

Oldham Local Plan

Oldham Strategic Flood Risk Assessment

Update for Oldham Local Plan - Publication Plan

January 2026



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1. Introduction

1.1 This report provides an updated Strategic Flood Risk Assessment (SFRA) to support the Oldham Local Plan: Publication Plan.

1.2 Oldham's Joint Core Strategy and Development Management Policies Development Plan Document (DPD) was adopted on 9 November 2011.

1.3 Since then work started on [Places for Everyone](#) (PfE)¹. PfE is the joint development plan of nine Greater Manchester local authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford, and Wigan) dealing with strategic planning issues including jobs, homes, transport, and natural environment.

1.4 All nine authorities adopted the PfE Plan and PfE became part of the statutory development plan for each of the nine PfE authorities, on 21 March 2024.

1.5 PfE does not cover everything that a Local Plan would cover and therefore there is still a need to produce a Local Plan for Oldham. This gives us the opportunity to ensure that we are addressing issues that are specific to Oldham, that matter to our residents and businesses and provide a positive local planning framework to address those issues. The Local Plan is required to be in general conformity with PfE.

1.6 In addition, [National Planning Policy Framework](#)² (NPPF) (December 2024, as amended in February 2025) sets out how the Government's planning policies and how these should be applied. It states that preparing and maintaining up to date plans should be seen as a priority in meeting this objective. As the Core Strategy was adopted in 2011 it is timely to carry out a review of the Local Plan.

1.7 Oldham's Local Plan will guide development in the borough up to 2039. It will replace the Core Strategy and any saved [Unitary Development Plan](#)³ (UDP) policies that have not been superseded by PfE.

1.8 Underpinning the Plan will be the principles of sustainable development, it will meet the needs of Oldham and its residents while also achieving high-quality design, addressing climate change and increasing accessibility for all.

1.9 Oldham's Local Plan will apply to the whole borough, except for that part of the borough that is the planning responsibility of the Peak District National Park Authority.

1.10 It is essential that the Local Plan review helps to achieve sustainable development, in this context it is essential that flood risk is taken onto account.

1.11 PfE was supported by a Level 1 and Level 2 SFRA. Some of the modelling and mapping is still relevant from this SFRA. However, changes to flood risk maps for planning nationally with regards to flood zones and surface water flood risk including climate change has meant that an updated SFRA is required.

¹ 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 NPPF is available at https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

³ The Saved Unitary Development Plan Policies is available at https://www.oldham.gov.uk/info/201229/current_local_planning_policy/1005/saved_unitary_development_plan_policies

1.12 Although an updated SFRA is required the scope of the Local Plan is that it is providing non-strategic planning policies to support PfE and does not allocate any sites for development. The Sequential Test has been applied to the Council's housing and employment land supply to ensure sites are appropriate (that is, deliverable and developable). This result of this is shown in a separate appendix (Appendix 1).

2. National Context

2.1 National Planning Policy Framework (NPPF) states that strategic policies should be informed by a SFRA.

2.2 Development should not be allocated or permitted if there are reasonable available sites appropriate for the proposed development in areas with a lower risk of flooding. The SFRA will provide the basis for applying this test.

2.3 [Planning Practice Guidance](#)⁴ on flood risk (updated September 2025) explains that a SFRA is a study carried out by one or more local authorities or other strategic policy-making authorities to assess the risk to an area from flooding from all sources, now and in the future, taking account of the impacts of climate change, and to assess the cumulative impact that land use changes and development in the area will have on flood risk. It identifies opportunities to reduce the causes and impacts of flooding and gathers information on the land that is likely to be needed for flood risk management infrastructure.

2.4 A SFRA should be used to inform the sustainability appraisal of the Local Plan, so that flood risk is fully considered and to apply the Sequential Test and, where necessary, the Exception Test when determining land use allocations.

2.5 NPPF states that all plans should apply a sequential, risk-based approach to the location of development – considering 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.

2.6 The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source.

2.7 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.

⁴ Planning Practice Guidance on flood risk is available at <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

2.8 Having applied the sequential test, if it is not possible for development to be located in areas with a lower risk of flooding (considering 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.

