

By email only: spi.consultations@oldham.gov.uk

Your ref:

Our ref:

Date: 24-JUL-26

Dear Sir / Madam

SADDLEWORTH NEIGHBOURHOOD PLAN (REGULATION 16) CONSULTATION RESPONSE

Thank you for consulting United Utilities Water Limited (U UW) on the Submission Version of the Saddleworth Neighbourhood Plan (NP). U UW welcomes the opportunity to comment on the emerging NP. As the statutory water and wastewater undertaker, we are committed to working proactively with local planning authorities (LPAs) and neighbourhood groups to support the delivery of sustainable growth, environmental improvement and climate resilience. We aim to proactively identify future development needs and share relevant information to:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

U UW wishes to highlight the benefits of early and constructive engagement with the Council, neighbourhood groups and site promoters to support a coordinated approach to the delivery of sustainable growth.

We encourage the LPA and Saddleworth Parish Council to direct developers to our **pre-application service** to discuss proposals and identify any potential constraints at an early stage by contacting:

Website (including 'Live Chat'): [Building & Developing - United Utilities](#)

Telephone [REDACTED]

Email:

WATER (water mains, supply and metering): DeveloperServicesWater@uuplc.co.uk

WASTEWATER (public sewers and drainage): SewerAdoptions@uuplc.co.uk

SLUDGE PIPELINES: DeveloperServicesWater@uuplc.co.uk

U UW is pleased to note that climate change is identified within the NP as a cross-cutting theme and is embedded throughout the document. We strongly support this approach. Climate change adaptation and resilience should be a '*golden thread*' running through all aspects of plan-making and decision-taking, ensuring that new development responds positively to the challenges associated with flooding, water resources, extreme weather events and carbon reduction.

Given the strategic importance of climate change to the long-term future of Saddleworth, UUW considers that there are opportunities for a number of minor amendments which would strengthen the Plan and ensure that water management, climate resilience and infrastructure delivery are appropriately recognised.

Vision

UUW supports the Vision and, in particular, the references to sustainable development, supporting infrastructure and the protection of the natural environment. To further reflect the importance of climate adaptation and resilience, UUW recommends the following additional wording:

‘Saddleworth will be a climate resilient Parish where development is planned and delivered in a manner that embraces the challenge of climate change. New development will be designed to reduce flood risk, support sustainable water management, protect water resources and contribute towards a resilient natural environment for future generations.’

Policy 3 – Protected Spaces

Saddleworth contains significant areas of land used for public water supply catchment purposes. These catchments play an important role in protecting water quality and water resources. UUW recommends that this policy includes the following additional wording:

‘Development proposals within or affecting land used for public water supply catchment purposes must demonstrate that they will not adversely affect water resources, water quality or the operation of public water supply infrastructure. Applicants should engage with the relevant water undertaker where proposals are located within water supply catchment areas.’

Policy 4 – Local Green Spaces

UUW notes that some Local Green Spaces contain underground water and wastewater infrastructure. To ensure sufficient flexibility for future infrastructure investment, we recommend the following supporting text:

‘The designation of Local Green Spaces should not prejudice the operation, maintenance, upgrading or expansion of existing water and wastewater infrastructure where such investment is required to meet growth needs, environmental obligations or statutory duties.’

Policy 6 – Conversion of Agricultural Buildings

As noted above, parts of Saddleworth include water catchment land used for public water supply purposes. UUW recommends the following additional wording to this policy:

‘Where agricultural buildings are located on land used for public water supply catchment purposes, applicants must demonstrate that the proposal would not adversely affect water resources, water quality or the operation of public water supply infrastructure.’

Policy 8 – Erosion and Flooding

UUW strongly supports the policy but considers that greater emphasis should be given to multifunctional Sustainable Drainage Systems (SuDS) and flood resilient design. We recommend the following additional wording:

‘Development proposals should incorporate multifunctional Sustainable Drainage Systems which contribute towards water quantity management, water quality improvements, biodiversity enhancement and amenity benefits.

Applicants must demonstrate that development has been designed to be resilient to flood risk through careful consideration of existing and proposed ground levels, finished floor levels, exceedance flow routes and detailed drainage design.’

These additions would complement the existing policy and reflect best practice in sustainable water management.

Policy 9 – Sustainable Construction

UUW recommends that the policy includes reference to water efficiency. Our suggested wording is:

‘Development proposals should incorporate measures to promote the efficient use of water resources. New residential development should achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future replacement standard. Major non-residential development will be required to achieve five credits for category Wat 01 of BREEAM unless demonstrated impracticable.’

This aligns with the emerging Oldham Local Plan approach.

Policy 11 – Design Masterplans

UUW supports the requirement for masterplanning and integrated site design. We recommend the following additional requirement:

‘Masterplans shall demonstrate a holistic and coordinated approach to infrastructure planning, design and delivery, including water supply, wastewater infrastructure, surface water drainage and wider green and blue infrastructure.’

Policy 12 – Chew Brook Vale

UUW supports the requirement for development to be informed by a flood risk assessment. However, UUW has previously raised concerns regarding incorrect reservoir flood risk information in the Greater Manchester Level 2 Strategic Flood Risk Assessment for Chew Brook Vale. As such, we would welcome recognition of the need for ongoing engagement with the reservoir undertaker. We request the inclusion of the following wording:

‘Development proposals and the requisite flood risk assessment must be informed by engagement with United Utilities as reservoir undertaker to ensure that the latest available information relating to reservoir flood risk and water infrastructure considerations are taken into account.’

Policy 18 – Community and Self Build

UUW supports the principle of community-led and self-build development, however, to avoid fragmented infrastructure delivery, we recommend the following additional wording for inclusion in the policy:

‘Community-led and self-build housing proposals must be delivered in accordance with site-wide infrastructure and drainage strategies to ensure a coordinated approach to infrastructure provision and sustainable development.’

Policy 29 – Air Quality and Vibration Monitoring

UUW recommends that the policy also reflects the ‘agent of change’ principle in the National Planning Policy Framework. Our recommended additional wording is:

‘Development proposals shall be located and designed to ensure that existing businesses, infrastructure and operational facilities, including wastewater treatment works and other utility operations, are not subject to unreasonable restrictions as a result of new development. Where necessary, applicants will be required to provide appropriate assessments and any necessary mitigation to demonstrate that any proposal will be acceptable in accordance with the ‘agent of change’ principle.’

Conclusion

UUW is supportive of the overall direction of the Saddleworth NP and particularly welcomes the recognition of climate change as a cross-cutting theme. The amendments suggested above are relatively minor and seek to strengthen the Plan's approach to climate resilience, sustainable water management, infrastructure delivery and protection of public water supply resources whilst avoiding duplication of emerging strategic policy within the draft Oldham Local Plan.

We trust these comments are helpful and would be pleased to continue engaging with Saddleworth Parish Council and Oldham Council as the NP progresses. If you have any queries or would like to discuss this representation, please do not hesitate to contact me at planning.liaison@uuplc.co.uk.

Yours faithfully

Andrew Leyssens MRTPI
Asset Management
United Utilities Water Limited