see Part 3: *Ecology & Biodiversity*). Neither was the lone representation of EWR as viable habitat in the context of the local area and its community considered in context of legally binding commitments to recover nature and improve biodiversity at local and community levels.

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) or alternatives which emerging Local Plans, Local Nature Recovery Strategies and Biodiversity Action Plans are obliged to consider to meet legally binding commitments (see Part 7: *Alternatives*).

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.

Promoting healthy and safe communities

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

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.

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 and the as-of-yet undesignated green corridor provided by the railway embankment reaching southward.

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. Local plans and spatial development strategies should identify that reasonable alternatives to the car park in question would involve convincing, encouragement of, or incentives for; use of public transport for an average figure of 150-200 out of 19,750 people. The figure is based upon the number of car users that would utilize the car park which would be built upon EWR during any given event.

The development area exists within easy reach of existing public transport routes and is very close to Stockport's designated Transport Hub. 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 modes of transport (See Part 7: *Alternatives*).

Making Effective use of land

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.

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 for the sake of nature and local community.

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 is for a gated nature reserve offering ecoservices to local community (including food production growing beds); social participation activities; flood risk prevention and mitigation; 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.

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.

Achieving appropriate densities

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).

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

For ecological reasons, especially in view of health and wellbeing benefits of local communities, 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 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 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.

In terms of EWR, the area subject to the outline part of the planning application (Ref: # DC/092211) is the most valuable in Edgeley and to the Edgeley community, in terms of environmental value and in

terms of potential for establishing a basis for ecoservices related to health and wellbeing and education.

Habitats and Biodiversity

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. The loss of EWR or any part of it would greatly impact the scope of potential human benefits which can be provided by ecosystem services.

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

Ground Conditions and Pollution

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.

Nature and Health

We know that many people living and working in dense urban environments have limited connection with nature or perceive it to be something which is only found in the countryside. Whether we are connected with nature or not, it is beneficial to us all. Some benefits are fundamentally obvious – the air we breathe, the water we drink and the food we eat are all ultimately reliant upon a healthy natural environment. Increasingly, health professionals and researchers are recognising the benefits of true natural spaces in contributing to healthy people and healthy societies. **Nature is an important need for many and vital in keeping us emotionally, psychologically and physically healthy.**

The idea behind creating a nature reserve at EWR incorporates use of a section for raised growing beds for local community groups and primary schools to utilize. This means that EWR as a gated nature reserve would be able to provide all the benefits listed in this document's content. Access to self-grown food is access to sustainable living and in correctly managed circumstances can benefit the local high street with locally grown produce as well as a range of other benefits.

Testimony from Local GP / 1

Dear Sir / Madam,

I am writing in support of Edgeley Wildlife Reserve Group and their application to oppose development of the area by Stockport County.

I am a Stockport based GP, Green lead for Heaton's PCN, Co Chair of Greater Manchester Greener Practice, Director of Seeding the Change C.I.C, and member of Stockport's Green Network.

As a GP I am dealing with more complex physical and mental health problems. Medication is often ineffective and increasingly, as GP's, we are promoting increased access to green space and time in nature to patients. Evidence shows that living in areas of green space is associated with less income related health inequality. It lowers cortisol levels slowing cognitive decline, improves mood and wellbeing whilst also reducing the risk of diabetes, hypertension and obesity. Natural England recommends for health benefits people should have a minimum of 2 hectares of green space within 5 minutes walk from home. It is estimated $\frac{1}{3}$ GM population aren't within 15 mins of greenspace. This is also the case for many of Edgeley's residents.

It therefore is not surprising that in 2021-22, 66% of >18's in Stockport's population were overweight or obese. Between 2016 and 2020 the number of people diagnosed with anxiety increased by 30%. Between 2016 and 2022, depression had increased by 63% . Between 2005 and 2022, individuals with serious mental health illness increased by 41%.

Stockport needs to increase accessibility of Green Space and protect already existing pockets, including Edgeley Wildlife Reserve. Not only for the community it serves but also as part of an approach to deal with the Climate Emergency and Biodiversity Crisis it faces.

