Oldham Local Plan

Publication Plan: Addressing Climate Change Topic Paper

January 2026

Oldham Council

Contents

1. Introduction and Purpose

1.1. This is the Addressing Climate Change Topic Paper and is one of 13 topic papers produced to inform the consultation on the Oldham Local Plan: Publication Plan.

1.2. All Topic Papers can be found online at Oldham Council's website.[1]

1.3. The main purpose of the Topic Paper is to set out:

- the current key policies, plans and strategies relating to Addressing Climate Change that have informed the Local Plan;
- the main issues, challenges and opportunities relating to Addressing Climate Change that we face in Oldham, underpinned by proportionate and relevant evidence;
- how policies within the Oldham Local Plan: Publication Plan have been shaped, having regard to:
    - the key issues, challenges and opportunities facing the borough in relation to Addressing Climate Change;
    - responses received as part of the Oldham Local Plan: Draft Plan consultation and Duty to Co-operate discussions;
    - the outcomes of the Integrated Assessment, including any requirements of the Habitat Regulations Assessment; and
- how, with these policies, the Plan sets out an appropriate strategy that is based on proportionate evidence.

1.4. The Setting the Scene Topic Paper sets out the context for the Oldham Local Plan: Publication Plan, it's purpose and how it relates to the Places for Everyone Joint Development Plan Document.

1.5. The Topic Papers therefore support and complement the Oldham Local Plan: Publication Plan, demonstrating how policy choices have been informed, providing transparency around decision-making, and assisting those viewing the plan and the examining Inspector in understanding the rationale behind the Plan's content.

[1] Oldham Council's Local Plan Review, available at: https://www.oldham.gov.uk/info/201233/local_plan_review

2. Relevant Policies, Plans and Strategies

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

National Context

National Planning Policy Framework

2.2. National Planning Policy Framework (NPPF, December 2024, as amended February 2025) section 14 states that the planning system should support the transition to net zero by 2050 and take full account of climate impacts including water scarcity, storm and flood risks. It should help to minimize vulnerability and improve resilience, encourage the reuse of existing resources; and support renewable and low carbon energy and associated infrastructure (paragrapgh 161).

2.3. Paragraph 162 explains that plans should 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 and drought from rising temperatures.

2.4. Paragrapgh 165 explains 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 decentralized, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

2.5. With regards to flood risk, paragraphs 170 to 178 outline that 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, the development should be made safe for its lifetime without increasing flood risk elsewhere.

2.6. 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 and internal drainage boards.

2.7. 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.

2.8. A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding, by following the steps set out below.

2.9. Within this context 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.

2.10. The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).

2.11. Applications for some minor development and changes of use should also not be subject to the sequential test, nor the exception test set out below, but should still meet the requirements for site-specific flood risk assessments.

2.12. Having applied the sequential test, 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.

2.13. 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.

2.14. Both elements of the exception test should be satisfied for development to be allocated or permitted.

2.15. Section 15 of NPPF concerns the natural environment and outlines in paragraph 187 e) that planning policies should wherever possible help to improve local environmental conditions such as water quality.

National Planning Policy Guidance

2.16. Planning Practice Guidance on Renewable and low carbon energy[2] (August 2023) explains that 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.

2.17. When drawing up a Local Plan local planning authorities should first consider what the local potential is for renewable and low carbon energy generation.

2.18. There are no hard and fast rules about how suitable areas for renewable energy should be identified, but in considering locations, local planning authorities 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.

2.19. When identifying suitable areas, it is also important to set out the factors that will be taken into account when considering individual proposals in these areas.

2.20. Identifying areas suitable for renewable energy in plans gives greater certainty as to where such development will be permitted. 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.

2.21. 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).

2.22. Planning Practice Guidance on Flood risk and coastal change [3](2025) sets out detailed guidance on planning and flood risk.

[2] Planning Practice Guidance on Renewable and low carbon energy is available at: https://www.gov.uk/guidance/renewable-and-low-carbon-energy
[3] The Planning Practice Guidance on Flood Risk and coastal change is available at: https://www.gov.uk/guidance/flood-risk-and-coastal-change#para25

2.23. In plan-making a sequential approach to development and flood risk should be used by applying the 'Sequential Test' and, if needed, the 'Exception Test', as explained above.

2.24. A Strategic Flood Risk Assessment (SFRA) is used to identify the areas with low risk of flooding and to consider if development can be proposed entirely within areas with a low risk of flooding.

2.25. Where this cannot be achieved development should be considered within medium flood risk areas before high flood risk areas considering the 'vulnerability' of the development and the flood risk and its incompatibility with Flood Zones.

2.26. The guidance also highlights the importance of sustainable drainage systems (SUDS) to control surface water run off close to where it falls using a mixture of built and nature-based solutions. Where possible, preference should be given to multi-functional SUDS.

2.27. Particular types of sustainable drainage features may not be practicable or appropriate in some locations, such as the use of infiltration techniques from potentially polluting development in areas where groundwater provides a potable supply of water (e.g. Groundwater Source Protection Zone 1).

2.28. The guidance states that local planning authorities may wish to encourage the incorporation of rainwater harvesting in SUDS. Such systems are likely to be most appropriate for larger commercial or industrial applications and/or for development in areas with a current or likely future Water Stressed Area Classification.

2.29. Planning Practice Guidance on water supply, wastewater and water quality[4] (July 2019) states that water quality can be improved by protecting and enhancing green infrastructure.

2.30. Plan making may need to consider how to protect and enhance local surface water and groundwater, for example through steering development away from sensitive areas (such as source protection zones), and whether measures to improve water quality can be used such as through sustainable drainage.

2.31. Planning Practice Guidance on Housing: optional technical standards[5] (March 2015) sets out that a local planning authority may wish to consider whether a tighter water efficiency requirement for new homes is justified to help manage demand.

2.32. All new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day). Where there is a clear local need, local planning authorities can set out local policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.

[4] Planning Practice Guidance on water supply, wastewater and water quality is available at: https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality#water-quality
[5] Planning Practice Guidance on Housing: optional technical standard is available at: https://www.gov.uk/guidance/housing-optional-technical-standards#water-efficiency-standards

2.33. The need for higher standards should be based on existing sources of evidence and through consultations with local water and sewerage company, the Environment Agency and catchment partnerships, and consideration of the impact on viability.

Greater Manchester Context

Greater Manchester Strategy

2.34. The Greater Manchester Strategy [6] (July 2025) sets the vision for a thriving city region where everyone can live a good life. This means a greener and more equal place where everyone will have a safe, healthy, low carbon, nature rich environment. All our businesses will be making progress towards sustainable and net zero production.

2.35. The strategy notes that we need to take urgent action to reduce carbon emissions and reverse the decline of the natural environment across the city region. In the next decade, we must change the way we heat our homes. We'll also need to support nature recovery, adapt our city region to the ever-increasing risks posed by climate change (particularly flooding) and encourage residents and businesses to live and operate in more sustainable ways.

2.36. Our commitment to achieve net zero by 2038 is central to our work to ensure the wellbeing of future generations. We're already leading a shift to clean green energy: increasing solar, wind and green hydrogen will dramatically reduce the one fifth of our emissions generated by industry and increase our contribution to the UK's renewable energy. We're also using household waste to generate electricity.

2.37. Our integrated water management collaboration with United Utilities and the Environment Agency is transforming how we respond and adapt to flooding, droughts and climate change. It aims to reduce water used in our homes by a quarter, and in industry and elsewhere by 15%.

Greater Manchester Net Zero Design Guidance

2.38. Three Net Zero guidance documents[7] and a supporting proforma have been produced to support the implementation of the adopted PfE policies JP-S2 'Carbon and Energy' and JP-S3 'Heat and Energy Networks'.

Integrated Water Management Plan (June 2023)

2.39. GMCA, United Utilities and the Environment Agency have produced an Integrated Water Management Plan[8] to draw together a collective vision, objectives, and actions, and identify accountability and capacity for delivery.

---

[6] The Greater Manchester Strategy is available at: https://togetherwearegm.co.uk/our-vision/greater-manchester-strategy/
[7] The Net Zero guidance is available at: https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/strategic-planning/places-for-everyone/net-zero-design-guidance/
[8] The Integrated Water Management Plan is available at: https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/strategic-planning/integrated-water-management-plan/

2.40. The Vision is “Working together, we will manage Greater Manchester’s water wherever it falls, to enhance the environment, support people and forge prosperous places”.

2.41. The ambitions to achieve by 2050 are:

- Forging prosperous places: Places across Greater Manchester will be sustainable and climate resilient, which will support economic growth.
- Working together: working as a partnership we will ensure that planning and decisions are integrated across Greater Manchester to ensure that investment delivers multifunctional benefits.
- Managing Water: In the face of a changing climate the partnership will ensure that action is taken to continually improve people and places resilience to the impacts of flooding, drought and pollution.
- Enhancing the environment: Water management interventions will preference nature-based solutions; creating green, vibrant places across the city region.
- Supporting people: Increased access to nature will bring health and wellbeing benefits alongside an increase in skills and jobs to support Greater Manchester’s green economy.

2.42. To enable the vision the following objectives to achieve by 2030 have been set:

- Improve the water environment by meeting storm overflow reduction targets for 35% of high priority sites in Greater Manchester.
- Work together to invest more than £1bn to reduce flood risk and improve water quality.
- Leverage an additional £200m benefit from more than £1.2bn investment in Transport, Regeneration and other infrastructure investment programmes.

2.43. The plan sets out workstreams for achieving the objectives and ambitions.

Greater Manchester Five-Year Environment Plan 2025-2039

2.44. The Five-Year Environment Plan[9] (2025-2030) creates a framework for all decision makers to take the next actions required to progress towards our long-term environmental vision and ensure everyone in Greater Manchester has a healthy, low carbon, nature-rich environment in which to live-well, prosper and grow.

2.45. The vision is that Greater Manchester will be a nature-rich and carbon neutral city region where all citizens have access to affordable renewable energy, warm climate resilient homes, high quality blue and green spaces, healthy and locally produced food, and a reliable, integrated, inclusive, sustainable and affordable transport system, where avoidable waste is significantly reduced.

2.46. Greater Manchester will lead the way in becoming an innovative, circular and resource efficient green economy with thriving sustainable businesses, secure and

[9] The Five Year Environment Plan is available at: https://www.greatermanchester-ca.gov.uk/what-we-do/environment/five-year-environment-plan/

well-paid green jobs and an active local supply chain. Increased prosperity will also bring benefits for nature with increased urban greening and investment in the natural environment.

2.47. Greater Manchester's urban environments will be cleaner and greener containing more trees and green spaces and providing environments for nature to thrive. Buildings will be energy efficient and powered by renewable energy. Rural environments will be managed for nature recovery and to protect wildlife. Across the city-region air and water quality will be cleaner due to reduced emissions and pollution.

2.48. This transition will reduce inequalities across the city region and both citizens and businesses will be actively engaged in creating and maintaining a thriving biodiverse and carbon neutral city region.

2.49. The Plan sets out eight key aims for the city region. The aims that relate to this topic paper include:

1. Our energy infrastructure is smart, flexible and fit for a low carbon future.
2. Our buildings are sustainable and energy efficient.
3. Our city-region is better adapted and more resilient to the increasing impacts of climate change.

2.50. The plan sets out further detail under each action, for example increasing renewable energy generation and energy storage; and reduce pressures on our water environment.

Drainage and Wastewater Management Plan (May 2023, United Utilities)

2.51. The Drainage and Wastewater Management Plan[10] (DWMP) is a long-term plan, which sets out how United Utilities Water (UUW) proposes to ensure robust and resilient drainage and wastewater services for the North West.

Final Drought Plan (2022, United Utilities)

2.52. The Drought Plan[11] outlines United Utilities' approach in managing water supplies to make sure there's always enough clean safe water available during a drought.

2.53. Greater Manchester falls within the Strategic Resource Zone. The plan explains the drought triggers applicable to this zone.

[10] The Drainage and Wastewater Management Plan is available at: https://www.unitedutilities.com/corporate/about-us/our-future-plans/Our-long-term-plans/
[11] The Drought Plan is available at: https://www.unitedutilities.com/corporate/about-us/our-future-plans/water-resources/drought-plan/

Final Water Resources Management Plan 2024 (December 2024, United Utilities)

2.54. The Water Resources Management Plan[12] sets out a strategy to achieve a long-term, best value and sustainable plan for water supplies in the North West. It ensures that there is an adequate supply to meet demand over the 25 years from 2025 to 2050.

