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Oldham Local Plan Examination
Matters, Issues and Questions – Matter 10

Matter 10 – Climate Change Policies

Issue 14: Does the Plan set out a positively prepared strategy and policies (Policies CC1 to CC5) for climate change which is justified, effective and consistent with national policy?

Policy CC1

Q10.1 Is Policy CC1 justified and consistent with national policy?

Q10.2 Are the requirements of Policy CC1 sufficiently clear and understandable for decision makers and applicants, particularly with regard to how it applies to developments of different types and scale, and is the policy effective as a result?

Policy CC2

Q10.3 Is Policy CC2 justified and consistent with national policy?

Q10.4 Are the requirements of Policy CC2 sufficiently clear and understandable for decision makers and applicants, and is the policy effective as a result?

Policy CC3

Q10.5 Is Policy CC3 justified and consistent with national policy?

Q10.6 Are the requirements of Policy CC3 sufficiently clear and understandable for decision makers and applicants, and is the policy effective as a result?

Policy CC4

Q10.7 Is the requirement for all new residential developments to achieve the Building Regulations optional requirement for water efficiency justified and consistent with national policy?

1. As outlined in our Regulation 19 representations, to move to the optional requirement for water efficiency contained in Part G2 of the building regulations (110 litres per person per day), the Council need to justify this with reference to the criteria found in the PPG.

2. The PPG (Reference ID: 56-016-20150327) is clear on the evidence needed for local planning authorities to justify a move to the higher water standard. These are:

    - Whether the area falls into the Environment Agency water stressed areas (from its 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.

3. The Council correctly highlights in their Addressing Climate Change Topic Paper (January 2026) [CC01] that Oldham does not lie within an area of water stress and so on this basis, the optional requirement cannot be justified.

4. Nevertheless, it does highlight that United Utilities have undertaken a Water Resource Management Plan (WRMP, 2024) which notes that the region may act as a water exporter to more stressed regions by 2050 (which his beyond this plan period). If the region is able to be a water exporter by this time, then the area cannot be said to be lacking in future water supply. Furthermore, whilst the WRMP commits United Utilities to reducing leaks to 2050, it is only committing to halving the number of leaks. This will still leave a substantial loss of water through its existing infrastructure which could be addressed rather than placing additional burdens on the development industry.

5. Indeed, the mandatory level of water efficiency contained in Part G1 of the building regulations is 125 litres per person per day. This in itself is a higher standard than that achieved by much of the existing housing stock. This mandatory standard already represents an effective demand management measure.

6. Consequently, whilst the HBF understands the objectives and desirability to move to a tighter water efficiency standard, it does not consider that the evidence submitted justifies this in line with the PPG.

Q10.8 Is the BREEAM requirement for major non-residential development justified and consistent with national policy?

Policy CC5

Q10.9 Is Policy CC5 justified and consistent with national policy?
Q10.10 Are the requirements of Policy CC5 sufficiently clear and understandable for decision makers and applicants, and is the policy effective as a result?

Q10.11 Are the Groundwater Source Protection Zones clearly set out on the Policies Map, to allow for Policy CC5 to be implemented effectively?

Overall

Q10.12 Are the policies in Chapter 12 of the Plan otherwise positively prepared, justified, effective and consistent with national policy?

Q10.13 Are any Main Modifications required to ensure the policies are sound?

7. In line with our comments made in relation to Q10.7, the requirement for the optional water efficiency measure (110 litres per person per day) should be deleted from Policy CC4.