I appeal to you, Stockport County, who have a well respected central role within Stockport, promoting exercise for health, to protect the wildlife reserve within Edgeley that means so much to so many, so that it can continue to flourish and provide an essential habitat for our rapidly declining native species whilst also serving as an essential health tool for those that are increasingly in need.

Many Thanks,
Dr Aimee Priestman

Testimony from Local GP / 2

Dear All,

My name is Dr Mugdha Wakodkar and I along with my husband Dr Vishwanath Siddagangaiah are putting this document forward to express our objection to the proposed plan of using Edgeley Wildlife Reserve space for car park development.

We reside at _____, Stockport _____ for the last 7 yrs and have relished the wildlife reserve area in our vicinity.

I have also come across other residents through meetings and talks and the majority feel this proposed plan will be quite disrupting to the wildlife.

There are also thoughts on using some of the wildlife areas for plantation (health professionals initiated) for better and healthy eating and maintaining healthy lifestyles. I am a GP myself and I strongly feel this will be very essential for the community struggling with major health issues and challenges.

We henceforth are coming forward to raise our objection through this email.

Thank you
Dr Mugdha Wakodkar

Testimony from Mental Health Support Worker

To whom it may concern,

My name is Tom Powell and I am a support worker currently working in secondary care mental health services in the Stockport locality. I have been supporting individuals with their recovery from severe and enduring mental health issues for over 14 years. I am writing in support of the Edgeley Wildlife Reserve Group and their campaign to preserve and enrich the area of land behind the South Stand, Edgeley Park.

This area is currently the largest area of land capable of supporting a suitable habitat for wildlife in the Edgeley ward and as such its value from an ecological perspective is tremendous. I am aware that surveys conducted by the Edgeley Wildlife Reserve Group have identified the presence of numerous flora and fauna in the area which will be in danger of being lost should the development continue as currently proposed.

From a mental health perspective, green social prescribing and nature-based interventions play a vital role in improving people's mental and physical wellbeing, fostering a sense of community and reducing loneliness and social isolation. I have seen first-hand the role that interventions such as nature walks, gardening and allotment projects, outdoor arts and cultural activities, foraging groups and conservation projects have in supporting people's recovery from mental illness and promoting mental and physical wellbeing more generally.

There is strong and growing evidence regarding the demonstrable positive impact that access to nature and natural green spaces has on peoples' mental and physical wellbeing. Government funded research by the National Academy for Social Prescribing found that contact and connection with nature was linked to a range of positive mental and physical health outcomes. The research found that nature-based social prescribing can have a positive impact on wellbeing and reduce social isolation. I am aware that this is a sector which is attracting increasing funding for community-led projects, such as the £2.6m Greater Manchester Green Spaces Fund. I believe that this area of land represents a unique opportunity to provide a space capable of hosting such community projects which would benefit the health and wellbeing of the local community.

I understand the desire from Stockport County to continue to develop the club and its infrastructure. I am also very aware of the excellent work that the club do in terms of supporting various groups in the local community including around supporting mental wellbeing. Therefore, I ask that Stockport County consider amending their current plans regarding the development of the South Stand in order to support the preservation of local wildlife and its habitat and in doing so continue the good work the club does in terms of promoting the health and wellbeing of the local community.

Yours Sincerely,
Tom Powell

Nature and Education

It is time to make nature a NORMAL part of childhood again and restore wildlife so it can recover and thrive across urban jungles.

THE WILDLIFE TRUSTS

To sit in long grass and enjoy wildlife in a natural habitat, children in Edgeley need to catch a bus or train.

EWRG

The health benefits of urban green space are well recognised for children, whose physical and mental development is enhanced by living, playing and learning in green environments. The elderly also benefit significantly from visiting green and blue spaces, through improved physical health and social well-being.

European Environment Agency

In order for children to benefit from a richer natural environment close to home, as should be their right, first we have to protect such environments and enhance them. In areas where such environments are rare they need to be identified and designated. Children in Edgeley are deprived of true natural green spaces. Creating such spaces is part of the government's 25 year plan pursuant of legally binding commitments. EWR is the perfect size and location to create, develop and designate a gated nature reserve to serve local primary schools and community groups with educational and health benefitting activities and respite.

