

# Oldham

# Local Plan

**Publication Plan Integrated Assessment  
Appendix 19: Habitats Regulations  
Assessment**

January 2026



**Oldham**  
Council

# Habitats Regulations Assessment of the Impact on European Protected Sites of the Oldham Council Draft Local Plan (Publication Stage)

*November 2025*



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*V1.3*

# Habitats Regulations Assessment (HRA) of the Impact of the Oldham Local Plan (Publication Stage) on European Protected Sites

## 1. Introduction

- 1.1 The UK National Sites Network are sites of exceptional importance for the conservation of species and natural habitats. They are often referred to as 'European' protected sites because of their importance in a wider European context. The purpose of Habitats Regulation Assessment (HRA) of land use plans is to ensure that the protection of the integrity of European protected sites is an integral part of the planning process at a regional and local level. European protected sites comprise Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites. Government guidance advises that potential SPAs (pSPA), candidate SACs (cSAC) and potential Ramsar (pRamsar) sites are also included in HRAs.
- 1.2 Article 6(3) of Council Directive 92/43/EEC transposed into UK law by the Conservation of Habitats and Species Regulations 2017 (as amended) dealing with the conservation of European protected sites states that:
- 'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.'*
- 1.3 The Draft Oldham Local Plan is regarded as a Plan which is considered likely to have significant effect on one or more European protected site and should therefore be subject to assessment.
- 1.4 It is noted that the Plan being assessed may be subject to further amendments. Further Appropriate Assessments may therefore be required if changes are made as a result of future consultations or a future Examination in Public.
- 1.5 Habitats Regulation Assessments can be seen as having a number of discrete stages -
- Stage 1 – Screening
  - Stage 2 – Appropriate Assessment
  - Stage 3 – Derogation (compensation) where effects cannot be avoided or mitigated
- 1.6 This document forms Stage 1 and Stage 2 of the Habitats Regulation Assessment (HRA) process and contributes to the fulfilment of the Council's statutory duty as regards Article 6(3). It is an Opinion and an Assessment of whether the Draft Oldham Local Plan (Publication Stage) may have a significant effect on the special interest of any European designated protected sites.

It is also an Opinion on, and an Assessment of, whether any of the identified effects (if any) can be avoided or mitigated or whether any of the actions proposed in the plan need adjustment.

## 1.7 Stage 1 – Screening

The purpose of the Screening stage of the HRA process is to initially identify the risk or the possibility of significant adverse effects on a European site which could undermine the achievement of a site's conservation objectives, and which therefore require further detailed examination through an appropriate assessment. If risks which might undermine a site's conservation objectives can clearly be ruled out (based on the consideration of objective information), a proposal will have no likely significant effect (LSE) and no appropriate assessment will be needed. In order for a policy or an allocation in a Plan to be screened out of the HRA process a conclusion must be made 'beyond reasonable scientific doubt' that the policy or allocation will not have an LSE on the European Protected site or its qualifying features. Case law has established in relation to screening that:

- An effect is likely if it 'cannot be excluded on the basis of objective information' (Waddenzee C127-02 ¶ 45). This requires consideration and a conclusion made against known and presented data/survey or results/scientific evidence (e.g. literature review).
- An effect is significant if it 'is likely to undermine the conservation objectives' [of the European protected site (Waddenzee (C127-02 ¶ 48)]. This excludes from consideration other impacts not related to the qualifying features and their conservation objectives.
- In undertaking a screening assessment for likely significant effects 'it is not that significant effects are probable, a risk is sufficient, but there must be credible evidence (see above) that there is 'a real, rather than a hypothetical, risk' Boggis v Natural England & Waveney District Council. This refines the understanding of the 'precautionary principle' as it applies to the Habitats Regulations.
- The Sweetman (case C258-11) also offers some simple guidance that the screening step 'operates merely as a trigger', in order to progress to further assessment stages through the process.

## 1.8 Stage 2 – Appropriate Assessment

In 2017 the decision of the Court of Justice of the European Union (People over Wind, case C323/17) concluded that it was not appropriate within the Screening Stage to consider measures that would mitigate for impacts on the qualifying or designated features of the European site. This ruling has resulted in an update to the Habitats Regulations 2017 as they have been translated into UK domestic legislation and updated Habitats Regulations (amendment)(EU Exit) 2019 to reflect the exit of the UK from the European Union. In a Stage 2 – Appropriate Assessment, evidence and detail should be considered which can demonstrate that a Plan including any embedded measures or additional mitigation can result in a conclusion that there would be no 'adverse effect on integrity' (AEOI), when considering a European site conservation objectives. In applying the Stage 2 – Appropriate Assessment the relevant competent Authority – in this case the Local Authority concerned – must also consider whether there is a relevant planning mechanism (which may apply at a different level of the planning hierarchy) which can secure the necessary mitigation via either conditions or obligations.

In the case of a Strategic Local Plan the level of detail in land use plans concerning developments that will be permitted under the Plan at some time in the future is rarely sufficient to allow the fullest quantification of potential adverse effects. It is therefore necessary to be cognisant of the fact that HRAs for plans can be tiered, with assessments being undertaken with increasing specificity at lower tiers. This is in line with DCLG guidance and court rulings that the level of detail of the assessment, whilst meeting the

relevant requirements of the Habitats Regulations, should be 'appropriate' to the level of plan or project that it addresses.

Government guidance says:

*"The scope and content of an appropriate assessment will depend on the nature, location, duration and scale of the proposed plan or project and the interest features of the relevant site. 'Appropriate' is not a technical term. It indicates that an assessment needs to be proportionate and sufficient to support the task of the competent authority in determining whether the plan or project will adversely affect the integrity of the site." That is, the Plan must make every effort to ensure that no Policies or Allocations will cause harm to the special nature conservation interest of European sites. But where some doubt remains as to whether harm will occur the plan must show that sufficient safeguards will be in place in other levels of the planning hierarchy to ensure that no harm will be caused to the special interest of European sites. A precautionary approach should always be taken".*

The advice of Advocate-General Kokott to the European Court of Justice (9th June 2005, Case C-6/04) is relevant. She commented that:

*"It would ...hardly be proper to require a greater level of detail in preceding plans [rather than planning applications] or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the Plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure"*

## 1.9 In-Combination Assessment

The Habitats Regulations also include a requirement for an assessment not only for a Plan alone but also for consideration of any LSE in combination with other projects or plans. An 'in combination' assessment should be undertaken for any impact which is shown to have an effect even where it might be considered 'de minimis' for the plan in isolation. In the application of the in-combination test projects or plans are also considered to include reasonably foreseeable proposals (RFP), which may include projects, plans or schemes which have not concluded their passage through the development planning process, whether they are in full or outline or include other strategic planning documents.

Other plans which are also important in the context of the Oldham Local Plan which are considered here in the test of in-combination effects include:

- Places for Everyone Joint Development Plan Document (2024);
- Greater Manchester Joint Minerals DPD (2013);
- Greater Manchester Joint Waste DPD (2012);
- Other Supplementary Planning Documents and Local Plans.

These usually include their own Habitats Regulation Assessments and the conclusions of these HRAs have been taken into consideration when determining whether or not likely significant effects will occur.

## 1.10 The Competent Authority

The competent authority under the Habitat Regulations, is the body which undertakes the assessment of likely significant effects (LSE). This is usually the Local Planning Authority in relation to the preparation of Plans or the consideration of planning applications, but may also be another statutory body who has authority and powers to permit, consent or licence activities (e.g. the Environment Agency). Natural England as the statutory government advisor in these matters also has a role in the process to ensure that the Plan will not have any likely significant harmful effects on European sites. Natural England should therefore be consulted on the HRA.

A Judicial Review (R (Preston) v Cumbria County Council [2019] EWHC 1362) concerning a project level HRA ruled that a Local Planning Authority cannot rely on the future decisions and assessment of another permitting competent authority (in this instance the Environment Agency) within their own conclusions on the Screening (Stage 1) and must give consideration of sufficient securing measures (Stage 2 – Appropriate Assessment) at the time of their own determination of an application for development.

Government guidance in this regard which seems relevant to plans, outline proposals or operations which might require an additional consent/permit from a third party indicates:

- a competent authority is permitted to grant a plan or project consent which leaves the applicant free to determine subsequently certain parameters relating to the construction phase, only if that authority is certain that the consent includes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

While this Plan, and the HRA, are at a high tier of the planning process, this is important when considering any necessary mitigation for identified effects.

## 1.11 The Greater Manchester Ecology Unit

The Greater Manchester Ecology Unit (GMEU), as the specialist ecological adviser to Oldham Council has prepared this Screening Opinion and Appropriate Assessment. Information held by Natural England and the Joint Nature Conservation Committee (JNCC) was consulted for the qualifying features, the conservation objectives and favourable condition for the European Sites concerned (the information is summarised below).

GMEU ecologists familiar with the European sites concerned and their special interests reviewed the ecological information. The key vulnerabilities and sensitivities of the European sites concerned are well understood by GMEU allowing for an informed assessment of the possible effects of the Plan, and any specific aims, objectives and policies contained in the Plan.

GMEU has prepared a number of HRAs for Local Plans and Strategies, prepares HRAs for planning applications across Greater Manchester and Lancashire and is often consulted on HRAs prepared by others.

## 1.12 This report assesses the 'Draft Oldham Local Plan (Publication Stage)' (2025). It is recognised that as the name suggests the Plan provides a framework for all development in Oldham and that land currently not allocated may come forward for development during the period of the Plan. This HRA will therefore likely be subject to amendment as Plans and associated projects progress.