2.55. Objectives include:

1. maintain a resilient, safe and clean supply of water for customers;
2. develop a plan to support national drought resilience through water transfer and which is in line with our water transfer principles;
3. ensure that our plan enables us to meet our long-term environmental destination; and
4. ensure that our plan delivers environmental benefits, taking into account sustainability and natural capital effects.

North West River Basin Management Plan (2022, EA)

2.56. The North West River Basin Management Plan[13] sets out measures to protect and improve the water environment.

2.57. The interactive maps set out ecological and chemical objectives for surface waters and quantitative and chemical objectives for groundwater.

Upper Mersey Catchment Plan (2023, Catchment Based Approach)

2.58. The vision in the Catchment Plan[14] is to deliver a healthy water environment, which is rich in wildlife and a real community asset that is resilient to climate change, supports economic growth, and health and wellbeing.

2.59. The objectives of the partnership are to:

- create cleaner and healthier water bodies;
- protect and enhance Nature Recovery and the natural aspects of our catchment; and
- develop a catchment which is more resilient to the effects of climate change.

[12] The Water Resources Management Plan is available at: https://www.unitedutilities.com/corporate/about-us/our-future-plans/water-resources/water-resources-management-plan/

[13] The North West River Basin Management Plan is available at: https://www.gov.uk/guidance/north-west-river-basin-district-river-basin-management-plan-updated-2022

[14] The Upper Mersey Catchment Plan is available at: https://www.merseyriverstrust.org/media/f4vbsda5/formatted_revised_plan_march_2023_v3.pdf

Irwell Catchment Plan 2019 – 2027 (Irwell Catchment Partnership)

2.60. The objective of the Irwell Catchment Plan[15] is to work collaboratively to make the water environment in the Irwell catchment more adaptive and resilient to climate change, whilst addressing environmental inequalities. The partnership will:

- create clean and plentiful water for wildlife and people;
- restore rivers to improve their natural forms and function;
- work to improve biodiversity and protect habitats;
- engage and connect more with their local water environment;
- influence decision makers to ensure the natural environment is enhanced and protected; and
- support and contribute to integrated waste management practice.

Places for Everyone (PfE)

2.61. The Places for Everyone[16] (PfE) Joint Development Plan Document (DPD), is a strategic plan that covers nine of the ten Greater Manchester districts - Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan. The Plan took effect and became part of the statutory development plan for each of the nine PfE authorities on 21 March 2024.

2.62. The relationship between PfE and the Oldham Local Plan: Publication Plan is explained in the Setting the Scene Topic Paper.

2.63. The following PfE policies are relevant to this Addressing Climate Change Topic Paper:

2.64. **Policy JP-S1: Sustainable Development** states that 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.

2.65. **Policy JP-S2: Carbon and Energy** sets out ways in which the aim of delivering a carbon neutral Greater Manchester no later than 2038, with a dramatic reduction in greenhouse gas emissions, will be supported. This includes through:

1. Promoting the retrofitting of existing buildings with measures to improve energy efficiency and generate renewable and low carbon energy, heating and cooling;

[15] The Irwell Catchment Plan is available at: https://catchmentbasedapproach.org/get-involved/irwell/#:~:text=The%20Irwell%20Catchment%20Plan%20has,cycle%2C%20and%20is%2C%20through%20our

[16] Places for Everyone is available at: https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/strategic-planning/places-for-everyone/pfe-adoption/

2. 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:
    a. Be net zero carbon which applies: from adoption – to regulated operational carbon emissions; from 2028 – to all emissions 'in construction'. From 2025 development should also calculate and minimise carbon emissions from unregulated emissions alongside regulated emissions;
    b. Incorporate adequate electric vehicle charging points;
    c. 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;
    d. 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
6. For renewable energy generation priority should be given to PV installation.
    e. 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.
    f. Include a detailed energy statement.

2.66. **Policy JP-S3: Heat and Energy Networks** sets out measures to achieve decentralised energy infrastructure. This includes identified Heat and Energy Network Opportunity Areas where major development is expected to connect to an existing or planned heat/energy network or be designed to enable future connection; and / or install a site-wide or communal heat/energy network solution.

2.67. Within opportunity areas new industrial development is expected to demonstrate that opportunities for using waste heat locally have been fully examined; publicly-owned buildings and assets adjoin new major development sites, opportunities for these buildings and assets to connect to site-wide proposals will be considered; and an expectation that any site-wide networks will be designed so as to enable future expansion to adjoining buildings or assets as appropriate.

2.68. **Policy JP-S4: Flood Risk and the Water Environment** sets out that an integrated catchment-based approach will be taken to protect the quantity and quality of water

bodies with reference to the North West River Basin Management Plan and managing flood risk.

2.69. Criterion 4 states 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.

2.70. Criterion 7 states 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.

2.71. **Policy JP-S6: Resource Efficiency** states that 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 will help chieve Greater Manchester becoming a leading green city.

2.72. **Policy JP-G3: Rivers and Waterways** aims to protect and improve river valleys and waterways including to improve water quality (criterion 6).

Local Context

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

The Oldham Plan

2.74. The Oldham Plan[17] 2024-2030 Pride, Progress and Partnership sets out three clear missions to achieve by 2030 to deliver real improvements to the lives of Oldham people. The mission most relevant to Addressing Climate Change is:

2.75. Green & Growing – making Oldham a place where economic growth benefits all residents, creating opportunities for businesses to succeed while ensuring our community and environment thrive. By attracting new investment, supporting local businesses, and leading in green technologies, we will generate quality job opportunities and equip people with the skills they need to succeed.

[17] The Oldham Plan is available at: https://www.oldham.gov.uk/info/201261/oldham_plan/3207/oldham_plan

Oldham Council Corporate Plan

2.76. Oldham Council's Corporate Plan[18] 'Ready for the Future' (2024-2027) builds on the Oldham Plan and is focused on the same three goals – Healthier, Happier Lives, Great Place to Live and Green and Growing.

2.77. Relevant to Addressing Climate Change the plan seeks to achieve the green and growing mission through:

- being on our way to making Oldham a carbon-neutral borough by 2030.
- maximising opportunities for green investment and jobs in the green economy.
- homes of a great standard, that are affordable for all local people.

Building a Better Oldham

2.78. Building a Better Oldham[19] is the Council's ambitious transformation programme for the borough. As with the Partnership's missions, the Local Plan support's delivery of this ambitious programme. Further information can be found in the Setting the Scene Topic Paper.

2.79. In relation to Addressing Climate Change the ambition and vision is that we will be Building a Better Oldham by ensuring Oldham is the greenest borough and by embedding sustainability, energy efficiency & low (zero) carbon infrastructure.

Oldham Green New Deal Strategy

2.80. The Oldham Green New Deal Strategy[20] 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'. The Strategy puts in place a framework to work with our residents and partners to make Oldham an even greener, smarter, more enterprising place.

2.81. Central to the Green New Deal Strategy are two new ambitious targets for achieving carbon neutrality:

- carbon neutrality for the Council by 2025 – to be achieved through reducing CO2 emissions from Council buildings and street lighting; investing in large-scale renewable energy generation; and implementing local, meaningful and verifiable 'carbon offset' measures (i.e. tree planting); and
- carbon neutrality for the borough by 2030 – to be achieved through developing a Local Energy Market to incentivise renewable energy development; investing in and supporting the development and roll-out of

[18] The Corporate Plan is available at: https://www.oldham.gov.uk/downloads/file/8094/oldham_corpotrate_plan_ready_for_the_future
[19] Information on Building a Better Oldham is available at: https://www.oldham.gov.uk/info/201248/building_a_better_oldham#:~:text=Building%20a%20Better%20Oldham%20is,jobs%20and%20100%20apprenticeship%20opportunities.
[20] The Green New Deal Strategy is available at: https://www.oldham.gov.uk/gnds

large-scale low carbon anchor energy infrastructure such as low carbon heat networks; supporting the development of the Green Technology and Services sector across the borough; and maximising the local benefits from GM and national level schemes which aid decarbonisation, including air quality and transport.

2.82. The Green New Deal Strategy sets out the Council's approach to achieving these targets, enabled by the development of, and investment in, the 'green' sector in Oldham's local economy.

Oldham Green Infrastructure Strategy

2.83. The Oldham Green Infrastructure Strategy[21] (2022) vision is that by 2037 the borough will be a carbon neutral exemplar with a Green Infrastructure network which brings multiple benefits to people, wildlife and neighbourhoods. The strategy sets out seven priorities which includes 'Carbon Neutral Oldham', 'Slowing the Flow and Water Quality' and 'Sustainable Growth and Green Jobs'.

2.84. The strategy explains that Green Infrastructure is able to help with adaption and mitigation of climate change and to assist in meeting de-carbonisation targets. Networks of Green Infrastructure can help prevent increased rainfall causing flood damage. SuDS can help slow surface water flows. Peat bogs, trees and diverse grasslands are able to lock up carbon from the atmosphere.

2.85. Green Infrastructure can be planned in a way that helps to reduce the frequency and severity of flooding, drawing on catchment wide approaches for landscape scale management. SuDS and natural flood management (NFM) such as woodland planting, leaky dams and grip-blocking can slow the flow of surface water whilst providing a range of other benefits for wildlife.

2.86. There are four rivers that find their source in Oldham: River Beal, River Tame, River Medlock and River Irk. All of these are subject to flooding downstream and SuDS and natural flood management can mitigate some of these risks. Water quality is also pertinent to better management of riparian land in the upper section of the rivers can reduce sediments reaching the rivers.

2.87. Oldham's Green Infrastructure can support sustainable growth and green jobs through generating inbound tourism; keeping Oldham at the forefront of development and deployment of cutting-edge environmental technologies; and ensuring that everyone is 'carbon literate' and actively engaged in delivering environmental change.

2.88. The Green Infrastructure Strategy maps out needs and opportunities in relation to each priority.

[21] The Oldham Green Infrastructure Strategy is available at: https://www.oldham.gov.uk/downloads/download/2183/oldham_green_infrastructure_strategy

Oldham Local Area Energy Plan

2.89. The Oldham Local Area Energy Plan[22] (2021) identifies opportunities for low carbon energy including solar, hydrogen, heat pumps, electric vehicle charging and a district heat network.

[22] The Oldham Local Area Energy Plan is available at: https://committees.oldham.gov.uk/documents/s129736/OS%20Feb%2022%20-%20OGND%20Appx%20C_Oldham%20LAEP.pdf

3. Issues, challenges and opportunities relating to Addressing Climate Change

3.1. This section summarises the main issues, challenges and opportunities relating tp Addressing Climate Change that we face in Oldham, underpinned by proportionate and relevant evidence.

Supporting renewable and low carbon energy

3.2. The Integrated Assessment identifies that there is the need to reduce energy use, promote energy efficiency, and promote renewable and low carbon energy.

3.3. PfE sets out policies for sustainable development, carbon and energy and heat and energy networks. There is not a need to repeat these policies in the Local Plan.

