

# **Oldham Local Plan**

**Publication Plan: Addressing the  
Biodiversity Emergency Topic Paper**

**January 2026**



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## 1. Introduction and Purpose

- 1.1. This is the Addressing the Biodiversity Emergency Topic Paper and is one of 13 topic papers produced to inform the consultation on the Oldham Local Plan: Publication Plan.
- 1.2. All Topic Papers can be found online at [Oldham Council's website](https://www.oldham.gov.uk/info/201233/local_plan_review)<sup>1</sup>.
- 1.3. The main purpose of the Topic Paper is to set out:
  - the current key policies, plans and strategies relating to Addressing the Biodiversity Emergency that have informed the Local Plan;
  - the main issues, challenges and opportunities relating to Addressing the Biodiversity Emergency that we face in Oldham, underpinned by proportionate and relevant evidence;
  - how policies within the Oldham Local Plan: Publication Plan have been shaped, having regard to:
    - the key issues, challenges and opportunities facing the borough in relation to biodiversity;
    - responses received as part of the Oldham Local Plan: Draft Plan consultation and Duty to Co-operate discussions;
    - the outcomes of the Integrated Assessment, including any requirements of the Habitat Regulations Assessment; and
  - how, with these policies, the Plan sets out an appropriate strategy that is based on proportionate evidence.
- 1.4. The Setting the Scene Topic Paper sets out the context for the Oldham Local Plan: Publication Plan, its purpose and how it relates to the Places for Everyone Joint Development Plan Document.
- 1.5. The Topic Papers therefore support and complement the Oldham Local Plan: Publication Plan, demonstrating how policy choices have been informed, providing transparency around decision-making, and assisting those viewing the plan and the examining Inspector in understanding the rationale behind the Plan's content.

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<sup>1</sup> Oldham Council's website - Local Plan Review is available at:  
[https://www.oldham.gov.uk/info/201233/local\\_plan\\_review](https://www.oldham.gov.uk/info/201233/local_plan_review)

## 2. Relevant Policies, Plans and Strategies

2.1. This section sets out the main policies, plans and strategies that relate to Addressing the Biodiversity Emergency and which have informed the policy approach taken.

### National Context

#### National Planning Policy Framework

2.2. Chapter 15 of [National Planning Policy Framework \(NPPF\)](#)<sup>2</sup> (December 2024, as amended in February 2025) addresses conserving and enhancing the natural environment.

2.3. It states planning policies should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.

2.4. Plans should: distinguish between the hierarchy of international, national and locally designated sites; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

2.5. NPPF goes on to say to protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- b) promote the conservation, restoration and enhancement of priority habitats,

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<sup>2</sup> National Planning Policy Framework (December 2024, as amended February 2025), available at: [https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF\\_December\\_2024.pdf](https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf)

ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

- 2.6. Chapter 12 of NPPF outlines the importance that trees can make to the character and quality of urban environments and help mitigate climate change. Planning policies should ensure that new streets are tree-lined.

### **National Planning Policy Guidance**

- 2.7. Planning Practice Guidance on Natural Environment<sup>3</sup> (updated June 2025) is most relevant to this topic paper. It covers the following guidance:

#### Brownfield Land of Environmental Value

- 2.8. The guidance outlines that some previously developed or 'brownfield' land is of high environmental value, providing habitats for protected or priority species and other environmental and amenity benefits.
- 2.9. Not all brownfield sites of high environmental value are designated as sites of importance for biodiversity. Defra has published information on Open Mosaic Habitats, a type of priority habitat that is of high ecological value which occurs on brownfield land. Natural England's Open Mosaic Habitat Inventory can be used as the starting point for detailed assessments.

#### Green Infrastructure

- 2.10. The Natural Environment guidance explains what green infrastructure includes and why it is important.
- 2.11. It adds that strategic policies can identify the location of existing and proposed green infrastructure networks and set out appropriate policies for their protection and enhancement. To inform these, and support their implementation, green infrastructure strategies prepared at a district-wide scale (or wider) can be a useful tool. These need to be evidence-based and include assessments of the quality of current green infrastructure and any gaps in provision.
- 2.12. The green infrastructure strategy can inform other plan policies and infrastructure delivery requirements.

#### Biodiversity, Geodiversity and Ecosystems

- 2.13. Section 40 of the Natural Environment and Rural Communities Act 2006 places a duty on all public authorities in England and Wales to have regard, to the purpose of conserving and enhancing biodiversity. A key purpose of this duty is to embed consideration of biodiversity as an integral part of policy and decision making throughout the public sector, which should be seeking to make a significant

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<sup>3</sup> Planning Practice Guidance on Natural environment is available at:  
<https://www.gov.uk/guidance/natural-environment>

contribution to the achievement of the commitments made by government in its Environmental Improvement Plan.

- 2.14. Development plans and planning decisions have the potential to affect biodiversity or geodiversity outside as well as inside relevant designated areas.
- 2.15. When planning for biodiversity, local planning authorities must have regard to Local Nature Recovery Strategies, because they will establish local priorities for biodiversity and other environmental benefits and identify locations where biodiversity enhancement would be particularly beneficial.
- 2.16. Information in Local Nature Recovery Strategies will enable development plans to better recognise the areas where habitat management, enhancement, restoration or creation would be particularly beneficial, including for strengthening ecological networks and delivery of wider environmental outcomes such as flood risk management, climate change mitigation or an improved water environment.
- 2.17. Planning authorities also need to consider the opportunities that individual development proposals may provide to conserve and enhance biodiversity and geodiversity and contribute to habitat connectivity in the wider area.
- 2.18. The Nature Recovery Network is an expanding and increasingly connected network of wildlife-rich habitat across England. It comprises a core network of designated sites of importance for biodiversity and adjoining areas that function as stepping stones or wildlife corridors, areas identified for new habitat creation and up to 25 nature recovery areas for targeted action.
- 2.19. Local ecological networks can make a significant contribution to developing the Nature Recovery Network. Local ecological networks can be identified and mapped as a part of the plan-making process, with policies identifying appropriate levels of protection and opportunities to create, restore or enhance habitats or improve connectivity.
- 2.20. The National Planning Policy Framework expects development proposals to bolster wildlife by incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.

#### Biodiversity Net Gain

- 2.21. Biodiversity net gain is a requirement which was introduced in the Town and Country Planning Act 1990 by the Environment Act 2021. Where it applies developers must demonstrate how a development will deliver at least a 10% increase in biodiversity.
- 2.22. Plans, and particularly those containing strategic policies, can be used to set out a suitable approach to net gain net gains in biodiversity, how they will be achieved, and which areas present the best opportunities to deliver gains. Consideration may also be given to local sites including where communities could benefit from improved access to nature.

## Trees and Woodland

- 2.23. Well-placed and well-chosen trees on streets and in urban spaces can provide a range of benefits: encouraging walking and enhanced physical and mental health; contributing to local environmental character and distinctiveness; providing habitats for wildlife; reducing noise and excessive heat; and supporting sustainable drainage. Changing climate, in particular hotter summers and more frequent periods of dry weather, and unknown pests and diseases, will place new pressures on green infrastructure in the long-term, so trees of the right species and age profile are essential.
- 2.24. Local planning authorities need to consider both the direct and indirect impacts on ancient woodland and ancient or veteran trees when assessing development proposals and the scope for avoiding or mitigating adverse impacts.

## Local Nature Recovery Strategies

- 2.25. Local Nature Recovery Strategies (LNRS) are a system of spatial strategies for nature and environmental improvement required by law under the Environment Act 2021.
- 2.26. Section 40 of the Natural Environment and Rural Communities Act (as amended by the Environment Act 2021) places a duty on all public authorities who operate in England to consider how they can conserve and enhance biodiversity. In complying with this duty all public authorities must “have regard” to any relevant LNRS.
- 2.27. Local Nature Recovery Strategies are intended to support local planning authorities in preparing local plans that conserve and enhance biodiversity and the natural environment, and local planning authorities have a legal duty to have regard to the relevant strategy for their area. Local planning authorities should consider the priorities set out in the relevant LNRS when determining how their local plan should contribute to and enhance the local and natural environment.
- 2.28. Paragraph 192(a) of the National Planning Policy Framework states that plans should identify, map and safeguard areas identified by national and local partnerships for habitat management, enhancement, restoration or creation. Local Nature Recovery Strategies are prepared through local partnerships (involving all local planning authorities) established under a national legislative framework and will identify and map proposed areas for habitat management, enhancement, restoration and creation for biodiversity and the wider natural environment.
- 2.29. Local planning authorities should be aware of those areas mapped and identified in the relevant LNRS and the measures proposed in them and consider how these should be reflected in their local plan. In doing so, they should consider what safeguarding would be appropriate to enable the proposed actions to be delivered, noting the potential to target stronger safeguarding in areas the local planning authority considers to be of greater importance. This will enable local planning authorities to support the best opportunities to create or improve habitat to conserve and enhance biodiversity, including where this may enable development in other location.

2.30. Local Nature Recovery Strategies will identify areas where habitat creation, restoration or enhancement would be most beneficial for nature recovery and wider environmental outcomes. They can play a critical role in supporting offsite gains to be delivered in a way that maximises biodiversity benefits.

## Greater Manchester Context

### Greater Manchester Strategy (2025)

2.31. The [Greater Manchester Strategy](#)<sup>4</sup> sets the vision for a thriving city region where everyone can live a good life.

2.32. The strategy makes reference to declaring a Biodiversity Emergency and the plan to reverse biodiversity loss by implementing the Greater Manchester LNRS.

### Greater Manchester Five-Year Environment Plan

2.33. The Greater Manchester [Five-Year Environment Plan \(2024\)](#)<sup>5</sup> sets out a vision where Greater Manchester will be a nature-rich and carbon neutral city region where all citizens have access to affordable renewable energy, warm climate resilient homes, high quality blue and green spaces, healthy and locally produced food, and a reliable, integrated, inclusive, sustainable and affordable transport system, where avoidable waste is significantly reduced.

2.34. Greater Manchester's urban environments will be cleaner and greener containing more trees and green spaces and providing environments for nature to thrive... Rural environments will be managed for nature recovery and to protect wildlife.

2.35. The Strategy sets an aim where our natural environment is enhanced, providing benefits to people, economy and nature. This is supported by objectives to:

- Expand and enhance our best spaces for nature
- Better connect the best spaces for nature by creating and restoring habitats
- Reduce pressures on our water environment
- Increase the amount of green and blue spaces (parks, countryside, public realm etc) that are better managed for nature
- Increase the number of green and resilient transport routes, streets & highways
- Increase the amount of green and resilient new infrastructure, regeneration and development
- Increase the amount of community-led action and better connection to nature

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<sup>4</sup> The Greater Manchester Strategy (2025) is available at: <https://togetherwearegm.co.uk/our-vision/greater-manchester-strategy/>

<sup>5</sup> The Five Year Environment Plan is available at: <https://www.greatermanchester-ca.gov.uk/what-we-do/environment/five-year-environment-plan/>

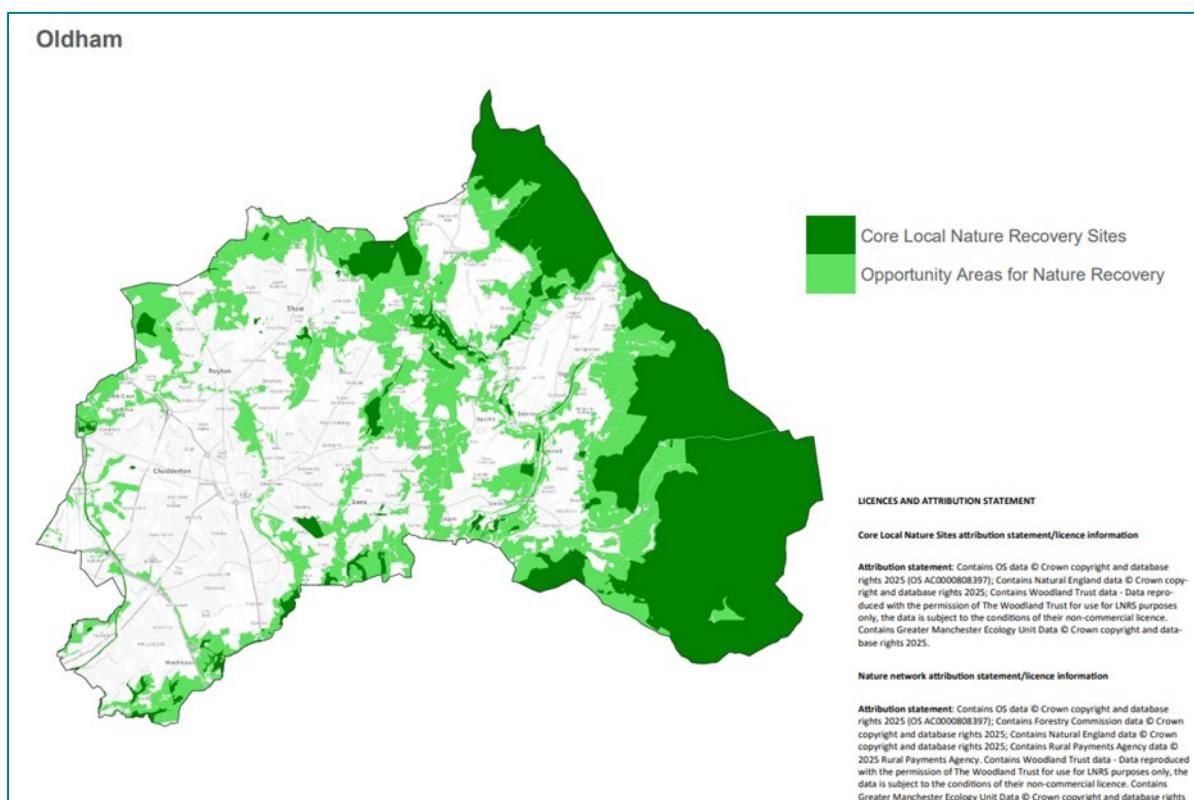
## Greater Manchester Local Nature Recovery Strategy

2.36. The [Greater Manchester Local Nature Recovery Strategy](#)<sup>6</sup> (LNRS) (September, 2025) sets out a shared vision for nature recovery in Greater Manchester; and priorities, targets and actions for different habitats and species. Actions that are not mapped are applicable for consideration across the borough wherever they are relevant. For example, urban actions are not mapped but are applicable in any urban location and all habitat themes can be checked for relevance with regards to unmapped actions that can inform site layout and design.