The assessment takes into account the likely cumulative impacts (in-combination effects) of other Plans, Strategies and Projects within the wider Greater Manchester city region and beyond.

## 2.0 Brief description of the Plan

- 2.1. The Plan being assessed is the Draft Oldham Local Plan (Publication Stage) 2025.
- 2.2. The primary purpose of the Local Plan is to guide development proposals within the Borough of Oldham up to 2039.

The overall Vision for the Plan for Oldham is that by 2039 -

*Oldham will have a clean, green and healthy environment. We will have responded to both the Biodiversity and Climate Change emergencies through the protection, restoration and enhancement of the natural environment and having a substantially reduced carbon footprint from meeting the council's ambition to achieve carbon neutrality by 2030. Oldham will be a carbon neutral exemplar with a resilient and multifunctional Green Infrastructure network which brings multiple benefits to the natural and built environment as well as to the health of its residents and visitors.*

*Through delivering at least 11,560 new homes of different sizes and types, including affordable housing, Oldham will have quality homes for everyone that meet the needs of Oldham's residents. New homes, delivered in sustainable and accessible locations, will contribute to inclusive and vibrant communities where everyone can live.*

*Oldham will be a key contributor to Greater Manchester's economy, with a strong reputation for clean growth and green innovation. It will be a place of dynamic businesses with better job opportunities, where those businesses local to Oldham are supported to thrive and grow, and those new to Oldham are attracted to invest. Every resident will be enabled to contribute to, and benefit from, economic growth of the city region providing significant progress in living standards, wages and skills for everyone in Oldham.*

*Oldham will have accessible and sustainable transport choices, providing improved connectivity across the borough, the city-region and beyond - for all. We will have an integrated transport system that enables the local economy to prosper and our residents to fully contribute to and benefit from job opportunities, and a comprehensive network of on and off-road walking, wheeling and cycling routes that encourage active travel, making it easier and safer for people to get to key local destinations.*

*Oldham Town Centre will be a place that thrives by combining a retail core with quality homes, opportunities to learn, develop new skills and gain employment, and a diverse culture, leisure and night-time offer that supports its local communities and attracts visitors. Our Town Centre will be supported by the borough's other centres – Chadderton, Failsworth, Hill Stores, Lees, Shaw, Royton and Uppermill which will continue to provide a vital role in meeting the needs of the borough's communities, connecting our residents to local services and facilities in a way that fosters a sense of community and local identity.*

*Oldham residents will be healthy, safe and well-supported, having a great start from early years and with skills for life. They will have access to local community facilities and health and well-being provision and will have active and healthier lifestyles gained from access to active travel, green infrastructure and opportunities for sport and recreation.*

*Opportunities for excellent training and life-long education will be available to all Oldham residents, raising aspirations, reducing inequalities and tackling poverty. Providing residents with a great start and skills for life so that they can make the most of opportunities available to them, whilst meeting the needs for local businesses and helping to attract and retain new business opportunities.*

*New development will be net zero and in line with co-design expectations and design codes developed with Oldham's communities, whilst the key characteristics of Oldham's*



*townscape and landscape types and Oldham's historic environment and rich heritage will be conserved and enhanced*

The key Objectives of the Plan are given as –

PO1 Building quality homes to meet local needs and diversify the housing offer by:

- providing for, and supporting the delivery of, at least 11,560 new homes;
- delivering a diverse housing offer to meet the needs of all our residents including affordable housing and homes for families, older people and disabled people;
- ensuring the delivery of high-quality, sustainable and well-designed new homes; and
- ensuring appropriate densities and making the best and most effective use of brownfield land.

PO2 Providing opportunities to learn and gain new skills by:

- supporting the provision of suitable, modern services and facilities for the education and training of all age groups, including addressing the needs for primary and secondary school places; and
- encouraging employment and skills opportunities for local people as part of new developments.

PO3 Boosting northern competitiveness by providing access to employment opportunities and growing local businesses by:

- providing for, and supporting the delivery of, at least 57,481 sqm of office floorspace and at least 240,656 sqm of industrial and warehousing floorspace;
- protecting designated sites that are suitable and attractive for existing and new businesses to locate to and expand on;
- encouraging and facilitating the development of the borough's key economic sectors with a focus on clean growth and green technologies;
- supporting the expansion of digital infrastructure to assist economic growth; and
- supporting a range of sustainable leisure and tourism activities.

PO4 Supporting the regeneration of Oldham Town Centre and creating thriving centres by:

- supporting the delivery of the Oldham Town Centre Development Framework and appropriate plans or projects that facilitate the regeneration of the borough's other centres; and
- promoting and enhancing the vitality and viability of the borough's centres to ensure their long-term sustainability.

PO5 Protecting and enhancing Oldham's landscapes by:

- protecting and furthering the purposes of the Peak District National Park;
- promoting the positive use of the Green Belt;
- identifying Local Green Spaces and supporting their enhancement; and
- ensuring high quality new development makes a positive contribution to Oldham's landscape and townscape features and characteristics.

PO6 Protecting, restoring and enhancing the natural environment by:

- protecting and restoring core areas of wildlife;
- promoting nature recovery networks and improving connectivity in areas of lower biodiversity;

- using nature-based solutions to mitigate against, and be resilient to, climate change;
- delivering on the priorities for nature recovery within the Local Nature Recovery Strategy; and
- implementing Oldham's Green Infrastructure Strategy and supporting projects such as Northern Roots.

PO7 Promoting sustainable development that mitigates and adapts to climate change by:

- achieving high standards of sustainable design and construction;
- adopting a positive approach towards energy schemes and the identification of low carbon and renewable energy opportunities;
- reducing the risk of flooding to people and property taking into account climate change;
- managing flood risk using integrated water management and the provision of multi-functional green infrastructure;
- promoting the efficient use of water resources and water quality; and
- protecting and reinstating restorable peat, allowing it to act as an important carbon sink.

PO8 Uplifting the health and well-being of our residents and local communities by:

- facilitating and encouraging local and accessible health and well-being provision;
- protecting and enhancing access to, and providing for / or improved open spaces, sports and recreation facilities, to meet the needs of new development and communities;
- providing spaces to grow food in new and existing communities, such as allotments and community gardens and connecting people to nature;
- supporting and protecting new and existing community facilities;
- reducing crime and fear of crime and promoting community safety, through good design of the built environment;
- improving air quality for the benefit of everyone; and
- providing and maintaining high standards of amenity and local environmental quality.

PO9 Improving and valuing a better historic and built environment, by:

- delivering high-quality design and placing greater emphasis on place-making, with buildings and spaces that respond positively to local distinctiveness and character;
- conserving and enhancing the borough's historic environment and heritage assets, including the borough's textile mills; and
- ensuring that proposals within Oldham Town Centre follows the recommendations set out in the Oldham Town Centre Conservation Area Management Plan with the aim of removing the Conservation Area from the 'at-risk' register.

PO10 Promoting accessible and sustainable transport choices, by:

- supporting delivery of Oldham's Transport Strategy and the Right Mix approach to encourage active travel (walking, wheeling and cycling) and an increase in travel by sustainable modes;
- reducing the need to travel by car through ensuring new development is located in areas with access to public transport, local services and facilities; and
- improving public transport connectivity for Oldham's residents to key areas of employment within the borough, the city region and beyond.

### 3.0 Identification of European designated sites concerned

- 3.1 This Assessment has first screened all European sites in the region to generate a long list and then assess which of these sites are likely to be affected by future development in Oldham. There are two European designated sites within the boundaries of Oldham, the Rochdale Canal Special Area of Conservation and the South Pennine Moors Special Area of Conservation and Special Protection Area; in addition when assessing the impact of a Plan on European protected sites it is important to consider the impact on sites not only within the administrative area covered by the Plan but also those which fall outside the Plan boundary, as these could still potentially be affected by the operation of the Plan.

The list of sites assessed and their proximity to Oldham are shown in Appendix 1.

#### The Screening Criteria

- 3.2 In carrying out the initial screening process, the Assessment has considered the main possible **sources** of effects on the European sites arising from the Plan, possible **pathways** to the European sites and the effects on possible sensitive **receptors** in the European sites. Only if there is an identifiable source, a pathway and a receptor is there likely to be a significant effect.
- 3.3 Possible sources and pathways for effects arising from development in Oldham on the identified Sites and used in the screening of European sites are considered to be:
- Water pollution and impacts on hydrology via watercourse, surface water and groundwater moving from sites in Oldham to European sites (habitat damage and species loss);
  - Air pollution, primarily transport related via road traffic (habitat damage);
  - Increased recreational disturbance of European sites and functionally linked land\* (species disturbance and habitat damage);
  - Risk of invasive non-native species introduction via waterways (habitat and species impacts);
  - Loss of functionally linked land;
  - Direct habitat loss within European sites;
  - Noise and Visual Disturbance;
  - Light spillage and/or shading.

*\* functionally linked land is land outside of designated sites but which is regularly used by key species associated with a designated site and which is considered to be key to the survival of the species concerned*

- 3.4 Guidance and precedence concerning distances at which significant effects on European sites are caused by water or air pollution has been taken into account during the screening of European sites. Recommended buffer zones for certain types of 'most damaging' operations (e.g. air pollution from vehicles and recreational disturbance) have been used in the screening of sites. The buffer zones are based on the distances before air pollution sources and recreational disturbance become so diffuse so as to be indiscernible or impossible to ascribe to particular source. Outside of these buffer zones significant effects on European sites arising from water and air pollution are considered unlikely to arise. The precautionary buffer used for this HRA is 20 km.
- 3.5 Natural England also publish SSSI 'Impact Risk Zones' (IRZs) providing guidance on the types of development which should be considered for their possible impacts on SSSIs and which impacts should be considered. All European designated sites are also designated as

SSSIs. IRZs have also been taken into account when screening European sites that could be affected by the Plan.

