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Introduction

This part (Part 3: *Ecology & Biodiversity*) argues against the outline part of the planning application (Ref # DC/092211) on the grounds of the ecological value of Edgeley Wildlife Reserve (EWR) and its importance as a biodiversity system in terms of local, national and global relevance and in accordance to legally binding commitments

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

This chapter is concerned with ecology, biodiversity and wildlife habitat and Edgeley Wildlife Reserve Group consider EWR to be **the most important area of wildlife habitat** in the Edgeley district, both in scope of size, potential, and in the benefits it can bring to local communities in health, wellbeing and education.

EWR's current state, its potential, its uniqueness locally, its relevance to the reservoir ecosystem and beyond that the wider river system (covered in Part 5: *Water, Drainage & Flooding*), its connection to existing but as of yet un designated green corridors, and its place in the patchwork of the greater picture of habitat recovery, all bear relevance to commitments made by politicians on local, national and global stages.

As well as being familiar with EWR itself (what it is now and what it can offer in terms of ecology and habitat and the benefits that eco-services can bring), decision makers should, therefore, also be familiar with relevant declarations and commitments made by authorities at global, national and local levels.

Likewise, as plans have been submitted to extinguish an existing wildlife habitat and evoke ideas of 'enhancement' as mitigation, the UK State of Nature Report is essential in understanding the importance of such 'sites' and their importance.

An appendix to this document (3.b.: *Visual Evidence*) delivers a more realistic representation of the importance, value and richness of the habitat in question with a range of general images which should contrast starkly with those chosen to accompany the planner's ecological and environmental reports.

Video and audio media will also be submitted as ancillary but important evidence that EWR already is valuable natural wildlife habitat.

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

Contents

3.0. The Latest State of Nature Report 2023

The State of Nature Report is the most comprehensive peer reviewed survey aimed at understanding the state nature is in nationally. It is compiled and produced by a partnership led by institutional conservation organisations such as The RSPB and The National Trust and scientists, data analysts, nature conservation experts and communicators from more than 60 organisations. It is widely used in various contexts and is considered the most reliable source of accessible data in terms of the state of British wildlife and wildlife habitat in the UK. The report primarily aims to provide broader context, reporting is conducted at a country scale.

The State of Nature Report has been referenced in advising country-level legislation, such as the recent consultation on the Wales Nature Positive White Paper: Environmental Principles, Governance, and Biodiversity Targets.

The full document can be viewed at https://stateofnature.org.uk/

> *The 2023 State of Nature report shows that the **abundance** of species studied in the UK has declined by 19 per cent on average since records began in 1970. But while the most important natural habitats are in poor condition, **work to protect landscapes has clear benefits for nature, people and climate.***
>
> **https://www.nationaltrust.org.uk/our-cause/nature-climate/state-of-nature-report-2023**

Abundance refers to the number of any species present. Distribution refers to how widespread they are. Clearly, loss of habitat effects both abundance and distribution. Loss of abundance leads to loss in distribution and eventually to extinction. Neither distribution nor abundance can recover where suitable habitat or land to create suitable habitat is absent.

Using data from the last fifty years to understand information and trends concerning wildlife species and habitat status, the national State of Nature report found:

- British Birds are in decline by 43%
- British Amphibians & Reptiles are in decline by 31%
- British Fungi and Lichen are in decline by 28%
- More than half of plant species have also declined, as have 59 per cent of mosses and liverworts (bryophytes). Pollinators such as bees and butterflies are among the worst-hit groups, falling by 18 per cent on average.

Abundance and Compensation

The decline in abundance of our wildlife is accelerating. Numbers of birds alone are 43% less than they were 50 years ago. The number of birds has almost halved in FIFTY YEARS.

Even comprehending this, after, arguably 3,500 years of British occupation since the Copper Age, is monumental. Now that the situation is recognised nationally (as well as globally) it is equally difficult to comprehend the lack of designation of such sites as EWR at local level.

Only by starting at local levels can anything change. Already an existing refuge locally, with enhancement, EWR as it is now, offers real potential in contributing toward stemming these declines nationally.

Already right beside a gated reservoir, scope exists for the construction of additional scratch ponds, creation of reed beds, dead wood piles, the enhancement of woodland and much more.

Exploring the feasibilities of opening up the natural spring water rivulet (open beyond the boundary to the reservoir) to create further natural habitat and reed beds is another option that can be considered.

On any level, nationally or locally, existing fungi and lichen, mosses and liverworts along with microbial habitat can not be replaced by so called compensation measures presented by developers or the ecologists that they employ.

Destroying habitat for car parks based upon ecology reports provided by developers which independently categorize them as poor or moderate removes the opportunity to improve and enhance them.

Current legislation and policy is a cohesive retreat, a managed surrender, of what we have left. If you can imagine that Greater Manchester was once a patchwork of great woods, meadows, moors and heaths, with springs and streams and clear rivers (what we used to refer to as forest), you can imagine that the little areas we have left in urban zones are the last survivors of a great battle. They deserve pity and care, they need protecting and picking up.

In local, and as a result, national terms, in respect to biodiversity, as well as categorizing areas of a single site in terms of good, moderate and poor, ecologists should be dutifully and professionally bound to qualify any site's condition based upon a rank in respect to its local significance. The ecology report provided by Bowland fails to do that.

If it did, as far as Edgeley is concerned, EWR ranks top! Number One! The best wildlife habitat in the area. If it did it would find that, as far as Edgeley is concerned, EWR is the best chance British wildlife has.

> *"'With report after report documenting the critical state of UK nature* ***we can no longer fiddle around the edges in the hope that will be enough to make everything ok.*** *'It's not too late to act. But we need to do it now.'"*
>
> **Hilary McGrady, Director-General for the National Trust / https://www.nationaltrust.org.uk/our-cause/nature-climate/state-of-nature-report-2023**

It should be understood by planners and decision makers that mitigation and compensation is **not** the same thing as protection, restoration and enhancement. Edgeley Wildlife Reserve Group believe that SCFC's current outline plans in regard to mitigation and compensation do not benefit protection, restoration or enhancement of existing wildlife habitat.

> *The UK now has less than half of its biodiversity remaining because of human activity. The UK is currently classified as one of the world's most nature-depleted countries.*
>
> **https://www.nationaltrust.org.uk/our-cause/nature-climate/state-of-nature-report-2023**

Edgeley Wildlife Reserve Group is concerned that Stockport Metropolitan Borough Council do not recognize urbanisation/urban development as a driving factor behind loss of wildlife habitat.

> *"The UK has set ambitious targets to address nature loss through the Global Biodiversity Framework, and although our knowledge of how to do this is excellent, the size of the response and investment remains far from what is needed given the scale and pace of the crisis."*
>
> **State of Nature Report 2023**

By failing to provide accurate up-to-date data on wildlife and habitat loss which national and global frameworks reply upon; failing in mapping potential wildlife habitat to inform decisions; and failing to establish strategies and action plans to protect, restore and enhance nature, SMBC would be failing to adhere to legally binding commitments.

> *"The UK continues to be one of the most nature-depleted countries in the world."*
>
> **Cheshire Wildlife Trust**
>
> *"The UK is currently classified as one of the world's most nature-depleted countries."*
>
> **National Trust**

Stockport is not immune to the effects of biodiversity crisis. The statistics are world-wide.

3.1. Declarations and Commitments by Authorities

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 Manchester Combined Authority in 2022.

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

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

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.

3.1.1. Commitments - Global

> *By the end of the century, half of all species could be facing extinction. The rate of species extinction is up to 10,000 times higher than the natural, historical rate. Scientists have labelled **the biodiversity crisis** as worse than the threat from climate change. Over 37,000 species are directly threatened with extinction. That is 28 % of all species assessed.*
>
> **The World Counts • Impact through Awareness**

A United Nations report into *Nature's Dangerous Decline* established that *'current global responses were insufficient'*; that '*transformative changes are needed to restore and protect nature'*; and that *'opposition from vested interests can be overcome for public good*'. This means that action at **local level i**s necessary to effect changes to our planet's **overwhelmed biodiversity.**

> *"The Report also tells us that it is not too late to make a difference, but only if we start now at every level from **local** to global," he said. "Through 'transformative change', nature can still be conserved, restored and used sustainably – this is also key to meeting most other global goals. By transformative change, we mean a fundamental, system-wide reorganization across technological, economic and social factors, including paradigms, **goals and values**."*
>
> **IPBES' 2019 Global Assessment Report on Biodiversity and Ecosystem Services**

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

The GBF contains four overarching goals and 23 targets.
The four goals set out a vision for biodiversity by 2050:

Goal A:

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.

Goal B:

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

Goal C:

Share the monetary and non-monetary benefits of the utilisation of genetic resources, digital sequence information on genetic resources, and traditional knowledge associated with genetic resources with Indigenous people and local communities. Additionally, ensure traditional knowledge associated with genetic resources is appropriately protected.

Goal D:

Ensure all parties (specifically developing countries) have adequate means to implement the GBF. This includes financial resources, capacity building, technical and scientific cooperation, and access to technology.

3.1.2. Commitments - National

The UK has made **commitments** to reducing biodiversity loss in England. *The Environment Act 2021* includes **legally binding** targets for the government to help the UK meet its international commitments and has agreed to and signed the *International Convention of Biological Diversity (CBD).*

Each country's commitments will be monitored through updated National Biodiversity Strategies and Action Plans. Countries will also submit national reports on progress to the CBD's governing body in 2026 and 2029.

3.1.2.a. **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 it's *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**
- Ensuring the $700 billion per year in funding, mainly from richer to less developed countries, needed to reverse biodiversity loss

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.

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 opportunities which would come of protecting and restoring EWR would also be lost. These, human orientated benefits are covered in other parts and chapters of this document.

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. Part 4 of this document

(*Community, Health & Education)* provides various arguments as to why EWR should be considered valuable habitat for the prosperity of humans, locally and nationally.

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 area 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 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.**

UK Progress on Meeting International Targets

The difficulties in addressing biodiversity loss were reflected in the UK's 2019 report on progress. It found that the UK had only fully met five of the 20 targets.

The Royal Society for the Protection of Birds (RSPB), a nature conservation charity, concluded in 2020 that governments across the UK fell most short of the targets *"which actually make a difference for species or habitats"*, calling the 2010s a *"lost decade"* for nature.

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

New Domestic Targets for England

In England the *Environment Act 2021*, and subsequent regulations, set **legally binding biodiversity targets**, which will contribute to meeting international obligations. The targets are:

- to reduce the risk of species going extinct in 2042, compared with 2022
- to **create or restore** 500,000 hectares of wildlife-rich habitats by 2042
- to ensure overall species abundance **is increasing rather than decreasing** by 2030, and increases by 10% by 2042, compared with 2030

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

This is an **addition to the commitment the government has made** to meet the CBD's 30 by 30 target (see Interim Targets below).

500,000 hectares, roughly 2,000 square miles, is roughly the size of North Wales. It will be absolutely necessary to engage on local levels to meet such a commitment. In order to contribute to this target

Stockport must begin to identify and designate spaces it can create and restore into wildlife-rich habitats. Verges, verges with trees, small green islands in the middle of car parks (however biodiversly planted), piecemeal and fragmented attempts at mitigation and compensation can not be considered the creation of wildlife-rich habitat. Destroying habitat in areas already deprived of habitat, destroying the only areas of habitat in communities, will mean Stockport is adding to the negative trend and adding to the failure of reaching targets the United Kingdom is committed to.

Local and overall species abundance cannot improve unless the sum total of true habitat created is greater than that lost. Habitat and ecology concerns differ from climate and carbon concerns in that the current model of compensatory planting of trees does not realistically replace existing true habitat with all of its biological aspects. Offsetting by planting sapling trees can rarely replace habitat for species because it is often done piecemeal in smaller fragmented locations within harsh urban situations. It is a tactic used at meeting carbon omission challenges and should be regarded as such. Lone trees planted in paving in an urban setting will offset carbon and qualify as BNG but will not provide secure nesting sites for birds or adequate undergrowth for mammals to flourish.

> *While biodiversity offsets may be generally a valuable tool for biodiversity conservation, their applicability may be limited in certain situations. For example, some areas with important cultural and ecological values (sacred areas and groves, areas with high levels of* ***endemism)*** *should be* ***off-limits for development and offsets****. Furthermore, it is important that offsets should only be considered at the end of the mitigation hierarchy where unavoidable residual impacts remain.*
>
> **Incentive measures for the conservation and sustainable use of biological diversity**
> **CBD**

In December 2023, Natural England summarised the measures the UK is taking. It includes creating a Nature Recovery Network and strengthening the remit of National Parks and National Landscapes to support nature recovery. Local authorities should also consider Nature Recovery Networks which can identify existing habitats that can be protected, restored, enhanced and designated.

Interim Targets

> *The Environment Act 2021* targets are supported by a series of interim targets (to 2028), as set out in the government's *2023 Environment Improvement Plan*. However the environmental watchdog, the Office of Environmental Protection, concluded in January 2024 that *"as things stand the prospects of meeting key targets and commitments are largely off track"* for biodiversity. This was because many policies were still in development.
>
> As nature conservation is a devolved policy area, Scotland, Wales and Northern Ireland have their own biodiversity targets and strategies. The four UK administrations published a joint *UK Biodiversity Framework* in May 2024, which aims to coordinate efforts to meet the UK's international obligations.
>
> **Biodiversity loss: The UK's international obligations. https://commonslibrary.parliament.uk/biodiversity-loss-uk-international-obligations/ Published Thursday, 11 July, 2024**

Interim targets have been set according to the categories listed below.

i. Reducing threats to biodiversity

TARGET 1: Plan and Manage all Areas To Reduce Biodiversity Loss
TARGET 2: Restore 30% of all Degraded Ecosystems
TARGET 3: Conserve 30% of Land, Waters and Seas
TARGET 4: Halt Species Extinction, Protect Genetic Diversity, and Manage Human-Wildlife Conflicts
TARGET 6: Reduce the Introduction of Invasive Alien Species by 50% and Minimize Their Impact
TARGET 7: Reduce Pollution to Levels That Are Not Harmful to Biodiversity
TARGET 8: Minimize the Impacts of Climate Change on Biodiversity and Build Resilience

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

TARGET 9: Manage Wild Species Sustainably To Benefit People
TARGET 10: Enhance Biodiversity and Sustainability in Agriculture, Aquaculture, Fisheries, and Forestry
TARGET 11: Restore, Maintain and Enhance Nature's Contributions to People
TARGET 12: Enhance Green Spaces and Urban Planning for Human Well-Being and Biodiversity
TARGET 13: Increase the Sharing of Benefits From Genetic Resources, Digital Sequence Information and Traditional Knowledge
TARGET 14: Integrate Biodiversity in Decision-Making at Every Level

iii. Tools and solutions for implementation and mainstreaming

TARGET 15: Businesses Assess, Disclose and Reduce Biodiversity-Related Risks and Negative Impacts
TARGET 16: Enable Sustainable Consumption Choices To Reduce Waste and Overconsumption
TARGET 18: Reduce Harmful Incentives by at Least $500 Billion per Year, and Scale Up Positive Incentives for Biodiversity
TARGET 22: Ensure Participation in Decision-Making and Access to Justice and Information Related to Biodiversity for all

The strategies and targets are covered in detail in the following pages along with their relevance to Edgeley and Stockport.

Note: Targets 5, 17, 19, 20, 21, and 23 are not applicable and are not included in this document.
The full list of targets can be found at https://www.cbd.int/gbf/targets.

3.1.2.b. **Interim Targets Set by the CBD and Agreed by UK Government**

Reducing Threats to Biodiversity

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

Ensure that all areas are under participatory, integrated and biodiversity inclusive spatial planning and/or effective management processes addressing land- and sea-use change, to bring the loss of areas of high biodiversity importance, including ecosystems of high ecological integrity, close to zero by 2030, while respecting the rights of indigenous peoples and **local communities.**

Reason for Importance:

Land-use and sea-use change are major direct drivers of biodiversity loss.

Increasing demands and **conflicting uses of land**, inland water and ocean space and resources underscore the need for cross-sectoral approaches that allow for the **consideration of multiple interests, values and types of use**. Integrated spatial planning and/or effective management processes allow countries to analyse and then effectively allocate the spatial and temporal distribution of activities in each environment to achieve various social, ecological and economic objectives. Integrated and participatory spatial planning helps bring together all stakeholders for a particular space and thereby ensure the prioritization and proper allocation of various activities and thereby balance the need to safeguard nature, while advancing sustainable socioeconomic development and ensuring food security and human well-being. **The ecosystem approach as well as the many examples of guidance and experience in implementing this approach also provide a strong basis for this target.**

Explanation:

This target aims to ensure that all areas are under spatial planning or other effective management with the purpose of **addressing the driver of land use change** or sea use change and of bringing the loss of areas of high biodiversity importance close to zero by 2030.

Guiding Questions For National Target Setting

What spatial planning or related management processes already exist in your country? Are these processes participatory, integrated and biodiversity-inclusive? **How effective are these processes in bringing the loss of areas of high biodiversity importance close to zero?** Do they need to be amended to **account for and integrate biodiversity considerations?** Do they respect the rights of indigenous peoples and **local communities?**

Which authorities and stakeholders, and at which levels (e.g., national, subnational), play an active role in spatial planning or related management processes? What are their respective roles? How can collaboration be promoted to ensure biodiversity elements/concerns are considered in their work?

What additional resources (e.g., financial, human, technical) will be required to take actions to reach this target? How can additional resources be raised?

What measures are necessary to ensure the preservation and protection of the rights of indigenous peoples and local communities while implementing this target?

Which areas in your country are considered to be of high biodiversity importance, and/or high ecological integrity? What are the current rates of loss of areas of high biodiversity importance in your country?

TARGET 1: **Summary and relation to EWR**

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

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

This commitment dictates that:

a) authority, identify the existing biodiverse nature of habitats such as EWR and consider it in spacial-planning

b) assess the existing biodiverse nature of habitats such as EWR within a (relative) environmental setting in order to allocate land-use and relative balance of land-use within that environmental setting.

c) authorities use the ecosystem approach to prioritise land-use within measured environmental settings, including the need to safe-guard nature, food security and human well-being.

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

TARGET 2: Restore 30% of all Degraded Ecosystems

Ensure that by 2030 at least 30 per cent of **areas** of degraded terrestrial, inland water, and marine and coastal ecosystems are under effective restoration, in order to enhance biodiversity and ecosystem functions and services, ecological integrity and connectivity.

Why is this target important

Habitat degradation is the result of human-induced processes that result in a decline in biodiversity, ecosystem functions and services, and resilience and can occur in terrestrial, freshwater or marine and coastal ecosystems.

The main direct drivers of land degradation are the expansion of crop and grazing lands into natural areas, unsustainable agricultural and forestry practices, climate change, and, in specific areas, **urban expansion, infrastructure development** and extractive industry. **Habitat loss through transformation** and the **decline in the suitability of the remaining habitat through degradation** are the **leading causes of biodiversity loss.**

Explanation

Restoration – Restoration refers to the process of **actively managing the recovery of an ecosystem that has been degraded**, **damaged or destroyed**. Restoration activities can be undertaken for a variety of reasons and across a continuum of actions. For example, ecological restoration includes efforts to increase the area of a natural ecosystem and its integrity through recovering an ecosystem that has been degraded or destroyed, this includes conversion of non-natural transformed ecosystems back to a natural ecosystems state.

Effective–In order for restoration activities to be effective, they need to be appropriately resourced and monitored over time. Further, the potential for restoration should not be regarded as a justification for the further degradation of ecosystems. The target does not require areas to be restored, given that restoration is a long-term process, but that effective restoration activities have been initiated.

Degraded ecosystems - Degradation refers to a persistent (long-term) reduction in the capacity to provide ecosystem services. Degraded land includes natural ecosystems which have included a loss of ecosystem functions and services and transformed ecosystems (such as agricultural areas).

Terrestrial, inland water, marine and coastal ecosystems– The Target specifies the need to restore all types of ecosystems whether terrestrial, inland water or marine and coastal..

Enhance biodiversity and ecosystem functions and services – While restoration activities can be undertaken for various reasons, this target specifies that such activities should be undertaken for the purposes of enhancing biodiversity and ecosystem functions and services, ecological integrity and connectivity.

Connectivity and integrity – An area with high ecological integrity is one which has a composition, structure, function and ecological process close to that of a natural ecosystem. Connectivity ensures the maintenance of natural species habitats. Taking into account both objectives is an important consideration in the design of restoration activities.

Guiding Questions for national target setting

What areas in your country are currently degraded?

What are the opportunities and constraints in undertaking ecosystem restoration, generally and by habitat?

What are the trade-offs to consider (potential ecological, economic, and social costs and benefits) in undertaking restoration in specific habitats?

TARGET 2: **Summary and relation to EWR:**

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

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

For the last few decades, nature has reclaimed EWR and though it remains degraded due to subterranean urban footprints in parts, it is classified as woodland, scrub and grassland by ecologists.

It is, as far as the current state of nature, and these targets go, already a success story. Destroying such a success story which can contribute toward committed targets, would be contrary to those targets agreed to by authority and contribute toward the decline of the state of nature in the UK.

Recognising that natural water is an important resource, among other things, Edgeley Wildlife Reserve Group would seek examining the feasibility of opening up the currently piped spring water rivulet to provide further habitat (such as the introduction of reed beds) for species and to enhance the existing ecosystem.

In regard to 'trade-offs to consider', the argument against a car park upon EWR is covered elsewhere in this document. See: Part 7: (*Alternatives*).

Note: "Ensure that by 2030 at least 30 per cent of **areas** of degraded terrestrial, inland water, and marine and coastal ecosystems are under effective restoration…" doesn't mean 30% of particular areas but 30% of all whole areas combined.

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

Ensure and enable that by 2030 at least 30 per cent of terrestrial and inland water areas, and of marine and coastal areas, especially areas of particular importance for biodiversity and ecosystem functions and services, are effectively conserved and managed through ecologically representative, well-connected and equitably governed systems of protected areas and other effective area-based conservation measures, recognizing indigenous and traditional territories, where applicable, and integrated into wider landscapes, seascapes and the ocean, while ensuring that **any sustainable use, where appropriate in such areas, is fully consistent with conservation outcomes,** recognizing and respecting the rights of indigenous peoples **and local communities**, including over their traditional territories.

Why is this target important

Well-governed, effectively managed and representative **protected areas and other effective area-based conservation measures (OECMs)** are a proven method for safeguarding both habitats and populations of species and for delivering important ecosystem services and **multiple benefits to people.** They are a central element of biodiversity conservation strategies at **local,** national and global levels. Protected areas and OECMs can take various forms, ranging from strictly protected areas to areas that allow sustainable use consistent with the protection of species, habitats and ecosystem processes.

Explanation

This target calls for the **expansion** and enhancement of protected and conserved areas, (i.e. areas that are managed with the aim of achieving positive outcomes for biodiversity).

Protected areas –The Convention on Biological Diversity defines a protected area as geographically defined area which is designated or regulated and managed to achieve specific conservation objectives. IUCN has established a categorization of protected areas.

Other effective area based conservation measures – These are a geographically defined area other than a protected area, which is governed and managed in ways that achieve positive and sustained long-term outcomes for the in situ conservation of biodiversity, with associated ecosystem functions and services and where applicable, **cultural, spiritual,** socio–economic, and other **locally relevant values.**

Indigenous and traditional territories – Indigenous peoples and **local communities** often own, occupy and/or manage areas with unique and significant biodiversity. **The appropriate recognition of these areas could make important contributions towards this target.** However, any decisions regarding these areas must recognize and respect the rights of indigenous peoples **and local communities** over them and including obtaining free, prior and informed consent.

Areas of particular importance for biodiversity and ecosystem functions and services – Areas particularly important for biodiversity include areas high in species richness or

threatened species, **threatened biomes and habitats**, areas with particularly important habitats and **areas that are important for the continued provision of ecosystem functions and services.** The protection of such areas should be **prioritised** in reaching this target

Well-connected – In order for protected areas and OECMs to be effective, they should be **connected through corridors** as well as integrated into wider landscapes, seascapes and the ocean. This is an essential element of **creating effective systems or networks of protected and conserved areas** that can meet sustained in situ conservation outcomes and cope with stresses and disturbances, including from the impacts of climate change.

Equitably governed – A key element of the equitable governance of protected areas and OECMs is ensuring that relevant actors are involved and able to fully participate in their establishment, management and governance and that the costs and benefits of establishing and managing such areas are shared fairly. It also includes effective participation in decision-making, transparent procedures, access to justice in conflicting situations, and the recognition of the rights and diversity of the people that will be affected by the establishment and management of protected areas and OECMs.

The rights of indigenous peoples and **local communities** - all activities carried out under this target must be done so recognizing and respecting the rights of indigenous peoples and local communities, including over their traditional territories. This includes, as specified in Section C of the Kunming-Montreal Global Biodiversity Framework that rights, knowledge, including traditional knowledge associated with biodiversity, innovations, worldviews, values and practices of indigenous peoples and **local communities** are respected, and documented and preserved with their free, prior and informed consent, including through their full and effective participation in decision-making, in accordance with relevant national legislation, international instruments, including the United Nations Declaration on the Rights of Indigenous Peoples.

Guiding Questions For National Target Setting

What is the current extent of protected areas and OECMs on land, in inland waters and in marine and coastal areas in the country? How representative are these areas of the ecoregions in the country? Do these areas cover areas particularly important for biodiversity, ecosystem functions and services? How are they connected and integrated into the wider landscape, sea scape and ocean?

Which areas of importance for biodiversity and ecosystem services are not currently protected? Which areas are underrepresented? Which habitats are declining the quickest? Which habitats have little left?

What are the opportunities and constraints to expanding protected areas and OECMS, generally and by eco-region? What are the potential ecological, economic, and social costs and benefits of additional protected areas and how could these be shared? Who are the actors, including indigenous and local communities, that may be affected? How can they be involved, and their rights and needs addressed? What are the trade-offs to consider?

TARGET 3: S**ummary and relation to EWR**

This interim target is concerned with the adequate conservation and management with appropriate measures and designation, of areas important for biodiversity and local and wider ecosystems.

In order to contribute toward achieving this target it is important that Stockport work toward identifying the value of such areas as EWR.

The multiple benefits of area-based conservation measures, in particular in regard to EWR, and in context to the deprived state of access to nature in Edgeley, are covered in more detail in Part 4: Community, Health & Education of this document.

Achieving the safeguarding of habitats and species is a target which cannot be attained by allowing the destruction of existing habitats, especially, as is the case with EWR, when those habitats already exist as secure refuges for species.

To Edgeley, and the wider area, argued further in this document in regard to green corridors and wider water systems, EWR is central to concerns of natural habitat and therefore should be central to local authority conservation strategy.

EWR should be recognised as a prime example of a local area which can be designated as a protected area / OECM with the aim of reaching the committed target of expanding and enhancing areas managed with the aim of achieving positive outcomes for biodiversity.

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

Ensure urgent management actions to halt human induced extinction of known **threatened species** and for the **recovery and conservation of species**, in particular threatened species, to significantly reduce extinction risk, as well as to maintain and restore the genetic diversity within and between populations of **native, wild and domesticated species** to maintain their adaptive potential, including through in situ and ex situ conservation and sustainable management practices, and effectively manage human-wildlife interactions to minimize human-wildlife conflict for coexistence.

Importance

Though some extinctions are the result of natural processes, human actions have greatly increased current extinction rates and risk. The global species extinction rate is at least tens to hundreds of times higher than the average over the past 10 million years, and the rate is increasing. About 1 million species are currently threatened with extinction. The global increase in extinction and extinction risk is also contributing to the decline of genetic diversity. Genetic diversity is critical for the long-term stability, adaptability and resilience of biodiversity, both at the species and ecosystem levels, and it supports the continued provision of nature's contributions to people. Various species-specific management interventions will be needed to ensure the conservation of species.

Explanation

This target has three distinct but related components:

(a) management actions need to be taken to halt human-induced extinctions by 2030 and to reduce extinction risk, in particular for threatened species.