2.37. Maps of the Greater Manchester Nature Network have been developed comprising:

- Core Local Nature Sites - existing valuable areas for nature which include our nature designations and irreplaceable habitats; and
- Nature Recovery Opportunity Areas - opportunity areas where action should be focused across the city-region

**Map 1: Oldham LNRS Map**



2.38. The core areas of the nature network include national and local nature designations and irreplaceable habitats, and these are shown on the Policies Map. These are areas where nature is already recognised for its importance and this will therefore include parts of the hierarchy in Policy N1. Development will not be permitted that does not adequately address the principles of biodiversity as set out in national planning policy. If mitigation needs to be considered, this should address the

<sup>6</sup> The GM LNRS is available at <https://greatermanchester-ca.gov.uk/what-we-do/environment/natural-environment/our-plan-for-nature-recovery/>

priorities and actions within the LNRS but also any relevant conservation objectives or management plans that may be prepared

- 2.39. Across Oldham the LNRS sets out opportunities (and which species the opportunities will support) for:
  - Woodlands, Trees, Scrub and Hedgerow;
  - Grasslands, Farmland and Lowland Heath;
  - River, Canal and Waterbodies;
  - Lowland, Wetland and Mossland;
  - Upland Moorland; and
  - Urban green spaces and buildings.
- 2.40. The LNRS also identifies local species particularly at risk and practical actions for the target species or species groups.
- 2.41. The LNRS opportunity areas are strategically identified areas that are crucial to developing a coherent nature recovery network across Greater Manchester, through expanding or joining up our core local nature sites. These opportunity areas have no existing statutory protection and have significant potential to become of particular importance for biodiversity. They represent the best areas to connect-up spaces for nature across Greater Manchester and are where effort should be concentrated to achieve the most for biodiversity. Developments within opportunity areas should be ambitious for nature recovery.

### **Places for Everyone (PfE)**

- 2.42. The [Places for Everyone](#)<sup>7</sup> (PfE) Joint Development Plan Document (DPD), is a strategic plan that covers nine of the ten Greater Manchester districts - Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan. The Plan took effect and became part of the statutory development plan for each of the nine PfE authorities on 21 March 2024.
- 2.43. The relationship between PfE and the Oldham Local Plan: Publication Plan is explained in the Setting the Scene Topic Paper.
- 2.44. The following PfE policies are relevant to this Addressing the Biodiversity Emergency Topic Paper:
- 2.45. **JP-Strat13 Strategic Green Infrastructure** – this policy identifies the green infrastructure assets (river valleys and waterways; lowland wetlands and mosslands; uplands and Trees and Woodlands) that will be protected and enhanced which the below policies provide more detail on.
- 2.46. **Policy JP-G2 The Green Infrastructure Network** states that a strategic approach will be taken to the protection, management and enhancement of our Green Infrastructure in order to protect and enhance the ecosystem services which the Green Infrastructure Network provides.

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<sup>7</sup> Places for Everyone is available at: <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/strategic-planning/places-for-everyone/pfe-adoption/>

- 2.47. The protection, management and enhancement of Green Infrastructure will contribute to the development of a LNRS for Greater Manchester. This Strategy will feed into the development of a Nature Recovery Network locally and nationally
- 2.48. **Policy JP-G3 River Valleys and Waterways** – sets out how rivers and waterways will be protected and improved through a number of priorities.
- 2.49. **Policy JP-G4 Lowland Wetlands and Mosslands** - sets out how lowland wetlands and mosslands will be protected, enhanced and restored through a number of priorities.
- 2.50. **Policy JP-G5 Uplands** – outlines that our uplands include significant areas of blanket bog priority habitat, Sites of Biological Importance (SBIs), Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs), woodlands and habitats. The policy sets out what will be considered in making planning decisions and activities.
- 2.51. **Policy JP-G6 Urban Green Space** – seeks to ensure there is an appropriate scale, type, quality and distribution of accessible urban green space.
- 2.52. **Policy JP-G7 Trees and Woodland** – seeks to significantly increase tree cover, protect and enhance woodland and connect people to the trees and woodland around them. The Policy states where development would result in the loss of existing trees, requiring replacement on the basis of two new trees for each tree lost, or other measures that would also result in a net enhancement in the character and quality of the treescape and biodiversity value in the local area, with a preference for on-site provision;
- 2.53. **Policy JP-G8 A New Enhancement of Biodiversity and Geodiversity** – sets out how a net enhancement of biodiversity resources will be sought including through increasing the quantity, quality, extent and diversity of habitats; improving connections between habitats (including Nature Recovery Networks) and stepping stones; and developments achieving a net gain in biodiversity of no less than 10%.
- 2.54. **Policy JP-G9 The Green Belt** – identifies the Green Belt and seeks to enhance the green infrastructure functions within it.
- 2.55. Other PfE policies also relate to biodiversity such as site allocation policies and transport policies.

#### **South Pennine Moors Special Area of Conservation (SAC) / Special Protection Areas (SPAs) Supplementary Planning Document (SPD)**

- 2.56. The [South Pennine Moors Special Area of Conservation \(SAC\) / Special Protection Areas \(SPAs\) Supplementary Planning Document \(SPD\)](#) (May 2025) is applicable to three of the PfE Plan authorities - Oldham (not including the area covered by the Peak District National Park), Rochdale and Tameside, and has been prepared jointly by these three authorities.
- 2.57. The SPD provides further guidance on the implementation of PfE Policy JP-G5 Uplands, in particular parts a and b of clause 7. The policy seeks to ensure that new

development does not have an adverse impact on protected habitats of the South Pennine Moors SAC, the Peak District Moors SPA and the South Pennine Moors Phase 2 SPA from urban edge effects (within 400m of the SAC and SPAs boundaries) or loss of and/or disturbance to functionally linked habitats (within 2.5km of the SAC and SPAs boundaries).

- 2.58. The SPD was adopted by the three Councils and came into effect on 8 May 2025.

#### **Holcroft Moss Planning Obligations Supplementary Planning Document**

- 2.59. The [Holcroft Moss Planning Obligations SPD](#)<sup>8</sup> (May 2025) has been prepared by the nine PfE authorities.
- 2.60. The SPD supplements PfE Policy JP-C8 - Transport Requirements of New Development, in particular clause 17. This clause requires planning applications accompanied by a Transport Assessment to consider air quality impacts on Holcroft Moss, which is within the Manchester Mosses Special Area of Conservation (SAC), to ensure new development does not have an adverse impact on its protected habitats and species.
- 2.61. Although this SAC is within Warrington, cross boundary effects are assessed when preparing and implementing plans.
- 2.62. The SPD was adopted by the nine Councils and came into effect on 8 May 2025.

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<sup>8</sup> The Holcroft Moss Planning Obligations SPD is available at: <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/strategic-planning/places-for-everyone/joint-supplementary-planning-documents/holcroft-moss-planning-obligations-spd/adoption/>

## Local Context

- 2.63. A summary of the Oldham Partnership's Oldham Plan and the Council's Corporate Plan and how the Local Plan will help to deliver their missions and priorities is provided in the Setting the Scene Paper. The sections below focus on those parts of the plans relevant to Addressing the Biodiversity Emergency.

### The Oldham Plan

- 2.64. The [Oldham Plan 2024-2030 Pride, Progress and Partnership](#)<sup>9</sup> sets out three clear missions to achieve by 2030 to deliver real improvements to the lives of Oldham people. The mission most relevant to Addressing the Biodiversity Emergency is Green and Growing and seeks to lead the way on green projects across the country. A Great Place to Live also aims to improve public spaces.

### Oldham Council Corporate Plan

- 2.65. Oldham Council's [Corporate Plan 'Ready for the Future'](#)<sup>10</sup> (2024-2027) builds on the Oldham Plan and is focused on Healthier, Happier Lives, Great Place to Live and Green and Growing.
- 2.66. Relevant to Addressing the Biodiversity Emergency is a Great Place to Live, which has aims to create neighbourhoods where residents are proud to live, and work with the Council to keep them clean and green. A Great Place to Live also seeks to improve parks and green spaces and vibrant outdoor environments for everyone to enjoy.

### Building a Better Oldham

- 2.67. [Building a Better Oldham](#)<sup>11</sup> is the Council's ambitious transformation programme for the borough. As with the Partnership's missions, the Local Plan supports delivery of this ambitious programme. Further information can be found in the Setting the Scene Topic Paper.
- 2.68. In relation to Addressing the Biodiversity Emergency the programme aims to ensure Oldham is the greenest borough.

### Oldham Green Infrastructure Strategy and Open Space Study (2022)

- 2.69. The [Oldham Green Infrastructure Strategy](#)<sup>12</sup> (2022) sets out a vision that:  
*"By 2037, Oldham will be a carbon neutral exemplar with a resilient, multifunctional Green Infrastructure network which brings multiple benefits to the natural and built*

<sup>9</sup> The Oldham Plan is available at:

[https://www.oldham.gov.uk/info/201261/oldham\\_plan/3207/oldham\\_plan](https://www.oldham.gov.uk/info/201261/oldham_plan/3207/oldham_plan)

<sup>10</sup> The Corporate Plan is available at:

[https://www.oldham.gov.uk/downloads/file/8094/oldham\\_corporate\\_plan\\_ready\\_for\\_the\\_future](https://www.oldham.gov.uk/downloads/file/8094/oldham_corporate_plan_ready_for_the_future)

<sup>11</sup> Building a Better Oldham is available at:

[https://www.oldham.gov.uk/info/201248/building\\_a\\_better\\_oldham#:~:text=Building%20a%20Better%20Oldham%20is,jobs%20and%20100%20apprenticeship%20opportunities.](https://www.oldham.gov.uk/info/201248/building_a_better_oldham#:~:text=Building%20a%20Better%20Oldham%20is,jobs%20and%20100%20apprenticeship%20opportunities.)

<sup>12</sup> The Green Infrastructure Strategy is available at:

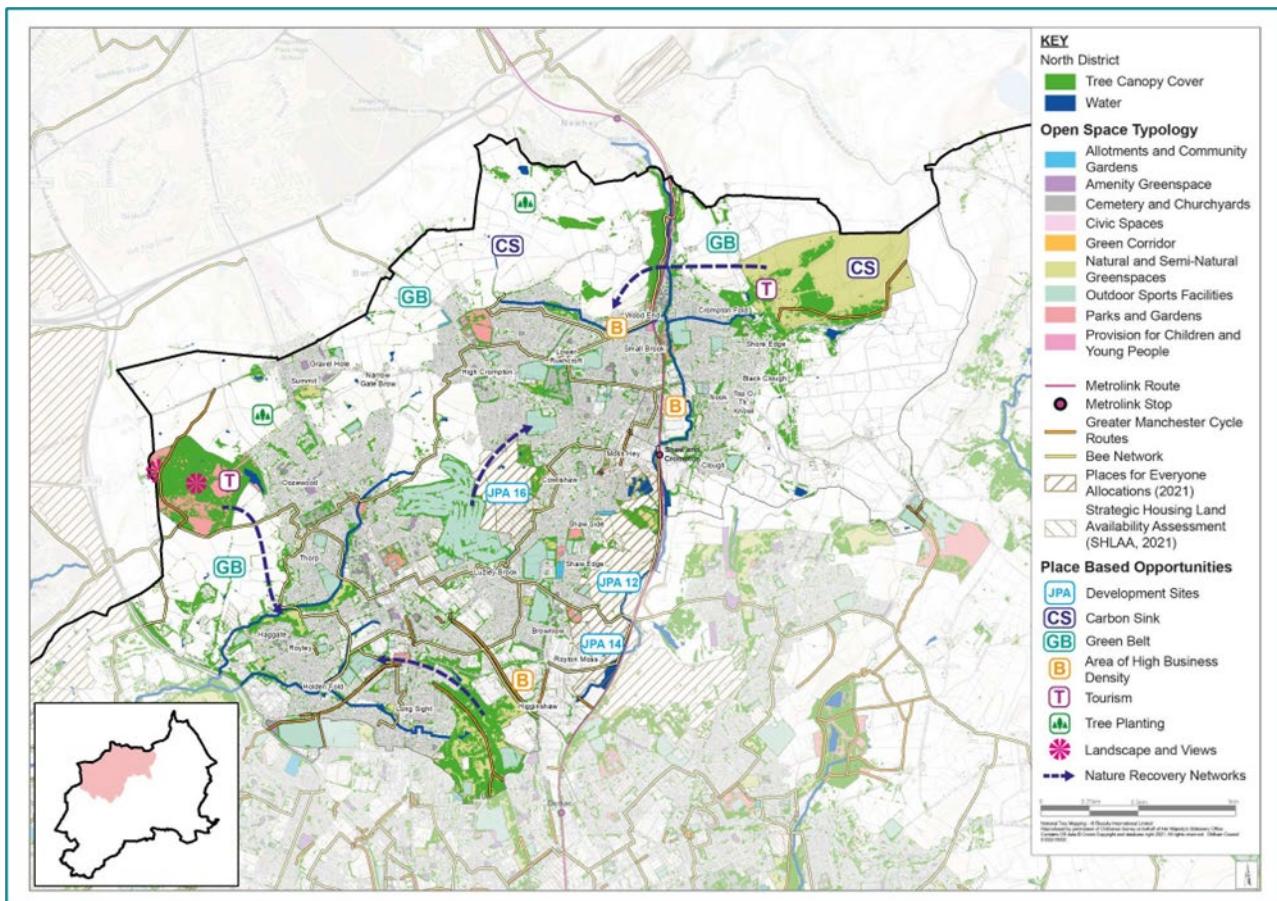
[https://www.oldham.gov.uk/downloads/download/2183/oldham\\_green\\_infrastructure\\_strategy](https://www.oldham.gov.uk/downloads/download/2183/oldham_green_infrastructure_strategy)

