



Sister, Plot C
Flood Sequential Test

September 2025

Contents

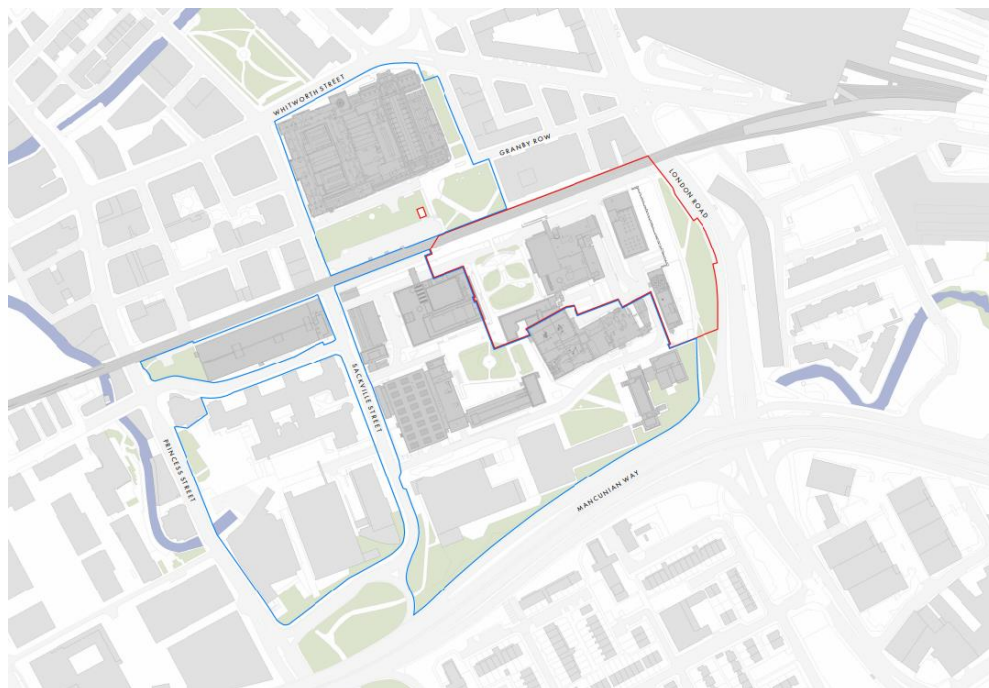
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1. Introduction

Introduction

- 5.1. This Flooding Sequential Test (the “Report”) has been prepared by Deloitte LLP on behalf of ID Manchester Ltd and The University of Manchester (the “Applicants”).
- 1.1. This Sequential Test accompanies an application for planning permission (Ref: 143024/FO/2025) for a Site known as Sister Plot C. The application is in relation to the demolition of all existing buildings on the site to make way for a new commercial-led development. This will include two new office buildings, the conversion of existing viaduct arches into flexible commercial/retail space, and the partial integration of a listed sculptural wall into one of the new office buildings. The development will also significantly enhance the public realm with a new residential boulevard and civic square. Two Listed Building Consent (LBC) applications were submitted concurrently to this application in relation to works to the Sculptural Wall located at the east of the Site and Manchester South Junction and Altrincham Railway Viaduct located at the northern edge of the Site.
- 1.2. The description of the Development for the planning application as detailed on Public Access is:
- Phased development comprising: Phase A - demolition of existing buildings and structures, erection of a basement (C1 Building and C2 Building) and a podium across lower ground and upper ground floors comprising flexible commercial space (Class E and/or Sui Generis drinking establishment), erection of a building (C1 Building) to form offices (Class E), landscaping works, highways, access, servicing, infrastructure and other associated works; Phase B: erection of a podium across lower ground and upper ground floors and a new building (C2 Building) to form offices (Class E) and flexible commercial and community uses (Class E, F2 and/ or Sui Generis drinking establishment), alterations to the existing Sculptural Wall (Hollaway Wall), relocation of existing art work, landscaping works, highways, access, servicing, infrastructure and other associated works; Phase C - change of use and associated works to railway Viaduct arches to form flexible commercial units (Class E, and/ or Sui Generis - drinking establishment) including highways, access and servicing arrangements, and other associated works*
- 1.3. The description of the Development for the concurrently submitted listed building consents are as follows:
- Sculptural Wall (Hollaway Wall) Listed Building Consent):
- Listed building consent for alterations to Sculptural Wall (Hollaway Wall), to encapsulate the wall within new office building (C2 Building), as part of mixed-use development proposals comprising offices use (Class E) and flexible commercial and community uses (Class E, F2 and/ or Sui Generis- drinking establishment) (143025/LO/2025)*
- Manchester South Junction and Altrincham Railway Viaduct Listed Building Consent:
- Listed Building Consent for alterations to Manchester South Junction and Altrincham Railway Viaduct to facilitate the change of use to form flexible commercial units (Class E, and/ or Sui Generis - drinking establishment).*
- 1.4. Please refer to Figure 1 below for a Site Location Plan for the Proposed Development (SISCO-AAM-ZZ-ZZ-DR-AR-07000 P01).

