

Oldham

Local Plan

**Draft Local Plan: Climate Change and
Flood Risk Topic Paper**

December 2023



Oldham
Council

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1. Introduction and Purpose

- 1.1. This is the Addressing Climate Change Topic Paper and is one of ten topic papers produced to inform the consultation on the Oldham Local Plan: Draft Plan.
- 1.2. All of the papers can be found on the [Oldham Council website](#)¹.
- 1.3. The topic papers set out how the preferred option for each policy under the relevant Draft Local Plan 'Chapter' has been developed. As such, the topic papers support and complement the Draft Plan consultation document as they provide a detailed explanation of the basis for each preferred policy approach. The policies are presented in a consistent format in each paper with sufficient information to provide a comprehensive appreciation of the background to, and development of, the preferred option.
- 1.4. The topic papers set out the national, regional and local planning context and then for each policy, or group of policies where relevant, the topic paper details how comments received to the Issues and Options consultation and relevant evidence have helped to shape the proposed policy approach. Including how this has also been informed by the findings of the Integrated Assessment. There are also details of further work that may be required to inform the next stage of the plan-making process – the Regulation 19 Publication Plan.
- 1.5. The preparation of a Local Plan must be informed by consultation and engagement as well as statutory processes, such as Integrated Assessment and Habitats Regulations Assessment, and address the requirements of national planning policy. These important elements of plan-making have, therefore, informed development of the Draft Local Plan and helped to shape the proposed policy approach. These supporting documents are available to view on the [Oldham Council website](#).

2. Context

- 2.1. This section sets out the key national planning policies that relate to addressing climate change and which have informed the policy approach taken. It also looks at the regional context – in the main this is the Places for Everyone Joint Development Plan, however there may be other policies and programmes of relevance, and local policies and programmes, in particular how the policy or policies will help to Create a Better Place.

¹ Available at: https://www.oldham.gov.uk/info/201233/local_plan_review/3095/draft_local_plan

National

National Planning Policy Framework (Department for Levelling Up, Housing and Communities, December 2023)

- 2.2. [National Planning Policy Framework](#)² (NPPF) states the planning system, should support a transition to a low carbon future in a changing climate, taking full account of flood risk. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, encourage the reuse of existing resources and support renewable and low carbon energy and associated infrastructure.

Planning for Climate Change

- 2.3. NPPF requires plans to take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, water supply, biodiversity and landscapes and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.
- 2.4. New development should be planned for in ways that:
- a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
 - b) help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.
- 2.5. To help increase the use and supply of renewable and low carbon energy and heat, plans should:
- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and their future re-powering and life extension, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts);
 - b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and
 - c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

² NPPF can be found at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Planning and Flood Risk

- 2.6. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, then development should be made safe for its lifetime without increasing flood risk elsewhere.
- 2.7. Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as Lead Local Flood Authorities (LLFA) and internal drainage boards.
- 2.8. All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:
 - a) applying the sequential test and then, if necessary, the exception test as set out below;
 - b) safeguarding land from development that is required, or likely to be required, for current or future flood management;
 - c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and
 - d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.
- 2.9. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.
- 2.10. If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3 of NPPF.
- 2.11. The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that:

- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
 - b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
- 2.12 Both elements of the exception test should be satisfied for development to be allocated or permitted.
- 2.13 Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:
- a) take account of advice from the LLFA;
 - b) have appropriate proposed minimum operational standards;
 - c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
 - d) where possible, provide multifunctional benefits.

Planning Practice Guidance ((Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government)

- 2.14 The [planning practice guidance](#)³ (PPG) includes detailed advice on climate change (March 2019), renewable and low carbon energy (August 2023) and flood risk (August 2022). A summary of some of the key points is shown below:

Climate Change

- 2.15 The guidance highlights that it is important to consider climate change as it can influence the emission of greenhouse gases. LPAs should ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment. Planning can also help increase resilience to climate change impact through the location, mix and design of development.
- 2.16 Addressing climate change is a key principle of NPPF and this will be reflected in whether the Local Plan is 'sound'. The Climate Change Act 2008 and the Planning and Compulsory Purchase Act set out a statutory duty on LPAs to include policies in their Local Plan designed to tackle climate change and its impacts. NPPF emphasises that responding to climate change is central to the economic, social and environmental dimensions of sustainable development.
- 2.17 Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 requires LPAs to include in their Local Plans "policies designed to secure that the development and use of land in the LPAs area contribute to the mitigation of, and adaptation to, climate change".

³ Planning Practice Guidance can be found at: <https://www.gov.uk/government/collections/planning-practice-guidance>

- 2.18 The Climate Change Act 2008 establishes a legally binding target to reduce the UK's greenhouse gas emissions by at least 80% in 2050 from 1990 levels.
- 2.19 The guidance provides examples of how the Local Plan might mitigate and adapt to climate change:
- Reducing the need to travel and providing for sustainable transport;
 - Providing opportunities for renewable and low carbon energy;
 - Providing opportunities for decentralised energy and heating; and
 - Promoting low carbon design approaches to reduce energy consumption in buildings, such as passive solar design.
- 2.20 Examples of adapting to a changing climate include:
- Considering future climate risks when allocating development sites to ensure risks are understood over the development's lifetime.
 - Considering the impact of and promoting design responses to flood risk for the lifetime of the development.
 - Considering availability of water and water infrastructure for the lifetime of the development and design responses to promote water efficiency and protect water quality.
 - Promoting adaptation approaches in design policies for developments and the public realm.
- 2.21 Engaging with relevant stakeholders will identify how the Local Plan can respond to climate change.
- 2.22 LPAs should pay particular attention to integrating adaptation and mitigation approaches and looking for 'win-win' solutions that will support sustainable development. This could be achieved in a variety of ways, for example:
- by maximising summer cooling through natural ventilation in buildings and avoiding solar gain;
 - through district heating networks that include tri-generation (combined cooling, heat and power); or
 - through the provision of multi-functional green infrastructure, which can reduce urban heat islands, manage flooding and help species adapt to climate change – as well as contributing to a pleasant environment which encourages people to walk and cycle.
- 2.23 The impact of climate change needs to be taken into account in a realistic way. In doing so, LPAs will want to consider:
- identifying no or low-cost responses to climate risks that also deliver other benefits, such as green infrastructure that improves adaptation, biodiversity and amenity;
 - building in flexibility to allow future adaptation if it is needed, such as setting back new development from rivers so that it does not make it harder to improve flood defences in future; and

- the potential vulnerability of a development to climate change risk over its whole lifetime.
- 2.24 In terms of evidence the guidance outlines that Climate Change risk assessments can help inform the Local Plan and Sustainability Appraisal.
- 2.25 Local risk assessments can be used to identify those climate risks, including those arising from severe weather events, the planning system can address. Risk assessments could consider the implications for the built environment and development, infrastructure, services and biodiversity, and their subsequent implications for vulnerable groups and community cohesion. Identifying those impacts which pose most potential risk or disruption to the provision of local services will enable vulnerability to be assessed and areas suitable for development to be identified and adaptation responses to be put in place.
- 2.26 Other parts of a Local Plan's evidence base will also include information on climate change risks, such as the Strategic Flood Risk Assessment and Water Resource Management Plan and water cycle studies. Infrastructure providers hold information on the extent of supply and network constraints and their existing plans to reinforce those networks and capacity. Other service providers may also have carried out risk assessments that have implications for planning, such as health and social service providers.
- 2.27 In terms of energy where energy efficiency improvements require planning permission LPAs should ensure any advice to developers is co-ordinated to ensure consistency between energy, design and heritage matters.