(b) management actions need to be taken to maintain and restore genetic diversity, among all species.,

(c) **action needs to be taken to manage human-wildlife interactions to minimize human-wildlife conflict.**

To address these three components, this target identifies several elements that need to be taken into account:

Management actions – Management actions focused on the recovery of threatened species could include species reintroductions, species recovery actions (such as vaccinations, supplementary feeding, provision of breeding sites, planting and protection of seedlings) and ex situ conservation where needed. Management actions for the conservation of genetic resources within species, including for crops and livestock and their wild relatives, include ex situ conservation and in situ conservation. For domesticated species the latter includes on-farm conservation.

Halt human-induced extinction and reduce extinction risk – A fully recovered species is one that is viable and that fulfills its ecological roles in the ecosystems throughout its native range. Further, conservation refers to the **protection, care, management and maintenance of ecosystems, habitats, wildlife species and populations, within or outside of their natural environments**, in order to safeguard the natural conditions for their long-term permanence.

Known threatened species – This target relates specifically to known threatened species. Different approaches are used to assess the threat status of species, and many countries have their own lists of threatened species. Globally, IUCN's Red List of Threatened Species lists more than 42,100 species as being threatened.

Maintain and restore genetic diversity – The genetic diversity of wild species provides the variation essential to maintain ecosystem stability and ensure benefits to people, and supports species survival and adaptation, linking explicitly to ecosystems and species.

Wild and domestic species – Actions should be taken to maintain the genetic diversity of both wild and domestic species.

Manage human-wildlife interactions and conflict – Some types of human-wildlife interactions can be positive or neutral for people and biodiversity. However, some interactions can lead to conflicts, including over resources and space, resulting in adverse effects on human life, health, well-being and/or livelihoods. As a result of those actions and threats, humans may damage or eliminate wildlife, either intentionally or unintentionally. **Many types of human-wildlife conflicts can be mitigated or avoided through appropriate planning, management and compensation measures.**

Guiding Questions For National Target-Setting

What species are currently threatened or at risk of extinction in your country? Which species are near threatened? Where are threatened species located in your county? Which species are likely to go extinct without urgent action?

What are the main threats to the threatened species? Which can be addressed through management actions, and which require broader approaches?
What are the opportunities for and constraints to preventing species from becoming extinct? What are the potential ecological, economic and social costs and benefits of preventing the extinction of certain species?

What are the sources of human-wildlife conflict in the country? How are these currently being addressed? How effective have these measures been? Who are the actors 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 take action on this target? How can additional resources be raised? What are possible sources?

TARGET 4: **Summary and relation to EWR**

This interim target is concerned with conflicts between wildlife and human activity and with species extinction and protecting genetic diversity.

Section 3.0 (*State of Nature Report)* of this part (*Ecology and Biodiversity*) is relevant to understanding the relevance of species abundance and decline.

As well as particular species threatened by extinction, the target committed to, aims to improve the recovery and conservation of **all species**. Decline of habitat leads to decline of abundance which in the long term leads to extinction risk.

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

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

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

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

Destroying, fragmenting and/or minimising the size of EWR's existing woodland, scrub and grassland habitat which is also important to the local ecosystem of reservoirs and the wider ecosystem through water networks (see Part 5: *Water, Drainage & Flooding*) and potentially officially designated green corridors provided by railway embankments, to construct a car park, is detriment to all aspects of this target and will introduce rather than minimize human-wildlife conflict.

As more ecological and environmentally friendly alternatives to a car park upon EWR exist, human-wildlife conflict can be avoided through appropriate planning and re-design at architectural level. (See Part 7: *Alternatives*).

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

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

Eliminate, minimize, reduce and or mitigate the impacts of invasive alien species on biodiversity and ecosystem services by identifying and managing pathways of the introduction of alien species, preventing the introduction and establishment of priority invasive alien species, reducing the rates of introduction and establishment of other known or potential invasive alien species by at least 50 per cent by 2030, and **eradicating or controlling invasive alien species**, especially in priority sites, such as islands.

Importance

Invasive alien species are one of the main direct drivers of biodiversity loss. In some ecosystems, such as islands, invasive alien species are the leading cause of biodiversity decline. Invasive alien species affect biodiversity by competing with native species for resources, by direct predation or by introducing pathogens. They also modify the composition and structure of ecosystems, reducing the services they provide. In addition to their environmental impacts, invasive alien species pose a threat to food security, human health and economic activities. Globalization and an associated increase in human-mediated activities, such as international transport, trade and tourism, have made the movement of species beyond natural bio-geographical barriers easier and quicker, by creating new introduction pathways. Due to the wide and crosscutting impacts of IAS, including environmental, economic, health, social and cultural impacts, it is necessary to strengthen collaboration across sectors and government agencies at all levels and areas to ensure that this threat is managed effectively.

Explanation

This target focuses on eliminating, minimizing, reducing or mitigating the impacts of invasive alien species in two main ways: (a) by identifying and managing pathways to preventing their introduction and establishment and (b) by eradicating or controlling invasive alien species that have been introduced and established. To accomplish this, the target identifies a set of elements that need to be considered:

Invasive alien species – Invasive alien species are alien species (introduced outside their natural ranges) that threaten biological diversity and ecosystem integrity. Species in all taxonomic groups and from all types of ecosystems have the potential to become invasive. While a small percentage of alien species become invasive, their negative impacts can be severe. These often go beyond environmental changes and affect economic activities, food security, health or social and cultural values. This target calls for these impacts to be eliminated, minimized, reduced or mitigated.

Pathways are identified and managed – Pathways, are the means by which alien species are introduced to new environments. Depending on the ecosystem, there are likely to be a number of different pathways for the introduction of alien species. Pathways can be intentional (through different human-related activities) or accidental, such as escapes,

contaminants or hitchhikers. Major pathways will vary between countries and will need to be identified in order to be effectively managed.

Preventing introduction and establishment – Preventing the introduction of an invasive alien species is more cost effective then eradicating it once it has become established. Conducting a risk analysis prior to the introduction of an alien species as well as enhancing border controls and quarantine, early warning mechanisms, rapid response measures and management plans are the types of actions that could be taken to help prevent the establishment of alien species.

Prioritization – In most countries, there are likely to be several invasive alien species, multiple pathways of introduction and several sites that require protection. Given the limited resources that exist to address this threat and the timeframe for the implementation of the Framework, Parties will need to prioritise the pathways, sites and invasive alien species they wish to address.

Eradicating or controlling – Once an invasive alien species has been identified and prioritized, and priority sites defined, countries will need to determine management actions. Whether an invasive alien species is eradicated or controlled will depend on a number of factors, including the species being considered, the ecosystem it is affecting, and the magnitude of its impacts. This requires a case-by-case process, taking into account different methodologies (modern innovative tools as well as traditional approaches). In most cases a combination of methods will likely be required, and the most effective control or eradication method will depend on the type of invasive alien species and the ecosystem in which it is found.

Guiding Questions For National Target Setting

Which invasive alien species are currently in the country? What ecosystems are they affecting and how? Which species are having the greatest impact? Are they affecting human health, food production and/or the economy?

What are the main pathways for the introduction of invasive alien species in the country? What border control and quarantine measures are in place?

What measures are in place to assess and monitor the risks of introduction? How effective have these been? How could their effectiveness be improved? What lessons have been learned from their implementation?

What measures are in place in your country to prevent, manage, control and eradicate invasive alien species the introduction of invasive alien species? How effective have these been? How could their effectiveness be improved? What lessons have been learned from their implementation?

What coordination and collaboration mechanisms are in place to address invasive alien species? How effective have these been? How could their effectiveness be improved?

What are the opportunities and constraints for preventing the introduction of, controlling or eradicating invasive alien species and managing their pathways?

What programmes or initiatives could be further built on?

What are the potential ecological, economic and social opportunities and constraints in taking action towards this target? 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 address this target? How can additional resources be raised? What are possible sources?

TARGET 6: S**ummary and relation to EWR**

Japanese Knotweed is present within EWR, particularly in the northwestern corner. Though, whether Japanese Knotweed provides any form of habitat is not considered, it is non-native and identified as an invasive species with particular negative and destructive impacts. Therefore, its presence is responsible for a degree of reduced native ecology and ecosystem service upon the overall biodiversity quality of EWR.

Increase in human activity, particularly the construction industry, is responsible for the spread of Japanese knotweed from its immediate areas due to its spore driven reproduction system. JKW is therefore classed by authority as 'hazardous waste'.

Construction of a car park upon EWR will not achieve the reduction of pathways (spread) of Japanese Knotweed but will likely exacerbate the problem. Management and elimination of the knotweed is the only viable option.

Knotweed roots can lie dormant up to 3m underground for up to 20 years and emerge through weaknesses in man made materials such as brick and paving. The risk of this happening after any construction of a car park with heavy footfall upon EWR would enable spores to be transported by human agency throughout a much wider area. Therefore, the risk of existing knotweed spores re-generating is best dealt with behind a gated and managed area.

If current efforts to destroy the knotweed within EWR by chemical means fail, Edgeley Wildlife Reserve Group would seek to examine the feasibility of more holistic methods.

This would involve the procurement of goats to consume the leaf and stalk, and, thereafter boar/swine to consume the root. This would be carried out after first surrounding the areas most effected with a boundary fence including within a wintering shelter for the animals. We envision that the animals chosen for this would be accommodated on a fostering basis with the intention of moving them on to wider pastures, national parks, and/or animal sanctuaries/petting zoos thereafter. The temporary or long term presence of such animals would be an element which might be an added attraction to the use of EWR for therapeutic, educational and health benefits of local community and groups.

The outcome of any holistic efforts in eliminating JKW should also be of interest to science. It would offer an opportunity to measure, analyse and collect relevant data on the method.

> *Priority action: Continue to implement the Invasive Non-Native Species Framework Strategy for Great Britain*
>
> *We will continue to develop the following key areas:*
>
> *the evidence base – to support proportionate and effective decision-making;*
> ***Biodiversity 2020***
> ***Defra***

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

Reduce pollution risks and the negative impact of pollution from all sources by 2030, to levels that are not harmful to biodiversity and ecosystem functions and services, considering cumulative effects, including: (a) by reducing excess nutrients lost to the environment by at least half, including through more efficient nutrient cycling and use; (b) by reducing the overall risk from **pesticides** and highly hazardous chemicals by at least half, including **through integrated pest managemen**t, based on science, taking into account food security and livelihoods; and (c) by preventing, reducing, and working towards eliminating plastic pollution.

Importance

Pollution is one of the main direct drivers of biodiversity loss. Pollution can take various forms. However globally, pollution from nutrients, such as nitrogen and phosphorus, pesticides and highly hazardous chemicals and plastics has been found to have particularly harmful impacts on biodiversity and ecosystem functions and services.

Explanation

The overall objective of this target is to reduce the risks and negative impacts from all types of pollution by 2030. The target has further components addressing specific pollution types that are known to have particularly harmful impacts on biodiversity globally, namely (1) excess nutrients (2) **pesticides and highly hazardous chemicals** and (3) plastic pollution. In the case of excess nutrients, and the risks from pesticides and highly hazardous chemicals, the target specifies a quantitative element; reduction by half. The target further identifies a number of elements that need to be taken into account when taking action towards this target:

Reduce pollution risks and negative impact of pollution – The target focuses on the risks and impacts of pollution rather than absolute amounts of pollutants, in terms of the different toxicity and/or hazards posed by different types pollutants. For example, some types of pesticides can be used in large quantities with relatively small impacts on the environment, while for others even limited use can have particularly detrimental impacts. A focus on risks and impacts rather than absolute amounts of pollution accounts for this distinction.

From all sources – Pollution refers to contaminants that are introduced to the environment, resulting in instability or harm. Pollution can take numerous forms as a variety of chemical compounds, types of light and sound, and products can cause environmental damage depending on their properties and concentrations. All sources of pollution should be considered when taking action towards this target.

Levels that are not harmful to biodiversity and ecosystem functions and services – The target further specifies that the risks and negative impacts of pollution should be brought to levels that are not harmful to biodiversity and ecosystem functions and services.

Therefore, the target does not require that all pollutants be eliminated but does require that they are reduced to a point where they do not have a negative effect on biodiversity. The point at which pollution can be considered harmful depends on the type of pollutant considered as well as the biodiversity it is affecting. Different metrics may be needed for different types of pollution.

Considering cumulative effects – Some types of pollution can accumulate in the environment or species (bioaccumulation) over time. Similarly, some types of pollution can interact in synergistic ways, augmenting their overall negative impacts. These compounding impacts of pollution need to be accounted for when taking action towards this target.

Reducing excess nutrients lost to the environment – Excess nutrients, especially nitrogen and phosphorus, is a globally significant type of pollution with impacts on biodiversity. For example as nitrogen and phosphorus are often limiting nutrients in ecosystems, when they are present in excessive quantities they can result in rapid plant growth or algal blooms in marine ecosystems, which can alter ecosystem composition and function. Common causes of excessive nutrients are sewage and agricultural runoff, including from the historic and ongoing application of fertilizers. The target specifically calls for excess nutrients lost to the environment to be reduced by half.

Risks from pesticides and highly hazardous chemicals – Pesticides are any substance, or mixture of substances, of chemical or biological ingredients intended for repelling, destroying or controlling unwanted live organisms that are harmful to human, crops, or animal health or to the environment, or that can cause damage to human activities. There are different definitions of highly hazardous chemicals but generally they are chemicals that pose a significant acute or chronic risk to the environment or people. This target calls for the risks posed by pesticides and such chemicals to be reduced by half.
Integrated pest management – Integrated pest management is an ecosystem approach to crop production and protection that combines different management strategies and practices to grow healthy crops and minimize the use of pesticides.

Taking into account food security and livelihoods – Nutrients and pesticides are important inputs in many agricultural systems. Any actions to reduce the impacts of pollution from these sources should consider possible impacts on food security and livelihoods. Actions towards this target should be a part of wider sustainable agriculture and food systems transitions; include safeguards to achieve food security; and should not compete with priorities of farmers and those who rely on agri-food systems for their livelihoods, including small-holders, and indigenous peoples and local communities.

Preventing, reducing, and working towards eliminating plastic pollution – Plastic pollution is accumulating across terrestrial, freshwater and marine ecosystems, with microplastics entering food chains and circulating in the atmosphere. It is increasingly regarded as an important type of pollution with significant impacts on biodiversity

Guiding Questions for National Target

Which ecosystems are being affected by pollution? Which pollutants are they being affected by? How are they affecting biodiversity and ecosystem functioning?
What are the main sources of pollution in the country? What are the point sources of pollution? What are the non-point sources?
Which pollution control measures are already in place in the country? How effective have these been? How could their effectiveness be improved?
What are the main channels or opportunities for reducing pollution risks? What type of actions could be used? What programmes or initiatives could be further built on?
What are the potential ecological, economic, and social opportunities and constraints in taking actions towards this target? 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 possible sources?

TARGET 7: **Summary and relation to EWR:**

Pollution refers to contaminants that are introduced to the environment, resulting in instability or harm. Pollution can take numerous forms as a variety of chemical compounds, types of light and sound, and products can cause environmental damage depending on their properties and concentrations. All sources of pollution should be considered when taking action towards this target.

Excess nutrients, especially nitrogen and phosphorus, is a globally significant type of pollution with impacts on biodiversity. For example as nitrogen and phosphorus are often limiting nutrients in ecosystems, when they are present in excessive quantities they can result in rapid plant growth or algal blooms in marine ecosystems, which can alter ecosystem composition and function.

Plastic pollution is accumulating across terrestrial, freshwater and marine ecosystems, with microplastics entering food chains and circulating in the atmosphere. It is increasingly regarded as an important type of pollution with significant impacts on biodiversity.

SOURCE UNAVAILABLE

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

After construction, risks include: Loss of nutrients from existing soil; Pest poisons; Weed pesticides; Litter; Clogging of water course by litter; Overflow contaminating water course; Drainage contaminating water course; Plastic and tin pollution; Takeaway food wrappers; and, Heavy footfall and vehicular presence risks and light and noise pollution devaluing remaining habitat value.

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

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

Minimize the impact of climate change and ocean acidification on biodiversity and increase its resilience through mitigation, adaptation, and disaster risk reduction actions, including through nature-based solutions and/or ecosystem-based approaches, while minimizing negative and fostering positive impacts of climate action on biodiversity.

Importance

Climate change is one of the main direct drivers of biodiversity loss. In addition to climate change, rising atmospheric carbon dioxide concentrations have also resulted in ocean acidification. Various mitigation, adaptation and disaster risk reduction measures, including nature-based solutions and/or ecosystem-based approaches, have the potential to increase the resilience of ecosystems and human livelihoods to the impacts of climate change, including reducing emissions from deforestation and other land-use changes, and by enhancing carbon sinks. These approaches can also deliver numerous social, economic and environmental co-benefits.

Explanation

This target focuses on (a) minimizing the impacts of climate change and ocean acidification on biodiversity, (b) the contribution of biodiversity, through nature-based solutions or ecosystem based approaches, to climate mitigation and adaptation and disaster risk reduction and (c) minimizing negative and fostering positive impacts of climate action on biodiversity This target contains a number of specific elements:

Minimize the impact of climate change and ocean acidification on biodiversity and increase its resilience - This requires action to reduce greenhouse gas emissions, which may include nature-based solutions and ecosystem based approaches (see below) as well as considerations such as the siting of protected and conserved areas and species recovery programmes to take into account climate change.

Nature-based solutions – Refer to 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 including on mitigation, adaptation and disaster risk reduction.

Ecosystem-based approaches – Refer to the use of biodiversity and ecosystem services as part of an overall strategy to help address the adverse effects of climate change. Ecosystem-based mitigation refers to the use of ecosystems for their carbon storage and sequestration service to aid climate change mitigation. Ecosystem-based adaptation aims to maintain and increase the resilience and reduce the vulnerability of ecosystems and people in the face of the adverse effects of climate change. Such approaches can include sustainable management, conservation and restoration of ecosystems, as part of an overall adaptation strategy that takes into account the multiple social, economic and

cultural co-benefits for local communities. Ecosystem-based disaster risk reduction is the sustainable management, conservation and restoration of ecosystems to reduce disaster risk, with the aim of achieving sustainable and resilient development.

Minimizing negative and fostering positive impacts of climate action on biodiversity – While efforts and activities to address climate change could have the potential to generate significant positive impacts on biodiversity and those dependent on it, they could also unintentionally result in negative impacts if they are not appropriately designed and implemented. Taking into consideration biodiversity when designing, implementing and monitoring climate change adaptation and mitigation activities, can deliver not only multiple benefits, but also contribute to avoiding negative impacts of the activities on biodiversity and ecosystems.

Guiding Questions For National Target Setting

Which ecosystems in the country are vulnerable to climate change or ocean acidification? Which areas are particularly important for biodiversity, ecosystem services and human well-being?

What measures are currently being taken to minimize the impact of climate change and ocean acidification on biodiversity? How do these account for mitigation, adaption and disaster risk reduction, including through nature-based solutions and/or ecosystem-based approaches? How do these minimize negative and promote positive impacts for biodiversity? How effective have these been? How could their effectiveness be improved?

Who are the actors that may be affected by actions taken to reach this target? 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 possible sources for these resources?

TARGET 8: **Summary and relation to EWR**

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

Raising atmospheric carbon dioxide concentrations by encouraging driving together with the loss of existing habitat space is not compatible with minimizing the impacts of climate change but rather contributes to it. Minimizing impact of climate change upon biodiversity using ecosystem based approaches would consider alternatives to the destruction of EWR for the construction of a car park in view of alternatives (appropriate re-planning and re-design at architectural level and use of one car park less than planned) existing. (See: Part 7: *Alternatives*)

Meeting people's needs through sustainable use and benefit-sharing

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 cultural and economic activity.

See Part 5: (*Water, Drainage & Flooding*)

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 rational 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 based services and activities.

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 planning application papers can be analysed and responded to in a longer time frame 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.

Tools and solutions for implementation and mainstreaming

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 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.

> *"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.

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

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

Take legal, administrative or policy measures to encourage and enable business, and in particular to ensure that large and transnational companies and financial institutions:

(a) Regularly monitor, assess, and transparently disclose their risks, dependencies and impacts on biodiversity, including with requirements for all large as well as transnational companies and financial institutions along their operations, supply and value chains, and portfolios;

(b) Provide information needed to consumers to promote sustainable consumption patterns;

(c) Report on compliance with access and benefit-sharing regulations and measures, as applicable;

in order to progressively reduce negative impacts on biodiversity, increase positive impacts, reduce biodiversity-related risks to business and financial institutions, and promote actions to ensure sustainable patterns of production.

TARGET 15: Summary and relation to EWR

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

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

Ensure that people are **encouraged and enabled** to make sustainable consumption choices, including by **establishing supportive policy, legislative or regulatory frameworks, improving education and access to relevant and accurate information and alternatives,** and by 2030, reduce the global footprint of consumption in an equitable manner, including through halving global food waste, significantly reducing overconsumption and substantially reducing waste generation, in order for all people to live well in harmony with Mother Earth.

Consumption

Use of goods or of services. The term consumption has two different meanings, depending on context. As commonly used in regard to the Footprint, it refers to the use of goods or services. A consumed good or service embodies all the resources, ***including energy,*** *necessary to provide it to the consumer. In full life-cycle accounting, everything used along the production chain is taken into account, including any losses along the way. For example, consumed food includes not only the plant or animal matter people eat or waste in the household, but also that lost during processing or harvest, as well as all the energy used to grow, harvest, process and* ***transport*** *the food.*

https://www.footprintnetwork.org/resources/glossary/

TARGET 16: Summary and relation to EWR

In the case of the planned car park upon EWR, promoting public transport and the use of existing car parks and initiating park and ride schemes should be encouraged and enabled in order to satisfy this target commitment. The Convention of Biological Diversity signed by UK Government, states that the establishment of support policy, legislative or regulatory frameworks should improve access to alternatives leading to the reduction of global footprint by 2030. Only by local authority action leading the way according to and relating to local issues can the nation meet targets.

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

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

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

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

Identify by 2025, and eliminate, phase out or reform incentives, including subsidies, harmful for biodiversity, in a proportionate, just, fair, effective and equitable way, while substantially and progressively reducing them by at least $500 billion per year by 2030, starting with the most harmful incentives, and scale up positive incentives for the conservation and sustainable use of biodiversity.

Incentives
the opportunities and constraints that influence the behaviour of individuals and organisations in a society, deriving from a wide range of societal factors, including, but not limited to, measures taken by governments

Incentive measures
"…economically and socially sound measures that act as incentives for the conservation and sustainable use of components of biological diversity." (Article 11 CBD) A specific inducement designed and implemented to individuals to conserve biological diversity or to use its components in a sustainable manner

Incentives harmful for biodiversity (or 'perverse' incentives)
emanate from policies or practices that induce unsustainable behavior that is harmful to biodiversity, often as unanticipated (and unintended of policies designed to attain other objectives

What are incentives harmful for biodiversity? Examples

A land use policy prescribes "productive" use of land.
May discourage sustainable use practices or private conservation

A programme assigns strict protection status to wildlife living adjacent to agricultural communities.
"Shoot, shovel, and shut up" of nuisance wildlife

A rat extermination programme pays people per rat pelt handed in.
People may start farming rats! (Vann 2003)

A rural development programme provides subsidized chemical fertilizer to farmers.
May lead to fertilizer overuse and/or discourage other, more sustainable methods to improve soil quality

Government discusses introduction of a payment programme for farmers who adopt more sustainable agricultural practices.
Farmers may increase their use of harmful practices so as to enhance their eligibility for receiving payments

What to do?

"…urges Parties and other Governments to prioritize and significantly increase their efforts in actively identifying , eliminating phasing out , or reforming , with a view to , minimizing or avoiding negative impacts from, existing harmful incentives for sectors that can potentially affect biodiversity,…" COP-10, decision X/44, paragraph 9

Addressing incentives that are harmful for biodiversity
Markus Lehmann, CBD Secretariat

Article 11 of the Convention on Biological Diversity, on incentive measures, creates an obligation for Contracting Parties to, "as far as possible and as appropriate, adopt economically and socially sound measures that act as incentives for the conservation and sustainable use of biological diversity."

Incentives that are harmful for biodiversity (or, as they also have been called under the Convention in the past, 'perverse' incentives) emanate from policies or practices that induce unsustainable behaviour that destroys biodiversity, often as unanticipated side-effects of policies designed to attain other objectives.

Perverse incentives are frequently the un-anticipated result of policies with well-intentioned objectives — for instance, 'beneficial-use' laws, as discussed above, seek to promote the productive use of land as a contribution to economic development. In order to avoid adverse effects on biodiversity and ecosystem services, assessments should be undertaken to analyse the implications of new, proposed policies prior to their implementation (for instance in form of strategic impact assessment).

(d) Improved data and analysis are needed, including more comprehensive assessments on the complex interactions between different programmes and policies. Such assessments can indicate where reforming perverse incentives can remove price distortions that cause overuse of biodiversity or conversion of nature beyond the socially optimal level. This can release funds for positive incentives, or simply alleviate the need for a positive incentive;

(e) Improved communication and coordination among policy/decision-makers, as well as between policy/ decision-makers and relevant stakeholders, should showcase the potential benefits of identifying and removing or mitigating perverse incentives, and/or should ensure coherent implementation of reforms at governmental levels.

Incentive measures for the conservation and sustainable use of biological diversity / CBD

With the recent advent of programmes implementing payments for ecosystem services (PES schemes), direct incentive measures are increasingly applied in both developed and developing countries, in the latter case frequently with the support of multilateral and bilateral donor organizations. Such direct approaches typically involve the acquisition, based on a voluntary programme offered by private or public actors, of certain or all use and development rights of an area in exchange for a payment, which is in many cases monetary but sometimes also in-kind (see the cases from Ecuador and Japan in section IV).10

Advises:
Economic instruments (taxes or user fees), possibly coupled with the establishment of earmarked funds, can play an important role in adjusting price signals to appropriate levels and as a source of revenue for ecosystem management, including the funding of positive incentive measures. However, economic instruments are in some cases set too low to effectively change behaviour or to meet financial requirements for resource management. The calibration of economic instruments needs to be improved, both in developing and developed countries, to ensure that prices reflect a resource's full economic value and the social costs of resource and ecosystem degradation.

Conclusions and consolidated lessons learned

1. There is a wide range of positive incentive measures available and applied to encourage the conservation and sustainable use of biodiversity. They need to be applied in a flexible manner and tailored to **local conditions**. One size does not fit all.

2. The measures need to be well targeted. Particular attention needs to be given to defining clear terms of reference including objectives, measurable targets, associated indicators as well as baseline standards or benchmarks for eligibility for the incentive provided. Clear rules and criteria reduce the risk of unexpected reactions by target actors of the programme, with possibly adverse consequences for biodiversity and ecosystem services.

3. Assessing the economic value of biodiversity and ecosystem services, and complementing existing national accounts to reflect depreciation of natural capital, can play an important role in better calibrating economic instruments and positive incentive measures for the conservation and sustainable use of biodiversity.

4. The provision of positive incentive measures, whether monetary or not, requires adequate funding. Economic instruments (taxes and/or charges/fees) need to be calibrated carefully so that they can play their role, whenever planned, as a source of revenue for funding the provision of positive incentive measures, while not generating too strong incentives for evasion and illegal resource exploitation. In any case, the effective monitoring of resource extraction operations remains essential even when incentives for sustain-

able management are provided. Adequate levels of resources are also required to set up effective monitoring systems.

5. A long-term commitment to provide positive incentives is important. Securing long-term financial sustainability of positive incentives is critical, since positive effects on biodiversity will require time to take effect and since maintaining these positive effects requires the continuation of policies that encourage environmentally sustainable behaviour.

6. Positive incentive measures are typically complex undertakings, and not necessarily only for financial reasons. They typically involve the building of institutions and trust. The different mandates and interests, and subsequent dynamics, for instance among and between government representatives and stakeholders, must be taken into account.

7. The important relationship between the provision of positive incentives and the removal of perverse incentives must be taken into account. The prior removal of perverse incentives will make positive incentives more effective, and can even reduce the need for providing positive incentives.

8. Designers of positive incentive measures need to understand the life-choices of the target groups. If the design of positive incentives does not reflect a sufficient understanding of communities and their relationship with the resources, they run the risk of not achieving their goals and harming already sensitive bonds of trust between communities and formal institutions.

9. Gender issues need to be taken fully into account when designing and implementing positive incentive measures, for instance, the impact of community forestry programmes on rural and forest-dwelling women, through the redistribution of forest resources.