- 3.6 The nine authorities involved for the Places for Everyone (PfE) strategic plan (including Manchester) have published a supplementary planning document (SPD) covering Holcroft Moss (part of the Manchester Mosses SAC). An SPD has also been published by Oldham, Rochdale and Tameside covering the South Pennines SAC/SPA. These documents have also been taken into account when Screening European sites that could be affected by the Plan.
- 3.7 Although guidance concerning buffer zones/risk zones has been taken into account when screening European protected sites, in the case of a Plan affecting the development of an entire metropolitan area, buffer/risk zones should be regarded as important but **not** as definitive; for example, this buffer zone may not be sufficient when assessing certain very large-scale developments, secondary impacts, or cumulative impacts where pathways to receptor sites are rivers, air pollution is a factor or the receptor site is sensitive to recreational pressure resulting from an increase in population.
- 3.8 Taking the above into account the following European sites are Screened In owing to proximity to Oldham or because there are likely pathways between Oldham and the designated sites -
- Manchester Mosses SAC (diffuse air pollution impacts),
  - Rochdale Canal SAC (direct and indirect impacts),
  - South Pennines Moors SAC/SPAs Parts 1 and 2 (direct and indirect impacts).

Other European sites initially considered but Screened-out of the assessment include:

- Liverpool Bay SPA– whilst hydrologically linked to Oldham the distance from Oldham (over 30km) and the volume of water in Liverpool Bay is such that any pollutants generated in Oldham could not be reasonably attributed to any likely significant effects owing to a reduction in water quality detected in Liverpool Bay SPA.

## **4.0 Initial Screening of potential Likely Significant Effects (LSE) -**

Sources of potential impacts are described and considered in more detail below. The aim of this section is to provide reasoned justification for the decisions made later in the Screening.

### **4.1 Potential impacts of development managed by the Plan on European sites and therefore Screened In include -**

- Water pollution and impacts on hydrology via watercourse, surface water and groundwater moving from sites in Oldham to European sites (habitat damage and species loss);
- Air pollution, primarily transport related via road traffic (habitat damage);
- Increased recreational disturbance of European sites and functionally linked land\* (species disturbance and habitat damage);
- Risk of invasive non-native species introduction via waterways (habitat and species impacts);
- Loss of functionally linked land;
- Direct habitat loss within European sites;
- Noise and Visual Disturbance;
- Light spillage and/or shading.

The following brief discussion of these impacts is included to give an understanding of the rationale for the conclusions reached in the subsequent Screening process, summarised in Table 6.1.

### **4.2 Direct Habitat Loss**

Direct Habitat Loss could affect the Rochdale Canal SAC and the South Pennine SPA/SAC, since parts of these designated sites are location within Oldham.

### **4.3 Water Quality**

4.3.1 Negative effects on distant European sites, both habitats and qualifying species, can occur through increases in water pollution and sediment load such as nutrient enrichment from diffuse pollution discharged from waste water treatment works, agricultural run-off and/or industrial processes.

4.3.2 Of the list of designated sites considered, diffuse water pollution could have an effect on the Rochdale Canal Special Area of Conservation (SAC)

The Rochdale Canal SAC has been designated because it supports important populations of aquatic plant communities. These plant communities could be harmed by increased water pollution.

### **4.4 Air Quality**

Air can transport pollution, dust and odours over significant distances and air pollution can cause significant harm to habitats and species. The main types of air pollutants likely to have an adverse effect on an ecologically important site are:

- Oxides of Nitrogen (NO<sub>x</sub>);
- Ammonia (NH<sub>3</sub>);
- Dust;
- Sulphur Dioxide (SO<sub>2</sub>);

- Low level Ozone (O<sub>3</sub>);
- Acid deposition caused from chemical reactions to NO<sub>x</sub>, SO<sub>2</sub> and CO<sub>2</sub>.

4.4.1 Of these NO<sub>x</sub> (nitrates) are the most likely to arise as a result of development controlled by the Plan under consideration here. Dust and low-level ozone only have effects very close to the source. Ammonia emissions are most closely associated with certain types of intensive agricultural production not identified as a significant land-use within Oldham. SO<sub>2</sub> emissions are associated with certain industrial operations such as paper pulp, cement and smelting and burning of fossil fuels such as coal and oil.

The main sources of these pollutants are road traffic. The greatest damage caused by nitrates occurs within 200 - 250m of the source. Development within Oldham could cause increases in localised traffic pollution and could also generate road traffic over a much wider area. Where proposed developments within Oldham are likely to result in increases of these pollutants arising, they have been screened into this Assessment.

4.4.3 The issue of diffuse air pollution is complicated by the fact that the South Pennines and the Manchester Mosses European sites are already exceeding nitrate levels in some places which would be considered harmful to sensitive habitats on these sites (*source* Natural England and Air Pollution Information System (APIS)), so any level of increased nitrate pollution no matter how small could be considered to be harmful.

4.4.4 A joint Supplementary Planning Document has been produced by the nine Places for Everyone authorities providing guidance on when levels of traffic generation are likely to require mitigation with regards to Holcroft Moss, part of the Manchester Mosses SAC. The current guidance is that any development that generates more than 100 vehicle movements along the M62 or 20 HGV's will exceed the threshold. This includes development within Oldham.

4.4.5 For the South Pennines SAC/SPA and other parts of the Manchester Mosses SAC no guidance is currently available. They have therefore been screened-in using the precautionary principle. However, it is noted that the HRA of the Places for Everyone Strategic Plan concluded that there would be no discernable impacts arising on the South Pennine Moors designated sites arising from increases in air pollution.

## 4.5 Recreational Pressure

The effects of significantly increased populations and associated recreational pressures on the Regions' European protected sites has been considered in this Assessment because it is recognised that this could have a negative effect on the special interest of some European sites.

Recreational use of an internationally designated site has potential to:

- Cause damage through excessive erosion (trampling, wear and tear);
- Cause nutrient enrichment;
- Cause disturbance to sensitive species,
- Prevent appropriate management or exacerbate existing management difficulties.

4.5.1 The European protected sites considered to be potentially most at risk from increased recreational pressures are the Rochdale Canal SAC, the Manchester Mosses SAC, and the South Pennine Moors SAC/SPA.

4.5.2 The Rochdale Canal SAC has been designated because it supports important populations of aquatic plants. Increases in recreational canal boat use along the Canal

could cause harm to aquatic plants. Boat movements along the Canal, and populations of notable aquatic plant species, are monitored and controlled by the Canal and Rivers Trust.

4.5.3 The South Pennines SPA and SAC are in part promoted as recreation destinations and are therefore potentially vulnerable to an increase in population in Oldham.

4.5.4 However, Natural England have advised that there is no available evidence that recreational disturbance of the South Pennines SPA or SAC will result in any likely significant effects. (ref. letter dated 7<sup>th</sup> August 2024 from Natural England to the GMCA, [South Pennine Moors Special Area of Conservation \(SAC\) / Special Protection Areas \(SPAs\) Joint Supplementary Planning Document](#)). the South Pennines SPA/SAC can therefore effectively be screened out of this HRA.

## **4.6 Functionally Linked Land**

For an area to be considered as functionally linked to a European site it must be shown to regularly support significant numbers of species for which a European site has been designated. 'Regularly' is taken to mean over a number of years, but there is no accepted standard definition of what may constitute 'significant numbers' because this will depend on the species concerned.

The concept has been most often studied in relation to birds, bats and marine species, because these species are highly mobile in their habits and can rely on sites very far apart to complete their life cycles.

4.6.1 There is a risk of land in Oldham being functionally linked to the South Pennine Moors SAC/SPA as the qualifying species are primarily mobile bird species that can regularly use land outside the designated areas. For this reason, risk to functionally linked land associated with the South Pennine Moors SAC/SPA has been Screened-in.

## **4.7 Light Spillage and Shading**

These effects could affect plant communities in the Rochdale Canal SAC.

## **4.8 Noise and Visual Disturbance**

These effects could affect notable bird species associated with the South Pennine Moors, if development encroaches within or close to the boundaries of the designated sites.

## **4.9 Introduction of invasive species**

This could potentially affect the Rochdale Canal SAC through mobilisation of contaminated land associated with development close to the Canal.

#### **4.10 Summary Results of Screening of Sites**

From the Screening process, the following European designated sites have been identified as having some potential to be affected by development proposed and planned for within the Oldham Draft Local Plan (publication stage):

- Manchester Mosses SAC;
- Rochdale Canal SAC
- South Pennine Moors SPA/SAC (Parts 1 and 2);



## 5.0 The Nature Conservation Interest of the “Screened In” European Sites

The following information is derived from information available from Natural England and the Joint Nature Conservation Committee and from information held by GMEU.

### 5.1 Manchester Mosses SAC

#### 5.1.1 Description of the Manchester Mosses SAC

Mossland formerly covered a large part of low-lying Greater Manchester, Merseyside and southern Lancashire, and provided an obstacle to industrial and agricultural expansion. While most has now been converted to agriculture or lost to development, several examples have survived as degraded raised bog, such as Astley & Bedford Mosses (Manchester), Risley Moss (Warrington) and Holcroft Moss (Warrington). Their surfaces are now elevated above surrounding land due to shrinkage of the surrounding tilled land, and all except Holcroft Moss have been cut for peat at some time in the past. While historic drainage has resulted in purple moor-grass (*Molinia caerulea*), bracken (*Pteridium aquilinum*) and birch (*Betula*) spp. scrub or woodland colonising the lowland bog habitat, wetter pockets have enabled the peat-forming species to survive. Habitat management including rewetting and reintroduction of appropriate lowland bog species has started to reverse the degradation of these sites.