Renewable and low carbon energy

- 2.28 Increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses. Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable.
- 2.29 When drawing up a Local Plan LPAs should first consider what the local potential is for renewable and low carbon energy generation. In considering that potential, the matters LPAs should think about include:
- the range of technologies that could be accommodated and the policies needed to encourage their development in the right places;
 - the costs of many renewable energy technologies are falling, potentially increasing their attractiveness and the number of proposals;
 - different technologies have different impacts and impacts can vary by place; and
 - the UK has legal commitments to cut greenhouse gases and meet increased energy demand from renewable sources. Whilst local authorities should design their policies to maximise renewable and low carbon energy development, there is no quota which the Local Plan has to deliver.

- 2.30 There are no rules about how suitable areas for renewable energy should be identified, but in considering locations, LPAs will need to ensure they take into account the requirements of the technology and, critically, the potential impacts on the local environment, including from cumulative impacts. The views of local communities likely to be affected should be listened to.
- 2.31 In the case of wind turbines, a planning application should not be approved unless the proposed development site is an area identified as suitable for wind energy development in a Local or Neighbourhood Plan. Maps showing the wind resource as favourable to wind turbines or similar will not be sufficient.
- 2.32 Policies based on clear criteria can be useful when they are expressed positively (i.e. that proposals will be accepted where the impact is or can be made acceptable).
- 2.33 The guidance sets out detail on the issues that need to be considered for each type of technology.

Flood Risk

- 2.34 The guidance states that NPPF sets out strict tests to protect people and property from flooding which all LPAs are expected to follow. Where these tests are not met, new development should not be allowed. The main steps to be followed in addressing flood risk are set out below, starting with assessing and then avoiding flood risk. The steps are designed to ensure that if there are lower risk sites available, or a proposed development cannot be made safe throughout its lifetime without increasing flood risk elsewhere, it should not be permitted. Measures to avoid, control, manage and mitigate flood risk should also not increase flood risk elsewhere.
- 2.35 Local Plans should be supported by a Strategic Flood Risk Assessment (SFRA).

Regional

Places for Everyone (Greater Manchester Combined Authority (GMCA), September 2023)

- 2.36 The [Places for Everyone](#)⁴ (PfE) Joint Development Plan Document (DPD), is a strategic plan that will, upon adoption, cover nine of the ten Greater Manchester districts - Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan. The Plan:
- Provides the strategic framework for the Oldham Local Plan;
 - Sets out specific requirements to be taken forward through the Oldham Local Plan in relation to housing, offices, and industry and warehousing, and identifies the main areas where this will be focused;
 - Identifies the important environmental assets which will be protected and enhanced;

⁴ Places for Everyone can be found at: <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/>

- Allocates sites for employment and housing outside of the urban area – in Oldham this is JPA2 Stakehill, JPA12 Beal Valley, JPA13 Bottom Field Farm, JPA14 Broadbent Moss, JPA15 Chew Brook Vale, JPA16 Cowlshaw, JPA17 Land south of Coal Pit Lane' and JPA18 South of Rosary Road;
 - Supports the delivery of key infrastructure, such as transport and utilities; and
 - Defines a new Green Belt boundary for the borough.
- 2.37 Upon adoption PfE will form part of the development plan for Oldham. PfE will set the strategic policies and direction for the borough. Oldham's Local Plan interprets these at a more detailed local level to reflect our priorities and support delivery of the council's regeneration ambitions and Creating a Better Place.
- 2.38 When considering development proposals and what needs to be taken account of in the determination of planning applications regard must therefore be had to both PfE and Oldham's Local Plan.
- 2.39 The most relevant PfE policies relating to addressing climate change are outlined below. However, please see the PfE plan for full policy wording:
- 2.40 **Policy JP-S1 Sustainable Development** states development should aim to maximise its economic, social and environmental benefits simultaneously, minimise its adverse impacts, utilise sustainable construction techniques and actively seek opportunities to secure net gains across each of the different objectives.
- 2.41 **Policy JP-S2 Carbon and Energy** seeks to deliver a carbon neutral Greater Manchester no later than 2038, with a dramatic reduction in greenhouse gas emissions. Measures to achieve this include:
1. Promoting the retrofitting of existing buildings with measures to improve energy efficiency and generate renewable and low carbon energy, heating and cooling;
 2. Promoting the use of life cycle cost and carbon assessment tools to ensure the long-term impacts from development can be captured;
 3. Taking a positive approach to renewable and low carbon energy schemes, particularly schemes that are led by, or meet the needs of local communities;
 4. Increasing the range of nature-based solutions including carbon sequestration through the restoration of peat-based habitats, woodland management, tree-planting and natural flood management techniques;
 5. An expectation that new development will, unless it can be demonstrated that it is not practicable or financially viable be:
 - a. Net zero carbon (further detail on this criterion is included in the policy)
 - b. Incorporate adequate electric vehicle charging points, in line with Part S of the Building Regulations, unless superseded by relevant Local Plan policies, to future proof for the likely long-term demand, taking account of the potential maximum energy demand for the site;
 6. Where practicable, prioritise connection to a renewable energy/heating/cooling network in the first instance or a low carbon energy/heating/cooling network that is adaptable to non-fossil fuels at a later date; and

7. In residential developments, achieve energy demand reductions in terms of space heat demand; hot water energy demand and the delivery of on-site renewable energy generation, in accordance with Table 5.1 (see PfE).

For renewable energy generation priority should be given to PV installation where technically feasible, alternative technologies will be appropriate where the equivalent generation is evidenced.

For non-residential developments, achieve at least BREEAM excellent standard (or equivalent) for the 'Ene 01 – reduction of energy use and carbon emissions' category rising to 'BREEAM outstanding' equivalent for ENE 01 from 2028.

2.42 **Policy JP-S3: Heat and Energy Networks** sets out that delivery of renewable and low carbon energy schemes will be supported with particular emphasis on the use of decentralised energy networks in areas identified as “Heat and Energy Network Opportunity Areas”. Within the identified “Heat and Energy Network Opportunity Areas”, unless it can be demonstrated that there are more effective alternatives for minimising carbon emissions or such connection is not practicable or financially viable, it is expected that new residential developments over 10 dwellings or other developments over 1,000 m² floorspace shall connect to an existing or planned heat/energy network or be designed to enable future connection (where within 500m of such a network); and/or install a site-wide or communal heat/energy network solution. More detail is included within this policy on heat networks.