10. In some cases, incentives in kind are more acceptable than cash payments as the perception of a sale of a good or service is avoided. Community or society recognition, for instance by environmental awards, and the raising of awareness of the value of biodiversity and ecosystem services can act as important incentives in their own right.

11. The incentive provided must ensure no loss of income, as there would be no incentive for behavioural change otherwise and as this could also impact the trust built between actors. More generally, equity considerations need to be taken into account, since poverty and widespread inequality often impede biodiversity conservation. In particular, there is a need to recognize that measures such as payments for ecosystem services are not poverty alleviation tools and synergies with social objectives are not automatic. Poverty alleviation measures may, however, generate additional benefits for biodiversity conservation and sustainable use.

12. Some positive incentive measures, such as payments for ecosystem services, can generate additionally issues and leakage, which must be taken into account at the design stage to ensure that they are cost-efficient and effective.Case studies and lessons learned

13. Positive incentive measures can generate perverse effects when not properly designed and implemented. Understanding the relationship between perverse and positive incentives is also important in this context. Applying the guidance developed by UNEP can be useful in this regard (see above).

14. For these reasons, effective monitoring and regular review of incentive measures is essential. Measures should be reviewed regularly to ensure that they have generated the intended impacts in a cost-effective manner and within a reasonable amount of time.

15. Many positive incentive measures are based on the active involvement of traditional or local communities, particularly in the context of community-based natural resource management. In these cases:
(a) Community participation needs to start early and be a long-term commitment. This ensures that incentives can be monitored for effectiveness and that the programme gains credibility;
(b) Inputs, whether monetary or non-monetary, have to be sustained to gain the trust and confidence of local people and build credibility;
(c) Benefits do not necessarily need to be monetary — they must be tangible, tailored and appropriately scaled, to maintain stakeholder enthusiasm and to ensure communities to remain committed to the projects;
(d) **The responsibility of local people as traditional resource managers must be acknowledged and used, as these communities often have a deeper understanding of how to maintain biodiversity and use it in a sustainable manner;**
(e) The devolution of power can pose practical challenges. Local participatory decision-making institutions can be fragile and external safeguards to maintain good governance and adequate capacity may be required, as well as possibly continuing external support;
(f) Sustaining the effectiveness of co-management institutions and mechanisms in a high-growth environment, resulting in an ever-increasing pressure on the resource, can amount to a considerable challenge.

16. Capacity is frequently an important bottleneck in designing and implementing effective measures, and it is therefore important to enhance capacity in, and provide training for, the design and implementation of positive incentive measures. Recent efforts to expand university curricula on environmental economics and to build regional programmes and networks should be replicated and broadened.

Incentive measures for the conservation and sustainable use of biological diversity / CBD

TARGET 18: Summary and relation to EWR

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

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

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

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

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

Arising 'perverse incentives' might include, for example, a response from the applicant to the ideas contained within this document, attempting to offer the installation of community growing plots elsewhere on-site (or off-site) in order to gain positive outcome in decision making in regard to establishing a car park upon EWR.

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

> Ensure the full, equitable, inclusive, effective and gender-responsive representation and participation in decision-making, and access to justice and information related to biodiversity by indigenous peoples and **local communities**, respecting their cultures and their rights over lands, territories, resources, and traditional knowledge, as well as by women and girls, children and youth, and persons with disabilities and ensure the full protection of environmental human rights defenders.

TARGET 22: Summary and relation to EWR

Ensure the full, equitable, inclusive, effective and gender-responsive representation and participation in decision-making, and access to justice and information related to biodiversity by indigenous peoples and **local communities**, respecting their cultures and their rights over lands, territories, resources, and traditional knowledge, as well as by women and girls, children and youth, and persons with disabilities and ensure the full protection of environmental human rights defenders.

3.1.2.c. **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.

> ***PART 1, CHAPTER 1, Environmental targets, Section 1,***
> *Environmental Targets*
>
> *(3)The priority areas are —*
>
> ***a) air quality***
> ***b) water***
> ***c) biodiversity***
> *d) resource efficiency and waste reduction*

Air quality and water are key elements for decision makers to consider in regard for the outline part of the application to build a car park upon EWR. Arguments concerned with those elements (arguments of objection) cross-over with the subject of biodiversity but are covered in separate sections of this document. See Part 5: (*Water, Drainage & Flooding).*

> ***PART 1, CHAPTER 1, Environmental targets, Section 1,***
> *Environmental targets: **species abundance***
>
> *(1)The Secretary of State must by regulations set a target (the "species abundance target") in respect of a matter relating to the abundance of species.*
>
> *(2)The specified date for the species abundance target must be 31 December 2030.*
>
> *(3)Accordingly, the species abundance target is not a long-term target and the duty in subsection (1) is in addition to (and does not discharge) the duty in section 1(2) to set a long-term target in relation to biodiversity.*
>
> *(4)Before making regulations under subsection (1) which set or amend a target the Secretary of State must be satisfied that meeting the target, or the amended target, would halt a decline in the abundance of species.*
>
> *(5)Section 1(4) to (9) applies to the species abundance target and to regulations under this section as it applies to targets set under section 1 and to regulations under that section.*
>
> *(6)In this Part "the species abundance target" means the target set under subsection*

The UK is taking the decline of species abundance seriously. The state of decline in UK species abundancy is covered in more detail in section 3.0 of this document (*Biodiversity & Ecology / State of Nature Report*).

The decline in abundance of our wildlife is accelerating. Numbers of birds alone are 43% less than they were 50 years ago. The number of birds has almost halved in FIFTY YEARS.

Even comprehending this, after, 3,500 + years of British occupation since the Copper Age, is monumental. Now that the situation is recognised nationally (as well as globally) it is equally difficult to comprehend the lack of designation of such sites as EWR at local level.

Only by starting at local levels can anything change. Already an existing refuge locally, with enhancement, EWR as it is now, offers real potential in contributing toward stemming species abundance decline s nationally.

> ***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 to be treated (by government at all levels) as an environmental improvement plan. This plan is examined in detail in the next section (Page 64).

> ***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.

3.1.2.d. **Recovering Nature: Our 25 Year Plan to Improve the Environment**

According to *'The Environment Act 2021'*, *'Our 25 Year Plan to Improve the Environment'* published by Her Majesty's Government on 11 January 2018, is to be treated as an environmental improvement plan prepared by the Secretary of State under Section 1.

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

> *This 25 Year Environment Plan sets out government action to help the natural world regain and retain good health. It aims to deliver cleaner air and water in our cities and rural landscapes, protect threatened species and provide* ***richer wildlife habitats.*** *It calls for an approach to agriculture, forestry,* ***land use*** *and fishing that* ***puts the environment first.***
>
> *Respecting* ***nature's intrinsic value****, and the value of all life, is critical to our mission. For this reason we safeguard cherished landscapes* ***from economic exploitation****,* ***protect the welfare of sentient animals and strive to preserve endangered woodland and plant life****, not to mention the greening of our urban environments*
>
> **RN: 25yr PLAN , p6**
>
> *This 25 Year Environment Plan sets out government action to help the natural world regain and retain good health. It aims to deliver cleaner air and water in our cities and rural landscapes, protect threatened species and* ***provide richer wildlife habitats.*** *It calls for an approach to agriculture, forestry, land use and fishing that* ***puts the environment first.***
>
> **RN: 25yr PLAN , p9**

A New Approach to Managing the Environment

> *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-breaking 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 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'.

Industrial Strategy and the 25 Year Environment Plan

> *Our Industrial Strategy, published in November 2017, and our 25 Year Environment Plan set out our approach to safeguarding our environment and future-proofing our economy for generations to come. They are complementary approaches that reinforce one another given the relationship between the environment and the economy.*
>
> **RN, 25 yr plan**

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

- Clean Growth – maximising the advantages of UK industry from the global shift to clean growth.

- Future of Mobility – becoming a world leader in the way people, goods and services move.

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

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

RN, 25 yr plan, p19

<u>What is Natural Capital</u>

Natural capital is the sum of our ecosystems, species, freshwater, land, soils, minerals, our air and our seas. These are all elements of nature that either directly or indirectly bring value to people and the country at large. They do this in many ways but chiefly by providing us with food, clean air and water, wildlife, energy, wood, recreation and protection from hazards.

RN, 25 yr plan, p19

A natural capital approach is equally relevant for those making decisions involving the use of significant public funds. Over the next 25 years, our policy choices will be better-informed with a natural capital approach. Not all aspects of natural capital – the contribution of wildlife, for example – can be robustly valued at present and we do not always need to know a monetary value to know that something is worth protecting.

RN, 25 yr plan, p20

We will work with all parts of society and all sectors of the economy as we implement the 25 Year Environment Plan to leave the environment in a better state than we found it. We will invite bodies and people to reduce the environmental impact of their actions, and do more to help communities and individuals to engage with nature and enhance what they find there.

RN, 25 yr plan, p22

Goals of the 25 Year Plan

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

Evidence for clean air is well documented and can be, arguably, mitigated. A question that does arise is whether BNG mitigation calculations adequately consider vehicle use (omissions) and **added attraction of an increase of vehicles** (and resulting vehicle use and omissions) related to the land being mitigated. Goal #1 (clean Air) should consider not only a tree for tree plus 10% mitigation (added because many trees planted in mitigation will die, *etc*) but should include calculations based upon increased pollution by increased vehicle use and **attractio**n.

Water, Drainage & Flooding is discussed in another part of this document. With Britain's water infrastructure currently in dire straights, clean and plentiful water is of paramount concern. A rivulet (now piped underground) sourced by natural fine sand springs runs through EWR. This is a valuable natural asset and has been ignored. This rivulet becomes open to the air at the boundary with Sykes Reservoir #1 after being joined by run-off from the railway premises. The rivulet is integral to the function of the reservoir system, potentially also to relieving flooding issues connected with the water table in the area. The rivulet continues westward, entering the wider river system.

Thriving plants and wildlife already exist in EWR and there is scope (pursuant to legally binding commitments) to enhance it. Removing their home will devastate local ecology in EWR itself and will greatly effect the ecology of the neighbouring reservoirs. Locally, the life currently situated in EWR CANNOT be replaced. There is nowhere of equal size left in Edgeley to replace it. If there was, it would take thirty years to achieve anything remotely similar in regard to undergrowth and younger trees and upwards of fifty years to achieve anything similar in regard to maturer trees, microbial life, lichens, mosses, insect life and the combined system of their sum totals.

Policies

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. Designating EWR as an urban nature reserve will contribute to the recovery of nature and enhance the local area. The idea for a gated nature reserve upon EWR will connect people with the environment to improve health and wellbeing (see Part 4: *Community, Health & Education*).

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

Britain's wildlife cannot begin to recover from it's shocking decline in abundance and 'thrive' where there is nowhere left to 'thrive'.

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

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.

*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 scub 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 pages 15 to 59, government is committed to taking action toward establishing the following policy:

- Developing a Nature Recovery Network to **protect and restore wildlife**, and **provide opportunities to re-introduce species** that we have lost from our countryside.

RN: 25yr PLAN , p56

We will support nature's recovery and restore losses suffered over the past 50 years. We will develop a strategy for nature to tackle biodiversity loss, develop a Nature Recovery Network to complement and connect our best wildlife sites, and provide opportunities for species conservation and the reintroduction of native species. We will also explore introducing conservation covenants. These actions will help us create a healthier and richer natural environment.

RN: 25yr PLAN , p57

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 15 to 59, 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 un designated 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. (See Part 4: *Community, Health & Education*).

3.1.2.e. **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 wide scale 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.

> *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 NEA also showed that* ***nature is consistently undervalued in decision-making*** *and that many of the services we get from nature are in decline … Our challenge is to* ***halt this decline*** *– for the benefit of this and future generations.*
>
> *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**

<u>Aims</u>

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.

> *The independent review of England's wildlife sites and ecological network, chaired by Professor Sir John Lawton, concluded that England's collection of wildlife areas (both legally pro-*

tected areas and others) does not currently represent a coherent and resilient ecological network capable of responding to the challenges of climate change and other pressures.

*Effectively establishing coherent and resilient ecological networks on land and at sea requires a shift in emphasis, **away from piecemeal conservation actions** and towards a more effective, more integrated, landscape-scale approach.*

Biodiversity 2020, p5

*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

<u>Ambition</u>

We have developed ambitious yet achievable goals for 2020 and 2050 – intended to provide better, more, bigger and joined sites for nature, as recommended by the Making Space for Nature review, to enable us to halt overall biodiversity loss.

Biodiversity 2020, p11

The aims detailed in this government document draw upon international targets and agreements made as part of the Convention on Biological Diversity strategic plan. Achieving these outcomes will require **a co-ordinated set of actions** – many of which will deliver for more than one outcome.

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.

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.
>
> **Biodiversity 2020, p6**

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.

Delivering the Strategy and Measuring Progress

We will enable partnerships of local authorities, local communities and land managers, the private sector and conservation organisations to establish **new Nature Improvement Areas (NIAs),** based on a local assessment of opportunities for restoring and connecting nature on a **significant scale.**

We will encourage **local authorities to take a more active and positive role** in the management of [other non-NIA] Local Sites, including through reporting data on such sites in the Government's new Single Data List.

We will work with transport agencies and key delivery partners to create coherent and resilient ecological networks in the natural areas at the edges of our strategic roads and railways, which cover approximately 60,000 hectares.

Biodiversity 2020, p20

Nature Improvement Areas (NIAs): about the programme

Nature Improvement Areas (NIA) were established to create joined up and resilient ecological networks at a landscape scale. The 12 NIA projects started on 1 April 2012 and the funding ended on 31 March 2015. Nature Improvement Areas are large (in the region of 10,000-50,000 hectares), discrete areas that, by taking a landscape–scale approach, will deliver a step change in nature conservation, where a local partnership has a shared vision for their natural environment.
They are run by partnerships of local authorities, local communities and landowners, the private sector and conservation organisations with funding provided by the Department for the Environment, Food and Rural Affairs (Defra) and Natural England.

Many of the qualities identified which allow the designation of NIAs on a landscape scale are applicable to EWR on a local scale. This indicates that EWR is indeed an area which is viable for consideration by local government as an area of natural habitat potential in regard to its ecological value in its own right. Those aspects are:

- Opportunities to establish and improve ecological networks by enlarging, enhancing and connecting existing wildlife sites and **creating new sites.**
- **A shared vision for the natural environment** among a wide partnership of local people, including statutory and voluntary sectors. (See Part 4: *Community, Health & Education*)

- Benefits to urban areas and communities, with, where appropriate, ecological networks extending into urban areas

- 'Win-win' opportunities that offer multiple benefits, such as for:
  the water environment and Water Framework Directive objectives
  the low-carbon economy. (See Part 5: *Water, Drainage & Flooding*)

- Opportunities to inspire people through an enhanced experience of the natural environment. (See Part 4: *Community, Health & Education)*

- Core areas, especially existing wildlife sites (*eg.* national nature reserves, sites of special scientific interest, local nature reserves). See **3.1.3.i**. (Consideration of EWR as a Wildlife Reserve)

- Habitat corridors and 'stepping stones' to allow species to move around the area. (See page 137 - *Green Corridors*)

How EWR can Meet the Aims, Ambitions and Priorities of *Biodiversity 2020*:

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.

Being situated adjacent to a green link existing on railway premises extending to the wider area (including to a site with the potential to be restored as a large core natural habitat area in Adswood) and the proximity to a reservoir, provides option for local government to examine a greater widespread ecosystem network according to the principles set out in creating NIAs.

Other, more local based, ecological initiatives can also be examined which will meet many of the same criteria that NIAs are based upon.

Priority habitats can be created and priority species can be introduced once designated and managed habitats are protected, restored and established. EWR could, for example, be an adoption site for introducing butterflies, dragonflies, great crested newts, encouraging red-listed species such as birds and bats as well as a range of flora and vegetation.

3.1.2.f. **UK National Biodiversity Strategy and Action Plan (NBSAP)**

The UK's National Biodiversity Strategy and Action Plan (UK BAP)

The UK Biodiversity Action Plan (UK BAP) was published in 1994, and was the UK Government's response to the Convention on Biological Diversity (CBD), which the UK signed up to in 1992 in Rio de Janeiro. The CBD called for the development and enforcement of national strategies and associated action plans to **identify, conserve and protect existing** biological diversity, and to enhance it wherever possible.

In 2024 a new *UK Biodiversity Framework* was published, following agreement of the Kunming-Montreal Global Biodiversity Framework (GBF) in December 2022. A key task set out in the framework was the production of the UK's National Biodiversity Strategy and Action Plan (NBSAP) to summarise targets and actions across the UK to meet the GBF.

Joint Nature Conservation Committee

Following COP15, the UK government set an aim to publish its National Biodiversity Strategy and Action Plan by May 2024, together with the devolved administrations, before COP16 in Colombia in October. However, the UK's action plan had not been submitted at the time of writing. In May 2024, in a debate on biodiversity loss in Parliament Caroline Lucas (Green) raised concerns that the UK's submission would be the existing Environmental Improvement Plan instead of a bespoke document.

The new Labour government has set **nature recovery as one of the five priorities** for the Department for Environment, Food and Rural Affairs (Defra). It has also stated that it intends to **honour international agreements on biodiversity** and that it will update the current Environmental Improvement Plan.

https://commonslibrary.parliament.uk/biodiversity-loss-uk-international-obligations/

UK Biodiversity Framework

In 2024 a new UK Biodiversity Framework was published, following agreement of the Kunming-Montreal Global Biodiversity Framework (GBF) in December 2022. A key task set out in the framework was the production of the *UK's National Biodiversity Strategy and Action Plan (NBSAP)* to summarise targets and actions across the UK to meet the GBF

Joint Nature Conservation Committee

Commitments

The UK is **committed to taking positive action** and is party to Multilateral Environmental Agreements such as the Convention on Biological Diversity (CBD), the United Nations Framework Convention on Climate Change (UNFCCC), and the Convention on International Trade in Endangered Species (CITES). The KunmingMontreal Global Biodiversity Framework (GBF), agreed at the CBD's Fifteenth (15th) Conference of the Parties (COP 15) sets out its purpose as 'aiming to catalyze, enable and galvanize urgent and transformative action by Governments, and subnational and **local authorities,** with the involvement of all of society, to **halt and reverse biodiversity loss**, to achieve the outcomes it sets out in its Vision, **Mission, Goals and Targets**…' (Convention on Biological Diversity 2022).

The Environment Act 2021 builds on existing legislation and strategies to provide a legislative basis for nature recovery as well as wider environmental priorities and governance. This includes giving powers to the Secretary of State to set long-term, legally binding targets, for priority areas including biodiversity, together with a range of other measures to achieve nature recovery. In December 2022 world-leading legally binding targets were published including a target to halt the decline in species' abundance by 2030 with a target to reverse that decline, alongside a further target to reduce the risk of species' extinction. This was supported by a target to restore or create more than 500,000 hectares of wildlife-rich habitat, which will also help the UK to meet its international commitment to protect 30% of its land and ocean by 2030. The Act requires the creation of 'Environmental Improvement Plans' (EIPs). The 25 Year Environment Plan (25YEP) is considered the first such plan and was refreshed in 2023 to form the subsequent EIP (Department for Environment, Food and Rural Affairs 2023). The 25YEP committed to publishing a strategy for nature to replace England's previous strategy, Biodiversity 2020, and to implement new commitments under the GBF. The EIP 2023 sets out these plans and actions.

JNCC on behalf of the Four Countries' Biodiversity Group (4CBG). 2024. UK Biodiversity Framework. JNCC, Peterborough. https://hub.jncc.gov.uk/assets/19a729f6-440e-4ac6-8894-cc72e84cc3bb.

The Kunming-Montreal Global Biodiversity Framework (GBF)

This package includes a monitoring framework for the GBF, an enhanced mechanism for planning, monitoring, reporting and reviewing implementation, the necessary financial resources for implementation, strategic frameworks for capacity development and technical and scientific cooperation, as well as an agreement on digital sequence information on genetic resources.

Missions

Currently pursuant with legally binding commitments to the CBD (See **3.1.2.** Page 12) and The *Kunming-Montreal Global Biodiversity Framework* (GBF)

Goals

Currently pursuant with legally binding commitments to the CBD (See **3.1.2.** Page 12) and The *Kunming-Montreal Global Biodiversity Framework* (GBF)

Targets

Currently pursuant with legally binding commitments to the CBD (See **3.1.2.** Page 12) and The *Kunming-Montreal Global Biodiversity Framework* (GBF)

3.1.3. Commitments - Greater Manchester

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.

3.1.3.a. **Edinburgh Declaration on post-2020 global biodiversity framework**

> *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**

The Edinburgh Declaration argues for greater prominence to be given to the role of cities and local authorities in delivering the changes required. Greater Manchester Combined Authority has recognised:

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

Avoiding and minimising impacts upon wildlife habitat (especially where alternatives to planned developments can be effected) are options which local authorities within Greater Manchester are obliged to consider, and should, really, if they want to make any difference at all, be leaning toward.

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 biodiversiy 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.

3.1.3.b. **The Greater Manchester Local Wildlife Recovery Strategy - March 2024**

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

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

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 Combine 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.

Questions:

Have DEFRA and the Environment Agency been approached to map this land according to variables covered in this document? Notably the historically recorded spring water stream and its ecological connection to the local reservoirs and the wider river system?

Have GMEU been approached to survey this land according to variables covered in this document? Notably the historically recorded spring water stream and its ecological connection to the local reservoirs and the wider river system and the three identified habitats it is comprised of, two of them being principal habitat?

Has a local S*tate of Nature Report* been commissioned in order to ascertain the abundance of wildlife habitat in Edgeley?

3.1.3.c. **The Greater Manchester Biodiversity Action Plan 2009**

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

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

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

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

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

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

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

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

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

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

EWR should be entered into the GM BAP and/or The Local Nature Recovery Strategy in order to contribute to the recovery of Britain's wildlife and the conservation of wildlife habitat. Based upon its ranking according to the number and quality of the range of natural wildlife habitat sites/areas in the locality it should also be registered into relevant strategies concerned with local community access to natural green spaces for purposes of health and wellbeing.

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

Note: The *Local Nature Recovery Strategy* will replace GMBAP in 2025

3.1.3.d. **Areas Considered to be of Conservation Concern Locally**

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

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

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

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

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

Being the only area in Edgeley capable of securely sustaining wildlife to any meaningful degree, EWR is certainly an area which is of conservation concern locally. A thorough survey should examine it over four seasons and not fail to understand its current importance and potential in regard to local species abundance. The length of time and establishment of its reclamation by nature (its re-wildling) 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.

3.1.4. Commitments - Stockport

3.1.4.a. **Complying With Biodiversity Duty - Local Government**

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.

This means that, as a public authority, you must:

- Consider what you can do to **conserve and enhance** biodiversity.
- Agree **policies and specific objectives** based on your consideration.
- Act to deliver your policies and achieve your objectives

Who must comply with the bio-diversity duty

You must meet the biodiversity duty if you are a **public authority**, such as a:

- **government department** or public body
- **local authority or local planning authority**
- statutory undertaker – a business that has public authority duties for their land and delivers something of public importance

When to meet your biodiversity duty

You must complete your first consideration of what action to take for biodiversity by 1 January 2024. You must agree your policies and objectives as soon as possible after this.

You must reconsider the actions you can take within 5 years of when you complete your previous consideration.

You can decide to do this more often, for example, you could reconsider your actions quarterly, annually, or every 5 years.

Consider relevant strategies

You must check if these strategies will affect how your organisation complies with the biodiversity duty:

- **local nature recovery strategies**
- species conservation strategies
- protected site strategies

You must:

- understand how/if they are relevant to your organisation
- be aware of how these strategies affect land that you own or manage, or **actions you could take to conserve and enhance biodiversity**
- consider how you could **contribute to the strategy**, where appropriate

Local nature recovery strategies

These will be locally led strategies for nature and environmental improvement established by the Environment Act 2021. Each local nature recovery strategy will:

- agree priorities for nature's recovery
- map the most valuable existing areas for nature
- map specific proposals for creating or improving habitat for nature and wider environmental goals

There will be around 50 local nature recovery strategies covering the whole of England with no gaps or overlaps.

When the local nature recovery strategies are published, you will need to understand which ones are relevant to you and how you can contribute to them. These are likely to be the strategy, or strategies, for the areas in England you're active in.

Preparation of local nature recovery strategies is expected to begin across England from April 2023. You may want to consider how you could get involved in preparing and delivering them now. For example, you could contribute by acting on proposals to **create or improve habitat on land you own** or manage, or help someone else to do so. By

including any positive actions you plan to take in the strategy, you can help improve their quality. It will also make it easier for you to show how you have fulfilled your duty.

Guidance on how local planning authorities should consider local nature recovery strategies will be published when available.

Species conservation strategies

Established by the Environment Act 2021, species conservation strategies aim to safeguard the future of the species that are at greatest risk. The strategies will find better ways to comply with existing legal obligations to protect species at risk and to improve their conservation status.

Protected site strategies

Established by the Environment Act 2021, protected site strategies take a new approach to protecting and restoring species and habitats in protected sites. Protected site strategies will provide ways to overcome offsite pressures such as nutrient pollution in the wider catchment.

https://www.gov.uk/guidance/complying-with-the-biodiversity-duty#protected-site-strategies

How your biodiversity duty helps achieve biodiversity goals and targets

The action you take for biodiversity will contribute to the **achievement of national goals** and targets on biodiversity.

The Environmental Improvement Plan (EIP23), published in January 2023, sets out government plans for significantly improving the natural environment.

By 2030, the government has committed to:

- **halt the decline in species abundance**
- protect 30% of UK land

By 2042, the government has committed to:

- **increase species abundance** by at least 10% from 2030, surpassing 2022 levels
- **restore or create** at least 500,000 ha of a range of **wildlife rich habitats**

- reduce the risk of species extinction
- restore 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term

Actions you could take

The policies and objectives you set, and the action you take to achieve them, will depend on your functions as a public authority.

Public authorities can give priority to areas of high biodiversity value, if appropriate.

If you already have a strategy that monitors your environmental performance, you can include your biodiversity actions as part of this.

Consider creating a new document if you do not have a suitable existing strategy. In it, you can record the actions you plan to take to meet your biodiversity objectives.

As a core component of natural capital, **biodiversity supports ecosystem services that benefit people and the economy**. When thinking about what actions you could take as part of your duty, you could consider the value of taking a Natural Capital approach.

If your public authority is involved with development plans and decisions, **consider your biodiversity duty** when you're complying with requirements under:

- strategic environmental assessment
- environmental impact assessment (see xxx)
- **Habitats Regulations assessment**

https://www.gov.uk/guidance/complying-with-the-biodiversity-duty#actions-you-could-take

Manage land to improve biodiversity

Consider how the land you manage could improve biodiversity. This includes green and blue spaces like:

- allotments
- cemeteries
- parks and sports fields
- amenity spaces and communal gardens

- roadside and railway verges
- field margins and hedgerows
- rights of way and access routes
- woodlands and nature reserves
- canals and rivers
- water-dependent habitats
- estuaries and coastal habitats

Small changes to how you manage these areas could create habitats for wildlife and 'nature corridors' that connect existing habitats. This allows species to move between habitats, maintain or increase populations and be more resilient to climate change.

There are other things you can do to improve habitats, including:

- using native and sustainably sourced trees when planting
- creating dedicated spaces for wildlife
- leaving dead wood safely in place in woodlands to provide additional habitat
- maintaining planted trees to give them the best chance of survival
- reducing the use of herbicides, pesticides, peat and water
- implementing measures to prevent the spread of invasive species and plant disease

These actions can save money while delivering benefits to biodiversity.

If you own or manage large areas of land, consider promoting and encouraging nature-based solutions, restoration of natural processes and landscape recovery.

Natural England has published the Green Infrastructure Framework - Principles and Standards for England. This includes planning, design and process guides.

Make space for wildlife

You could create dedicated spaces to attract wildlife and enhance biodiversity. This is possible even if your public authority owns a single office building. It is important that these measures are appropriate to the location.

You could:

- build and install nest boxes for birds, bats and other animals
- add green walls or roofs to existing or new buildings

- plant native trees and shrubs
- plant wildflowers for pollinators

You can do more if you own or manage specific types of land. For example, if you own or manage:

- school grounds – create gardens, ponds, meadows or woodlands to improve biodiversity and aid education
- farmland – be aware of soil health, water use and waste management and encourage farmers to apply for agri-environment schemes and use pesticides appropriately.