#### 5.1.2 Primary Reason for Designation of the Manchester Mosses SAC

The site supports degraded bog still capable of natural regeneration (JNCC code 7120), which has the potential to be restored to active raised bog (JNCC code 7110).

#### 5.1.3 Conservation Objectives of the Manchester Mosses

The conservation objectives (Natural England 2018) for this site are:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of qualifying natural habitats;
- The structure and function (including typical species) of qualifying natural habitats, and;
- The supporting processes on which qualifying natural habitats rely.

#### 5.1.4 Supplementary Advice on Conserving and Restoring

On this site, favourable condition requires the maintenance of the extent of each designated habitat type. A series of site-specific targets, which will contribute to favourable condition, have been produced by Natural England. However, many of these relate to management of the habitats on the site and are not particularly applicable to assessing the effects of development proposals on the SAC whilst others relate to direct impacts. Therefore, the operations that may damage the special interest of the SAC resulting from development in Oldham have been restricted to:

- Pollution including atmospheric pollutants and NO<sub>x</sub>;
- Hydrological impacts and;
- Recreational activities.

## 5.2 Rochdale Canal SAC

The Rochdale Canal SAC contains important habitats for submerged aquatic plants and emergent vegetation, including extensive colonies of the nationally scarce floating water-plantain *Luronium natans*. The site also supports a diverse assemblage of aquatic flora, in particular nine species of pondweed *Potamogeton* spp. The plant communities found in the Rochdale Canal are characteristic of mesotrophic water bodies, i.e. those which are moderately nutrient-rich.

### Conservation Objectives

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring –

- The extent and distribution of the habitats of qualifying species
- The structure and function of the habitats of qualifying species
- The supporting processes on which the habitats of qualifying species rely
- The populations of the qualifying species, and,
- The distribution of the qualifying species within the site

**List of operations that could potentially damage the special interests of the European Site include from the JNCC standard data sheet and Natural England advice on operations:**

- Human induced changes in hydrological conditions
- Invasive non-native species;
- Changes in abiotic conditions;
- Water pollution
- Air pollution, air-borne pollutants;
- Biocenotic evolution, succession.
- Recreational disturbance, especially increases in canal boat traffic

## 5.3 South Pennines Moors (Phase 1 and Phase 2) SPA

### 5.3.1 Description

The site is an extensive tract of moorland and moorland-fringe habitat. It includes most of the unenclosed moorland areas of the north, eastern and south-western Peak District, where it also extends into enclosed farmland of wet rushy pasture, hay meadows and small wetlands in the valley bottoms. The moorland habitats include extensive tracts of blanket bog and dry heath, which together with wet heath, acid grassland, small flushes, gritstone edges and boulder slopes, streams and moorland reservoirs, fringing semi-natural woodland and enclosed farmland, represents the full range of upland vegetation characteristic of the South Pennines. The site supports several important species assemblages, including higher plants, lower plants and insects, as well as breeding birds. Many physical features are of geological interest.

### 5.3.2 Primary Reason for Designation

#### Qualifying species

This site qualifies under Article 4.1 of the Conservation of Wild Birds Directive (79/409/EEC) as it is used regularly by 1% or more of the Great Britain population of species listed in Annex I

**In any season:**

Merlin (*Falco columbarius*) 30 – 36 breeding pairs representing 2.3-2.8% of the breeding population in Great Britain (period 1990/1998)

Golden Plover *Pluvialis apricaria*) 435 - 445 breeding pairs representing 1.9-2.0% of the breeding population in Great Britain (period 1990/1998)

Short-eared Owl (*Asio flammeus*) 22 - 25 breeding pairs representing 2.2 -2.5% of the breeding population in Great Britain (period 1990/1998)

**Non-qualifying species of interest:**

The site supports a rich upland breeding bird assemblage which, as well as the qualifying species listed above, includes important numbers of Peregrine (*Falco peregrinus*), Lapwing (*Vanellus vanellus*), Dunlin (*Calidris alpina schinzii*), Snipe (*Gallinago gallinago*), Curlew (*Numenius arquata*), Redshank (*Tringa tetanus*), Common Sandpiper (*Actitis hypoleucos*), Whinchat (*Saxicola rubetra*), Wheatear (*Oenanthe oenanthe*), Ring Ouzel (*Turdus torquatus*) and Twite (*Carduelis flavirostris*).

**5.3.3 Conservation Objectives**

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features and;
- The distribution of the qualifying features within the site.

**5.3.4 List of operations that could potentially damage the special interests of the European Site include:**

- Hunting and collection of Wild Animals;
- Fire and Fire Prevention;
- Human induced changes in hydraulic conditions;
- Outdoor sports, leisure and Recreational Activities;
- Outdoor sports, leisure and recreational activities to functionally linked land; and
- Reduced fecundity and genetic suppression.

**5.4 South Pennine Moors SAC****5.4.1 Description**

This site covers the key moorland blocks of the Southern Pennines from Ilkley Moor in the north to the Peak District in the south. The moorlands are on a rolling dissected plateau formed from rocks of Millstone Grit at altitudes of between 300m – 600m and a high point of over 630m at Kinder Scout. The greater part of the gritstone is overlain by blanket peat with the coarse gravely mineral soils occurring only on the lower slopes. The moorlands as a whole support a breeding bird community of national and international importance. The site is representative of upland dry heath, which covers extensive areas, occupies the lower slopes of the moors on mineral soils or where peat is thin, and occurs in transitions to acid grassland, wet heath and blanket bogs. The upland heath of the South Pennines is strongly dominated by *Calluna vulgaris* – *Deschampsia flexuosa* heath and *C. vulgaris* – *Vaccinium myrtillus* heath. More rarely *C. vulgaris* – *Ulex gallii* heath and *C. vulgaris* –

*Erica cinerea* heath are found. On the higher, more exposed ground *V. myrtillus* – *D. flexuosa* heath becomes more prominent. The smaller area of wet heath is characterised by cross-leaved heath *Erica tetralix* and purple moor grass *Molinia careulea*. The site also supports extensive areas of acid grassland largely derived from dry and wet heath. In the cloughs, or valleys, which extend into the heather moorlands, a greater mix of dwarf shrubs can be found together with more lichens and mosses. The moors support a rich invertebrate fauna, especially moths, and important bird assemblages. This site also contains areas of blanket bog, although the bog vegetation communities are botanically poor. Hare's-tail cotton-grass *Eriophorum vaginatum* is often overwhelmingly dominant and the usual bog-building Sphagnum mosses are scarce. Where the blanket peats are slightly drier, heather *C. vulgaris*, crowberry *Empetrum nigrum* and bilberry *V. myrtillus* become more prominent. The cranberry *Vaccinium oxycoccus* and the uncommon cloudberry *Rubus chamaemorus* is locally abundant in bog vegetation. Bog pools provide diversity and are often characterised by common cotton-grass *E. angustifolium*. Substantial areas of the bog surface are eroding, and there are extensive areas of bare peat. In some areas, erosion may be a natural process reflecting the great age (up to 9000 years) of the South Pennine peats. Around the fringes of the upland heath and areas of bog are blocks of old sessile oak woods, usually on slopes. These tend to be dryer than those further north and west, such that the bryophyte communities are less developed (although this lowered diversity may in some instances have been exaggerated by the effects of 19th century air pollution). Other components of the ground flora such as grasses, dwarf shrubs and ferns are common. Small areas of alder woodland along stream-sides add to the overall richness of the woods. The moorland also supports a range of flush and fen habitats associated with bogs, cloughs, rivers and streams. Although generally small scale features they have a specialised flora and fauna, which makes a great contribution to the overall biodiversity of the moors. Acid flushes are the most common type and these include transition mires and quaking bogs characterised by a luxuriant carpet of bog mosses Sphagnum spp., rushes and sedges.

#### 5.4.2 Qualifying Features

*Under Article 4(4) of the Council Directive (92/43/EEC) on the conservation of natural habitats and of wild fauna and flora as it hosts the following habitats listed in Annex I:*

- Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath (JNCC Habitat code H4010);
- European dry heaths (JNCC Habitat code H4030);
- Blanket bogs\* (JNCC Habitat code H7130);
- Transition mires and quaking bogs; Very wet mires often identified by an unstable `quaking` surface (JNCC Habitat code H7140) and;
- Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles (JNCC Habitat code H91A0).

#### 5.4.3 Conservation Objectives

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of the qualifying natural habitats;
- The structure and function (including typical species) of the qualifying natural habitats and;
- The supporting processes on which the qualifying natural habitats rely.

**5.4.4 List of operations that could potentially damage the special interests of the European Site include:**

- Agricultural activities;
- Fire and Fire Prevention;
- Human induced changes in hydraulic conditions;
- Outdoor sports, Leisure and Recreational Activities; *and*
- Air Pollution and air borne pollutants.