2.43 **Policy JP-S5: Flood Risk and the Water Environment** states an integrated catchment-based approach will be taken to protect the quantity and quality of water bodies with reference to the Northwest River Basin Management Plan and managing flood risk, by:

1. Returning rivers to a more natural state, where practicable;
2. Working with natural processes and adopting a natural flood management approach to slow the speed of water drainage and intercept water pollutants;
3. Locating and designing development so as to minimise the impacts of current and future flood risk, including retrofitting or relocating existing developments, infrastructure and places to increase resilience to flooding;
4. Expecting developments to manage surface water runoff through sustainable drainage systems and as close to source as possible. Development should aim to achieve greenfield run-off rates unless it is demonstrated to be impracticable. District Local Plans should consider setting more detailed surface water drainage policies to reflect local circumstances, including alternative surface water discharge rates, such as in areas with critical drainage issues;
5. Ensuring that sustainable drainage systems:
 - i. Are designed to provide multifunctional benefits wherever possible, including for water quality, nature conservation and recreation;
 - ii. Avoid adverse impacts on water quality and any possibility of discharging hazardous substances to ground;
 - iii. Are delivered in a holistic and integrated manner, including on larger sites split into different phases; and

- iv. Are managed and maintained appropriately to ensure their proper functioning over the lifetime of the development.
 - 6. Securing the remediation of contaminated land and the careful design of developments to minimise the potential for urban diffuse pollution to affect the water environment;
 - 7. As a minimum, residential development should meet the mandatory water efficiency standard of 125 litres/person/day as set out in Building Regulations. District Local Plans may and should consider setting a tighter water efficiency standard of 110 litres/person/day where there is a clear local need with reference to national guidance on housing optional technical standards.
- 2.44 **Policy JP-S7: Resource Efficiency** encourages using sustainable design and construction techniques to reduce carbon emissions, adapt and future proof to the impact of climate change, reduce and recycle waste and minimise water use.
- 2.45 **Policy JP-P1 Sustainable Places** states we aim to become one of the most liveable city regions in the world that is resource-efficient with a) low carbon footprint; b) Efficient use of land; c) Minimised use of new materials; and d) High levels of recycling.
- 2.46 There are also a several PfE policies addressing Green Infrastructure which relate to climate change providing benefits such as carbon storage and flood risk mitigation and Policy JP-S6 Clean Air.

Local

The Oldham Plan (Oldham Partnership, 2023)

- 2.47 The Oldham Plan '[Our Future Oldham - A shared vision for 2030](#)'⁵ (Oldham Partnership, 2023) prepared by the Oldham Partnership, sets the direction for the borough. With a focus on 'residents first', the Plan seeks to ensure that residents are at the heart of decision-making.
- 2.48 Consultation carried out to inform preparation of The Oldham Plan found that residents want services close to home and tailored to meet the specific needs of their community. The contributions emphasise a desire for Oldham to be a clean, green and safe place where public transport allows access to opportunities, activities for young people and communities and where people felt part of the city region.
- 2.49 The main aim of the Oldham Partnership, through the Plan, is to 'uplift every resident', so that we all have:
- A well-rounded, enriching, life-long education
 - The opportunity to get a decent job that pays well and offers security and flexibility
 - Quick, cheap and easy transport to every part of the city region
 - A home that is affordable, well-maintained and appropriate
 - Timely access to vital services to keep people healthy and safe

⁵ The Oldham Plan can be found at:

https://www.oldham.gov.uk/downloads/file/7589/the_oldham_plan_-_our_future_oldham

- A clean, green and healthy environment
- Diverse opportunities to get together, with regular activities to boost physical and mental health and community spirit
- A local area that meets people's needs and makes them proud

Oldham Council Corporate Plan (Oldham Council, 2022)

2.50 The Oldham Council [Corporate Plan 2022-27](#)⁶ sets out the council's priorities, with specific actions for 2022-25. It works in parallel with The Oldham Plan and sets out what its priorities mean for Oldham:

- Healthy, safe and well supported residents
- A great start and skills for life
- Better jobs and dynamic businesses
- Quality homes for everyone
- A clean and green future

2.51 Delivering against these priorities means that the council can help residents and make Oldham the best place it can be.

2.52 The Corporate Plan specifically references the Green New Deal targets to make the council carbon-neutral by 2025 and the borough carbon-neutral by 2030. This is important for the borough as a way of making Oldham a more pleasant and healthier place to live in the short term, while protecting the borough and planet from the worst effects of climate change in the long term.

Creating a Better Place

2.53 The Local Plan represents the spatial expression of The Oldham Plan and the council's Corporate Plan. Their aspirations and priorities are the golden thread that runs through the Plan, along with supporting and facilitating the delivery of the council's ambitious Creating a Better Place agenda which is embedded into the planning framework provided through the policies as illustrated in Figure 1 below.

2.54 Figure 1: Flow diagram illustrating how the council's Creating a Better Place agenda has been embedded into the planning framework.

⁶ The Corporate Plan can be found at:
https://www.oldham.gov.uk/downloads/file/7405/oldham_corporate_plan_2022-27



- 2.55 Through delivering Oldham Council's bold vision for Oldham Town Centre and the wider borough and the ambitions of Creating a Better Place by 2030 Oldham will be a place where business and enterprise can thrive and where people will want to live, visit, relax and work.
- 2.56 Building on its industrial heritage, civic pride and location as a gateway into the countryside, Oldham will have a sustainable future in a unique urban setting. Oldham will be a stronger economic contributor to Greater Manchester, providing a place where every resident is enabled to contribute to and benefit from the continued growth of the city region.
- 2.57 Underneath the overarching theme of Creating a Better Place there sits several key issues that policies within the Local Plan seek to address such as the creation of healthy communities and tackling the climate emergency.
- 2.58 The policies set out within the Local Plan also provide a robust framework for ensuring that all development proposals mitigate the impact of climate change, make their contribution to meeting nationally binding targets to reduce greenhouse emissions and increase resilience. Policies relating to addressing climate change will:
- Ensure that development is located in a way that takes account of flood risk and that it is designed in such a way as to increase water efficiency, reduce demand on water resources and protect water quality.
 - Encourage the use of decentralised, renewable and low carbon energy in new developments and that through their construction, design and layout they minimise energy consumption.

- Use the benefits from Green Infrastructure creation, enhancement and protection to underpin our response to climate change and carbon reduction whilst providing connected and resilient networks.

Oldham Green New Deal (Oldham Council, 2020)

- 2.59 In July 2019 the council announced a climate emergency and committed to becoming carbon neutral as an organisation by 2025, and to becoming the UK's first "Green New Deal Council", setting a target of 2030 for carbon neutrality for the borough as a whole. In recognising the huge opportunity in tackling the climate emergency the Green New Deal Strategy sets in place a framework to achieve the above targets whilst working with residents and partners to make Oldham an even greener, smarter, more enterprising place.
- 2.60 The vision is to "Make Oldham a greener, smarter, more enterprising place".
- 2.61 The objectives include:
- Make Oldham a leading local authority area for environmental quality and play a leading role in meeting the Greater Manchester Mayor's Green City Region Objectives.
 - Deliver a sustainable economy, tackling fuel poverty and generating training and employment opportunities in the growing green business sector.
 - Maintain a high-quality local environment which delivers health and well-being for residents, including food and recreation, reducing costs for public services.
 - Generate inbound tourism for the borough by building on Oldham's reputation for being a green, attractive, and forward-thinking sustainable borough.
 - Keep Oldham at the forefront of development and deployment of cutting-edge environmental technologies and ensure that the benefits are kept locally.
 - Future-proof the regeneration of the borough by establishing Oldham as an exemplar Green City on energy, carbon, water and green infrastructure.
- 2.62 The strategic aim is to meet our environmental targets whilst maximising the benefit of this action to develop Oldham's green economy. The three pillars of the strategy are:
1. Green Economy, including work, skills and business engagement;
 2. Low Carbon (physical infrastructure); and
 3. Northern Roots (the 160-acre eco-park at Snipe Clough and its attendant brand and initiatives, and the state of the art zero-carbon Eco-Centre at Alexandra Park).
- 2.63 The Low Carbon theme of this strategy focuses on the generation, distribution and use of energy in the council and wider public sector, businesses, homes and community buildings across the borough, as well as transport.
- 2.64 Through a Local Energy Market Oldham can help to put energy generation and use back in the hands of citizens, creating more self-reliant and empowered communities in charge of their own resources.
- 2.65 The council will seek to enable delivery of these cutting-edge technologies in Oldham for the benefit of residents, businesses and to ensure that Oldham is seen as a home and destination for business and education opportunities which realise the value of

these new technologies, and to continue to secure associated external funding for projects in Oldham.