Figure 1 Site Location Plan



The Application Site

- 1.5. The Site is bound by Vimto Park and the rear of buildings fronting onto Granby Row to the north, London Road to the east, Jackson's Mill and the Maths and Social Sciences (MSS) Tower to the south, and the Renold Building to the west.
- 1.6. The Site is partially located within the Whitworth Street Conservation Area, with the north aspect of the Plot C boundary (Viaduct) forming the Conservation Area boundary.
- 1.7. The Site is located within the IDM Strategic Regeneration Framework (SRF) Area, endorsed by MCC Executive Committee in December 2023. The SRF emphasises cluster dynamics, facilitated by co-location, as crucial for the success of Manchester City Centre and the Oxford Road Corridor. Sister, at the heart of this cluster, is poised to become a flagship commercial innovation hub, connecting the Corridor with Greater Manchester's other growth locations and unlocking large-scale innovation commercialisation.
- 1.8. The Site extends to circa 2.2 ha. It principally comprises made ground, existing buildings and structures. Areas of landscaping and grass are located in the eastern and western parts of the Site.
- 1.9. Four vacant buildings associated with the former UMIST Campus of the University of Manchester are located within the Site, which range from two to 15-storeys in height. The existing vacant buildings are:
 - Barnes Wallis and Wright Robinson Building – vacant former student union and halls of residence, comprising 15-storey tower (84.6m AOD) (Wright Robinson), with 3-storey podium (Barnes Wallis).
 - Moffat Building – vacant former education and research space within a part three, part two storey building.
 - Morton Laboratory – vacant former university chemical engineering laboratory comprising a five storey building.
 - MMP – vacant former university staff building, four storeys in height.

- 1.10. The Site also comprises the former Bowling Green, a landscaped area that formed the centre of the former campus. The Butterfly Stairs are located within the Bowling Green, providing stepped access between the significant level changes between Altrincham Street and the Bowling Green.
- 1.11. The following pieces of public art are located within the Site:
- Archimedes statue – located beneath Viaduct, along Altrincham Street;
 - Generations of Possibilities (Magnets) – located along Altrincham Street;
 - Large Urns - located along Altrincham Street;
 - Stone Monument – located at entrance to Renold Building;
 - Havelock Mill Structure – located on the Bowling Green; and
 - UMIST Cube - located northeast to Renold Building