*environment and provides a solid foundation for the Council's response to climate change. Oldham will be a greener and healthier place to live, work and visit."*

2.70. The strategy sets out seven priorities which includes 'Thriving wildlife for Oldham' alongside six other related priorities including Green Access for All and Healthy and Active Communities.

2.71. The strategy sets out needs and opportunities for each priority, including thriving wildlife in each district across the borough. An example is provided below showing Green Infrastructure opportunities in the North District.

## Map 2: Green Infrastructure Opportunities in North District



2.72. As part of the Strategy, an Open Space Study (2022)<sup>13</sup> was carried out which assessed current provision of open space, sport and recreation within the borough and identified future needs related to each type of provision. Open Space is a key contributor to the borough's Green Infrastructure Network.

<sup>13</sup> Oldham Open Space Study (2022) available at: [https://www.oldham.gov.uk/downloads/download/2184/open space study documents 2022](https://www.oldham.gov.uk/downloads/download/2184/open%20space%20study%20documents%202022)

## Complying with the Biodiversity Duty – Our Policies and Objectives for Thriving Wildlife in Oldham

- 2.73. The Environment Act 2021 introduced a new biodiversity duty. This means all public authorities in England must think about how they can help to protect and improve nature.
- 2.74. For Oldham Council, this duty means we need to:
  - Look at what we can do to conserve and enhance local biodiversity.
  - Set policies and clear objectives based on those ideas.
  - Take action to put those policies into practice.
- 2.75. In March 2025, we agreed our policies and objectives - [Complying with the Biodiversity Duty – Our Policies and Objectives for Thriving Wildlife in Oldham](#)<sup>14</sup>
- 2.76. Our Policies and Objectives for Thriving Wildlife in Oldham report identifies seven objectives, listed below, which have been developed through considering the aims of the Greater Manchester LNRS which was draft at the time and the Oldham Green Infrastructure Strategy.
- 2.77. To support thriving wildlife in Oldham we will:
  1. Protect and restore core areas of wildlife;
  2. Promote nature recovery networks in areas of lower biodiversity;
  3. Optimise the Green Infrastructure functionality of existing open spaces to encourage wildlife;
  4. Promote multi-functional Green Infrastructure in allocated and potential development sites;
  5. Encourage habitat creation and enhancement in the Green Belt;
  6. Raise awareness and appreciation of biodiversity; and
  7. Consider biodiversity in corporate plans and decisions.
- 2.78. The objectives are then supported by a number of associated actions.

### Northern Roots

- 2.79. Northern Roots is a project in Oldham which is creating the UK's largest urban farm and eco-park on Snipe Clough, 160 acres of green space in the heart of Oldham. The aim is to develop Northern Roots to create a unique community hub and visitor destination. Northern Roots aims to create inspirational spaces and opportunities for people to connect around food, growing, nature, learning, creativity, sport, enterprise, work and play; and to do this in a way that supports nature, enhances wellbeing, creates jobs, and builds hope, pride and aspiration.
- 2.80. Transformation of the site has already begun with permission approved for a visitor centre with café, production kitchen, shop, performance, learning and meeting spaces. Permission has also been granted for a forestry skills centre to support

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<sup>14</sup> Complying with the Biodiversity Duty – Our Policies and Objectives for Thriving Wildlife in Oldham report is available at: <https://www.oldham.gov.uk/downloads/download/2266/biodiversity>

vocational learning. Longer term plans include bike hubs and trails, play facilities, further learning and wellbeing facilities, a market garden and swimming pond.

### 3. Issues, challenges and opportunities relating to Addressing the Biodiversity Emergency

- 3.1. This section summarises the main issues, challenges and opportunities relating to Addressing the Biodiversity Emergency that we face in Oldham, underpinned by proportionate and relevant evidence.

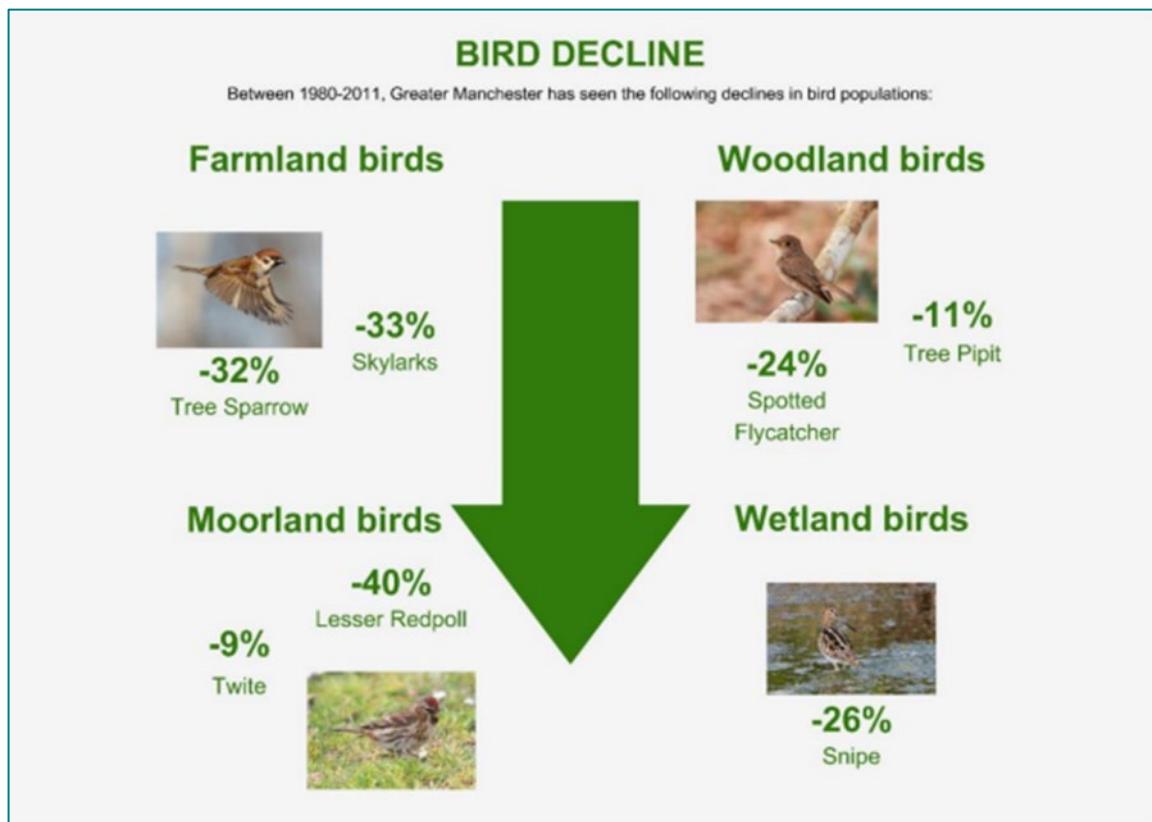
To reverse biodiversity loss and to deliver a resilient network for nature, connecting and enhancing wild spaces so that people and nature can thrive.

- 3.2. The [Greater Manchester State of Nature report](#)<sup>15</sup> (March 2024) was compiled to highlight the urgent challenges faced by nature across the city-region, which was reflected in the declaration of a biodiversity emergency in Greater Manchester in March 2022. The report covers trends in our wildlife, the use of land and pressures on nature, the wider benefits we receive from nature and people's access to nature and engagement with it.
- 3.3. Some of the headline findings from this report are:
  - Echoing national trends, key species of birds and mammals in GM and the North-West of England are declining. Individual bird species population show declines of up to 40% over the last 40 years and the abundance of once common mammals has dropped by between 20-40% since 1995.
  - Our protected sites provide valuable refuges for nature but cover just 11% of GM and are highly fragmented rather than forming a connected network for nature. Although recovering at present they are not in as good as condition as they could be.
  - 80% of our water bodies have been heavily modified by human activities. Currently none of our rivers are in good ecological condition and we are far from meeting national targets for 75% of our waterbodies to reach this status
  - Our tree canopy covers 16% of GM (in Oldham specifically, the tree canopy cover is 13.4% of the borough) and significant efforts are being made to increase the number of trees being planted across the city region. However, our existing woodlands could be much better managed for nature.
- 3.4. The report highlights trends for birds and mammals.
- 3.5. Bird populations are used to provide a good indication of the broad state of wildlife in the UK. Greater Manchester is home to many populations of birds. Mirroring national trends, we have seen some worrying declines in our bird populations.

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<sup>15</sup> The Greater Manchester State of Nature Report is available at: <https://www.greatermanchester-ca.gov.uk/media/9526/gm-state-of-nature-report.pdf>

**Figure 1: Bird decline (Greater Manchester State of Nature Report)**



3.6. The population trends for mammals are relatively poorly known in Greater Manchester, and we are reliant on data for the whole of the North-West. 25-year trends for the North-West show us that we are losing once common species.

**Figure 2: Mammal decline (Greater Manchester State of Nature Report)**



3.7. However, there are signs that nature can recover, and there is evidence that the following species have been returning, which can give hope for future efforts:

- Otters – sights in districts across Greater Manchester;
- Fish and Mayflies have returned to all sections of the River Medlock;
- Butterflies – Manchester Argus Butterfly (Large Heath Butterfly) has been reintroduced at Astley Moss;
- Birds – Nightjars returning around Chat Moss; and

- Bog plants – Sundew, Lesser Bladderwort, Bog Asphodel and White Beak Sedge all now thrive on lowland peatlands.

3.8. Some of the pressures of biodiversity noted within the State of Nature report are:

- Pressures on land use - Land in Greater Manchester is limited and is under increasing demand to meet a variety of needs. These needs include providing homes, commercial space, transport and utilities for the city-region; supporting energy generation, carbon sequestration (e.g. tree planting and peatland restoration) and climate adaptation (e.g. nature-based solutions); and food growing and recreation.
- Pressures on water and waterbodies - Water in Greater Manchester is under pressure from a range of sources. Over 20% of the water in most Greater Manchester rivers has been discharged from a Wastewater Treatment Works. For some rivers this is as high as 60 to 80%.
- Pathogens and diseases - As well as invasive plant species, microorganisms that cause disease pose a threat to wildlife and ecosystems. The most significant of these currently affecting Greater Manchester and the rest of the UK is ash dieback. Other diseases, like avian influenza, may pose threats to wildlife (in that instance, to birds). Climate change is likely to increase risk of the introduction and spread of pathogens.
- Climate change - Climate change has already impacted biodiversity in Greater Manchester as species shift northwards. As temperatures increase, climate zones will move northwards at 5km per year by 2050 – equivalent to moving from the south to north of Greater Manchester in 8 years, a process which took 800 years at the end of the last ice age. Risk assessments for species in England show that more species are expected to increase their ranges rather than decrease. However, upland habitat species in the north and east of the city-region are particularly vulnerable to climate change due to northwards and upwards range contraction. Given the importance of uplands to water management and carbon storage, this may have knock on impacts. These effects will be exacerbated further by the projected increase in hazardous fire weather conditions in summer, meaning greater risk of wildfires in the uplands and extension of the wildfire season into late summer and early autumn.

3.9. In 2010 the Lawton Review '[Making Space for Nature](#)'<sup>16</sup> (September 2010) was published. The Lawton Review concluded that England's wildlife sites, despite their diversity, did not comprise a coherent and resilient ecological network, let alone one capable of coping with the challenge of climate change and other pressures. To address this, the Lawton Review called for the creation of a healthy ecological network operating across the landscape, not in isolated sites.