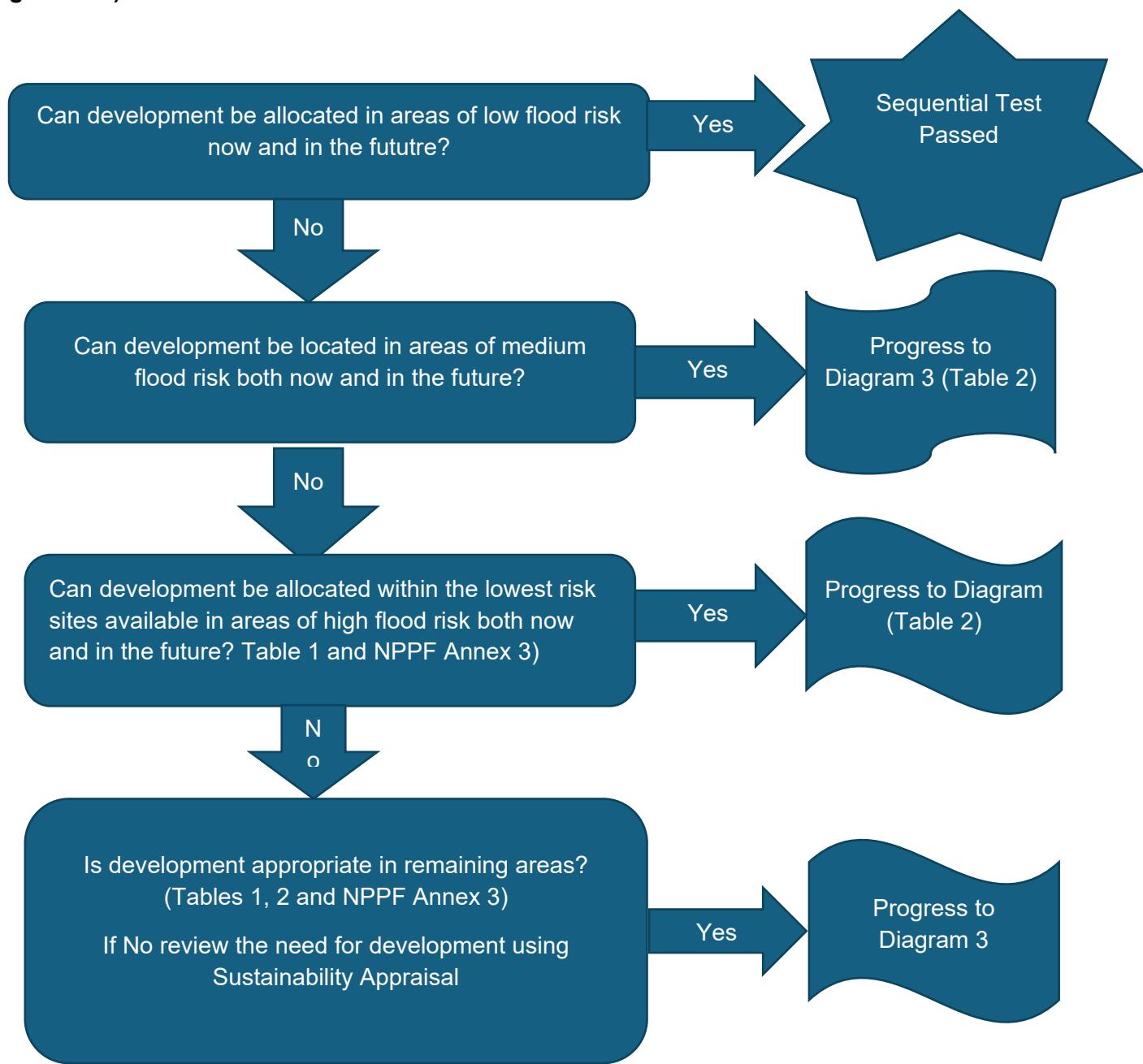
2.9 For Local Plans the application of the exception test should be informed by a strategic flood risk assessment. To pass the exception test it should be demonstrated that:

- 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.

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

2.11 Figure 1 below outlines how the Sequential Test should be applied to plan preparation.

Figure 1: Application of the Sequential Test for plan preparation (planning practice guidance)



2.12 Figure 2 below shows when an Exception Test would be required after having applied the Sequential Test.

2.13 NPPF Annex 3 outlines the Flood risk vulnerability classification. Buildings used for dwelling houses are 'More vulnerable' and most employment uses such as offices, general industry, storage and distribution are considered to be 'Less vulnerable'.

Figure 2: Flood risk vulnerability and flood zone 'incompatibility'

Flood Zones	Flood Risk Vulnerability Classification	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1		✓	✓	✓	✓	✓
Zone 2	Exception Test required	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	X		Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓ *	

Key:

✓ Exception test is not required

3. Greater Manchester Strategic Flood Risk Assessment

3.1 The Greater Manchester Level 1 Strategic Flood Risk Assessment (GM Level 1 SFRA) was completed in March 2019 as part of the evidence base to inform the preparation of PfE.

3.2 The SFRA updated the functional flood plain (Flood Zone 3b) and applied the Sequential Test to the employment and housing land supply and PfE allocations.

3.3 The GM Level 1 SFRA recommended that more detailed strategic flood risk assessment work was required to support the PfE plan. Consequently, this was undertaken in the Greater Manchester Level 2 Strategic Flood Risk Assessment (GM Level 2 SFRA), completed in October 2020.

3.4 This produced Exception Test reports for specific allocations and land supply across the plan area including Oldham. In Oldham the Exception Tests were applied to parts of Broadbent Moss (JPA12) and Chew Brook Vale (JPA13) strategic allocations as well as a couple of land supply sites (HLA2091(1) Knoll Close and SHA1723 Wellington Road).

3.5 Updates to [Environment Agency Flood Maps for Planning](#)⁵ for Flood Zones and [surface water flood risk](#),⁶ including climate change, means that the GM SFRA can no longer be used in its entirety for the Oldham Publication Plan.

3.6 However, the following outputs are still considered to be relevant and have been used in this SFRA update⁷:

- Canal Hazard Zones; and
- Reservoir Extents

⁵ The Environment Agency Flood Map for Planning is available at <https://environment.data.gov.uk/dataset/04532375-a198-476e-985e-0579a0a11b47>

⁶ The Environment Agency Surface Water Flood risk maps are available at <https://www.gov.uk/government/publications/flood-risk-maps-for-surface-water-how-to-use-the-map/risk-of-flooding-from-surface-water-understanding-and-using-the-map>

⁷ Interactive Maps from the GM SFRA are 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>

4. Oldham Strategic Flood Risk Assessment

4.1 To prepare for the Oldham Local Plan: Publication Plan an updated SFRA and application of the Sequential Test was discussed as part of Duty to Co-operate matters with the Environment Agency and United Utilities.

