

## **Report to CABINET**

# **Approval of Greater Manchester Local Nature Recovery Strategy**

**Portfolio Holder:** Cllr Elaine Taylor Cabinet Member for Neighbourhoods

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### **Reason for Decision**

To agree that Oldham Council are content for the Local Nature Recovery Strategy to be published and authorise the Assistant Director Planning, Transport and Housing Delivery to confirm the same in writing to the GMCA and the Mayor as the responsible body for the GM Local Nature Recovery Strategy.

### **Executive Summary**

The Environment Act 2021 introduced the requirement for Local Nature Recovery Strategies (LNRS) to cover the whole of England, to set out where and how efforts should be focused locally to contribute to halting and reversing the decline in biodiversity.

The Greater Manchester LNRS is an opportunity to set out a long-term vision for a greener city region, where nature is returning, and more people have better access to greenspace.

The strategy covers the following:

- A shared vision for nature recovery in Greater Manchester
- Shared priorities and targets for nature recovery
- Actions we can all work towards to help deliver them
- Maps of a Greater Manchester Nature Network made up of:
  - Core local nature sites - existing valuable areas for nature

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- Nature Recovery Opportunity Areas - opportunity areas where action should be focused across the city-region

Officers at Oldham Council have inputted into the LNRS through workshops and meetings.

The LNRS was also publicly consulted on between November 15th 2024 and January 31st 2025.

This report seeks to agree that Oldham Council are content for the LNRS to be published and authorise the Assistant Director Planning, Transport and Housing Delivery to confirm the same in writing to the GMCA and the Mayor as the responsible body for the GM Local Nature Recovery Strategy.

The Environment Act 2021 sets out that local authorities will need to “have regard” to the LNRSs in local planning policy and decisions.

## **Recommendations**

Oldham Council are recommended to:

- i) have regard to the agreed comments of the Place, Economic Growth and Environment Scrutiny Board on this item from the meeting on 12th June 2025;
- ii) note that this item will be exempt from call-in, under Rule 14 of the Constitution, as the report has already been considered by the Place, Economic Growth and Environment Scrutiny Board;
- iii) agree that they are content for the Local Nature Recovery Strategy to be published; and
- iv) authorise the Assistant Director Planning, Transport and Housing Delivery to confirm the same in writing to the GMCA and the Mayor as the responsible body for the GM Local Nature Recovery Strategy.

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## Approval of Greater Manchester Local Nature Recovery Strategy

### 1 Background

#### Biodiversity emergency

- 1.1 Greater Manchester Combined Authority (GMCA) declared a biodiversity emergency in March 2022. This reflected the need for more urgent and ambitious action to tackle the decline in the diversity and abundance of key species and habitats across the city-region.
- 1.2 The extent of this decline is set out in the “State of Nature in Greater Manchester” report, published in March 2024. Bringing together available local evidence, it sets out the declining trends in local wildlife populations, the challenges in growing and managing our most important spaces for nature, the use of land and pressures this puts on nature and the varying degrees to which people across the city-region have access to it. This all puts under increasing pressure the benefits we receive from the natural environment, particularly for health and wellbeing and flood risk reduction.
- 1.3 There have been efforts across Greater Manchester, both within the private, public and third sectors, to try to halt this decline, but despite these, the decline continues, reflecting the broader picture across England.

#### What are Local Nature Recovery Strategies

- 1.4 At a national level, there has been a recognition that the current overall approach to halting this decline is not working.
- 1.5 The Environment Act 2021 introduced a range of measures to seek to halt it. This included the requirement for Local Nature Recovery Strategies (LNRS) to cover the whole of England, to set 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.
- 1.6 The Greater Manchester LNRS is an opportunity to set out a long-term vision for a greener city region, where nature is returning, and more people have better access to greenspace.
- 1.7 The strategy is aimed at encouraging all organisations, communities and residents to take action to support nature’s recovery. It will be of particular importance for landowners and, once adopted, will incentivise investment through Biodiversity Net Gain and environmental land management schemes.
- 1.8 In preparing the strategy, to meet the requirements of the Environment Act 2021, underpinning regulations and statutory guidance, and to adapt this to what’s needed locally, the GMCA produced a draft for public consultation in October 2024. This draft then underwent public consultation from November 15<sup>th</sup> 2024 to January 31<sup>st</sup> 2025. There were just over 400 responses to the public consultation. No significant disagreement with key components of the draft strategy emerged during the consultation, and there was broad support for the vision, aims and priorities set out in the strategy. GMCA has assessed the feedback received through the public consultation and will publish a full response to the public consultation alongside the final strategy.
- 1.9 The LNRS links to the Council’s Corporate Plan priority for Green and Growing.