Enhance protected sites

Sites that public authorities own or manage can be protected by other legislation. For example:

- sites of special scientific interest
- special areas of conservation or special protection areas
- national nature reserves
- local nature reserves and local sites
- Ramsar sites (wetlands of international importance)

You should already be helping to conserve and enhance biodiversity on this land. For example, public bodies already have a duty to take all reasonable steps to conserve and enhance sites of special scientific interest.

The Environmental Improvement Plan set the expectation that all public authorities should ensure they have management plans in place by the end of 2023 to support their sites to reach favourable status.

Authorities should produce those plans and work actively with Natural England and others to identify and implement the actions needed to improve site condition.

Reporting your biodiversity policies and actions

Some public authorities need to publish a biodiversity report.

Local authorities (excluding parish councils) and local planning authorities must write and publish a biodiversity report. Other public authorities must fulfil their duty, but do not need to publish a report.

For local authorities and local planning authorities, the end date of your first reporting period should be no later than 1 January 2026.

After this, the end date of each reporting period must be within 5 years of the end date of the previous reporting period.

The report is a chance to communicate how your organisation is helping to improve the environment and show the positive change you're making.

Defra intends to include references to your biodiversity reports in the 5-yearly reviews of the Environmental Improvement Plan.

Defra's reporting your biodiversity duty actions guidance gives information about when you must publish your report and what you need to include.

Your biodiversity reports will:

- help everyone understand how we are collectively meeting shared goals to conserve and enhance biodiversity
- allow you to showcase the action you're taking to improve biodiversity
- show other authorities and the general public what they can do for nature recovery and share good practice

Summary in relation to planning application

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.

3.1.4.b. **Stockport's Biodiversity Action Plan**

At the time of writing this document there is no local authority (Stockport) published dedicated biodiversity strategy or action plan to refer to other than the following statement found on the Stockport Council website.

> *Stockport has a wealth of parks and green spaces. They are great places for health and recreation, as well as being havens for wildlife and biodiversity.*
>
> *Biodiversity is all the different kinds of life you'll find in one area including wildlife, their habitats, and the connections between them. Biodiversity is declining because of:*

- *pollution*
- *intensive agriculture*
- *climate change*

For some reason, on the website, Stockport has omitted **urbanisation, development and landscape change,** agreed universally as a/the major driving force in declining biodiversity and declining species abundance.

The web page goes on:

> *It's more important than ever that our natural environment is protected and improved.*
>
> *In March 2019 we declared a climate emergency and developed a Climate Action Plan.*
>
> *There are lots of ways that you can help us to protect and increase biodiversity in Stockport:*

- *put up a wildlife box: birds and bats will readily nest/roost within manmade boxes. Remember to locate boxes away from predators such as cats. An insect box or bug house is a great way to help bees, butterflies and other invertebrates*
- *create a pond: ponds provide a home, or feeding site, for many wildlife species including amphibians, invertebrates and birds. Include shallow edges or a well-placed pile of stones/logs to allow creatures to access the pond. If you cannot create a pond, a bog garden is a good alternative and can be just as valuable to wildlife*
- *plant wildflowers: our native wildflowers are beautiful and are an important nectar source for bees, butterflies and other pollinator species. You could create a wildflower meadow area, or if space is limited, grow wildflowers in pots or a window box. Choose different wildflower species to try and have something in bloom from early spring through to late autumn*
- *plant trees and hedges: they offer shelter to many wildlife species and help link up habitats. Choose native species where possible, particularly those which produce fruits and berries, an important food source for many birds and mammals*

- *make wildlife gaps: link up habitats by making holes in the base, or underneath, garden fences and walls to allow wildlife, such as hedgehogs to pass through. A gap 13cm by 13cm is big enough for hedgehogs, but too small for most pets*
- *use peat free compost: peat is extracted from peat bogs. These are fragile habitats which take thousands of years to form. Use good quality peat free composts available, or make your own from garden waste*
- *help look after your local park or green space*
- *visit our local parks and green spaces and tell us what you see. It's important we build up a picture of wildlife across Stockport to help us protect it*

https://www.stockport.gov.uk/wildlife-and-biodiversity

Local Nature Recovery Group (LNRG)

In expectation of developing a local nature recovery strategy in accordance with national legislation, in 2023, Stockport set up LNRG.

No Local Nature Recovery Strategy has been published and no minutes from the group's meetings are available.

As already mentioned, no Stockport Biodiversity Action Plan has been published either.

Stockport has **no viable or publicly visible** Local Nature Recovery Strategy or Biodiversity Action Plan Currently, Stockport must fall back upon the Greater Manchester Biodiversity Action Plan (see **3.1.3.c**).

SMBC are duty bound to be

- agreeing priorities for nature's recovery
- mapping the most valuable existing areas for nature
- mapping **specific proposals for creating or improving habitat for nature** and wider environmental goals

Strategies for Stockport should include and begin with a count. An inventory should be made of areas which are potential wildlife habitats and areas with a lack of wildlife habitats. The inventory, in consideration of community benefits (ecoservices) that such natural habitats have the potential to provide, should note areas of Stockport which are particularly deprived of access to natural green-space / true wildlife habitat.

Following that, Stockport should examine the wider network and connectivity of existing designated and existing un designated sites capable of sustaining wildlife habitat with a view to protection, restoration and enhancement. By doing this, Stockport will be contributing toward legally bound targets and strategies which have been implemented at national levels and by Greater Manchester Combined Authority (GMCA).

Biodiversity – short for biological diversity – is in decline worldwide at an **unprecedented rate**, mainly due to urban development and climate change. Currently, 28 per cent of all species on Earth are threatened with extinction.

Stockport is not immune to these statistics. Nowhere is.

The council will not be able to make an informed decision on the outline part of this planning application (Ref: # DC/092211) without a working strategy subject to legally binding commitments on the subject of biodiversity.

The council will not be able to make an informed decision on the outline part of this planning application (Ref: # DC/092211) without an updated report on the state of nature in Stockport, or a count of wildlife habitat potential in Stockport subject to legally binding commitments on the subject of biodiversity.

This document by Edgeley Wildlife Reserve Group would like to bring to the attention of Stockport LNRG and SMBC in general, the existence of a viable site, the only such viable site in Edgeley, waiting for protection, restoration, and enhancement, according to the legally binding commitments explained in previous chapters of this document.

This site (viable as a local nature reserve) is under threat of development. The outline part of this planning application (Ref: # DC/092211) will remove the only existing such site permanently from the Edgeley community.

<u>The Local Plan</u>

Stockport's Local Plan is not a dedicated biodiversity strategy but a guideline for the development and management of Stockport in general. Edgeley Wildlife Reserve Group were told by a local councillor that *The Local Plan* is under draft. We were advised that we would have to wait for the new draft to be published as basing our representation, objections and suggestions (as a local community organisation) on the out-of-date existing plan would be inadequate.

Edgeley Wildlife Reserve Group have had three weeks to examine 140 plus documents relevant to the planning application in question, some of which consist of over 100 pages, and have been told that the existing Local Plan is useless in reference.

We have been informed and understand that (at the time of writing this document) Stockport Council are currently re-writing a new draft of *The Local Plan* and that the context of the new draft yet to be published will be the basis of direction for the council in making decisions on matters concerning development.

The council will not be able to make an informed decision on the outline part of this planning application (Ref: # DC/092211) without a working strategy subject to legally binding commitments on the subject of biodiversity.

The council will not be able to make an informed decision on the outline part of this planning application (Ref: # DC/092211) without an updated report on the state of nature in Stockport, or a count of sites of wildlife habitat potential in Stockport as subject to legally binding commitments on the subject of strategies, targets and goals to stem the decline of biodiversity.

Lack of Local Plan, Lack of Local Nature Recovery Strategy, Lack of Biodiversity Action Plan

How can the public (local communities) form opposition, objections, arguments, inform relevant bodies, or present points in representation of a biodiversity crisis without a valid publicly available reference, especially (as in this case) in view of time scales allowed for objections, with no active Biodiversity Action Plan to refer to?

How can the council grant a decision in the favour of the outline part of this planning application (Ref: # DC/092211) without a valid publicly available reference, especially (as in this case) in view of time scales allowed for objections, with no active Local Plan, Nature Recovery Strategy, or Biodiversity Action Plan to refer to.

Edgeley Wildlife Reserve Group, therefore, request a postponement to any decision regarding the outline part of the planning application (subject of this document) while Stockport's position (in regard to strategies to meet legally binding commitments and targets in relation to the declared biodiversity crisis) is reviewed and strategies are published.

3.1.4.c. **Stockport's Local Plan**

What is the local plan

We have a once in a generation opportunity as we develop our new Local Plan to make sure it is the right plan for Stockport, by Stockport.
Our Local Plan will set out the vision for future development in the borough. It will be used to help make decisions on planning applications and other planning related matters for the next 15 years. The plan is a guide to what can be built where.

The plan will help us achieve the vision of the *One Stockport One Future plan* and the *One Stockport Borough plan*, in which:

- the people of Stockport and their communities are at the heart of what we do
- Stockport is a great place to live, where no one is left behind
- Stockport is growing, creating and delivering a thriving future

https://www.stockport.gov.uk/about-the-stockport-local-plan/what-is-the-local-plan

Why we have the local plan

An up to date Local Plan will:

- make sure Stockport has the right land, homes and infrastructure in the right places, for current and future generations
- help address the key issues facing the borough such as the climate emergency
- identify those places and sites where change and development can best be accommodated
- **set out the factors we need to take into account when considering development proposals**
- **help us plan for development in a coordinated way whilst protecting what we value most in Stockport such as our environment, community and heritage assets**

If we do not have the right plan in place for Stockport, there could be risks to the council and our communities such as:

- a reduced ability to make sure we get the right development in the right places
- the potential for planning appeals where decisions about what is right for Stockport are taken out of our hands

- not being able to get contributions from developers towards improvements in the local area
- lack of certainty for both the public and private sectors
- reduced confidence in Stockport as a place to build new homes or invest in new businesses or services

The Stockport Local Plan is informed and shaped by:

- the National Planning Policy Framework (NPPF) and National Planning Practice Guidance
- One Stockport Borough plan
- One Stockport, One Future plan
- Neighbourhood Plans which are currently being developed by local communities across Stockport

https://www.stockport.gov.uk/about-the-stockport-local-plan/why-we-have-the-local-plan

3.1.4.d. **The National Planning Policy Framework (NPPF)**

NPPF and the outline part of planning application DC/092211

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

> *Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions.* ***Planning policies and decisions must also reflect relevant international obligations and statutory requirements.***
>
> **NPPF, 2023, p4**

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

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

Four Tests of Soundness

> *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.*

Alternative ecosystem development needs and access to ecosystem services for the Edgeley community and surrounding areas are presented in Part 4: (*Community, Health & Education*).

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.*

This document itself contains evidence that EWR is important to Stockport, in particular to Edgeley and its community, in biodiversity and ecological terms.

Some alternatives to the outline part of the planning application (Ref: # DC/092211) are presented in Part 7: (*Alternatives)* of this document.

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

National policy, as pursuant with The Environment Act, stipulates considerations relating to the declared biodiversity crisis and meeting legally binding commitments described in Section **3.1.2.** (Page 12).

Achieving sustainable development

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

NPPF, 2023, p5

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

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. (See Part 4: *Community, Health and Education*)

Sustainable solutions would include protecting and enhancing natural environment according to legally binding commitments (listed in Section **3.1.**) 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.

<u>The presumption in favour of sustainable development</u>

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. (See Part 4: *Community, Health & Education)*.

In the context of Edgeley, EWR (as an area of habitat) is irreplaceable.

With the absence of a Local Plan, a Local Nature Recovery Strategy and a Biodiversity Action Plan, and according to the policies in the NPPF 2023, EWR should be considered as an asset warranting protection.

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*)

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. (See Sections **3.1.4.h.** and **3.1.4.i.**)

> *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**

<u>Plan making - Preparing and reviewing plans</u>

> *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**

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

Plan making - Examining plans

> *Local plans and spatial development strategies 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 needs; 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) 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 perceived figure of 150-200 out of 19,750 people. See Part 4: (*Community, Health & Education*) and Part 7: (*Alternatives*).

Decision Making Pre-application engagement and front-loading

> *The 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 impacts and implications of developing the area have not been examined. The existing quality and potential scope of the area of EWR in regard to ecological surveying was lacking. Neither was the lone representation of EWR as viable habitat in the context of the local area considered in context of legally binding commitments to recover nature and improve biodiversity at local and community levels. See Section **3.3.** and Part 5: (*Water, Drainage & Flooding*).

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.

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. See Section **3.1.**

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, marginalized groups, and people with disabilities or health problems, have interests **other than football.** They also need gateways leading to social interaction and local more accessible opportunities to enjoy and benefit from the activities within natural habitat that urban wildlife and nature reserves can provide. Such activities would include being involved in the protection, creation, restoration, enhancement and management of urban nature reserves as well as activities which such reserves can provide. Access to such areas should be one of the priorities considered in town planning. See Part 4: (*Community, Health & Education*).

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. See Sections **3.1.4.h.** and **3.1.4.i**.

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.

<u>Promoting Sustainable Transport</u>

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. See Part 4: (*Community, Health & Education*).

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

An alternative option that can also be considered is a robust match/event day system of park and ride buses from existing nearby town car parks. Such a system would provide added employment opportunities as well as encouraging use of more environmentally friendly 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 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 over-night 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 (E****xcept where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity****).*

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

Planning policies and decisions should:

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

In the case of the development of the outline part of the planning application (Ref: # DC/092211), planned new 'habitat' creation would be fragmented and piecemeal. Much of it would exist in ecologically harsh conditions; it would take decades for trees to become established; soil, microbe and fungi ecosystems would likely take longer; there would be little to no opportunity for deadwood habitat; it would likely be prone to over-management; it would be subject to extremely heavy footfall in immediate

proximity and subject to litter, noise pollution and light pollution; and, is extremely unlikely to ever compensate for the loss of EWR in respect to its existing and potential qualities in contributing toward legally binding commitments to improve biodiversity and wildlife habitat.

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

The idea presented in this document 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****); and*

Identified needs:

As it stands today, EWR can deliver 'benefits for nature, help stem declining wildlife abundance and support efforts to address climate change'. EWR cannot possibly be classed as surplus to requirements considering its potential to be enhanced to offer ecosystem service opportunities to the local community. Opportunities for new provision in the form of a gated nature reserve in an area deprived of access to natural habitat should be informing assessments of the area.

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

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

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

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

NPPF, 2023, p36-38

Achieving Appropriate Densities

> *Planning policies and decisions should support development that makes efficient use of land, taking into account:*
>
> *a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
>
> *b) local market conditions and viability;*
>
> *c)* ***the availability and capacity of infrastructure and services*** *– both existing and proposed – as well as their potential for further improvement and the* ***scope to promote sustainable travel modes that limit future car use****;*
>
> **NPPF, 2023, p39-41**

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 service**s – 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.*

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 water system and the risk of increasing flow pressure westward (including Dale Street) an area already subject to flooding.

In regard to stability of land, policies and decisions should also require consideration of a car park sloping toward houses whose cellars are already subject to flooding.
See Part 4: (*Community, Health & Education*) and Part 5: (*Water, Drainage & Flooding*).

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

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

> *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.

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.*

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**

3.1.4.e. **Biodiversity loss reports and calculations**

In view of a national and regional declared biodiversity emergency have Stockport Metropolitan Borough Council undertaken any calculations or acquired/collected data to demonstrate an understanding of loss (or gain) of wildlife habitat and abundance of species or to assess (with data) the state of wildlife habitat (existing and potential) in the Stockport Area?

In particular regard to the development plan in question and in view of a national and regional declared biodiversity emergency have Stockport Council undertaken any calculations or acquired/collected data to demonstrate an understanding of loss (or gain) of habitat or to assess (with data) the state of wildlife habitat (existing and potential) in the Stockport Area?

Without locally based calculations and acquired/collected data and mapping to demonstrate an understanding of loss (or gain) of habitat or to assess (with data) the state of wildlife habitat (existing and potential) and in view of a lack of a LNRS or Biodiversity Action Plan and pursuant of legally binding commitments related to a declared biodiversity emergency; Stockport Council are duty bound to recognize that the plans to develop or use for development (Ref #: DC/092211) the land in question (EWR) should not be authorized.

If calculations, acquired/collected data to demonstrate an understanding of loss (or gain) of habitat or assessments (with data) of the state of wildlife habitat (existing and potential) have been undertaken by Stockport Council then they should be provided by Stockport Council to the Committee(s) convened to make decisions on the outline part of the planning application (Ref #: DC/092211) in regard to proposed development of the land in question and/or in regard to access, changes to the land in question for the purpose of any planned development in relation to (Ref #: DC/092211).

3.1.4.f. **Areas considered to be of conservation concern locally (Stockport)**

Strategy

The Greater Manchester Biodiversity Action plan (GM BAP) aims to promote the conservation, protection and enhancement of biological diversity in Greater Manchester for current and future generations.

With duty toward legally binding commitments, Greater Manchester Combined Authority is concerned with identifying species and habitats that are of local conservation importance and require action in order to conserve and protect them.

As already mentioned, Stockport has **no viable or publicly visible** Local Nature Recovery Strategy or Biodiversity Action Plan. Currently, Stockport must fall back upon the Greater Manchester Biodiversity Action Plan (GMAP) (see Section **3.1.3.c**). One of the selection criteria listed by GMAP is that habitats are considered to be of conservation concern locally within Greater Manchester.

Stockport Metropolitan Borough Council are duty bound to be agreeing priorities for nature's recovery, mapping the most valuable existing areas for nature, and mapping specific proposals for creating or improving habitat for nature and wider environmental goals.

Strategies for Stockport should include and begin with a count. An inventory should be made of areas which are potential wildlife habitats, potential urban nature reserves, and areas/districts with a lack of wildlife habitats. The inventory; in consideration of community benefits (ecoservices) that such natural habitats have the potential to provide - not least in terms of health, wellbeing and education (See Part 4: *Community, Health & Education*) - should note areas of Stockport which are particularly deprived of access to meaningful (in size) areas of natural green space/wildlife habitat.

Following that, Stockport should examine the wider network and connectivity of existing designated and existing un designated sites capable of sustaining wildlife habitat with a view to protection, restoration and enhancement. By doing this, Stockport will be contributing toward legally bound targets and strategies which have been implemented at national levels and by Greater Manchester Combined Authority (GMCA). By doing this, Stockport will be contributing toward strategies which have been implemented at national levels to create a wider biodiversity network in accordance with the aims of Defra.

3.1.4.g. **EWR and Stockport School's Reports**

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 TackleClimate 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' 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 (Ref #: DC/092211) 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 the planning application (Ref: # DC/092211) and in regard to the wider legally binding commitments aimed at protecting and improving biodiversity.

(See Part 4: *Community, Health and Education*)

3.1.4.h. **Consideration of Edgeley (council ward) as an area of conservation concern**

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

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 spaces. This requires the identification of true natural spaces and the preservation, protection, designation and sometimes enhancement of true natural spaces, especially in urban environments. The presence of and access to natural space is an essential factor contributing to a healthy society.

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 forever.

Sustainable solutions would include protecting and enhancing natural environment and true natural spaces according to legally binding commitments and not mitigating or compensating for their destruction. Local circumstances in Edgeley dictate a need for access to true natural green space (as opposed to managed open parks for human recreation) and such spaces should be protected and their value understood.

The promotion of a sustainable pattern of development would make allowances for areas of true natural space where areas of natural space 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(s) 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.

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. Conservation should be considered in terms of water infrastructure as well as in ecological terms. Conservation, especially in designated conservation areas where cellars of streets running parallel with reservoirs and other local streets are subject to serious flooding should consider local water tables and identify the effect of the removal of woodland and vegetation (roots) on water tables.

Local plans and spatial development strategies should assess that Edgeley is deprived of access to true natural space and wildlife habitat. The outline part of the planning application (Ref: # DC/092211 - development of a car park to the south) involves permanently removing the last reasonably sized 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 in question would involve convincing, encouraging or incentives for use of public transport for an average perceived figure of only 150-200 out of a perceived 19,750 people.

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.

Many individuals in Edgeley, including children, marginalized groups, and people with disabilities or health problems, have interests other than football. *They* also need gateways leading to social interaction and local more accessible opportunities to enjoy and benefit from the activities within natural habitat that urban wildlife areas 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 other activities 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) they 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.

See Part 4: (*Community, Health & Education*)

Edgeley Habitat Survey

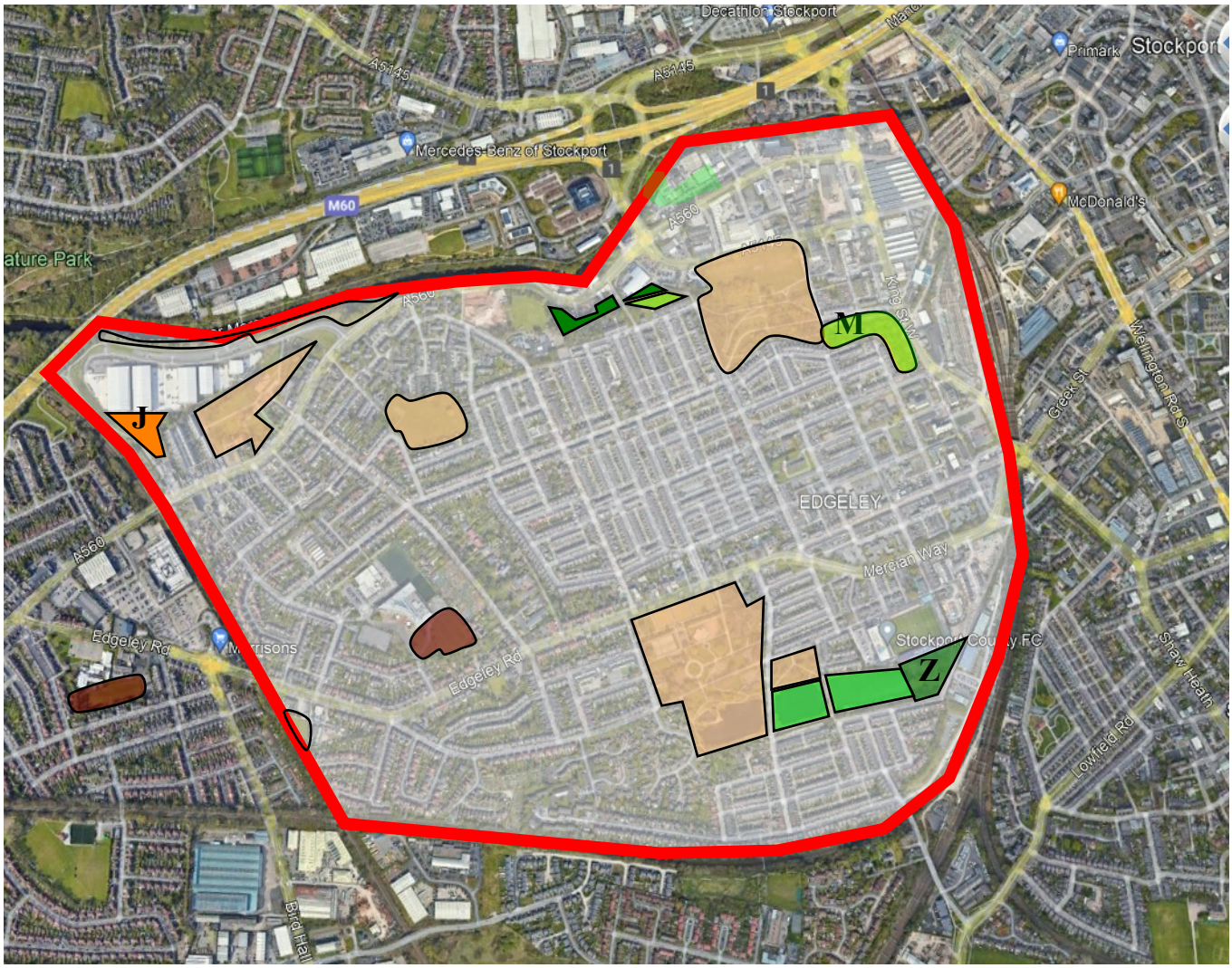
On the following page is a basic survey of wildlife habitat in the council ward for Edgeley, Stockport. Edgeley is built up urban land. For the purpose of this representation, those significant parts which are not have been divided into categories.

These are:

●Managed parks (primarily serving as amenities for human recreation) with heavy footfall and regular management. They are marked in salmon pink on the map.
●Private parks with heavy footfall and regular management. They are marked in lighter green on the map.
●Unmanaged, enclosed (or private) natural or rewilding or rewilded areas with restricted access. These are our areas which have the best suitability for wildlife. They are marked dark green on the map.

There are also some very small wooded areas with open access to the public which suffer regular human intrusion, litter and damage and can be prone to anti-social behaviour, *etc.* These areas are not deemed as suitable for wildlife. They are marked yellow green on the map.

Suitability for wildlife refers to relatively safe and secure hunting, foraging and nesting space - with emphasis on space, security and a natural provision for native species.



Edgeley ward border

Sports field or school playing field - very unsuitable for wildlife

Managed industrial landscape - low suitability for wildlife

Managed parks with heavy foot-fall - low suitability for wildlife *

Unmanaged industrial landscape / scrub - medium suitability for wildlife **

Wooded area with open access to public. Limited security. Low to Medium for birds. Low for mammals.

Private parks with heavy footfall - medium suitability for wildlife ***

Enclosed (private) natural or re-wilding sites & unmanaged sites existing within industrial com-

Edgeley and Natural Space

The presence of birds alone is not an indicator of suitable wildlife habitat. You may have noticed that the birds you see in your gardens or in the trees in your streets, even in the parks, more often than not do not actually live in your gardens or in the trees in your streets. And, though some small areas of parks may offer limited support for bird nesting, you'll struggle to find their nests and their night shelters in the parks.

Parks by their nature are human recreation spaces and although there has been increasing forethought for providing small wild zones in them over recent years, generally speaking, parks are heavily managed areas of land under continuous disturbance, development and constant human activity. They are regularly subject to noise, light, roaming dogs and antisocial behaviour. Something made evident recently when an attempt was made to set fire to perhaps one of the most suitable areas for nesting wildlife in Edgeley park .

Alexandra Park is a beautiful and fantastic place. A credit to those who maintain it. It, along with other community based programs such as Grow Edgeley and Friends of Alexandra Park, are a massive benefit to wildlife in many ways. But human recreation areas cannot be categorized as adequate sanctuaries for wildlife.

The two private angling clubs, on Reservoirs 1 & 2, Gosjacs and EPAC (now merged) offer fantastic habitat for aquatic life. They are fenced off and require membership to enter. They care a great deal for the wildlife and have already stated their support for the proposal of a wildlife reserve upon EWR. The work that these two clubs have done over the years to create and maintain an ecosystem for aquatic life is immense.

In regard to secure and natural space for wildlife, the problem with these two enclosed areas (Reservoirs 1 & 2) is that they are surrounded by only a thin strip of dry land which accommodates the human access points to the reservoirs. Thus, once again, support by way of secure habitat for non aquatic birds and mammals is very limited.

In Edgeley, that leaves us with only three areas of meaningful space which can, as things stand, be deemed as having the capability to support and protect wildlife. Two of them are small sections of inaccessible steep bank woodland behind Larkhill Road overlooking Stockport Audi. The third is the only one of them of any meaningful degree in respect to size and the only one offering accessibility. That area, situated at the end of Moscow Road East next to reservoir #1, is the subject of this document and is referred to as *EWR*.

Situated outside of Edgeley to the west (within the old Edgeley ward boundary) is a similar area. That exists in the immediate vicinity, most of it on the actual premises of, the sewage works. What a testimony of our devotion to our natural heritage that is. That the descendents of the creatures we shared this land with for three and a half thousand years are forced to resort to living among the stench of our sewage.

Edgeley ward now consists of approximately 571 acres. Of those 571 acres, as things are, only 3.57 acres are capable of providing secure and safe space to wildlife in terms of habitat areas.