3.10. To do this, Lawton says, we need to make our network of sites bigger, better and more joined up. This means:

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<sup>16</sup> The Lawton review 'Making Space for Nature' is available in archives at <https://webarchive.nationalarchives.gov.uk/ukgwa/20130402170324/http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf>

- Protecting and enhancing what we have, with better management;
- Increasing the size of wildlife sites;
- Enhancing connection by creating new wildlife corridors or stepping stones;
- Creating new sites; and
- Reducing pressure on wildlife by improving the wider environment.

3.11. The recommendations of the Lawton Review are now being taken forward across the UK, and elsewhere in the world. It is integral to the Environment Act 2021 and has shaped current national policy and government ambitions for a national nature recovery network.

3.12. The Environment Act 2021 introduced a strengthened ‘biodiversity duty’ which requires all public authorities in England to consider what they can do to conserve and enhance biodiversity.

3.13. This included the requirement for Local Nature Recovery Strategies (LNRS) to cover the whole of England setting out where and how efforts should be focused locally to contribute to halting and reversing the decline in biodiversity. There are 48 strategy areas across England, including one for Greater Manchester

3.14. The strategy sets out a Nature Network for Greater Manchester. This has its basis in the national policy and evidence on nature recovery and the principles of “more, bigger, better and joined up” spaces for nature. This uses existing core local nature sites as its basis by:

1. Improving the quality of those sites by better habitat management.
2. Increasing their size.
3. Enhancing the connections between them, through corridors or stepping stones.
4. Creating new sites.
5. Reduce pressures by improving the wider environment, including buffering those sites.

3.15. The LNRS<sup>17</sup> identifies core areas (Areas that are of Particular Importance for Biodiversity); opportunity areas (Areas that Could Become of particular importance (for biodiversity)) and mapped measures.

3.16. Planning Practice Guidance states local planning authorities should consider the priorities set out in the relevant LNRS when determining how their local plan should contribute to and enhance the local and natural environment.

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<sup>17</sup> The data links for these maps is available at: <https://www.data.gov.uk/dataset/10e87b90-3a79-4b2f-8cdf-7777ce24009e/greater-manchester-local-nature-recovery-strategy>.

## To deliver a multi-functional Green Infrastructure network

- 3.17. Green Infrastructure is an umbrella term used to describe a range of assets such as open spaces, playing fields, woodland (including ancient woodland), residential gardens, sustainable drainage features, trees, green roofs and walls and 'blue infrastructure', such as river corridors, ponds and canals, which all offer habitats for biodiversity.
- 3.18. Over 75% of Oldham consists of Green Infrastructure. This includes agriculture (25%), semi-natural habitat (18%), private gardens (12%), deciduous woodland (6%) and amenity space (6%). Although Green Infrastructure is extensive, we need to manage it more effectively to better respond to the needs of people and nature, and ensure it is resilient to the changing climate.
- 3.19. The Green Infrastructure Strategy sets out seven priorities themes:
  1. thriving wildlife for Oldham;
  2. carbon neutral Oldham;
  3. healthy and active communities;
  4. green access for all;
  5. distinctive landscapes;
  6. slowing the flow and a quality water environment; and
  7. sustainable growth and green jobs.
- 3.20. The Green Infrastructure Strategy provides an up-to-date assessment of current Green Infrastructure provision and opportunities using existing data sets. The spatial data sets produced within the Green Infrastructure Strategy; highlight opportunity areas aligned to local need and can be used to guide development decisions.
- 3.21. The Green Infrastructure Strategy sets out a step-by-step guide as to how to implement the strategy when considering a development proposal.
- 3.22. Urban Greening Factor<sup>18</sup> is also a tool developed by Natural England to improve provision of Green Infrastructure, particularly in urban areas.

## To increase tree canopy cover

- 3.23. The UK's Tree Planting Taskforce<sup>19</sup> was launched on 28 November 2024 to oversee the planting of millions of trees, aiming to meet net zero targets and enhance woodland resilience. Its key objectives include improving cross-nation collaboration, sharing best practices, and addressing barriers to tree planting.

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<sup>18</sup> Urban Greening Factor for England is available at:

<https://publications.naturalengland.org.uk/publication/5846537451339776>

<sup>19</sup> The Press Release regarding the UK Tree Planting Taskforce is available at

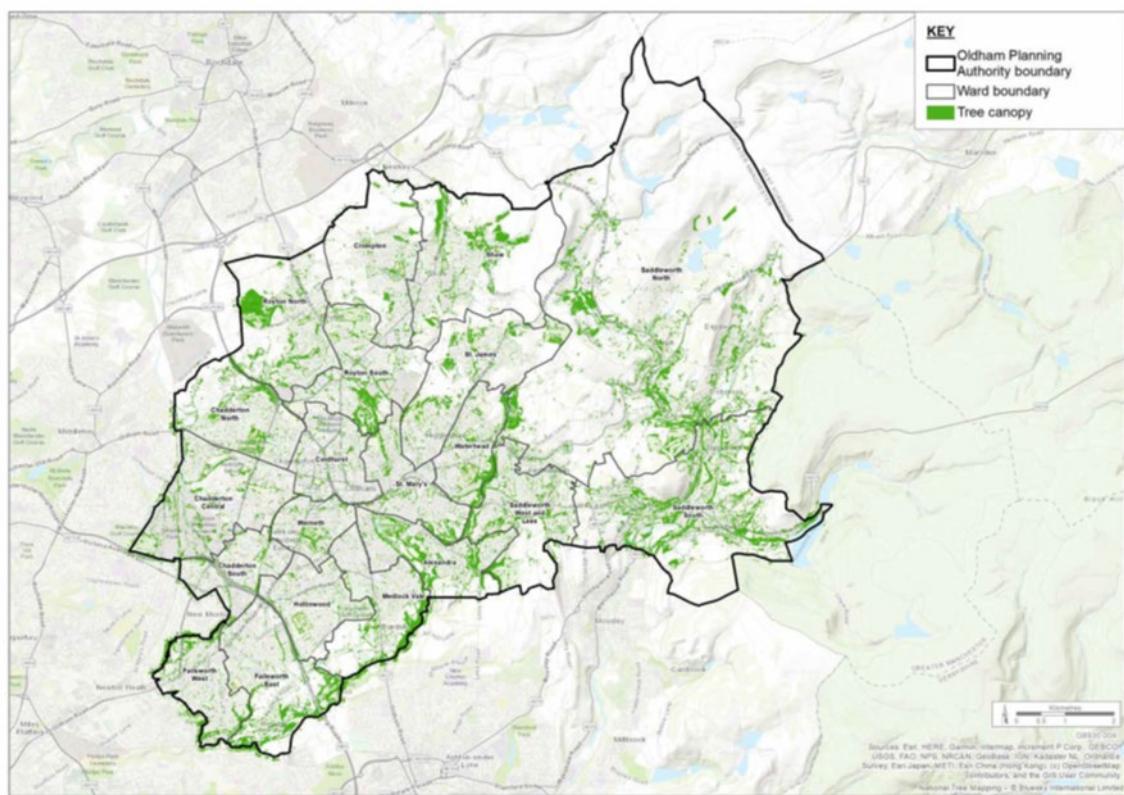
<https://www.gov.uk/government/news/government-launches-treeplantingtaskforce-to-oversee-planting-of-millions-of-trees-across-our-four-nations>

- 3.24. The Greater Manchester Five-year Environment Plan, PfE and the Greater Manchester LNRS all aim to plant more trees.
- 3.25. The LNRS sets a target to expand tree canopy cover from 15% to 17% of the city region by 2035.
- 3.26. The Oldham Green Infrastructure Strategy forms part of the evidence for the Oldham Local Plan.
- 3.27. The Green Infrastructure Strategy identified seven priority themes. Extending the canopy cover links to these themes including 'Thriving wildlife' noting that our scattered core biodiversity areas can be joined up by increasing tree canopy and 'Distinctive Landscapes' as street trees can bring a sense of place to urban areas.
- 3.28. The Green Infrastructure Strategy used the National Tree Mapping dataset to present canopy cover across the borough. The dataset confirms that the average canopy cover across the borough is 13.4%, with the percentage canopy cover per ward indicated in Table 1 below.

**Table 1: Tree canopy cover in Oldham wards**

| <b>Ward</b>               | <b>Canopy Cover</b> |
|---------------------------|---------------------|
| Central District          | 17.0%               |
| Alexandra                 | 23.2%               |
| Coldhurst                 | 10.0%               |
| St Mary's                 | 16.4%               |
| East District             | 11.8%               |
| Saddleworth North         | 7.8%                |
| Saddleworth South         | 19.4%               |
| Saddleworth West and Lees | 19.0%               |
| St James                  | 12.9%               |
| Waterhead                 | 20.5%               |
| North District            | 13.6%               |
| Crompton                  | 8.0%                |
| Royton North              | 17.4%               |
| Royton South              | 17.9%               |
| Shaw                      | 11.8%               |
| South District            | 16.4%               |
| Failsworth East           | 18.8%               |
| Failsworth West           | 18.7%               |
| Hollinwood                | 10.3%               |
| Medlock Vale              | 16.6%               |
| West District             | 14.2%               |
| Chadderton Central        | 13.2%               |
| Chadderton North          | 16.0%               |
| Chadderton South          | 12.4%               |
| Werneth                   | 15.3%               |

**Map 3: Tree canopy cover across wards within Oldham's planning boundary**



- 3.29. The Canopy Cover of England's Towns and Cities advises that the mean tree canopy cover of England's towns and cities is 16.4%.
- 3.30. Evidence from the report shows that trees are a cost-effective remedy in moderating heat stress, reducing elevated levels of air pollution, managing rainfall and contributing to human wellbeing.
- 3.31. In accordance with the Canopy Cover of England's Towns and Cities, the tree canopy should aim for 20% cover, taking account of the retention of existing trees and the future canopy growth of trees to be planted as part of the landscape for the site. The exception to this is in parts of the Shaw and Saddleworth wards, where the existing peatland habitat takes precedence.
- 3.32. Size class distribution is an important factor in managing a sustainable tree population, as this will ensure that there are enough young trees to replace those older specimens that are eventually lost through old age or disease. The majority of trees in Oldham are in the lowest size categories, 72% of the trees recorded have a diameter at breast height (dbh) of less than 30cm, whilst around 40% of the trees have diameters less than 15cm. Across Oldham approximately 28% of the tree population is larger than 30cm dbh. This compares favourably with cities and towns in other regions of England, where the Trees in Towns 2 survey found that on average only 10–20% of trees have a dbh that is greater than 30cm. Large mature trees offer unique ecological roles not offered by smaller or younger trees. Furthermore, older trees with larger crowns provide greater benefits than a similar number of smaller sized trees.

- 3.33. To maintain or increase a level of mature trees, young trees are needed to restock the larger size classes (with surplus) to include planning for mortality.
- 3.34. Green Infrastructure Strategy recommends a policy approach which includes retaining existing trees and hedgerows wherever possible and a target of 20% for tree canopy cover, taking account of the retention of existing trees and the future canopy growth of trees.

## **4. Addressing the Biodiversity Emergency and the Oldham Local Plan: Publication Plan**

- 4.1. This section of the Topic Paper looks at each of the policies contained in the Addressing the Biodiversity Emergency chapter of the Oldham Local Plan: Publication Plan.
- 4.2. For each policy the Topic Paper shows how policies within the Oldham Local Plan: Publication Plan have been shaped to provide an appropriate strategy for the borough that is based on proportionate evidence and having regard to:
  - The key issues, challenges and opportunities facing the borough in relation to Addressing the Biodiversity Emergency;
  - Responses received as part of the Oldham Local Plan: Draft Plan consultation and Duty to Co-operate discussions; and
  - The outcomes of the Integrated Assessment, including any requirements of the Habitat Regulations Assessment.

### **Policy N1: Protecting Nature**

#### **Summary of Evidence**

- 4.3. NPPF states planning policies should contribute to and enhance the natural and local environment by protecting and enhancing sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).
- 4.4. It goes on to say that plans should: distinguish between the hierarchy of international, national and locally designated sites and Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.

#### **Nature designations and areas of biodiversity value**

- 4.5. The list below are the nature designations and areas of biodiversity value within Oldham.
- 4.6. Internationally Designated Statutory Nature Conservation Sites:
  - South Pennine Moors Special Protection Areas (SPAs);
  - South Pennine Moors Special Area of Conservation (SACs); and
  - Rochdale Canal Special Area of Conservation (SACs).
- 4.7. Nationally Designated Statutory Nature Conservation Sites:
  - Site of Special Scientific Interest (SSSIs) - Rochdale Canal; South Pennine Moors; Standedge Tunnel; Ladcastle and Den Quarries; Lowside Brickworks; and Dark Peak.
- 4.8. Locally Designated Non-Statutory Sites:

- Sites of Biological Importance (SBIs) – see Appendix 10 of Publication Plan for list and grade.
- Local Nature Reserves (LNRS) – Glodwick Lows

4.9. Regionally Important Geodiversity Sites (RIGS) at Glodwick Brickpit and Rocher Vale.

4.10. SBIs and RIGS are adopted by the Council after being recommended by Greater Manchester Ecology Unit (GMEU) who are the Greater Manchester Local Record Centre; and The Greater Manchester RIGS Group.