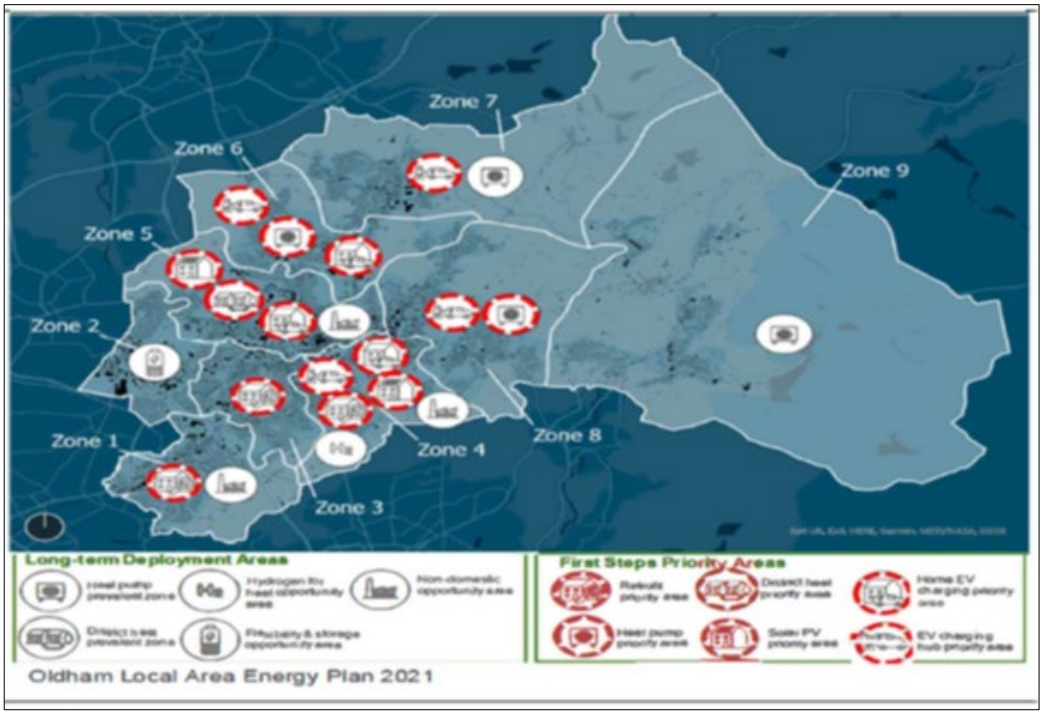
3.4. Instead, there is the opportunity to set out a positive strategy for renewable and low carbon energy schemes so that applicants can clearly see the issues that may need to be considered upfront when considering proposals. The existing Core Strategy sets out a criteria-based policy for assessing such applications and it is considered useful to carry this approach forward, albeit updated, into the revised Local Plan. PfE does not set out such a policy.

3.5. The Local Plan is supported by the Oldham Local Area Energy Plan (LAEP) which identifies opportunities for low carbon energy including solar, hydrogen, heat pumps, electric vehicle charging and a district heat network.

3.6. 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.

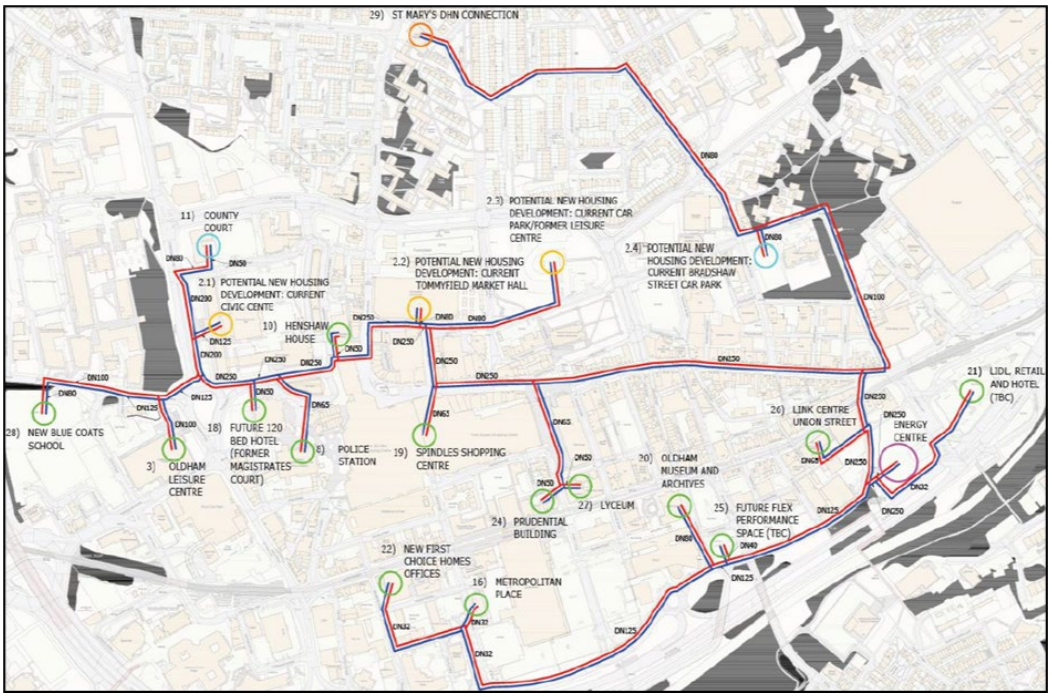
Map 1: Local priorities and measures to achieving decarbonisation (LAEP)



3.7. 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.

3.8. In addition, the Council is working on an Oldham Mine Water Heat Network project.

Map 2: Potential expansion of St Marys Heat Network across Oldham Town Centre including a new Minewater Energy Centre



3.9. The Council will support proposals for renewable energy providing that any environmental and social aspects are appropriately addressed including impacts on landscape, townscape, natural, historical, and cultural features, Green Belt, biodiversity, flood risk and areas of nature conservation interest.

Managing Flood Risk

3.10. The Integrated Assessment identifies that there is the need to avoid and mitigate against flood risk and adapt and be resilient to climate change.

3.11. Feedback from Issues and Options and on the Draft Plan have highlighted the importance of this issue.

3.12. PfE sets out policy on an integrated catchment-based approach to manage flood risk. PfE was supported by a Level 1 and Level 2 Strategic Flood Risk Assessment[23].

3.13. Updates to Environment Agency Flood Maps for Planning for Flood Zones and surface water flood risk, including climate change, means that the GM SFRA can no longer be used in its entirety for the Oldham Publication Plan.

3.14. However, the following outputs are still considered to be relevant and have been used in the Oldham SFRA update:

- Canal Hazard Zones; and
- Reservoir Extents.

3.15. To prepare for the Oldham Local Plan publication stage an updated SFRA and application of the Sequential Test was discussed as part of Duty to Cooperate matters with the Environment Agency and United Utilities.

3.16. It was agreed that this could be done internally using updated flood risk information and supported by a SFRA covering note.

3.17. The scope of the SFRA covers the housing and employment land supply as well as existing Business and Employment Areas (BEAs). There are no site allocations in the Publication Oldham Local Plan. The Local Plan also only consists of non-strategic planning policies.

3.18. The following data has been used to assess the land supply and BEAS.

[23] The GM Level 1 and 2 Strategic Flood Risk Assessment is available at: https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/strategic-planning/places-for-everyone/pfe-previous-stages/places-for-everyone-2021-regulation-19/supporting-documents-2021/?folder=04%20Sustainable%20and%20Resilient%20Places#fList

Table 1: Sources of information used to assess the land supply and BEAs

Flood Risk Data	Source
Flood Zones 2 and 3	Environment Agency[1]
Climate change maps	In order of preference: Updated Beal outputs, where applicable; Greater Manchester SFRA modelling where undertaken; then Environment Agency[2],
Risk of Flooding form Surface Water	Environment Agency[3]
Risk of Flooding from Surface Water – Climate Change	Environment Agency[4]
Updated Beal outputs	Environment Agency
Canal Hazard Zones	Greater Manchester SFRA 2019
Reservoir extent	Greater Manchester SFRA 2019
Critical Drainage Areas	JBA 2023
Flood Zone 3b	GM SFRA and updated Beal outputs

3.19. The layers listed above were mapped against the land supply and BEAs and the flood risk areas within each site boundary were expressed in square metres and percentages so that conclusions could be drawn and fed into the application of the Sequential Test.

3.20. In addition to this, information was available from United Utilities on sewer flood risk on site or in the vicinity of the site and United Utilities assets falling within site boundaries and this has been fed into the spreadsheet, where available.

3.21. The SFRA provides an overview of flood risk in Oldham and details the results of the Sequential test.

3.22. The Oldham Strategic Flood Risk Assessment is available to view alongside this Topic Paper, as a separate document.

3.23. As part of updating the SFRA the functional flood plain (flood zone 3b) was taken from the GM SFRA (2019) and updated with outputs from the Beal modelling, which was provided by the Environment Agency. The revised Flood Zone 3b is shown on the Policies Map.

3.24. In 2023, GMCA commissioned JBA to update Critical Drainage Areas (CDAs) for Greater Manchester. CDAs are used within plan policy to inform whether a development should be subject to a site-specific Flood Risk Assessment.

3.25. The GM Level 1 SFRA has also been used to inform Policy CC2 as the SFRA set out eight policy recommendations, which it recommended using to translate into meaningful policy for flood risk and water management.

Water Efficiency

3.26. The Integrated Assessment identifies that there is the need sustainably manage water resources and protect and enhance water quality.

3.27. PfE Policy JP-S4: Flood Risk and the Water Environment Criterion 7 clearly outlines Local Plans giving consideration to 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.

3.28. 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 currently include 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/d for new residential development was introduced.

3.29. In support of Policy CC4 United Utilities have prepared 'Evidence Submitted by United Utilities Water Limited to Justify the Implementation of the Optional Standard for Water Efficiency in Part G of Building Regulations' (November 2025). Please see Appendix 1.

3.30. United Utilities Water Limited (UUW) strongly supports the implementation of the tighter water efficiency standard within development plan policy. Planning Practice Guidance (PPG) outlines a range of primary sources of evidence that can be used to justify the implementation of the tighter standard for water efficiency in the construction of new dwellings. Below is a summary of the evidence submitted by United Utilities:

- The Water Resource Management Plan (WRMP) (2024) confirms that the Strategic Resource Zone (SRZ), which Oldham falls within, faces a growing water supply-demand deficit that is projected to significantly worsen without intervention such as water demand reduction measures.

- As such the WRMP requests that all local authorities in the supply area adopt the optional minimum building standard of 110 litres per person per day in all new builds.

- The paper states the Environment Agency has supported the implementation of the tighter standard for water efficiency in other local authorities covered by the SRZ.

- Viability evidence (2024) confirms the tighter standard incurs no additional cost and can be implemented with a fittings-based approach.

- UU recommend inclusion of the policy which can be seen in Policy CC3.

- This policy is justified by national legislation, policy and guidance including the Water Industry Act 1991, NPPF, National Panning Practice Guidance. The Guidance makes clear that the water stressed classification is not the only source of primary evidence which can be used to justify the implementation of the tighter water efficiency standard.

- The United Utilities Area is experiencing moderate stress. In relation to this it is recommended that there should be some activity to ensure that water is used more efficiently and effectively.

- The North West River Basin Management Plan identifies a high percentage of water bodies in the North West as not achieving good ecological status. The associated HRA identifies water demand management as a measure proposed to manage the flow and level of water.

- The Water Resources West Water Efficiency in New Homes recognises the region faces the second highest pressures on water resources in England, largely due to population growth.

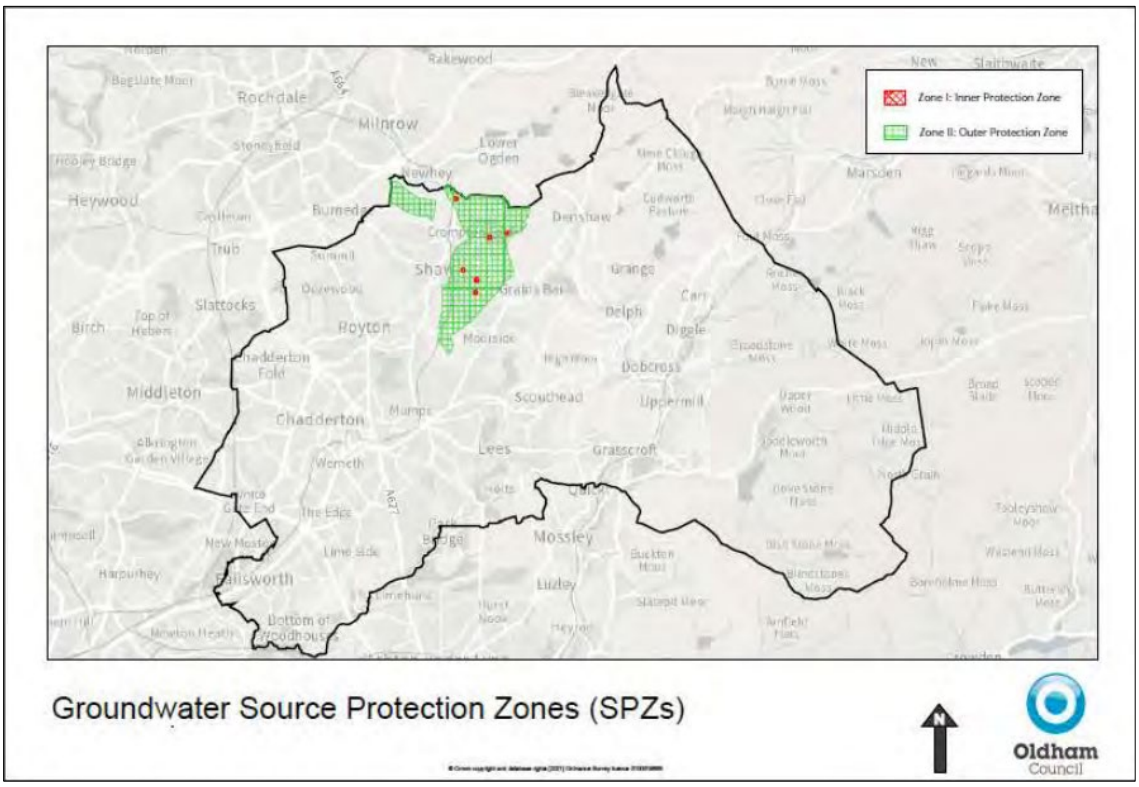
Groundwater Source Protection Zone

3.31. The Environment Agency defines Groundwater Source Protection Zones (SPZs), and these are available on the Environment Agency's website. 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.