## 6.0 Initial Screening Opinion

### 6.1 The Screening Criteria

The first stage of an HRA is a test of Likely Significant Effect (Screening of Effects). This is essentially a risk assessment to decide whether a particular Policy or site can be effectively 'Screened out' from further, more detailed assessment or needs to go forward for more detailed Assessment. The essential question to ask is:

*"Is the Policy or the Site, either alone or in combination with other relevant Policies and Plans, likely to result in a significant effect upon the integrity of European sites?"*

In carrying out this Screening process the Assessment has considered the main possible sources of effects on the European sites arising from the implementation of the Plan, possible pathways to the European sites and the effects on possible sensitive receptors in the European sites. Where:

- The source is the direct or indirect changes (land take, emissions to air or water, hydrological changes) potentially occurring as a result of the development at an identified site.
- The pathway is the route or mechanism by which any likely significant effect would manifest in the environment and would reach the receptor.
- The receptor is the European Site and more specifically the qualifying features and conservation objectives for the site.

Only if there is an identifiable source, a pathway and a receptor is there likely to be a significant effect.

Possible sources and pathways for (unmitigated) effects used in the screening of potential policy impacts on European sites are considered to be:

- Water Pollution;
- Direct land Take;
- Air pollution resulting from increased vehicular emissions and industry;
- Increased recreational pressure;
- Loss and disturbance of functionally linked land;
- Introduction of invasive species;
- Noise and visual disturbance;
- Shading and light spillage

6.2 The results of the Screening are shown in the 'Screening Summary' tables below.

6.3 Each of the Policies has been assessed to determine whether they are:

- Unlikely to have an effect on a European Site – Screened Out;
- Could have a potential positive effect on a European Site – Screened Out;
- Could have a potential negative effect on a European Site – Screened In;
- Would be likely to have a significant negative effect on a European Site – Screened In.

Only Policies with potential negative effects or significant effects have been "Screened In" for further Assessment. This assessment has been made based on the content and type of each Policy and the HRA must be read together with the Plan.

- 6.4 The timescales over which effects (both stand-alone and in-combination) have been considered are the lifetime of the Plan and the lifetime of any proposals (including operational and restoration timescales) that may come forward during the Plan.

**Table 6.1 Initial Screening Summary of impacts of the Draft Oldham Local Plan (publication stage) on European sites**

Policies and site allocations screened into this Assessment identified in red text. Note appendices referred to under Policy description are not included.

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
<b>Homes</b>				
<b>H1</b>	<p>Delivering a Diverse and Sustainable Housing Offer</p> <p>The council will promote a diverse housing offer to meet the differing needs of all Oldham's residents. Oldham is required to deliver at least 11,560 homes over the period of 2022-2039, which equates to an average of 680 homes per year.</p>	<b>Homes / Housing</b>	<p>Possible impacts from –</p> <ul style="list-style-type: none"> <li>• Direct land take</li> <li>• Increases in diffuse air and water pollution</li> <li>• Increases in recreational impacts</li> </ul>	<b>Screened In</b>
<b>H2</b>	<p>Density of new Housing</p> <p>New residential developments should achieve the minimum densities set out in the Plan</p>	<b>Homes / Housing</b>	No likely significant effects	<b>Screened Out</b>
<b>H3</b>	<p>Housing Mix</p> <p>New residential developments should contribute to a diverse housing mix across the borough, ensuring that Oldham's housing needs can be met.</p>	<b>Homes / Housing</b>	No likely significant effects	<b>Screened Out</b>
<b>H4</b>	<p>Providing for Local Housing Needs</p> <p>The Local Plan will support the delivery of housing, which is suitable for residents with specialist housing needs, including housing suitable for older people, disabled people, looked after children and care leavers.</p>	<b>Homes / Housing</b>	No likely significant effects	<b>Screened Out</b>
<b>H5</b>	<p>Affordable Housing</p> <p>The Local Plan will ensure that a diverse type and tenure of affordable housing is provided to accommodate all households in need.</p>	<b>Homes / Housing</b>	No likely significant effects	<b>Screened Out</b>



POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
<b>Homes</b>				
<b>H6</b>	Homes in multiple occupation  Houses in Multiple Occupation (HMOs) will be supported, subject to set criteria	<b>Homes / Housing</b>	No likely significant effects	<b>Screened Out</b>
<b>H7</b>	Gypsies, Travellers and Travelling Showpeople  Proposals for Gypsies, Travellers and Travelling Showpeople sites will be supported where they are consistent with national and local guidance and policies and meet certain criteria:	<b>Homes / Housing</b>	No likely significant effects	<b>Screened Out</b>
<b>Economy and Employment</b>				
<b>E1</b>	Employment floorspace requirements  At least 57,481 sqm of office (E(g)(i)) floorspace and at least 240,656 sqm of industrial and warehousing (B2 and B8) floorspace will be provided in Oldham over the period of 2022-2039.	<b>Economy / Employment</b>	Possible impacts from – <ul style="list-style-type: none"> <li>• Direct land take</li> <li>• Increases in diffuse air and water pollution</li> </ul>	<b>Screened In</b>
<b>E2</b>	Business and Employment Areas  Promotes a range of sustainable employment areas to support the local economy. There is a strong emphasis on protecting and enhancing our existing employment areas	<b>Economy / Employment</b>	No likely significant effects	<b>Screened Out</b>
<b>E3</b>	Exceptions within Business and Employment Areas  Manages uses within business and employment areas	<b>Economy / Employment</b>	No likely significant effects	<b>Screened Out</b>

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
<b>E4</b>	<p>Employment sites outside of Business and Employment Areas</p> <p>Outside designated BEAs, the council will seek to retain existing employment sites in employment generating uses<sup>1</sup> to help to create a sustainable and competitive local economy, to ensure a diverse supply of employment sites and to maintain accessible employment opportunities for our residents.</p>	<b>Economy / Employment</b>	No likely significant effects	<b>Screened Out</b>
<b>E5</b>	Reuse and redevelopment of Mill buildings	<b>Economy / Employment</b>	No likely significant effects	<b>Screened Out</b>
<b>Centres</b>				
<b>C1</b>	<p>Our Centres</p> <p>Aims to promote and enhance the vitality and viability of the borough's centres, to ensure their long-term success. The centres hierarchy in Oldham is as follows:</p> <ol style="list-style-type: none"> <li>1. Oldham Town Centre;</li> <li>2. The borough's other centres of Chadderton, Failsworth, Hill Stores, Lees, Royton, Shaw and Uppermill; and</li> <li>3. Local Shopping Parades</li> </ol>	<b>Centres</b>	No likely significant effects	<b>Screened Out</b>
<b>C2</b>	<p>Protecting the vitality of our centres</p> <p>Uses for main town centre development outside of our existing centres will be resisted.</p>	<b>Centres</b>	No likely significant effects	<b>Screened Out</b>

<sup>1</sup> Employment generating uses are set out in Policy E2.

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
<b>C3</b>	<p>Changes of use and redevelopment within the boroughs centres</p> <p>The role of centres in meeting a wide range of local needs will be protected and enhanced. A strong retail function will be retained for each centre and will be complemented by a broad range of other services and facilities, including leisure and community uses.</p>	<b>Centres</b>	No likely significant effects	<b>Screened Out</b>
<b>C4</b>	<p>Local Services and Facilities</p> <p>Aims to facilitate the need for local shops and services, where appropriate and in line with other Local Plan policies, by protecting existing clusters of these premises and by permitting new local services and facilities within existing built-up areas.</p>	<b>Centres</b>	No likely significant effects	<b>Screened Out</b>
<b>Oldham Town Centre</b>				
<b>OTC1</b>	<p>Oldham Town Centre</p> <p>Proposals for the continued enhancement, redevelopment and regeneration of Oldham Town Centre will be supported where they align with and reflect local character areas:</p>	<b>Oldham Town Centre</b>	No likely significant effects	<b>Screened Out</b>
<b>OTC2</b>	Protecting and Enhancing Oldham Town Centre Conservation Area	<b>Oldham Town Centre</b>	No likely significant effects	<b>Screened Out</b>
<b>OTC3</b>	Creating a Better Public Realm for Oldham Town Centre	<b>Oldham Town Centre</b>	No likely significant effects	<b>Screened Out</b>

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
<b>OTC4</b>	Green Infrastructure within and around Oldham Town Centre	<b>Oldham Town Centre</b>	No likely significant effects	<b>Screened Out</b>
<b>OTC5</b>	Parking in Oldham Town Centre	<b>Oldham Town Centre</b>	No likely significant effects	<b>Screened Out</b>
<b>Addressing Climate Change</b>				
<b>CC1</b>	Renewable and Low Carbon Energy  Proposals for renewable and low carbon energy development including supporting infrastructure, will be supported where the following criteria have been appropriately addressed:	<b>Climate Change</b>	Potential impacts from direct land take (wind farms and solar farms), indirect disturbance and loss of functionally linked land	<b>Screened In</b>
<b>Flood Risk and Water Quality</b>				
<b>CC2</b>	Managing Flood Risk  Development proposals will be determined in line with national planning policy and guidance on Flood Risk, applying a sequential approach to all forms of current and future flood risk.	<b>Flood Risk and Water Quality</b>	No likely significant effects	<b>Screened Out</b>
<b>CC3</b>	Sustainable Drainage - Foul and Surface Water	<b>Foul and Surface Water</b>	No likely significant effects	<b>Screened Out</b>
<b>CC4</b>	Water efficiency and climate change  Aims to require all new residential developments to achieve as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates. Non-residential development will be required to achieve five credits for category Wat 01 of BREEAM unless demonstrated impracticable.	<b>Water Efficiency</b>	No likely significant effects	<b>Screened Out</b>