In percentage, that means that 99.3% of the surface area of Edgeley is incapable of supporting wildlife habitat to any consistent, self sustainable or meaningful degree. Without the land we are making a case for today, it would be less … and all that remains would be situated outside of Edgeley ward among the sewage works.

Testimony

Yew trees are native British trees. A long time before football our warriors used to make bows from them. My father was born and bred in Fallowfield, just a longbow relay from here. My mother, her two sisters and her brother were born and bred on Edgeley. They used to race tortoises on Bulkeley street. They lived in a time, not long ago, when taking a walk to pick blackberries and gooseberries on some nearby place I can't find anymore was normal. The only Yew tree I know of outside of a garden is in EWR.
When was the last time you ate hazelnuts? I can't find any. Do you even know that hazelnuts are native British plants? What on earth happened up the A6 in Hazel Grove?
I consider myself very lucky. Before I moved back to this area twenty-seven years or so ago I grew up in another town right next to a wood. I grew up in the woods. Without such land for which we are making a case for today, no kids this side of Edgeley will be able to witness or experience, or learn about their natural history, without getting in a car or onto a bus or a train. They won't even be able to see a glimpse of it. All that would remain would be situated among the sewage works at the other side of Edgeley. They will have to wear pegs on their noses just to get close to it.
What are you going to tell your children happened? Natural history is cultural history, it's in their blood and a WHOLE lot of people HAVE and STILL ARE overlooking the effect of too much urbanisation on the mental health of our young generations . The opportunity to sit in a quiet wood close to home, listening to the wind rustling in long grasses should be a right. There shouldn't be a battle to protect it.

Edgeley Resident / Member of EWRG

Testimony

It seems that the final battle of the British people is not taking place within the woods and meadows but rather, is FOR the woods and meadows. For the sake of the upbringing of British children and the wildlife they adore WHEN and WHERE does this stop?

Edgeley Resident / Member of EWRG

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3.1.4.i. **Consideration of EWR as a Nature Reserve**

The area subject to the outline part of the planning application (Ref: # DC/092211) is the most valuable in Edgeley in terms of environmental value and in terms of potential for establishing a basis for ecoservices related to health and wellbeing and education.

The lone representation of EWR as viable habitat in the context of the local area considered in context of legally binding commitments to recover nature and improve biodiversity at local and community levels needs to be considered.

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 National Planning Policy Framework 2023, The Environment Act, and legally binding commitments toward biodiversity in regard to ecology, habitat and local communities, EWR should be considered as an asset warranting protection. See Section **3.1.**

> **S***pecies recovery and habitat restoration projects make a difference. Improving habitat is good for nature and for people but it also helps mitigate and adapt to the impacts of climate change.*
>
> **Katherine Hawkins, Nature Policy Manager, The Wildlife Trusts**

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 accessible 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.

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 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.

EWR is comprised of woodland, grassland habitat, and scrub. As a whole area it is of a scope and size which cannot be replaced locally. Compensation strategies published by the planning application (Ref: # DC/092211) and in relation to the outline part are too fragmented and piecemeal and exist of areas too small or narrow to be considered viable solutions in terms of habitat compensation. 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 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.

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.

More detail about the habitat of EWR is presented in **Chapter 3.2.**

EWR and Green Corridors

In today's urbanised world, green corridors are an essential aspect of nature's survival. Green corridors provide a network of communication for many species, often linking habitat areas to each other. Sadly, it is increasingly becoming the case (especially in highly concentrated urban areas) that the corridors themselves are the only habitat and home that wildlife has to rely upon. Many of them exist as railway embankments. Thankfully, Network Rail take their duty to wildlife and the biodiversity crisis very seriously and contribute toward maintaining these corridors for wildlife.

There are national strategies in place aimed at designating, creating and maintaining green corridors. It is an ongoing process and not all corridors are identified or designated. Not only birds and mammals rely upon green corridors. Amphibians and insects (the basic building blocks of the food chain) and important pollinators also rely upon them.

All bodies and authorities concerned with the state of nature in the UK are fully aware of the importance of green corridors.

> *Much of England's wildlife is now restricted to wildlife sites, which consist largely of semi-natural habitats. However, surviving in small, isolated sites is difficult for many species, especially in the longer term and given climate change. We want a large number of high quality sites which contain the range and area of habitats that species require. We also want ecological connections that allow species, or their genes, to move between these sites. For many species, habitat does not have to be a continuous, physical connection for them to disperse. An ecological network is this network of high quality sites, protected by buffer zones, and connected by wildlife corridors and smaller, but still wildlife-rich, "stepping-stone" sites.*
>
> **Biodiversity 2020, p19**

EWR is situated upon a green corridor and is an important link between outlying habitats to the south and the reservoirs. The image below illustrates the position of EWR in relation to a green corridor.

The location of EWR as as a nature reserve and a knuckle in a green corridor serving the reservoir area means it is essential to the wildlife we experience in Edgeley. EWR's position adjoining the railway premises means it is in fact the most valuable link to the ecology of the reservoir area and Alexandra Park.

A Greater Picture

Pursuant of legally binding targets aimed at improving biodiversity, stemming habitat loss and adressing the demise of species abundance, Defra and Natural England put huge emphasis on Coherant Ecological Networks.

To the south of Edgeley, beyond Adswood, is the potential to create a core habitat country wildlife park which would offer Stockport great future employment and economic opportunities.

That is the subject of another document.

3.2. EWR - in more detail

The following pages describe and illustrate EWR as it is today. The images in this section were all taken in spring and summer 2024. This should contrast sharply with the images utilised by the ecological surveys provided as part of the outline planning application.

EWR is an extraordinary space in our community. On hot days, the mature trees provide a cool shaded area in which to stand and enjoy urban nature at its best. EWR is often alive with the sound of birds and the buzzing of bees and other insects, including dragonflies. If you catch the right dawn and stand by the railings you will hear a dawn chorus that will blow your mind.

The sound of the wind in the trees and in the long grasses by the footpath can stimulate the senses unlike most other parts of Edgeley. The bats flying overhead as you walk past are not vampire bats. No need to be afraid. They just love those bugs which *are* the vampires.

The site is crawling with insects and serves as an important larder and link in the food chain for wildlife not just on site but on the neighbouring reservoir and Alexandra Park. A natural spring fed rivulet runs through EWR under the ground intrinsically linking this site with the reservoirs and thereafter the wider river system.

Image of EWR

3.2.1. Habitat

Ecologists have categorised the habitats at EWR as Broadleaf Woodland, Grassland and Scrub. Each type of habitat offer different ecological aspects to an area. Each sub-habitat contributes to the richness of an area as a whole. Different creatures which depend on or use whole areas will utilize aspects of each sub-system. Birds, for example, may consume berries from the scrub, insects from the woodland and use fibres from the grasses to make nests. Each part of an area's habitat is important to the ecosystem for varying reasons and each part often important to the other. Variations of habitat offer variations of food, shelter, security and nesting for a variety of wildlife.






All images are of EWR

i. Woodland

In spring, 2023, 77 trees of various types were counted across the whole area of EWR. Only mature and young established trees were counted. Apart from the Scots Pine and the Yew, saplings or trees of less than 7ft in height (of which there are many) were not counted. The TEP survey counted a total of 280 trees in EWR. Although not ancient, new or secondary woods are still important. Secondary woods and individual trees offer many species of wildlife a home and are important to people and culture in all sorts of ways.

Image of EWR

Image of EWR

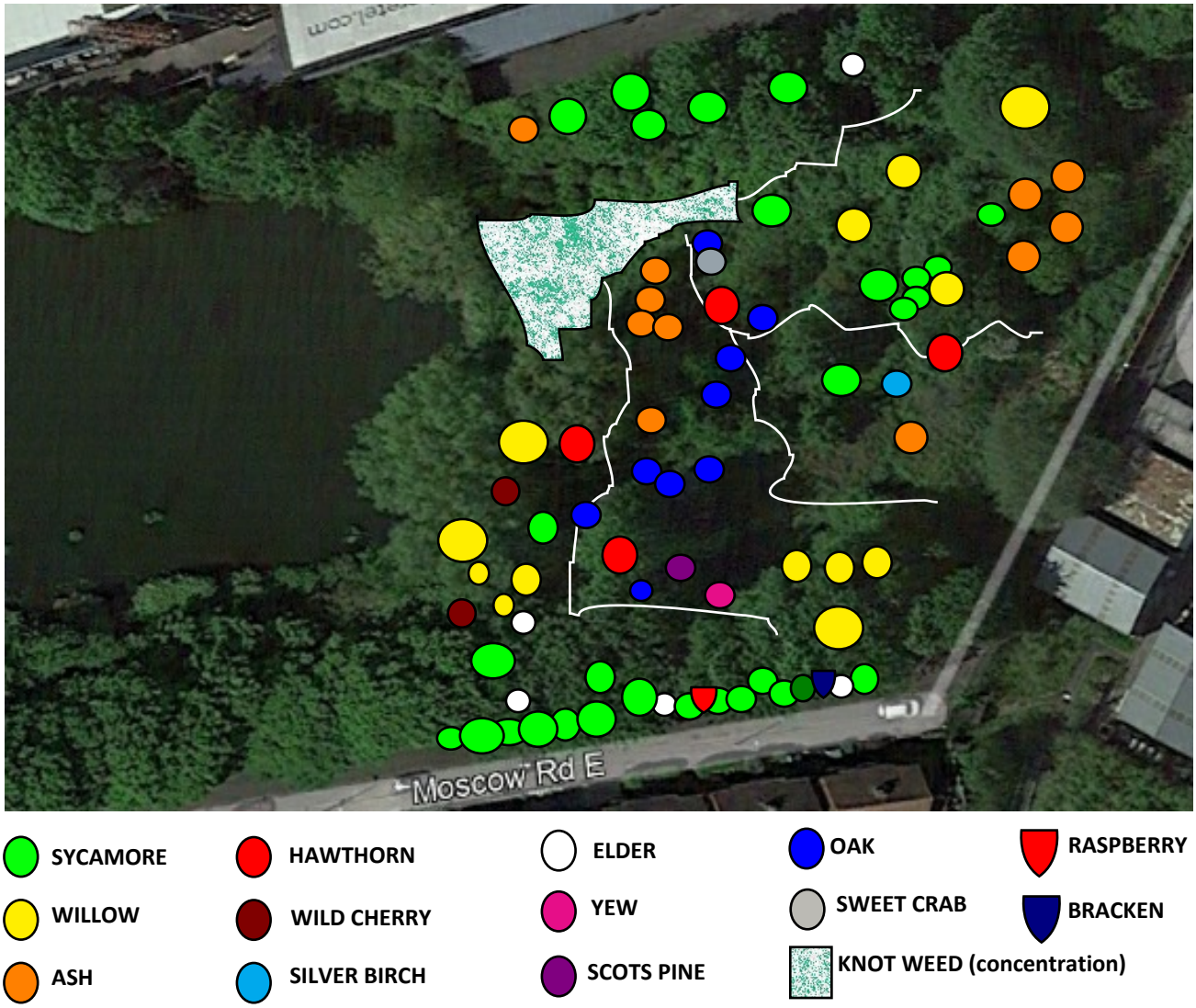
Underrated heroes, colourful comforts and spaces for people and wildlife. Urban trees and woodland are all the more valuable for their location. They support plants and animals, clean our air and boost wellbeing.

The Woodland Trust

Trees identified in EWR:

Ash, Bird Cherry, Elder, Hawthorn, Holly, Oak, Scots Pine, Silver Birch, Sweet Crab, Sycamore, Wild Cherry, Willow, Yew.

No positioning software was available to us and the trees are plotted below as accurately as possible.



With our woods, green spaces and the wider countryside becoming ever more fragmented, urban woods and trees support a huge range of wildlife.
The whole urban forest forms a crucial lifeline, helping birds, insects and more animals move through the landscape safely, and find food and shelter. All of those gardens, parks and playing fields with trees can act as stepping stones between larger wild places that would be isolated on their own.
Common urban wildlife includes some familiar faces, such as the blackbird and fox, but other species also flourish in built-up areas, like the sparrowhawk and hedgehog.

The Woodland Trust

About the trees in EWR:

All of the trees in EWR have significance to us culturally, as potential for community, and for the precious wildlife we cherish. Some of the trees threatened by development were planted personally by local residents to enhance the site or in memory of loved ones.

English Oak

The king of all our stately trees, English oak was the preferred timber for sailing ships, particularly warships, because of its strength and durability. The English oak tree supports more wildlife than any other tree in the UK. We counted 9 in the Wildlife area. The Oak tree hosts hundreds of insects/beetles/birds' bats and fungus. The acorns are an important food source in the autumn for mice, squirrels and badgers. The soft leaves of the Oak break down to create excellent mulch, ideal for invertebrates and continued habitat. Birds and bats nest in and under the bark of oaks and feed on the rich insect life in and around the canopy.

Ash

One of the most common trees in the UK, currently threatened because of Ash die back. They thrive in fertile soil and have a long history of medicinal and mystical properties and was burned to ward off evil spirits. Ash trees make the perfect habitat for several different species of wildlife. Bullfinches eat the seeds and woodpeckers, owls, redstarts and nuthatches use the trees for nesting. Ash trees are in the olive family and produce oil that is similar to olive oil. Very strong and flexible , wood of choice for making tools and sport handles, including hammers, axes, spades and used to produce oars, hockey sticks and snooker cues.

Bird and Wild Cherry

As its name suggests, the bird cherry is a native tree related to the wild cherry. It can be found in wet woodland or along stream edges and hedgerows. As it can tolerate greater exposure and elevation than wild cherry, it often grows in upland woodlands. Its fragrant flowers appear around April and produce black and bitter fruits. It is a useful tree for a variety of wildlife: the flowers provide nectar and pollen for insects, and the fruit are eaten by birds, badgers and small mammals. Additionally, some moth caterpillars eat the leaves.

Elder

Elder is a shrub of woodland edges, hedgerows and grassland scrub, but can also be found on waste ground, in cemeteries and even on rubbish tips. It prefers rich, fertilised soils, so is a common sight in urban areas and on cultivated ground. Despite its reputation as a bad-smelling, opportunistic 'weed', elder is regularly used as food - the autumn berries and spring flowers can both be eaten (the latter

sometimes battered and fried), and the blossom can be used to make the popular elderflower cordial and also wine.
The flowers provide nectar for a variety of insects and the berries are eaten by birds and mammals. Small mammals, such as dormice and bank voles, eat both the berries and the flowers. Many moth caterpillars feed on elder foliage, including the white-spotted pug, swallowtail, dot moth and buff ermine.

Hawthorn

The fruit is enjoyed by wildlife and humans alike and can be used to make jellies, chutneys and wine.
Makes up a large percentage of British hedgerows. The leaves of this hedgerow staple are often the first to appear in spring, with an explosion of pretty pale-pink/white blossom. It simply teems with all types of wildlife from bugs to birds. Common hawthorn can support hundreds of species and is the foodplant for various wildlife such as caterpillars of moths, including the hawthorn, orchard ermine, pear leaf blister, rhomboid tortrix, light emerald, lackey, vapourer, fruitlet-mining tortrix, small eggar and lappet moths.
Its flowers are eaten by mammals such as dormice and provide nectar and pollen for a variety of bees and other pollinating insects. The haws are rich in antioxidants and are eaten by various migrating birds as well as small mammals.
The dense, thorny foliage makes fantastic nesting shelter for many species of bird and the gnarled wood is used to make handles and walking sticks.
The Cornovii believe that Boudicca was buried wearing a crown of thorns made of hawthorn beside a mere somewhere in Cheshire after dying en-route to North Wales seeking solice and healing with the druids. Along with a grand old willow, a spectacular specimen of Hawthorn, unusually tall and narrow is one of the centre pieces of EWR.

The spectacular specimen of Hawthorn in EWR

Holly

Holly is one of our most familiar evergreen trees, its bright red berries and glossy leaves bringing colour and life into our gardens and homes in winter, particularly at Christmas (the berries and thorny leaves are said to symbolise Jesus's blood on the crown of thorns). Our wildlife enjoys Holly, too: the berries are an important food source for many birds like Redwings and Fieldfares; indeed, Mistle thrushes guard their own berry-laden bushes with such voracity that they'll chase off any potential thieves. Holly can be found in a variety of habitats, from remote woodland to urban gardens.

Holly provides dense cover and good nesting opportunities for birds, while its deep, dry leaf litter may be used by hedgehogs and small mammals for hibernation.
The flowers provide nectar and pollen for bees and other pollinating insects. The leaves are eaten by caterpillars of the holly blue butterfly, along with those of various moths, including the yellow-barred brindle, double-striped pug and the holly tortrix. The berries are a vital source of food for birds in winter, and small mammals, such as wood mice and dormice.

Scots Pine

The Scots pine is the native pine tree in Scotland and has been widely planted elsewhere in the UK, too. During the medieval ages, a great pine forest stretched across most of the Highlands, but by the 17th century, it was disappearing as timber was used for ship-building and charcoal. Although the late 20th century saw just a fraction of the original forest left standing, regeneration has now started to occur, especially in areas fenced off from browsing deer. This is good news for wildlife as Scots pine forests provide shelter for all kinds of species, and food for threatened Red Squirrels and endemic Scottish Crossbills.
The Caledonian forest is a priority habitat under the UK Biodiversity Action Plan and is home to rare species such as the creeping lady's tresses and lesser twayblade orchids; the Scottish wood ant and Rannoch looper; and the capercaillie, crested tit and Scottish crossbill. Mammals include red squirrel, pine marten and Scottish wildcat. Scots pines in southern England are also the main caterpillar foodplant for the pine hawk-moth.

Silver Birch

The Silver birch is a familiar, small, spindly tree with thin branches and papery bark. It is found on heathland, moorland and mountainsides, as well as on dry, sandy soils. In spring, the male catkins (or 'lamb's tails') turn yellow and shed their pollen, which is carried by the wind to the short, green, female catkins that appear on the same tree. One of the first trees to recolonise the UK after the last glacial period, it is an opportunistic species; its seeds are produced in huge numbers and dispersed easily by the wind. Birch woods (which may include downy or silver birch, or both) have a light, open canopy, providing the perfect conditions for grasses, mosses, wood anemones, bluebells, wood sorrel and violets to grow.
Silver birch provides food and habitat for more than 300 insect species – the leaves attracting aphids which provide food for ladybirds and other species further up the food chain. The leaves are also a food plant for the caterpillars of many moths, including the angle-shades, buff tip, pebble hook-tip, and Kentish glory. Birch trees are particularly associated with specific fungi, including fly agaric, woolly milk cap, birch milk cap, birch brittlegill, birch knight, chanterelle and the birch polypore (razor strop).
Woodpeckers and other hole-nesting birds often nest in the trunk, while the seeds are eaten by siskins, greenfinches and redpolls.

Sweet Crab

One of the ancestors of the cultivated apple (of which there are more than 6,000 varieties), it can live to up to 100 years. Mature trees grow to around 10m in height. They have an irregular, rounded shape and a wide, spreading canopy. With greyish brown, flecked bark, trees can become quite gnarled and twisted,

especially when exposed, and the twigs often develop spines. This 'crabbed' appearance may have influenced its common name, 'crab apple'. The crab apple is one of the few host trees to the parasitic mistletoe, Viscum album, and trees are often covered in lichens.

The leaves are food for the caterpillars of many moths, including the eyed hawk-moth, green pug, Chinese character and pale tussock. The flowers provide an important source of early pollen and nectar for insects, particularly bees, and the fruit is eaten by birds, including blackbirds, thrushes and crows. Mammals, such as mice, voles, foxes and badgers, also eat crab apple fruit.

Sycamore

With its familiar helicopter fruit known as SAMARAS we used to throw into the air and watch as they spun to the earth. Traditionally not valued by planners because they're not indigenous having been introduced by the Romans nearly 2,000 years ago. Since then, they've colonised woodland becoming a source of food and shelter for numerous wildlife.
Sycamore is particularly attractive to aphids and therefore a variety of their predators, such as ladybirds, hoverflies, birds and other insects.
The leaves are eaten by numerous wildlife including the sycamore moth, plumed prominent and maple prominent. The flowers provide a good source of pollen and nectar for bees and other insects and the seeds are eaten by a variety of birds and small mammals.
Sycamore timber is hard and strong, pale cream and with a fine grain, and is excellent for carving. It is used to make furniture and kitchenware, such as ladles and wooden spoons as the wood does not taint or stain the food. Very tolerant of pollution and are ideal street trees good for filtering and cleaning the air.

Willow

Silvery leaved, waterside and fenland dweller. Willow feeds and shelters numerous native wildlife and have been a source of natural remedies for centuries.
Various caterpillars and moths feed on the leaves, (such as the ones on the slide). The catkins are an important source of early nectar and pollen for bees and other insects, and the branches make good nesting and roosting sites for birds.

Used to produce Aspirin, derived from salicin, a glucoside found in the bark. In medieval times, in many parts of Europe, used to be chewed for pain relief. The bark was also boiled in water and drunk to relieve diarrhoea, reduce joint inflammation in arthritis and as a gargle for sore throats. The liquor was also used to stop bleeding, clean wounds and to treat general aches and pains.
Did you know willow is used to make cricket bats.

Yew

Mature yew trees can grow to 20m. The bark is reddish-brown with purple tones, and peeling. The yew is probably the most long-lived tree in northern Europe. Yew hedges are incredibly dense, offering protection and nesting opportunities for many birds. The goldcrest and firecrest nest in broadleaf

woodland with yew understoreys. Yew timber is incredibly strong and durable. Traditionally, the wood was used in turnery and to make long bows and tool handles. One of the World's oldest surviving wooden artefacts is a yew spear head estimated to be around 450,000 years old.

Anti-cancer compounds are harvested from the foliage of Taxus baccata and used in modern medicine.

The fruit is eaten by birds, such as the blackbird, mistle thrush, song thrush and fieldfare; and small mammals, including squirrels and dormice. The leaves are eaten by caterpillars of the satin beauty moth.

Testimonies:

> I've been a resident of Edgeley for over 20 years and before that, just down the road in Cheadle. I was the Parky on Alex Park for over 5 years and a Park Ranger based at Alex Park for over 10. I'm therefore very familiar with the park, the reservoirs and the wildlife reserve we're talking about. I'm also very familiar with all the parks, open spaces and river valleys in Stockport having inspected them routinely on a weekly basis, so I know how rare and important this wildlife area is in Stockport.
>
> **Edgeley resident / Member of EWRG**

> I grew up in Edgeley facing a tiny wood that's now gone for flats. Edgeley Wildlife Reserve on Moscow Road East is so nice for the nature, all the insects in there feed everything else. The greenery of it all looks beautiful in spring and summer, and the wild flowers. The creatures have to live somewhere. They're already there so don't move them. They've got nowhere else left to go. School outings could take children to see the butterflies and flowers. There's nothing left in Edgeley anymore. No wonder everyone round here is depressed.
>
> **Edgeley resident / Member of EWRG**

ii. Scrub

A great deal of undergrowth (mainly brambles) which offers immense protection to insects, birds and mammals is situated central to the area.


Image of EWR


Image of EWR

Bramble flowers are a food source for honey bees and bumblebees and other wild animals. Leaves are eaten by certain caterpillars as well as some grazing mammals, especially deer. Ripe berries are eaten and their seeds dispersed by several mammals such as fox and badger, and small birds. Bramble is also a habitat for some animals, including grass snakes.

Scrub, Indigenous Culture and Bioservice:

The pastime of blackberry picking (blackberrying) goes back thousands of years and is still popular. Ripe juicy blackberries have high vitamin C content and can be eaten raw or cooked. You can add them to pies, crumbles, wines, jams, jellies and vinegar. Strong ale brewed from blackberries, malt and hops was popular in the 18th and 19th centuries.

It's been widely been used in traditional medicine for its healing and detoxifying properties and fibres from its stems have even been used to make string.

Blackberry bushes can prevent soil erosion on infertile, disturbed sites and the ancient Britons used thorny stems as a boundary or barrier in the way we use barbed wire.

The Woodland Trust

Scrub and Wildlife:

Brambles protect the nesting birds we love to see and hear, including thrushes, robins, long-tailed tits, finches and warblers. They also provide shelter for shy or threatened species found in quiet places, such as the woodcock, which hides at ground level, and dormice, which climb and nest among the stems.

Although blackberry plants swamp other species, they are a part of successional woodland growth, protecting saplings from grazing animals so they can grow up and succeed them. If you have enough land to grow woodland, this might be useful to know.

Bramble flowers are open, prolific and generous suppliers of pollen and nectar for insects – from bees, wasps and hoverflies to beetles and butterflies. Meadow Brown, Speckled Wood, Comma, Silver-washed Fritillary, Gatekeeper, Ringlet and Small Skipper are among the butterflies I've seen amongst bramble.

The berries form an important food for creatures great and small – from foxes, badgers and small mammals like wood mice and rare dormice to birds and insects. A few days ago I noticed a horse delicately picking blackberries with its lips, and dogs do this too.
The leaves are food for wildlife as well. Buff Arches, Peach Blossom and Fox moth (cuckoo food) caterpillars are amongst the many moth larvae that eat them, not to mention many fly and beetle larvae. You will see many spiders on brambles catching flies. I often wonder how they know to make their webs above the juiciest berries.

We can use the youngest leaves in salads, apparently, as well as using the fruits in delicious jams and puddings. Brambles are used in traditional medicines, too.
We can use the whole plant as a protective fence or hedge component to keep large animal and human intruders out.

Rowena Millar, The Wildlife Trusts


Image of EWR

iii. Grassland

On the eastern edge, parallel to the footpath and either side of where the spring fed rivulet runs underground (seen in the image below where the track is), grassland offers tall grasses and a variety of pollen and nectar rich wildflowers at various times of the year. Sometimes full of colour and the buzzing of bees and hoverflies.

From woodland glades and wildflower meadows, to pasture and sports fields, grassland covers large areas of the UK. They can be diverse wildlife havens and many have developed from human activities.

The Woodland Trust

What grassland can offer:

Grasslands are areas dominated by grass cover, but they can also contain lots of other plants. Grasslands cover large areas of the UK, but most are highly modified by land management and agricultural 'improvement'. Semi-natural grasslands **are very scarce**, and some wooded areas contain important pockets of semi-natural grasslands within glades, rides, wood-meadows and clearings.


Image of EWR

Mini-Meadow (an aim of EWRG)

Rich grasslands can have as many as 30 species of wildflower within a quarter of a square metre. Wild flowers, such as orchid, cowslip and red clover blanket may be seen in unimproved grassland in the spring and summer.

The Woodland Trust


Image of EWR

3.2.2. Flora

The following plants have all been identified on EWR in the year 2023 and 2024. Many of them exist in the grassland habitat (mini-meadow) through which (the now underground) spring fed rivulet runs.

Bindweed, Bluebells, Bracken, Bramble, Buddleia, Buttercup, Camomile, Cocksfoot, Coltsfoot, Common Plantain, Daffodils, Dandelion, Dock, False Oat Grass, Fern, Field Clover, Forget-Me-Nots, Foxglove, Gooseberry, Greater Willowherb, Hemp Agrimony, Ivy, Lesser Willow Herb, Nettle, Nipplewort, Ragwort, Raspberry, Red Shank, Sedge Grasses, Spear Thistle, Sticky Willy, Sweet White Clover, Sweet Yellow Clover, Thistle (various), Tufted Vetch, Welsh Poppy, Yorkshire Fog.


Image of EWR


Image of EWR


Image of EWR

3.2.3. Fauna

EWR is a rare green jewel offering sanctuary to wildlife amongst many acres of urban built-up land. This 1.5 acre parcel of land is special because for over 50 years it has been left virtually shut off from human disturbance and interference and as a result nature has very successfully reclaimed it for herself.

Managed Parks or Human Recreational Areas like Alexandra Park and Edgeley Park, whilst beautiful and immensely helpful for human mental health and well-being, cannot be categorised as sanctuaries for wildlife in the same way as EWR. In percentage terms, less than 4% of the entire surface area of Edgeley is capable of supporting wildlife habitat to any consistent, self-sustainable or meaningful degree and here it is.

Now covered in years' worth of soil build-up, brambles, woodland and grassland, EWR provides fantastic habitat. The whole site is teeming with invertebrates (worms, slugs, beetles, insects, spiders, butterflies, moths, centipedes and millipedes) it has them all in unprecedented numbers. The security afforded by being fenced off, and the brambles and shrubs, along with all the invertebrates and trees, has made EWR special to Edgeley.