3.32. The purpose of SPZs is to provide additional protection to safeguard drinking water quality through constraining the proximity of an activity that may impact upon a drinking water abstraction. This is part of an initial screening process in assessing impacts to groundwater resources. Zones around location sites are defined by groundwater travel time to an abstraction.

3.33. Part of Oldham is covered by Groundwater SPZs as shown in Map 3 below.

Map 3: Groundwater Source Protection Zones



4. Addressing Climate Change and the Oldham Local Plan: Publication Plan

4.1. This section of the Topic Paper looks at each of the policies contained in the Addressing Climate Change chapter of the Oldham Local Plan: Publication Plan.

4.2. For each policy the Topic Paper shows how policies within the Oldham Local Plan: Publication Plan have been shaped to provide an appropriate strategy for the borough that is based on proportionate evidence and having regard to:

- The key issues, challenges and opportunities facing the borough in relation to Addressing Climate Change;
- Responses received as part of the Oldham Local Plan: Draft Plan consultation and Duty to Co-operate discussions; and
- The outcomes of the Integrated Assessment, including any requirements of the Habitat Regulations Assessment.

Policy CC1: Renewable and Low Carbon Energy

Summary of evidence

4.3. PfE sets out policies for sustainable development, carbon and energy and heat and energy networks. PfE was supported by its own evidence.

4.4. The Oldham Local Area Energy Plan (LAEP) identifies opportunities for low carbon energy including solar, hydrogen, heat pumps, electric vehicle charging and a district heat network.

4.5. The LAEP did not assess wind energy. The Local Plan states that proposals for wind energy can be considered across the borough, except within 400m of the South Pennies Moors Special Area of Conservation (SAC) / Special Protection Area (SPA) as shown on the Policies Map. A 400-metre exclusion buffer has been applied to be consistent with PfE Policy JP-G5 Uplands criterion 7 and the South Pennine Mors SAC / SPA SPD.

4.6. To support proposals for renewable and low carbon energy Policy CC1 has set out the criteria that would be considered so that applicants can consider this during the design stages.

Draft Local Plan consultation and Duty to Co-operate

4.7. There was support for the principle of the policy at Draft Plan stage (which was Policy CC2 at the time) from all but one respondent. Respondents requested some amendments, which are summarised in table 2 below.

Table 2: Summary of comments and amendments to Policy CC2 Renewable and Low Carbon Energy at Draft Plan stage (now Policy CC1)

Respondent	Summary of Comment	Council Response
Historic England, TFGM, National Highways	Support policy.	Support noted
Natural England	Welcome reference to South Pennine Moors SAC and note 400m buffer. Request reference to: • Functionally Linked Land • Role nature pays in climate change adaptation • Protection and enhancement of peatlands	Reference to the role that nature plays in providing key services for climate change has been added to the introduction paragraphs within the climate change section. Reference to Functionally Linked Land has been added to CC1 criterion 3 as well as reference to the South Pennine Moors SAC/SPA SPD in the Reasoned Justification. Reference to Peat added to Policy CC1 criterion 4. Reference to Natural England's Peat Map and the Field Protocol has also been added to the Reasoned Justification of Policy N1.
Lancashire Wildlife Trust	Support the exclusion of 400m of the South Pennine Moors SAC/ SPA from the search area for wind energy but feel that reference needs to be made to the exclusion of deep peat soils as well. Reference could be made to the peat maps Natural England are reviewing.	Reference to peat added to Policy CC1 criterion 4. Reference to Natural England's Peat Map added to the Reasoned Justification of Policy N1.
Peak District National Park	The setting of the National Park should be listed as a constraint.	The purposes of the Peak District National Park have been added (criterion 14).
Sport England	Object to the policy. Would like to see reference to playing field protection.	Criterion 7 includes loss of open space, and this includes playing pitches. The communities section addresses open space. and the plan should be read as a whole.
United Utilities	Welcome criterion 7 of this policy. However, recommend additional	Support noted. Water catchment land added to criteria

Respondent	Summary of Comment	Council Response
	specific policy relating to water catchment land suggested wording provided.	in Policy CC1. The suggested text has been added to the Reasoned Justification.

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

4.9. Oldham Council met with Natural England on 11 July 2025 to discuss the amendments that had been made. Natural England were satisfied with the amendments on Policy CC1.

4.10. Oldham Council met with Sports England on 26 June 2025. It was agreed that Oldham Council would review policies CO1, CO2 and CO3 relating to open space, sport and recreation facilities to ensure that they accurately reflect the latest evidence produced since the Draft Plan was published (Playing Pitch Strategy 2025). It was felt that the amended approach may negate some of the amendments requested on policies elsewhere across the Plan.

Policy Approach

4.11. Policy CC1 has been drafted to set out local criteria that will be considered when proposals for renewable and low carbon development are being proposed. PfE does not include such policy and therefore it is considered helpful for applicants to have the criteria that will be considered within a local policy.

4.12. Policy CC1 outlines that proposals for renewable and low carbon energy development including supporting infrastructure, will be supported where the policy criteria have been appropriately addressed. The policy then sets out 17 criteria that may be relevant to a proposal. A Landscape Impact Assessment may be required.

4.13. The policy states proposals for wind energy can be considered across the borough, except within 400m of the South Pennies Moors SAC /SPA as shown on the Policies Map.

4.14. Where appropriate, any proposal should include full details of the arrangements for decommissioning and the reinstatement/restoration of the site at the end of its operational life.

4.15. The Reasoned Justification text sets out details from the LAEP and directs readers to the South Pennine Moors SAC / SPA SPD and provides further detail on the criterions.

4.16. The policy is intended to be helpful to an applicant in terms of outlining considerations at the design stage of a proposal.

4.17. Since Draft Plan stage the main amendments to the policy have been to refer to:

- functionally liked land;
- water catchment land; and the
- the purposes of the Peak District National Park.

4.18. The additional criteria were added in response to the Draft Plan consultation. Whilst United Utilities had no comments on this policy they did request a new policy on water catchment land. Oldham Council did not feel this was required as the area covered by the water catchment land is the uplands where development is not focussed. However, it was felt that Policy CC1 should include water catchment land as a criterion instead.

4.19. Oldham Council met United Utilities on 9 July 2025 where this approach was outlined and United Utilities were satisfied.

Monitoring

4.20. Policy CC1 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.

4.21. The Local Plan indicator associated with this policy is:

- % of households living in fuel poverty.

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

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

4.23. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy CC1.

Integrated Assessment

4.24. The Integrated Assessment of Policy CC1 resulted in 14 positive / significantly positive scores and 12 neutral scores. No amendments were made to the policy as a result of the IA at Publication Plan Stage. For previous stages of the IA please see the IA report.

4.25. The HRA has screened the policy in due to potential impacts from direct land take (wind farms and solar farms), indirect disturbance and loss of functionally linked land.

4.26. The HRA identifies mitigation measures to address any likely significant effects. This includes:

- Holcroft Moss Planning Obligations Joint SPD;
- South Pennine Moors SAC/ SPA Joint SPD;
- Integrated Plan Policies N1, N2, N3, CC2, CC3 and LE3; and
- Places for Everyone Policies including JP-G5 and JP-C8.

Policy CC2: Managing Flood Risk

Summary of evidence

4.27. The GM SFRA Level 1 has provided policy recommendations which have fed into the policy, in addition to national planning policy guidance and consultation feedback.

4.28. An Oldham SFRA (2025) has been prepared which has allowed application of the Sequential Test for the housing and employment land supply and Business Employment Areas. A separate SFRA report is available. The Council liaised with the Environment Agency on the SFRA and Sequential Test.

Draft Local Plan consultation and Duty to Co-operate

4.29. There was general support for the policy at Draft Plan stage (which was Policy CC3 at the time). Respondents requested some amendments, which are summarised in table 3 below.

Table 3: Summary of comments and amendments to Policy CC3 Managing Flood Risk at Draft Plan stage

Respondent	Summary of Comment	Council Response
Lancashire Wildlife Trust and TFGM	Support for policy.	Noted.
Canals and River Trust	Highlighted that flood risk from canals can exist. Flood Risk Assessments should address this risk where applicable, including the residual risk of any infrastructure failure.	Reference to Canal Hazard Zones added to criterion 7 and the Reasoned Justification to make presence of this source of flood risk clearer.
Environment Agency	The reference to locating development outside of Flood Zones 2 and 3 and applying the sequential test - the national guidance states that a sequential, risk-based approach should be followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. It may be appropriate include reference to surface water risks in this paragraph relating to the sequential test. Policy refers to development only being permitted in flood zone 3b in exceptional circumstances. Only water compatible and essential	The policy has been amended to state development should be located in areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. The policy has also removed reference to exceptional circumstances.

Respondent	Summary of Comment	Council Response
	infrastructure is permitted, and this should be clarified.	
United Utilities	Request reference is made to the need to consult with UUW regarding any risk of flooding from reservoirs. Recommended text suggested on changes in levels to the public sewer.	The following text has been added to the Reasoned Justification of Policy CC2: *Applicants must engage with United Utilities if a site is identified as being at risk of flooding from a reservoir.* *Applicants must not assume that changes in levels or that changes to the public sewer (including diversion), will be acceptable as such proposals could increase / displace flood risk.*

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

4.29. Oldham Council met with United Utilities on 9 July 2025 and at a joint United Utilities and Environment Agency meeting on 11 July 2025 to discuss the amendments that had been made and the scope of the SFRA. The amendments were view as satisfactory.

Policy Approach

4.30. The policy has been developed to set out clearly in one policy when a Flood Risk Assessment will be required and to incorporate further policy recommendations from the GM SFRA.

4.31. Policy CC2 sets out the need to avoid flood risk; identifies the functional flood plain on the Policies Map; sets out when a site-specific FRA will be required and what the FRA should include.

4.32. The Reasoned Justification explains more about the functional floodplain, application of the Sequential test, other sources of flood risk and liaison with Environment Agency, United Utilities and the Lead Local Flood Authority.

4.33. The main amendments that have been made between Draft Plan stage and Publication Plan stage are outlined in Table 3 above.

Monitoring

4.34. The PfE monitoring framework will help to monitor Policy CC2.

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

- ‘Number of planning permissions approved against EA advice’ regarding flood risk.

Integrated Assessment

4.36. The Integrated Assessment of Policy CC2 resulted in 12 positive / significantly positive scores and 14 neutral scores. No amendments were made to the policy as a result of the IA at Publication Plan Stage. For previous stages of the IA please see the IA report.

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

Policy CC3: Sustainable Drainage – Foul and Surface Water

Summary of evidence

4.38. Policy JP-S4: Flood Risk and the Water Environment Criterion 4 states 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.

4.39. The SFRA shows surface water flood risk which is extensive and Critical Drainage Areas (CDAs) are identified to the west of the borough.

Draft Local Plan consultation and Duty to Co-operate

4.40. The policy was first suggested by United Utilities in response to Issues and Options consultation in 2021. United Utilities recommended that the issues of flood risk and surface water management were dealt with as two separate policies to set a clear process in relation to surface water management for all new development.