4.11. There are also areas of:

- Irreplaceable habitat including ancient woodland, ancient and veteran trees and blanket bog; and
- Sites that are not designated for nature but contain substantive nature conservation value of local significance including priority habitats and species and other protected species, such as peat which is capable of restoration to support notable habitats, green corridors and recreational routes.

### **Green Corridors and Links**

4.12. The Council has undertaken a review of Green Corridors and Links, which is a designation for wildlife corridors. This is available as a separate document.

4.13. The Unitary Development Plan (UDP) (2006), a previous Local Plan, paragraph 11.73 states:

4.14. *Green Corridor and Links are a special feature of the Borough, thanks mainly to its river valleys, canals and features such as Oldham Edge, and are valuable both for wildlife and recreation. By linking together habitats they help to support a richer diversity of species than would exist in isolated natural areas and, because of their proximity to major residential areas, they allow local people a break from the pressures of urban living.*

4.15. Paragraph 11.814 of the UDP adds that some are identified solely because they assist the movements of wildlife, for example the existing railway lines, while others assist the movement of both people and wildlife.

4.16. Therefore, Green Corridor and Links served a wildlife role primarily and, in some cases, also a recreational role.

4.17. The Joint Core Strategy and Development Management Policies DPD (the existing Local Plan in addition to PfE) carried these designations forward from the UDP.

4.18. The Local Plan Review has sought to assess whether the Green Corridor and Links are still justified.

4.19. The review has used the final Greater Manchester LNRS to determine whether the Green Corridor and Links are still considered to be important for connecting areas of biodiversity.

- 4.20. The Council has not determined that the full Greater Manchester LNRS area is a 'Green Corridor and Link' as this would make the whole of the nature network a development constraint which it was not intended to be. Instead, the review considers whether the existing Green Corridor and Link designations are still justified, informed by whether they fall within the nature network.
- 4.21. Consideration has also been given to evidence set out in Oldham's Green Infrastructure Strategy (2022).
- 4.22. The Council has also prepared a [Local Green Space Assessment](#)<sup>20</sup> (July 2021) which in some places overlaps with Green Corridor and Links. The Green Corridor and Links review has noted where land is being proposed as a Local Green Space due to its wildlife significance informed by the Local Green Space Assessment.
- 4.23. Boundary amendments have been proposed to reflect the LNRS nature network better either by removing land where there does not appear to be evidence that land would help join up the nature network or by adding land in to reflect areas of the nature network adjoining the existing Green Corridor and Link.
- 4.24. In some cases, the Green Corridor and Link designation has been amended to reflect changes in land use such as development, including a new linear park, that has taken place at Foxdenton.
- 4.25. The assessment provides a summary of the proposed changes which are covered in more detail within the assessment. This summary can be seen in Appendix 1.
- 4.26. Although this exercise will involve the de-designation of some wildlife corridors having up to date evidence means the Council can justify the safeguarding of Green Corridors and Links where they have an important role to play in nature recovery.
- 4.27. Equally green corridors and links that have been de-designated may still be protected by other planning policies. For example, the corridors may consist of open space and so may be protected by Policy CO1 'The Protection of Open Space, Sport and Recreation Provision.'
- 4.28. Maps of Green Corridors and Links being de-designated and with boundary changes can be seen in Appendix 11 of the Publication Plan. The Green Corridors and Links are also shown on the Policies Map.

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<sup>20</sup> The Local Green Space Assessment is available at [https://www.oldham.gov.uk/downloads/file/7043/local\\_green\\_space\\_assessment](https://www.oldham.gov.uk/downloads/file/7043/local_green_space_assessment)

## Draft Local Plan consultation and Duty to Co-operate

4.29. At Draft Plan stage the following comments were received, which the Council has addressed, as set out in table 2 below.

**Table 2: Summary of comments and amendments to Policy N1 Protecting Nature**

| Respondent                         | Summary of Comment   | Council Response  |
|------------------------------------|--|---|
| Historic England, Kirklees Council | Support Policy.  | Support noted.  |
| Canals and River Trust             | Support Policy. Highlight that cumulative effects of several smaller developments on SAC and SSSI habitats need to also be included in an Ecological Assessment. If possible, it would be useful if prospective developers could be signposted to this need.   | Support noted. The HRA considers cumulative impacts of housing and employment requirements. SSSI are considered in line with Natural England advice.  |
| Environment Agency                 | Welcome a review of the current green corridors and recommend as part of the review process that ecological quality of current water bodies and key ecological networks flowing through the borough be encompassed. With regards to mitigation for rivers and streams there will likely be significant environmental opportunities of not only adopting or extending green space buffers, but potentially also adopting equally valuable restoration techniques when designing new site surface water drainage schemes. Would recommend such opportunities are assessed early in the design process. | Support for green corridor review noted. This has focussed on whether the existing corridors can still be justified, which has taken into account the LNRS which includes looking at opportunities for river, canals and waterbodies and other opportunities as identified in the nature network.<br><br>Text has been added to the Reasoned Justification to reflect opportunities for mitigation for rivers and streams in paragraph 14.26. |
| Natural England                    | Support the policy links between OL4 Local Green Space, IN2 Planning Obligations and N3 Enhancing Green Infrastructure through development.<br><br>May also wish to consider making further links to LE3, CC4 and CC2.   | The decision was taken in the Publication Plan to remove policy linkages.<br><br>The nature designations are shown on the Policies Map in addition to the   |

| Respondent                | Summary of Comment   | Council Response   |
|---------------------------|--|--|
|                           | <p>Welcome reference to PfE Policy JP-G9. Support the links made to PfE Policy JP-G5 and the South Pennine Moors SAC/SPA Supplementary Planning Document.</p>  | <p>core nature network (LNRS).<br/>Support for references to PfE policies noted. More text has also been added to the Reasoned Justification regarding PfE Policy JP-G5 and the South Pennine Moors SAC/SPAs SPD and PfE Policy JP-C8 and the Holcroft Moss Planning Obligations SPD in paragraphs 14.9 to 14.11.</p>  |
| Lancashire Wildlife Trust | <p>Welcome reference to a biodiversity emergency.</p> <p>Request lapwings are added to the list of species.</p> <p>The amended GM LNRS will also be considering species where their management requirements are beyond that of a singular habitat or where habitat management alone will not stop and reverse their decline.</p> <p>Recommend stating that there will be a presumption against developments that might adversely affect the hierarchy of sites.</p> <p>Advice including reference to the protection of ecological corridors and to make sure that development does not adversely affect their function.</p> <p>Regarding point 3, peat deposits underlying agricultural grasslands that are capable of restoration to peat bog should come under the definition of degraded bog. Given the timescale for the development of peat soils, Point 5 should include a reference to priority species and not just priority habitats.</p> | <p>Lapwings added to list of bird species that have declined in paragraph 14.3.</p> <p>More text has been added on the LNRS including on target species and actions to help them in paragraph 14.30.</p> <p>The policy wording has been amended to state "The borough's hierarchy for designated sites and wider ecological networks is identified below and will be safeguarded in line with national policy". The wording has not been amended as recommended due to the need to write positive planning policies.</p> <p>Green Corridors and Links are included within the hierarchy.</p> <p>Reference to peat which is capable of restoration to support notable</p> |

| Respondent                                | Summary of Comment  | Council Response   |
|---|---|--|
|   | <p>Welcome and support the intent to review green corridors in light of the emerging GM LNRS but would again draw attention to specific species strategies and management plans that might be recommended by the GM LNRS.</p>   | <p>habitats added to criterion 5.</p> <p>Reference to priority species added to criterion 5.</p> <p>Support for Green Corridor and Links review noted. Species Strategies and Management Plans will be covered by the wider biodiversity duty.</p>   |
| Pegasus on behalf of Mr & Mrs P.D. Martin | <p>Would like the following to be noted with regards the Sumner Street site - this site is within the boundary of the Shaw Side SBI as extended in 2019 however the appropriateness of the extended boundary is questionable. Reasons as to why have been provided.</p> | <p>The extended SBI has been approved by Oldham Council. The Council have made GMEU aware of the representation for future reviews. The landowner may also request that GMEU re-assess the SBI based on the ecology information gathered and present information as part of any future planning application. Until such time, policies on nature and the Strategic Allocation will be applied.</p> |

- 4.30. A detailed summary of the responses received can be found in the Schedule of Comments and the Council's Response document.
- 4.31. Duty to cooperate meetings were held with Natural England and the Environment Agency on 11 July 2025. The amendments were noted and Natural England stated these were positive.

#### Policy Approach

- 4.32. Policy N1 has been developed in response to NPPF encouraging plans to set out the hierarchy of international, national and locally designated sites and identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks.
- 4.33. Policy N1 identifies and safeguards the borough's nature designations and ecological network which is set out in a hierarchy.

- 4.34. The policy requires that ecological assessments will be required where a site contains, adjoins or may impact on a site which contains nature as described in the hierarchy.
- 4.35. The Reasoned Justification of the policy explains that designations are shown on the Policies Map.
- 4.36. The justification also gives an overview of PfE Policy JP-G5 and the South Pennine Moors SAC/SPA SPD to explain how the South Pennines SAC/SPA's integrity will be protected.
- 4.37. It also provides an overview of PfE Policy JP-C8 and the Holcroft Moss Planning Obligations SPD in relation to Transport Assessments.
- 4.38. Reference to Natural England's SSSI Impact Risk Zones is made and the justification explains what irreplaceable habitat and green corridors and links are.
- 4.39. The Reasoned Justification also explains that some brownfield sites can be of high environmental value and references to open mosaic habitats.
- 4.40. More detail on peat including reference to Natural England's Peat Map is also included.
- 4.41. The Reasoned Justification provides detail on mitigation and compensation.
- 4.42. Between Draft Plan stage and Publication Plan stage the policy has been amended by:
  - Amending the opening paragraph to set a positive tone and keep consistent with national planning policy; and
  - Re-ordering and presentational changes to criterions and other policy text.

#### Monitoring

- 4.43. Policy N1 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.
- 4.44. The Local Plan indicator that will be used to monitor this policy is:
  - Change in areas of biodiversity designations (i.e. SBI updates).
- 4.45. Policy M1 of the Local Plan sets out that where monitoring identifies underperformance or unintended outcomes:
  - Further guidance on the relevant policy matter may be produced through the preparation of supplementary plans.
  - Policy revisions and an early review of the Local Plan may be triggered.
  - Engagement with stakeholders may be undertaken to address delivery barriers.
- 4.46. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy N1.

### Integrated Assessment

- 4.47. The Integrated Assessment of Policy N1 resulted in 12 positive / significantly positive scores and 14 neutral scores.
- 4.48. For previous stages of the IA please see the IA report.
- 4.49. The HRA has screened the policy out. No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.

## Policy N2: Restoring Nature

### Summary of Evidence

- 4.50. The Greater Manchester Local Nature Recovery Strategy (LNRS) sets out a shared vision for nature recovery in Greater Manchester, and priorities, targets and actions for different habitats and species.
- 4.51. Maps of the Greater Manchester Nature Network have been developed comprising:
  - Core local nature sites - existing valuable areas for nature which include our nature designations and irreplaceable habitats; and
  - Nature Recovery Opportunity Areas - opportunity areas where action should be focused across the city-region
- 4.52. National Planning Guidance makes clear that when planning for biodiversity, local planning authorities must have regard to Local Nature Recovery Strategies, because they will establish local priorities for biodiversity and other environmental benefits and identify locations where biodiversity enhancement would be particularly beneficial.
- 4.53. The Greater Manchester Combined Authority (GMCA) shared a recommended policy template outlining how Local Plans can have regard to the Greater Manchester LNRS. This has been utilised to draft Policy N2.
- 4.54. Biodiversity Net Gain (BNG) became mandatory on 12 February 2024 for major developments and 2 April 2024 for minor developments. Most developments are expected to achieve a measurable net gain in biodiversity of no less than 10%. Where possible, this net gain should be provided within a development site, but there will be situations where this is not possible, and so a developer will need to look at options off site which may involve purchasing BNG credits for off-site delivery of appropriate habitat improvements.
- 4.55. The GM LNRS is to be used to determine 'strategic significance' for habitat parcels within the statutory Biodiversity Metric as explained in the [Guidance Note<sup>21</sup>](#) prepared by GMCA.
- 4.56. Oldham Council is exploring options for habitat banks to help facilitate off-site BNG.

### Draft Local Plan consultation and Duty to Co-operate

- 4.57. Table 3 below sets out comments received at Draft Plan stage and how the Council has addressed them. It should be noted that the policy was focussed on BNG at Draft Plan stage.