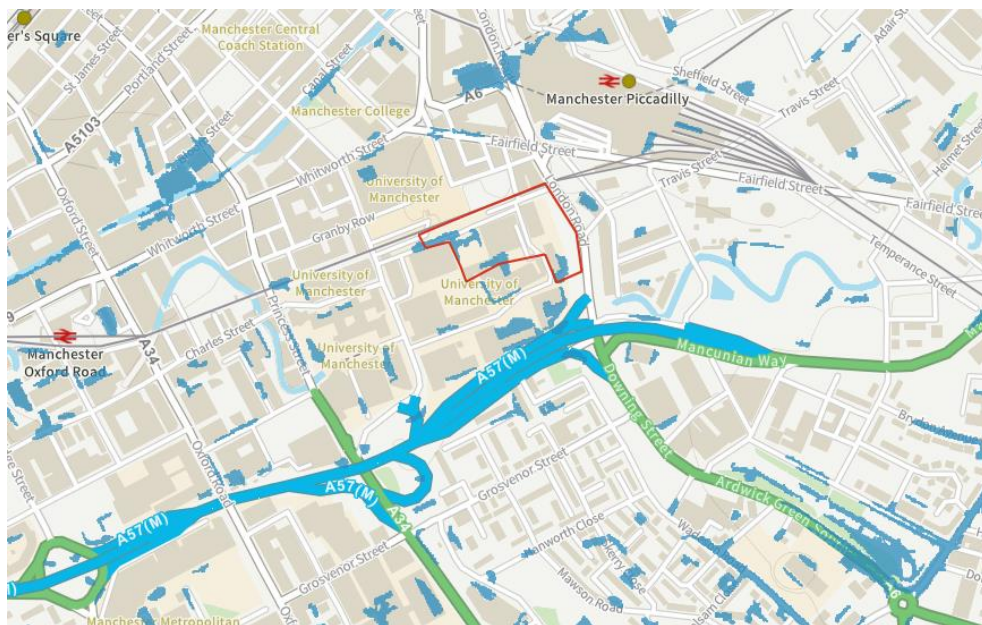
Environment Agency Designation

- 1.12. A Flood Risk Assessment (FRA) (prepared by Civic Engineers, dated April 2025) is submitted in support of the full planning application (Ref: 143024/FO/2025).
- 5.2. As noted in the submitted FRA, the Sequential Test, as set out in the NPPF, aims to steer developments to areas with the lowest risk of flooding (i.e. to steer developments to Flood Zone 1 areas where possible).
- 5.3. In addition there are localised areas of surface water flooding within the Site. The localised areas of surface water have been considered as part of the FRA. It notes that that various small portions of the site to be at medium risk of surface water flooding. As such, and based upon
- 5.4. The site specific Flood Risk assessment was produced in April 2025 (and submitted in May 2025) which means this was undertaken prior to the latest update to the Environmental Agency Information, which also includes additional information for climate change forecasts up to 2125. Therefore an updated Flood Risk Assessment has been produced by Civic (SISCO-CIV-ZZ-ZZ-RP-CV-00002, revision P07). The updated FRA confirms the Site is still located within Flood Zone 1, however, acknowledges the increases in river flow anticipated to occur throughout the lifetime of the development based on climate change allowances for the 2080s epoch. It is confirmed that, the proposed development levels have been reviewed against the modelled flood extents and demonstrate that all built elements remain outside the floodplain extents for both the present-day and climate change scenarios. Finished floor levels are set at a minimum of 34.10m AOD, providing a freeboard of 0.33m above the predicted flood levels associated with the 1% AEP (1 in 100-year) flood event for both present-day and future climate change projections.
- 1.13. Figures 2 and 3 set out the latest fluvial flood risk and the surface water flood risk respectively.

Figure 2 Extract of Flood Zone Map (fluvial flood risk – Source: Gov.UK Flood Risk Map)



Figure 3 Extract of Flood Zone Map – (Surface Water Flood Risk – Source: Gov.UK Flood Risk Map)



- 1.14. Within this context, the Site is located within Flood Zone 1, as per the submitted FRA, and so the Proposed Development is acceptable
- 1.15. Regarding the risk of flooding from surface water, the EA data indicates that there are pockets of areas within the Site that is susceptible to surface water flooding with its annual exceedance probability of 3.3% (1 in 30) chance of flooding each year.

- 1.16. To mitigate the risk, it is noted that the majority of surface water flood risk occurs on areas of the Site that are proposed to be developed into public realm, such as Altrincham Street, Mill Lane and the proposed 'Sister Square'. There is therefore limited risk in locations in which the two new commercial buildings are proposed. Within the areas at risk of surface water flooding, extensive planting is proposed which will act as a form of sustainable urban drainage, reducing the posed risk of surface water flooding.
- 1.17. However, as there is a risk of surface water flooding within the site boundary the submission of a sequential test is required in accordance with NPPF Paragraph 175.
- 1.18. As such, a sequential test has been undertaken in line with the relevant planning policy as set out within Section 2 of this report.

2. Planning Policy Context

National Planning Policy Framework (NPPF) (2024)

- 2.1. Paragraphs 172-177 of the NPPF set out the approach for planning and flood risk.
- 2.2. Paragraph 173 of the NPPF sets out a sequential approach is required for flooding:
“A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding, by following the steps set out below.”
- 2.3. Paragraph 174 provides further details on the aim of the Sequential Test:
“Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. 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.”
- 2.4. Paragraph 175 of the NPPF states how the Sequential Test should be used:
“The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).”
- 2.5. The NPPF then goes on to guide when the Exception Test is required (paragraphs 177-181).

Planning Practice Guidance (PPG)

- 2.6. The PPG requires that for the purposes of decision taking, local planning authorities should apply the Sequential Test, and if needed, the Exception Test, to ensure flood risk is minimised and appropriately addressed and to use site layout to locate the most vulnerable aspects of development in areas of lowest flood risk.
- 2.7. The advice in respect of the application of the Sequential Test is set out within the section “How should the Sequential test be applied to planning applications” (Paragraph: 027 Reference ID: 7-027-20220825 Revision date: 25 08 2022).
- 2.8. The PPG also includes guidance on what is considered a ‘reasonably available’ site and is defined as follows:
“‘Reasonably available sites’ are those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development.