4.41. Oldham Council reacted positively to this suggestion drafting Policy CC3 which was amended over time in response to consultation, liaison with the LLFA and new guidance.

4.42. There was general support for the policy at Draft Plan stage (which was Policy CC4 at the time). Respondents requested some amendments, which are summarised in table 4 below.

Table 4: Summary of comments and amendments to Policy CC4: Sustainable Drainage – Foul and Surface Water

Respondent	Summary of Comment	Council Response
Lancashire Wildlife Trust and TFGM	Support policy.	Noted.
Canals and River Trust	Highlight that the Trust own and manage their waterways, and that discharges to their network require their consent and are not guaranteed. Discharges agreements are subject to an assessment of the impact on the management of their water resources, in addition to any commercial agreement. Account of this position would be needed by prospective developers and decision makers when determining how to design surface water drainage from site. Request that the explanatory text includes reference to this, as it would help to	Suggested text has been incorporated into the Reasoned Justification of Policy CC3: *Developers should be aware that surface water discharges to some waterways, including canals owned by the Canal and River Trust, may require the consent of riparian landowners. Developers should ensure that they gain relevant consent(s) as appropriate.*

Respondent	Summary of Comment	Council Response
	make this matter clearer to decision makers and prospective developers at an early stage of development. Suggested text is provided.	
Environment Agency	Schedule 3 of the Flood and Water Management Act 2010 in England is to be implemented in 2024 and will provide a framework for the approval and adoption of sustainable drainage systems into new developments.	Reference to Schedule 3 of the Flood and Water Management Act has been added to the Reasoned Justification of Policy CC3.
Natural England	Wish to see the opportunity for nature-based solutions reflected in the wording of the policy. Treated foul and surface water discharges can have implications to water sensitive designated sites such as Rochdale Canal SAC and Rochdale Canal Site of Special Scientific Interest (SSSI) and peat habitats found within South Pennine Moors SAC, South Pennine Moors Phase 2 SPA and Dark Peak SSSI.	Reference to nature-based solutions added in relation to the four pillars of sustainable drainage in in the Reasoned Justification of Policy CC3. The impact of discharging treated water to surface water has been considered by the HRA and mitigation text added to Policy CC3 as follows: *Any development proposals which have the potential to cause foul and surface water discharges to water-sensitive designated sites should be subject to project-level HRA.*
Lichfields on behalf of Russell LPD	Russell LDP submitted representations in relation to a PfE consultation, which requested splitting JPA2 Stakehill into separate northern and southern allocations. It is appropriate that drainage strategies will come forward individually for the two distinct and separate elements of the allocation, alongside applications for their respective development proposals. Recommend that the following text is included at the start of the second to last paragraph for Policy CC4: "With the exception of some strategic allocations in PfE, which have discrete development parcels…""	For most sites a site wide drainage strategy would be sought. Applications for Stakehill can as part of pre-application discussions discuss how the site is bought forward, with reference to paragraph 11.55 of PfE. However, JPA 2 was not split into northern and southern allocations and has remained as one allocation.
United Utilities	Request site-specific policies are included regarding the approach to	The Local Plan is not allocating any sites anymore therefore

Respondent	Summary of Comment	Council Response
	drainage when allocating a site. Request your site-specific policy clearly states that applicants must make space available in their proposals for multi-functional sustainable drainage. Suggested wording is provided.	site-specific wording not required.

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

4.43. Oldham Council met with United Utilities on 9 July 2025 and at a Joint United Utilities and Environment Agency on 11 July 2025 to discuss the amendments that had been made. A wider discussion took place around the amended hierarchy to reflect non-portable uses and its relationship with discharge rates. It was agreed to discuss the policy with the LLFA and add more detail regarding non portable uses.

4.44. A discussion followed with the LLFA to finalise the policy and more text added in the Reasoned Justification on non-portable uses to provide examples.

Policy Approach

4.45. As stated above a separate policy addressing surface and foul water was requested by United Utilities. The policy has also been developed to set out local drainage standards.

4.46. Policy CC3 sets out that applications will be supported by a strategy for foul and surface water management, taking account of the surface water hierarchy, which is set out. Developments are required to achieve greenfield runoff rates. This includes brownfield sites particularly those within CDAs. The policy sets out policy detail, as advised by PfE Policy JP-S4, on how a relaxation of outflow controls will be considered.

4.47. The policy also sets out what should be considered as part of the drainage strategy and the need for drainage management and maintenance plans.

4.48. The Reasoned Justification provides more detail on the surface water hierarchy and drainage strategies.

4.49. Since Draft Plan stage the main amendments to the policy have been to refer to:

- The surface water hierarchy changing to include collected for non-portable use to reflect changes in national standards for suds[24];

[24] The National standards for sustainable drainage systems is available at: https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems

- Stronger wording on discharge rates for brownfield sites from should aim to achieve greenfield run off rates will be required to ensure that surface water flood risk is addressed effectively.

- Development proposals which have the potential to cause foul and surface water discharges to water-sensitive designated sites should be subject to project-level HRA. This is as a consequence of the HRA.

Monitoring

4.50. Policy CC3 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.

4.51. The Local Plan indicator that will be used to monitor this policy is:

- Number of new developments agreed with the Council incorporating Natural Flood Management (NFM).

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

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

4.53. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy CC3.

Integrated Assessment

4.54. The Integrated Assessment of Policy CC3 resulted in 11 positive / significantly positive scores and 15 neutral scores. No amendments were made to the policy as a result of the IA at Publication Plan Stage. For previous stages of the IA please see the IA report.

4.55. The HRA screened the policy out. However, the HRA recommends that any development proposals which have the potential to cause foul and surface water discharges to water-sensitive designated sites should be subject to project-level HRA. This has been added to Policy CC3.

Policy CC4: Water Efficiency

Summary of evidence

4.56. PfE Policy JP-S4 Flood Risk and the Water Environment states that 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.

4.57. Such a policy is recommended by United Utilities who have provided evidence 'Evidence Submitted by United Utilities Water Limited to Justify the Implementation of the Optional Standard for Water Efficiency in Part G of Building Regulations' (November 2025). See Appendix 1.

4.58. This is summarised in section 3. The Water Resource Management Plan (WRMP) (2024) confirms that the Strategic Resource Zone (SRZ), which Oldham falls within, faces a growing water supply-demand deficit that is projected to significantly worsen without intervention such as water demand reduction measures.

4.59. Viability evidence (2024) confirms the tighter standard incurs no additional cost and can be implemented with a fittings-based approach.

4.60. This policy is justified by national legislation, policy and guidance including the Water Industry Act 1991, NPPF and National Planning Practice Guidance.

Draft Local Plan consultation and Duty to Co-operate

4.61. The policy was first suggested by United Utilities in response to Issues and Options consultation in 2021.

4.62. Oldham Council reacted positively to this suggestion drafting Policy CC4 which was amended over time in response to consultation.

4.63. In response to consultation at Draft Plan stage (the policy was CC5 at the time) clarification was sought on non-residential development and the evidence. Responses are summarised in table 5 below.

Table 5: Summary of comments and amendments to Policy CC5: Water Efficiency

Respondent	Summary of Comment	Council Response
TFGM	Support policy.	Support noted.
Home Builders Federation and Countryside Partnership / Victory Group	A policy requirement for the optional water efficiency standard must be justified by credible and robust evidence. Consider that requirement for optional water efficiency standard is not justified nor consistent with national policy in relation to need or viability and should be deleted.	The justification is provided in Appendix 1.
Lichfields on behalf of Russell LPD	Policy lacks clarity in terms of how applicants for major non-residential developments should comply with it.	Policy amended to require major non-residential developments to achieve five credits for

Respondent	Summary of Comment	Council Response
	Buildings are given an overall BREEAM rating based on the number of credits achieved across a range of categories. Whilst credits can be achieved for water efficiency, that count towards the overall BREEAM score, there are not specific 'excellent', 'very good' standards for water efficiency. The required water efficiency standards for non-residential major development should be listed in the policy, its explanatory text, or an appendix to the plan.	Category Wat 01 of BREEAM unless impracticable. This equates to Very Good / Excellent.
United Utilites	The target measure of water used for BREEAM 'Excellent' and 'Very Good' are the same. As such, the policy should be amended accordingly.	Policy amended to require major non-residential developments to achieve five credits for Category Wat 01 of BREEAM unless impracticable. This equates to Very Good / Excellent.

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

4.65. Oldham Council met with United Utilities on 9 July 2025 and at a joint United Utilities and Environment Agency on 11 July 2025 to discuss the amendments that had been made. A wider discussion took place around updating the evidence to justify the policy.

Policy Approach

4.66. Policy CC4 has been developed to enable higher water standards to be implemented in new developments.

4.67. Policy CC4 requires all new residential developments to achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates.

4.68. Major non-residential development will be required to achieve five credits for category Wat 01 of BREEAM unless demonstrated impracticable.

4.69. The Reasoned Justification outlines the benefits of the policy, and more information on non-residential development requirements.

4.70. The changes between Draft Plan stage and Publication Plan stage are in relation to non-residential development, as outlined above.

4.71. There is not a specific indicator relating to this policy.

Integrated Assessment

4.72. The IA of Policy CC4 resulted in 9 positive / significantly positive scores and 17 neutral scores. No amendments were made to the policy as a result of the IA at Publication Plan Stage. For previous stages of the IA please see the IA report.

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

Policy CC5: Groundwater Source Protection Zones

Summary of evidence

4.74. The Environment Agency defines Groundwater Source Protection Zones (SPZs). Part of Oldham is covered by a SPZ.

4.75. The purpose of SPZs is to provide additional protection to safeguard drinking water quality through constraining the proximity of an activity that may impact upon a drinking water abstraction.

Draft Local Plan consultation and Duty to Co-operate

4.76. The policy was first suggested by United Utilities in response to Issues and Options consultation in 2021.

4.77. Oldham Council reacted positively to this suggestion drafting Policy CC5.

4.78. At Draft Plan stage TFGM and United Utilities supported the policy (which was Policy CC6 at the time). United Utilities also requested that site allocations falling within a SPZ are noted. However, the Local Plan is no longer allocating sites.

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

4.80. Oldham Council met with United Utilities on 9 July 2025, however this policy was not discussed in detail. The Council updated United Utilities with the position regarding site allocations.

Policy Approach

4.81. Policy CC5 has been developed to ensure that Groundwater SPZs are adequately addressed when considering development proposals.

4.82. The policy sets out that applicants are expected to consider the potential impacts on water quality and where necessary include measures to reduce any risk to the water environment. Developments are expected to accord with the latest national guidance on Groundwater Protection. The policy sets out further detail on Risk Assessment, Masterplanning and the Construction Management Plan.

4.83. The Reasoned Justification provides more detail on SPZs and a link to Environment Agency guidance.

4.84. There were no substantial changes between Draft Plan stage And Publication Plan stage.

<u>Monitoring</u>

4.85. Policy CC5 will be monitored by the Local Plan monitoring framework in line with Local Plan Policy M1.

4.86. The Local Plan indicator that will be used to monitor this policy is:

- Number of planning permissions granted contrary to Environment Agency advice on water quality grounds.

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

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

4.88. The monitoring framework is therefore considered to be appropriate to ensure the deliverability of Policy CC5.

Integrated Assessment

4.89. The IA of Policy CC5 resulted in 4 positive / significantly positive scores and 22 neutral scores. No amendments were made to the policy as a result of the IA at Publication Plan Stage. For previous stages of the IA please see the IA report.

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

5. Conclusion

Providing an appropriate strategy

5.1 Policies CC1 to CC5 of the Oldham Local Plan: Publication Plan provide the policy framework for ensuring that we address climate change through providing a policy to support renewable energy and low carbon energy and policies that address flood risk management, water quantity and quality.