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
<b>CC5</b>	Groundwater source protection zones  Where necessary, development proposals must include measures to reduce any risk to the water environment and aim to protect and improve water quality.	<b>Protection of groundwater</b>	No likely significant effects	<b>Screened Out</b>
<b>Natural Environment and Open Land</b>				
<b>OL1</b>	Consideration for the Peak District National Park  Development within the planning boundary of Oldham Borough will be permitted where it does not conflict with the purposes of the Peak District National Park. Where possible, opportunities to further the purposes of the Peak District National Park will be sought.	<b>Natural Environment and Open Land</b>	No likely significant effects	<b>Screened Out</b>
<b>OL2</b>	Protecting Oldham's Green Belt  The openness and permanence of Oldham's Green Belt will be preserved, in line with national planning policy. Within the Green Belt, national planning policy will be applied including the refusal against inappropriate development except in very special circumstances	<b>Green Belt</b>	No likely significant effects	<b>Screened Out</b>
<b>OL3</b>	Extensions and alterations to existing buildings within the Green Belt	<b>Green Belt</b>	No likely significant effects	<b>Screened Out</b>
<b>OL4</b>	Local Green Spaces	<b>Local Green Spaces</b>	No likely significant effects	<b>Screened Out</b>
<b>OL5</b>	Protecting dark skies and tranquillity	<b>Dark Skies</b>	No likely significant effects	<b>Screened Out</b>

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
<b>Addressing the Biodiversity Emergency</b>				
<b>N1</b>	Protecting Nature  The borough's hierarchy for designated sites and wider ecological networks is identified and will be safeguarded in line with national policy	<b>Biodiversity</b>	Likely positive effects on European sites	<b>Screened Out</b>
<b>N2</b>	Restoring Nature  A net increase in biodiversity will be achieved across the borough. Development will have regard to the Greater Manchester Local Nature Recovery Strategy and should seek to support and deliver on the priorities and actions for nature recovery within the strategy.	<b>Biodiversity</b>	Likely positive effects on European sites	<b>Screened Out</b>
<b>N3</b>	Enhancing Green Infrastructure through development  New development is expected to make an appropriate contribution to addressing local needs and opportunities for Green Infrastructure provision by retaining, enhancing and creating green spaces and corridors.	<b>Green Infrastructure</b>	Likely positive effects on European sites	<b>Screened Out</b>
<b>N4</b>	Trees  Development proposals are required to aim to protect and retain tree cover within a development site.	<b>Trees</b>	No likely significant effects	<b>Screened Out</b>
<b>Oldham's Historic Environment</b>				
<b>HE1</b>	The Historic Environment  Development proposals that positively conserve and where appropriate enhance the historic environment, heritage assets and their setting, will be supported	<b>Historic Environment</b>	No likely significant effects	<b>Screened Out</b>
<b>HE2</b>	Securing the Preservation and Enhancement of Oldham's Heritage Assets	<b>Historic Environment</b>	No likely significant effects	<b>Screened Out</b>

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
HE3	<p>Development proposals affecting Conservation Areas</p> <p>Proposals affecting a conservation area should preserve or enhance those elements which contribute to its character and appearance especially any elements identified in Conservation Area Appraisals as making a positive contribution to the significance of that area</p>	Historic Environment	No likely significant effects	Screened Out
HE4	<p>Oldham's Mills</p> <p>The council will proactively support, through planning decisions and in fulfilling its wider functions, proposals that establish a positive future for Oldham's Textile Mills through their reuse and repair</p>	Historic Environment	No likely significant effects	Screened Out
HE5	<p>Canals</p> <p>The Huddersfield Narrow Canal and Rochdale Canal will be protected as heritage assets (designated and non-designated heritage), which contribute to the borough's sense of place.</p> <p>To ensure that the future restoration of the canals is enabled, development alongside the line of the canal and towpath shall not prevent its restoration, conservation and enhancement of the waterway's heritage and built environment.</p>	Historic Environment	Potential impacts on the Rochdale Canal SAC during any restoration	Screened In
High Quality Design				
D1	Achieving High Quality Design	Design	No likely significant effects	Screened Out
D2	Advertisements, Signage and Shop Fronts	Design	No likely significant effects	Screened Out
D3	Creating a Better Public Realm	Design	No likely significant effects	Screened Out

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
<b>D4</b>	Extensions and alterations to, and development within the curtilage of, a dwellinghouse	<b>Design</b>	No likely significant effects	<b>Screened Out</b>
<b>Sustainable, Active and Accessible Networks</b>				
<b>T1</b>	Delivering Oldham's Transport Priorities Promotes sustainable transport in the Borough	<b>Sustainable, Active and Accessible Network</b>	No likely significant effects	<b>Screened Out</b>
<b>T2</b>	Travel Hubs and Park and Ride Facilities	<b>Sustainable, Active and Accessible Network</b>	No likely significant effects	<b>Screened Out</b>
<b>T3</b>	Parking Provision	<b>Sustainable, Active and Accessible Network</b>	No likely significant effects	<b>Screened Out</b>
<b>T4</b>	Electric Vehicle Charging Infrastructure	<b>Sustainable, Active and Accessible Network</b>	No likely significant effects	<b>Screened Out</b>
<b>Sustainable, Active and Accessible Networks</b>				
<b>T5</b>	Vision-led Transport Statements, Transport Assessments and Travel Plans in New Development	<b>Sustainable, Active and Accessible Network</b>	No likely significant effects	<b>Screened Out</b>
<b>Communities</b>				



POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
<b>C01</b>	The Protection of Open Space, Sport and Recreation Provision	<b>Communities</b>	No likely significant effects	<b>Screened Out</b>
<b>C02</b>	New and Improved Open Space, Sport and Recreation Provision	<b>Communities</b>	No likely significant effects	<b>Screened Out</b>
<b>C03</b>	Community Facilities	<b>Communities</b>	No likely significant effects	<b>Screened Out</b>
<b>C04</b>	Education and Skills	<b>Communities</b>	No likely significant effects	<b>Screened Out</b>
<b>C05</b>	Securing Educational Places through New Residential Development	<b>Communities</b>	No likely significant effects	<b>Screened Out</b>
<b>C06</b>	New Development and Health	<b>Communities</b>	No likely significant effects	<b>Screened Out</b>
<b>C07</b>	Hot food takeaways and fast food outlets	<b>Communities</b>	No likely significant effects	<b>Screened Out</b>
<b>Protecting Our Local Environment</b>				
<b>LE1</b>	Ensuring a high standard of amenity in new development	<b>Local Environment</b>	No likely significant effects	<b>Screened Out</b>
<b>LE2</b>	Ground conditions and contaminated land	<b>Local Environment</b>	No likely significant effects	<b>Screened Out</b>
<b>LE3</b>	Air quality  The council will seek to improve air quality within the borough and contribute towards the achievement of national air quality objectives and Greater Manchester's Clean Air Plan.	<b>Local Environment</b>	No likely significant effects – possible positive effects	<b>Screened Out</b>

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
<b>Infrastructure and Delivery in Oldham</b>				
<b>IN1</b>	Digital infrastructure and telecommunications	<b>Infrastructure and Delivery</b>	No likely significant effects – possible positive effects	<b>Screened Out</b>
<b>IN2</b>	Planning obligations	<b>Infrastructure and Delivery</b>	No likely significant effects – possible positive effects	<b>Screened Out</b>
<b>IN3</b>	Delivering social value and inclusion	<b>Infrastructure and Delivery</b>	No likely significant effects – possible positive effects	<b>Screened Out</b>
<b>Monitoring</b>				
<b>M1</b>	Monitoring Framework	<b>Monitoring</b>	No likely significant effects – possible positive effects	<b>Screened Out</b>

## 6.0 Summary of Policies Screened In

6.1 The following Policies have been provisionally 'Screened In' to the Assessment because it is considered that the implementation of these Policies may have harmful effects on the special interest of one or more European protected sites -

- H1 – Delivery of a Diverse and Sustainable Housing Offer
- E1 – Provision of Employment Floorspace Requirements
- CC1 – Renewable and Low-Carbon Energy
- HE5 - Canals

The Policies 'Screened In' relate to

- the aspiration for the Plan to deliver significant numbers of new homes within the Borough,
- the aspiration for the Plan to deliver economic growth within the Borough,
- renewable and low-carbon energy developments in the Borough, including wind and solar energy developments
- potential restoration and development of the Rochdale Canal SAC

The Policies have been Screened In because they are considered to have some potential to cause effects through –

- direct habitat losses,
- increased habitat and species disturbance,
- increases in diffuse air pollution,
- increases in diffuse water pollution,
- increases in recreational pressures,
- disturbance to functionally linked land,
- visual and noise disturbance,
- introduction of invasive plant species.

6.2 The details of the potential effects of the above impacts and the consequent effects on European sites are difficult to empirically determine at this time and at this stage of Plan production. Rather, it is the *broad principle* of whether the scale and type of development planned for Oldham can be implemented without harming the special interest of any European Protected Sites that is being tested in this Assessment.

When preparing HRAs for projects it is normally anticipated that where developments are 'Screened In' to the appraisal they will then be subject to more detailed Assessment and consideration of detailed available mitigation measures. This approach is often not possible for Strategic Plans, at least at this draft stage of Plan production, because full details of particular developments and details of the effects of potential mitigation measures are not yet available. Rather, the Screening exercise provides indications of where future Assessments may need to be considered, whether Policies need to be added or removed

from the Plan or substantially amended, and also indicates areas where future Assessments can be ruled out.

In addition, recommendations can be made at this stage about further necessary safeguards that should be incorporated into the Plan to ensure that no harm will result to European sites from the scale and type of development planned.

Taking the precautionary approach recommended in the legislation, further Screening and Assessment will be required as further stages of the Plan and as details of plan implementation become available.