4.2 It was agreed that this could be done in-house using updated flood risk information and supported by a SFRA covering note.

4.3 The scope of the SFRA covers the housing and employment land supplies⁸ as well as existing Business and Employment Areas (BEAs). There are no site allocations proposed in the Oldham Local Plan: Publication Plan. The Local Plan also only consists of non-strategic planning policies that will support the implementation of PfE.

4.4 The data used to assess the land supply and BEAS is set out in Table 1 below.

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

Flood Risk Data	Source
Flood Zones 2 and 3	Environment Agency ⁹
Climate change maps	In order of preference: Updated Beal outputs, where applicable; Greater Manchester SFRA modelling where undertaken; then Environment Agency ¹⁰ ,
Risk of Flooding from Surface Water	Environment Agency ¹¹
Risk of Flooding from Surface Water – Climate Change	Environment Agency ¹²
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 ¹³ and updated Beal outputs ¹⁴

4.5 These layers 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

⁸ Updated as at 1 April 2025.

⁹ The Flood Map for Planning – Flood Zones is available at <https://environment.data.gov.uk/dataset/04532375-a198-476e-985e-0579a0a11b47>

¹⁰ The Flood Zones plus climate change layer is available at https://www.data.gov.uk/dataset/77931470-ee6b-4f8e-8868-82842aed2e5d/flood-map-for-planning-flood-zones-plus-climate-change?utm_source=chatgpt.com

¹¹ The Risk of Flooding from Surface Water is available at <https://environment.data.gov.uk/dataset/b5aaa28d-6eb9-460e-8d6f-43caa71fbe0e>

¹² The Risk of Flooding from Surface Water – Climate Change is available here <https://environment.data.gov.uk/dataset/e5b38de2-99b3-44ee-b10c-b244926878ef>

¹³ Interactive maps from the GM SFRA are 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>

¹⁴ Obtained from the Environment Agency upon request

conclusions could be drawn and fed into the application of the Sequential Test. This is available in Appendix 1, which is a separate document.

4.6 A 10% rule of thumb has been used. If a site falls within a Flood Zone that would normally require the Exception Test it is assumed that the site could avoid this flood risk through site layout and design if the relevant flood zones do not equate to more than 10% of the site area. Where sites do fall within Flood Zones that are not compatible, and this equates to more than 10% of the site area the need for Exception Test is triggered.

4.7 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.

4.8 Sites either containing information on sewer flood risk and / or United Utilities assets or 'N/A' are those sites that previously formed part of site allocations at Draft Plan stage, which were screened by United Utilities. Sites not previously proposed as a site allocation, but which make up the housing and employment land supply or a BEA have not been screened by United Utilities, and this would need to be considered as part of the planning application stage. For these sites the spreadsheet states 'Site not screened by United Utilities' to make clear that the absence of information does not mean that the site is free from sewer flood risk or United Utilities assets.

4.9 The final column in Appendix 1 notes Flood Risk Assessment recommendations to flag early where a site-specific FRA may be required or where an applicant needs to liaise with United Utilities to discuss an asset falling within the site boundary.