5.2 In terms of the test of soundness listed at paragraph 36 of NPPF it is considered that these have been met as follows:

a) **Positively prepared**: the Oldham Local Plan: Publication Plan supports delivery of PfE which provides the strategic direction and context for the borough. The Local Plan sets out how the schemes for renewable and low carbon energy will be assessed which provides a helpful criteria-based policy to support the journey to zero carbon and the policies set out in PfE. The Local Plan sets out more detailed policies on drainage standards and water efficiency which PfE directly encourages. The Local Plan also sets out further policies on flood risk management and groundwater to supplement policies in PfE relating to flood risk and water quality. The flood risk and water quality policies have been developed through working with United Utilities and the Environment Agency. Policy CC1 has also responded to stakeholder feedback including from Natural England.

b) **Justified**: policies CC1 to CC5 provide an appropriate strategy in relation to Addressing Climate Change matters across Oldham. There are further policies relating to climate change in the biodiversity section of the Local Plan. The policies have been informed by stakeholder feedback, particularly United Utilities. The policies are justified by evidence, such as that set out in Apprendix 1, as well as the LAEP, GM SFRA (2019) and Oldham SFRA (2025) and Groundwater SPZ maps.

   The policies help achieve the vision of the Local Plan as they will help Oldham ensure the borough is clean, green and healthy. It's part of the way in which we are responding to the Climate Change emergency and substantially reducing our carbon footprint.

   The policies help implement Plan Objective 7 'Promoting sustainable development that mitigates and adapts to climate change…'.

   The policies help achieve the Oldham Plan and Corporate Plan mission to be Green and Growing, particularly in relation to supporting green technologies.

c) **Effective**: the Oldham Local Plan: Publication Plan supports delivery of PfE which sets out policies on the journey to a carbon neutral city region and on managing flood risk and water quality. The plan period of up to 2039 reflects that of PfE and continued effective joint working arrangements with PfE districts on cross-boundary strategic matters, will support delivery of the joint and local plans.

Finally, deliverability of the Oldham Local Plan: Publication Plan is also evidenced by the Infrastructure Delivery Plan and Statement of Common Ground.

d) **Consistent with national policy**: policies CC1 to CC5 support delivery of sustainable development in accordance with relevant national policy, in particular:

i. by taking full account of climate impacts including water scarcity, storm and flood risks, encouraging the reuse of existing resources; and supporting renewable and low carbon energy and associated infrastructure;
ii. increasing the use and supply of renewable and low carbon energy and heat plans through identifying opportunities and setting policy considerations;
iii. through being informed by a SFRA and applying a sequential, risk-based approach to the location of development; and
iv. helping to improve local environmental conditions such as water quality.

Appendix 1 - Evidence Submitted by United Utilities Water Limited to Justify the Implementation of the Optional Standard for Water Efficiency in Part G of Building Regulations

Evidence Submitted by United Utilities Water Limited to Justify the Implementation of the Optional Standard for Water Efficiency in Part G of Building Regulations

December 2025

Executive Summary

United Utilities Water Limited (UUW) strongly supports the implementation of the tighter water efficiency standard within development plan policy. Whilst the North West is not classified as seriously water stressed, UUW presents compelling evidence that justifies the implementation of this standard based on regional water resource pressures, national policy alignment, and viability considerations.

Within the North West there are 4 resource zones for the supply of water. Oldham Metropolitan Borough falls within the Strategic Resource Zone (SRZ) for water supply. The SRZ which serves 7 million people.

The Planning Practice Guidance (PPG) outlines a range of primary sources of evidence that can be used to justify the implementation of the tighter standard for water efficiency in the construction of new dwellings. The determining evidence is not limited to whether a region falls within an area classified as water stressed. The PPG is clear that there are other sources of primary evidence notably an up-to-date Water Resource Management Plan (WRMP) which can be used to justify the implementation of the tighter standard.

Clear evidence of need: The latest WRMP for UUW, published in 2024 and hereafter referred to as WRMP24, confirms that the SRZ faces a growing water supply-demand deficit that is 52.6 Ml/d in 2025/26 and without new interventions this is projected to reach 314 Ml/d by 2049/50. Therefore, there is primary evidence in the form of WRMP24, which demonstrates the urgency of the need to implement water demand reduction measures now.

Consultation and endorsement: The publication of WRMP24 was the subject of extensive consultation with relevant stakeholders including the Environment Agency. In addition, the Environment Agency has supported the implementation of the tighter standard for water efficiency in other local authorities covered by the SRZ. Similar policies have been adopted in other local authorities in the SRZ including Lancaster, Blackburn, Wirral, and Cheshire West and Chester.

Viability and supply: Recent evidence (Water Ready 2024) confirms that implementing the tighter standard for water efficiency incurs no additional cost and can be implemented using a fittings-based approach. A fittings-based approach is implementable in all dwelling types, i.e., apartments and houses without any consequential cost impact.

In light of the above, UUW recommends that the development plan includes a policy that requires the implementation of the tighter water efficiency standard, which aligns with Oldham's climate and sustainability commitments and its aspirations to travel towards net zero.

1) United Utilities Water Limited (UUW)

UUW is the statutory water and wastewater undertaker for the north west of England, which includes Oldham. UUW is a statutory consultee in the preparation of development plans.

2) Recommended Policy

UUW strongly recommends that the following policy wording is included in the local plan to ensure that the tighter building regulations optional requirement for water efficiency is a requirement in the construction of new dwellings.

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

Non-residential development will be required to achieve five credits for category Wat 01 of BREEAM unless demonstrated impracticable.

The justification for our position is set out below.

3) National Legislation, Policy and Guidance

Water Industry Act 1991

Section 93A of the Water Industry Act 1991 places a duty on every water undertaker to promote the efficient use of water by its customers.

National Planning Policy Framework (NPPF)

The purpose of the planning system is to contribute to the achievement of sustainable development. It identifies three overarching objectives (economic, social and environmental). The efficient use of water is directly linked to these objectives.

Paragraph 162 states that *'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the* ***long-term implications*** *for flood risk, coastal change,* ***water supply****, biodiversity and landscapes, and* ***the risk of overheating from rising temperatures****. Policies should support appropriate measures to ensure the* ***future health and resilience of communities and infrastructure to climate change impacts****....'*

National Planning Practice Guidance (PPG)

For ease of reference and clarity of the policy thresholds for implementing the tighter standard for water efficiency, UUW has extracted the below paragraphs from the PPG Housing: optional technical standards.

> ***'Can local planning authorities require a tighter water efficiency standard in new dwellings?***
>
> *In setting out how the planning system should contribute to the achievement of sustainable development, the National Planning Policy Framework and guidance makes clear this includes planning to provide the high quality housing required to meet the needs of present and future generations, and helping to use natural resources prudently. The Framework's policies expect local planning authorities to adopt proactive strategies to adapt to climate change that take full account of water supply and demand considerations. Early engagement between local planning authorities and water companies can help ensure the necessary water infrastructure is put in place to support new development. See water supply guidance. The local planning authority may also consider whether a tighter water efficiency requirement for new homes is justified to help manage demand.*
>
> *Paragraph: 013 Reference ID: 56-013-20150327*
>
> *Revision date: 27 03 2015*
>
> ***What standard should be applied to new homes?***
>
> *All new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day). Where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.*
>
> *Paragraph: 014 Reference ID: 56-014-20150327*
>
> *Revision date: 27 03 2015*
>
> ***How should local planning authorities establish a clear need?***
>
> *It will be for a local planning authority to establish a clear need based on:*
>
> - *existing sources of evidence.*
> - *consultations with the local water and sewerage company, the Environment Agency and catchment partnerships. See paragraph 003 of the water supply guidance*
> - *consideration of the impact on viability and housing supply of such a requirement.*
>
> *Paragraph: 015 Reference ID: 56-015-20150327*
>
> *Revision date: 27 03 2015*
>
> ***What are the existing sources of evidence?***
>
> *Primary sources of evidence which might support a tighter water efficiency standard for new dwellings are:*
>
> - *The Environment Agency water stressed areas 2021 classification which identifies areas of serious water stress where household demand for water is (or is likely to be) a high proportion of the current effective rainfall available to meet that demand.*
> - *Water resource management plans produced by water companies.*
> - *River Basin Management Plans which describe the river basin district and the pressure that the water environment faces. These include information on where water*

resources are contributing to a water body being classified as 'at risk' or 'probably at risk' of failing to achieve good ecological status, due to low flows or reduced water availability.

In addition to these primary data sources, locally specific evidence may also be available, for example collaborative 'water cycle studies' may have been carried out in areas of high growth.

Paragraph: 016 Reference ID: 56-016-20150327

Revision date: 27 03 2015'

In summary, the PPG states that where there is a clear local need, local planning authorities can set the tighter Building Regulations optional requirement of 110 l/p/d. Implementation should be based on existing sources of evidence; consultation; and consideration of the impact on viability and supply**.**

The PPG is clear that there are a range of pieces of primary evidence that can be used to justify the optional water efficiency standard including:

- the water stressed classification;
- Water resource management plans; and
- River Basin Management Plans. These include information on where water resources are contributing to a water body being classified as 'at risk' or 'probably at risk' of failing to achieve good ecological status, due to low flows or reduced water availability.

As such, the water stressed classification is not the only source of primary evidence which can be used to justify the implementation of the tighter water efficiency standard.

4) Oldham Metropolitan Borough

In the North West, the supply of water is split into 4 resource zones. Oldham is served by UUW for public water supply and falls within the '*Strategic Resource Zone*'. The Strategic Resource Zone (SRZ) covers the majority of the North West (see plan in Appendix 1). It serves around 7 million people. Water to the SRZ is supplied from a large system of river sources and reservoirs linked by aqueducts, plus several groundwater sources. The evidence to support the tighter standard for water efficiency in Oldham is not constrained to simply considering the local needs of Oldham but rather the water needs of the SRZ in its entirety.

5) Evidence

a) The National Framework for Water Resources 2025[1]

The modelling of scenarios of population growth, climate change and environmental sustainability reductions demonstrate that without action, there could be a public water supply deficit of up to 5,000 Ml/d by 2055. It identifies various contributing factors namely:

- Environmental sustainability: '*Reductions in abstraction licences are needed in some catchments to accommodate legal environmental requirements'*;
- An increased population: An increase of 8 million people by 2055;
- Improved resilience to drought: '*By 2040, or earlier, water companies are planning to be resilient to a drought which has a 0.2% chance of occurring in any year'*.
- Climate change: '*The impacts of climate change are already starting to be felt and is likely to have an increasingly bigger impact. There is an urgent need to deliver actions to adapt to the impacts of climate change to protect the environment, improve the resilience of water supplies and to safeguard the economy from future periods of prolonged dry weather and drought.'*

Appendix B[2] confirms a policy demand target of 110 l/p/d for all households in England by 2050.

b) Environment Improvement Plan 2025[3]

This outlines that current trajectories project a shortfall of 5 billion litres of water per day in the UK by 2050. In response it outlines commitments to reduce the use of public water supply per head of population from a 2019 to 2020 baseline by 9% by 31 March 2027 and by 14% by 31 March 2032. It also commits to reduce all household water use to 122 l/p/d by 2038 from a 2019 to 2020 baseline. This compares with average water use in England in 2024/2025 of 136.5 l/p/d[4]. It also proposes to reduce non-household water use by 9% by 2038.

c) Water Stressed Areas – final Classification (July 2013)[5]

This sets out the revised methodology developed by the Environment Agency for the classification of areas of water stress. The primary aim of the revision was to provide evidence on water stress to the Secretary of State for designation of areas in England which could be universally metered under the

[1] The National Framework For Water Resources 2025

[2] Appendix B: results of public water supply water resources modelling: National Framework for Water Resources 2025

[3] Environment Improvement Plan 2025

[4] Water Resources 2024 to 2025: analysis of the water industry's annual water resources performance November 2025

[5] Water Stressed Areas – final Classification (July 2013)

Water Industry (Prescribed Conditions) Regulation 1999 (as amended). Under the Regulations, water companies in areas classified as seriously water stressed need to evaluate compulsory metering alongside other options when preparing WRMPs.