These could include a series of smaller sites and/or part of a larger site if these would be capable of accommodating the proposed development. Such lower-risk sites do not need to be owned by the applicant to be considered ‘reasonably available’.

The absence of a 5-year land supply is not a relevant consideration for the sequential test for individual applications.” (Paragraph: 028 Reference ID: 7-028-20220825 Revision date: 25 08 2022)
- 2.9. As set out below, the PPG also states that:
“Relevant decision makers need to consider whether the test is passed, with reference to the information it holds on land availability. The planning authority will need to determine an appropriate area of search,

based on the development type proposed and relevant spatial policies. The applicant will need to identify whether there are any other 'reasonably available' sites within the area of search, that have not already been identified by the planning authority in site allocations or relevant housing and/or economic land availability assessments, such as sites currently available on the open market. The applicant may also need to check on the current status of relevant sites to determine if they can be considered 'reasonably available'.

Local planning authorities should inform the applicant and, where relevant, the Environment Agency about the outcome of the sequential test at the earliest opportunity, as this may avoid other work being undertaken unnecessarily.

Local planning authorities may find it helpful to prepare guidance on the appropriate area of search for common development types. They may also find it helpful to keep an up-to-date register of 'reasonably available' sites, clearly ranked in flood risk preference. This could be part of their housing and/or economic land availability assessments or as a separate document. This should be informed by the strategic flood risk assessment with any ranking methodology agreed with the Environment Agency. Such an approach could increase certainty for developers and save time at application stage.

Ultimately the local planning authority needs to be satisfied in all cases that the proposed development would be safe throughout its lifetime and not lead to increased flood risk elsewhere.” (Paragraph: 029 Reference ID: 7-029-20220825 Revision date: 25 08 2022)

Local Planning Policy Considerations

2.10. The Development Plan for the site comprises the following:

- Greater Manchester Places for Everyone (2024)
- Manchester Core Strategy (2012) and 2024 Addendum
- Manchester Proposals Map (2012)
- Saved Unitary Development Plan Policies (1995)
- Greater Manchester Joint Waste Development Plan Document 2012; and
- Greater Manchester Joint Minerals Plan 2013.

2.11. The ID Manchester Strategic Regeneration Framework (2023) also forms a material consideration to the Proposed Development.

2.12. Core Strategy Policy EN14 'Flood Risk' notes that all new development should minimise surface water run-off, including through Sustainable Drainage Systems (SUDS) and the appropriate use of Green Infrastructure. Developers should have regard to the surface water run-off rates in the SFRA User Guide. In CDAs, evidence to justify the surface water run-off approach / rates will be required.

2.13. Policy EN14 also establishes the following:

“In line with the risk-based sequential approach contained within PPS25, development should be directed away from sites at the greatest risk of flooding, and towards sites with little or no risk of flooding; this should take account of all sources of flooding identified in the Manchester-Salford-Trafford Strategic Flood Risk Assessment (SFRA).”

PPS25 has been replaced by the NPPF and the PPG.

2.14. Core Strategy Policy EN8 'Adaptation to Climate Change' notes all development proposals should aim to achieve *“minimisation of flood risk by appropriate siting, drainage, and treatment of surface areas to ensure rain water permeability”*.

- 2.15. In addition to the above policies, Places for Everyone Policy JP-S4 'Flood Risk and the Water Environment' requires developments to manage surface water run-off through sustainable drainage systems and as close to source as possible. Development should achieve greenfield run-off rates unless it is demonstrated to be impracticable.

3. Methodology

Introduction

- 3.1. The methodology has sought to follow the approach set out within the NPPF and PPG for the completion of Sequential Test for Planning Applications.
- 3.2. In applying the sequential test, there are three elements to be considered:
- The geographical area across which the test is applied;
 - The range of alternative sites to be considered; and
 - Whether the site is 'reasonably available'.