- 2.66 This Strategy proposes the development of a Local Energy Market, encompassing and catalysing several key components and outcomes:
- building renewable energy generation, including public and community owned schemes;
 - developing low carbon housing, including enabling the transition to electrical heating systems;
 - supporting the transition to electric transport;
 - enabling the redevelopment of Oldham Town Centre as a zero-carbon regeneration scheme;
 - the creation of a council-led Oldham Virtual Energy Company to accelerate the finance, installation and operation of renewable energy and Nature Based Solutions; and
 - tackling fuel poverty with innovative approaches such as special tariffs for residents on pre-payment meters and generating funds for energy efficiency retrofit measures in fuel poor homes.

3 Consultation Feedback

Regulation 18 Notification Consultation

- 3.13 To begin preparation of the Local Plan the council carried out a Regulation 18 Notification between July and August 2017.
- 3.14 To inform this work we asked what the local community and stakeholders thought:
- a) the Local Plan should contain and what the key planning issues are for Oldham; and
 - b) what, in broad terms, should be the main aims of the Local Plan.
- 3.15 In addition, we published our Integrated Assessment Scoping Report and invited the Environment Agency, Historic England and Natural England to comment on the scope of the Local Plan. This was also available for the local community and stakeholders to view and comment on if they wished.
- 3.16 The main messages that came out of the Regulation 18 Notification consultation regarding addressing climate change were:
- Development should not take place in areas prone to flooding.
 - Water storage should take place in the uplands.
 - Sustainable drainage encouraged.
 - Need to consider Groundwater Source Protection Zones.
 - High energy efficiency and renewable energy sources should be imposed on new developments. Affordable warmth is important.
 - Support for larger renewable / low carbon energy schemes.
 - There is poor air quality.

Regulation 18 Issues and Options Consultation

- 3.17 The Oldham Local Plan: Issues and Options consultation in 2021 identified climate change as one of the key themes for the new Local Plan to address.
- 3.18 The consultation identified the above key issues in the Issues and Options document.
- 3.19 As part of the consultation, we asked you:

Renewable Energy and Low Carbon Energy Questions

1. Do you think the best way for the Local Plan to assist in carbon neutrality is to map opportunities for renewable and low carbon energy, including heat networks?
2. Should the Local Plan set a preference for modern methods of construction in housing developments where suitable and possible in order to encourage more sustainable and efficient construction styles?

Flood Risk Questions

1. Which discharge rate for managing surface water should the Local Plan use?
 - a) National guidelines to not worsen drainage and if possible improve;
 - b) Existing standards which are referenced in the Greater Manchester SFRA.

These are:

- greenfield runoff on greenfield sites up to 1 in 100 year storm event, considering climate change;
- a reduction in surface water runoff rates of at least 30% for brownfield sites up to 1 in a 100 year storm event, considering climate change;
- a reduction in surface water runoff rates of at least 50% for brownfield sites within a Critical Drainage Area, with an aim of reducing runoff to greenfield rates up to a 1 in 100 year storm event, considering climate change; and
- development must be designed so there is no flooding to the development in a 1 in 30 year event and so that there is no property flooding in a 1 in a 100 year plus climate change event.

c) An alternative option. Please submit suggestions.

2. Do you think that the existing approach of all planning applications over 0.5 hectares within a critical drainage area should continue to be required to submit a Flood Risk Assessment?
 3. Should Oldham have a policy that requires all development to incorporate SUDS, unless demonstrated to be unfeasible?
 4. Do you agree with using natural processes as a way to mitigate flood risk?
- 3.20 We have reviewed the responses you gave us, and you will find the issues raised in relation to addressing climate change summarised in this topic paper below.

4 Addressing Climate Change and the Draft Local Plan

- 4.1 Key policy areas have been identified that are addressed in this topic paper. For each of these, further detail is provided on how comments received to the Issues and Options consultation and relevant evidence have helped to shape the proposed policy approach and how this has also been informed by the findings of the Integrated Assessment. There are also details of further work that may be required to inform the next stage of the plan-making process – the Regulation 19 Publication Plan.

Policy CC1 Sustainable Construction, Energy Efficiency and Retrofitting and Policy CC2 Renewable & Low Carbon Energy

Feedback from Issues and Options consultation

- 4.2 The consultation responses are summarised in the 'Issues and Options Comments and Response Schedule'. In relation to the above policy areas relevant feedback included:
- Support for climate change policy to be intrinsically linked to wider policies in the plan including those related to design of new development and the provision of green and blue infrastructure.
 - Suggestion that the chapter could make reference to GMs Environment Plan targets.
 - Support for Modern Methods of Construction (MMC) and mapping out opportunities for renewable and low carbon energy though some respondents consider a policy is unnecessary. Historic England noted distinction between historic and modern fabric.

Issues to be addressed

- 4.3 Issues to be addressed on climate change were summarised in the Climate Change topic paper at Issues and Options stage. Relevant to the above policies these included:
- There is the need to support Greater Manchester's and Oldham's climate change objectives to be carbon neutral.
 - There is a need to identify a positive strategy to ensure that growth is matched with secure, affordable and sustainable energy. There is a need for positive policies for energy that encourage the development of commercial and community-lead energy schemes.
 - There is the need to consider whether to identify suitable areas for renewable and low carbon energy sources and areas where heat networks could be appropriate. A positive approach should also consider the location, mix and design of development and follow the energy hierarchy.
 - There is a need to encourage modern methods of construction.

- 4.4 The Scoping Report has since been updated (Update 2) and identifies the issues to address include:
- reduce energy use, promote energy efficiency, and promote renewable and low carbon energy.

Evidence Base

- 4.5 Mitigating climate change is one of the five challenges outlined in the Greater Manchester [Five-Year Environment Plan](#)⁷. It sets out an aim for our city region to be carbon neutral by 2038 and meet carbon budgets that comply with international commitments.
- 4.6 The council's Creating a Better Place reflects Oldham's commitment to climate change and seeks to ensure a greener borough by embedding sustainability, energy efficiency & low (zero) carbon. In June 2019, Oldham Council declared its ambition to be the UK's first Green New Deal Council. It subsequently declared a Climate Emergency in September 2019.
- 4.7 The council's [Oldham Green New Deal Strategy](#)⁸ was adopted by the council in March 2020. The Strategy's objective is to 'Future-proof the regeneration of the borough by establishing Oldham as an exemplar Green City on energy, carbon, water and green infrastructure'.
- 4.8 The Strategy sets two challenging targets for carbon neutrality – 2025 for the council (council buildings and street lighting), and 2030 for the borough (through renewable energy generation, off set measures such as tree planting, developing a Local Energy Market, low carbon heat networks) and puts in place a framework to work with our residents and partners to make Oldham an even greener, smarter, more enterprising place.
- 4.9 The [Oldham Local Area Energy Plan](#)⁹ (LAEP) identifies opportunities for low carbon energy including solar, hydrogen, heat pumps, electric vehicle charging and a district heat network.
- 4.10 The LAEP identifies:
- twenty-six potential sites for ground mounted solar covering a total of up to 554 hectares;
 - potential for a single 60 kilowatt hydro site on the River Tame, running through Uppermill. There may be other opportunities within the borough.