5. Overview of Flood Risk

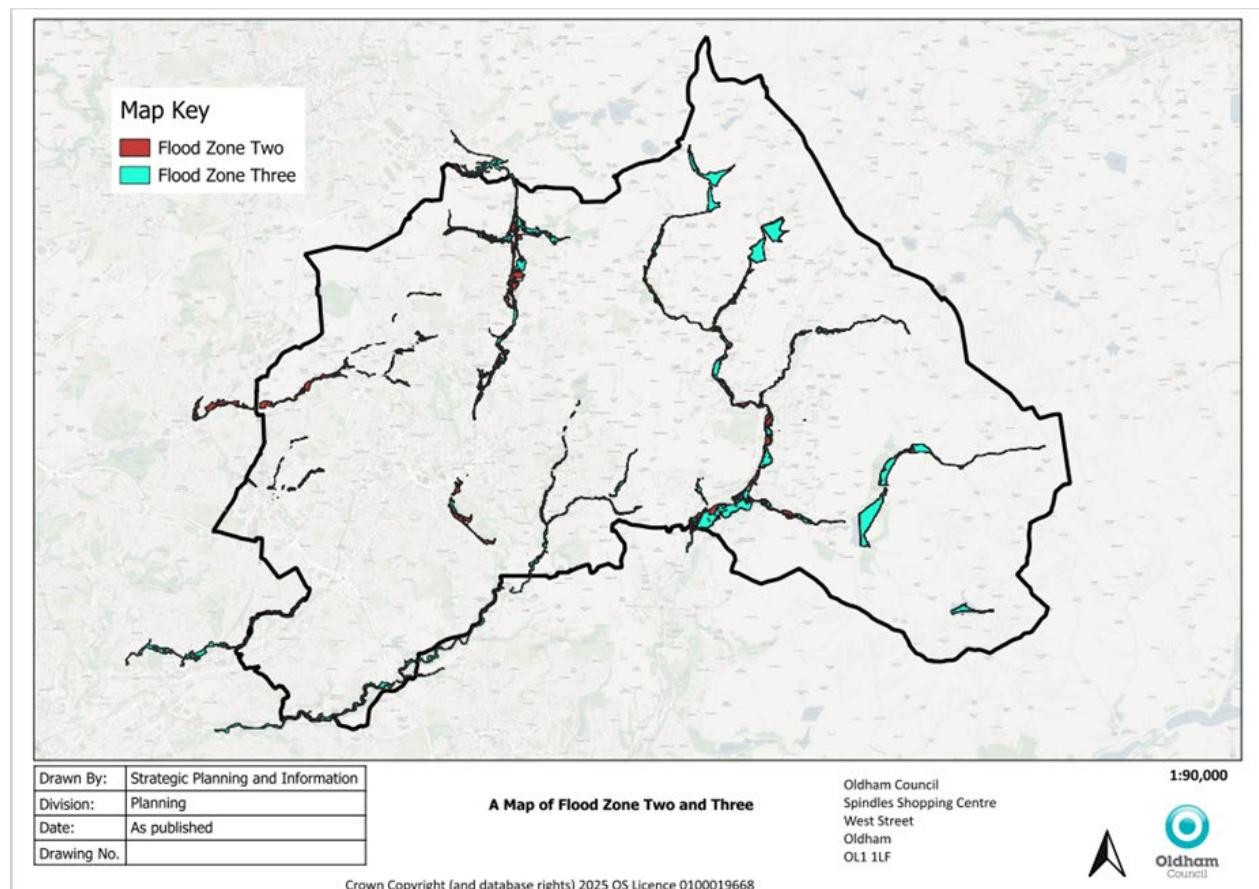
Fluvial Flood Risk

5.1 Fluvial flooding is associated with the exceedance of channel capacity during higher flows. The process of flooding from watercourses depends on several characteristics associated with the catchment including geographical location and variation in rainfall; steepness of the channel and surrounding floodplain; and infiltration and rate of runoff associated with urban and rural catchments.

5.2 Map 1 below shows Fluvial Flood risk (Flood Zones). This shows that most of the borough is not at risk of fluvial flood risk. However, there are communities within the borough that are, particularly around the River Beal including areas of Shaw, and the Tame affecting Saddleworth communities such as Grasscroft, Greenfield and Uppermill.

5.3 The Policies Map shows the functional flood plain (Flood Zone 3b), which has taken the GM SFRA 2019 and added outputs from the updated Beal modelling.

Map 1: Fluvial Flood Risk in Oldham



Surface Water Flood Risk

5.4 The Environment Agency website explains that Risk of Flooding from Surface Water (RoFSW) map is an assessment of where surface water flooding may occur when rainwater does not drain away through the normal drainage systems or soak into the ground but lies on or flows over the ground instead. It is produced using national scale modelling and enhanced with compatible, locally produced modelling from Lead Local Flood Authorities (LLFAs).

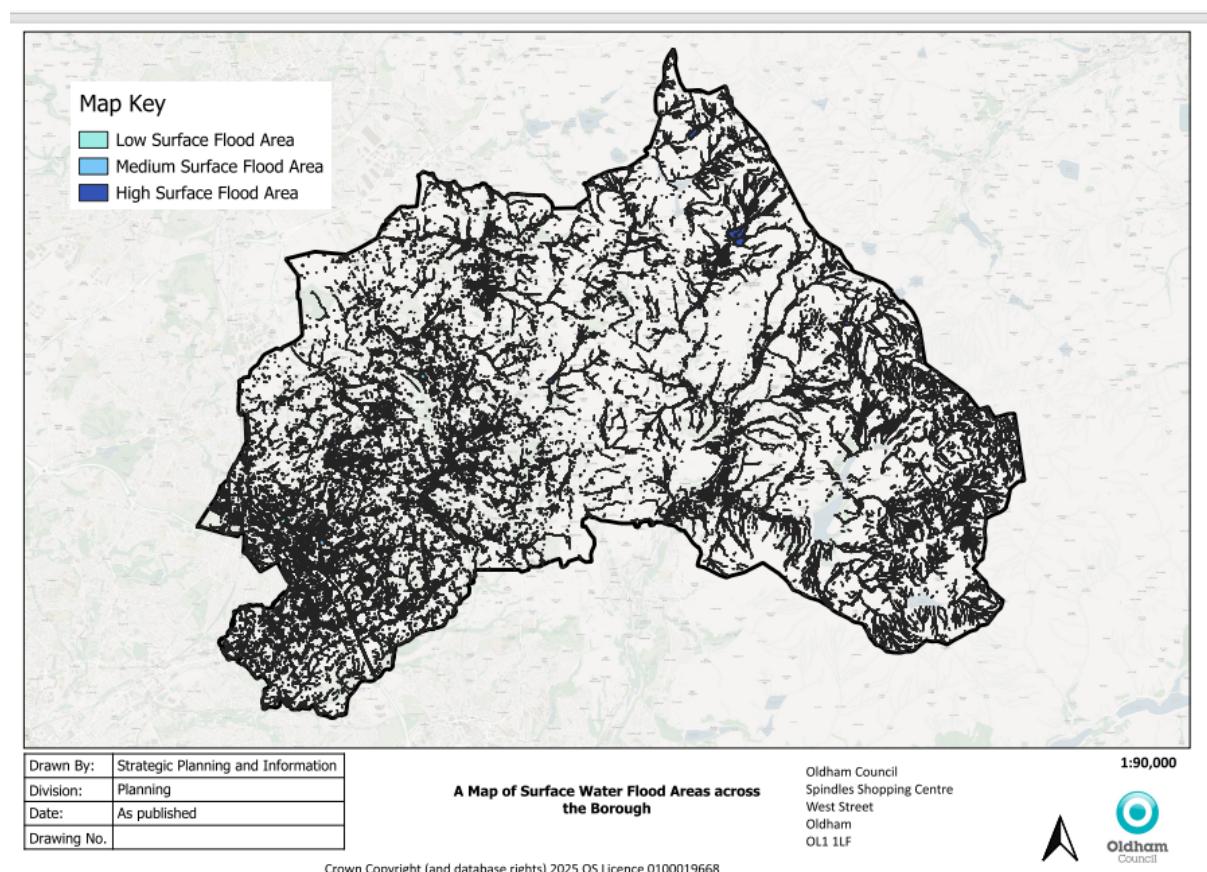
5.5 RoFSW is a probabilistic product, meaning that it shows the overall risk, rather than the risk associated with a specific event or scenario. In externally published versions of this dataset, risk is displayed as one of three likelihood bandings:

