

Appendix 1

**Pre-Application Advice
2022, 2023 and 2025**

Appendix 2 (Update – August 2024)

Sequential Test & Exception Test

1 SEQUENTIAL TEST

1.1 The application site area extends to approximately 1 hectare. The proposed replacement college building is a 'More Vulnerable' use and under PPG it is an acceptable use in flood zones 1 and 2, and also in zone 3a if the Exception Test has been followed and met.

1.2 Due to update to the flood mapping since preparation of the planning application the site (red line) is now within Flood Zones 2 and 3, previously only Zone 2, and therefore we are now updating the Sequential Test and Exception test to meet Environment Agency comments received on 14th August 2025 and its further comments on 8th September 2025.

1.3 NPPF paragraph 174 seeks to steer all development sequentially to areas of the lowest flood risk of flooding from any sources. It continues:

'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.'

1.4 PPG provides further guidance on application of the sequential test to the location of development and planning applications. PPG para ID: 7-024 states on the location of development:

'The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites:

- *Within medium risk areas; and*
- *Then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.'*

1.5 PPG para ID: 7-027 advises that:

'In applying [NPPF] paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied.'

1.6 PPG para ID:7-027a continues with advice that:

‘For individual planning applications subject to the sequential test, the area to which the test needs to be applied will be governed by local circumstances relating to the catchment area for the type of development proposed and the needs it is proposing to address. The catchment area should always be appropriate to the nature and scale of the proposal and the settlement it is proposed for.

...

‘... where there are large areas in Flood Zones 2 and 3 (e.g. coastal towns and settlements on major rivers) and development is needed in those areas to sustain the existing community, sites outside them are unlikely to provide reasonable alternatives.

- 1.7 PPG para. ID 7-28 considers a ‘reasonable available’ site for purpose of the sequential test to be a;

‘... location [that] is suitable for the type of development proposed, they are able to meet the same development needs and they have a reasonable prospect of being developed at the same time as the proposal.’

- 1.8 Drawing the points above together the application site and the existing college campus is located in Rochdale town centre alongside the River Roch, a major river. The existing campus will retain Block A in the development and will function as a whole with the replacement Block B subject to the development proposals. It is therefore quite apparent that no other location or site will be capable of providing the need the development serves, i.e. investment in to the renewal of the educational facilities of the college to meet the future needs of the students at the college.

- 1.9 Following PPG it is unnecessary to consider any other sites to locate the development proposal under the sequential test. As the site is identified as both Flood Zone 2 and 3 it is necessary to then apply the Exception Test for a ‘More Vulnerable’ use.

Exception Test

- 1.10 NPPF paragraphs 178 & 179 state:

‘178. 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.

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

- 1.11 PPG para. ID 7-036 provides advice and examples of how part (a) can be demonstrated to show wider sustainability benefits of the proposals, such as re-use of suitable brownfield land. Benefits are to be weighed against any site-specific flood risks, and consider the flood risk on social, economic and environmental factors.
- 1.12 The technical aspect of the exception test is informed by the Flood Risk Assessment prepared by Roscoe. This has been revised following Environment Agency comments received up to 8th September 2025.
- 1.13 Regarding part (a) we can record that the proposed development will provide substantial community benefits that clearly outweigh the flood risk. Those benefits include:
 - Replacing the existing Block B teaching building which has reached the end of its useful life and does not provide a quality learning environment or facilities necessary for modern education needs
 - Providing a new building that will deliver modern teaching and learning facilities, including new workshops, lecture hall studios and kitchen facilities to cover a broad range of studies and vocational training opportunities
 - Supporting improved education and training outcomes over the long-term for the wider community through the investment in new facilities
 - A building that is modern, energy efficient, including renewable energy generation, meets daylight, thermal and ventilation requirements for a better environment for students and staff
 - Provide through the phasing of development the delivery of the new building without reducing courses at the college during construction, maintaining education and training to the community
 - Provide new external space (location of existing Block B) for staff and students as a new facility to improve the wider environs of the campus
 - Support Biodiversity Net Gain with improvement to the ecological value of the site
 - Support to construction work, training and apprenticeships for local residents
 - Providing a first step to the full redevelopment of the college campus and Block A

On part (b) the updated Flood Risk Assessment, prepared by Roscoe, demonstrates compliance with the requirement that 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*. Specifically, it set out that based on the expected flow paths and the general flood map for planning, the lowest risk area of the site is anticipated to be in the northern side of site. This area is designated as flood zone 2 on the current flood map for planning, indicating

the lowest flood risk and shallowest flood depths across all scenarios. Additionally, the proposed drainage has been modelled to not flood for every storm up to and including the critical 1 in 100 years plus climate change event. Furthermore, flood resilience measures will be incorporated to mitigate surcharges in extreme events, this includes:

- Raised electrical sockets, wiring and services above predicted flood levels,
- Non-return valves on drainage and sewer connections,
- Sealing of entry points for pipes and ducts to reduce water ingress,
- Provision of safe access and egress routes during flood events,
- Preparation of a flood evacuation plan for site occupants.

Therefore, 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. The following FRA has been carried out to satisfy the second condition.

1.14 We can therefore conclude that the application proposals pass the Exception Test as required by NPPF.