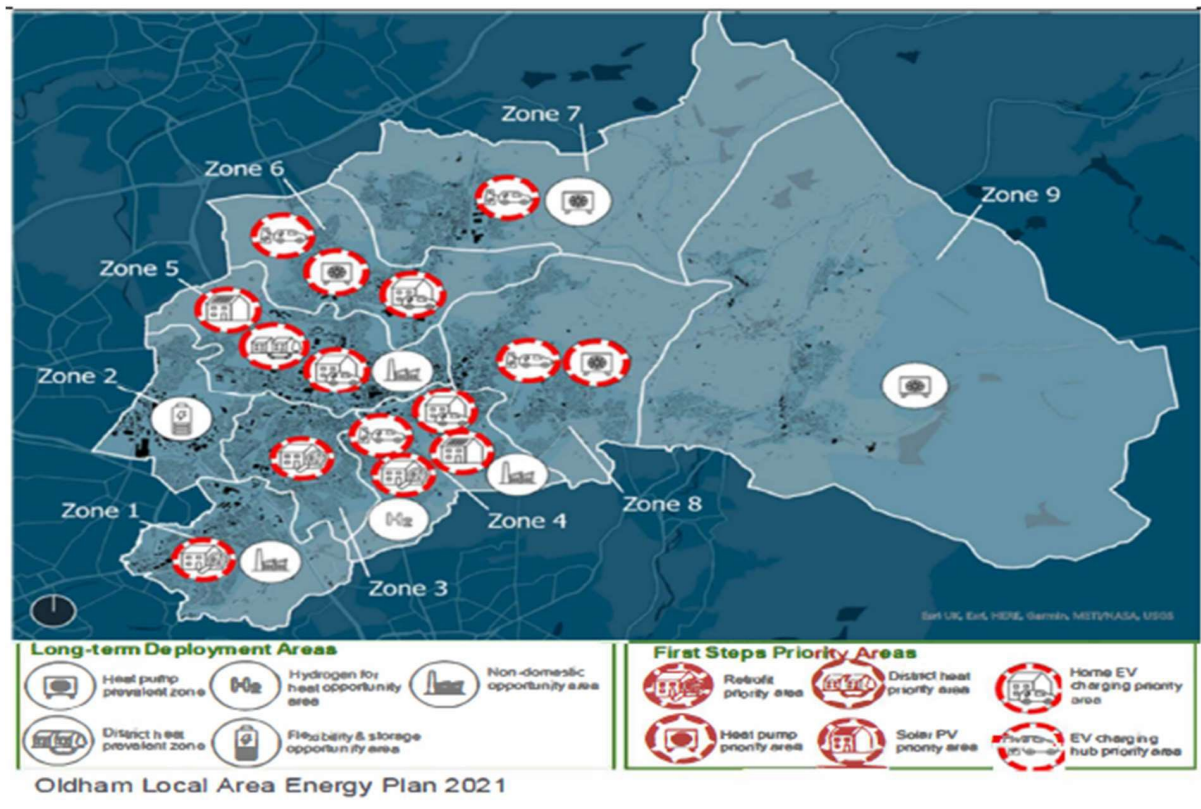
⁷ The five-year environment plan can be found at: <https://www.greatermanchester-ca.gov.uk/what-we-do/environment/five-year-environment-plan/>

⁸ The Green New Deal Strategy can be found at: <https://www.oldham.gov.uk/gnds>

⁹ The Local Area Energy Plan can be found at: https://committees.oldham.gov.uk/documents/s129736/OS%20Feb%2022%20-%20OGND%20Appx%20C_Oldham%20LAEP.pdf

4.11 Figure CC1 shows the local priorities and measures to achieving decarbonisation, taken from the LAEP.

Figure CC1: Oldham Local Area Energy Plan Local Priorities and Measures

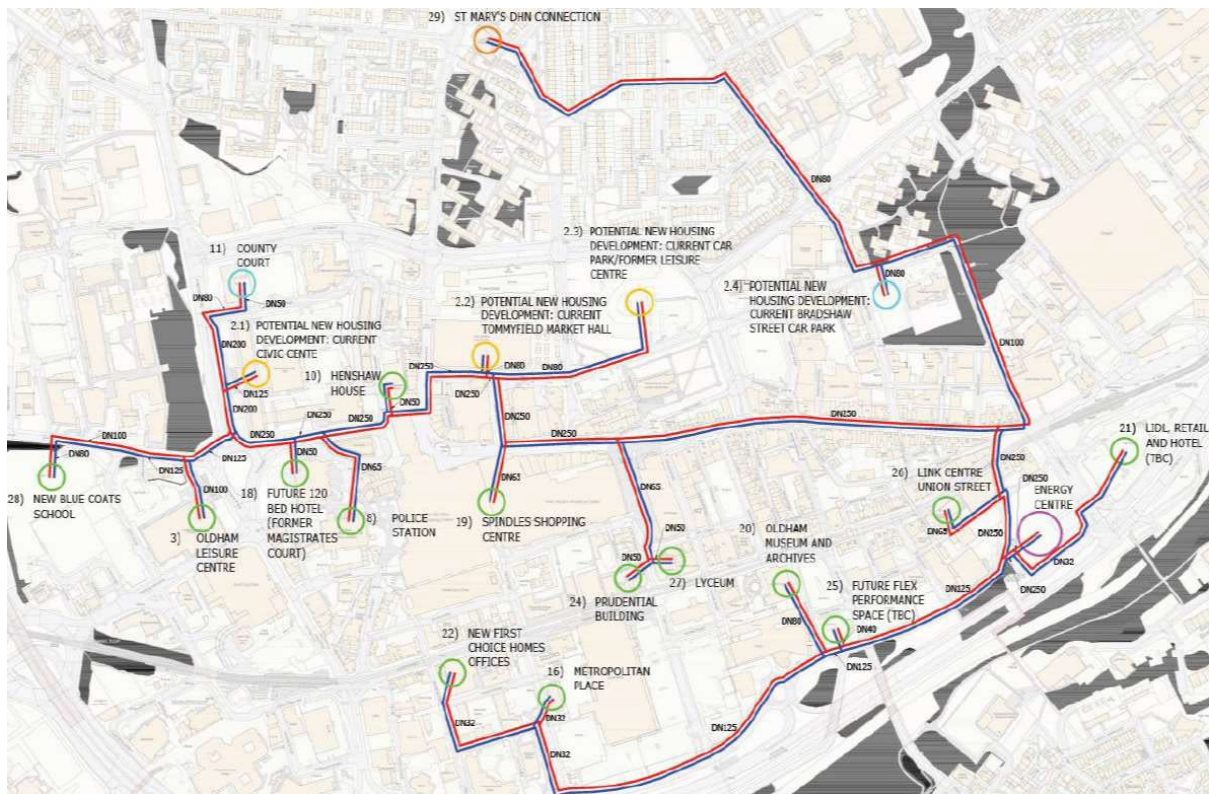


4.12 The LAEP highlights the importance of heat networks which will need to grow and expand, particularly around existing heat networks. An existing heat network (St Marys’) is identified as providing the starting point to grow the coverage of district heating. St Mary’s Heat Network was constructed during the 1960s and currently provides heat to 1416 First Choice Homes (FCHO) properties and Oldham’s town leisure centre.