The fenced off nature of EWR has provided a constant safe refuge to foxes who have their den there and raise fox cubs to the delight of Edgeley residents when the cubs stumble through the fence and totter off down Moscow Road East or play in neighbourhood gardens.

Foxes, toads, hedgehogs, rats, birds, an occasional badger, moths, butterflies and a myriad of insects including dragonflies have and still can be experienced in EWR. Bats, both Pipistrelle and Noctule can be seen feeding above EWR late in the evening. Local people remember newts and a badger which used the railway premises as a corridor. Foxes are a regular sight, having a number of dens against the northern bank within EWR and help to control the local rat population.

One of our foxes

Imagine if the area were developed, where would the rats go? What if there were no foxes there to hunt them? We all remember the swarms of rats (in broad daylight) disturbed during the construction of the Cheadle End. One local lady on Finland Road recalls seeing swarms of them running through local streets. They got into the walls of her house and ate the electric wires, causing thousands of pounds of damage.

Birds

The area is home to many birds and attracts others - some that nest there and others that fly in-and-out looking for invertebrates to macerate to feed their young or for materials from among the many grasses and wildflowers to line their nests.

A Bird Survey conducted looking over EWR perimeter fence over 10 days (45 mins every morning) in March 2023, revealed by sight or assisted with binoculars that at that time 14 different species either lived there or were foraging for food or nest materials.

Regularly spotted, were: Blackbirds, Blue tits, Collared Doves, Crows, Great tits, House Sparrows, Long-tailed tits, Magpies , Robins, Woodpigeons and Wren.

House sparrows are of particular interest as they are listed on the Red List in the Birds of Conservation Concern 5 (2021). *i.e.* of most concern. Worryingly, the Red List now accounts for more than one-quarter (29%) of UK species, more than ever before. Amongst the new additions to the Red List is the Swift. A swift was seen flying directly over EWR in July 2024.

The robins, blackbirds, great tits, long tailed tits, woodpigeons and wrens are always most visible, appearing to have generations nesting there every year. Of wonder in spring was the daily sighting of the long-tailed tits gathering spiders' cobwebs off the car wing mirrors along Moscow Road East and flying back up high into the trees in EWR to make their cobweb pouch nests suspended against the tree bark.

Two other birds spotted are of particular interest in as much as they are listed as Section 41 in the Birds of Conservation Concern 5 (2021). Namely: Dunnock and Bullfinches.

Bullfinches are thinly distributed across the UK and are rarely spotted as there are only 265,000 breeding pairs in the country. They enjoy scrubby areas of bramble undergrowth near woodland edge, orchards, hedgerows and even parks and gardens. They feed on buds, berries, seeds, and particularly enjoy macerated insects to feed their young. There is a strong possibility that bullfinches might nest in the brambles in EWR as they have been spotted numerous times by residents of Moscow Road East since March 2023. The dunnock may also nest here as its preferred habit is vegetated areas with scrub and likes to nest close to the ground in hawthorn or brambles. The wren likes to feed in the brambles on the plentiful insects and spiders. The house sparrows were incredibly busy in March 2023 flying in and out of EWR with beaks full of grasses, returning to the rafters of our terrace houses to build their nests. They similarly need to fee their young on macerated invertebrates.

Unusually, in 2010/11 a tribe of magpies numbering over thirty gathered in two of the maturer trees along the edge of EWR before dispersing suddenly in the winter of 2012. A family of pied wagtails used the area for years but have not been seen for the last three or four. In 2023 a Nuthatch was spotted walking upside down clinging to a thick stem of a large tree and since the introduction of the Merlin App (on mobile phones) that recognises bird song Blackcaps and Chiffchaffs have been recorded in EWR. In fact, it is obvious (by their calls) that chiffchaffs have moved into nest there this year (2024).

It is clear that many birds live in EWR whilst others just pop in and out to use it as a larder to supplement their dietary intake also finding it a useful wild place to source nesting material in the

spring. How wonderful it is for residents of Edgeley to live in such close proximity to this beautiful oasis in an urban sprawl. The unique combination of having the parks alongside three bodies of water and a rewilded fenced-off parcel of land (EWR) bursting with insect life and berries and other resources combines to directly enhance and support all the wildlife activity we see.

The reservoirs also support a lot of other bird life as well as Mallards, Coots, Moorhens and Canada Geese. We often have Cormorants and Herons too. In the summertime Kingfishers visit and every November approximately 20 Goosanders fly in from Scandinavia making their home on the reservoir for five months before flying back in the springtime.

Whilst these aquatic birds do not generally frequent EWR, neither to forage nor nest (with the exception of the herons who have nested high up in EWR trees and the occasional lone Canada Goose looking for lost chicks) we fully understand to what extent the impact of loosing EWR's part in the local ecosystem will have on the biodiversity of all the reservoirs.

Pipistrelle Bats are commonly seen at dusk flying up and down Moscow Road and Moscow Road East, as well as flying low across the reservoirs and around EWR. This is the ideal habitat for them as they consume up to 3,000 insects per night consisting of: aquatic-flies, mosquitos, midges and other invertebrates such as moths. The reservoirs provide the aquatic-flies and EWR the invertebrates in plentiful amounts. Pipistrelle Bats enjoy urban areas and like to roost in trees, and also in between old roof tiles of the 120 year old terrace houses in the conservation area around the reservoirs.

Noctule Bats are the UK's largest bats. They can be seen flying higher than the Pipistrelles over the Edgeley Reservoirs and EWR. The Noctule Bats can be seen earlier than dusk in the summer months. They enjoy a diet of moths, beetles, mayflies and flying ants. Sadly, populations of Noctule Bats have declined greatly in the last few decades, due to a loss of habitat. This is a consequence of urban development which has resulted in the loss of mature trees used for nesting and hibernation. The Noctule bat is a priority species in the UK's Biodiversity Action Plan. It is also protected in the UK under the Wildlife and Countryside Act 1981.

Foxes

Not only is it a joy to see the fox cubs in the summer and hear the vixens calling for a mate, telling you it's nearing the end of the winter, but they also provide a great service in the ecology of the reservoirs helping to keep a natural balance. With so little natural wild habitat urban foxes primarily scavenge for food but given the chance they will hunt for small mammals such as rats and mice, helping to keep rodent numbers under control. At times there are many rats around the reservoirs and given that expert ecologists are undecided for sure whether we in urban areas

One of our foxes in a garden at the east end of Moscow Road East

live 6ft, 10ft or 15ft away from a rat, it can only be a good thing to have resident foxes in EWR that patrol up and down the streets and around the reservoirs most nights. Not only do they assist in keeping rat populations down but foxes will take the opportunity to seize Canada Goose eggs and young, keeping in check their rapidly breeding numbers.

This 1.5 acres parcel of land is acting as a vital lifeline to many urban wildlife creatures. To needlessly take it away to create yet another carpark in such a large urban area will deny foxes a home. They have lived amongst us for so long and played their part around the reservoirs in keeping rat populations down and given such delight. To partially take some land and leave a bit will still render the whole site almost useless as foxes will not want to live so close to human disturbance. EWR provides security to raise cubs and gaining access to the Rail Line embankment opens-up miles of green corridors for the foxes to forage in and keep their population healthy.

Edgeley Reservoirs were placed here because there are natural fine white sand springs with rivulets under EWR making it an ideal home for city wildlife. This rare green jewel with rivulets of water, mature trees, grasses, scrub and beautiful flora, acts as a haven and place of shelter to wildlife. The plentiful invertebrates and blackberry brambles make it like a fantastic larder for nature and a secure home for many birds, mammals and amphibians. It is a **RARITY** in the grey dull urban sprawl! It is a green jewel, a true treasure of Edgeley.

Birds known to have utilized EWR directly (including outside of survey period March 2023):

Black Headed Gull, Blackbird, Blackcap, Blue tit, Bullfinch, Canada Goose, Chiffchaff, Coal tit, Collared Dove, Crow, Dunnock, Gold Crest, Goldfinch, Great tit, Grey Wagtail, House sparrow, Little Owl, Long tailed tit, Magpie, Meadow Pipit, Nuthatch, Pied wagtail, Robin, Rock Dove, Song Thrush, Sparrow-hawk, Swifts, Woodpigeon, Wren

Kingfisher (not in EWR but within 20m)
It is also beleieved Starlings use the grassland area in winter to feed.

<u>Most Threatened</u>

In England many of our rarest and most threatened species are listed under Section 41 (S41) of the 2006 Natural Environment and Rural Communities (NERC) Act. Outcome 3 of the Government's Biodiversity 2020 strategy contains an ambition to ensure that 'By 2020, we will see an overall improvement in the status of our wildlife and will have prevented further human-induced extinctions of known threatened species.' Protecting and enhancing England's S41 species is key to delivering this outcome.

Bullfinch, Dunnock, House Sparrow, Herring Gull, Song Thrush

3.2.4. Water

Also see Part 5: *Water, Drainage & Flooding*

According to historical record, a natural spring fed rivulet runs through EWR. It is now piped underground through EWR and is joined by rainwater runoff from the railway premises. The rivulet emerges again as it enters the reservoir area. This little stream is essential to the ecosystem of the reservoirs and the wider river system. The pressure created by its piped state during heavy rainfall could even be contributing to flooding further along on Dale Street. A local man connected with Gosjaks remembers when the spring fed stream ran openly through EWR.

Water Table:

Historical record suggests that the whole site (possibly including the stadium itself) exists upon fine white sand springs. The presence of fine sand springs would also suggest that there is a deep clay bed below upon which the water table sits. Houses south of EWR suffer flooding to the cellars due to the water table. Imagine how glorious for nature (reed beds, newts, dragonflies and numerous creatures) it would be if the stream within EWR was opened up again. The relief on pressures caused by a piped system might even help to alleviate flooding in the area. A car park sloping downward toward the run of the stream certainly won't help, especially with all those water quenching roots removed.

The position of the track in the image below roughly charts the run of the spring fed rivulet. The view looks south, following the course of the stream which bends west (to the right in the image) and on to the the reservoir.

Image of EWR

3.2.5. Potential

EWR is so much already. It is a rich habitat of woodland, grassland and scrub and has a natural spring water system. It has a fair number of residents and visitors from the natural world. All of which depend upon it in one way or another at different times of the year. Owls and woodpeckers have not been heard from recently, but have been in the past, and we may well hear from them again. We have generations of foxes which control the rats. Some members of the local community may remember Half Tail. Her descendents live in EWR. Some local residents have told us how they regret, as children, hunting newts on EWR - that was decades ago when nature was just seeding the change on EWR - imagine the potential now. The capacity of EWR to restore nature and contribute toward improving biodiversity and stemming the decline of species abundance in the UK is huge.

EWR has the opportunity to offer so much to the local community too. Taking part in enhancing EWR itself would be an outdoor activity many would appreciate. A gated nature reserve enhanced by local people for their wildlife and their children could offer ecoservice opportunities for generations to come. Educational groups (including local primary schools), therapy and wellbeing groups, respite visits for the elderly, community group growing beds, all lead to a more cohesive society, all have long term benefits on economy via sustainability and prevention.

EWR has space for woodland footpaths, bird boxes, bat boxes, deadwood areas, insect hotels, hedgehog houses, scratch ponds, reed beds, benches, tables, growing beds, bird watching hides, additional tree species, further meadow creation, bulb glades, wild herb beds, and bee hives. It is a potential ecoservice wonderland.

Image of EWR

3.2.6. EWR and the Greater Picture

A coherent and resilient ecological network

Much of England's wildlife is now restricted to wildlife sites, which consist largely of semi-natural habitats. However, surviving in small, isolated sites is difficult for many species, especially in the longer term and given climate change. We want a large number of high quality sites which contain the range and area of habitats that species require. We also want ecological connections that allow species, or their genes, to move between these sites. For many species, habitat does not have to be a continuous, physical connection for them to disperse. An ecological network is this network of high quality sites, protected by buffer zones, and connected by wildlife corridors and smaller, but still wildlife-rich, "stepping-stone" sites.

The ecological networks for different species work at varying scales: some species need a large area, others a much smaller area. An ecological network for England therefore consists of a range of networks.

A **coherent** ecological network is one that has all the elements necessary to achieve its overall objectives; the components are complementary and mutually reinforcing so that the value of the whole network is greater than the sum of its parts. A **resilient** ecological network is one that can absorb, resist or recover from disturbances and damage caused by natural influences and human activities (including climate change), while continuing to meet its overall objectives of supporting biodiversity and providing ecosystem services.

Components of an ecological network. EWR a knuckle in the finger

Ecological networks generally have five components
.• **Core areas of high nature conservation value** which contain rare or important habitats or ecosystem services. They include protected wildlife sites and other semi-natural areas of high ecological quality.
• **Corridors and 'stepping stones'** enabling species to move between core areas. These can be made up of a number of small sites acting as 'stepping stones' or a mosaic of habitats that allows species to move and supports ecosystem functions.
• **Restoration areas**, where strategies are put in place to create high value areas (the 'core areas' of the future), restoring ecological functions and wildlife.
• **Buffer zones**, that protect core areas, restoration areas, and 'stepping stones' from adverse impacts in the wider environment.
• **Sustainable use areas**, areas of surrounding land that are managed in a sustainable and wildlife friendly way.

Biodiversity 2020, p19

3.3. EWR - The idea - Illustration

An ecoservice wonderland.

This illustrates the type of natural food sources, planting for nature, and community activities this space could offer. It would provide a multi-generational cohesive community space where people can learn from one another, share stories and skills and gain knowledge. Children and community groups and visitors can engage with nature in a space where nature and wildlife is protected and cared for.

The area of wildlife habitat which EWR comprises of is approximately 62,497ft2. If EWR is developed as per the submitted plan, approximately 46,845 ft2 will be entirely lost to development and what remains will be a diminished habitat in terms of biodiversity and providing a meaningful space for community and wildlife.

3.4. Summary of Points Raised in Part 3: *Ecology & Biodiversity*

State of Nature (See Chapter 3.0)

The 2023 State of Nature report shows that the abundance of species studied in the UK has declined by 19 per cent on average since records began in 1970. But while the most important natural habitats are in poor condition, work to protect landscapes has clear benefits for nature, people and climate. Neither distribution nor abundance can recover where suitable habitat or land to create suitable habitat is absent. Using data from the last fifty years to understand information and trends concerning wildlife species and habitat status, the national State of Nature report found: British Birds are in decline by 43% ; British Amphibians & Reptiles are in decline by 31% ; British Fungi and Lichen are in decline by 28% ; More than half of plant species have also declined, as have 59 per cent of mosses and liverworts (bryophytes). Pollinators such as bees and butterflies are among the worst-hit groups, falling by 18 per cent on average.

The decline in abundance of our wildlife is accelerating. Even comprehending this, after, arguably 3,500 years of British occupation since the Copper Age, is monumental. Now that the situation is recognised nationally (as well as globally) it is equally difficult to comprehend the lack of designation of such sites as EWR at local level. Only by starting at local levels can anything change. Already an existing refuge locally, with enhancement, EWR as it is now, offers real potential in contributing toward stemming these declines locally and nationally.

It is situated beside a gated reservoir, scope exists for the construction of additional scratch ponds, creation of reed beds, dead wood piles, the enhancement of woodland and much more. Exploring the feasibilities of opening up the natural spring water rivulet (open beyond the boundary to the reservoir) to create further natural habitat is another option that can be considered.

All elements of a habitat are important. On any level, nationally or locally, existing fungi and lichen, mosses and liverworts along with microbial habitat and soil writhing in insects, larva and eggs, can not be replaced by so called compensation measures presented by developers or the ecologists that they employ. Destroying habitat for car parks based upon ecology reports provided by developers which independently class the same woodland spots as of good quality in one report and poor quality in another removes the opportunity to improve and enhance them.

BNG (Biodiversity Net Gain) works somewhat toward stemming or compensating for the impact of mankind upon carbon levels and the Climate Emergency. However, the Biodiversity Emergency is not the same as the Climate Emergency and requires its own measures. Those measures should absolutely be **habitat driven**. By avoiding legally bound commitments to fall back on current legislation and policy relating to the Climate Emergency only is not only a break from duty, it is a cohesive retreat, a managed surrender, of what we have left. If you can imagine that Greater Manchester was once a patchwork of great woods, meadows, moors and heaths, with springs and streams and clear rivers (what we used to refer to as forest), you can imagine that the little areas we have left in urban zones are the last survivors of a great battle. They deserve pity and care, they need protecting and picking up.

Air quality and water are key elements for decision makers to consider in regard for the outline part of the application to build a car park upon EWR. Arguments concerned with those elements (arguments of

objection) cross-over with the subject of biodiversity but are covered in separate sections of this document. See Part 5: *Water, Drainage & Flooding*

In local, and as a result, national terms, in respect to biodiversity, as well as categorizing areas of a single site in terms of good, moderate and poor, ecologists should be dutifully and professionally bound to qualify any site's condition based upon a rank in respect to its local significance. The ecology reports provided by the developers in the case of the outline part of these plans fails to do that. If they did, as far as Edgeley is concerned, they would realise EWR ranks top! Number One! Sadly, the best and only wildlife habitat in the area. If they did, they would find that, as far as Edgeley is concerned, EWR is the best chance British wildlife has.

Part 3: *Ecology & Biodiversity* brings attention to legally binding commitments, government legislation, government guidelines, policy, strategies and acts.

Throughout the document the following are referred to regularly:

- The Environment Act 2021
- The National Planning Policy Framework (NPPF)
- The Convention of Biological Diversity (CBD)
- Recovering Nature: Our 25yr Plan to Improve the Environment
- Biodiversity 2020: A strategy for England's wildlife and ecosystem services
- The UK's National Biodiversity Strategy and Action Plan
- Greater Manchester Biodiversity Action Plan

Declarations and Commitments by Authorities (See Chapter 3.1.)

It should be understood by planners and decision makers that mitigation and compensation is **not** the same thing as protection, restoration and enhancement. Edgeley Wildlife Reserve Group believe that Stockport County Football Club's current outline plans in regard to mitigation and compensation do not benefit protection, restoration or enhancement of existing wildlife habitat.

Edgeley Wildlife Reserve Group is concerned that Stockport Metropolitan Borough Council do not recognize urbanisation/urban development as a driving factor behind loss of wildlife habitat. The council's website does not list it alongside pollution, intensive agriculture and climate change. By failing to provide accurate up-to-date data on wildlife and habitat loss which national and global frameworks rely upon; failing in mapping potential wildlife habitat to inform decisions; and failing to establish strategies and action plans to protect, restore and enhance nature, SMBC is failing to adhere to legally binding commitments.

Stockport is not immune to the effects of biodiversity crisis. The statistics are world-wide.

In England, the Environment Act 2021 includes legally binding targets for the government that will help the UK to meet its international commitments. These targets are discussed in terms of the National Planning Policy Framework and the Convention for Biological Diversity. Also discussed are national strategies and strategies which local government are obliged to implement. A reading of these strategies, policies and commitments along with the points raised throughout all parts of this objection document and information which it supplies (not considered adequately or at all by planning application documents) should enable decision makers to make the correct decision on the fate of EWR. That decision will impact directly upon our local and ultimately our national wildlife as well as the Edgeley community in regard to the benefits of access to Edgeley's only true natural space of any significance.

The Environment Act 2021, dictates that public authority which has any functions exercisable in relation to England must from time to time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the conservation and enhancement of biodiversity in England. **After that** consideration the authority must (unless it concludes there is no new action it can properly take), determine such policies and specific objectives as it considers appropriate for taking action to ***further*** conservation and enhancement of biodiversity in England and take such action as it considers appropriate, in the light of those policies and objectives, to further that objective.

Biodiversity 2020

Biodiversity 2020 is a strategy for England's wildlife and ecosystem services. It is published by The Department for Environment, Food and Rural Affairs (Defra).

The aims detailed in this government document draw upon international targets and agreements made as part of the Convention on Biological Diversity strategic plan for 2011-2020. Achieving these outcomes required a co-ordinated set of actions, many of which are aimed to deliver for more than one outcome. Reaching goals in the time-line set failed. The RSPB called it a 'lost decade for nature'. As a result the CBD set new interim targets which are regarded as critical. The United Kingdom has committed to these targets and is implementing them at local levels.

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.

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.

Biodiversity 2020: A strategy for England's wildlife and ecosystem services 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 wide scale 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.

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 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.

Government has prioritized calling for and implementing policies to deliver b**igger** wildlife habitats, increase the size of remaining areas of priority habitat where appropriate; m**ore** areas of priority habitat; and joining habitats by enhancing ecological connections and increasing opportunity for wildlife to move around the landscape by making use of 'stepping stones', 'corridors' and other features

EWR is indeed an area which is viable for consideration by local government as an area of natural habitat potential in regard to its ecological value in its own right. As well as perfectly meeting legally binding

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

Being situated adjacent to a green link existing on railway premises extending to the wider area (including to a site with the potential to be restored as a large core natural habitat area in Adswood) and the proximity to a reservoir, provides option for local government to examine a greater wide-spread ecosystem network according to the principles set out in creating NIAs.

Other, more local based, ecological initiatives can also be examined which will meet many of the same criteria that NIAs are based upon.

Priority habitats can be created and priority species can be introduced once designated and managed habitats are protected, restored and established. EWR could, for example, be an adoption site for introducing butterflies, dragonflies, great crested newts, encouraging red-listed species such as birds and bats as well as a range of flora and vegetation. There is also scope to open up the spring fed rivulet and plant reed beds.

The UK's National Biodiversity Strategy and Action Plan (UK BAP)

The UK Biodiversity Action Plan (UK BAP) was published in 1994, and was the UK Government's response to the Convention on Biological Diversity (CBD), which the UK signed up to in 1992 in Rio de Janeiro. The CBD called for the development and enforcement of national strategies and associated action plans to **identify, conserve and protect existing** biological diversity, and to enhance it wherever possible.

In 2024 a new *UK Biodiversity Framework* was published, following agreement of the Kunming-Montreal Global Biodiversity Framework (GBF) in December 2022. A key task set out in the framework was the production of the UK's National Biodiversity Strategy and Action Plan (NBSAP) to summarise targets and actions across the UK to meet the GBF.

Following COP15, the UK government set an aim to publish its National Biodiversity Strategy and Action Plan by May 2024, together with the devolved administrations, before COP16 in Colombia in October. However, the UK's action plan had not been submitted at the time of writing. In May 2024, in a debate on biodiversity loss in Parliament Caroline Lucas (Green) raised concerns that the UK's submission would be the existing Environmental Improvement Plan instead of a bespoke document.

The new Labour government has set **nature recovery as one of the five priorities** for the Department for Environment, Food and Rural Affairs (Defra). It has also stated that it intends to **honour international agreements on biodiversity** (*i.e.* the CBD) and that it will update the current Environmental Improvement Plan.

Commitments at Local Level

The Environment Act 2021 builds on existing legislation and strategies to provide a legislative basis for nature recovery as well as wider environmental priorities and governance. This includes giving powers

to the Secretary of State to set long-term, legally binding targets, for priority areas including biodiversity, together with a range of other measures to achieve nature recovery.

Greater Manchester Combined Authority (of which Stockport is part) recognised the Biodiversity Emergency and signed the Edinburgh Declaration (a UN-backed statement of intent committing to restore nature and reverse habitat loss) in 2022.

The Edinburgh Declaration argues for greater prominence to be given to the role of cities and local authorities in delivering the changes required. Greater Manchester Combined Authority has recognised:

Avoiding and minimising impacts upon wildlife habitat (especially where alternatives to planned developments can be effected) are options which local authorities within Greater Manchester are obliged to consider, and should, really, if they want to make any difference at all, be leaning toward.

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 level authority duty bound participation.

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

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

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 Greater Manchester Combined Authority (GMCA) of any such sites/areas existing within local boundaries.

According to Greater Manchester Combine 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

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.

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

Questions:

- Have DEFRA been approached to map this land according to variables covered in this document? Notably the historically recorded spring water stream and its ecological connection to the local reservoirs and the wider river system?
- Have GMEU been approached to survey this land according to variables covered in this document? Notably the historically recorded spring water stream and its ecological connection to the local reservoirs and the wider river system and the three identified habitats it is comprised of, two of them being principal habitat?
- Has a S*tate of Nature Report* been commissioned in order to ascertain the abundance of wildlife habitat in Edgeley?

<u>The Greater Manchester Biodiversity Action Plan (GM BAP)</u>

The Greater Manchester Biodiversity Action plan 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.

The ecological list of habitats is: Grassland; Hedgerows; Lowland mosslands; Reedbeds and bittern; Ponds and lodges; Canals; Native woodland; Uplands; and Urban managed greenspace.

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

Areas have been added to the GMBAP plan because they are considered to be of conservation concern locally within Greater Manchester. EWR should be entered into the GMBAP and/or The Local Nature Recovery Strategy in order to contribute to the recovery of Britain's wildlife and the conservation of wildlife habitat. 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. Stockport and its districts should already be making a count of suitable wildlife habitat

Areas Considered to be of Conservation Concern Locally

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-wildling) 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 feasibility 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.

Legally Binding Commitments - 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. This means that, as a public authority, Stockport Council must consider what it can do to conserve and enhance biodiversity. It must agree policies and specific objectives based on consideration. It must act to deliver policies and achieve objectives. Local councils must meet the biodiversity duty.

SMBC must have completed its first consideration of what action to take for biodiversity by 1st January 2024 and must agree policies and objectives as soon as possible after that date.

SMBC must check whether local nature recovery strategies, species conservation strategies and protected site strategies are effective in complying with biodiversity duty.

Questions

- Is the local nature recovery strategy even aware of EWR's position in regard to the outline part of the planning application (Ref: # DC/092211)?
- Is the local nature recovery strategy aware that EWR is the only reasonably sized area of wildlife habitat in Edgeley ward and is under threat of development?
- Does the local nature recovery strategy understand how the strategies being implemented by national government according to legally binding commitments relate to EWR?

Local nature recovery strategies must agree priorities for nature's recovery, map the most valuable existing areas for nature, and map specific proposals for creating or improving habitat for nature and wider environmental goals

The action SMBC takes for biodiversity will contribute to the achievement of national goals and targets on biodiversity. *The Environmental Improvement Plan* (EIP23), published in January 2023, sets out government plans for significantly improving the natural environment. By 2030, the government has committed to halting the decline in species abundance. By 2042, the government has committed to increasing species abundance by at least 10% from 2030, surpassing 2022 levels, restoring or creating at least 500,000 ha of a range of wildlife rich habitats, reducing the risk of species extinction, and restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term. SMBC can give priority to areas of high biodiversity value.

When involved with development plans and decisions SMBC should consider it's biodiversity duty when complying with requirements relating to strategic environmental assessments, environmental

impact assessments and habitats regulations assessments. In the case of the outline part of the planning application (Ref: # DC/092211) at pre-application phase, SMBC did not consider strategic or environmental impact assessments thoroughly enough, scoping out important aspects which clearly should not have been scoped out.

> *"Although no detailed ecological information has been submitted yet to the LPA in relation to the proposed development, when considering what information is available (and discussions during pre-app meetings) along with the criteria set out in Schedule 2 developments, significant ecological impacts associated with the proposed scheme following implementation of best practice mitigation measures and BNG offsetting would be considered unlikely."*
> **Subject: DC091614 EIA Scoping Opinion Request (Ecology Dept to Planning Dept)**

The Environment Act 2021 dictates that the biodiversity duty of local authorities means they should already be helping to conserve and enhance biodiversity on land they own or manage .

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.

Stockport's Biodiversity Action Plan

At the time of writing this document there is no local authority (Stockport) published dedicated biodiversity strategy or action plan to refer to other than the following statement found on the Stockport Council website. For some reason, on the website, Stockport has omitted **urbanisation, development and landscape change,** agreed universally as a/the major driving force in declining biodiversity and declining species abundance.

Local Nature Recovery Group (LNRG)

In expectation of developing a local nature recovery strategy in accordance with national legislation, in 2023, Stockport set up LNRG. No Local Nature Recovery Strategy has been published and no

minutes from the group's meetings are available. Stockport has **no viable or publicly visible** Local Nature Recovery Strategy or Biodiversity Action Plan Currently, Stockport must fall back upon the Greater Manchester Biodiversity Action Plan. Therefore, at this time, SMBC are duty bound to be agreeing priorities for nature's recovery, mapping the most valuable existing areas for nature and mapping **specific proposals for creating or improving habitat for nature** and wider environmental goals.