6.3 There are also significant integrated safeguards in other Policies in the Plan such that the special interest of the European sites concerned should be able to be protected and enhanced. This is a Plan with strong 'green' credentials and with sustainability at its heart.

6.3.1 Policies that have in-built measure to potentially mitigate negative effects or are Generally positive to European Sites include:

- N1 Protecting Nature
- N2 Restoring Nature
- N5 Enhancing Green Infrastructure
- CC2 and CC3 – aim to improve water quality
- LE3 – Aims to improve air quality

6.4 The following impact pathways that could affect the integrity of European sites arising from the Plan have however been identified.

- Recreational pressure – pathways to Rochdale Canal SAC (boat traffic), South Pennines SPA/SAC,
- Air quality – vehicular pathway to Manchester Mosses SAC (primarily to Holcroft Moss which is adjacent to the M62 motorway) and the South Pennines SPA/SAC,
- Water quality – pathways to the Rochdale Canal SAC,
- Impacts on functionally linked land – South Pennines SPA/SAC,
- Direct habitat losses – South Pennines SPA/SAC and Rochdale Canal SAC,
- Habitat and Species disturbance – South Pennines SPA/SAC and Rochdale Canal SAC
- Light spillage and shading – Rochdale Canal SAC
- Spread of invasive species – Rochdale Canal SAC

6.5 A stage 2 Appropriate Assessment is therefore required of the potential LSE identified.

## 7.0 Appropriate Assessment

7.1 The screening process has identified the following sources of likely significant effect on European sites and functionally linked land:

- Recreational pressure – pathways to Rochdale Canal SAC (boat traffic), South Pennines SPA/SAC,
- Air quality – vehicular pathway to Manchester Mosses SAC (primarily to Holcroft Moss which is adjacent to the M62 motorway) and the South Pennines SPA/SAC,
- Water quality – pathways to the Rochdale Canal SAC,
- Impacts on functionally linked land – South Pennines SPA/SAC,
- Direct habitat losses – South Pennines SPA/SAC and Rochdale Canal SAC,
- Habitat and Species disturbance – South Pennines SPA/SAC and Rochdale Canal SAC
- Light spillage and shading – Rochdale Canal SAC
- Spread of invasive species – Rochdale Canal SAC

## 7.2 Air Quality

7.2.1 The air pollutants most likely to have a significant effect on European sites are the oxides of nitrogen (NO<sub>x</sub>) resulting from traffic emissions. Modern regulation of commercial emissions makes any other form of air pollutant extremely unlikely.

7.2.2 NO<sub>x</sub> deposition results in an increase in nitrates and can have a significant impact on certain habitats including lowland mosses and upland blanket bogs. Open water habitats can also be susceptible where the importance is linked to low nutrient levels in the water.

7.2.3 NO<sub>x</sub> can also impact existing vegetation by lowering the pH *i.e.* acidification analogous to the acidification caused by high levels of SO<sub>2</sub> to the South Pennines from coal fires.

7.2.4 Studies indicate that the main impact of NO<sub>x</sub> is when within 200m of a pollution source *i.e.* road or major transport depot.

### Manchester Mosses SAC

7.2.5 This habitat type is considered sensitive to changes in air quality, especially acidity and nitrogen. Critical values are currently being exceeded at this SAC (APIS, 2016).

Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it.

7.2.6 The part of this SAC most at risk is Holcroft Moss as it lies immediately adjacent to the M62 with an estimated 129,000 vehicle movement per day between the M6 and M60 in 2024. As the critical nitrogen and NO<sub>x</sub> levels are already regarded as above the critical load for the Manchester Mosses, theoretically any increase in road traffic along the M62 as a result of the operation of the Oldham Local Plan could have a negative impact on this part of the SAC. Both Risley Moss and Bedford Moss are located at significant distance

from any trunk road and are unlikely to be impacted upon by traffic issues originating as a result of the Plan.

7.2.7 Policies promoting the economic growth of Oldham and housing growth could theoretically increase traffic levels on this section of the M62 to and from Oldham.

7.2.8 Air quality modelling was undertaken for the Places for Everyone large scale strategic plan for Greater Manchester. This modelling concluded that developments within Greater Manchester (including Oldham) when acting in combination with developments in Warrington could cause LSE on Holcroft Moss by increasing emissions from traffic flow along the M62. In response to this identified LSE mitigation for air quality impacts was proposed in the form of the Supplementary Planning Document "*Holcroft Moss Planning Obligations Joint Supplementary Planning Document – May 2025*" adopted by the nine Places for Everyone authorities in consultation with Natural England. Mitigation for potential air pollution effects is also provided through Places for Everyone Policy JP-C8 (in particular criterion 17).

7.2.9 This SPD provides guidance on when mitigation in the form of developer contributions to the positive management of the Manchester Mosses SAC will be required for Holcroft Moss as a result of additional vehicle movements along the M62 corridor past Holcroft Moss. (between junction 11 Birchwood and Junction 12 Worsley). The triggers are 100 vehicles or 20 HGV's per day.

7.2.10 As Oldham has already adopted this SPD, and the PfE plan has already accounted for the quantum of development anticipated for Oldham up to 2039, it is reasonable to use the same criteria to assess housing and employment figures set out in the Oldham Local Plan. Any development likely to increase traffic in excess of 100 vehicles or 20 HGV's should therefore provide mitigation as agreed in the SPD. Taking this into account, the adopted SPD and Policies integral both to the Local Plan and to PfE will effectively mitigate air pollution effects.

7.2.11 Integral Policies in the Plan including Policies N1, N2 and LE3 will also act to protect European sites from air pollution effects.

### **South Pennine Moors SPA & SAC**

7.2.12 As with the Manchester Mosses SAC habitats within the above SAC are known to be particularly susceptible to nitrogen inputs, and in places on the Moors nitrate loads are known to exceed critical thresholds for harm (given as 5-10 kg N/ha/yr for blanket bog, *source – Apis*).

7.2.13 The M62 and other routes crossing the Pennines running close to sensitive habitats and takes a significant amount of traffic from Greater Manchester. Traffic modelling (screening) undertaken to inform the Places for Everyone Plan has identified that the Plan may cause effects on the South Pennine Moors Phase 1 European site from increased traffic flows.

7.2.14 Development in Oldham will be contributing towards this, particularly employment sites, reliant on freight transport using HGV's to source materials and distribute their products.

7.2.15 However Places for Everyone has not identified any strategic allocations within Oldham as having likely significant effects on the South Pennines SAC/SPA and concluded that the overall Plan would not have any likely significant effects on the SAC/SPA.

7.2.16 Integral Policies in the Plan including Policies N1, N2 and LE3 will also act to protect European sites from air pollution effects.

It is therefore reasonable to conclude no likely significant effect will occur to South Pennine Moors SPA/SAC from any reduction in air quality resulting from the Plan in isolation.

### **7.3 Recreational Pressure**

7.3.1 The impact of recreational pressure varies dependent on the habitat and the qualifying species, some habitats being quickly physically damaged by trampling, other sensitive to nutrient inputs from dog fouling and other holding qualifying species sensitive to disturbance.

7.3.2 The likelihood of recreational pressure also varies depending on the nature of the site, with upland habitats likely to attract recreational visits from a greater distance than other habitats and sites promoted as recreational destination, likely to attract visitors from even greater distance Those with no official public access or deemed as potentially dangerous are only likely to attract local residents and naturalists.

#### **South Pennine Moors SPA/SAC**

7.3.3 Natural England have stated that there is insufficient evidence to demonstrate that recreational activities are having any effect on the special interest of the South Pennine Moors designated sites (*ref. letter dated 7<sup>th</sup> August 2024 from Natural England to the GMCA, [South Pennine Moors Special Area of Conservation \(SAC\) / Special Protection Areas \(SPAs\) Joint Supplementary Planning Document](#)* ).

#### **Manchester Mosses SAC**

7.3.4 Mosslands are habitats that do not normally attract significant recreational visits owing to being waterlogged and difficult to walk over. There is also the public perception that such sites are dangerous. Currently there is no public access to Astley and Bedford Mosses or Holcroft Moss, with Risley Moss managed by rangers employed by Warrington Borough Council.

7.3.5 Of the distinct parts to the Manchester Mosses SAC, Astley and Bedford Mosses is more than 20km from the boundary with Oldham, with Holcroft Moss and Risley Moss located more than 20km respectively as the crow flies to the nearest point of the Oldham borough.

7.3.6 Given the above factors it is considered that no Likely Significant Effects will be caused to the Manchester Mosses SAC by increased recreational development arising from development in Oldham.

#### **Rochdale Canal SAC**

7.3.7 The Rochdale Canal SAC supports important populations of aquatic plants which can be harmed by increases in boat traffic. Development within Oldham, particularly proposals to restore or develop the Canal, could attract more boat movements along the Canal. However, the Canal and River Trust own and manage the Canal and control boat movements along the Canal. The Canal is managed with its important nature conservation value borne in mind. Populations of important plants are regularly monitored and measures can be implemented to restrict boat movements should harm be recorded.

7.3.8 Given the above factors it is considered that no Likely Significant Effects will be caused by increased recreational development arising from development in Oldham.