- High - greater than or equal to 3.3% (1 in 30) chance in any given year;
- Medium - less than 3.3% (1 in 30) but greater than or equal to 1% (1 in 100) chance in any given year;
- Low - less than 1% (1 in 100) but greater than or equal to 0.1% (1 in 1000) chance in any given year.

5.6 The layers used includes climate change.

5.7 Given its nature, most of the borough is at risk from surface water flooding. Map 2 shows surface water flooding across the borough.

Map 2: Surface Water Flood Risk in Oldham



Canal Hazard Zones

5.8 Previous work completed on SFRAAs has assessed risk including from the:

- Huddersfield Narrow Canal; and
- Rochdale Canal

5.9 The outputs from this are still relevant to this SFRA update.

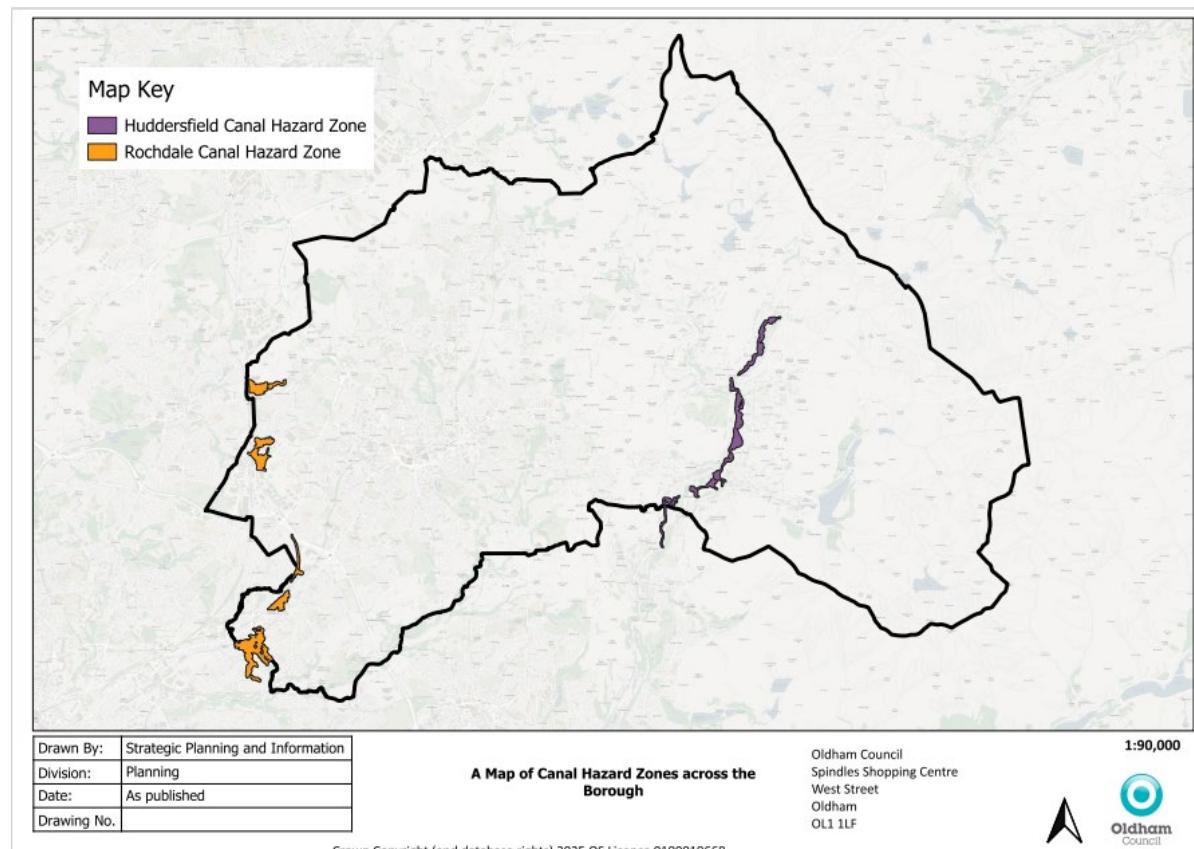
5.10 The risk of flooding along a canal is residual and is dependent on several factors. As canals are manmade systems that are heavily controlled and owned and maintained in this case by the Canal and River Trust, it is unlikely they will respond in the same way as a natural watercourse during a storm event. Flooding is more likely to be associated with residual risks, like those associated with river defences, such as overtopping of canal banks, breaching of embanked reaches or asset (gate) failure.

5.11 Canals can also have a significant interaction with other sources, such as watercourses that feed them and minor watercourses or drains that cross underneath

5.12 Map 3 shows Canal Hazard Zones affecting Oldham.

5.13 Where a site falls within a Canal Hazard Zone a site-specific FRA would be required.

Map 3: Canal Hazard Zones in Oldham



Reservoir Extents

5.14 A reservoir can usually be described as an artificial lake where water is stored for use. Some reservoirs supply water for household and industrial use, others may serve as fishing lakes or leisure facilities. Like canals, the risk of flooding associated with reservoirs is residual and is associated with failure of reservoir outfalls or breaching. This risk is reduced through regular maintenance by the operating authority – in Oldham's case United Utilities.

