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Flood Risk Exception Test

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Application Site

Mitchell Mill,
College Road,
OL12 6AE

Application Details:

Change of use of part property from B2 & B8 to 'E', Light Industrial (highlighted in light green)

Includes New staircase to elevation D and new first floor window to elevation.

This report takes into account the particular
Instructions and requirements of our client.
It is not intended for and should not be relied
Upon by any third party and no responsibility
Is undertaken to any third party.

Job number 115a-WM

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1.0 INTRODUCTION

1. The National Planning Policy Framework (NPPF) requires that Local Plans should be supported by a Strategic Flood Risk Assessment (SFRA) and to include policies to manage flood risk from all sources. It also states that Local Plans should apply a sequential, risk based approach to the location of development.

2.0 SEQUENTIAL AND EXCEPTION TESTS

1. The Sequential Test is used to ensure that areas at little or no risk of flooding are developed in preference to areas of higher risk. The NPPF requires that, if following the application of the Sequential Test, it is not possible for development to be located in lower risk zones then the Exception Test must be applied where development is more vulnerable to flooding.
2. The Planning Practice Guidance (PPG) defines each flood zone as noted in Table 1 below.

Flood Zone	Description
Flood Zone 1 – low probability	The zone comprises land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)
Flood Zone 2 – medium probability	This zone comprises land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% - 0.1%), or between a 1 in 200 and 1,000 annual probability of sea flooding (0.5% - 0.1%) in any year.
Flood Zone 3a – high probability	This zone comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.
Flood Zone 3b – the functional floodplain	This zone comprises land where water <i>has</i> to flow or be stored in times of flood.

Table 1: Flood Zones

3. Following application of the Sequential Test, Planning Practice Guidance (PPG) also identifies the circumstances when the Exception Test should be applied. As an example, where housing (a more vulnerable use) is proposed on a site that is located within Flood Zone 3a, then the Exception Test should be applied.
4. Table 2 below demonstrates when the Exception Test should be applied. The definition of the vulnerability of development is identified within Table 3.

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a	Exception Test required	✗	Exception Test required	✓	✓
Zone 3b	Exception Test required	✗	✗	✗	✓
Key:					
✓ Development is appropriate					
✗ Development should not be permitted					

Table 2: Flood risk vulnerability and flood risk 'compatibility'

Vulnerability Classification	Description
Essential Infrastructure	- Essential Transport infrastructure (including mass evacuation routes) which has to cross the area at risk. - Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood. - Wind turbines.
Highly Vulnerable	- Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding. - Emergency dispersal points. - Basement dwellings. - Caravans, mobile homes and park homes intended for permanent residential use. - Installations requiring hazardous substances consent.

More Vulnerable	- Hospitals - Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels. - Buildings used for dwelling houses, student hall of residence, drinking establishments, nightclubs and hotels. - Non-residential uses for health services, nurseries and educational establishments. - Landfill and sites used for waste management facilities for hazardous waste. - Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.
Less Vulnerable	- Police, ambulance and fire stations which are not required to be operational during flooding. - Buildings used for shops, financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the 'More Vulnerable' class; and assembly and leisure. - Land and buildings used for agriculture and forestry. - Waste treatment (except landfill and hazardous waste facilities). - Minerals working and processing (except for sand gravel workings). - Water treatment works which do not need to remain operational during times of flood. - Sewage treatment works, if adequate measures to control pollution and manage sewage flooding events are in place.
Water Compatible Development	- Flood control infrastructure. - Water transmission infrastructure and pumping stations. - Sewage transmission infrastructure and pumping stations. - Sand and gravel working. - Docks, marinas and wharves. - Navigation facilities. - Ministry of Defence installations. - Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location. - Water based recreation (excluding sleeping accommodation). - Lifeguard and coastguard stations. - Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms. - Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.

Table 3: Flood risk vulnerability classification.

5. The There are two elements to the Exception Test as set out below. Both elements need to be passed for a site to be allocated for development in the District Plan.

- The development must provide wider sustainability benefits that outweigh the flood risk informed by a Strategic Flood Risk Assessment; and
- It must be demonstrated that the development will be safe for its lifetime. This should be informed by a Level 2 Strategic Flood Risk Assessment. Flood warnings and evacuation issues therefore need to be considered in the design and layout of planned developments, in particular through a site specific Flood Risk Assessment (FRA).

3.0 SITE SELECTION.

1. The tables below that follow identify how the Sequential Test, and where necessary the Exception Test, has been applied.

Sequential test	
Site	Mitchell Mill, College Road, Rochdale
Allocation	Employment, Substances
Flood Zone	2
Highest vulnerability of proposed use	Highly Vulnerable
Reasonable alternative site/s available in same or lower flood zone?	No. The majority of the site (60%) is not located within any Flood Zone. Around 20% is located within Zone 2. This is a key brownfield site and there are no reasonable alternatives in the area. This site is the only other available brownfield site and that is also proposed for allocation.
Exceptions test	
It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk.	There are very few brownfield sites in the District that are available for re- development. It is also in a key location within the town centre. Re-development of the site will provide much needed national and international business to the area, but will also facilitate the delivery of new employment space which will provide wider sustainability benefits.
Is must be demonstrated that the development will be safe for its lifetime taking into account the vulnerability of its users.	A small percentage of the existing property will be located within Flood Zone 2. A small area on the south western section. A Flood Risk Assessment will therefore be required.
Summary	
	It is considered that there are no reasonable alternatives to this site within lower flood zones A Flood Risk Assessment will be required at the planning application stage as development will occur in Flood Zone 2. It is also considered that the site passes the Exceptions Test. In masterplanning the site, consideration should be given to the location of the watercourse and the associated Flood Zones.

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