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- 1.10 In addition, the LNRS is also referenced in National Planning Policy Framework (NPPF) which states that where land is identified as having potential for habitat creation or nature recovery within a LNRS, development proposals should contribute towards these outcomes.
- 1.11 In terms of the purpose of the report there are no / limited implications for:
- (a) Community Cohesion Implications, including crime and disorder implications under Section 17 of the Crime and Disorder Act 1998 – N/A
  - (b) Risk Assessments – The LNRS is required under the Environment Act 2021. There is a risk the LNRS will be seen as a barrier to development, but the strategy explains its status.
  - (c) If relevant, Co-operative Implications, Human Resource Implications, IT implications, Property Implications, Procurement Implications and Environment and Health and Safety Implications - the LNRS will help to guide investment and decisions to improve the environment and the associated health benefits that flow from enhanced wildlife. The council may have assets within the opportunity areas and is required to have regard to the LNRS in land use management / development design etc. The council will work with GMCA to help play a role in implementing the LNRS such as working to get funded Management Plans.

## 2 **Current Position**

### What the Greater Manchester Local Nature Recovery Strategy contains

- 2.1 The strategy covers the following, as required by the Environment Act 2021, regulations thereunder and statutory guidance issued to responsible authorities:
- A shared vision for nature recovery in Greater Manchester
  - Shared priorities and targets for nature recovery
  - Actions we can all work towards to help deliver them
  - Maps of a Greater Manchester Nature Network made up of:
    - Core local nature sites - existing valuable areas for nature
    - Nature Recovery Opportunity Areas - opportunity areas where action should be focused across the city-region
- 2.2 Across the borough of Oldham the LNRS sets out opportunities for:
- Woodlands, Trees, Scrub and Hedgerow;
  - Grasslands, Farmland and Lowland Heath;
  - River, Canal and Waterbodies;
  - Lowland, Wetland and Mossland; and
  - Upland Moorland.

### Maps within the strategy

- 2.3 To drive nature recovery, we need to set out the best places to act for nature across Greater Manchester. The strategy sets out a Nature Network for Greater Manchester. This has its basis in 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.

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- 2.4 These five principles are reflected in the two main maps<sup>1</sup> set out in the strategy, as follows:
- Map of core local nature sites** (areas of particular importance for biodiversity):
- 2.5 This sets out Greater Manchester's existing wildlife sites, including those designated and protected at an international, national and local level, as well as irreplaceable habitats<sup>2</sup>. What to include in this map is prescribed by Defra through statutory guidance and termed "areas of particular importance for biodiversity."
- Nature recovery opportunity areas map** (areas that could become of particular importance for biodiversity)
- 2.6 This sets out how our core local nature sites can be joined up to create a Nature Network. These are areas where action to enhance, restore or create different types of habitats (i.e. woodlands, grasslands, moorlands, waterbodies and wetlands) would expand and better connect our core local nature sites (our "areas which could become of particular importance for biodiversity").
- 2.7 What to include in the Nature recovery opportunity areas map is not prescribed in legislation or statutory guidance: GMCA has taken the following approach, building on previous work by the Greater Manchester Ecology Unit (GMEU) and local authorities, comprising three stages:
1. Ecological mapping – used connectivity modelling to map a nature network of how best to join up core local nature sites.
  2. Refinement with local views and knowledge – local authorities and other stakeholders inputted to refine the map based on local knowledge.
  3. Mapping measures on the nature network map – based on suitable land cover type and any constraints on the site.
- 2.8 This results in a final map, setting out the priority areas within which to focus action to create a joined-up Nature Network across Greater Manchester. They are spaces that are often used and managed in a range of different ways and for different purposes (e.g. for food production or recreation). These areas are not designated or protected, nor are they barriers to development. Development within these opportunity areas (or where it could have an impact on these areas) should seek to support and deliver on the priorities set out for these areas and help to work towards the wider ambitions of the Nature Network alongside other ambitions.
- 2.9 The Nature Network does not preclude action elsewhere across the city-region – the strategy sets out the reasons, priorities and actions to support nature and access to it across the city-region.
- 2.10 Officers at Oldham Council have attended workshops and meetings to review the opportunity areas. Officers have suggested additions (such as proposed Local Green Spaces, countryside sites and northern roots). Only one deletion has been requested to the core map to reflect a Site of Biological Importance (SBI) that was deleted in 2018 at Royton Moss.
- Status of the Greater Manchester Local Nature Recovery Strategy, including the maps

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<sup>1</sup> The maps can be viewed at: <https://www.greatermanchester-ca.gov.uk/what-we-do/environment/natural-environment/our-plan-for-nature-recovery/>

<sup>2</sup> **Irreplaceable habitats** for the LNRS are those set out in the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024. Available on the Legislation.gov website (external link).