Strategies for Stockport should include and begin with a count. An inventory should be made of areas/districts/wards which have potential wildlife habitats and areas/districts/wards with a lack of wildlife habitat. The inventory, in consideration of community benefits (eco services) that such natural habitats have the potential to provide, should note areas of Stockport which are particularly deprived of access to natural greenspace / true wildlife habitat.

Following that, Stockport should examine the wider network and connectivity of existing designated and existing un designated sites capable of sustaining wildlife habitat with a view to protection, restoration and enhancement. By doing this, Stockport will be contributing toward legally binding targets and strategies which have been implemented at national levels and by Greater Manchester Combined Authority (GMCA).

Biodiversity – short for biological diversity – is in decline worldwide at an **unprecedented rate**, mainly due to urban development and climate change. Currently, 28 per cent of all species on Earth are threatened with extinction.

Stockport is not immune to these statistics. Nowhere is.

The council will not be able to make an informed decision on the outline part of this planning application (Ref: # DC/092211) without a working strategy subject to legally binding commitments on the subject of biodiversity.

The council will not be able to make an informed decision on the outline part of this planning application (Ref: # DC/092211) without an updated report on the state of nature in Stockport, or a count of wildlife habitat potential in Stockport subject to legally binding commitments on the subject of biodiversity.

This document by Edgeley Wildlife Reserve Group would like to bring to the attention of Stockport LNRG and SMBC in general, the existence of a viable site, the only such viable site in Edgeley, waiting for protection, restoration, and enhancement, according to the legally binding commitments explained in this document.

This site (viable as a local nature reserve) is under threat of development. The outline part of this planning application (Ref: # DC/092211) will remove the only existing such site permanently from the Edgeley community.

The Local Plan

Stockport's Local Plan is not a dedicated biodiversity strategy but a guideline for the development and management of Stockport in general. Edgeley Wildlife Reserve Group were told by a local councillor that *The Local Plan* is under draft. We were advised that we would have to wait for the new draft to

be published as basing our representation, objections and suggestions (as a local community organisation) on the out-of-date existing plan would be inadequate.

Edgeley Wildlife Reserve Group have had three weeks to examine 140 plus documents relevant to the planning application in question, some of which consist of over 100 pages, and have been told that the existing Local Plan is useless in reference.

We have been informed and understand that (at the time of writing this document) Stockport Council are currently re-writing a new draft of *The Local Plan* and that the context of the new draft yet to be published will be the basis of direction for the council in making decisions on matters concerning development.

The council will not be able to make an informed decision on the outline part of this planning application (Ref: # DC/092211) without a working strategy subject to legally binding commitments on the subject of biodiversity.

The council will not be able to make an informed decision on the outline part of this planning application (Ref: # DC/092211) without an updated report on the state of nature in Stockport, or a count of sites of wildlife habitat potential in Stockport as subject to legally binding commitments on the subject of strategies, targets and goals to stem the decline of biodiversity.

Lack of Local Plan, Lack of Local Nature Recovery Strategy, Lack of Biodiversity Action Plan

How can the public (local communities) form opposition, objections, arguments, inform relevant bodies, or present points in representation of a biodiversity crisis without a valid publicly available reference, especially (as in this case) in view of timescales allowed for objections, with no active Biodiversity Action Plan to refer to?

How can the council grant a decision in the favour of the outline part of this planning application (Ref: # DC/092211) without a valid publicly available reference, especially (as in this case) in view of timescales allowed for objections, with no active Local Plan, Nature Recovery Strategy, or Biodiversity Action Plan to refer to.

Edgeley Wildlife Reserve Group, therefore, request a postponement to any decision regarding the outline part of the planning application (subject of this document) while Stockport's position (in regard to strategies to meet legally binding commitments and targets in relation to the declared biodiversity crisis) is reviewed and strategies are published.

Stockport, Commitments, Strategy and Policy and EWR (See Section 3.1.3 & 3.1.4.)

Without locally based calculations and acquired/collected data and mapping to demonstrate an understanding of loss (or gain) of habitat or to assess (with data) the state of wildlife habitat (existing and potential) and in view of a lack of a LNRS or Biodiversity Action Plan and pursuant of legally binding commitments related to a declared biodiversity emergency; Stockport Council are duty bound to recognize that the plans to develop or use for development (Ref #: DC/092211) the land in question (EWR) should not be authorized.
If calculations, acquired/collected data to demonstrate an understanding of loss (or gain) of habitat or assessments (with data) of the state of wildlife habitat (existing and potential) have been undertaken by Stockport Council then they should be provided by Stockport Council to the Committee(s) convened to make decisions on the outline part of the planning application (Ref #: DC/092211) in regard to proposed development of the land in question and/or in regard to access, changes to the land in question for the purpose of any planned development in relation to (Ref #: DC/092211).

The Greater Manchester Biodiversity Action plan (GM BAP) aims to promote the conservation, protection and enhancement of biological diversity in Greater Manchester for current and future generations. With duty toward legally binding commitments, Greater Manchester Combined Authority is concerned with identifying species and habitats that are of local conservation importance and require action in order to conserve and protect them.

Stockport has **no viable or publicly visible** Local Nature Recovery Strategy or Biodiversity Action Plan. Currently, Stockport must fall back upon the Greater Manchester Biodiversity Action Plan (GMAP) One of the selection criteria listed by GMAP is that habitats are considered to be of conservation concern locally within Greater Manchester. Stockport Metropolitan Borough Council are duty bound to be agreeing priorities for nature's recovery, mapping the most valuable existing areas for nature, and mapping specific proposals for creating or improving habitat for nature and wider environmental goals.

Strategies for Stockport should include and begin with a count. An inventory should be made of areas which are potential wildlife habitats, potential urban nature reserves, and areas/districts with a lack of wildlife habitats. The inventory; in consideration of community benefits (ecoservices) that such natural habitats have the potential to provide - not least in terms of health, wellbeing and education (See Part 4: *Community, Health & Education*) - should note areas of Stockport which are particularly deprived of access to meaningful (in size) areas of natural greenspace/wildlife habitat.

Following that, Stockport should examine the wider network and connectivity of existing designated and existing undesignated sites capable of sustaining wildlife habitat with a view to protection, restoration and enhancement. By doing this, Stockport will be contributing toward legally bound targets and strategies which have been implemented at national levels and by Greater Manchester Combined Authority (GMCA). By doing this, Stockport will be contributing toward strategies which have been implemented at national levels to create a wider biodiversity network in accordance with the aims of Defra.

Stockport Schools (see 3.1.4.g. & Part 4: Community, Health & Education)

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.

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' allow building on green spaces and 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 (Ref #: DC/092211) and justify such plans under the auspiciousness of *improving* the environmental value of Edgeley?

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 the planning application (Ref: # DC/092211) and in regard to the wider legally binding commitments aimed at protecting and improving biodiversity.

(Also See Part 4: *Community, Health and Education*)

The Need for Nature in Edgeley (see 3.1.4.f. & 3.1.4.h)

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 spaces. This requires the identification of true natural spaces and the preservation, protection, designation and sometimes enhancement of true natural spaces, especially in urban environments. The presence of and access to natural space is an essential factor contributing to a healthy society.

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 forever.

Sustainable solutions would include protecting and enhancing natural environment and true natural spaces according to legally binding commitments and not mitigating or compensating for their destruction. Local circumstances in Edgeley dictate a need for access to true natural green space (as opposed to managed open parks for human recreation) and such spaces should be protected and their value understood.

The promotion of a sustainable pattern of development would make allowances for areas of true natural space where areas of natural space 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(s) 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.

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. Conservation should be considered in terms of water infrastructure as well as in ecological terms. Conservation, especially in designated conservation areas where cellars of streets running parallel with reservoirs and other local streets are subject to serious flooding should consider local water tables and identify the effect of the removal of woodland and vegetation (roots) on water tables.

Local plans and spatial development strategies should assess that Edgeley is deprived of access to true natural space and wildlife habitat. The outline part of the planning application (Ref: # DC/092211 - development of a car park to the south) involves permanently removing the last reasonably sized 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 in question would involve convincing, encouraging or incentives for use of public transport for an average perceived figure of only 150-200 out of a perceived 19,750 people.

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.

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 areas 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 other activities 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) they 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.

See Part 4: (*Community, Health & Education*)

Edgeley is built up urban land. For the purpose of this representation, those significant parts which are not have been divided into categories.

These are: Managed parks (primarily serving as amenities for human recreation) with heavy footfall and regular management. They are marked in salmon pink on the map. Private parks with heavy footfall and regular management. They are marked in lighter green on the map. Unmanaged, enclosed (or private) natural or rewilding or rewilded areas with restricted access. These are our areas which have the best suitability for wildlife. They are marked dark green on the map. There are also some very small wooded areas with open access to the public which suffer regular human intrusion, litter and damage and can be prone to anti-social behaviour, *etc.* These areas are not deemed as suitable for wildlife. They are marked yellow green on the map. Suitability for wildlife refers to relatively safe and secure hunting, foraging and nesting space - with emphasis on space, security and a natural provision for native species.

The presence of birds alone is not an indicator of suitable wildlife habitat. You may have noticed that the birds you see in your gardens or in the trees in your streets, even in the parks, more often than not do not actually live in your gardens or in the trees in your streets. And, though some small areas of parks may offer limited support for bird nesting, you'll struggle to find their nests and their night shelters in the parks.

Parks by their nature are human recreation spaces and although there has been increasing fore-thought for providing small wild zones in them over recent years, generally speaking, parks are heavily managed areas of land under continuous disturbance, development and constant human activity. They are regularly subject to noise, light, roaming dogs and antisocial behaviour. Something made evident recently when an attempt was made to set fire to perhaps one of the most suitable areas for nesting wildlife in Edgeley park .

Alexandra Park is a beautiful and fantastic place. A credit to those who maintain it. It, along with other community based programs such as Grow Edgeley and Friends of Alexandra Park, are a massive benefit to wildlife in many ways. But human recreation areas cannot be categorized as adequate sanctuaries for wildlife.

The two private angling clubs, on Reservoirs 1 & 2, Gosjacs and EPAC (now merged) offer fantastic habitat for aquatic life. They are fenced off and require membership to enter. They care a great deal for the wildlife and have already stated their support for the proposal of a wildlife reserve upon EWR. The work that these two clubs have done over the years to create and maintain an ecosystem for aquatic life is immense.

In regard to secure and natural space for wildlife, the problem with these two enclosed areas (Reservoirs 1 & 2) is that they are surrounded by only a thin strip of dry land which accommodates the human access points to the reservoirs. Thus, once again, support by way of secure habitat for non aquatic birds and mammals is very limited.

In Edgeley, that leaves us with only three areas of meaningful space which can, as things stand, be deemed as having the capability to support and protect wildlife. Two of them are small sections of inaccessible steep bank woodland behind Larkhill Road overlooking Stockport Audi. The third is the only one of them of any meaningful degree in respect to size and the only one offering accessibility. That area, situated at the end of Moscow Road East next to reservoir #1, is the subject of this document and is referred to as *EWR*.

Situated outside of Edgeley to the west (within the old Edgeley ward boundary) is a similar area. That exists in the immediate vicinity, most of it on the actual premises of, the sewage works. What a testimony of our devotion to our natural heritage that is. That the descendents of the creatures we shared this land with for three and a half thousand years are forced to resort to living among the stench of our sewage.

Edgeley ward now consists of approximately 571 acres. Of those 571 acres, as things are, only 3.57 acres are capable of providing secure and safe space to wildlife in terms of habitat areas.
In percentage, that means that 99.3% of the surface area of Edgeley is incapable of supporting wildlife habitat to any consistent, self sustainable or meaningful degree. Without the land we are making a case for today, it would be less … and all that remains would be situated outside of Edgeley ward among the sewage works.

EWR as a Nature Reserve (See 3.1.4.i.)

The area subject to the outline part of the planning application (Ref: # DC/092211) is the most valuable in Edgeley in terms of environmental value and in terms of potential for establishing a basis for ecoservices related to health and wellbeing and education.

The lone representation of EWR as viable habitat in the context of the local area considered in context of legally binding commitments to recover nature and improve biodiversity at local and community levels needs to be considered.

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 National Planning Policy Framework 2023, The Environment Act, and legally binding commitments toward biodiversity in regard to ecology, habitat and local communities, EWR should be considered as an asset warranting protection. See Section 3.1.

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 accessible 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.

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 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.

EWR is comprised of woodland, grassland habitat, and scrub. As a whole area it is of a scope and size which cannot be replaced locally. Compensation strategies published by the planning application (Ref: # DC/092211) and in relation to the outline part are too fragmented and piecemeal and exist of areas too small or narrow to be considered viable solutions in terms of habitat compensation. 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 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.

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.

EWR and Green Corridors

In today's urbanised world, green corridors are an essential aspect of nature's survival. Green corridors provide a network of communication for many species, often linking habitat areas to each other. Sadly, it is increasingly becoming the case (especially in highly concentrated urban areas) that the corridors themselves are the only habitat and home that wildlife has to rely upon. Many of them exist as railway embankments. Thankfully, Network Rail take their duty to wildlife and the biodiversity crisis very seriously and contribute toward maintaining these corridors for wildlife.

There are national strategies in place aimed at designating, creating and maintaining green corridors. It is an ongoing process and not all corridors are identified or designated. Not only birds and mammals rely upon green corridors. Amphibians and insects (the basic building blocks of the food chain) and important pollinators also rely upon them.

All bodies and authorities concerned with the state of nature in the UK are fully aware of the importance of green corridors.

EWR is situated upon a green corridor and is an important link between outlying habitats to the south and the reservoirs. The image below illustrates the position of EWR in relation to a green corridor.

The location of EWR as as a nature reserve and a knuckle in a green corridor serving the reservoir area means it is essential to the wildlife we experience in Edgeley. EWR's position adjoining the railway premises means it is in fact the most valuable link to the ecology of the reservoir area and Alexandra Park.

This should contrast sharply with the images utilised by the ecological surveys provided as part of the outline planning application.

EWR is an extraordinary space in our community. On hot days, the mature trees provide a cool shaded area in which to stand and enjoy urban nature at its best. EWR is often alive with the sound of birds and the buzzing of bees and other insects, including dragonflies. If you catch the right dawn and stand by the railings you will hear a dawn chorus that will blow your mind.

The sound of the wind in the trees and in the long grasses by the footpath can stimulate the senses unlike most other parts of Edgeley. The bats flying overhead as you walk past are not vampire bats. No need to be afraid. They just love those bugs which *are* the vampires.

The site is crawling with insects and serves as an important larder and link in the food chain for wildlife not just on site but on the neighbouring reservoir and Alexandra Park. A natural spring fed rivulet runs through EWR under the ground intrinsically linking this site with the reservoirs and thereafter the wider river system.

Pursuant of legally binding targets aimed at improving biodiversity, stemming habitat loss and addressing the demise of species abundance, Defra and Natural England put huge emphasis on Coherent Ecological Networks.

To the south of Edgeley, beyond Adswood, is the potential to create a core habitat country wildlife park which would offer Stockport great future employment and economic opportunities.

That is the subject of another document.

EWR - In More Detail (See Chapter 3.2.)

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Habitat

Ecologists have categorised the habitats at EWR as Broadleaf Woodland, Grassland and Scrub. Each type of habitat offer different ecological aspects to an area. Each sub-habitat contributes to the richness of an area as a whole. Different creatures which depend on or use whole areas will utilize aspects of each sub-system. Birds, for example, may consume berries from the scrub, insects from the woodland and use fibres from the grasses to make nests. Each part of an area's habitat is important to the ecosystem for varying reasons and each part often important to the other. Variations of habitat offer variations of food, shelter, security and nesting for a variety of wildlife.

Woodland

In spring, 2023, 77 trees of thirteen various types were counted across the whole area of EWR. Only mature and young established trees were counted. Apart from the Scots Pine and the Yew, saplings or trees of less than 7ft in height (of which there are many) were not counted. The TEP survey counted a total of 280 trees in EWR. Although not ancient, new or secondary woods are still important. Secondary woods and individual trees offer many species of wildlife a home and are important to people and culture in all sorts of ways.

A great deal of undergrowth (mainly brambles) which offers immense protection to insects, birds and mammals is situated central to the area.

Grassland

From woodland glades and wildflower meadows, to pasture and sports fields, grassland covers large areas of the UK. They can be diverse wildlife havens and many have developed from human activities.

On the eastern edge, parallel to the footpath and either side of where the spring fed rivulet runs underground (seen in the image below where the track is), grassland offers tall grasses and a variety of pollen and nectar rich wildflowers at various times of the year. Sometimes full of colour and the buzzing of bees and hoverflies.

Grasslands are areas dominated by grass cover, but they can also contain lots of other plants. Grasslands cover large areas of the UK, but most are highly modified by land management and agricultural 'improvement'. Semi-natural grasslands **are very scarce**, and some wooded areas contain important pockets of semi-natural grasslands within glades, rides, wood-meadows and clearings.

Scrub

A great deal of undergrowth (mainly brambles) which offers immense protection to insects, birds and mammals is situated central to the area. Bramble flowers are a food source for honey bees and bumblebees and other wild animals. Leaves are eaten by certain caterpillars as well as some grazing mammals, especially deer. Ripe berries are eaten and their seeds dispersed by several mammals such as fox and badger, and small birds. Bramble is also a habitat for some animals, including grass snakes.

Scrub, Indigenous Culture and Bioservice:

The pastime of blackberry picking (blackberrying) goes back thousands of years and is still popular. Ripe juicy blackberries have high vitamin C content and can be eaten raw or cooked. You can add them to pies, crumbles, wines, jams, jellies and vinegar. Strong ale brewed from blackberries, malt and hops was popular in the 18th and 19th centuries. It's been widely been used in traditional medicine for its healing and detoxifying properties and fibres from its stems have even been used to make string. Blackberry bushes can prevent soil erosion on infertile, disturbed sites and the ancient Britons used thorny stems as a boundary or barrier in the way we use barbed wire

Scrub and Wildlife:

Brambles protect the nesting birds we love to see and hear, including thrushes, robins, long-tailed tits, finches and warblers. They also provide shelter for shy or threatened species found in quiet places, such as the woodcock, which hides at ground level, and dormice, which climb and nest among the stems. Although blackberry plants swamp other species, they are a part of successional woodland growth, protecting saplings from grazing animals so they can grow up and succeed them.

Bramble flowers are open, prolific and generous suppliers of pollen and nectar for insects – from bees, wasps and hoverflies to beetles and butterflies. Meadow Brown, Speckled Wood, Comma, Silver-washed Fritillary, Gatekeeper, Ringlet and Small Skipper are among the butterflies I've seen amongst bramble. The berries form an important food for creatures great and small – from foxes, badgers and small mammals like wood mice and rare dormice to birds and insects.

The leaves are food for wildlife as well. Buff Arches, Peach Blossom and Fox moth (cuckoo food) caterpillars are amongst the many moth larvae that eat them, not to mention many fly and beetle

larvae. You will see many spiders on brambles catching flies. We can use the youngest leaves in salads, apparently, as well as using the fruits in delicious jams and puddings. Brambles are used in traditional medicines, too. We can use the whole plant as a protective fence or hedge component to keep large animal and human intruders out.

Flora

The following plants have all been identified on EWR in the year 2023 and 2024. Many of them exist in the grassland habitat (mini-meadow) through which (the now underground) spring fed rivulet runs.

Bindweed, Bluebells, Bracken, Bramble, Buddleia, Buttercup, Camomile, Cocksfoot, Coltsfoot, Common Plantain, Daffodils, Dandelion, Dock, False Oat Grass, Fern, Field Clover, Forget-Me-Nots, Foxglove, Gooseberry, Greater Willowherb, Hemp Agrimony, Ivy, Lesser Willow Herb, Nettle, Nipplewort, Ragwort, Raspberry, Red Shank, Sedge Grasses, Spear Thistle, Sticky Willy, Sweet White Clover, Sweet Yellow Clover, Thistle (various), Tufted Vetch, Welsh Poppy, Yorkshire Fog.

Fauna

EWR is a rare green jewel offering sanctuary to wildlife amongst many acres of urban built-up land. This 1.5 acre parcel of land is special because for over 50 years it has been left virtually shut off from human disturbance and interference and as a result nature has very successfully reclaimed it for herself.

Managed Parks or Human Recreational Areas like Alexandra Park and Edgeley Park, whilst beautiful and immensely helpful for human mental health and well-being, cannot be categorised as sanctuaries for wildlife in the same way as EWR. In percentage terms, less than 4% of the entire surface area of Edgeley is capable of supporting wildlife habitat to any consistent, self-sustainable or meaningful degree and here it is.

Now covered in years' worth of soil build-up, brambles, woodland and grassland, EWR provides fantastic habitat. The whole site is teeming with invertebrates (worms, slugs, beetles, insects, spiders, butterflies, moths, centipedes and millipedes) it has them all in unprecedented numbers. The security afforded by being fenced off, and the brambles and shrubs, along with all the invertebrates and trees, has made EWR special to Edgeley.

The fenced off nature of EWR has provided a constant safe refuge to foxes who have their den there and raise fox cubs to the delight of Edgeley residents when the cubs stumble through the fence and totter off down Moscow Road East or play in neighbourhood gardens.

Foxes, toads, hedgehogs, rats, birds, an occasional badger, moths, butterflies and a myriad of insects including dragonflies have and still can be experienced in EWR. Bats, both Pipistrelle and Noctule can be seen feeding above EWR late in the evening. Local people remember newts and a badger which

used the railway premises as a corridor. Foxes are a regular sight, having a number of dens against the northern bank within EWR and help to control the local rat population.

Imagine if the area were developed, where would the rats go? What if there were no foxes there to hunt them? We all remember the swarms of rats (in broad daylight) disturbed during the construction of the Cheadle End. One local lady on Finland Road recalls seeing swarms of them running through local streets. They got into the walls of her house and ate the electric wires, causing thousands of pounds of damage.

Birds

The area is home to many birds and attracts others - some that nest there and others that fly in-and-out looking for invertebrates to macerate to feed their young or for materials from among the many grasses and wildflowers to line their nests.

A Bird Survey conducted looking over EWR perimeter fence over 10 days (45 mins every morning) in March 2023, revealed by sight or assisted with binoculars that at that time 14 different species either lived there or were foraging for food or nest materials.

Regularly spotted, were: Blackbirds, Blue tits, Collared Doves, Crows, Great tits, House Sparrows, Long-tailed tits, Magpies , Robins, Woodpigeons and Wren.

House sparrows are of particular interest as they are listed on the Red List in the Birds of Conservation Concern 5 (2021). *i.e.* of most concern. Worryingly, the Red List now accounts for more than one-quarter (29%) of UK species, more than ever before. Amongst the new additions to the Red List is the Swift. A swift was seen flying directly over EWR in July 2024.

The robins, blackbirds, great tits, long tailed tits, woodpigeons and wrens are always most visible, appearing to have generations nesting there every year. Of wonder in spring was the daily sighting of the long-tailed tits gathering spiders' cobwebs off the car wing mirrors along Moscow Road East and flying back up high into the trees in EWR to make their cobweb pouch nests suspended against the tree bark.

Two other birds spotted are of particular interest in as much as they are listed as Section 41 in the Birds of Conservation Concern 5 (2021). Namely: Dunnock and Bullfinches.

Bullfinches are thinly distributed across the UK and are rarely spotted as there are only 265,000 breeding pairs in the country. They enjoy scrubby areas of bramble undergrowth near woodland edge, orchards, hedgerows and even parks and gardens. They feed on buds, berries, seeds, and particularly enjoy macerated insects to feed their young. There is a strong possibility that bullfinches might nest in the brambles in EWR as they have been spotted numerous times by residents of Moscow Road East since March 2023. The dunnock may also nest here as its preferred habit is vegetated areas with scrub and likes to nest close to the ground in hawthorn or brambles. The wren likes to feed in the brambles on the plentiful insects and spiders. The house sparrows were incredibly busy in March 2023 flying in and out of EWR with beaks full of grasses, returning to the rafters of our terrace houses to build their nests. They similarly need to fee their young on macerated invertebrates.

Unusually, in 2010/11 a tribe of magpies numbering over thirty gathered in two of the maturer trees along the edge of EWR before dispersing suddenly in the winter of 2012. A family of pied wagtails used

the area for years but have not been seen for the last three or four. In 2023 a Nuthatch was spotted walking upside down clinging to a thick stem of a large tree and since the introduction of the Merlin App (on mobile phones) that recognises bird song Blackcaps and Chiffchaffs have been recorded in EWR. In fact, it is obvious (by their calls) that chiffchaffs have moved into nest there this year (2024).

It is clear that many birds live in EWR whilst others just pop in and out to use it as a larder to supplement their dietary intake also finding it a useful wild place to source nesting material in the

spring. How wonderful it is for residents of Edgeley to live in such close proximity to this beautiful oasis in an urban sprawl. The unique combination of having the parks alongside three bodies of water and a rewilded fenced-off parcel of land (EWR) bursting with insect life and berries and other resources combines to directly enhance and support all the wildlife activity we see.

The reservoirs also support a lot of other bird life as well as Mallards, Coots, Moorhens and Canada Geese. We often have Cormorants and Herons too. In the summertime Kingfishers visit and every November approximately 20 Goosanders fly in from Scandinavia making their home on the reservoir for five months before flying back in the springtime.

Whilst these aquatic birds do not generally frequent EWR, neither to forage nor nest (with the exception of the herons who have nested high up in EWR trees and the occasional lone Canada Goose looking for lost chicks) we fully understand to what extent the impact of loosing EWR's part in the local ecosystem will have on the biodiversity of all the reservoirs.

Pipistrelle Bats are commonly seen at dusk flying up and down Moscow Road and Moscow Road East, as well as flying low across the reservoirs and around EWR. This is the ideal habitat for them as they consume up to 3,000 insects per night consisting of: aquatic-flies, mosquitos, midges and other invertebrates such as moths. The reservoirs provide the aquatic-flies and EWR the invertebrates in plentiful amounts. Pipistrelle Bats enjoy urban areas and like to roost in trees, and also in between old roof tiles of the 120 year old terrace houses in the conservation area around the reservoirs.

Noctule Bats are the UK's largest bats. They can be seen flying higher than the Pipistrelles over the Edgeley Reservoirs and EWR. The Noctule Bats can be seen earlier than dusk in the summer months. They enjoy a diet of moths, beetles, mayflies and flying ants. Sadly, populations of Noctule Bats have declined greatly in the last few decades, due to a loss of habitat. This is a consequence of urban development which has resulted in the loss of mature trees used for nesting and hibernation. The Noctule bat is a priority species in the UK's Biodiversity Action Plan. It is also protected in the UK under the Wildlife and Countryside Act 1981.

Foxes

Not only is it a joy to see the fox cubs in the summer and hear the vixens calling for a mate, telling you it's nearing the end of the winter, but they also provide a great service in the ecology of the reservoirs helping to keep a natural balance. With so little natural wild habitat urban foxes primarily scavenge for food but given the chance they will hunt for small mammals such as rats and mice, helping to keep rodent numbers under control. At times there are many rats around the reservoirs and given that expert ecologists are undecided for sure whether we in urban areas

live 6ft, 10ft or 15ft away from a rat, it can only be a good thing to have resident foxes in EWR that patrol up and down the streets and around the reservoirs most nights. Not only do they assist in keeping rat populations down but foxes will take the opportunity to seize Canada Goose eggs and young, keeping in check their rapidly breeding numbers.

This 1.5 acres parcel of land is acting as a vital lifeline to many urban wildlife creatures. To needlessly take it away to create yet another car park in such a large urban area will deny foxes a home. They have lived amongst us for so long and played their part around the reservoirs in keeping rat populations down and given such delight. To partially take some land and leave a bit will still render the whole site almost useless as foxes will not want to live so close to human disturbance. EWR provides security to raise cubs and gaining access to the Rail Line embankment opens-up miles of green corridors for the foxes to forage in and keep their population healthy.