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<sup>21</sup> The Guidance Note: Biodiversity Net Gain Strategic Significance and the Greater Manchester Local Nature Recovery Strategy is available at: <https://www.greatermanchester-ca.gov.uk/media/kohgjuc/guidance-note-greater-manchester-approach-to-biodiversity-net-gain-strategic-significance-and-the-gm-local-nature-recovery-strategy.pdf>

**Table 3: Summary of comments and amendments to Policy N2 Restoring Nature**

| Respondent               | Summary of Comment  | Council Response   |
|--------------------------|---|--|
| Canals and River Trust   | No issue with the policy text. The Trust can consider proposals from developers to deliver net gains on its land but would undertake this on a case-by-case basis. In doing so, would have regard to Defra's guidance. The Trust's agreement to habitat enhancement activities being undertaken on our land would be subject to operational, management and commercial considerations.  | Comment noted.   |
| Environment Agency       | Welcome Policy N2, but it would be beneficial to highlight that the biodiversity metric assessment is split up into habitats, hedgerows and rivers. These units cannot be combined and are three distinct outcomes in relation to their net gains or losses.<br><br>A small sites metric is to be adopted in April 2024 and will be the main assessment procedure for these smaller development areas.<br><br>In regard to restoring nature it is recommended there is greater reference to current issues with invasive non-native species and how the planning system has a role to play in removing such species from the environment. | Noted. With regards to BNG much of the policy text has been removed in relation to this given that BNG is now statutory.<br><br>Text has been added into the Reasoned Justification to Policy N2 regarding invasive species. |
| Natural England          | Welcome reference to the LNRS. Suggest reference is made to wider ecological networks. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.   | The revised policy includes more text on the LNRS including the nature recovery network.   |
| Home Builders Federation | This policy may need to be kept under review as information becomes available on the emerging guidance and legislation.   | Noted. Much of the policy has been removed considering statutory instruments on BNG and available guidance. The  |

| Respondent                            | Summary of Comment  | Council Response  |
|---------------------------------------|---|---|
|                                       | <p>The PPG states that plan-makers do not need to include policies which duplicate the detailed provision of this statutory framework.</p> <p>It states that it would be inappropriate to include policies which are incompatible with this framework.</p>  | <p>policy focusses mostly on the LNRS now.</p>  |
| Lancashire Wildlife Trust             | <p>Support this policy. The requirement for species enhancements and management also needs to be taken into consideration when determining adverse impacts on nature conservation interests.</p> <p>Agree that irreplaceable habitats cannot be compensated for through BNG.</p> <p>It needs to be stated that the loss of irreplaceable habitat should only be permitted under exceptional circumstances and where bespoke compensation has been agreed.</p> <p>Welcome that the Council is proactively working to ensure that there are options for off-site net gain to be delivered within Oldham close to where developments may be taking place, and that can contribute towards the implementation of the Local Nature Recovery Network and enhancement of the Green Belt.</p> | <p>Reasoned Justification amended to make clear that loss of irreplaceable habitat should only be permitted in exceptional circumstances where bespoke compensation has been agreed (paragraph 14.38).</p> <p>Reasoned Justification to Policy N1 also amended to add that any species enhancements and management should be considered when determining adverse impacts (paragraph 14.24).</p> |
| Peak District National Park Authority | <p>Footnote 81 is missing and in the accompanying justification, options for off-site provision could be made within the National Park. Government has removed the requirement to submit a Gain Plan at the validation stage, and the requirement will come through a pre-commencement condition. Looking at a local requirement for this information upfront. This could include whether an area proposed for off-site gain is</p>   | <p>Noted however text and footnote has been removed in light of amended policy.</p> <p>Noted the BNG metric allows for spatial risk to be reflected.</p> <p>Much of the text has been removed in relation to BNG. However, reference has been added to the</p>  |

| Respondent                      | Summary of Comment  | Council Response  |
|---------------------------------|---|---|
|                                 | suitable with regards to other considerations e.g. heritage/ landscape.   | Greater Manchester Habitat Bank Verification and Auditing Guidance which sets out how sites should be audited before an agreement is signed.<br><br>This includes historic / archaeological / landscape constraints.                            |
| Sport England                   | Include an additional avoidance clause regarding biodiversity enhancements on playing field land meeting the requirements of Sport England's Playing Field Policy and Guidance and NPPF. Suggested wording provided.  | Policy CO1 addresses loss of open space. The plan must be read as a whole. In addition, a Habitat Bank would as part of verification check there are no conflicting land uses.  |
| Turleys on behalf of Northstone | Support the policy which reflects the mandated BNG statutory framework. To ensure that the policy accords with the aforementioned statutory framework, paragraph two in the policy wording should be updated to include reference to being able to obtain 'statutory biodiversity credits' at the end of the second sentence. | The policy has been revised therefore the text in relation to this point has been deleted.<br><br>The statutory system allows for credits to be purchased, and this is reflected in the BNG guidance referred to in the Reasoned Justification. |
| CRE8 land & Planning            | Support the policy. Have demonstrated that the outline proposals for the land off Maltby Court will deliver a minimum 10% biodiversity net gain.  | Noted.  |
| United Utilities                | Welcome the flexibility in Policy N2. Also note that biodiversity mitigation / enhancement should not be located directly over water and wastewater assets or where excavation onto the asset would require removal of the biodiversity. Request that this is reflected in the policy and suggested wording is provided.      | Text added to reflect this in the Reasoned Justification (paragraph 14.36).   |
| CPRE                            | Oldham has some valuable biodiversity and ought to be valued. Policies in the Local Plan should require additional BNG where justified. All new development and infrastructure should support the   | Comments noted. Policy N2 seeks to enhance biodiversity including through having regard to the LNRS and BNG. Developers are free to   |

| Respondent | Summary of Comment  | Council Response             |
|------------|---|------------------------------|
|            | aims of the LNRS. Supports brownfield first approach, but in cases where land is of ecological value it may be appropriate for land to be retained for nature or local amenity greenspace | achieve higher than 10% BNG. |

4.58. A detailed summary of the responses received can be found in the Schedule of Comments and the Council's Response document.

4.59. Oldham Council met with United Utilities and Environment Agency on 11 July 2025 where it was explained that the policy had been amended to have regard to the LNRS and text removed relating to BNG to avoid duplication.

4.60. Natural England informally reviewed the amended draft policy with very positive feedback. They recommended adding *“Actions that are not mapped are applicable for consideration across the Borough wherever they are relevant. For example, urban actions are not mapped but are applicable in any urban location and all habitat themes can be checked for relevance with regards to unmapped actions that can inform site layout and design”*. This has been added to paragraph 14.5 in the introduction of Section 14.

4.61. As mentioned above the Council has utilised recommended policy text from GMCA as part of our partnership working.

#### Policy Approach

4.62. There is a need to have regard to Local Nature Recovery Strategies in planning policies. PFE makes reference to the LNRS which was in development at the time but due to timing PFE was not able to develop a localised Greater Manchester policy therefore a local policy has been developed guided by GMCA.

4.63. Policy N2 states 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.

4.64. The policy states that the core local nature sites will be safeguarded and development will avoid harm in line with national planning policy.

4.65. For development that falls within an opportunity area it should seek to:

1. Protect and enhance existing habitats; and
2. Restore and create habitats in a way that significantly improves connectivity within the development site and beyond.

4.66. Where opportunities arise to enhance connectivity, the policy sets out further criterions to consider.

4.67. Regarding BNG the policy makes clear that the LNRS opportunity areas are to be regarded as being of strategic significance in terms of the Biodiversity Net Gain metric.

4.68. The policy then seeks to steer off site BNG as close to the development site as possible so that benefits for nature can be gained locally and where the best biodiversity value will be obtained informed by the LNRS.

4.69. The Reasoned Justification provides more detail on the LNRS, the habitats that can be enhanced in Oldham and local species to be targeted.

4.70. The Reasoned Justification also provides guidance and links to a number of guidance documents prepared by GMCA on BNG.

4.71. Since Draft Plan stage the policy has changed substantially to focus more on the LNRS and how planning applications can have regard to it and less so on BNG. Some amendments have also been made in response to the comments received at Draft Plan stage which have been outlined above.

### Monitoring

4.72. Policy N2 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.

4.73. The Local Plan indicators that will be used to monitor this policy are:

- Single data list 160-00 Proportion of local sites where positive conservation management is being or has been implemented
- Change in areas of biodiversity designations (i.e. SBI updates)
- Percentage of sites designated for nature in active management for nature Conservation
- Percentage of tree canopy cover

4.74. Policy M1 of the Local Plan sets out that where monitoring identifies underperformance or unintended outcomes:

- Further guidance on the relevant policy matter may be produced.
- Policy revisions and an early review of the Local Plan may be triggered.
- Engagement with stakeholders may be undertaken to address delivery barriers.

4.75. As these policies have been informed by PfE Greener chapter, the PfE monitoring framework will also help to monitor this chapter.

4.76. The following PfE indicators will help monitor Policy N2:

- Gross area of new habitat created from the application of biodiversity net gain
- Number, area and condition of sites of biological importance (SBIs)

- Number of trees planted annually (metric to be determined with respect to tree planting programmes and on-site delivery as a result of planning decisions where available)

4.77. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy N2.

#### Integrated Assessment

4.78. The Integrated Assessment of Policy N2 resulted in 18 positive / significantly positive scores and 7 neutral scores.

4.79. Uncertainty was expressed as there may be overlap between BNG and minerals. Any offset sites would not be able to be worked for minerals but wouldn't necessarily sterilise as such. Therefore, no mitigation needed and the Minerals DPD addresses minerals.

4.80. For previous stages of the IA please see the IA report.

4.81. The HRA has screened the policy out. No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.

## Policy N3: Enhancing Green Infrastructure through development

### Summary of evidence

- 4.82. Planning Practice Guidance notes the usefulness of Green Infrastructure Strategies which include assessments of the quality of current green infrastructure and any gaps in provision and that this can inform other plan policies and infrastructure delivery requirements.
- 4.83. Oldham's Green Infrastructure Strategy (2022) provides an up-to-date assessment of current Green Infrastructure provision and opportunities using existing data sets. The spatial data sets produced within the Green Infrastructure Strategy; highlight opportunity areas aligned to local need and the seven priorities and can be used to guide development decisions.
- 4.84. PfE Policy JP-G6 Urban Green space seeks to protect and enhance urban green space and deliver high quality urban green spaces.
- 4.85. Urban Greening Factor is also a tool developed by Natural England to improve provision of Green Infrastructure, particularly in urban areas.

### Draft Local Plan consultation and Duty to Co-operate

- 4.86. At Draft Plan stage the following representations were received regarding Policy N3 which are summarised below along with the Council's response.

**Table 4: Summary of comments and amendments to Policy N3 Enhancing Green Infrastructure through development at Draft Plan Stage**

| Respondent  | Summary of Comment   | Council Response   |
|---|--|--|
| Historic England, CRE8 land & Planning; National Highways; and Kirklees Council | Support the policy.  | Support noted.   |
| Countrywide Partnership / Vistory Group   | Not aware of any justification or evidence for encouraging food production within a residential development. Would be concerned in relation to the implications of this policy in terms of viability, efficient use of land and site layouts. It is considered that this part of the policy should be deleted. The policy also notes that developments should aim for 20% tree cover, this has significant implications in relation to | The Green Infrastructure Strategy provides the justification for the inclusion of the criterion and recommends using Green Infrastructure for food supply where possible as part of the recommended policy approach (see page 132) |

| Respondent               | Summary of Comment  | Council Response   |
|--------------------------|---|--|
|                          | <p>site densities, sites layouts, highways, ongoing maintenance, and the viability of development. It is considered that this part of the policy should be deleted.</p>   | <p>of Green Infrastructure Strategy).</p> <p>In addition, increased opportunities for local food growing is an action within the LNRS.</p> <p>However, the word 'provide' has been replaced with 'facilitate' to put less of a requirement on the developer whilst ensuring that such space can be considered within the site layout. The introductory sentence states 'where appropriate'.</p> <p>Policy text has been amended to delete reference to development sites aiming for 20% tree canopy cover and instead request a more general contribution to increasing the borough's tree canopy as appropriate taking into account the LNRS, BNG and competing priorities such as restorable peat. This amended policy text has been moved to Policy N4.</p> |
| Home Builders Federation | <p>There is no justification or evidence for encouraging food production. Concerned in relation to the implications of this policy in terms of viability, efficient use of land and site layouts. Not sure whether residents of all new developments would want community allotments or food growing opportunities, and it is not clear what would happen where these facilities are not used in an appropriate manner or are not</p> | <p>The Green Infrastructure Strategy provides the justification for the inclusion of the criterion and recommends using GI for food supply where possible as part of the recommended policy approach (see page 132 of Green Infrastructure Strategy). In addition, increased opportunities</p>   |

| Respondent            | Summary of Comment  | Council Response  |
|-----------------------|---|---|
|                       | <p>maintained for food growing. This part of the policy should be deleted. Also concerned in relation to the aim for 20% tree cover, this has significant implications in relation to site densities, sites layouts, highways, ongoing maintenance, and the viability of development. It also not clear how this policy's aim related to Policy N4. This part of the policy should be deleted.</p>  | <p>for local food growing are an action within the LNRS. However, the word 'provide' has been replaced with 'facilitate' to put less of a requirement on the developer whilst ensuring that such space can be considered within the site layout. The introductory sentence states 'where appropriate'.</p> <p>Policy text has been amended to delete reference to development sites aiming for 20% tree canopy cover and instead request a more general contribution to increasing the borough's tree canopy as appropriate taking into account the LNRS, BNG and competing priorities such as restorable peat. This amended policy text has been moved to Policy N4.</p> |
| Canal and River Trust | <p>Believe that access to our waterways can provide multiple economic, social and environmental benefits to local communities. The Trust are developing a framework to measure the benefits of waterways. Efforts to enhance pedestrian and cycling connectivity, as stated in the policy text, could help realise these benefits to a greater extent within the district. Sometimes it is not clear to developers and decision makers that green corridors can also refer to blue spaces (i.e. waterways). Reference to green and blue infrastructure, as opposed to just green, could help to limit potential for this confusion.</p> | <p>The introductory text to Policy N3 explains that Green Infrastructure includes blue infrastructure such as river corridors, ponds and canals.</p>  |