4.13 The Oldham Mine Water Heat Network is a pioneering project which would use heat reclaimed from flood water in disused coal mines to heat buildings across Oldham Town Centre. Feasibility work carried out by the Coal Authority, on behalf of the council, indicates potential to extract around 4MW of heat from Oldham’s mine water, which would make it one of the largest schemes in the UK. A first stage feasibility on the potential mine water heat network was completed in spring 2021. The council has been awarded grant funding from the Department for Business, Energy and Industrial Strategy (BEIS) to support the next stage of feasibility work – i.e., a wide-scale district heat network combining the existing St Mary’s heat network with a new heat network serving large town centre buildings/development sites.

4.14 The Oldham Mine Water Heat Network project can be seen in Figure CC2 below.

Figure CC2: Oldham Mine Water Heat Network



Wind Energy

- 4.15 National planning policy (footnote 58) states that proposals for wind energy development should not be considered acceptable unless it is in an area identified as suitable for wind energy development in a development plan or a supplementary planning document (SPD) (wind turbines can also be permitted through Local Development Orders, Neighbourhood Development Orders and Community Right to Build Orders) and following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been appropriately addressed and the proposal has community support.
- 4.16 At this stage site specific sites have not been identified for wind energy however the policy lays out constraints that need to be considered. As such, the Local Plan area is considered an area of search, except for within 400m of the South Pennine Moors SAC/ SPA due to Places for Everyone (PfE) Policy JP-G5 Uplands. The council may prepare a supplementary plan in the future which identifies refined areas of search or look at further evidence for the Publication Plan stage.

Proposed Policy Approach and Reasons

Policy CC1 - Sustainable Construction, Energy Efficiency and Retrofitting

- 4.17 The policy encourages developments to achieve high standards of sustainable design and construction in order to mitigate the effects of climate change and to realise the council's ambition of achieving carbon neutrality by 2030. Criteria is set that development should follow in relation to:
- reducing the energy load of development;
 - minimising the use of resources;
 - using sustainably sources and recycled materials; and
 - incorporating soft landscaping
- 4.18 Modern Methods of Construction is encouraged where appropriate and sensitive retrofitting of heritage assets is encouraged.
- 4.19 The policy requires Energy Statements to be submitted alongside planning applications.
- 4.20 The Policy should be read alongside PfE policies JP-S2 and JP-S7. The policy aims to add further Local Plan detail to ensure that developments are sustainably constructed.
- 4.21 The policy has been informed by Historic England's feedback at the Regulation 18 Notification stage regarding energy efficiency and heritage assets. This approach still allows for modern methods of construction to be encouraged where appropriate which respondents such as United Utilities (UU) were supportive of. First Choice Homes requested that the policy should encourage rather than make such an approach a requirement and this recommendation was incorporated. This should also address the Home Builders federation representation which stated that stating a preference is unnecessary.

Policy CC2 Renewable & Low Carbon Energy

- 4.22 The policy sets out that proposals for renewable and low carbon energy development, including wind energy, will be supported where any adverse impacts have been satisfactorily addressed having regard to impacts on:
1. Local amenity, including noise, air quality, traffic, vibration, dust and visual impact, light (including reflection, glint, glare and shadow flicker);
 2. Highway safety and network capacity;
 3. Biodiversity, geodiversity, nature conservation designations, habitats and species, particularly in relation to displacement, disturbance, and the impact emissions;
 4. The openness of the Green Belt and whether very special circumstances have been demonstrated to justify otherwise inappropriate development;
 5. Loss of open space;

6. The significance of Local Green Space;
 7. Flood Risk, hydrology and water supply;
 8. Land stability, contamination, and loss high quality soil and agricultural land;
 9. Public rights of way including access tracks and recreational routes;
 10. Telecommunications and other networks, including operational equipment required to connect to the National Grid, electromagnetic production and interference and aeronautical impacts such as radar systems;
 11. The qualities and sensitivities of key landscape characteristics and townscapes;
 12. The historic environment including heritage assets and their settings;
 13. Mineral Safeguarding Areas; and
 14. Cumulative effects with other existing and proposed energy developments.
- 4.23 The policy also requires a landscape Impact Assessment where the development may have a landscape impact.
- 4.24 The policy states that proposals for wind energy can be considered across the borough, except within 400m of the South Pennines Moors SAC /SPA. A refined area of search for wind energy may be identified in a supplementary plan.
- 4.25 The policy also includes detail on decommissioning and community led schemes.
- 4.26 This policy approach sets out the factors that council will consider so that applicants can prepared a well-informed planning application in accordance with national policy paragraph 160.
- 4.27 Setting out the criteria that will be considered when assessing proposals for renewable and low carbon energy will help to ensure there are no adverse impacts. The council has stated that wind turbines should not be within 400m of the SAC/SPA. This buffer has been applied consistent with PfE JP-G5 'Uplands' which seeks to avoid new development within 400 m of the South Pennines SAC/SPA, which has been informed by the HRA prepared for PfE.
- 4.28 Furthermore, the policy provides a policy hook for areas of search to be refined through a supplementary planning document in line with national policy (NPPF footnote 58).

Integrated Assessment

- 4.29 Policy CC1 scored positively or neutral. No mitigation or enhancements to the policy were required as a result of the IA process. The policy was not screened in by the HRA.
- 4.30 Policy CC2 mostly scored positively or neutral. Three potentially negative scores were given against IA2 (open space), IA11 (soil) and IA24 (minerals) as these were not fully referenced within the policy at the time of undertaking the IA. To mitigate this the policy was amended by making references to the loss of open space, loss of high-quality soil and agricultural land and to Minerals Safeguarding Areas. This further strengthens the policy.
- 4.31 The policy was not screened in by the HRA.

Policy CC3 Managing Flood Risk and Policy CC4 Sustainable Drainage – Foul and Surface Water

Feedback from Issues and Options consultation

4.32 The main feedback at Issues and Options stage with regards to the above policies was:

- Support for policies managing surface water runoff which accord with either national standards or standards referenced in the Greater Manchester SFRA.
- Support for SUDs and using natural processes to mitigate flood risk.
- Request for the importance of Moors for the Future to be acknowledged in terms of reducing flood risk (this has been incorporated into the spatial portrait).
- Encourage liaising with the LLFA.
- The Environment Agency recommend proposed development is within flood zone 1.
- United Utilities (UU) sent recommended policy for the management of surface water and recommend a SUDS policy.
- UU support submission of a flood risk assessment for sites over 0.5 hectares within critical drainage areas (CDAs).

4.33 For the full breakdown of comments please see the 'Issues and Options Comments and Response Schedule'.

Issues to be addressed

4.34 Issues to be addressed on climate change were summarised in the Climate Change topic paper at Issues and Options stage. Relevant to the above policies these included:

- There is a need to take a natural capital approach to combating climate change through measures such as the use of green infrastructure and allowing for adaptation, for example through setting back new development from rivers.
- There is a need to use the opportunity mapping to identify appropriate measures to achieve integrated water management.
- There is a need to support natural flood management solutions, such as new tree planting under schemes such as City of Trees and Slow the Flow initiatives and water storage in the uplands.
- There is the need to incorporate green and blue infrastructure into new developments.
- There is a need to reduce and manage flood risk from all sources, taking into account the cumulative impacts on areas susceptible to flooding and climate change.
- There is the need to ensure that new and critical infrastructure is located (or relocated where opportunities arise) away from areas of flood risk.
- There is a need to determine appropriate drainage standards.
- There is the need to promote the use of SUDS that offer multi-functional benefits, which are maintained throughout the lifetime of SUDS.