This document identified the UUW area as one experiencing moderate water stress. As such, UUW was not seriously stressed for the purposes of compulsory metering. The document states that '*Even in those areas designated as "not in serious water stress" under the new methodology, there should be some activity to ensure that water is used more efficiently and effectively. Water companies and water users should not disregard the environmental consequences of their abstraction.'*

d) North West River Basin Management Plan (RBMP) (2022 Update)[6]

The RBMP identifies a high percentage of water bodies in the North West as not achieving good ecological status. Section 4.2.5 of the Habitats Regulation Assessment[7] identifies water demand management as a measure proposed to manage the flow and level of water.

e) Water Stressed Areas – 2021 Classification (July 2021)[8]

This confirms which water companies are identified as seriously water stressed. As per the 2013 classification, the principal purpose of the document is to inform the consideration of compulsory metering. It states that '*Local authorities can use the water stress determination to inform whether they can require the tighter standard of 110 litres per head per day in new developments. Otherwise the use of the water stress determination is only to allow water companies to consider compulsory metering in their water resources management plans. It must not be used for other purposes such as development planning or water resources planning.'* It acknowledges that '*Even those areas that have been determined as not seriously water stressed, still experience pressure on water resources.'*

It only classifies local authorities as being either seriously stressed or not seriously stressed. The area of UUW is identified as 'not seriously stressed' for the purposes of compulsory metering. It states, '*We have continued to use the terms 'serious' and 'not serious' as in the classification in 2013 as the determination is solely to indicate the consideration of compulsory metering.*'

f) The Water Resources West (WRW): Water Efficiency in New Homes v2.0[9]

This recognises that the WRW region faces the **second highest pressures on water resources in England**, largely due to population growth. At the same time, the abstraction licences of water companies are being reduced. Page 5 states:

---

[6] North West River Basin Management Plan 2022

[7] River basin management plan for the North West River Basin District HRA

[8] Water Stressed Areas – 2021 Classification

[9] Water Efficiency in New Homes, Water Resources West

'A consequence of the population and housing growth in our region has meant that water companies have been asked to accommodate the new growth, yet at the same time their abstraction licenses are being reduced. Therefore it is vital that water companies support and are supported in initiatives to help get 110 l/p/d in planning policies across local authorities in the region, to help meet their requirement to supply their customers. The water companies in Water Resources West are Dwr Cymru Welsh Water, Severn Trent, South Staffs and United Utilities. In preparing your local plan you should consult with your local water supply company on specific local issues which may influence your decision on whether the 110 l/p/d should be applied, even if the area is not classed as being under 'significant water stress'.' (Underline is UUW emphasis).

g) Places for Everyone

Paragraph 5.39 of Places for Everyone specifically considers water efficiency. It states:

'5.39 Climate change and population and economic growth can put increasing pressure on the available potable water supply for homes and businesses. It is important that water is conserved and efficiently used as much as possible to help build resilience to periods of drought; avoid over abstraction; reduce carbon emissions from water treatment and disposal; and protect river and wetland habitats from degradation. All new homes have to meet mandatory national standard set out in Building Regulations (of 125 litres/person/day). Where there is a clear local need, the government's Housing Optional Technical Standards paragraph 013 and 014 set out that local authorities may also consider tighter water efficiency requirements for new homes (110 litres a day) to help manage water demand. This will be determined through the preparation of district local plans.'

This paragraph reflects the submission of evidence by UUW to the Examination in Public for Places for Everyone, to request the implementation of the tighter optional standard for water efficiency. Subsequent to the Examination of Places for Everyone, it is material to note that:

- UUW has published an updated Water Resource Management Plan 2024 (WRMP2024); and
- updated evidence on the cost of implementing the tighter optional standard for water efficiency is published. See Table 3 of Water Ready A report to inform HM Government's roadmap for water efficient new homes.

Both of these documents are addressed below.

h) United Utilities Final Water Resource Management Plan 2024[10]

The National Planning Practice Guidance is clear that there are a range of pieces of evidence that can be submitted to justify the implementation of the optional standard for water efficiency. It specifically references water resource management plans (WRMPs) as a primary source of evidence to support the implementation of the optional standard for water efficiency in the construction of new homes (see paragraph: 016 Reference ID: 56-016-20150327). UUW has recently published an updated WRMP 2024. Page 74 states:

'Based on our commitments to reduce demand for water, to support water resources resilience and reduce our impact on the environment, we are requesting that all local authorities in our supply area adopt the optional minimum building standard of 110 litres per person per day (lppd) in all new builds. We already incentivise water efficiency in new builds, by offering a 90% reduction in water charges to developers building water efficient homes which include measures to reduce water use to 100 lppd. This scheme was launched in 2018 and initially targeted a standard of 110 lppd, but due to the success of the scheme and to encourage further improvements in water efficiency, we reduced the threshold to 100 lppd in 2021. To date, more than 86,000 plots have been registered with many of these already built, creating savings of £25m for developers. A similar reduction on wastewater charges is available for properties featuring sustainable drainage, and both schemes are still available to developers building homes in the North West.'

WRMPs must be prepared to comply with the latest regulatory guidance. Reflecting the challenges presented by climate change, a key change to the regulatory guidance since our previous WRMP is the requirement to demonstrate resilience to 1 in 500 year droughts by 2039. Previously the requirement was to be resilient to a 1 in 200 year drought. The Environment Agency's Water Resources Planning Guidelines state that WRMPs should consider the supply-demand balance at times when a company's supplies are low, and demand is high. The baseline scenario to be adopted for companies in England should be the Dry Year Annual Average scenario.

WRMPs are also expected to take account of government aspirations for leakage reductions and reductions in per capita consumption (PCC) in their final plans. These are set out in the Environment Improvement Plan 2025 and the National Framework for Water Resources 2025 in which the government targets a reduction in water consumption to 110 l/p/d by 2050.

[10] United Utilities Final Water Resource Management Plan 2024

WRMPs must also align with the relevant regional plan. For UUW, the Water Resources West Regional Plan and associated evidence recommends the implementation of the optional standard for water efficiency (see above).

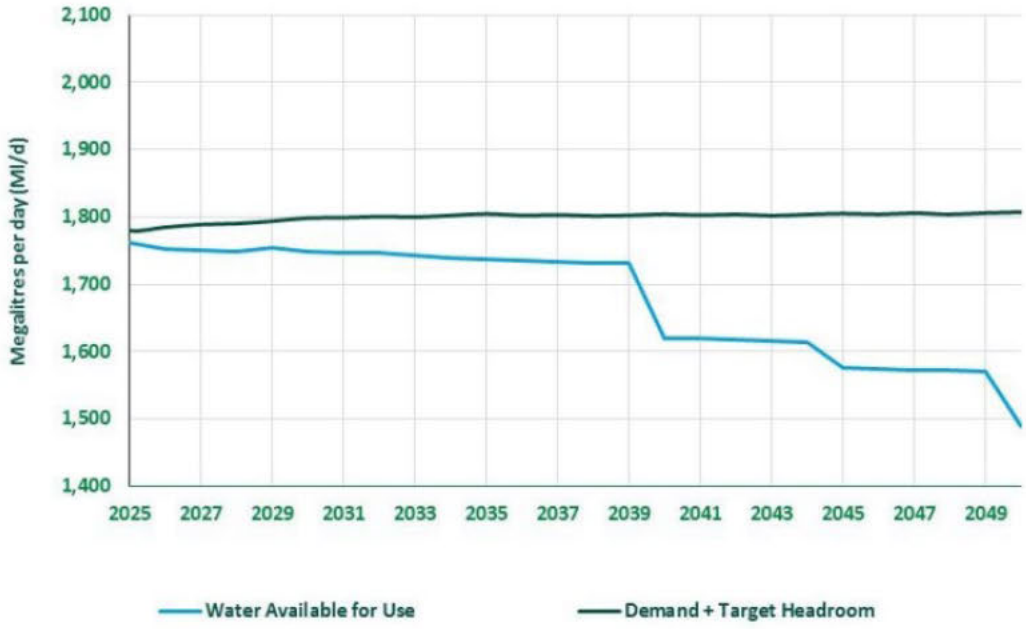
UUW has now published a Final Water Resource Management Plan 2024 (WRMP24) for the period 2025-2050. This sets out the baseline supply-demand balance for water resources, i.e., the difference between the water demanded and the water that can be supplied within the SRZ. It shows that without the drought supply and demand measures included in our drought plan, there is a potential deficit in the SRZ, of 52.6 Ml/d in 2025/26 and without new interventions this rises to 314 Ml/d by 2049/50. This deficit is illustrated in the below table and figures, which are extracted from WRMP24.

Table 14 Summary of baseline dry year annual average supply-demand balance by resource zone[11]

Dry Year Annual Average Supply-Demand Balance (Ml/d) for year:

Resource Zone	2025/26	2030/31	2035/36	2040/41	2045/46	2049/50
Strategic	-52.6	-48.5	-63.9	-180.1	-226.3	-314

Figure 22 Strategic Resource Zone – Dry Year Annual Average Supply-Demand Balance[2]



[11] Water Resource Management Plan 2024 Main Report 2023 (page 57)

The baseline supply-demand balance shown in Table 14 and Figure 22 of WRMP24 confirms that without any interventions, the SRZ faces a deficit such that available supplies are insufficient to meet demand plus target headroom from 2025 onwards. It is a deficit that covers the future development plan period for Oldham and increases over time.

It is relevant to note that these figures were calculated in advance of the latest housing figures for the North West which further increase the North West's annual housing requirement. It is also material to note that the per capita consumption assumed for new properties for the WRMP24 planning period is roughly 110 l/p/d.

The supply-demand balance deficit is not a longer-term problem. It is an immediate problem, which needs to be addressed through a range of interventions now. Without interventions, which include a reduction in leakage and the construction of new dwellings to the tighter standard for water efficiency, the supply-demand balance deficit will worsen and the pressures on the environment will increase.

Based on our commitments to reduce demand for water, to support water resources resilience and reduce our impact on the environment, WRMP24 requests that all local authorities in our supply area adopt the optional minimum building standard of 110 litres of water used per person per day in all new build dwellings. This is similarly stated in the Water Resources West Final Regional Plan and associated evidence (see above).

Importantly, these interventions will increase resilience to climate change, reduce pressure to find new sources of water supply and reduce pressure on the environment. Changes to the flow and level of our water bodies are a water management issue and a key issue to consider in how we respond to the supply and demand deficit. In this context, it is relevant to note that the North West River Basin Management Plan (see above) identifies a high percentage of water bodies as not achieving good ecological status or potential.

i) Water Ready A report to inform HM Government's road map for water efficient new homes (April 2024)[12]

The optional standard is currently set at 110 litres l/p/d. Table 3 of this document confirms that the optional standard for water efficiency can be implemented at no extra cost using a fittings-based approach. It is therefore an approach which is implementable in all dwelling types, i.e., apartments and houses without any consequential cost impact. As such, there should be no concerns about the impact on viability and supply as a result of implementing the optional standard for water efficiency.

[12] Water Ready A Report to Inform HM Goverment's Roadmap for Water Efficiency New Homes

UUW wishes to highlight that this is up-to-date evidence on the cost of implementing the tighter water efficiency standard. Importantly Water Ready was published in April 2024 with contributions from a wide range of developer, industry and supplier representatives.

6) Consultation

Paragraph 015 of the NPPG states that a clear need should be established through consultation with the local water and sewage company, the EA and catchment partnerships. It is material that many of the aforementioned documents, including WRMP24, have been subject to consultation with significant involvement from the EA. It is also material to note that the EA has confirmed its support for the implementation of a tighter water efficiency standard in other local authorities in the SRZ. For example, in the Examination of Places for Everyone and the Examination of the Lancaster Local Plan. See emails from the Environment Agency dated 6 October 2022 and dated 5 September 2022 (Appendix 2).

7) Viability

The above evidence has confirmed that a target per capita consumption of 110 l/p/d can be achieved at no additional cost as such there is no impact on viability or supply.

It is worth noting the wider economic, social and environmental benefits. 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[13]. The Consumer Council for Water notes that the discretionary, tighter (building) standard of 110 l/p/d is something that should be pursued, acknowledging that saving water is not the only driver of water efficiency[14]. Water efficiency has a positive effect on reducing energy bills, water bills of metered customers and carbon emissions thereby reducing environmental impact.

8) Conclusions

When considering whether an area meets the national policy and guidance for applying the tighter standard for water efficiency the key criteria in the PPG relate to:

- evidence of need;
- consultation with other bodies; and
- whether consideration has been given to the impact on viability and housing supply.

[13] Advice on water efficient new homes for England, Waterwise, September 2018

[14] Consultation on measures to reduce personal water use, A Defra consultation paper, Consumer Council for Water Response (October 2019)

The policy threshold is not constrained to the water stress classification.

Based on the policy review, the summarised evidence, the consultation undertaken and the cost of delivering the optional water efficiency standard, implementation of the optional standard is justified and consistent with national policy in the PPG.