## **7.4 Water Quality**

- 7.4.1 Negative effects on European sites can be due to a lowering of water quality i.e. pollution leading to higher mortality of qualifying species, food sources they are reliant on or through accumulation of pollutants; changes in nutrient status such as raised levels of nitrate or phosphate, leading to a change in the vegetation structure of the European site and potentially any qualifying species and; changes in water clarity through increase sediment load or increase levels of algae in the water.
- 7.4.2 Generally for such an impact to occur there needs to be a hydrological pathway such as a water course or ground water. European sites with direct hydrological connectivity to Oldham include the Rochdale Canal SAC and the South Pennine Moors SAC/SPA.
- 7.4.3 In the case of the Rochdale Canal SAC Policies N1, CC2 and CC3 will act to adequately mitigate for any possible harm to the Canal.
- 7.4.4 In the case of the South Pennine Moors, it is noted that water flow is from the Moors down into more urban areas. There is no possibility of contaminated water flowing into the designated site from new developments, and currently no new development is planned for within the designated sites.
- 7.4.5 Should any development be proposed in future within the designated site, Policies N1, CC2 and CC3 will act to adequately mitigate for any possible harm which could arise from water pollution effects.

## **7.5 Direct Habitat Losses**

- 7.5.1 Currently no new significant development is planned within Oldham which could lead to direct habitat losses to European sites.
- 7.5.2 Should any development be proposed in future within designated sites leading to direct habitat losses, Policies N1, CC2 and CC3 will act to adequately mitigate for any possible harm which could arise.

## **7.6 Direct loss and disturbance of Functionally Linked Land within Oldham.**

- 7.6.1 Functionally linked land is land utilised by significant numbers of the qualifying species associated with a European site on a regular basis that is not part of the European site.
- 7.6.2 This most often applies to sites where birds are the qualifying species and forage or roost off-site. It could also apply to great crested newts that may move off-site in the winter to hibernate or to forage.
- 7.6.3 With regards to the Draft Oldham Local Plan (publication stage), only birds are screened in as mobile species most likely associated with designated sites (most particularly the South Pennine Moors SPA/SAC)
- 7.6.4 Currently there is no definitive map of potential functionally linked land within Oldham Borough. However, given the ecology of the notable bird species most likely to be involved it is reasonable to assume that functionally linked land will be close to the boundary of designated sites and will not be close to significant settlements or substantive built development. The South Pennine Moors Special Area of Conservation (SAC) / Special Protection Areas (SPAs) Joint Supplementary Planning Document prepared and adopted by Oldham Council, Rochdale Council and Tameside Council in 2025 provides safeguards for developments within 2.5 km of the Moors and requires development within this area to carry out project-based surveys and assessments. In



addition, Policy JP-G5 (criterion 7) of the Places for Everyone Plan will act to mitigate effects on functionally linked land.

7.6.5 Policy N1 will also serve to mitigate for any potential impacts on functionally linked land.

7.6.6 It is concluded that sufficient mitigation is in place to avoid any likely significant effects on functionally linked land within Oldham.

## **7.7 Habitat and Species Disturbance**

**7.7.1** This impact which could affect plant communities in the Rochdale Canal SAC will be effectively mitigated by Policy N1.

### **7.7.2 Spread of invasive species**

This impact which could affect plant communities in the Rochdale Canal SAC will be effectively mitigated by Policy N1.

## **7.8 Light spillage and shading**

7.8.1 This impact which could affect plant communities in the Rochdale Canal SAC will be effectively mitigated by Policy N1.

## **8.0 Consideration of 'In Combination' Effects with Other Plans and Proposals**

8.1 The Habitats Regulation Assessment must consider the likely significant effect of the Plan in relation to other proposals and plans current or planned within the relevant administrative area, other administrative authorities and prepared by other statutory organisations (e.g. Environment Agency, United Utilities) and in combination with the identified effects of those Plans.

Cumulative effects for air quality, recreational pressure, water quality, hydrology and indirect effects on functionally linked land have been considered. There are unlikely to be cumulative effects for direct loss of functionally linked land, light spillage and shading, spread of invasive species or disturbance.

## **8.2 Air Quality**

### **South Pennines SPA/SAC**

8.2.1 Places for Everyone concluded that the cumulative impact of the Plan could result in slight increases in airborne pollution to parts of this extensive site along the A6024, A627 and A57. The A57 and A6024 are the Snake and Woodhead Passes across the Pennines. However, the PfE HRA also concluded that the increases in airborne pollutants would not affect any notable habitats and species associated with European sites.

8.2.2 Integrated Policies N1 and LE3 within the Plan will also mitigate any possible air pollution effects.

8.2.3 I am therefore satisfied that there are no likely significant in-combination to the South Pennines SAC/SPA as a resulting from traffic generated by the Publication Oldham Local Plan.

## **Manchester Mosses SAC**

8.2.4 Places for Everyone screened in air quality for the Manchester Mosses SAC, accepting that critical loads were already breached for Holcroft Moss and that the additional development across the nine PfE and Warrington Districts would add to this. The Warrington Local Plan also screened in the Manchester Mosses SAC because of additional traffic movements past Holcroft Moss. The Publication Oldham Local Plan will add further traffic movements. There is therefore the potential for a likely significant effect in-combination with the development proposals within Places for Everyone and the Warrington Local Plan as well as other local plans in preparation across Greater Manchester.

8.2.5 However an SPD has been produced by the nine local authorities involved in PfE, including Oldham Council, which provides measures to mitigate for the increased traffic movements resulting from development proposals in Places for Everyone and the Warrington Local Plan. As Oldham Council has adopted this SPD, which has been agreed with Natural England, providing that the agreed measures in the SPD are applied to development in Oldham no likely significant effects on the Manchester Mosses SAC will occur in-combination.

### **8.3 Recreational Pressure**

8.3.1 Whilst increased recreational pressure due to visitors from Oldham has been screened out as having no likely significant effects on any European sites in isolation, this does not necessarily mean that in combination with other plans a significant effects could not occur.

8.3.2 The relevant sites with pathways for recreational disturbance effects from Oldham are the South Pennines SPA/SAC and the Rochdale Canal SAC. As previously discussed, Natural England have stated that there is currently no empirical evidence that recreational disturbance is having significant effects on the South Pennines, and recreational pressures on the Rochdale Canal SAC are tightly controlled by the Canal and River Trust.

8.3.3 It is concluded that in-combination effects resulting from recreational pressure will not occur.

### **8.4 Water Quality**

8.4.1 Whilst deterioration due to water pollutants originating from Oldham has been screened out as having no likely significant effects on any European sites, this does not mean that in combination with other plans could not result in significant effects occurring.

8.4.2 The sites with pathways from Oldham include the Rochdale Canal SAC and the South Pennine Moors SPA/SAC.

8.4.3 Integrated Policies CC2, CC3 and N1 will serve to control water pollution in the Rochdale Canal SAC. There will therefore be no cumulative effects.

8.4.4 Given the remoteness of the South Pennine moors designated sites, the fact that water flows are generally away from the Moors, and the operation of integrated Policies CC2, CC3 and N1, I would conclude that no cumulative effects will occur.

### **8.6 Indirect effects on Functionally Linked Land**

8.6.1 The South Pennine Moors Joint SPD prepared by Oldham Council, Rochdale Council and Tameside Council will effectively mitigate for any potential in-combination indirect effects on functionally linked land.

8.6.2 I am therefore satisfied that there are no likely significant in-combination effect to functionally linked land as a result of in-combination disturbance with the Publication Oldham Local Plan

## 9.0 Summary and Recommendations

- 9.1 Stage 1 of the HRA of effects of the Oldham Local Plan (publication stage) on European designated sites established that there were pathways to the following European sites that could potentially cause Likely Significant Effects from the operation of certain Policies in the Plan -
- Manchester Mosses SAC
  - Rochdale Canal SAC
  - South Pennine Moors SPA/SAC
- 9.3 A number of the Policies within the Plan were initially identified (Screened In) as potentially having a likely significant effect (LSE) on European Sites due to one or more of the following:
- Water Pollution
  - Air pollution resulting from vehicular emissions and industry;
  - Increased recreational pressure,
  - Direct habitat loss,
  - Indirect disturbance,
  - Loss of functionally linked land,
  - Light spillage and shading,
  - Spread of invasive species,
- 9.2 Further, more detailed Assessment of the possible effects of the operation of these Policies on the European Sites identified in the Screening process has been undertaken, both alone and in combination with other relevant plans and policies.
- 9.5 It was concluded that development managed by the Draft Oldham Local Plan (publication stage) has the potential to cause likely significant effects on European sites in the absence of mitigation.
- 9.6 Mitigation for identified LSE is available, comprising –
- Holcroft Moss SPD
  - South Pennine Moors SPD
  - Integrated Plan Policies N1, N2, N3, CC2, CC3 and LE3
  - Places for Everyone Policies including JP-G5 and JP-C8
- 9.7 Following consideration of the available mitigation it has been concluded that, providing the available mitigation is applied appropriately, the operation of the Draft Oldham Local Plan (publication stage) will not have any effects on the integrity of any European designated sites.
- 9.8 It is recommended that if any changes are made to the Policies in the Plan as a result of either the public consultation or during the Examination in Public, then the HRA will need to be revisited and revised to ensure that these changes would not result in effects on the integrity of any European designated sites.
- 9.9 It is recommended that any development proposals which have the potential to cause foul and surface water discharges to water-sensitive designated sites should be subject to project-level HRA.

## References

1. Warrington Borough Council Updated Proposed Submission version Local Plan: Amended HRA – August 2021 AECOM
2. Habitats Regulations Assessment of the Places for Everyone Joint Development Plan (submission) – February 2022 – GMEU
3. Holcroft Moss Planning Obligations Joint Supplementary Planning Document May 2025
4. South Pennine Moors SAC/SPA Joint Supplementary Planning Document May 2025
5. Annual Lockage Report 2024 - Canal & River Trust 2025

## Appendix 1 – Location of European Sites

**Figure 1 – Location of European Sites within 20 km of Oldham**