- 4.35 The Scoping Report has since been updated (Update 2) and identifies the issues to be addressed include the need to:
- avoid and mitigate against flood risk; and
 - adapt and be resilient to climate change

Evidence Base

- 4.36 National planning policy and its practice guidance sets out clear tests for assessing planning applications to ensure that development is focussed on sites with lower flood risk probability and that they can be made safe.
- 4.37 The policy is also justified by the Greater Manchester Strategic Flood Risk Assessment (SFRA) which was prepared to support PfE and has been used to support the Local Plan review. A [Management Framework](#)¹⁰ was also prepared as part of this.
- 4.38 The Level 1 and Level 2 SFRA will be used to apply the sequential test, and where necessary the exceptions test in accordance with NPPF. The Functional Floodplain (Flood Zone 3b) is also mapped and provides important space for making space for flood waters when flooding from rivers occurs. Development should be directed away from these areas.
- 4.39 Surface water flood risk is an issue for all Greater Manchester districts. Only the upland areas in the north and east i.e. in Bury, Rochdale, Oldham, Tameside and Stockport are not covered in by the mapped surface water flood risk.
- 4.40 The SFRA highlights that the Environment Agency (EA) can designate Areas with Critical Drainage Problems (ACDPs). ACDPs may be designated where the EA is aware that development within a certain catchment / drainage area could have detrimental impacts on fluvial flood risk downstream, and / or where the EA has identified existing fluvial flood risk issues that could be exacerbated by upstream activities. No ACDPs have been identified within Oldham.
- 4.41 The risk of flooding along a canal is considered to be residual and is dependent on a number of factors. As canals are manmade systems that are heavily controlled, it is unlikely they will respond in the same way as a natural watercourse during a storm event. Flooding is more likely to be associated with residual risks, similar to those associated with river defences, such as overtopping of canal banks, breaching of embanked reaches or asset (gate) failure. The SFRA highlights the possible risk of flooding from canals of relevance to Oldham:
- Huddersfield Narrow Canal - a Canal Hazard Zone was produced for the Huddersfield Narrow Canal in Oldham; and
 - Rochdale Canal - canal breaches are most likely to occur at the lower lying areas of Chadderton and Failsworth.

¹⁰ The SFRA Management Framework can be found at: <https://www.greatermanchester-ca.gov.uk/media/1726/gmca-final-strategic-sfra-framework-january-2019.pdf>

- 4.42 The SFRA has provided maps to show where potential Working with Natural Processes (WwNP) should be investigated further as a means of flood mitigation against potential development sites.
- 4.43 Since the SFRA, mapping on Critical Drainage Areas (CDSs) has also been updated and GIS has been provided to the LPA. CDAs are those identified from historical flood events and/ or modelled data as having a significant risk from surface water flooding and include drainage catchments for the sewer network.

Proposed Policy Approach and Reasons

Policy CC3 - Managing Flood Risk

- 4.44 The policy sets out that the functional flood plain will be shown on the policies map and be used to store water and for green infrastructure. No development shall take place in Flood Zone 3b unless exceptional circumstances apply and development must not impede the flow of water in Flood Zone 3b and reduce the volume available for the storage of flood water.
- 4.45 The policy sets preference for new development to be located outside of flood zones 2 and 3. The policy sets out when a site-specific Flood Risk Assessment (FRA) is required and what a site -specific FRA should demonstrate.
- 4.46 The SFRA has identified the functional flood plain (Flood Zone 3b). The SFRA also included several policy recommendations which have informed the policy in addition to NPPF. This was in relation to policy text on:
- no development in flood zone 3b;
 - adhering to runoff rates stated by the LLFA (this is discussed below);
 - sequential approach to site allocation and site layout (the council added to this further by stating a preference for development to avoid flood zone 2 in addition to flood zone 3 in response to comments made by Environment Agency);
 - setting out requirements for when a site-specific FRA is required (this justifies criteria 1 to 9. However, the council specified that a site-specific FRA is required for sites over 0.5 in a CDA in line with the current approach and UU support); and
 - requirements for what a site-specific FRA should demonstrate (this justifies criteria 10 to 18).

Policy CC4 Sustainable Drainage – Foul and Surface Water

- 4.47 The policy requires that applications are supported by a strategy for foul and surface water management, where appropriate. The policy also sets out the surface water hierarchy. The policy specifies that greenfield run off rates is expected to for development on greenfield sites.
- 4.48 On brownfield sites the policy states that developments should aim to achieve greenfield run off rates, particularly within Critical Drainage Areas. A relaxation on outflow controls and/or the extent of attenuation storage will only be permitted with

the agreement of the LLFA and LPA at an early stage of the project but should never exceed the rate of discharge from the development prior to redevelopment for that event.

- 4.49 This approach to discharge rates on brownfield land has been developed through cooperative working with the Oldham LLFA, as recommended by the GM SFRA and Environment Agency. It seeks to set a higher standard than what is currently in the adopted Local Plan (of 50% reduction in discharge rates within a CDA and 30% elsewhere) as it is recognised that surface water run-off is a flood risk issue in Oldham.
- 4.50 The policy sets out further detail of what is required when considering the strategy for foul and surface water such as topography, finished flood levels and resilient design. The four pillars of sustainable drainage are referred to, which are in Ciria SuDS Manual and planning practice guidance. For larger sites / allocations the strategies must be part of a holistic site wide drainage strategy. This is to avoid piecemeal infrastructure provision.
- 4.51 The policy requires drainage, management and maintenance plans.
- 4.52 This policy has been mostly informed in addition to national policy and guidance by the representation made by UU, who suggested a policy approach. Some of the suggested wording has been incorporated into the justification, where this was felt appropriate. The council has also since then informally liaised with UU on refining the policy wording.

Integrated Assessment

- 4.53 Policies CC3 and CC4 scored positively or neutral. No mitigation or enhancements to the policies were required as a result of the IA process. The policies were not screened in by the HRA.

Policy CC5 - Water Efficiency

Feedback from Issues and Options consultation

- 4.54 United Utilities (UU) responded to the Issues and Options consultation stating that they recommend that the Local Plan includes a policy requirement for new development to be built to the optional water efficiency standard prescribed in Building Regulations.

- 4.55 Their response stated:

“We wish to recommend that the Local Plan includes a policy requirement for new development to be built to the optional water efficiency standard prescribed in Building Regulations. A tighter water efficiency standard in new development has multiple benefits including a reduction in water and energy use, as well as helping to reduce customer bills. Building Regulations includes a requirement for all new dwellings to achieve a water efficiency standard of 125 litres of water per person per day (l/p/d). In 2015 an ‘optional’ requirement of 110 l/p/day for new residential

development was introduced, which can be implemented through local planning policy where there is a clear need based on evidence.”

Issues to be addressed

- 4.56 The Climate Change topic paper published at Issues and Options stage noted the need to protect water resources.
- 4.57 The Scoping Report has since been updated (Update 2) and identifies the issues to be addressed include the need to:
- sustainably manage water resources and protect and enhance water quality.
- 4.58 The Local Plan has responded to these issues by highlighting why water efficiency is important. It states it is vital that water resources are carefully managed to reduce water stress and scarcity. Pressures such as population, housing growth and climate change adds stress to water resources therefore we need to manage sustainable growth and resilience to climate change through policies which can help manage water supplies sustainably.