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Overall:

- 2.11 As a local authority, Oldham Council must have regard to any relevant Local Nature Recovery Strategy when performing its duty under section 40 of the Natural Environment and Rural Communities Act 2016 when considering what action they can take to “further the general biodiversity objective” of conserving and enhancing biodiversity when delivering their functions.

In planning:

- 2.12 The Environment Act 2021 sets out that local authorities will need to “have regard” to the LNRSs in local planning policy and decisions.
- 2.13 The Levelling up and Regeneration Act 2023 included a clause which creates a new requirement on all relevant plan-makers and requires all tiers of planning to take account of the relevant LNRS. Guidance<sup>3</sup> on how local planning authorities (LPASs) must have regard to the LNRS and how LPAs should do this has been published.
- 2.14 The LNRS may be a material consideration in the planning system. Development proposals will need to have regard to the Strategy and should consider how nature is integrated into the design and operation of new development. The strategy will also help to guide mandatory biodiversity net gain (BNG) investments.
- 2.15 However, it is important to note that the LNRS (which includes the mapping of opportunity areas) does not introduce any new protections of sites or designations – for example, the opportunity areas do not have any status in planning – nor introduce any new barriers to development. However, the GMCA and local authorities will continue to work together as to how the LNRS can be reflected in the planning process.
- 2.16 It is only the core areas which have status, which is already the case as this consists of sites for their value to nature (including Sites of Special Scientific Interest (SSSIs); Special Protected Areas (SPAs), Special Areas of Conservation (SACs), National Nature Reserves (NNRS), Local Nature Reserves (LNRs), locally designated Sites of Biological Importance (SBIs) and Local Wildlife Sites (LWSs) and irreplaceable habitat.
- 2.18 Overtime, however, there could be more areas protected for nature. The strategy proposes to increase the amount of land protected from 11% to 15% across Greater Manchester. However, any new local designations would be a separate approval process, as it is now through reports on updates from GMEU. Oldham has already increased the number and extent of SBIs from 18 (142.4 hectares) in 1984 to 39 (3463.7 hectares) in 2021 and considers the implications of these with each decision.

Governance and development of the Greater Manchester Local Nature Recovery Strategy:

- 2.16 Given the above, the GMCA on behalf of the Mayor, has been working in consultation with the ten local authorities and stakeholders across the city-region over the past 18 months to develop the Greater Manchester LNRS.
- 2.17 Officers across Oldham Council (strategic planning and countryside officers) have been closely consulted and involved in the development of the Greater Manchester LNRS. This has included monthly meetings and individual sessions to input into the key elements of the strategy, particularly:

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<sup>3</sup> Guidance on the LNRS is available at <https://www.gov.uk/guidance/natural-environment#local-nature-recovery-strategies>

- The vision and aims.
- The priorities and measures.
- The Nature Network map of opportunity areas.

2.18 The strategy is therefore aligned with the Oldham Green Infrastructure Strategy in terms of thriving wildlife and seeking to create nature recovery networks and the Green New Deal Strategy in terms of the role that Northern Roots can contribute towards nature recovery.

Legal/procedural aspects:

- 2.19 The Environment Act 2021 set out that the Secretary of State would determine the geographical areas for each LNRS and the “responsible authority” for developing it – for Oldham, the area for the strategy is Greater Manchester and the responsible authority is the Mayor of Greater Manchester.
- 2.20 Each local authority in Greater Manchester is a “supporting authority” under Regulation 3 of The Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023. Natural England and the Peak District National Park are also designated supporting authorities.
- 2.21 These supporting authorities are to be closely involved in the development of the LNRS and their approval sought before publication of the draft strategy for consultation and the final strategy itself.
- 2.22 Under Regulation 13 of those regulations, the responsible authority must provide all supporting authorities with its final LNRS prior to publication. At the same time, the responsible authority must inform the supporting authorities in writing of its intended date for publication of its LNRS.
- 2.23 Each supporting authority is asked to confirm it is content for the Mayor of Greater Manchester and the GMCA for the publication of the strategy to proceed. Supporting authorities can within 28 days of the receipt of the final LNRS give a publication advisory notice to the responsible authority if they disagree with the publication of the strategy. The provision of this notice can be based on the following grounds under Regulation 15 of the LNRS regulations (a) the supporting authority considers that part of a final LNRS cannot be justified based on the results of the consultation undertaken by the responsible authority or (b) the supporting authority considers that the final LNRS is materially deficient.
- 2.24 If each supporting authority either confirms or does not object to the publication of the strategy within 28 days, the GMCA will provide notice to the secretary of the state of their intention to publish.
- 2.25 If Oldham Council wishes to raise a publication advisory notice with the final GM LNRS it must do so in writing to GMCA, provide reasons for the objection and do so within 28 days of the receipt of the final strategy.
- 2.26 GMCA would then consider this objection(s) and whether it (or they) can be accommodated within the final version or notify the secretary of state. There are then two possible outcomes:
1. A resolution to the objection is agreed between GMCA and Oldham Council (i.e. the final version is changed to meet the objection).
  2. As a last resort, if a resolution cannot be agreed, the responsible authority can request the Secretary of State’s permission to publish.