Geographical Area

- 3.3. A 'whole borough' approach can be applied to the sequential testing of alternative sites. However, a reduced geographical area in the search for alternative sites is justified where there is evidence that there is a specific need for the proposed development in that locality, or where the typology of the development would not usually be found within other parts of the borough (e.g. high-density urban centre development would not be considered appropriate within suburban and rural areas).
- 5.5. The Site is located within the ID Manchester SRF area. The vision for this SRF area is to deliver a world-class Innovation District at the heart of Manchester. The Innovation District will bring together cutting edge business, education and communities in order create an innovation platform within which new ideas and disruptive technologies emerge. The successful delivery of ID Manchester SRF vision will be vital in driving inclusive and sustainable economic growth for the city region and beyond.
- 3.4. The adopted Greater Manchester Places for Everyone (March 2024) identifies the City Centre as the primary focus for business/commercial uses (Policy JP-Strat2). In addition, Policy CC1 of the Manchester Core Strategy identifies the City Centre as a strategic economic location and focus of employment growth in the City and City Region. The Site falls under the Manchester City Centre Boundary which is expected to accommodate 33ha of office or similar employment development between 2012 – 2027 and a further 25ha within the City Centre fringe.
- 3.5. The Site's current location within the Oxford Road Corridor and in close proximity to both the University of Manchester and Manchester Metropolitan University campuses, meets the City's locational criteria. The development also supports the growth strategy by continuing to deliver development in an identified regeneration area, within the context of increasing pressure on the finite land supply within the City Centre; in this regard, it supports Policy H12 which notes that developments that support the City's regeneration objectives should be prioritised.
- 3.6. Within the SRF Area, the Site is identified as the first visual signifier of Sister and the gateway to the Oxford Road Corridor when arriving from Piccadilly, and therefore being an opportunity to deliver tall, landmark buildings. A range of the key placemaking interventions envisaged in the SRF are captured within the Site, including the eastern portion of the new east-west routes along Altrincham Street and Mill Lane, repairing and enhancing the public realm along London Road, a new civic square in the heart of the SRF Area, and creating a critical mass of commercial space to support the success of the innovation district.
- 3.7. The application of this Sequential Test therefore mainly considers development sites located within the Manchester City Centre boundary – last updated in February 2016 by Manchester City Council Executive Committee. There are specific areas on the outskirts of the City Centre (covered by respective Strategic Regeneration Frameworks i.e. NOMA and Great Ducie Street) which have been identified to be suitable for commercial development so are also included within the boundary of this sequential test.

- 3.8. This boundary has been assessed to be appropriate for this search given the form of the Proposed Development, which would not be considered appropriate outside of the City Centre. Together with consideration for the height of the Proposed Development, the importance of having commercial led development within the City Centre, and the benefits of brownfield developments in close proximity to public transportation and infrastructure.

Range of Alternative Sites

- 3.9. Following the establishment of the geographical area (Manchester City Centre and appropriate periphery Sites) for potential alternative sites, comparative sites need to be identified and assessed for their availability.
- 3.10. It is proposed that a +/- 10% buffer is applied to the capacity of the development to create a range within which comparator sites can be identified and allow an assessment of similar sites that could deliver a similar amount of office floorspace.
- 3.11. A greater parameter than this would have the potential to introduce a wider range of development, impacting upon the viability and economics of the development.
- 3.12. The Proposed Development (under planning application ref. 143024/FO/2025, indicates the maximum quantum of Grade A office floorspace of 72,928sqm (GIA) capable of meeting the requirements of Sister in terms of attracting anchor tenants and accommodating business headquarters. This generates a range of comparison sites that could facilitate between 65,635sqm and 80,220sqm (GIA) of Grade A office floorspace.
- 3.1. The 10% comparator is only applied to the office element of the Proposed Development, with the minor flexible commercial floorspace (including that being provided within the repurposed Grade II listed Viaduct arches) excluded from the assessment. Paragraph 176 of the NPPF notes “*minor development [...] should not be subject to the sequential test, nor the exception test*”. Given these spaces are ancillary to the Proposed Development, it is not considered that they need to be assessed as they will only come forward as part of the comprehensive redevelopment. They would not come forward as a separate application.

Assessing whether the sites are Reasonably Available

- 3.13. In accordance with the NPPF, for a development to pass the Sequential Test, it must be demonstrated that there are no reasonably available alternative sites appropriate for the development proposals located in areas with a lower risk of flooding.
- 3.14. In order to be considered sequentially preferable, the sites should be in an area at lesser risk of flooding, in this instance Flood Zone 1 that are not impacted by any surface water flooding.
- 3.15. A Council will typically accept that a site is not reasonably available if:
- It contains an existing operation or business use unless a planning approval for development proposes to extinguish that use; or,
 - It has a valid planning permission for development of a similar type and scale which is likely to be implemented.
- 3.16. Evidence that a planning permission is likely to be implemented can include:
- The discharge of conditions (or the submission of an application to discharge conditions); or
 - Indication from the landowner(s), applicant or developer that a development is being brought forward; or
 - The approval of reserve matters applications.
- 3.17. The PPG states that reasonably available sites “*could include a series of smaller sites and/or part of a larger site if these would be capable of accommodating the proposed development*”. This is discussed later on within the Report.