Stockport Schools CAN Report 2022:

Stockport Metropolitan Borough Council have a Climate Action Now committee (CAN). CAN created the Stockport Schools Climate Assembly project, *Young Voices*, to hear children's views.

"It sets out that we as a council will take responsibility to act on what they tell us and deliver what is important to them".

In 2022, twenty-three schools from across Stockport attended the town hall to debate the development of climate action ideas to assess what actions schools and colleges could undertake and to tell the council what they wanted them to do.

In the appendix of *The Stockport Climate Action Now (CAN) Schools Climate Assembly Report For Full Council* (dated 14th July 2022) is a section titled: *Full List of Climate Action Ideas Submitted by Young People*.

In that section is a table titled: *Table 1: What Would You Like To See The Council Do To Tackle Climate Change?*

Under the subject of *Biodiversity and Green Spaces*, the answers presented by the seven schools chosen were:

- Bee Zones,
- Protect Green Spaces,
- Make public allotments which have been rewilded,
- Beehives in schools,
- Protect Green Spaces and plant more trees,
- Don't allow building on green spaces
- Rewild areas of council owned parks to provide opportunity for natural habitats.

With this in mind and with consideration to Greater Manchester and Stockports' focus on Green Spaces, as well as legally binding commitments aimed at protecting, restoring and enhancing existing natural habitat; how can the council justify destroying **63,000** square feet of natural habitat (including trees young or mature, undergrowth and grasses) to build a car park (as per the plans of Stockport County Football Club) and justify such plans under the auspiciousness of *improving* the environmental value of Edgeley?

Stockport Schools CAN Report 2023:

In 2023, over 850 young people took part in a climate action lesson at the start of the *Young Voices* project and 130 climate action ideas (all thought up by young people) were submitted to the council as part of the project.

The Town Hall debates took place in March where 78 young people representing 28 schools and colleges took part. The young people voted on which climate action idea they thought was most important, supporting an action around **community gardens** where people can plant and pick fruit and vegetables, reducing the carbon footprint of food. This idea was originally submitted by St Paul's Primary School in Brinnington. **The council has committed to act on this.**

EWR absolutely already does meet the aims of these *Biodiversity and Green Spaces* ideas from children. It has the scope and potential to include provision for a school community food garden.

There are five primary schools within half a mile walking distance of EWR, eight are within a 15 minute walking distance. EWR will be accessible to some of the most deprived children in Stockport. Most of them have very limited school grounds, (some don't even have a blade of grass) limited access to wild space and certainly no access to a fenced, dog free, clean, safe space designated to wildlife and nature.

EWRG have spoken to these schools and five of them said they would value and use this space as a gated resource for school children. The potential of the space EWR offers for our children is paramount.

Many individuals in Edgeley, including children, 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. Access to such areas should be one of the priorities considered in town planning.

The long-term aim of EWR as an urban nature reserve would be to include children in an educational programme of development and care. Without the basis of locally accessible natural habitat there will exist an absence of opportunity in delivering related educational activity based benefits.

Securing this wild space now would be of huge benefit to our children. Access to and protection and restoration of wild space for children in the Edgeley and surrounding communities is a must for consideration in regard to the outline part of this planning application (Ref: # DC/092211) and in regard to the wider legally binding commitments aimed at protecting and improving biodiversity.

Collectively the schools mapped on the following page have a combined pupil capacity of **2,338 local children**.

The CAN School Assembly ideas from these children included creating space for wildlife and providing wild flowers and trees with bird feeders

Match-Going Fan Base Analysis

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

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

Tier 3 Av. Home Attendance

(1993-1997 overall average / 5 seasons: **5,419**)

Tier 2 Av. Home Attendance

(1998 - 2002 overall average / 4 seasons: **7,426**)

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

(2003 - 2005 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

(2006-2008 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

(2009 - 2010 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

(2011 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

(2012 - 2022 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

(2023-2024 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 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.