5.15 Reservoir Flood Maps have been used to feed into whether a site would need to consider reservoir risk within a site-specific FRA.

Critical Drainage Areas

5.16 GMCA commissioned JBA to update the Critical Drainage Areas (CDAs) for Greater Manchester. This was completed in January 2023.

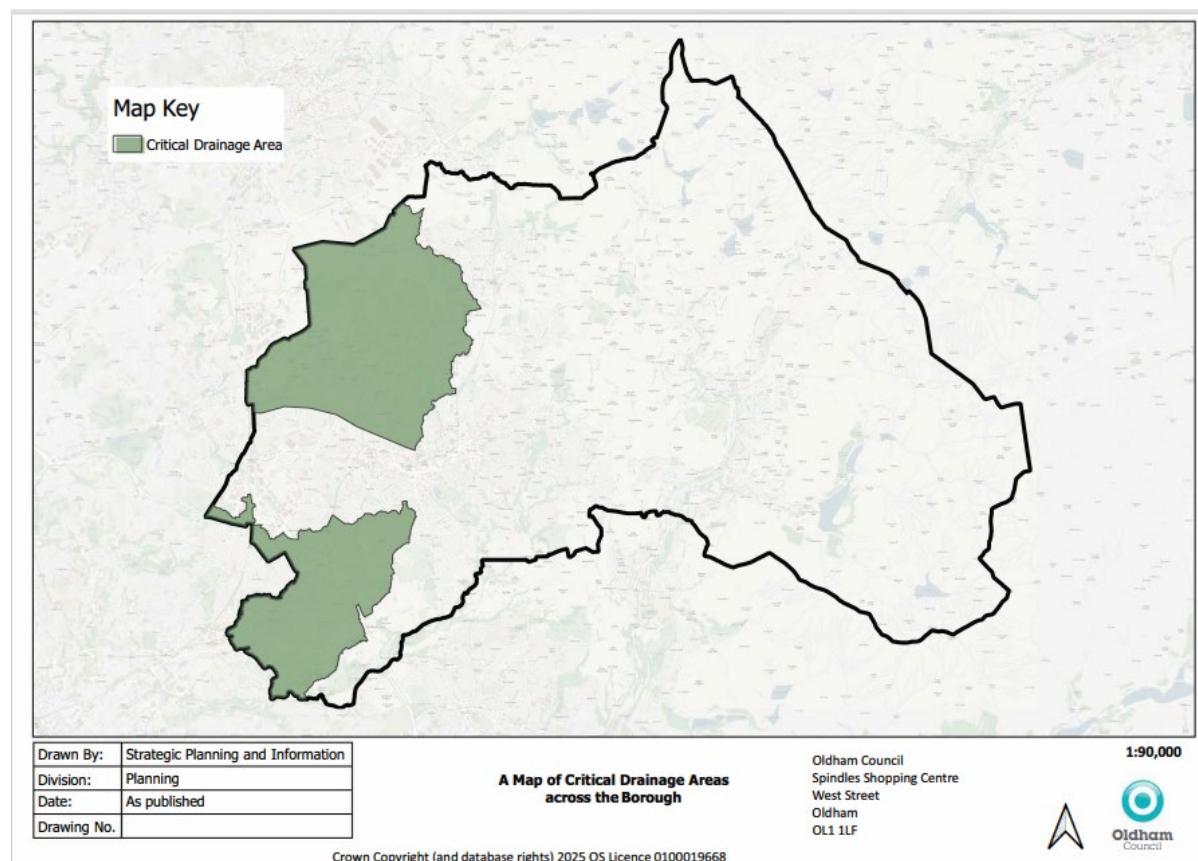
5.17 As part of this work the CDA analysis has produced heat mapping of critical surface water pressures utilising data from United Utilities, historic flood risk and national surface water mapping. It also includes separate layers looking at combined risk (fluvial and surface water).

5.18 The CDA have been used to help inform where a site would need a site-specific FRA. In line with existing and proposed planning policy a site-specific FRA would be required where a site 0.5ha and above falls within a CDA.

5.19 Where a site is smaller than 0.5ha but has other flood risk issues the FRA column has also noted that this should consider the CDA.

5.20 Map 4, below, shows the CDAs in Oldham which are concentrated to the west of the borough. These are also shown on the Policies Map.

Map 4: Critical Drainage Areas in Oldham



Groundwater Flooding

5.21 Detailed groundwater information is not available for this SFRA. However, EA Source Protection Zones have been noted in wider constraints work on the housing land supply, which relates to water quality.

5.22 Proposed Policy CC5 Groundwater Source Protection Zones addresses this. The Climate Change Topic Paper also includes information, including Map 3 showing the location of the Groundwater Source Protection Zone.

6. Sequential Test

Can development be allocated in areas of low flood risk now and in the future?

6.1 The Sequential Test has been applied to 478 sites or areas related to housing (More Vulnerable) or Employment (Less Vulnerable).

6.2 In relation to Flood Zones 422 sites fall fully within Flood Zone 1. This equates to 88% of all land supply and areas. There are 56 sites or areas that contain an area affected by Flood Zones 2, 3a and / or 3b within them.