Application of the Sequential Test and Exceptions Test

- 3.18. Following the above methodology, the findings of the Sequential Test assessment are outlined in the following section.
- 3.19. This is followed by an overview of the requirement for the Exception Test, which is not considered applicable in this instance.
- 3.20. The sources for identifying alternative sites are as follows¹:
- Manchester Core Strategy (2024 as amended);
 - Interactive Policy Map (Local Development Plan);
 - Greater Manchester Places for Everyone (2024);
 - Manchester City Council Planning Public Access Database;
 - Mayfield SRF (2018);
 - NOMA SRF (2020);
 - Great Ducie Street SRF (2018);
 - First Street SRF (2015);
 - CoStar; and
 - The Estates Gazette.

¹ There are no Local Plan Site Allocations under the Manchester City Council Local Development Plan.

4. Sequential Assessment

- 4.1. As outlined in Chapter 3 - Methodology, in order for development proposals to pass the Sequential Test it has to be demonstrated that there are no reasonably available alternative sites appropriate for the proposed development located in areas with a lower risk of flooding (Flood Zone 1 where not impacted by surface water flooding).
- 4.2. This reduces the geographical area for potential alternative sites given certain parts of the City Centre are located within Flood Zone 2, together with areas of localised surface water flooding spread across the City.

Site Sifting

- 4.3. The first step is to review the relevant sources of information to establish the extent of sites within the City Centre that are within the alternative site range parameter.

Nearby Strategic Regeneration Frameworks

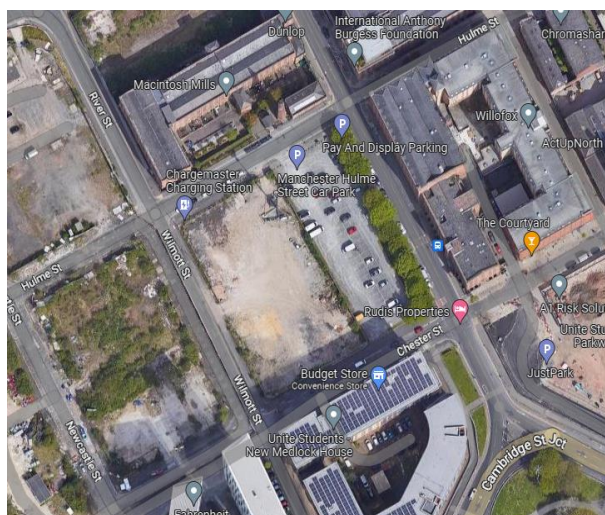
- 4.4. The first consideration for alternate sites would be to assess whether the proposed development could be accommodated within another Strategic Regeneration Area within the Oxford Road Corridor or surrounding area such as Mayfield. These areas are seen as regeneration priorities within the city where development can be focused. Research has demonstrated there are 2 relevant regeneration areas located within the search boundary, further details of these are provided below:
 - ID Manchester SRF – the proposed uses for the ID Manchester SRF have been strategically co-ordinated to facilitate a thriving innovation ecosystem. In order to achieve this a large commercial landmark building (in the form of the Proposed Development) is required as a critical mass in order to support the wider masterplan vision. The positioning of this building has been chosen within its current location as it is an important strategic location at a key entrance point to the masterplan. This is due to its strong linkages to nearby transport nodes as well as the wider City Centre. For completeness however, other plots have been duly assessed and discounted:
 - Sackville and Renold: given their listed status (both being Grade II) it is not deemed appropriate for the flagship commercial building to be located within these buildings. This is due to the limited nature of physical works that could be undertaken to facilitate the type of office space required in order to protect the historic fabric of the building both internally and externally.
 - Plot H – has been reviewed and discounted due to not being of a sufficient size to support the quantum of commercial space required. This space has also been identified within the SRF as appropriate for residential dwellings.
 - Plots D and G – due to their location centrally within the masterplan area, these plots do not benefit from the same level of accessibility or prominence as the location chosen for the Proposed Development. Consequently, they do not benefit from the same strategic benefits that are so important for the success of this space and have therefore been discounted.
 - Plots E and F – In the same way as the proposed both Plots E and F face risks of surface water flooding. It is therefore not considered that they are in a location of lesser flood risk. These plots have therefore been discounted.