Evidence Base

- 4.59 UU as part of their representation referenced evidence prepared by Water Resources West to justify the policy approach.
- 4.60 This is a 10-page document that sets out evidence to support adoption of Building Regulations Optional Requirement for local authorities in Northwest England and the Midlands. The area covered by Water Resources West is an area the Environment Agency has described as having ‘moderate water stress’; water scarcity/stress occurs when demand is high compared to the water that is available. Population growth, climate change and environmental protection measures all put pressure on water resources and contribute to water stress in our region. On top of this, housing shortages mean that lots more housing is needed. Planning policy is a vital tool to help ensure long term sustainable management of water supplies, as well as helping protect our local rivers and wildlife.
- 4.61 The Code for Sustainable Homes was launched in 2006 to help reduce UK carbon emissions and create more sustainable homes, In 2015 it was withdrawn and some of its standards were consolidated into Building Regulations including the requirement for all new dwellings to achieve a water efficiency standard of 125 litres of water per person per day (l/p/d). In the same year, the Government updated Building Regulations Part G, introducing an ‘optional’ requirement of 110 l/p/day for new residential development, which should be implemented through local policy where there is a clear need based on evidence.
- 4.62 The Northwest RBMP highlights a number of issues that are affecting the achievement of the WFD objectives, one of these is the pressures from water supply.
- 4.63 Local Authorities have a duty of care for communities and the environment and the reduction in water use can help to minimise the quantity of water taken from the environment as well as helping to control customer bills. There are some important factors to consider in this regard:

- Section 14 of the NPPF concerns “Meeting the challenge of climate change, flooding and coastal change” and paragraph 158 makes specific reference to water supply within this context.
 - Local Authorities must have regard to the River Basin Management Plans and any supplementary plans in exercising their functions and this includes taking action on water efficiency.
 - The production of mains water requires significant energy and chemical inputs and hence reducing demand for water can contribute significantly to reducing carbon emissions, especially where those savings are of hot water.
- 4.64 In March 2020, the Environment Agency published the National Framework for Water Resources. This identifies strategic water needs for England up to and beyond 2050. The National Framework identifies that our region faces the second highest pressures on Water Resources. Significantly, the National Framework identifies that increased consumption, driven by population increases, is the largest driver of additional water need in the region.
- 4.65 Based on the best available evidence the National Framework adopted a planning assumption of reducing average per capita consumption (PCC) to 110 l/p/d by 2050 nationally. Water Resources West’s projections are broadly consistent with that, with average per capita consumption reducing to 111 l/p/d by 2050. These projections are based on forecasts made for the water companies’ 2019 WRMPs.
- 4.66 Even with these reductions in consumption, parts of our region will need new water resources to be developed. If the planned reductions are not achieved, then more significant and more costly water resources will need to be developed. It is therefore important the measures are taken across the region to support the achievement of the lower per capita consumption.
- 4.67 Public concern also highlights the need to support water saving.
- 4.68 Water Framework Directive requirements are set out in River Basin Management Plans. Water efficiency measures have a direct effect in reducing the abstraction from water bodies assessed in those plans. Abstraction in turn affects the hydrological regime of those water bodies. The River Basin Management Plan for the North West identifies that there are waterbodies for which the hydrological regime does not support good status. In turn the hydrological regime can affect water quality, species and habitats.
- 4.69 In terms of the impact on viability the cost of installing water-efficient fittings to target a per capita consumption of 110l/d has been estimated as a one-off cost of £9 for a four-bedroom house. Research undertaken for the Welsh Government indicated potential annual savings on water and energy bills for householders of £24 per year as a result of such water efficiency measures.
- 4.70 The Greater London Authority carried out a survey of developers to test the viability of the 110 l/p/d standard. The results of this survey¹⁹ made it clear that those associated with the development industry did not consider that the proposed changes would have any impact on building.
- 4.71 Other LPAs have adopted the standard including Worcestershire, Bromsgrove and Redditch councils and Nottingham City Council.

- 4.72 In addition to the evidence outlined above, guidance on '[Complying with the biodiversity duty](#)'¹¹ published in May 2023 recommends actions that LPAs could take which includes reviewing policies including those on water efficiency.

Proposed Policy Approach and Reasons

- 4.73 The policy states:

“All new residential developments must achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates.

All major non-residential development shall incorporate water efficiency measures so that predicted per capita consumption does not exceed the levels set out in the applicable BREEAM ‘Excellent’ standard. Where the ‘Excellent’ Standard cannot be achieved, evidence must be submitted with an application to the satisfaction of the LPA. The BREEAM ‘Very Good’ standard must be met as a minimum.”

- 4.74 This policy has been directly informed by the UU representation at Issues and Options stage, and then further refined through informal liaising with UU. It has been informed by the Water Resources West evidence, which links to NPPF. In addition, PfE Policy JP-S5 provides a policy hook for Local Plans to set higher standards with regards to water efficiency.

Integrated Assessment

- 4.75 Policy CC5 scored positively or neutral. No mitigation or enhancements to the policy were required as a result of the IA process. The policy was not screened in by the HRA.

Policy CC6 Groundwater Source Protection Zones

Feedback from Issues and Options consultation

- 4.76 The UU representation highlighted that the Environment Agency has defined Groundwater Source Protection Zones (SPZs) for groundwater sources, which are often used for public drinking water supply purposes.
- 4.77 UU recommended policy wording on Groundwater Source Protection Zones to safeguard water quality.

Issues to be addressed

- 4.78 The Climate Change Topic Paper published at Issues and Options stage noted the need to protect water resources and avoid Groundwater Source Protection Zones.

¹¹ Guidance on the biodiversity duty can be found at: <https://www.gov.uk/guidance/complying-with-the-biodiversity-duty#actions-you-could-take>

- 4.79 The Scoping Report has since been updated (Update 2) and identifies the issues to be addressed include the need to:
- sustainably manage water resources and protect and enhance water quality.

Evidence Base

- 4.80 The Environment Agency defines Groundwater Source Protection Zones (SPZs) and these are available on the Environment Agency's website and on the Open Data Infrastructure Map on [Mapping GM](#)¹². These are areas that are often used for public drinking water supply purposes. Preventing pollution to drinking water is critical to ensure it is safe to use for public health.

Proposed Policy Approach and Reasons

- 4.81 The policy requires that developments consider impacts on water quality resulting from the design, construction and operation of development.
- 4.82 Development within Groundwater SPZs must accord with latest national guidance on Groundwater Protection and must conform to the policy criteria on risk assessment, masterplanning and construction management plan.
- 4.83 The proposed policy wording has been directly informed by the UU representation, with some of the text shown in the justification as appropriate and is in line with national guidance on groundwater protection (paragraph 180e in NPPF).

Integrated Assessment

- 4.84 Policy CC6 scored positively or neutral. No mitigation to the policy was required as a result of the IA process. The policy was not screened in by the HRA.

5. Further Work and Next Steps

- 5.1 Between the Draft Plan stage and Publication stage the council will identify which of the proposed site allocations fall within CDAs to ensure that appropriate policy wording is attached to any site allocations.
- 5.2 Any site-specific policy wording will also be added with regards to flood risk or water quality.
- 5.3 A further piece of evidence that could be undertaken if resources allow is a study which identifies areas of search for wind energy.

¹² Mapping GM can be found at: <https://mappinggm.org.uk/gmodin/>