| Respondent                | Summary of Comment  | Council Response   |
|---------------------------|---|--|
| Environment Agency        | <p>Suggest a new criterion 8 regarding the restoration of heavily canalised, culverted waterbodies, amendment of redundant wiers and other ways to offer opportunities for water quality, biodiversity enhancement and flood risk reduction. Suggested text provided.</p>   | <p>Criterion 3 and the Reasoned Justification to Policy N3 has included some of the recommended policy text and references PfE which includes policies on water quality.</p> <p>Text has not been included on SUDS as this is already covered by PfE Policy JP-S4 and Local Plan Policies CC3 and CC4.</p> |
| Natural England           | <p>Supports enhancing green infrastructure within the borough and the links made to ecological networks including policies N1, N2, N4 and IN2. May also wish to consider links to PO8 Uplifting the Health and Well-Being of Our Residents and Local Communities and Policy TM1 in light of greenspace provision and contribution in light of mitigation measures made within PfE Policies JP-G9 and JP-G5.</p>   | <p>Support noted. Policy TM1 and the linkages have now been deleted, however.</p>  |
| Lancashire Wildlife Trust | <p>Agree with and support the use of GI in providing a nature-based solution to climate change in paragraph 15.24. Agree with and support the policy and this comprehensive approach to the protection and enhancement of GI within developments and particularly the GI step-by-step strategy. Stress that the provision of new GI within developments will be essential in ensuring that existing sites GI sites are not overburdened and become degraded through overuse. Particularly important if increased access to green spaces resulted in a degradation of existing fragile or vulnerable ecological assets such as ground nesting birds. Welcome the</p> | <p>Support noted.</p>  |

| Respondent                          | Summary of Comment   | Council Response  |
|-------------------------------------|--|---|
|                                     | <p>approach for additionality in paragraph 15.34 and not just the loss of existing GI and would resolve the potential problems we identified with regard to increased pressure on existing green infrastructure.</p>   |   |
| Sport England                       | <p>Policy should include reference to Sport England's Active Design Principles in creating a high quality, accessible and equitable active environment.</p>  | <p>Reference to the Active Design Principles has been added to the Reasoned Justification.</p>  |
| Lichfields on behalf of Russell LPD | <p>Supports the ambition to enhance green infrastructure. Part 7 of Policy N3 states that development should aim for 20% tree cover, taking account of the retention of existing trees and the future canopy growth of trees to be planted as part of the landscape for the site. The draft policy's Reasoned Justification indicates that the 20% figure has been guided by the Institute of Chartered Foresters' Canopy Cover of England's Towns and Cities guidance.</p> <p>Support the ambition of Policy N3 to increase tree coverage across the borough. However, we note that there is already a policy in PfE (Policy JP-G7) that requires the replacement of trees lost to development at a 2:1 ratio. This is a much more consistent approach to ensuring development increases tree coverage. The 20% tree coverage target included in draft Policy N3 would have a significantly different impact on a development site where there is only 1% tree coverage, as opposed to a site that already has 20% tree coverage. For consistency with PfE, recommend that the 20% blanket target in Policy N3 is replaced with the 2:1 replacement ratio."</p> | <p>Policy text has been amended to delete reference to development sites aiming for 20% tree canopy cover and instead request a more general contribution to increasing the borough's tree canopy as appropriate taking into account the LNRS, BNG and competing priorities such as restorable peat. This amended policy text has been moved to Policy N4.</p> <p>It is felt important to address increasing tree coverage separate from tree replacement, which is mitigation.</p> |

| Respondent                      | Summary of Comment   | Council Response   |
|---------------------------------|--|--|
| Turleys on behalf of Northstone | <p>Support the principle and intention of the policy. However, point seven states that “developments must aim for 20% tree cover, taking account of the retention of existing trees and the future canopy growth of trees to be planted as part of the landscape for the site.” This requirement is unclear and ambiguous, such that it does not comply with paragraph 16(d) of the NPPF. There is no guidance or further explanation on the degree to what is an acceptable level of tree cover if 20% is not possible.</p> <p>It is understood that this requirement has been derived from the Oldham Green Infrastructure Strategy (August 2022), however, it is not clear what the 20% figure is of – is this net developable area of the site, or of the total amount of public open space etc. There is also no link made between this and the BNG requirements. It will be important that this does not contradict or compromise the ability to achieve BNG or the type of habitats required to achieve this.</p> | <p>Policy text has been amended to delete reference to development sites aiming for 20% tree canopy cover and instead request a more general contribution to increasing the borough's tree canopy as appropriate taking into account the LNRS, BNG and competing priorities such as restorable peat. This amended policy text has been moved to Policy N4.</p> |
| United Utilities                | <p>The evaluation of surface water management opportunities should be undertaken early in the design process. Imperative that the approach to design including site analysis is intrinsically linked to making space for water. Sustainable surface water management will be particularly important to consider in the context of the requirement for new streets to be tree lined. It is a national policy requirement that new streets are tree lined as stated in paragraph 136 within the NPPF.</p> <p>Recommend some suggested wording for inclusion within the policy on this matter. Any approach to planting new trees must also give due consideration to the impact on</p>   | <p>Some of the requested text has been added to the Reasoned Justification of Policy N3.</p>   |

| Respondent                          | Summary of Comment  | Council Response   |
|-------------------------------------|---|--|
|                                     | <p>utility services noting the implications that can arise as a result of planting too close to utility services. Trees should not be planted directly over water and wastewater assets or where excavation onto the asset would require removal of the tree. Therefore, recommend some suggested wording for inclusion within the policy on this matter.</p> |  |
| CBRE on behalf of Sigma Property Co | <p>Do not believe that the requirements under the policy in relation to aiming for 20% canopy cover are compliant with the NPPF.</p>  | <p>Policy text has been amended to delete reference to development sites aiming for 20% tree canopy cover and instead request a more general contribution to increasing the borough's tree canopy as appropriate taking into account the LNRS, BNG and competing priorities such as restorable peat. This amended policy text has been moved to Policy N4.</p> |

- 4.87. A detailed summary of the responses received can be found in the Schedule of Comments and the Council's Response document.
- 4.88. Duty to Cooperate meetings took place with Natural England, United Utilities and Environment Agency on 11 July 2025. The EA were updated to say that some of the suggested text has been included within the plan. The policy was not discussed with UU.
- 4.89. Natural England were updated to explain that the policy linkages box included within the emerging publication plan at the time had been updated. However, the decision has since been made to delete the policy linkages boxes.

#### Policy Approach

- 4.90. Policy N3 has been developed to respond to NPPF in using the plan to maintain and enhance networks of habitats and green infrastructure and to embed policy recommendations from the Oldham Green Infrastructure Strategy.
- 4.91. Policy N3 requires new development to make an appropriate contribution to addressing local needs and opportunities for Green Infrastructure provision by retaining, enhancing and creating green spaces and corridors.

4.92. All development will make a proportionate contribution to Green Infrastructure. The policy then lists opportunities for enhancing green infrastructure.

4.93. Development for 20 homes or more or non-residential development over 1,000 square metres is where appropriate required to meet a further three criteria including enhancing landscape setting of the site and pedestrian and cycle connectivity and facilitating for the production of food within residential or mixed-use developments.

4.94. The policy then encourages major development to utilise the Urban Greening Factor calculator to demonstrate the provision of Green Infrastructure.

4.95. Applications for householder and change of use are not required to meet the listed criteria but are expected to protect and aim to enhance Green Infrastructure and incorporate practical measures to support biodiversity such as swift bricks.

4.96. The Reasoned Justification outlines more detail from the Green Infrastructure Strategy and the step-by-step guide on how to implement the strategy.

4.97. It also provides more detail on the Urban Greening Factor tool.

4.98. The justification also includes the text in response to comments made by the Environment Agency, Sport England and United Utilities, as outlined above.

4.99. Since Draft Plan stage, in addition to the amendments outlined above, the policy has been re-ordered to help make the policy flow more logically. The criterion on trees has been removed as trees is addressed under Policy N4 now. Reference is also made to the Local Nature Recovery Strategy.

#### Monitoring

4.100. Policy N3 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.

4.101. The Local Plan indicators that will be used to monitor this policy are:

- Change in areas of biodiversity designations (i.e. SBI updates)
- Percentage of tree canopy cover
- PfE indicator: Number of trees planted annually (metric to be determined with respect to tree planting programmes and on-site delivery as a result of planning decisions where available)

4.102. Policy M1 of the Local Plan sets out that where monitoring identifies underperformance or unintended outcomes:

- Further guidance on the relevant policy matter may be produced.
- Policy revisions and an early review of the Local Plan may be triggered.
- Engagement with stakeholders may be undertaken to address delivery barriers.

4.103. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy N3.

#### Integrated Assessment

4.104. The Integrated Assessment of Policy N3 resulted in 21 positive / significantly positive scores and 5 neutral scores. No amendments were made to the policy as a result of the IA at Publication Plan Stage.

4.105. The HRA has screened the policy out. No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.

4.106. For previous stages of the IA please see the IA report.

## Policy N4: Trees

### Summary of Evidence

- 4.107. NPPF states planning policies should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.
- 4.108. Planning Practice Guidance also outlines the benefits of well-placed trees.
- 4.109. The Greater Manchester Five-year Environment Plan, PfE, the Greater Manchester LNRS and the Oldham Green Infrastructure Strategy all aim to plant more trees.
- 4.110. To maintain or increase a level of mature trees, young trees are needed to restock the larger size classes (with surplus) to include planning for mortality.
- 4.111. The Green Infrastructure Strategy recommends a policy approach which includes retaining existing trees and hedgerows wherever possible and a target of 20% for tree canopy cover, taking account of the retention of existing trees and the future canopy growth of trees.

### Draft Local Plan consultation and Duty to Co-operate

- 4.112. At Issues and Options stage<sup>22</sup> (2021) the consultation asked “Do you think Oldham should continue to have a policy regarding the protection of trees?”
- 4.113. The Comments and Response Schedule<sup>23</sup> summarises the comments received and the Council’s response to this question in Table GI7. All respondents supported the need for a local tree protection policy.
- 4.114. As a result, a policy was drafted in consultation with the Council’s Arboricultural Officers.
- 4.115. It was considered that PfE Policy JP-G7 require fewer trees than the previous saved UDP Policy D1.5 which it had superseded, which had required a ratio of three new native trees for each mature or semi-mature tree lost. However, PfE does state ‘*or other measures that would also result in a net enhancement in the character and quality of the treescapes and biodiversity value in the local area, with a preference for on-site provision*’. A local policy can ensure a net gain in trees, where trees are lost, is achieved.
- 4.116. Considering the national policy context and evidence to support higher tree canopy and the importance of mature trees it is considered that the Local Plan should expand on PfE, as otherwise for Oldham this would be a policy that achieves less

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<sup>22</sup> The Issues and Options documents are available at:

[https://www.oldham.gov.uk/info/201233/local\\_plan\\_review/1809/issues\\_and\\_options](https://www.oldham.gov.uk/info/201233/local_plan_review/1809/issues_and_options)

<sup>23</sup> The Issues and Options Comments and Response Schedule is available at:

[https://www.oldham.gov.uk/downloads/file/7824/Issues\\_and\\_Options\\_-\\_Comments\\_and\\_Response\\_Schedule](https://www.oldham.gov.uk/downloads/file/7824/Issues_and_Options_-_Comments_and_Response_Schedule)

than the previous policy and would make achieving a 20% tree canopy cover target and LNRS more difficult to achieve.

4.117. A scoping exercise was undertaken looking at other districts tree policies which included the approach taken by [Bristol City Council](#)<sup>24</sup> (Policy BG4), which is nearing the end of examination. This approach has already been used for a number of years through the Bristol City Council [Planning Obligations Supplementary Planning Document \(SPD\)](#)<sup>25</sup> adopted September 2012 which sets out the number of replacement trees to compensate for loss of existing trees and the financial contribution where an obligation is needed.

4.118. As part of the examination into the Bristol City Council Publication Plan the inspectors have asked questions (see Matter 10 Q10.6) on whether the tree compensation targets are justified. Matter 10 hearing statement responds to these questions and outlines:

*The tree compensation standard set out in the table continues an existing policy approach that has been in place for many years, currently set out in adopted policy DM17 (DPD002). The standard reflects the value of trees as multifunctional green infrastructure assets, with the level of compensation increasing in proportion with the size of any existing trees to be lost.*

4.119. The Inspectors action notes follow on from the hearing which do not suggest any action is relation to the ratio approach.

4.120. [Eastleigh Council's Trees and Development SPD](#)<sup>26</sup> is another example, which was based on the Bristol approach.

4.121. Policy N4 was therefore drafted using these policies as the starting point and consulted on at Draft Plan stage setting out the tree replacement requirements.

4.122. At Draft Plan stage the following representations were received regarding Policy N4 (called Tree Replacement at the time) which are summarised below along with the Council's response.