- Circle Square – This commercially-led mixed-use development is largely complete. Three purpose-built student accommodation (PBSA) blocks, two residential buildings, and two commercial office buildings are operational. The final commercial building (No.3 Circle Square) was completed on 15 July 2025, making the site unavailable for development. The masterplan's final phase, Manchester Technology Centre is fully occupied and has therefore been discounted from the assessment.

5.6. Mayfield – This mixed use neighbourhood is subject to three planning consents across numerous plots including a 9 storey commercial building, multi-storey car park and 13 storey office building. A further planning application was approved in July 2025 for a residential development located within the southeastern portion of the masterplan area. Mayfield Park is also operational, located centrally within the masterplan. Development plots do still remain available within the Mayfield SRF located in the western corner (already identified for residential use with the SRF), and located on the site of the depot and are (already identified for commercial development within the SRF). These plots are also partially located within flood zone 2 and have therefore been discounted.

5.7.

5.8. First Street – The majority of the First Street Strategic Development Framework (SDF) plots are now either developed, under construction or subject to planning permissions or live applications. An exception does include the land to the north of the Macintosh Mill (pictured below), however, this has been discounted due to being located within Flood Zone 2.



5.9. NOMA – The majority of the NOMA SRF plots are now developed, under construction or subject to a live planning application. However, as per the latest SRF update (2020) 3 plots at NOMA remained, these being Plot H, Plot K and Plot Q. These plots however are only able to accommodate 270,000sqft, 135,000 sqft and 211,000sqft of commercial space respectively. These plots therefore do not meet the criteria in terms of delivering the necessary demand for large flexible floorplate commercial space and associated critical mass; providing large and flexible is strategically imperative for attracting major anchor tenants in turn driving economic growth, and establishing (Sister as) a leading global innovation district. The ability to offer large, adaptable floorplate is paramount in securing key anchors and fostering a thriving innovation ecosystem. These plots have therefore been discounted.

Sites for Sale

4.5. A search of the Estates Gazette Property and CoStar was undertaken on 20th August 2025 to review and establish if there were any alternative sites available on the market within Manchester City Centre.

4.6. A search field of 2km from the Site was entered for sites that were listed as 'for sale' or 'at auction' and all property types, tenure and price were considered. This search area was chosen to fully encompass the City Centre (and fringe search area).

To identify compatible sites to the Site (at 2.2ha), sites within a 25% parameter of the size of the Site (between 1.65ha to 2.75ha) were considered.

- 4.7. No alternative sites within 5 miles from Manchester were identified from Estates Gazette Property or CoStar.

Nearby Allocated Sites

- 4.8. A review has been undertaken of Sites allocated within the Greater Manchester Places for Everyone which was formally adopted in March 2024. This assessment has demonstrated that there are no sites allocated for commercially-led mixed use development located within the search boundary as set out within Section 3 of this report, or indeed within the City Centre as a whole. As such, this review has not revealed any sites that could be considered reasonably available.
- 4.9. In addition, a further review has been undertaken of the Manchester Core Strategy (2024 as amended), which has revealed there are no sites allocated sites within the City Centre. This is likely due to the nature of Core Strategy Policy CC1 which identifies the City Centre more generally to accommodate significant levels of office space. There are sites allocated within the Core Strategy as strategic employment locations such as Airport City (Policy EC11), however due to its location a significant distance away from the geographic assessment boundary (12km) this site has been discounted.
- 4.10. Based upon this review of Greater Manchester Places for Everyone (2024) and Manchester Core Strategy it has been concluded there are no allocated sites near to the Proposed Development Site that could be considered reasonably available.

Disaggregation

- 4.11. Paragraph 174. of the NPPF (2024) states:
- “The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. 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.”*
- 4.12. The PPG on “What is a reasonably available” site also states:
- “‘Reasonably available sites’ are those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development.*
- These could include a **series** of smaller sites and/or part of a larger site if these would be **capable of accommodating the proposed development**. Such lower-risk sites do not need to be owned by the applicant to be considered ‘reasonably available’.*
- The absence of a 5-year land supply is not a relevant consideration for the sequential test for individual applications.”* (Paragraph: 028 Reference ID: 7-028-20220825 Revision date: 25 08 2022)
- 4.13. With this regard, it is therefore important to consider latest Case Law. The High Court of Justice (The Hon. Mr Justice Houlgate) case (Neutral Citation Number: [2024] EWHC 279), which ruled on two claims between Mead Realisations Limited (“Mead”) and the Secretary of State for Levelling Up, Housing and Communities and North Somerset Council, and between Redrow Homes Limited and the Secretary of State for Levelling Up, Housing and Communities and Hertsmere Borough Council is an important judgement on the interpretation and application of the Sequential Test in national policy on flood risk and therefore represents a material consideration in the determination of this application. Paragraph 110 states:
- “I note that the PPG refers to a “series of smaller sites.” The word “series” connotes a relationship between sites appropriate for accommodating the type of development which the decision-maker judges should form the basis for the sequential assessment. This addresses the concern that a proposal should not automatically fail the sequential test because of the availability of multiple, disconnected sites across a local authority’s area. The issue is whether they have a relationship which makes them suitable in*

combination to accommodate any need or demand to which the decision-maker decides to attach weight.”