Although the SRZ is not within an EA water stressed area for the purposes of compulsory metering, there are other primary sources of evidence which justify implementation not least an up-to-date WRMP, which has been the subject of detailed consultation, including with the EA.

Evidence to support the introduction of the optional standard is included within other pieces of evidence including the WRW evidence and the North West River Basin Management.

There is clear up-to-date evidence that there is no cost to implementing the optional water efficiency standard and therefore no impact on viability or supply.

It is important that the tighter water efficiency standard is adopted to ensure future water availability and supply in line with WRMP24, the WRW evidence, the need to improve water bodies, and reflecting the ambitions set out in the Environment Improvement Plan 2025 and the policy target confirmed in the National Framework for Water Resources 2025. In the face of a supply and demand baseline deficit in the SRZ and a regional and national policy target to reduce consumption to 110 l/p/d in all houses (existing and new build), it would be illogical to construct new houses now which do not contribute to this target. The introduction of the policy will have economic, social and environmental benefits consistent with the purpose of the planning system to achieve sustainable development. Implementing the policy is consistent with the need to respond to the climate emergency and wholly consistent with Oldham Council's Climate Emergency declaration in September 2019. Importantly, application of this approach has added economic and societal benefit by reducing customer bills. There is compelling evidence which meets all the tests of the PPG to justify the implementation of the tighter optional water efficiency standard in the SRZ. This compelling evidence is reflected in the adoption of water efficiency policies in other locations in the SRZ including Lancaster, Blackburn, the Wirral and Cheshire West and Chester. On this basis UUW recommends that the policy wording is included so that the water efficiency requirements for new development are clear and unambiguous.

Geographical locations of our water resource zones

Barepot Resource Zone

Water supply is from a river source, providing non-potable water (that is, water that is not of drinking quality) for industry.

Average supply: about 22 million litres per day

Carlisle Resource Zone

Water supply is from river sources and one reservoir.

Population: about 110,000
Area: 925 km²
Average supply: about 30 million litres per day

Strategic Resource Zone

Water supply is from a large system of river sources and reservoirs linked by aqueducts, plus several groundwater sources.

Population: about 7,170,000
Area: 11,962 km²
Average supply: about 1,794 million litres per day

North Eden Resource Zone

Water supply is mainly from groundwater sources, with a small amount imported from Northumbrian Water.

Population: about 14,000
Area: 925 km²
Average supply: about 7 million litres per day

Former boundary to the West Cumbria Resource Zone

Appendix 2

From: [redacted]
To:
Cc:
Subject: RE: Lancaster Local Plan Policy - Policy DM30b Water Efficiency
Date: 05 September 2022 16:17:49
Attachments: image001.png

Dear [redacted],
Please see our supporting statement below:

Further to our statement that we are satisfied that the Climate Emergency Review of the Local Plan Part One and Part Two are both legally compliant and sound, the following comment sets out our specific support for the inclusion of Policy DM30b.

The Policy requires new dwellings to meet the tighter Building Regulations optional 110 litres/person/day standard. We consider this is fully in compliance with para 153 of the National Planning Policy Framework (NPPF) which requires plans to take a proactive approach to take into account the long-term implications of climate change. National Planning Practice Guidance (PPG) then sets out how local authorities should establish a need for this tighter standard, taking into account existing sources of evidence, and in consultation with the local water company and the Environment Agency.

We recognise that the area covered by Lancaster City Council is not within an Environment Agency-identified 'water stressed area', however this is not the only source of evidence that can be used to support the requirement for the tighter water efficiency standard. We agree with the additional evidence clearly set out by Lancaster City Council in their response to questions relating to Policy DM30b. The introduction of the optional standard into local plan policies is supported both in the North West River Basin Management Plan; and in the National Framework for Water Resources. The local authority area falls within the Water Resources West regional group, which has been identified as having the second highest pressure on water resources in the country, due to population growth, future demand for housing, climate change and environmental protection measures.

The Environment Agency considers that the tighter water efficiency standard will help ensure future sustainable water availability across the region, and should therefore be adopted.

Regards,

[redacted]
Planning Advisor Sustainable Places, Cumbria and Lancashire.
Environment Agency | Ghyll Mount, Penrith 40 Business Park, Penrith, Cumbria, CA11 9BP
[redacted]
Working days: Monday to Thursday

Please accept my thanks for your email in advance, I have made a commitment to stop sending e-mails that just say thank you. This will help me to reduce my carbon footprint
https://carbonliteracy.com/the-carbon-cost-of-an-email/

From: [redacted]
Sent: 01 September 2022 13:15
To: [redacted]
Cc: [redacted]
Subject: RE: Lancaster Local Plan Policy - Policy DM30b Water Efficiency

> You don't often get email from [redacted] Learn why this is important

Dear [redacted]

Have you had chance to consider the below? This is now an urgent matter as we have to submit our statement to the LPA to confirm the evidence to justify the optional water efficiency standard. We have to submit this to the LPA tomorrow. Whilst I note that the attached letter from you confirms you have no objection, it would be helpful if you could confirm that you actively support the introduction of the optional water efficiency standard for new housing in the Lancaster Local Plan.

Is this something which you can consider to support us and the council? There have been objections to the policy from the [redacted]

Please do let me know if you wish to discuss.

Thanks – [redacted]

[redacted]
Planning Manager
Planning, Landscape and Ecology
[redacted]
unitedutilities.com

From: [redacted]
Sent: 25 August 2022 11:32
To: [redacted]
Cc: [redacted]

Subject: RE: Lancaster Local Plan Policy - Policy DM30b Water Efficiency

---

Hello [redacted]

I received your out of office but understand you are back at work this week.

We are working up a response to the above – as per my email below, and wondered if this is something you can provide support for?

I have availability tomorrow if useful to discuss.

Look forward to hearing from you

[redacted]

[redacted]
Senior Planner

Arup
Rose Wharf, 78 East Street
Leeds, LS9 8EE, United Kingdom
[redacted]
arup.com

Follow us
LinkedIn Twitter Instagram YouTube Facebook

From: [redacted]
Sent: 16 August 2022 15:39
To: [redacted]
Cc: [redacted]
Subject: Lancaster Local Plan Policy - Policy DM30b Water Efficiency

Hello [redacted]

I have been passed your contact details by [redacted] from United Utilities.

[redacted] has been asked to support Lancaster Council in responding to objections from the HBF and housebuilders regarding the optional Water Efficiency requirement in Policy DM30b, as part of the Climate Change review of the Local Plan.

We are supporting United Utilities in preparing a response to the examination. I have noted the Environment Agency's response submitted to the Reg19 consultation earlier this year (Your Ref: NO/2012/104361/CS-02/EW1-L01) confirming the EA is satisfied that both DPDs are legally compliant and sound.

If possible, it would be beneficial to include support from the Environment Agency as part of our response to the Inspector's questions specifically on Policy DM30b.

Would we be able to include support from the EA as part of the response?

Kind regards,
[redacted]

[redacted]
Senior Planner

Arup
Rose Wharf, 78 East Street
Leeds, LS9 8EE, United Kingdom
[redacted]
arup.com

Follow us
LinkedIn Twitter Instagram YouTube Facebook

message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

From: [redacted]
To:
Subject: RE: Places for Everyone
Date: 05 October 2022 16:03:45
Attachments: image001.png
image002.gif
image003.gif
image004.gif
image005.gif
image006.gif
image007.gif
image008.png
image009.png

Hi [redacted]

Yes I can confirm this approach is supported.

Thanks

[redacted]

From: [redacted]
Sent: 05 October 2022 15:03
To: [redacted]
Subject: RE: Places for Everyone

Hi [redacted]

Thanks for the email. Can I just confirm that the EA do specifically support the implementation of the optional standard in Building Regs for water efficiency?

Thanks – [redacted]

[redacted]
Planning Manager
Planning, Landscape and Ecology
[redacted]
unitedutilities.com

From: [redacted]

Sent: 05 October 2022 12:26
To: [redacted]
Subject: RE: Places for Everyone

Hi [redacted]

Thank you for your email.

In response to the matters raised I would firstly like to clarify the Environment Agency's current position with regards to the Places for Everyone (PfE) Joint Development Plan Document. As it stands, we consider the plan to be legally sound and compliant under the National Planning Policy Framework for issues within our remit.

Referring to Policy JP-S 5 and requirement 8, we acknowledge that the intention of the policy approach is to set a strategic framework on which district Local Plans can set out more specific detail. As such, and without reference to specific standards, this requirement would seem to be reliant on Greater Manchester seeking to implement the national standards for water efficiency until subsequent Local Plans are able to adopt a stricter approach.

The National Planning Practice Guidance on optional technical standards for housing is clear that the planning system should contribute to the achievement of sustainable development which includes using resources wisely. Subsequently it outlines that all new homes will have to meet the national standards for water efficiency unless there is a clear local need for the tighter optional requirements of 110 litres/person/day. Paragraph 15 then sets out how local authorities should establish a need for this tighter standard, taking into account existing sources of evidence, and in consultation with the local water company and the Environment Agency as well as considering the impact on viability.

In reference to the existing sources of evidence listed by the NPPG to justify tighter optional requirements, we recognise that the districts within Greater Manchester are not within an Environment Agency 'water stressed area' based on the most recent 2021 classifications. However this is not the only source of evidence to support tighter standards and as noted in your response, there is specific reference in the North West River Basin Management Plan (2019) and in the National Framework for Water Resources (2020). The National Framework also identifies that the area of Greater Manchester falls within the Water Resources West regional group, which has been identified as having the second highest pressure on water resources in the country, due to population growth, future demand for housing, climate change and environmental protection measures.

In conclusion, the Environment Agency considers that tighter water efficiency standards will help ensure future sustainable water availability across the region and to meet the objectives within the National Framework for Water Resources. Whether or not there is sufficient justification to set this within the current PfE submission document and/or achieved through specific policies within subsequent Local Plans will be a matter for the GMCA/Planning Inspectorate to consider

during the forthcoming plan examination process.

Happy to discuss further if needed.

Kind regards

[redacted]

[redacted]
Strategic Planning Specialist, Sustainable Places Team
Environment Agency | Richard Fairclough House, Knutsford Road, Warrington, WA4 1HT

[redacted]

[redacted]

From: [redacted]
Sent: 04 October 2022 20:43
To: [redacted]
Subject: RE: Places for Everyone

> You don't often get email from [redacted] Learn why this is important

Hi [redacted]

I just wondered if there was any update on this?

I'm mindful that I need to submit by midday on Thursday.

I'll be busy tomorrow morning but should be available in the afternoon if you wish to discuss.

Thanks – [redacted]

[redacted]
Planning Manager
Planning, Landscape and Ecology
[redacted]

unitedutilities.com

From: [redacted]
Sent: 03 October 2022 18:05
To: [redacted]
Subject: RE: Places for Everyone

Hi [redacted]

Thanks for your time earlier.

The draft statement is attached. I've also attached the example email from your colleague [redacted] following the completion of a similar exercise for Lancaster earlier this year.

Please note the highlighted sections in the statement. When drafting this, I was hoping that you would be able to support our position but clearly this email is with a view to clarifying the EA's position in GM. I do hope the statement is sufficient to gain your support. It feels like the evidence has moved on since the matter was first considered in the early stages of the GMSF.

Do let me know if you wish to discuss further. The deadline for submission is midday on Thursday so I'm keen to finalise the statement asap.

Thanks again.

[redacted]

[redacted]
Planning Manager
Planning, Landscape and Ecology
[redacted]
unitedutilities.com

From: [redacted]
Sent: 30 September 2022 15:47
To: [redacted]
Subject: Places for Everyone

Hi [redacted]

Hope you are well.

I am just preparing a written statement to Places for Everyone reading for next week.

We will be submitting a statement relating to the need for water efficiency to be more explicitly defined by inclusion of the optional housing water efficiency standard.

I wondered if this is something which the EA would be able to confirm as a actively supporting in Greater Manchester. This may be something on which you have already commented.

Thanks – [redacted]

[redacted]
Planning Manager
Planning, Landscape and Ecology
[redacted]
unitedutilities.com

If you have received a great service today why not tell us?
Visit: unitedutilities.com/wow

Business Park, Lingley Green Avenue, Great Sankey,
Warrington, WA5 3LP
Registered in England and Wales. Registered No 6559020

www.unitedutilities.com
www.unitedutilities.com/subsidiaries

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.