Edgeley Reservoirs were placed here because there are natural fine white sand springs with rivulets under EWR making it an ideal home for city wildlife. This rare green jewel with rivulets of water, mature trees, grasses, scrub and beautiful flora, acts as a haven and place of shelter to wildlife. The plentiful invertebrates and blackberry brambles make it like a fantastic larder for nature and a secure home for many birds, mammals and amphibians. It is a **RARITY** in the grey dull urban sprawl! It is a green jewel, a true treasure of Edgeley.

Birds known to have utilized EWR directly (including outside of survey period March 2023):

Black Headed Gull, Blackbird, Blackcap, Blue tit, Bullfinch, Canada Goose, Chiffchaff, Coal tit, Collared Dove, Crow, Dunnock, Gold Crest, Goldfinch, Great tit, Grey Wagtail, House sparrow, Little Owl, Long tailed tit, Magpie, Meadow Pipit, Nuthatch, Pied wagtail, Robin, Rock Dove, Song Thrush, Sparrow-hawk, Swifts, Woodpigeon, Wren

Kingfisher (not in EWR but within 20m)
It is also believed Starlings use the grassland area in winter to feed.

Most Threatened

In England many of our rarest and most threatened species are listed under Section 41 (S41) of the 2006 Natural Environment and Rural Communities (NERC) Act. Outcome 3 of the Government's Biodiversity 2020 strategy contains an ambition to ensure that 'By 2020, we will see an overall improvement in the status of our wildlife and will have prevented further human-induced extinctions of known threatened species.' Protecting and enhancing England's S41 species is key to delivering this outcome.

Bullfinch, Dunnock, House Sparrow, Herring Gull, Song Thrush

<u>Water</u>

According to historical record, a natural spring fed rivulet runs through EWR. It is now piped underground through EWR and is joined by rainwater runoff from the railway premises. The rivulet emerges again as it enters the reservoir area. This little stream is essential to the ecosystem of the reservoirs and the wider river system. The pressure created by its piped state during heavy rainfall could even be contributing to

flooding further along on Dale Street. A local man connected with Gosjaks remembers when the spring fed stream ran openly through EWR.

Water Table

Historical record suggests that the whole site (possibly including the stadium itself) exists upon fine white sand springs. The presence of fine sand springs would also suggest that there is a deep clay bed below upon which the water table sits. Houses south of EWR suffer flooding to the cellars due to the water table. Imagine how glorious for nature (reed beds, newts, dragonflies and numerous creatures) it would be if the stream within EWR was opened up again. The relief on pressures caused by a piped system might even help to alleviate flooding in the area. A car park sloping downward toward the run of the stream certainly won't help, especially with all those water quenching roots removed.

Potential

EWR is so much already. It is a rich habitat of woodland, grassland and scrub and has a natural spring water system. It has a fair number of residents and visitors from the natural world. All of which depend upon it in one way or another at different times of the year. Owls and woodpeckers have not been heard from recently, but have been in the past, and we may well hear from them again. We have generations of foxes which control the rats. Some members of the local community may remember Half Tail. Her descendents live in EWR. Some local residents have told us how they regret, as children, hunting newts on EWR - that was decades ago when nature was just seeding the change on EWR - imagine the potential now. The capacity of EWR to restore nature and contribute toward improving biodiversity and stemming the decline of species abundance in the UK is huge.

EWR has the opportunity to offer so much to the local community too. Taking part in enhancing EWR itself would be an outdoor activity many would appreciate. A gated nature reserve enhanced by local people for their wildlife and their children could offer ecoservice opportunities for generations to come. Educational groups (including local primary schools), therapy and wellbeing groups, respite visits for the elderly, community group growing beds, all lead to a more cohesive society, all have long term benefits on economy via sustainability and prevention.

EWR has space for woodland footpaths, bird boxes, bat boxes, deadwood areas, insect hotels, hedgehog houses, scratch ponds, reed beds, benches, tables, growing beds, bird watching hides, additional tree species, further meadow creation, bulb glades, wild herb beds, and bee hives. It is a potential ecoservice wonderland.

EWR and the Greater Picture

A coherent and resilient ecological network

Much of England's wildlife is now restricted to wildlife sites, which consist largely of semi-natural habitats. However, surviving in small, isolated sites is difficult for many species, especially in the longer term and given climate change. We want a large number of high

quality sites which contain the range and area of habitats that species require. We also want ecological connections that allow species, or their genes, to move between these sites. For many species, habitat does not have to be a continuous, physical connection for them to disperse. An ecological network is this network of high quality sites, protected by buffer zones, and connected by wildlife corridors and smaller, but still wildlife-rich, "stepping-stone" sites.

The ecological networks for different species work at varying scales: some species need a large area, others a much smaller area. An ecological network for England therefore consists of a range of networks.

A **coherent** ecological network is one that has all the elements necessary to achieve its overall objectives; the components are complementary and mutually reinforcing so that the value of the whole network is greater than the sum of its parts. A **resilient** ecological network is one that can absorb, resist or recover from disturbances and damage caused by natural influences and human activities (including climate change), while continuing to meet its overall objectives of supporting biodiversity and providing ecosystem services.

Components of an ecological network. EWR a knuckle in the finger

Ecological networks generally have five components
.• **Core areas of high nature conservation value** which contain rare or important habitats or ecosystem services. They include protected wildlife sites and other semi-natural areas of high ecological quality.
• **Corridors and 'stepping stones'** enabling species to move between core areas. These can be made up of a number of small sites acting as 'stepping stones' or a mosaic of habitats that allows species to move and supports ecosystem functions.
• **Restoration areas**, where strategies are put in place to create high value areas (the 'core areas' of the future), restoring ecological functions and wildlife.
• **Buffer zones**, that protect core areas, restoration areas, and 'stepping stones' from adverse impacts in the wider environment.
• **Sustainable use areas**, areas of surrounding land that are managed in a sustainable and wildlife friendly way.

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EWR - The Idea - Illustration

An ecoservice wonderland.

This illustrates the type of natural food sources, planting for nature, and community activities this space could offer. It would provide a multi-generational cohesive community space where people can learn from one another, share stories and skills and gain knowledge. Children and community groups and visitors can engage with nature in a space where nature and wildlife is protected and cared for.

The area of wildlife habitat which EWR comprises of is approximately 62,497ft2. If EWR is developed as per the submitted plan, approximately 46,845 ft2 will be entirely lost to development and what remains will be a diminished habitat in terms of biodiversity and providing a meaningful space for community and wildlife.

Targets Government is Legally Committed To and Planning Application DC/092211

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

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

Edgeley is an area deprived of access to natural habitat. 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.

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.

A United Nations report into *Nature's Dangerous Decline* established that *'current global responses were insufficient'*; that '*transformative changes are needed to restore and protect nature'*; and that *'opposition from vested interests can be overcome for public good'*. This means that action at **local level i**s necessary to effect changes to our planet's **overwhelmed biodiversity.** Ratified by 196 countries, the CBD is an international treaty for the conservation of biological diversity. The CBD was agreed in 1992 and has seen nearly every country in the world become a party to it. The UK brought the CBD into force in 1993. This put the UK government under a **legal obligation to protect biodiversity** in its territories.

The GBF contains four overarching goals and 23 targets. The four goals set out a vision for biodiversity by 2050 are to:

- 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.

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

- Share the monetary and non-monetary benefits of the utilisation of genetic resources, digital sequence information on genetic resources, and traditional knowledge associated with genetic resources with Indigenous people and local communities. Additionally, ensure traditional knowledge associated with genetic resources is appropriately protected.

- Ensure all parties (specifically developing countries) have adequate means to implement the GBF. This includes financial resources, capacity building, technical and scientific cooperation, and access to technology.

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

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 it's *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**

- Ensuring the $700 billion per year in funding, mainly from richer to less developed countries, needed to reverse biodiversity loss

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. 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 opportunities which would come of protecting and restoring EWR would also be lost. These, human orientated benefits are covered in Part 4: *Community, Health & Education*.

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. Part 4 of this document (*Community, Health & Education)* provides various arguments as to why EWR should be considered valuable habitat for the prosperity of humans, locally and nationally.

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 area in Edgeley, that can be truly considered as offering the potential to enhance wildlife habitat on any meaningful scale. Edgeley is not only deprived economically but access to 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.**

The difficulties in addressing biodiversity loss were reflected in the UK's 2019 report on progress. It found that the UK had only fully met five of the 20 targets. The Royal Society for the Protection of Birds (RSPB), concluded in 2020 that governments across the UK fell most short of the targets *"which actually make a difference for species or habitats"*, calling the 2010s a *"lost decade"* for nature. In order to reverse the trend of failing to meet targets to which national and local government is committed, opportunities need to be identified. This cannot be done, targets cannot be met, habitat can not be protected or restored, the shocking demise of species and habitats in Britain cannot be reversed, without adequate action, policy and decision making at local level.

In England the *Environment Act 2021*, and subsequent regulations, set **legally binding biodiversity targets**, which will contribute to meeting international obligations. The targets are:

- to reduce the risk of species going extinct in 2042, compared with 2022
- to **create or restore** 500,000 hectares of wildlife-rich habitats by 2042
- to ensure overall species abundance **is increasing rather than decreasing** by 2030, and increases by 10% by 2042, compared with 2030

500,000 hectares, roughly 2,000 square miles, is roughly the size of North Wales. It will be absolutely necessary to engage on local levels to meet such a commitment. In order to contribute to this target Stockport must begin to identify and designate spaces it can create and restore into wildlife-rich habitats. Verges, verges with trees, small green islands in the middle of car parks (however biodiversly planted), piecemeal and fragmented attempts at mitigation and compensation can not be considered the creation of wildlife-rich habitat. Destroying habitat in areas already deprived of habitat, destroying the only areas of habitat in communities, will mean Stockport is adding to the negative trend and adding to the failure of reaching targets the United Kingdom is committed to.

Local and overall species abundance cannot improve unless the sum total of true habitat created is greater than that lost. Habitat and ecology concerns differ from climate and carbon concerns in that the current model of compensatory planting of trees does not realistically replace existing true habitat with all of its biological aspects. Offsetting by planting sapling trees can rarely replace habitat for species because it is often done piecemeal in smaller fragmented locations within harsh urban situations. It is a tactic used at meeting carbon omission challenges and should be regarded as such. Lone trees planted in paving in an urban setting will offset carbon and qualify as BNG but will not provide secure nesting sites for birds or adequate undergrowth for mammals to flourish.

In December 2023, Natural England summarised the measures the UK is taking. It includes creating a Nature Recovery Network and strengthening the remit of National Parks and National Landscapes to support nature recovery. Local authorities should also consider Nature Recovery Networks which can identify existing habitats that can be protected, restored, enhanced and designated. By doing so they will be doing their duty to legally bound targets set by the CBD. Those targets which are relevant to Stockport, Edgeley, and EWR are:

i. Reducing threats to biodiversity

TARGET 1: Plan and Manage all Areas To Reduce Biodiversity Loss
TARGET 2: Restore 30% of all Degraded Ecosystems
TARGET 3: Conserve 30% of Land, Waters and Seas
TARGET 4: Halt Species Extinction, Protect Genetic Diversity, and Manage Human-Wildlife Conflicts
TARGET 6: Reduce the Introduction of Invasive Alien Species by 50% and Minimize Their Impact
TARGET 7: Reduce Pollution to Levels That Are Not Harmful to Biodiversity
TARGET 8: Minimize the Impacts of Climate Change on Biodiversity and Build Resilience

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

TARGET 9: Manage Wild Species Sustainably To Benefit People
TARGET 10: Enhance Biodiversity and Sustainability in Agriculture, Aquaculture, Fisheries, and Forestry
TARGET 11: Restore, Maintain and Enhance Nature's Contributions to People
TARGET 12: Enhance Green Spaces and Urban Planning for Human Well-Being and Biodiversity
TARGET 13: Increase the Sharing of Benefits From Genetic Resources, Digital Sequence Information and Traditional Knowledge
TARGET 14: Integrate Biodiversity in Decision-Making at Every Level

iii. Tools and solutions for implementation and mainstreaming

TARGET 15: Businesses Assess, Disclose and Reduce Biodiversity-Related Risks and Negative Impacts
TARGET 16: Enable Sustainable Consumption Choices To Reduce Waste and Over consumption
TARGET 18: Reduce Harmful Incentives by at Least $500 Billion per Year, and Scale Up Positive Incentives for Biodiversity
TARGET 22: Ensure Participation in Decision-Making and Access to Justice and Information Related to Biodiversity for all

The strategies and targets are covered in detail in the body of this document.

1. Plan and manage all areas to reduce biodiversity loss

This target is concerned with addressing biodiversity loss in regard to planning and managing all areas. As far as authority is concerned, the ward is the basic building block of the organised local authority organised system. It is also at ward level where local community is directly effected. Recognising that land-use change is a major driver of biodiversity loss, this target pays regard to the importance of cross-sectorial approaches in consideration of interests, values and types of land-use with local community in mind. This commitment dictates that:

a) authority, identify the existing biodiverse nature of habitats such as EWF and consider it in spacial-planning

b) assess the existing biodiverse nature of habitats such as EWR within a (relative) environmental setting in order to allocate land-use and relative balance of land-use within that environmental setting.

c) authorities use the ecosystem approach to prioritise land-use within measured environmental settings, including the need to safe-guard nature, food security and human well-being.

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

2. Restore 30% of all degraded ecosystems

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

Previously existing as a natural habitat comprising of a rivulet fed by fine white sand springs EWR was degraded by human development in the early nineteenth century. For the last few decades, nature has reclaimed EWR and though it remains degraded due to subterranean urban footprints in parts, it is classified as woodland, scrub and grassland by ecologists. It is, as far as the current state of nature, and these targets go, already a success story. Destroying such a success story which can contribute toward committed targets, would be contrary to those targets agreed to by authority and contribute toward the decline of the state of nature in the UK.

Recognising that natural water is an important resource, among other things, Edgeley Wildlife Reserve Group would seek examining the feasibility of opening up the currently piped spring water rivulet to provide further habitat for species and to enhance the existing ecosystem. In regard to 'trade-offs to consider', the argument against a car park upon EWR is covered elsewhere in this document.

3. Conserve 30% of Land, Waters and Seas

This target is concerned with the adequate conservation and management with appropriate measures and designation, of areas important for biodiversity and local and wider ecosystems. In order to

contribute toward achieving this target it is important that Stockport work toward identifying the value of such areas as EWR. The multiple benefits of area-based conservation measures, in particular in regard to EWR, and in context to the deprived state of access to nature in Edgeley, are covered in more detail in Part 4: (*Community, Health & Education)* of this document.

Achieving the safeguarding of habitats and species is a target which cannot be attained by allowing the destruction of existing habitats, especially, as is the case with EWR, when those habitats already exist as secure refuges for species. To Edgeley, and the wider area, argued further in this document in regard to green corridors and wider water systems, EWR is central to concerns of natural habitat and therefore should be central to local authority conservation strategy.

EWR should be recognised as a prime example of a local area which can be designated as a protected area / OECM with the aim of reaching the committed target of expanding and enhancing areas managed with the aim of achieving positive outcomes for biodiversity.

4. Halt species extinction, protect genetic diversity and manage human-wildlife conflicts

This target is concerned with conflicts between wildlife and human activity and with species extinction and protecting genetic diversity. Section 3.0 (*State of Nature Report)* of this part (*Ecology and Biodiversity*) is relevant to understanding the relevance of species abundance and decline.

As well as particular species threatened by extinction, the target committed to, aims to improve the recovery and conservation of **all species**. Decline of habitat leads to decline of abundance which in the long term leads to extinction risk.

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

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

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

Maintaining and restoring genetic diversity of species, in order to avoid decline of abundance leading to threat of extinction, requires adequate and secure habitat. Particularly habitat which is considered connected to, or potentially can be connected to, other areas of local and wider ecosystems. Destroying, fragmenting and/or minimising the size of EWR's existing woodland, scrub and grassland habitat which is also important to the local ecosystem of reservoirs and the wider ecosystem through water networks (see Part **5**: *Water, Drainage & Flooding*) and potentially officially designated green corridors provided by railway embankments, to construct a car park, is detriment to all aspects of this target and will introduce rather than minimize human-wildlife conflict.

As more ecological and environmentally friendly alternatives to a car park upon EWR exist, human-wildlife conflict can be avoided through appropriate planning and re-design at architectural level. (See Part 7: *Alternatives*).

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

6. Reduce the introduction of invasive alien species by 50% and minimize their impact

Japanese Knotwweed is present within EWR, particularly in the northwestern corner. Though, whether Japanese Knotweed provides any form of habitat is not considered, it is non-native and identified as an invasive species with particular negative and destructive impacts. Therefore, its presence is responsible for a degree of reduced native ecology and ecosystem service upon the overall biodiversity quality of EWR.

Increase in human activity, particularly the construction industry, is responsible for the spread of Japanese knotweed from its immediate areas due to its spore driven reproduction system. JKW is therefore classed by authority as 'hazardous waste'. Construction of a car park upon EWR will not achieve the reduction of pathways (spread) of Japanese Knotweed but will likely exacerbate the problem. Management and elimination of the knotweed is the only viable option.

Knotweed roots can lie dormant up to 3m underground for up to 20 years and emerge through weaknesses in man made materials such as brick and paving. The risk of this happening after any construction of a car park with heavy footfall upon EWR would enable spores to be transported by human agency throughout a much wider area. Therefore, the risk of existing knotweed spores re-generating is best dealt with behind a gated and managed area.

If current efforts to destroy the knotweed within EWR by chemical means fail, Edgeley Wildlife Reserve Group would seek to examine the feasibility of more holistic methods.

This would involve the procurement of goats to consume the leaf and stalk, and, thereafter boar/swine to consume the root. This would be carried out after first surrounding the areas most effected with a boundary fence including within a wintering shelter for the animals. We envision that the animals chosen for this would be accommodated on a fostering basis with the intention of moving them on to wider pastures, national parks, and/or animal sanctuaries/petting zoos thereafter. The temporary or long term presence of such animals would be an element which might be an added attraction to the use of EWR for therapeutic, educational and health benefits of local community and groups.

The outcome of any holistic efforts in eliminating JKW should also be of interest to science. It would offer an opportunity to measure, analyse and collect relevant data on the method.

7. Reduce pollution to levels that are not harmful to biodiversity

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

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

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

8. Minimize the impacts of climate change on biodiversity and build resilience

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

Raising atmospheric carbon dioxide concentrations by encouraging driving together with the loss of existing habitat space is not compatable with minimizing the impacts of climate change but contributing to it. Minimizing impact of climate change upon biodiversity using ecosystem based approaches would consider alternatives to the destruction of EWR for the construction of a car park in view of alternatives (appropriate re-planning and re-design at architectural level and use of one car park less than planned) existing. (See: Part 7: *Alternatives*)

9. Manage wild species sustainably to benefit people

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 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**.

10. Enhance Biodiversity and Sustainability in Agriculture, Aquaculture, Fisheries, and Forestry

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 considered because the act states that policy should ensure that the collective pressure of human activities is kept within levels compatible with the achievement of good environmental status, that it does not compromise the capacity of marine ecosystems to respond to human-induced changes; that a 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.

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.

11. Restore, maintain and enhance nature's contributions to people

This 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 in this document.

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

This 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 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'.

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

This 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 and departments 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 planning application papers can be analysed and responded to in a longer time frame 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.

14. Integrate Biodiversity in Decision-Making at Every Level

This 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.

Therefore, these targets, in relevance to this planning application, are applicable to a number of departments, policies, regulations, processes, strategies, assessments and accounting, comprised within SMBC

for the purpose of contributing toward achieving the biodiversity relevant goals pursuant to commitments by UK Government.

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

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

16. Enable Sustainable Consumption Choices To Reduce Waste and Overconsumption

In the case of the planned car park upon EWR, promoting public transport and the use of existing car parks and initiating park and ride schemes should be encouraged and enabled in order to satisfy this target commitment. The Convention of Biological Diversity signed by UK Government, states that the establishment of support policy, legislative or regulatory frameworks should improve access to alternatives leading to the reduction of global footprint by 2030. Only by local authority action leading the way according to and relating to local issues can the nation meet targets.

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

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

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

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

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

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

Arising 'perverse incentives' might include, for example, a response from the applicant to the ideas contained within this document, attempting to offer the installation of community growing plots elsewhere on-site (or off-site) in order to gain positive outcome in decision making in regard to establishing a car park upon EWR.

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

Ensure the full, equitable, inclusive, effective and gender-responsive representation and participation in decision-making, and access to justice and information related to biodiversity by indigenous peoples and **local communities**, respecting their cultures and their rights over lands, territories, resources, and traditional knowledge, as well as by women and girls, children and youth, and persons with disabilities and ensure the full protection of environmental human rights defenders.

The Government's 25 Year Plan

Improving the Environment

According to *'The Environment Act 2021'*, *'Our 25 Year Plan to Improve the Environment'* published by Her Majesty's Government on 11 January 2018, is to be treated as an environmental improvement plan prepared by the Secretary of State under Section 1.

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

The twenty-five year plan 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'.

Evidence for clean air is well documented and can be, arguably, mitigated. A question that does arise is whether BNG mitigation calculations adequately consider vehicle use (omissions) and added attraction of an increase of vehicles (and resulting vehicle use and omissions) related to the land being mitigated. Goal #1 (clean Air) should consider not only a tree for tree plus 10% mitigation (added because many trees planted in mitigation will die, *etc*) but should include calculations based upon increased pollution by increased vehicle use and attraction.

Water, Drainage & Flooding is discussed in another part of this document. With Britain's water infrastructure currently in dire straights, clean and plentiful water is of paramount concern. A rivulet (now piped underground) sourced by natural fine sand springs runs through EWR. This is a valuable natural asset and has been ignored. This rivulet becomes open to the air at the boundary with Sykes Reservoir #1 after being joined by run-off from the railway premises. The rivulet is integral to the function of the reservoir system, potentially also to relieving flooding issues connected with the water table in the area. The rivulet continues westward, entering the wider river system.

Thriving plants and wildlife already exist in EWR and there is scope (pursuant to legally binding commitments) to enhance it. Removing their home will devastate local ecology in EWR itself and will greatly effect the ecology of the neighbouring reservoirs. Locally, the life currently situated in EWR CANNOT be replaced. There is nowhere of equal size left in Edgeley to replace it. If there was, it would take thirty years to achieve anything remotely similar in regard to undergrowth and younger trees and upwards of

fifty years to achieve anything similar in regard to maturer trees, microbial life, lichens, mosses, insect life and the combined system of their sum totals.

EWR is land that can be used and managed sustainably. Designating EWR as an urban nature reserve will contribute to the recovery of nature and enhance the local area. The idea for a gated nature reserve upon EWR will connect people with the environment to improve health and wellbeing (see Part 4: *Community, Health & Education*).

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.

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

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.

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 pages 15 to 59, government is committed to taking action toward establishing the following policy which develops a Nature Recovery Network to protect and restore wildlife, and provide opportunities to re-introduce species that we have lost from our countryside.

<u>Connecting People with the Environment to Improve Health and Wellbeing</u>

Pursuant with legally binding commitments established in The Environment Act 2021 and the targets referred to in pages 15 to 59, government is committed to taking action toward establishing policies which are 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.** 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 un designated 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. (See Part 4: *Community, Health & Education*).

The NPPF and the outline part of Planning Application DC/092211

The National Planning Policy Framework (NPPF) states that Local Plans must pass four tests of soundness before they can be considered appropriate for adoption. These tests set out that a plan must seek to meet the area's development needs. Three of them are:

1. In preparing the plan we also have to consider if it would be sustainable to help meet the needs of other nearby areas. Alternative ecosystem development needs and access to ecosystem services for the Edgeley community and surrounding areas are presented in Part 4: (*Community, Health & Education*).

2. 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. This document itself contains evidence that EWR is important to Stockport, in particular to Edgeley and its community, in biodiversity and ecological terms. Some alternatives to the outline part of the planning application (Ref: # DC/092211) are presented in Part 7: (*Alternatives)* of this document.

4. The plan should deliver sustainable development and conform with the NPPF and other national planning policy. National policy, as pursuant with The Environment Act, stipulates considerations relating to the declared biodiversity crisis and meeting legally binding commitments.

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. (Also see Part 4: *Community, Health and Education*)

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

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. (See also Part 4: *Community, Health & Education)*.

In the context of Edgeley, EWR (as an area of habitat) is irreplaceable. With the absence of a Local Plan, a Local Nature Recovery Strategy and a Biodiversity Action Plan, and according to the policies in the NPPF 2023, EWR should be considered as an asset warranting protection.

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 also Part 5: *Water, Drainage & Flooding*)

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 also Part 5: *Water, Drainage & Flooding*)

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. 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.

<u>Plan Making - Preparing and reviewing plans</u>

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 also Part **5**: (*Water, Drainage & Flooding*) and Part 7: (*Alternatives*).

<u>Plan Making - Examining plans</u>

Local plans and spatial development strategies should have assessed that the local area (Edgeley) is deprived of access to true natural habitat. The outline part of the planning application (Ref: # DC/092211 - development of a car park to the south) involves permanently removing the last reasonable vestige of natural habitat in Edgeley and along with it; the chances of establishing ecoservices which access to true natural habitat can offer in contribution to health, wellbeing and social cohesion 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 perceived figure of 150-200 out of 19,750 people. See also Part 4: (*Community, Health & Education*) and Part 7: (*Alternatives*).

Decision Making Pre-application engagement and front-loading

The environmental impact assessment and flood risk assessment in regard to the outline part of the planning application (Ref: # DC/092211) were not thoroughly informed and wider impacts and implications of developing the area have not been examined. The existing quality and potential scope of the area of EWR in regard to ecological surveying was lacking. Neither was the lone representation of EWR as viable habitat in the context of the local area considered in context of legally binding commitments to recover nature and improve biodiversity at local and community levels. See also Part 5: (*Water, Drainage & Flooding*).

Decision Making - Determining applications

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

Decision Making - Tailoring planning controls to local circumstances

It is necessary to protect Edgeley's last vestige of accessible true natural habitat of reasonable size for reasons relating to legally binding commitments to biodiversity and for the health, wellbeing, educational opportunities and social cohesion of the Edgeley community and surrounding areas, the latter reasons also encompassed by legally binding commitments to biodiversity.

Promoting healthy and safe communities

Many individuals in Edgeley, including children, marginalized groups, and people with disabilities or health problems, have interests other than football. They also need gateways leading to social interaction and local more accessible opportunities to enjoy and benefit from the activities within natural habitat that urban wildlife and nature reserves can provide. Such activities would include being involved in the protection, creation, restoration, enhancement and management of urban nature reserves as well as activities which such reserves can provide. Access to such areas should be one of the priorities considered in town planning. See also Part 4: (*Community, Health & Education*).

Gated wildlife and nature reserves offer schools options to expand education beyond school grounds, especially where (like Alexandra Park primary School in Edgeley) schools have no green areas or space to

create natural habitat of their own. This should be a consideration of town planners in plans and strategies across Stockport when making decisions on sites that have potential to be reserved for nature and wildlife.

Open space and recreation

As it stands today, EWR can deliver 'benefits for nature and support efforts to address climate change'. EWR cannot possibly be classed as surplus to requirements considering its potential to be enhanced to offer ecosystem opportunities to the local community. Opportunities for new provision in the form of a gated nature reserve in an area deprived of access to natural habitat should be informing assessments of the area.

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.

Promoting sustainable transport

The outline part of the planning application (Ref: # DC/092211 - development of a car park to the south) involves permanently removing the last reasonable vestige of self sustainable natural habitat in Edgeley, and along with it; the chances of establishing ecoservices which access to true natural habitat can offer in sustainable contribution to health, wellbeing and social cohesion of many people over many generations. See also Part 4: (*Community, Health & Education*).

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

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

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.

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

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

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

ing a basis for ecoservices related to health and wellbeing and education. See also Part 4: (*Community, Health & 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 **primary objective** of this development 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.

3.5. Ecological Surveys Relating to Planning Application

Chapter 3.5. (*Ecological Surveys Relating to Planning Application*) of Part 3: (*Ecology & Biodiversity*) will be submitted seperately as Appendices to this document.

They will include responses to: Bird Hazard Survey, Bowland Ecology Assessment, Tyler Grange survey, HIA Report, TEP Arboricultural Impact Assessment, and Scoping decision reports and statements.