**Table 5: Summary of comments and Council Response to Policy N4 Compensating Tree Loss at Draft Plan Stage**

| Respondent                | Summary of Comment  | Council Response   |
|---------------------------|---|--|
| Lancashire Wildlife Trust | Agree with and support the approach to tree replacement. The policy emphasises that simply replacing a larger tree with a small whip is not a like for like replacement. Agree with | Support Noted. The policies on nature will ensure that the GM Local Nature Recovery Strategy is taken into account |

<sup>24</sup> The Bristol City Council Publication Plan <https://www.bristol.gov.uk/files/documents/6894-bristol-local-plan-main-document-publication-version-nov-2023/file>

<sup>25</sup> The Planning Obligations SPD can be found at <https://www.bristol.gov.uk/residents/planning-and-building-regulations/planning-applications/community-infrastructure-levy-cil-and-planning-obligations/planning-obligations>

<sup>26</sup> Eastleigh Council's Trees and Development SPD is available at: <https://www.eastleigh.gov.uk/media/11241/adopted-trees-and-development-spd-april-22.pdf>

| Respondent  | Summary of Comment  | Council Response  |
|---|---|---|
|   | <p>and welcome in paragraph 15.48 that the species and location for tree planting should be appropriate. Care needs to be taken so as to not adversely affect open country species, in particular ground nesting birds such as Lapwing and Skylark.</p>   | <p>which has actions to benefit target species including skylark and lapwing.</p>   |
| Countryside Partnership / Vistory Group; and Home Builders Federation | <p>The tree replacement ratios used have potential to have a significant impact on the land uptake for any development and may have significant implications for the density of developments, this in itself has potential to have a significant impact on the viability of developments. The tree replacement ratio may also have implications in relation to highway provision and highway maintenance and again may need to be given further consideration by the Council and the developers of these sites.</p>   | <p>Avoiding tree loss, particularly mature trees, in the first instance is part of the mitigation hierarchy and sites should be designated to retain trees. The Publication Plan is supported by a viability appraisal. The ratios have been used elsewhere including by Bristol City Council and Eastleigh Council. The Reasoned Justification has been amended to make clear that highways may also be consulted on the locations and species of trees.</p> |
| Alan Chorlton   | <p>The policy is too overly prescriptive and will result in unnecessary delays in determining and submitting applications.</p>  | <p>The policy provides a consistent and transparent approach to addressing tree replacement. Council Officers will be able to provide comments when considering development proposals.</p>  |
| Turleys on behalf of Northstone                                       | <p>Agree to the principle of securing replacement tree planting where the removal of trees has been deemed necessary to facilitate a proposed development. However, consider that Table N1 is overly prescriptive and not supported by any technical evidence or policy basis. The first sentence of the policy states that such a fixed number system "has been used elsewhere"; however, the policy or supporting text does not confirm where this has been used and therefore an assessment cannot be made as to whether this system is appropriate. Until such time that this</p> | <p>The policy provides a consistent and transparent approach, which is not considered to be too prescriptive. The ratios have been used elsewhere including by Bristol City Council and Eastleigh Council. The evidence supporting the approach is outlined above.</p>  |

| Respondent   | Summary of Comment  | Council Response |
|--|---|------------------|
|  | approach can be justified, suggest this policy is amended to remove the approach to replacement tree planting through Table N1.   |                  |
| Cllr Howard Sykes - Oldham Liberal Democrats Group | Tree coverage and appropriate species should be used to aid with flood mitigation as well as to ensure that appropriate planting is undertaken in residential areas. Each district should have a tree-planting 'wish list' in place to aid with bids to 'City of Trees' and other initiatives which deliver more tree-planting and biodiversity impact. | Comments noted.  |

4.123. A detailed summary of the responses received can be found in the Schedule of Comments and the Council's Response document.

4.124. Duty to Co-operate meetings took place in Summer 2025. However, this policy was not a focus for statutory consultees.

#### Policy Approach

4.125. As outlined above Policy N4 is considered necessary in addition to PfE Policy JP-G7 due to the need to support increased tree canopy and the importance of mature trees.

4.126. Policy N4 required development to aim to protect and retain tree cover. Developments will demonstrate how trees and hedgerows and their health have been retained. Development will also, as appropriate, contribute to increasing the borough's tree canopy cover.

4.127. The policy sets out criteria for considering loss or damage to trees and makes clear that there will be a presumption against development that causes loss of or deterioration to ancient woodland, and ancient and veteran trees.

4.128. The policy then sets out the tree replacement ratios. This uses PfE 2:1 ratio as its basis – for category C trees (trees of low quality). However, Category A (trees of high quality) and Category B trees (trees of moderate quality) will be replaced as shown in the policy table which is related to trunk diameter.

4.129. Veteran/Ancient/Historic / Exceptional trees would be addressed separately.

4.130. The Reasoned Justification explains more about the importance of retaining mature trees and replacing with enough young trees.

4.131. The justification also explains why the trunk diameter starts at 75mm in the policy.

4.132. The justification outlines the use of CAVAT and government guidance on irreplaceable habitats (such as ancient woodland and ancient or veteran trees).

4.133. The justification then gives more information around the requirements of replacement trees and off-site solutions.

4.134. Since Draft Plan stage the policy has been amended to make the policy a more general policy around trees – moving some of the policy intentions from Draft Plan Policy N3 into Policy N4 to increase tree canopy cover.

4.135. The text regarding the PfE tree replacement requirement has been corrected – from one to two replacement trees.

4.136. The policy has also been amended so that the trunk diameter now starts at 75mm.

4.137. The Reasoned Justification has been expanded to provide more explanation for the need to have mature trees adequately replaced, as well as further information on planning application requirements and Tree Preservation Orders (TPOs).

### Monitoring

4.138. Policy N4 will be monitored by the Local Plan monitoring framework in line with Local Plan policy M1.

4.139. The Local Plan indicators that will be used to monitor this policy are:

- Percentage of tree canopy cover

4.140. Policy M1 of the Local Plan sets out that where monitoring identifies underperformance or unintended outcomes:

- Further guidance on the relevant policy matter may be produced.
- Policy revisions and an early review of the Local Plan may be triggered.
- Engagement with stakeholders may be undertaken to address delivery barriers.

4.141. As these policies have been informed by PfE greener chapter, the PfE monitoring framework will also help to monitor this policy.

4.142. The following PfE monitoring indicator will help to monitor this policy:

- Number of trees planted annually (metric to be determined with respect to tree planting programmes and on-site delivery as a result of planning decisions where available)

4.143. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy N4.

### **Integrated Assessment**

4.144. The Integrated Assessment of Policy N4 resulted in 12 positive / significantly positive scores and 14 neutral scores. No amendments were made to the policy as a result of the IA at Publication Plan Stage.

4.145. The HRA has screened the policy out. No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.

4.146. For previous stages of the IA please see the IA report.

## 5. Conclusion

### Providing an Appropriate Strategy

- 5.1 Policies N1 to N4 of the Oldham Local Plan: Publication Plan provide the policy framework for ensuring that we address the biodiversity emergency and restore nature.
- 5.2 In terms of the test of soundness listed at paragraph 36 of NPPF it is considered that these have been met as follows:
  - a) **Positively prepared:** the Oldham Local Plan: Publication Plan supports delivery of PfE which provides the strategic direction and context for the borough. The Local Plan sets out the borough's multi-functional green infrastructure network, as identified in PfE, will be enhanced. The Local Plan identifies the borough's nature biodiversity hierarchy; and sets out how developments should have regard to the LNRS prepared by GMCA and supported by the Greater Manchester districts and Natural England; how developments should have regard to Oldham's Green Infrastructure Strategy and a more detailed localised policy on trees. The policies have responded positively to responses received as part of Regulation 18 consultation and informal feedback.
  - b) **Justified:** policies N1 to N4 provide an appropriate strategy in relation to addressing biodiversity matters across Oldham. Policy N1 reflects the nature designations and other areas of biodiversity value in Oldham. Information by Greater Manchester Ecology Unit provides the Council with up-to-date information on Sites of Biological Importance on a rolling basis. A Green Corridors and Links review has been undertaken and the amended Green Corridors and Links have been reflected on the Policies Map.

The Greater Manchester LNRS has been prepared by GMCA and published. Oldham Council and the other Greater Manchester districts, Natural England and other stakeholders proactively inputted into this. The LNRS provides the evidence for Policy N2 and the policy is based on a template shared by GMCA to ensure a consistent approach across Greater Manchester. The approach to BNG is justified through continued efforts to ensure that Greater Manchester districts can offer habitats banks locally.

Policy N3 is justified by the Oldham Green Infrastructure Strategy, which planning practice guidance states is a useful tool. The policy is also justified by Natural England's Urban Greening Factor tool.

Policy N4 is justified through the Greater Manchester Five-year Environment Plan, PfE, the GM LNRS and the Oldham Green Infrastructure Strategy and a review of similar policy approaches to tree replacement elsewhere.

These policies all support the Publication Plan Vision which states we will have responded to both the Biodiversity and Climate Change emergencies through the protection, restoration and enhancement of the natural environment....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.

The policy will help implement the following plan objective:

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.

The policies will help ensure Oldham is "Green and Growing" and A Great Place to Live reflected in the Oldham Plan and Corporate Plan.

c) **Effective:** the Oldham Local Plan: Publication Plan supports delivery of PfE which sets out the Green Infrastructure network. The plan period of up to 2039 reflects that of PfE and continued effective joint working arrangements with PfE districts on cross-boundary strategic matters, will support delivery of the joint and local plans. Finally, deliverability of the Oldham Local Plan: Publication Plan is also evidenced by the Infrastructure Delivery Plan and Statement of Common Ground.

d) **Consistent with national policy:** policies N1 to N4 support delivery of sustainable development in accordance with relevant national policy, in particular by:

- i. protecting and enhancing sites of biodiversity or geological value and soils;
- ii. distinguishing between the hierarchy of international, national and locally designated sites;
- iii. taking a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries;
- iv. recognising the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
- v. minimising impacts on and providing net gains for biodiversity.

## Appendix 1: Summary of review of Green Corridors and Links designation

Table 6: Summary of review of Green Corridors and Links designation<sup>27</sup>

| Green Corridor and Link                                  | Designation being taken forward | Boundary changes |
|--|---------------------------------|------------------|
| Alexandra Park   | Yes                             | No               |
| Ashton Road / Simkin Way                                 | No                              | N/A              |
| Cemetery rear of Hibbert Crescent, Failsworth            | No                              | N/A              |
| Cemetery / Cricket Ground south of Duchess Street        | No                              | N/A              |
| Chadderton Cemetery                                      | Yes                             | No               |
| Chew Valley Road to Halls Way, Greenfield                | Yes                             | No               |
| Clayton Playing Fields, Broadway                         | No                              | N/A              |
| Egerton Street to Shaw Road (Oldham Edge)                | Yes                             | Yes              |
| Foxdenton Hall Park                                      | Yes                             | Yes              |
| High Crompton Park, Rushcroft Road                       | No                              | No               |
| Hill End Road to Gatehead Croft, Delph                   | Yes                             | No               |
| Lees New Road to Greenacres Road (1)                     | Yes                             | Yes              |
| Lees New Road to Greenacres Road (2)                     | Yes                             | No               |
| Lees New Road to Greenacres Road (3)                     | No                              | N/A              |
| Long Clough Broadway, Royton                             | No                              | N/A              |
| Lydgate Tunnel / Rear Oaklands Park, Grasscroft (1)      | Yes                             | Yes              |
| Lydgate Tunnel / Rear of Oaklands Park, Grasscroft (2)   | Yes                             | Yes              |
| Manchester Road Greenfield to Ryefields Drive, Uppermill | Yes                             | Yes              |
| Mill Lane / Thorp Road, Royton                           | Yes                             | Yes              |
| Northdowns / Rochdale Road, High Crompton                | No                              | N/A              |
| Oaklands Road  | Yes                             | Yes              |
| Railway – Morton Street, Hardman Lane, Failsworth        | Yes                             | Yes              |

<sup>27</sup> Maps of the Green Corridors and Links being de-designated and those with boundary changes can be found in Appendix 11 of the Publication Plan.

| <b>Green Corridor and Link</b>                            | <b>Designation being taken forward</b> | <b>Boundary changes</b> |
|---|--|-------------------------|
| Rear of Broadbent Road / Whetstone Hill Lane (up to here) | No                                     | N/A                     |
| Rear of Somerset Road, Failsworth                         | No                                     | N/A                     |
| River Tame from Delph New Road to Mow Halls Lane          | Yes                                    | No                      |
| Rear of Elk Mill  | Yes                                    | Yes                     |
| Spurn Lane, Diggle  | Yes                                    | No                      |
| Stock Lane  | No                                     | N/A                     |
| Stonebreaks Road, Copper Street                           | Yes                                    | Yes                     |
| Sholver Lane  | Yes                                    | Yes                     |
| Wall Hill Road, Dobcross                                  | Yes                                    | No                      |
| Wall Hill Road / Hudsteeds, Dobcross                      | No                                     | N/A                     |
| Wrigley Head, Failsworth                                  | No                                     | N/A                     |
| Wrigley Head, Failsworth (1)                              | Yes                                    | Yes                     |