4.14. This judgement therefore establishes a precedent that whilst it is possible to consider these smaller sites, there must be some connection between them and that the smaller sites shouldn't be disconnected or not connected to one another.

4.15. When considering the potential for parts of larger sites to be counted as reasonably available paragraph 109 of the Justice Houlgate judgement to be of interest. This states:

“Whether such an arrangement is so capable depends on the judgments to be made by the decision-maker on such matters as the type and size of development, location, ownership issues, timing and flexibility.”

4.16. Due to the scale and size of the Site, we do not consider there to be an abundance of sites larger than the Site within Manchester City Centre. Sites which are larger than the Site would also require extensive co-ordination with other developers and landowners and would cause extensive delays to the development process. This is of relevance given the PPG (Paragraph: 028 Reference ID: 7-028-20220825 Revision date: 25 08 2022) notes reasonably available sites must be *“available to be developed at the point in time envisaged for the development”*.

4.17. We therefore conclude that most larger sites are unlikely to be reasonably available to the Applicant at the point in time envisaged for the development. The Applicant has ambitions to commence construction and therefore the development within a short timeframe in order to meet funding and grant deadlines.

4.18. With consideration of the Justice Houlgate judgement and following a review of various sources (as set out above), we do not consider there to be an appropriate series of sites that have a connection or relationship that in combination could be considered to amount to reasonable alternative site.

Summary

4.19. A review of Strategic Regeneration Frameworks (Circle Square, Mayfield, First Street) and allocated sites within the Greater Manchester Places for Everyone plan (2024), and Manchester Development Plan revealed no reasonably available alternative sites for commercially-led mixed-use development within the defined search boundary or the City Centre as a whole. Identified Sites are either complete, under construction, or subject to planning permissions, while allocated sites are either too distant or located in flood zones.

4.20. This process does not leave any further sites to be considered and so it is concluded that the Sequential Test is passed.

5. Exception Test

Overview

5.1. Paragraph 177 of the NPPF (2024) states:

“Having applied the sequential test, if it is not possible for development to be located in areas with a lower risk of flooding (taking into account 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, in line with the Flood Risk Vulnerability Classification set out in Annex 3.”

5.2. Annex 3: Flood Risk vulnerability classification identifies “Buildings used for shops; financial, professional and other services” as “Less Vulnerable”.

5.3. Table 2 (Flood risk vulnerability and flood zone ‘incompatibility’) of the PPG sets out the below criteria for the application of the Exception Test (Paragraph: 079 Reference ID: 7-079-20220825 Revision date: 25 08 2022).

Table 1 PPG Table 2 (Flood risk vulnerability and flood zone ‘incompatibility’)

Table 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	✓	✓	✓
Zone 3a †	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓ *
Key:					
✓ Exception test is not required					
X Development should not be permitted					

5.4. As established within Chapter 1 of this report, the Site is fully located with Flood Zone 1 with localised areas of surface water flooding within the Site.

5.5. In accordance with the NPPF identifying proposed uses as “Less Vulnerable” and the Site’s location within Flood Zone 1 as assessed within Table 2 of the PPG, an Exception Test is not required.

6. Conclusion

- 6.1. This Sequential Test has been prepared by Deloitte LLP on behalf of ID Manchester Ltd and the University of Manchester and is submitted in support of planning application Ref. 143024/FO/2025, which is awaiting determination.
- 6.2. As set out in the above chapters, this assessment has established that there are no sequentially preferable locations that are reasonably available and suitable for the Proposed Development.
- 6.3. The geographic area to which the test relates is considered appropriate as it is a major development proposal that is consistent with City Centre uses.
- 6.4. The Sequential Test in this report has considered local Strategic Regeneration Frameworks, Strategic Development Frameworks, allocated sites within the Greater Manchester Places for Everyone Plan (2024) and Manchester Core Strategy (2024 as amended) as well as Sites for sale within the identified search boundary. The search has identified no suitable sites that are considered reasonably available.
- 6.5. There is no need to undertake the Exception Test for this Site.



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