6.3 Broken down in more detail:

- Housing land supply: 377 (91%) of the 416 sites within the housing land supply are fully within Flood Zone 1. 39 (9%) of the sites are affected by Flood Zones 2, 3a and / or 3b.
- Employment land supply: 31 (84%) of the 37 sites within the employment land supply are fully within Flood Zone 1. 6 (16%) sites are affected by Flood Zones 2, 3a and / or 3b.
- BEAs: 12 (52%) of the BEAs are fully within Flood Zone 1. 11 (48%) of the BEAs are affected by Flood Zones 2, 3a and / or 3b.

6.4 This analysis shows that most sites can be allocated within the lowest areas of flood risk but not all.

Can development be located in areas of medium flood risk both now and in the future?

6.5 Of the 56 sites or areas that are affected by Flood Zones 2, 3a and / or 3b presently 8 (14%) of these are in areas of medium flood risk in terms of Flood Zone 2. This represents 2% of the total sites assessed.

6.6 Sites in medium flood risk areas:

- Housing – 5 sites
- Employment – 2 sites
- BEAs – 1 area

6.7 This means that 48 (10%) of the 478 sites assessed have an area that includes high flood risk (Flood Zones 3a and 3b) within them in terms of present day.

6.8 Therefore, there is a need to consider if there are other reasonable available sites before applying the Flood Zone compatibility to determine if sites would need the Exception Test.

Housing Land Supply

6.9 Oldham's housing land supply has been identified as part of the [Strategic Housing Land Availability Assessments \(SHLAA\)](#)¹⁵ (SHLAA 2025 update). The housing land supply is a key evidence base informing how Oldham will deliver its housing requirement set out in PfE and the Local Plan.

6.10 In accordance with the [National Planning Guidance](#)¹⁶ SHLAAs should:

- Identify sites and broad locations with potential for development;
- Assess their development potential; and
- Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

6.11 Whilst the SHLAA is an important evidence source it does not, in itself, determine whether a site should come forward for development. The identification of potential development land within the SHLAA does not imply that planning permission would be granted on the site if a planning application were to be submitted. All planning applications will continue to be considered against the appropriate policies within the adopted Local Plan, having regard to any other material considerations, including national planning guidance. The identification of potential housing sites within the SHLAA also does not preclude them from being considered for other uses.

6.12 Whilst sites may be identified within areas of flood risk, many sites identified in the housing land supply have planning permission or are under construction. In these instances, flood risk has been considered in detail as part of the planning application process.

6.13 The housing land supply also includes potential sites (those without planning history), lapsed and stalled sites (those which have had planning permission for residential in the past but where this has lapsed or construction has been stalled for some time), and allocations (including undeveloped saved Unitary Development Plan allocations and PfE Strategic Allocations for housing). These sites have undergone a site assessment as part of the SHLAA to determine suitability, which includes a basic assessment of flood risk. The Strategic Allocations identified within PfE have undergone a separate site assessment as part of PfE and, where required, the allocation policy in PfE includes mitigation for flood risk.

6.14 The SHLAA identifies sites indicatively and at a high-level. The site boundaries capacities and timeframe for delivery identified are informed by the SHLAA assessment and other available evidence. Where sites have been included which are affected by areas of flood risk, the constraint has been noted in the SHLAA documents and it has been assumed that detailed masterplanning and/or site layout and design, at planning application stage, will inform development areas to avoid areas of flood risk within sites. In addition, it is assumed that some sites will come forward for change of use, e.g. some of the large mill sites, where the Sequential Test does not apply but a site-specific Flood Risk Assessment would still be needed, where relevant.

¹⁵ The SHLAA is available at https://www.oldham.gov.uk/info/201230/monitoring/2134/strategic_housing_land_availability_assessment_shlaa

¹⁶ National Planning Guidance on housing and economic land availability assessment is available at <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

6.15 It should also be noted that the timeframe for delivery identified within the SHLAA is subject to change. Some sites may come forward sooner or later than anticipated. As flood risk is subject to change also, sites will be re-assessed each year against the latest available evidence, as part of the SHLAA assessment. As mentioned earlier, sites that come forward through the planning process will be subject to further consideration of flood risk as appropriate.

Employment Land Supply

6.16 There is very little land available within our existing employment areas, and with over half the borough being open land and the pressure of delivering future housing growth it means that opportunities for new employment land across the borough are limited.

6.17 The employment land supply (as of 1 April 2025) we have identified will help Oldham to contribute towards achieving the overall employment floorspace requirements set out in PfE. The employment land supply is made up of:

- land designated for employment in PfE;
- sites with planning permission; and
- some sites that were previously allocated for employment but have not yet been developed.

6.18 The majority of sites identified within the employment land supply are brownfield, however there are also a small number of sites which are greenfield land.

6.19 How our employment allocations within PfE come forward, how we make better economic use of our existing mill stock and how we ensure that our designated BEAs remain attractive to a range of employment generating uses, particularly key economic sectors, will therefore be fundamental to ensuring our future economic success and growth.

Business Employment Areas

6.20 Business and Employment Areas (BEAs) are areas that already designated for employment uses within the Core Strategy. It is important to note the BEAs themselves, do not form part of the employment land supply however some of the sites within the employment land supply are located within BEAs.

6.21 In the Core Strategy some are referred to as BEAs and some are referred to as Saddleworth Employment Areas (SEAs). The Publication Plan proposes that going forward all BEAs and SEAS will be known as BEAs. Some boundary amendments have been proposed in the Publication Plan, and these have been assessed in the SFRA. Policy E2 sets out the uses permitted within a BEA.