### 3 Options/Alternatives



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- 3.1 Option 1 - Oldham Council to agree that they are content for the Local Nature Recovery Strategy (LNRS) to be published; and authorise the Assistant Director Planning, Transport and Housing Delivery to confirm the same in writing to the GMCA and the Mayor as the responsible body for the GM LNRS. This would allow support for the GM LNRS to be expressed, allowing the LNRS to be published once all supporting authorities have confirmed their support. There are no disadvantages to this option.
- 3.2 Option 2 - Oldham Council to disagree that they are content for the Local Nature Recovery Strategy (LNRS) to be published; and to give a publication advisory notice to the responsible authority outlining that they disagree with the publication of the strategy based on one the grounds under article 15 of the LNRS regulations within 28 days of the receipt of the final LNRS. This would allow for any valid objections to be raised and considered but would delay a nature recovery network being published.

#### **4 Preferred Option**

- 4.1 Option 1 - Oldham Council to agree that they are content for the Local Nature Recovery Strategy to be published; and authorise the Assistant Director Planning, Transport and Housing Delivery to confirm the same in writing to the GMCA and the Mayor as the responsible body for the GM Local Nature Recovery Strategy. This would allow support for the GM LNRS to be expressed, allowing the LNRS to be published once all supporting authorities have confirmed their support. There are no disadvantages to this option.

#### **5 Consultation**

- 5.1 Officers at Oldham Council have inputted into the LNRS through workshops and meetings. The LNRS was also publicly consulted on between November 15th 2024-January 31st 2025.

#### **6 Financial Implications**

- 6.1 The Local Nature Recovery Strategy will be published on the GMCA website. There are no significant costs relating to the publishing of the Local Nature Recovery Strategy.

(John Hoskins)

#### **7 Legal Implications**

- 7.1 Under sections 104 and 105 of the Environment Act 2021 there are to be local nature recovery strategies for areas in England to be prepared by responsible authorities appointed by the Secretary of State. Under Regulation 18 of the Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023, the Mayor (as responsible authority) may not publish the final local nature recovery strategy until either 28 days have expired beginning with the date on which all supporting authorities for the strategy were provided with the strategy or if all the supporting authorities confirm in writing that they are content for the local nature recovery strategy to be published. (A Evans)

#### **8 Equality Impact, including implications for Children and Young People**

- 8.1 The completed Oldham Impact Assessment can be found below:



LNRS Impact  
Assessment Tool.pdf



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8.2 The tool only assesses the GM LNRS as it relates to Oldham. It identifies that aside from race the GM LNRS has neutral effects on the equality characteristics. The GM LNRS is identified as having a Moderate Positive impact on the race equality characteristic as the strategy specifically notes that those experiencing racial inequalities are nearly twice as likely to live in areas with the least green space. The GM LNRS was found to have a moderate positive impact on the councils Corporate Priorities of 'A Great Place to Live' and 'Happier Healthier Lives' and a strong positive impact on 'Green and Growing'.

9 **Key Decision**

9.1 Yes.

10 **Key Decision Reference**

11.1 RBO-03-25.

12 **Background Papers**

12.1 N/A.

13 **Appendices**

13.1 Appendix 1a - Nature for All - A Local Nature Recovery Strategy for Greater Manchester

Appendix 1b - Relationship with other GM policies and strategies

Appendix 2 – Methodological Statement: Evidence used and processes undertaken

Appendix 3 - State of Nature Report

Appendix 4 - Stakeholder Engagement undertaken

Appendix 5 – 'Plan for Nature' Survey Report

Appendix 6 - Detailed Description of Greater Manchester landscapes and habitats

Appendix 7 - Overview of the headline targets developed

Appendix 8 – Habitat priorities and actions

Appendix 9 – Public Consultation Report: Record of Responses

Appendix 10 - Public Consultation Report: GMCA Response to the Public Consultation

Appendix 11 – Oldham LNRS Map