6.22 The BEAs are existing, and mostly, developed employment areas, many of which have existed since the industrial revolution and were purposefully constructed alongside the waterways to provide power. They also form part of the local character, landscape and heritage value of the borough and therefore many will continue to remain with the buildings on site particularly where they are a textile Mill featuring as medium or high in the proposed Mills Policy (Policy HE4).

6.23 There are no alternative areas that could be designated for employment as part of this Local Plan review, as the Publication Plan does not propose allocations but instead focuses on non-strategic development management related policies.

7. Application of the Exception Test:

7.1 To consider the need for the Exception Test the sites which did not fall wholly within Flood Zone 1 now or in the future were assessed to determine what % of the site falls within Flood Zones overall.

7.2 As stated above if this was 10% or less of the site area it was considered that the site could avoid flood risk through considering site layout and design as part of the development proposal. Therefore, these sites were screened out from needing the Exception Test. If the Flood Zones equated to more than 10% for uses incompatible with the Flood Zones, the sites were screened in. They are highlighted in red text in Appendix 1 and listed below.

7.3 Overall, the following sites were screened as needing to be considered for the Exceptions Test. There are 12 sites which represents 2.5% of sites assessed.

7.4 The end conclusion has been shown below. In most cases the site already has planning permission, is under construction or more detailed flood risk work (Level 2 SFRA) has already been undertaken as part of the evidence supporting sites in PfE. The full results can be viewed in Appendix 1.

Table 2: Sites considered for Exceptions Test

Site Ref	Site Name	Vulnerability	SFRA conclusion
HLA3289	Old Mill House, Lee Side, Diggle	More Vulnerable	Site under construction therefore considered that Exception Test is satisfied.
HLA3527	616 Lees Road	More Vulnerable	Site under construction therefore considered that Exception Test is satisfied.
HLA3889	Sun Yr Afon, Ladcastle Road, Uppermill	More Vulnerable	Site under construction therefore considered that Exception Test is satisfied.
HLA3981	Shaw Distribution Centre, Linney Lane, Shaw	More Vulnerable	Site under construction. Detailed flood risk work done as part of planning application therefore considered that Exception Test is satisfied.
HLA4111	High Lawn House, High Grove Road, Grasscroft	More Vulnerable	Site has extant planning permission. Considered Exception Test is satisfied.

Site Ref	Site Name	Vulnerability	SFRA conclusion
			If permission lapses applicant would need to apply Exceptions Test.
HLA4149	608 Huddersfield Road	More Vulnerable	Site has had planning permission at the start of the monitoring period April 2025 and has since began construction. Therefore, considered that Exception Test is satisfied.
HLA4225	Linney Lane Motors, Linney Lane, Shaw	More Vulnerable	Site has planning permission and is being delivered with HLA3981 and therefore the flood risk assessment completed for this site is relevant. It is considered that the Exception Test is satisfied.
HLA4284	Former Natwest Bank Building 55 High Street Uppermill	More Vulnerable	Site has planning permission and would likely stay as change of use as a non-designated heritage asset on the proposed local list within a conservation area in a future development scenario. The Sequential Test and Exception Test is not applicable to change of use.
JPA10	Beal Valley	More Vulnerable	Site assessed as part of PfE. SFRA conclusion was to consider site layout and design around flood risk which is still considered appropriate. Therefore, it is considered that the

Site Ref	Site Name	Vulnerability	SFRA conclusion
			<p>Exception Test is satisfied.</p> <p>Development is required to be in accordance with PfE Policy JP Allocation 10: Beal Valley which requires development to include provision for a wetland catchment area, to provide net gains in flood storage for the wider catchment and / or actively reduce flood risk impacts downstream through additional storage, integrating it with the wider multi-functional green infrastructure network, and incorporating sustainable drainage infrastructure.</p>
JPA12	Broadbent Moss	More Vulnerable	<p>Site assessed as part of PfE. SFRA conclusion was to consider site layout and design around flood risk which is still considered appropriate. Therefore, it is considered that the Exception Test is satisfied.</p> <p>Development is required to meet PfE Policy JP Allocation 12: Broadbent Moss. This requires an appropriate flood risk assessment in line with the Level 2 SFRA which was completed for the wider site. It also</p>

Site Ref	Site Name	Vulnerability	SFRA conclusion
			requires providing for a wetland catchment area.
SHA0196	Nether Hey Farm, Holden Fold Lane	More Vulnerable	The site was assessed in the GM SFRA, and the conclusion was to consider site layout and design around flood risk. This conclusion remains, considering the amount of land that has increased in Flood Zone 2 and 3. It is considered that the Exception Test is satisfied.
OLD0183	Broadbent Moss	Less Vulnerable	<p>This parcel relates to part of PfE allocation JPA12 allocated for employment.</p> <p>The Exception Test was undertaken as part of the GM SFRA supporting PfE (GM allocation 15a – Broadbent Moss). Exception Test is satisfied.</p>

7.5 The sites all contribute towards meeting the housing or employment requirements to support the PfE vision.

8. Conclusion

8.1 In conclusion most of the land supply passes the Sequential Test. There are no other reasonable sites available for development at present. Sites screened in for the Exceptions Test have planning permission, are under construction, have undergone further assessment as part of the SFRA supporting PfE, would involve change of use, or it is still considered that flood risk can be avoided through site layout and design.

Appendix 1: Sequential Test of Housing and Employment Land Supply and Business and Employment Areas

Please see separate standalone document for this.